

Title:

Mr

Forename:

Paul

Surname:

Tansom

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 that copy management would broaden the range of content available on DTT. I would expect this change to reduce the content available by restricting some content from being available to all. I suspect that it may open up the process by which DTT becomes more restricted in content availability by restricting access to more modern formats of content, thus

starting the process of DTT moving to a subscription only access for up to date content viewing.

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 the BBC's proposed multiplex license amendment represents the most appropriate means for securing an effective content management system on HD DTT. It will increase the costs of both running the service and accessing the service by making the process more complex and restricting the range of devices that can access the content and placing control of access in the hands of a few commercial interests. It will not prevent copying by parties seeking to profit from content copying, but will make access by those with a legitimate right to view the content more difficult and costly.

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

I do not agree with the proposed change to Condition 6 in the Multiplex B License. It is unnecessarily restricting access to information that should be publicly available. As a license payer I should be able to find out what content is available without restrictions and additional cost to access the EPG and program information.

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

Since I disagree with the amendment to the license for multiplex B I cannot see any reason to change this view for multiplexes C and D. See 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 that the BBC's proposed approach would safeguard legitimate use of HD content. It would have the opposite effect. It would restrict legitimate use of the HD content by forcing use of commercial solutions for content access, which should not be a requirement, whilst at the same time having no impact on non-legitimate access to the content. The only people to suffer from these changes would be those who they seek to protect.

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? . :

I do not 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. It will have a significant impact. To start with the will inevitably be some equipment that becomes obsolete because it cannot be modified to work with the new technologies, thus requiring purchase of new equipment (this will potentially have a significant environmental impact which is completely unnecessary). Some receivers will have no means of becoming compatible because of the costs involved in implementing the content management technologies.

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? :

The Huffman Code licensing appears to be freely available to implement, but I do not have enough background on this to give an informed answer.

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? . :

I do not have enough background on this to give an informed answer.

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?: