

Title:

Mr

Forename:

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Vincent

Representing:

Self

Organisation (if applicable):

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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. Whilst it may mean, in the short term, that more content is broadcast, by making it significantly more difficult to receive the broadcast (needing non-standard and currently unavailable equipment) the availability to consumers will actually be low.

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. There is no effective securing of content. Look at what has happened in the past with other media. All that will be achieved is a lock in to some proprietary technology which reduces usability and stifles future innovation whilst making the marketplace for equipment less competitive (our equipment will be different to other countries, so no economy of scale) and confusing to a population who are already confused by the whole digital TV thing.

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

no. See above answers.

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

no. See above answers.

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. Those that want to circumvent the technology will do so, especially those doing it for profit. It would also reduce the consumers legitimate use and restrict their options for what devices to use to view the content. That cannot be in the consumers interest.

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. It will have a huge impact. Our equipment will be more expensive because it is non-standard, and the whole point of this technology is to prevent interoperability of equipment.

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? :

There is a risk that this will make the terrestrial HD option uneconomic and too confusing for many users.

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?:

The BBC has a responsibility to serve the needs of the public. Imposing these restrictions and complications on content will not serve their needs. It should also be remembered that the BBC is a significant global player and this must counteract some of the "pressures" from content creators that it cites as an excuse for leading us down this road.