

Title:

Mr

Forename:

Michael

Surname:

Howard

Representing:

Self

Organisation (if applicable):

Email:

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

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

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?. :

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, it will inhibit and impede citizens and consumer's rights to access and use HD content easily and legally,

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.

Since this scheme will not be used in the US, additional changes will need to be made for HD equipment to be used in the UK, driving up prices, or limiting availability to fewer products that chose to implement compatibility.

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? :

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?:

Scrambling of broadcasts by the BBC is prohibited, and the proposal to try to circumnavigate this limitation by scrambling additional data is in against the spirit of the rules. I strongly

believe they should not be allowed to do this. Preventing access to BBC broadcast content on non content managed equipment is surely against the rules.

Copyright is the right to control copying, display, performance and re-use of your creations. It is **not** the right to design all the devices **capable** of copying and displaying your creative works. Limiting what a device can and cannot do is nothing to do with copyright, and could have catastrophic effects on our 'fair dealing' rights of quotation for news, review or criticism.

I pay an obligatory license fee and in return gain access to all the content it broadcasts. If the BBC wishes to broadcast DRM-ed content, it should either do without the license fee, or create a separate subscription channel that is not financed by licence payers.