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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.

No such mechanisms were necessary when SD broadcasting was launched. All the arguments suggesting that copy management is necessary equally applied then.

**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. If (as the BBC suggest) the system may be implemented in open source solutions such as mythtv, there will be nothing to prevent users changing that software to remove the restrictions.

The existing systems in use do nothing to prevent the appearance of HD content on the internet, and there is no reason to believe this system will be any different. All it does is add complexity to the system, and will be ineffective at anything apart from providing a few people with a warm fuzzy feeling.

**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; a UK specific system is an unreasonable restriction and burden on citizens and manufacturers.

**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; they will require country specific models to be developed, which in addition to the cost will prevent the free movement of goods between geographies.

**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? :**

No. The extra requirements will harm adoption.

**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?:**