

**Title:**

Mr

**Forename:**

Christopher

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**Representing:**

Self

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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:**

No

**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, I do not 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 see why this is a

fundamental difference from the current situation except in the matter of resolution. The difference in resolution does not to me seem to indicate that an entirely different approach is necessary.

**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 that content management is necessary or appropriate within the framework of BBC services covered by the general license fee. The need for content management is driven by demands of some parties who own some material - if they are unwilling to allow HD content onto freeview HD without such an arrangement then I am happy to be without it.

**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? :**

Personally I wish to be able to copy and store material mainly for the purpose of time-shifted viewing on a PVR (personal video recorder) either as a standalone device or as part of a personal computer containing appropriate decoding hardware and software. I do not need to make backup copies of programmes, I do not need to transfer to DVD/BluRay but I do not wish that my freedom to watch content that I have received legitimately under the TV license fee at a time subsequent to the broadcast be changed in any way from the current arrangement. I do not wish to see intrusive limits on time for retention of files, I do not wish to see intrusive measures to prevent copying (even though I have no personal need or desire to do this). These sentiments arise simply from the personal experience that I have with crudely implemented and inefficient DRM provisions that almost inevitably prevent use I would regard as legitimate (playing a DVD on a PC for example) but do not prevent piracy since such measures are almost certain to be broken within months if not weeks. This type of measure inevitably inconvenience only consumers and do not limit the activities of criminals in any way.

**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, I do not agree that this is the case. There is a long list of DRM technology that has proven to be unreliable and/or poorly implemented such that it ends up restricting legitimate use and connection of devices. There is also the problem that, once such an approach is taken and the DRM is inevitably broken there will be further demands to change the system from content owners. This will almost certainly require changes to hardware and/or software in devices. This change may not be compatible with older equipment, requiring hardware to be simply thrown away. As an example to this see the changes that took place in the standard digital television signals that caused some early set-top boxes (bought before 2004, only 5 years previously) to be useless. I generally wish to retain hardware for at least 10 years (as was the case with analog TVs where I possess an old back and white TV older than I am at 35 years old that still works [until switchover this year]) without change.

**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?:**

I would request Ofcom to fully consider whether it wishes to take on full financial responsibility for any consumer consequences of its decision. For example funding replacement of equipment should a change of standard in future require obsolescence of any equipment. If Ofcom does not wish to take on such a responsibility (perhaps because it does not feel 100% sure that such a situation may not arise) does it feel comfortable pushing such a responsibility onto consumers when it should exist for consumer protection? I would request Ofcom consider that a simple delay in release of HD programming into the UK freeview HD streams until after such content has been available for some time on other sources such as BluRay might remove any significant drive to wide-scale piracy based on recorded HD broadcasts.