

**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? :**

Absolutely not. DTT's long-term viability is not an issue here anyway, most citizens receive their television signal through an aerial and this will not change.

**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 am strictly opposed to the idea of any content management system being implemented. The proposition of an 'effective content management system' is an oxymoron. All anti-piracy systems have been defeated. They therefore only serve to limit the rights of citizens to the content they own, or in the case of the BBC, pay a stealth tax for.

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

No. EPG data should continue to be made freely available, so that citizens may use free community-developed open-source solutions and not have to subscribe to a closed-shop system which will stifle innovation.

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

No, as 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? :**

No. There will always be legitimate uses of content that would be prevented by any content management system. Therefore the only way to safeguard citizens' and consumers' legitimate use of content is not to implement such a system.

**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. Consumers will be forced to buy devices that subscribe to the system. The system costs money to implement in manufacturing. This cost will be passed on to citizens.

**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. Because consumers will be forced to buy devices which subscribe to the system, the market for receivers and receiving software will contract as free open-source solutions will no longer be viable.

**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? . :**

No comment.

**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?:**

No. I merely submit that Ofcom should accept the public's view that they should be presumed innocent until proven guilty, as much as the BBC would like to implement a system that would presume the opposite.