

**Title:**

Mr

**Forename:**

**Surname:**

Fisk

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

[nick@fisk.me.uk](mailto:nick@fisk.me.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? :**

No, the past few years in the music industry has shown that DRM has not been of any benefit. Most of the DRM only schemes introduced like in iTunes and other online stores restricted the availability of content unless you had specific vendor devices. Most of these DRM schemes have been removed and been replaced with MP3, which has enabled consumers to

play their content on any media device with no restrictions. I see much the same happening with video 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. The majority, if not all the DRM schemes so far have promised to be uncrackable, but yet within months somebody has cracked them. With DRM you have to provide the consumer with the cipher, the ciphertext and the key. Apart from making it harder to extract these from the player/content, there's no sure way to make it uncrackable. Pirates will always find away round DRM, legitimate users will just be hampered by it.

I'm guessing this is relating to international protection of content. If so a better bet would be to make sure content is easily available for a reasonable price.

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

I do not disagree with the protection of content, however I do not believe that encrypting the content is correct answer.

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

I do not disagree with the protection of content, however I do not believe that encrypting the content is correct answer.

**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? :**

I do not agree that implementing DRM would safeguard citizens and consumers legitimate use of HD content. The BBC will only give certain manufacturers the decryption keys to decode their content. I for one use open source media to record and watch current freeview content. DRM keys would not be granted to such projects and so would be incapable of playing it.

**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? . :**

Depends. If this DRM move is not followed by other countries around the world, manufacturers may charge a premium for DTV boxes that has this special functionality.

**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? :**

Devices like the Tivo which had a radical change on how people could record and watch content, would have maybe never come to exist if the DRM that is under proposal had existed previously. Would many of the Linux based set top boxes which make up a very large percentage of set to boxes be able to obtain DRM licenses.

**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? . :**

Yes

**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?:**

Examine the music industry and see what effect it had there and if it was a success or failure. Looked what happened to the DRM schemes and if they had any effect on piracy.