

Title:

Mr

Forename:

Thomas

Surname:

Dalton

Representing:

Self

Organisation (if applicable):

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:

Since as a television licence fee payer, why should content that I (at least in part) have paid for have a restriction placed upon it that stops me using that content as I see fit (at least for my own personal use.)?

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. HD content will still be produced as it is part of the natural evolution of technology. In the same way that television programs and films continued to be produced after the

development of video and disc recording, so HD content will continue to be produced despite some copying/redistribution happening without the rights holder's explicit permission. Indeed, if people wish to access the HD content in an unrestricted form they will be able to do this via the internet. Restrictions on broadcast material will only affect the less technologically savvy consumer.

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. It will not stop people from accessing the content via different routes.

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? :

In the digital world it is virtually impossible to protect content; no content management system has ever been proven to be effective. All these restrictions do is to frustrate the legitimate user and encourage those legitimate user to explore how to obtain the same content with the restrictions. We cannot ignore the fact that the internet exists and it is an increasingly easy task to find out how to circumvent any restrictions placed on the content.

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 this content management system is introduced it will create a closed market since nowhere else in the world will be using the same system. This will mean that with a closed, captive market manufacturers of the equipment will be able to raise prices. Again this will only impact on legitimate users since other users will be able to access the (unrestricted) content via other routes.

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? :

The methodology used is unlikely to have a major impact one way or the other.

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?:

These proposals are akin to fitting an expensive lock (requiring users to buy an expensive key) to the front of the house while leaving the back door open.