

Title:

Mr

Forename:

Toby

Surname:

Milne

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, every time content providers have rattled their sabre about withholding content, if content management is not supplied, they have eventually seen sanity and backed down - for example the "broadcast flag" in the US.

I don't believe that they would give up the revenues they receive from the BBC.

Also, as someone who used to work in the music industry selling content online, the long term trend has been the removal of DRM & Content Management because of customer support costs and device incompatibility, so a DRM free solution will be more viable long term.

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, it seems like restriction by the back door. It won't inconvenience professional copyright infringers, but it will harm the average consumer, especially those who use subtitles or schedule information in the EPG.

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

No, for the reasons given in answer to question 2 and 6.

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

No, for the reasons given in answer to question 2 and 6

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, i think it will just increase support costs and decrease choice of receivers. As i mentioned in answer to question 1, the whole online music industry is abandoning content management, as expensive, unreliable and unpopular. It seems short sighted to repeat the mistakes made with music again with HD TV.

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, as someone who has built their own "homebrew" DTT receiver, this change would effectively block my reception of HD content. Further to that I expect the same issue is faced by small independent manufacturers of bespoke receiver equipment, whose customers are the very people who would appreciate HD quality.

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, for the reasons given in answer to question 6

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 think Ofcom should consider:

1. Whether this change does anything other than inconvenience British TV viewers, and handicap independent receiver manufacturers. Broadcast HD is not the only source of HD content - anyone who wants to get pirated HD content will be able to find the material that is broadcast in the US without DRM on the internet.
2. Whether it is a good idea to hand control of who is allowed to receive content to the DTLA