

**Title:**

Mr

**Forename:**

Paul

**Surname:**

Rae

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

[paul@impacttrainingsolutions.co.uk](mailto:paul@impacttrainingsolutions.co.uk)

**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, i strongly disagree with this and if implemented limit consumers ability to view and record tv.

Further, the concept of DRM is flawed and a self-perpetuating myth that it prevents piracy or unauthorised use. All it does is frustrates and alienates legitimate consumers who want to use content in new and different ways.

DRM incurs carriers and consumers significant costs which are ultimately a waste of money, as to date there has not been a DRM system implemented that has not been circumvented - typically within weeks if not days after release.

**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

**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? :**

No. Consumers do not want DRM or content management systems. They want the right to choose how to use the content they have paid for.

They do not want to go out and purchase the latest and greatest portable media player, phone, pvr, dvr, etc... only to find they cannot use it as it is not a licensed player. This only further frustrates and alienates users, who may then look to unlicensed sources for the content. DRM pushes legitimate consumers to piracy.

Additionally, there is a large number of users who may have a TV card in their pc or may have a HTPC (home theatre pc) that they use as a dvr. Any form of DRM or content management system would prevent these users from watching and recording content they have paid for. A means of facilitating these users would have to be provided which given different operating systems (Microsoft Windows XP, Vista, 7, varying linux distributions, Mac OS X, etc...) is not practical.

**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 strongly disagree.

Not only would it limit consumers ability to view and record tv, they would incur additional costs due to having to purchase additional equipment.

Further when purchasing additional equipment, manufacturers would have to pass on the additional drm license costs to the consumer for a technology they do not want, require or see any benefit from.

Ultimately the consumers loses twice, they have to purchase new tv's, stbs, pvrs, dvrs etc... as their old equipment will not work and they have to pay a higher price for it.

**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?:**

Consumers do not find DRM or content management to be acceptable in anyway.