

Title:

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Representing:

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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 BBC has already been shown to abuse DRM to serve its' own needs; take, for instance, the introduction of the ability to download programs from the BBC iPlayer.

I have no problem with them restricting playback to the specific machine that downloaded the content as that ensures content cannot be distributed to other machines/individuals which may be based outside of the UK.

However, the 30-day restriction does not serve the license payer at all; it merely serves to enforce the BBC's lucrative income stream from DVD sales.

One would argue that an individual who has paid their license fee already owns an incredibly small part of the copyright and should have the right to make personal copies of any BBC transmissions whose creation was solely the work of the BBC (i.e. no third-party outsourced productions; such as EastEnders, Doctor Who, etc, etc).

It has been shown time and time again that DRM does not serve the interests of consumers; only those belonging to the content providers.

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.

Any DRM can be compromised; maybe the BBC hasn't heard of something called the 'analogue hole' ?

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

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

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? :

Due to the widespread availability of BBC content, I don't believe I have ever seen copied BBC material available for sale in a conventional store or available online (exception: copies of very old television shows which the BBC refuses to re-broadcast or issue on DVD even though they own the copyright).

In fact, the BBC should have learnt their lesson with the old Doctor Who episodes that they carelessly wiped back in the 60s and 70s so they could re-use the tapes.

Some BBC content only existed as either audio streams that enthusiasts recorded with a

conventional tape recorder (no DRM in those days!) and some video copies existed - copies which the BBC have been grateful to receive when trying to restore original footage or include as bonus features on issued DVDs.

I believe existing copyright law is more than sufficient to protect the BBC's copyrights and those of the 3rd party providers whose content they broadcast; the public should not have to jump through even more hoops in order to utilize content which they have already paid to produce, the right to watch or the right to make personal copies.

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?

..:

Interoperability is key.

To require consumers to replace already purchased equipment with official 'Freeview' branding would be criminal - an OTA firmware upgrade would be acceptable but any other such upgrades/replacement should come out of the pockets of the BBC or those content providers who are insisting on DRM.

After all, the equipment is Freeview-certified and to change the specification at this point in time would do nothing but damage the Freeview brand and the reputation of the BBC and other stakeholders in the Freeview venture.

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? :

As long as license fees were fixed from point of agreement and not subject to change, this would be acceptable and there exists at least one open-source implementation of the decoding algorithm.

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?:

DRM goes against the entire principles of the BBC.

High-quality content for the consumer paid for by the consumer.

We do not pay our license fee to have our rights to make personal copies, as permitted by UK copyright law, curtailed by Big Hollywood.

