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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. Look how the market has responded to DRM on music - people simply stopped buying DRM music. Companies that engaged in it (e.g. Sony) were pilloried in public, and public

opinion eventually won out, and now mp3 downloads are almost universally DRM-free.

In the long term, DRM only harms the consumer. If I'm paying for something (i.e. with my licence fee) I should be allowed to consume that output in any manner that suits me. There are already organisations such as Defective By Design who are campaigning against this sort of intrusion into consumption of content, and I firmly believe that ultimately the biggest benefit to the consumer will come when the material is DRM-free, and can be freely consumed using any technology that the end-user desires.

**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. History has shown us that any and all content management systems can and will be broken, no matter how secure they are believed to be.

This usually leads to either the content being made available without the restrictions (as is the case with mp3s) or the management system is upgraded (e.g. sky's encryption cards, dvd to blu-ray, etc) at which point the old content is no longer accessible.

The best content management system is to make it available without restriction at a price that people are prepared to pay.

**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. The problem is that once DRM is in place, the content is effectively no longer freely consumable. It's like buying a cd only to be told that it can only be played in a cd player (as sony attempted to do). What if I want to listen to it on my PC? Or in a DVD player? Or on an older machine that doesn't understand the encryption mechanisms?

The only way to safeguard my use of content (which, by the way, I've paid for in my licence fee) is to let me consume it as I see fit.

**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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No, of course not. DRM technology always pushes up the price, and not only that, it also impacts on the performance of the machines themselves, too. All of a sudden, there's an extra decryption phase involved, which needs more power and more cpu cycles, all of which come at an increased cost to the end user.

**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. I refuse to buy DRM products, and there's a growing number of people who do the same. I believe that it could adversely impact the market in terms of sales.

**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? . :**

I've no idea. I do believe that the BBC are effectively bending to the will of the content providers, who are scared about their content being used maliciously, but if it's aired on the BBC for free, and the BBC pay them for it, then what exactly are they losing out on?

**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?:**

Yes - the impact of DRM in the music market, and the resulting state of play in that field. I'd also suggest looking at the Defective By Design campaign, as they're far more involved with this debate than I am. Speaking as an individual who will ultimately be affected by this, I don't think that DRM is appropriate to a publicly funded body for content that they have a duty to make widely available. It's bad enough that people have been forced into a shoddy digital service with poor coverage in many areas that's badly affected by the weather.