

**Title:**

Ms

**Forename:**

J

**Surname:**

Coe

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**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? :**

No, I believe that it would reduce its long term viability as copy management is not something that end users want, and the copy management uses up extra funding and resources that could be better spent on actual content.

**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? :**

No.

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

No.

**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? :**

No, content management does not benefit consumers. It benefits only the providers. Defining "legitimate" use of HD content can either allow illegitimate use by some people in order to ensure full legitimate use by those who are entitled to it, or will restrict the legitimate use of the content in order to prevent illegitimate use. I do not believe any guarantees are possible in this area - see the DRM used on video games and music that is so easily circumvented by those who wish to avoid it, yet it causes nothing but hassle for legitimate users.

**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? .. :**

No - if end user hardware will require additional technology to enable the reception of the managed HD content, this will certainly increase the price of all receiver electronics in the UK compared to elsewhere in the world, and in addition restrict the buyers' choice since importing cheaper alternatives from (for example) Europe will not be possible as they will not have the required technology to receive the managed signal. It will also require that everybody in the UK will have to replace their current equipment if they want to continue to watch HD content.

**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? :**

**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? . :**

I think that content management on BBC HD will push consumers away from watching BBC content onto watching other HD broadcaster content without content management.

**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 think that Ofcom should look into why this technology was rejected in the United States, and try to consider the viewpoint of the consumer more than that of the provider. Adding content management will add extra cost and difficulty to the consumer for watching HD content. The content providers may threaten to not provide content, but from the point of view of the consumer, less choice of programmes is a better option than installing a content management system that benefits only greedy providers.

Ofcom should also review the effectiveness of content management that is currently used in the computer gaming and music industry. Currently this complicates life for legitimate users, and for illegitimate users it is easily circumvented, yet a significant portion of budget is allocated to persisting with content management.

Additionally, the BBC is a public broadcasting station that (almost) every person in the UK pays for. Adding content management onto this only seeks to exclude some of the license payers from content if they, for example, cannot afford the technology required to use the HD signal. Every person with a television pays for the BBC, so BBC content should be available to every license payer without needing content management.