

Title:

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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:

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 do not agree.

As the BBC's position clearly is that content providers might not agree to content being shown unless it is done so under some copy management method, then clearly, available content would be restricted.

Further, given that standards have already been published AND that broadcasts have already begun, the uptake and demand for HD DTT would be seriously undermined if the notion of copy management was introduced at this stage.

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. The question presumes that it is right to introduce content management.

Having already disappointed the public with the introduction of DVB-T2, alongside DVB-T, there is clearly a minority that would benefit by such amendment, if agreed, whilst the overwhelming majority of viewing public and equipment vendors would be at a disadvantage and inconvenienced further.

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

No. Again, this would benefit a minority at the gross expense of the majority. The BBC would do well to remember that the majority constituency, here, are the licence fee payers.

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

No. This would be necessary only because of the changes that would be necessary if changes to Condition of 6 in the Multiplex B Licence were granted.

This does rather serve to illustrate that the fact that such changes being proposed have quite wide implications and are likely to be very costly to the UK viewing public, be they PSB or Pay-to-View consumers alike.

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. The UK already has many laws which protect the rights holders of such content. There is no difference between SD and HD content, in this regard, so the proposals to treat HD content separately with over-elaborate change would make no difference to rights holders, citizen consumers or the BBC. It would simply serve no benefit.

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?

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No. The BBC's position that Open Source processes will act as some kind of safeguard is complete nonsense. How many popular, in-use today, commercially available devices would be able to observe the BBC's standards for the UK?

Is it not the case that by using DVB-T2 to transmit and MPEG-4 stream places the UK in an already unique, and hence costly, position?

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. How many vendors outside the immediate and small 'closed user group' of broadcasters are going to be at a disadvantage? These proposals from the BBC are anti-competitive, at least.

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 believe that this would be the case. It is interesting to note, that having lobbied for DVB-T2, with MPGE-4 transport it is large the BBC that is carrying this torch for content management.

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?:

Yes. Ofcom would do well to consider the effects on consumers that these proposals, if accepted, would bring. To summarise:

HD DDT is just launching, having had to wait quite late into 2009 for the sanctioned transmission method to be agreed. Such changes would set back public confidence in that, once more, there is likely to be another set-top box required to "enjoy" such content services.

Consumer equipment manufacturers have already embarked on delivery of "Freeview HD" capable devices. They, and consumers, are not likely to benefit from changes required to introduce support for content management.

Digital Switchover is well beyond planning and now into implementation. The impact to all broadcasters and citizen consumers should be considered as part of the reason not to accept these changes.