

Title:

Mr

Forename:

Tim

Surname:

Jordan

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

email address

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? :

If the concern is that the BBC will not be able to purchase third party produced content without implementing copy management, then copy management should only apply to the

programs which have not been funded wholly or in part by the licence fee, ie original or contracted programming should be exempt.

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? :

If the BBC merely encrypts the program guide, it will have negligible effect as this will still be available in xml from other sources (radio times). It will be more of an annoyance than a problem.

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

The argument of the BBC appears to be that they must have content management because someone else has it. I think their time would be better spent hiring better negotiators rather than looking over people fences.

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

No, content management is a want without a need.

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? :

The bbc should not be requested any restriction in its role as a public service.

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? . :

I think this is untrue to begin with, once there is sufficient volume prices may drop, however the added processing power required to decrypt the Huffman tables will cost money and I feel it unlikely that a ODM will shoulder this cost.

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? :

The proposal would completely exclude the hobbyist market for PVR (mythtv, sagetv) unless the lookup tables are made freely available.

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? . :

The other broadcasters are not public organisations and should therefore be free to make their own requirements for viewing,

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?:

If the proposal is successful a copy of the lookup table must be made publically available so that it can be implemented in the hobbyist market. This should be a requirement so that the BBC remain platform independent