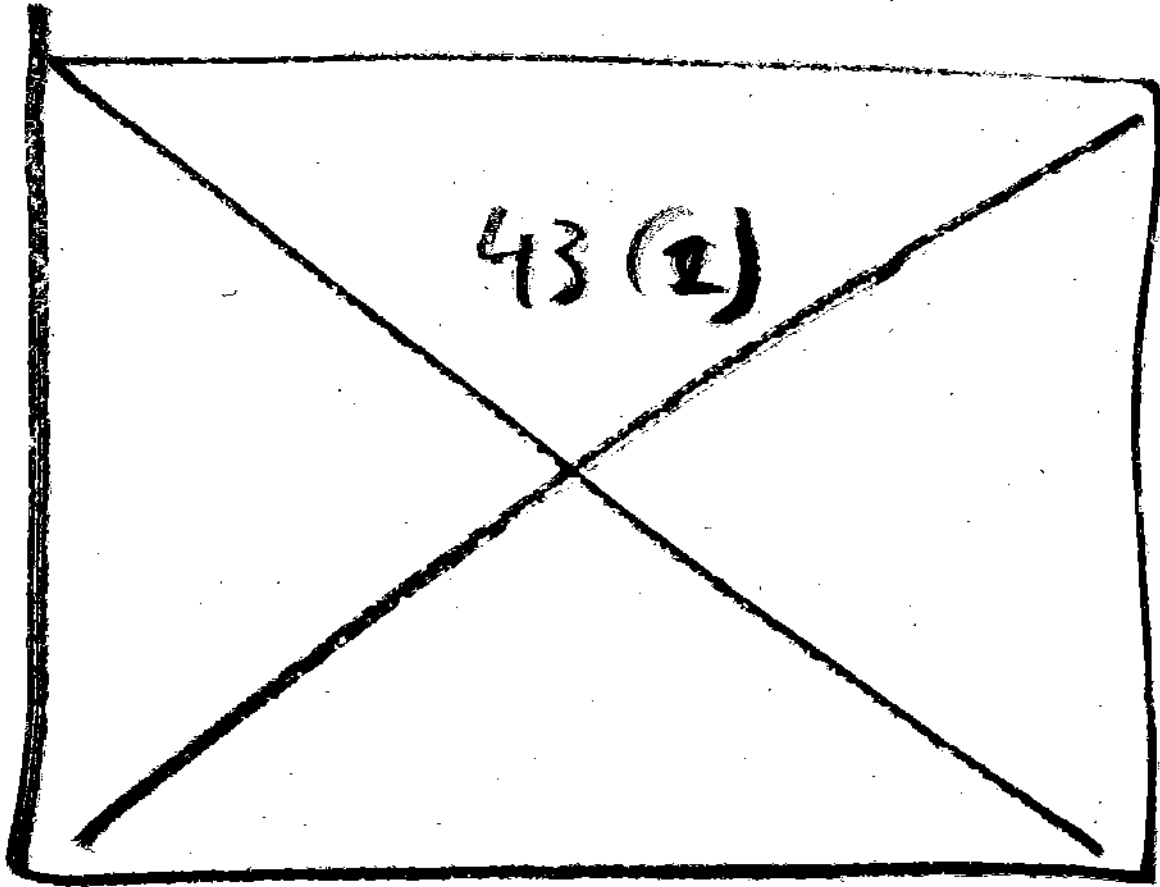


David,

Please find below comprehensive answers to the questions set out in your email of 19 April 2010:-



Freesat content management signalling

As with Freeview HD, Freesat provides two layers of content management signalling.

The first layer of signalling is at the service level. This forms part of the Service Descriptor Table (SDT). This information is static and applies to the BBC HD channel as a whole. This ensures the protection of all HD content.

The second layer of signalling is inserted in the Event Information Table (EIT). EIT signalling is dynamic and is inserted on a programme-by-programme basis by the central collator (EPG management system). This signalling sets the level of content management applied to each particular programme.

Freesat receivers look first at the content management signalling provided by the EIT. Only if the EIT signalling is missing or in error does the receiver apply the content management state signalled in the SDT.

The BBC confirms that the encoding system sets the SDT for the BBC HD channel to the 'Managed Copy' ('Copy Once') content management state. **However**, on a programme-by-programme basis, the BBC signals the correct level of content management protection to apply to each item of content using the EIT data which is inserted as part of the Freesat EPG. This enables the BBC to accurately

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change the content management signalling at programme junctions and ensures that PVR's and Blu-Ray disk recorders apply the correct content management to any copies of that content.

Since December 2009, the BBC has been correctly signalling content management state for each programme broadcast on the BBC HD channel on Freesat (and on Freeview HD) by dynamically varying the signalling associated with that content/programme in the EIT. The BBC can confirm that the vast majority of content broadcast by the BBC is signalled in the EIT with the 'Multiple Copy' state applied. 'Managed Copy' ('Copy Once') signalling is only being applied to those programmes where the rights owner has licensed content to the BBC on the basis that the BBC will only broadcast this content on free-to-air platforms with 'Managed Copy' (or equivalent) content management limitations applied.

The BBC also confirms that it is applying a near-identical SDT and EIT content management signalling approach to all BBC HD content broadcast on Freeview HD - although (of course) the compliance of consumer electronic products with this signalling can not be strictly enforced, as yet.

The BBC notes that prior to December 2009, dynamic signalling of content management states was not being applied by the BBC on a programme-by-programme basis in the Freesat EIT and that all content was being signalled in the 'Managed Copy' ('Copy Once') state. The BBC also notes that analysis of the SDT for the BBC HD channel (without reference to the EIT signalling) today would indicate that the channel is applying 'Managed Copy' to all content.

The BBC suggests that either of these factors may have resulted in the view that the BBC is not currently complying with the content management approach detailed in our recent submissions to Ofcom. However, I am confident that this is not the case and that the BBC is already fully complying with the approach we have proposed for all Freesat and Freeview HD broadcasts.

James Jackson

Head of Broadcast Infrastructure
BBC Distribution

30 April 2010