Title:

Dr

Forename:

Jon

Surname:

Levell

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? :

I do not agree. Locking the platform down will stifle the platform and restrict what can be done with it. Entrepreneurs will be impeded creating innovative devices that can play it. The restriction will be especially onerous for companies that want to use open-source software. Without "copy management" its popularity will ensure that content producers will make their

content available to it. The video recorder did not kill TV and TV did not need the broadcast flag to survive in the USA.

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? :

I do not agree. The obfuscation of EPG data is a fudge that attempts to circumvent the BBC duty to provide free-to-air content to the license-fee payer.

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

I do not agree for the reasons described above.

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

I do not agree for the reasons described above.

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? :

I do not agree. Devices which use open-source software are legitimate uses that need to be safe guarded. The proposal should be entirely scrapped.

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? . :

Unknown

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? :

Unknown

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.