

Dr

Forename:

Charles

Surname:

Brej

Representing:

Self

Organisation (if applicable):

Email:

cb@cs.man.ac.uk

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you agree that copy management would broaden the range of HD content available on DTT and help secure its long term viability as a platform? :

Not at all, Freeview has been a highly successful platform primarily due to the lack of contracts and the use of open standards which allowed very competitive pricing of hardware.

Question 2: Do you agree that the BBC's proposed multiplex licence amendment represents the most appropriate means for securing an effective content management system on HD DTT? :

If the content management must be placed into the system, then the method is rather weak (probably easily reverse engineered) and thus much preferred to more stringent encryption measures.

Question 3: Do you agree with the proposed change to Condition 6 in the Multiplex B Licence? :

No. The proposed system will be neither free/open and encouraging of cooperation and innovation, nor will it be secure and guaranteeing the restrictions will be met.

Question 4: Do you agree that Multiplexes C and D should be granted a similar amendment to their Licences as Multiplex B?. :

No.

Question 5: Do you agree that the BBC's proposed approach for implementing content management would safeguard citizens and consumers legitimate use of HD content, and if not, what additional guarantees would be appropriate? :

Although the BBC may allow open source implementations of the code, this will break one of the free software rules on allowing derivative works. Licensing the code to an open source project, is not the same as releasing the code to the community, and simply locks these projects down to a restrictive licensing agreement which would not be allowed under most open source licences.

Question 6: Do you agree that the BBC's proposed choice of content management technologies will have only a negligible impact on the cost of HD DTT receivers and their interoperability with other HD consumer equipment? . :

Yes, the additional cost to manufacturers will likely be minimal.

Question 7: Do stakeholders agree that the BBC's proposed Huffman Code licensing arrangements would have a negligible effect on the market for HD DTT receivers? :

It puts the implementations which abide by the BBC licence at a disadvantage to the other foreign manufacturers who could choose not to.

Question 8: Do the BBC's proposed content management states and their permitted use for different categories of HD content meet the requirements of other HD broadcasters on DTT? . :

Question 9: Are there any issues that you consider Ofcom should take into account in assessing the BBC's proposal, that have not been addressed by this consultation?:

I believe the ability for open source implementations of television viewing should not be impeded by this proposal.