

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? :

I do not. I sympathise with the BBC's position that they feel they have to take this action or the large content-producing companies will refuse to allow their programmes to be shown,

but this is exactly the type of action that will kill a platform's long term viability by setting a precedent that more and more control can be taken from the broadcasters and given to the studios.

DRM achieves one purpose alone, to make something less useful than it once was at the expense of the consumer. The argument of "do it or we will take our ball and go home" does not hold weight. The content companies need the BBC and should not be able to hold broadcasters to ransom. It is Ofcom's responsibility to protect the consumer from the wishes of the studios in this case.

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? :

A secure content management system in unencrypted over-the-air broadcasts is fundamentally unimplementable, no matter what scheme is attempted. The only way to make anything that works is to encrypt the content and only allow decryption with some form of viewing card, as is currently done with satellite TV and Top Up TV.

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

No, for the reasons given in answer 2.

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

No, for the reasons given in answer 2.

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? :

There are a number of issues to consider.

Primarily, not everyone receives DTT with a 'Freeview box' but rather a HTPC (home theatre PC, or media PC). There is no way that you can prevent copying of recordings in these systems because they are just normal PCs, so they would, presumably, never be allowed to receive the EPG data. This would stop a large amount of people from receiving HD content. Ironically, people that have gone to the trouble to set up HTPCs and Media PCs are the people most likely to be interested in HD content.

Secondly, there are the standard concerns that content must be movable to portable players such as the Creative Zen or the iPod and movable to other rooms in the house for other family members to enjoy.

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?

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Cost: Yes

Interoperability: See concerns in answer to question 5. It is not simply enough to support a few major devices, all devices should be covered, which is a tough undertaking.

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? :

Yes

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? . :

Unknown

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?:

No