

Title:

Mr

Forename:

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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? :

I do not agree to this assertion. As the music industry has demonstrated, the addition of rights-locking to content causes more hard than good in the long term, alienating those with

wish to access said content, and their embrace of lock-free content has coincided with a surge in purchases. Similarly, locking of broadcast television to 'approved' devices that prevent access to recorded content will only harm the consumer, and the by extension their trust in the BBC to provide quality and accessible content.

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 any content management system is 'effective'.

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

I do not agree to this change, EPG data must remain freely and openly accessible. i.e. Huffman Coding may be utilised, but access to the required lookup tables cannot be restricted.

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

I do not agree to this change, EPG data must remain freely and openly accessible. i.e. Huffman Coding may be utilised, but access to the required lookup tables cannot be restricted.

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. As has occurred with the American ATSC standards "broadcast flag", it's implementation would inevitable be abused to the detriment of the public. Remote control of content situated on hardware owned by the consumer, by parties not directly accountable to the consumer, is not acceptable. It should be noted that the "minimum level of content management needed to secure HD content" is determined SOLELY by the rightsholders in this proposal.

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 disagree. The requirement that excessive and ultimately ineffective licensed 'content management technologies' (such as HDCP and AACS) be implemented before access to the Huffman lookup tables is granted would place a non-negligible cost increase on HD DTT receivers and other HD consumer 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? :

The requirement that excessive and ultimately ineffective licensed 'content management technologies' be implemented before access to the Huffman lookup tables is granted would have a non-negligible impact on the market for HD DTT receivers and other HD consumer equipment, by severely restricting the ability of manufactures to provide functionality demanded by the consumer, such as the ability to transfer and play recorded files on existing separate devices.

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? . :

As the "minimum level of content management needed to secure HD content" is determined SOLELY by the rightsholders in this proposal, the proposed content management states may meet the requirements of other HD broadcasters, but is entirely open to their abuse.

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 requirement for HDCP on ALL content management states would prevent the output of signals via existing HD interconnection methods such as Component Video, VGA and unencrypted DVI. Many consumer display devices do not support, and by technical definition cannot support, restriction technologies such as HDCP over these interconnects. Requirement for HDCP restriction on all outputs would prevent consumers with these displays from viewing content, when otherwise they would be perfectly able to.