

To whom it may concern.

We are a local, family run holiday let agency in the South West of England. We largely welcome the broad intent of the legalisation relating to drip pricing and fake views. However we are very concerned about the unintended consequences of aspects of the legalisation, which could have fundamental challenges to the self-catering tourism industry. Whilst we acknowledge that consumer protection is important, some of the proposed measures could undermine the fundamental structure of agency operations, increase security risks, property owner privacy, and the integrity of the industry.

### **Drip Pricing**

We are advocates of avoiding drip pricing scenarios, by including our obligatory booking fee in the total front end price that the customer sees. However, there are various optional extra prices, such as: pet fee, EV charger fee, paying a security deposit or security waiver option. All of these options noted are optional to the guest booking and added at the basket check out area of the website. If these had to be included in the list price, then it would provide the customer with a very false impression of the cost of the holiday, massively inflating the price for optional extras they did not want.

### **Disclose of contact information**

One of the most significant issues is the proposed requirement for agencies to disclose the full contact details of property owners at the invitation to purchase stage. This requirement raises serious concerns about privacy, security, and the viability of the agency model.

Requiring disclosure of owner contact details would:

- Increase the risk of fraud and phishing attacks. Fraudsters will simply harvest this data from smaller platforms like our own or larger agencies/ Airbnb/ Vrbo,
- Undermine the role of agencies as intermediaries who provide essential services such as guest screening and dispute resolution.
- Disrupt the traditional business model of agencies, removing the value add that the agency has added in marketing, and operating the business and potentially allowing a direct booking to be made leading to revenue losses and potential withdrawal of properties from the short-term rental market as a whole.

We urge the CMA to recognise the role of agencies in protecting both owners and consumers and to amend the guidance to allow agencies to continue acting as intermediaries without being forced to disclose owner details.

As previously stated, we largely welcome the broad intent of the legalisation relating to drip pricing and fake views. However, the proposed requirement to disclose owner details and redefine pricing structures threatens to fundamentally affect holiday let agencies. We would ask you to reconsider these areas, and begin dialogue with PASC (Professional Association Self Caterers) to help provide you with a wider overview of the industry.

Kind Regards



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