Archived: 08 March 2022 11:50:09
From: [redacted]
Sent: Wed, 13 Oct 2021 08:41:41
To: RCCP Consultation
Subject: Response To RCCP Consultation
Sensitivity: Normal

To whom it may concern

I am responding to the consultation on Reforming Competition and Consumer Policy on behalf of Domestic & General group ("**Domestic & General**"). Domestic & General is a provider of appliance insurance and maintenance and service plans for boilers. We have reviewed the consultation and we want to respond to points made in Chapter 2 in relation to subscription contracts. Specifically, we are responding to question 41 which asks if there are certain contract types or types of goods, services or digital content that should be exempt from the rules and the reasons why.

Currently, Domestic & General's insurances policies and maintenance and service plans are offered to customers on a subscription and auto-renewal basis. One of the main advantages of this to customers is that they do not need to worry about any break in cover on essential home appliances (such as washing machines and fridges) and boilers. If customers had to opt-in for an auto-renewing policy or plan, there is a risk that that they fail to renew at the appropriate time and find themselves without cover for their appliance. We believe this could have serious adverse effect on customer welfare given the fact that our cover is for essential home appliances and heating. For example, if a customer forgot to renew their boiler service plan in December and their boiler broke in January, they would be without cover for essential heating during winter. This is particularly important for vulnerable customers who rely on Domestic & General to service their appliances and boilers. Clearly, with a transparent subscription policy or plan which auto-renews, this would not be the case.

Given the above, we request that the Government exclude appliance insurance and heating / boiler maintenance and service plans from the rules.

Yours faithfully

[redacted]

[redacted]

Email: [redacted]

Domestic & General

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