

This email is in response to the HD Freeview platform consultation.
All my comments may be published without restriction immediately.

My name is Glyn Moody, and I am writing as a UK television licence fee payer, and as a technology journalist who has been writing about DRM, open standards and open source software for 15 years.

As I noted in my previous submission to you, using DRM (euphemistically termed "copy management") to lock down look-up tables is not compatible with the BBC's role as a public broadcaster.

Employing DRM would undermine the argument for continued funding through a television licence - something that is hardly in the BBC's interest. As someone who has paid a TV licence fee for many decades, I find this proposed move a betrayal of all that the BBC has achieved and stands for.

The argument that producers will not supply content in the absence of DRM has been shown to be false in the US, when precisely the same argument was used, and precisely the same threat made. When that bluff was called, nothing happened.

In any case, bringing in DRM is pointless: circumventing this approach is trivially easy. But what it does mean is that the BBC will be beholden to content producers, many of whom are located overseas, and have no interest in supporting a thriving local media industry. If Ofcom approves this proposal, it will be weakening indigenous production.

Finally, the move is also anti-competitive, because DRM will lock out solutions based on open source code, the most vibrant part of the software industry, and one in which Europe excels. Again, the proposed move will weaken local industries and hand over effective control to foreign companies.

I would also like to register my dismay at the way the online consultation response form has been worded: practically every question pre-supposes that the proposed DRM solution is acceptable. This alone suggests that Ofcom is not serious in its call for comments, and that it has already made up its mind to approve the BBC's misguided plans.

At the very least, the questions should have been worded in a neutral fashion.

The fact that Ofcom is insisting that all emailed responses be "in Microsoft Word format", evidently unaware of open ISO standards like ODF, merely confirms its lack of understanding of what openness means, and why it is important in today's digital world.

All-in-all, this whole saga reflects very poorly both on the BBC and on Ofcom.

Yours Faithfully,

Dr Glyn Moody