

Market Review Report - Stage 2

Competition Commission: International
comparative study of extended warranties

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FOREWORD

In February 2003 PA Consulting was engaged by the Competition Commission to undertake an international comparative study into the market for extended warranties (hereafter known as 'EWs') on domestic electrical goods (hereafter known as 'DEGs').

A study by the Office of Fair Trading (OFT), published in July 2002, found that competition in the market for EWs on DEGs did not appear to be working effectively, and that consumers were not adequately informed or protected. Given the issues raised in the OFT report, the Competition Commission wished to investigate the market.

The international comparison study detailed in this Report forms one part of the Commission's overall investigation. PA's overall study is split into two stages: Stage 1 (conducted in February 2003) provided a brief view of the structure of the market in each country, while Stage 2 forms a more in-depth analysis of a sub-section of the markets drawn from Stage 1. This Report covers Stage 2 only.

This Report seeks to provide further international context for the Commission's overall investigation by delivering insight on DEG retailers' EW pricing structure, as a proportion of DEG price, and the terms and conditions offered with the EW.

It is the intent of this study to provide impressions of the markets studied, rather than conduct a full statistical exercise. The research covers a broadly representative sample both of DEG retailers and DEG products within each country. Appendix A details the full research approach employed in this study.

NOTE

The Competition Commission has excised from the PA report some company names, or information which allows company names to be identified, in order to protect the confidentiality of some sources, or where adverse comment was passed on companies who are not parties to the inquiry. Such excisions are either indicated by the symbol [X], or a company name has been replaced by a description such as [a retailer] or [a manufacturer] in square brackets.

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1. EXECUTIVE SUMMARY

This Executive Summary highlights the key findings from Stage 2 of PA's international comparative study of EWs.

Stage 2 was focused primarily on DEG and EW pricing in the countries under study (Denmark, France, the Netherlands, UK and USA), and also on the terms and conditions to which the EWs are subject.

The specific market features under investigation in each country were:

- DEG retail price
- EW price (often split by duration of EW)
- Key terms and conditions to which the EW was subject, defined as:

EW duration	Accidental damage cover	In-home repair
Overlap with manufacturer's guarantee	Theft cover	Repair within specific number of days
Mechanical breakdown (parts) cover	Frozen food loss cover	Cashback
Mechanical breakdown (labour) cover	Replacement product if repair uneconomic	New product discount
Call out fee	New for old	Cancellation period
Wear and tear cover	Continuous cover	

In Appendix A, we detail the research process employed for gathering data on these market features (understanding this process will also help the reader interpret the research findings).

1.1 KEY FINDINGS: PRICING

Two notable findings have emerged from the analysis of EW and DEG price levels:

- *The UK appears to have relatively cheap DEGs and expensive EWs ... even when adjusted for the average consumer price level in each country, the UK appears to have a high price level for EW compared to Denmark, France, the Netherlands and USA.*
- *EW price as a proportion of DEG price varies considerably by product type ...especially for white goods (dishwashers, washing machines and freezers).*

1.2 KEY FINDINGS: TERMS AND CONDITIONS

Two key findings emerge from the Stage 2 research into a select number of terms and condition offered:

- *A common set of core, secondary and rare terms and conditions are offered across all countries and all product types ...* while a basic set of conditions are commonly covered (replacement product if repair uneconomic, cover for mechanical breakdown (parts and labour), and continuous cover (although the latter does not appear to be standard in the UK), all other conditions vary by retailer and DEG.
- *The UK appears to have the widest scope of terms and conditions ...* the UK offers the broadest and one of the most consistently available set of terms and conditions out of the all the countries studied.

2. OVERVIEW: DEG AND EW PRICING

The analysis for this Section has focused on pricing data (both in terms of the DEG itself, and the EW(s) offered with it) gathered for each of the 6 DEG products across each of the 5 countries.

2.1 INTRODUCTION

The primary objective of Stage 2 was to provide the Commission with insight on retailers' EW pricing structure (as a proportion of DEG price), covering:

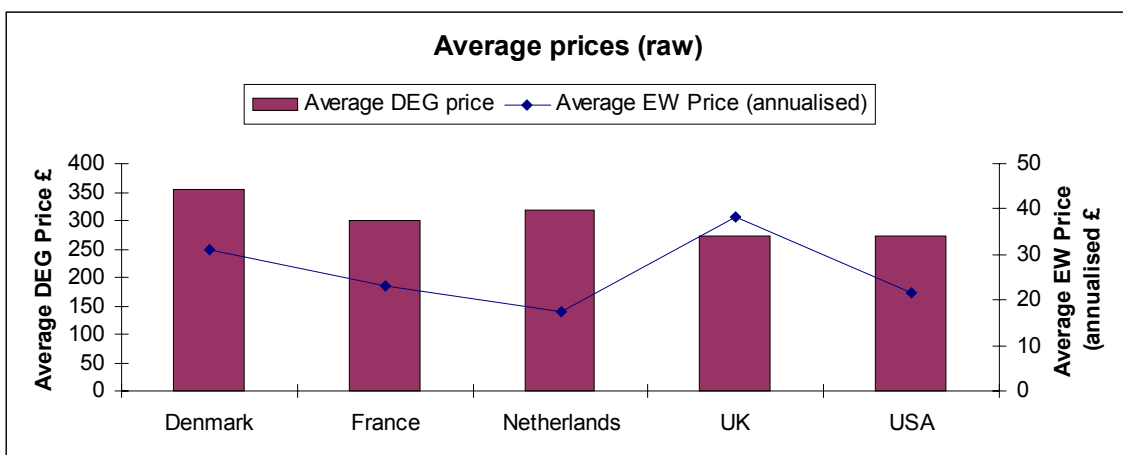
- the 4 DEG retailers analysed in Stage 1
- 6 of the DEG types covered in Stage 1, comprising 3 brown goods (ordinary TV, DVD player, and a mini HiFi system) and 3 white goods (dishwasher, washing machine, and a freezer)¹
- the price of the EW(s) offered by the retailer for each DEG.

To further aid international comparison (and continuity with Stage 1 of this study), specific DEG models were chosen for each country based on their similarity in specification to models in the other countries.

PA went to great lengths to ensure that if a retailer did not stock the pre-defined model, a substitute model with the same key features was chosen. This necessitated several iterations of data gathering to ensure that all possible model combinations were considered, before a final pan-study set of models was chosen (see Appendix A).

2.2 VARIATIONS IN AVERAGE PRICES

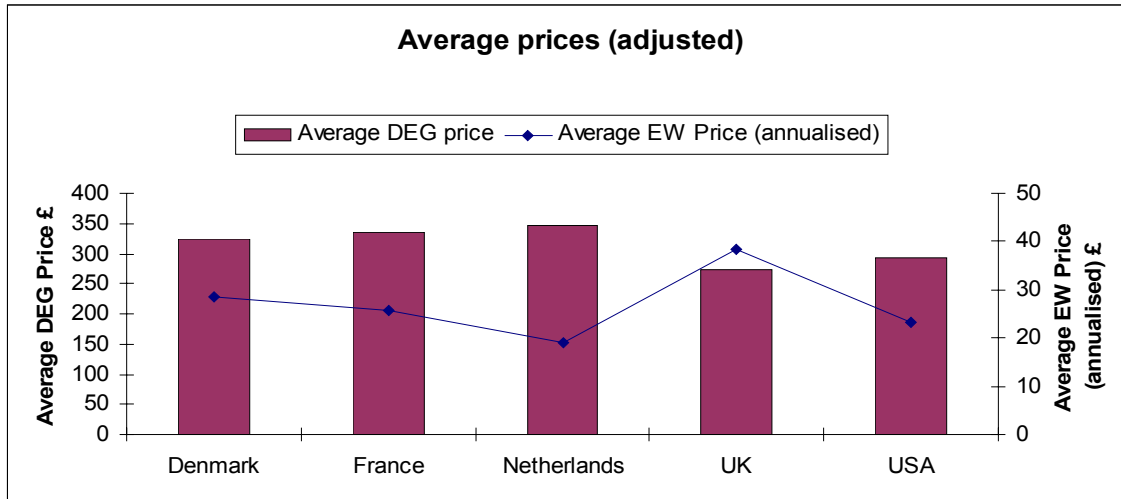
Analysis of average DEG price and average EW price (annualised)² by country shows that the UK has relatively low prices for DEGs and relatively high prices for EWs (Graph 1):



¹ PCs and Mobile phones were specifically excluded from Stage 1 and Stage 2 of this study. This is because the value proposition of a warranty package is frequently different from the white/brown goods sectors – the premium covers a different set of risks and services.

2. Overview: DEG and EW pricing...

The prices shown have been converted from local currencies to UK sterling pounds at the interbank exchange rate of 1st April 2003. In Graph 2 below, we adjust for the average consumer price level in each country (OECD price index December 2002, UK = 100),³ to account for variations in overall consumer price levels between countries:



With this adjustment, the pattern in the UK of relatively cheap DEGs and relatively expensive EWs is even more evident.

Even with this adjustment made, it is necessary to view the results with a degree of caution, since:

1. There is some unavoidable variation in the DEG models sampled. PA has gone to great lengths to select models of similar specification, but in a large minority of cases, the preferred model has not been available (see Appendix A)
2. The sample is not an entirely random selection from the DEGs (and related EWs) population. Both the retailers and DEG product types have been pre-selected. Although they were selected to be as far as practically possible representative of the country markets, the possibility of bias remains
3. No account has been taken of variation in terms and conditions – we address this as far as possible below.

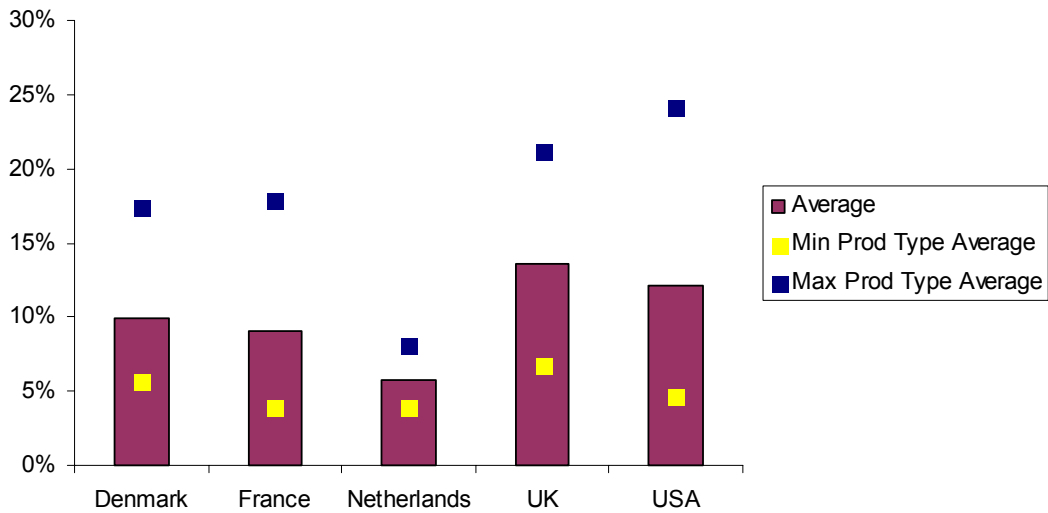
² For the purposes of this analysis, annualised EW duration excludes the period where the EW overlaps with the manufacturer's guarantee.

³ Adjustment has been made for the average price level across an OECD-determined basket of consumer goods (OECD, December 2002).

2.3 VARIATIONS IN EW PRICE AS A PROPORTION OF DEG PRICE

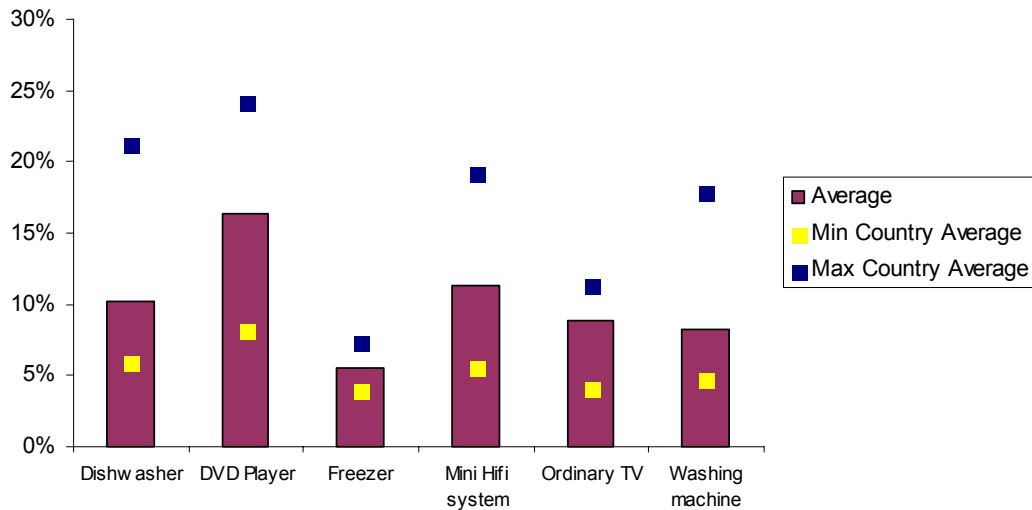
Looking at EW price as a percentage of the DEG retail price in each country (Graph 3 below), we see the UK has both the highest average and the highest minimum:

**ANNUALISED EW PRICE AS % DEG PRICE
(ALL PRODUCT TYPES UNADJUSTED)**



When analysed by product type, there are substantial variations in EW price:

**ANNUALISED EW PRICE AS % DEG PRICE
(ALL COUNTRIES UNADJUSTED)**



There could be many reasons for the variations in EW price across different product types – for example, frequency of fault and cost of repair.

2.4 CONCLUSION

Whilst the observed high average and minimum UK prices for EWs may be of interest to the Commission, they must be viewed in the context of the variations in terms and conditions identified below.

3. OVERVIEW: EW TERMS AND CONDITIONS

This Section considers the terms and conditions to which EW are subject, the data gathered for which is tabulated in summary form in Appendices B, C and D.

3.1 TERMS AND CONDITIONS BY PRODUCT TYPE

Terms and conditions are tabulated by product type in Appendix B (brown goods) and C (white goods).

3.1.1 Core terms and conditions offered

As can be seen from these tables, across all DEG products – both brown and white goods – a core set of terms and conditions are offered in most cases:



Although product replacement in instances where repair is considered uneconomic is the only condition that is offered by all EWs across all countries, all four of these terms and conditions are prevalent throughout.

In many cases some level of cover is provided, but exclusions or limitations apply:

- In the UK, continuous cover is rarely provided for. At Currys, for example, if the product is replaced then the EW terminates. Although vouchers are given for the remaining value, these can only be used if the consumer buys Currys' Coverplan again in the future.
- Even at Comet, where continuous cover is provided, if an insured appliance is replaced due to breakdown or accidental damage the unexpired portion of the EW will transfer to the replacement product.
 - However, if an equivalent model is not available the consumer will be given Comet vouchers equal to the original purchase price; in this instance the extended warranty policy will end and no refund of premium will be due.
 - Also, the expiry date of the policy will not be amended or extended and the breakdown cover starts when the new manufacturer's guarantee expires (although this was commonly recorded in this study).

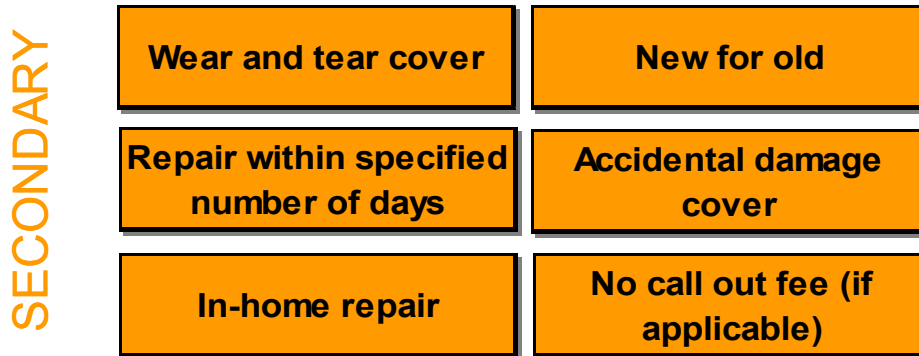
There are also caveats to the product replacement offering of some EWs.

- At Conforama in France, for example, replacement will occur only if the product breaks down within the 8 days of its purchase.
- In the US, by contrast, Best Buy's cover includes a 'no-lemon' clause: a 'lemon' is defined as a product that requires more than 3 repairs in 3 years (this clause, however, is subject to Best Buy's discretion).

3. Overview: EW terms and conditions...

3.1.2 Secondary terms and conditions offered

A second set of terms and conditions are also generally offered – but these are more secondary, in that they are not always offered for every product, and every retailer does not always offer them:



Across all countries studied, the extent to which these terms and conditions are offered is marginally greater for white goods than for brown goods. This appears to be addressing the inherent difficulties customers might face in taking a white good back to the store for problem diagnosis and/or repair, and the avoidance of an associated call out fee to cover the service contractor's house visit.

Call-out fees, where applied, do vary: from 15 Euros (UK£10.35 equivalent) with [one retailer] in the Netherlands (but only after the first two years of EW have passed), to 300 DKK (UK£27.86 equivalent) at [a retailer] in Denmark.

It is worth noting that determining whether an EW covers 'wear and tear' and 'new for old' would, on the basis of this research, prove relatively difficult for normal consumers. Generally, both EW features are rarely mentioned in EW paper brochures, online documents, and even the policies themselves, and sales assistants are often unable to confirm (with confidence) the inclusion of these terms and conditions in one telephone conversation.

In particular, 'new for old' is not always consistently defined – such that it is not always clear whether the replacement product would in fact be a new and not a refurbished product (as defined in this study – see Appendix A). For Good Guys in the US, for instance, 'one of like kind and quality' will replace the product; similarly in the UK, for Currys the replacement may be a fully refurbished product (or vouchers to purchase a new product of at least equivalent spec), and at Euronics the replacement is described as a 'new equivalent machine'.

Consumers would also need to be careful in estimating the number of days repairs are expected to take. For example:

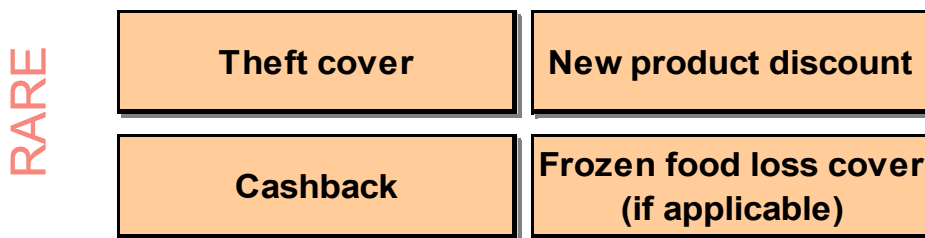
- Elgiganten in Denmark state 'as soon as possible'
- Conforama in France commit to 'act quickly'
- Block in the Netherlands state that 'it depends upon resource availability and the type of breakdown'.

3. Overview: EW terms and conditions...

Where a turnaround time is specified, times vary from 10 days both for Electric City in the Netherlands and Euronics in the UK, to up to 6 weeks for Currys in the UK (whereafter the consumer may request a 'replacement product').

3.1.3 Rare terms and conditions offered

Finally, there are also a small number of terms and conditions that are not typically offered as part of an EW:



Unlike accidental damage cover (more frequently offered – see above), which could also be covered by home insurance, theft cover is rarely offered on EWs on DEGs. Even at Currys in the UK, where theft cover is provided on all DEGs under study for the first year of purchase, a number of further conditions are set e.g.:

- there is no cover if the product is stolen 'whilst out of sight or control'
- the replacement product will not be protected by theft insurance.

Money-saving related terms are also very rare: no evidence of a cashback offer was found in any country under study, while new product discount offers are available only in France and the UK.

The latter EW feature, once again, requires the consumer to read the conditions carefully. In France, for example, the terms offered by [two retailers] state that 20% of the old DEG price will be taken off the purchase of a new DEG, but the discount cannot exceed 20% of the new DEG price. The purchase of the new DEG must also happen within 2 years following the end of the initial EW. At Currys in the UK, similarly, only after having purchased a 5-year EW is the consumer entitled to a 10% discount on the next product – although this product must also be bought with a 5-year EW agreement.

3.1.4 Other terms and conditions offered

The other EW features under investigation are considered below in turn:

- *EW duration* ... the duration of EWs available to the consumer differs little overall – the average EW duration for all DEGs studied (excluding the period of overlap with the manufacturer's guarantee) is 2.7 years.

3. Overview: EW terms and conditions...

- *Overlap with manufacturer's guarantee* ...The overlap period is commonly either 1 or 2 years, except in France where all EWs commence only after the manufacturer's guarantee has expired.⁴
- *Cancellation period* ...This period is commonly between 14 and 30 days, except in both France and the Netherlands where no period is specifically defined.

3.2 TERMS AND CONDITIONS BY COUNTRY

The EW terms and conditions data gathered is tabulated by country in Appendix D.

As can be seen from this table, each country offers the same common sets of terms and conditions – indicating that the EW 'packages' offered across these countries are not generally determined by product type.

Of the five countries studied, the broadest package of terms and conditions is offered in the UK, where EWs offer the highest proportion of the peripheral and atypical terms and conditions. Similarly, the UK offers one of the most widely available packages of terms and conditions – nearly two-thirds of the key terms and conditions under study (9 out of 14) are available in three-quarters or more of the relevant retailers.

Of the other countries, the US appears to offer the narrowest scope of terms and conditions. While Denmark, France and the Netherlands offer the same core set of terms and conditions, these countries differ according to:

- Which secondary terms and conditions are offered
- How widely available these secondary terms and conditions are.

It should be noted however, that each term and condition has been given equal weight; since we have no information to make adjustments for either cost or value to consumers.

⁴ At Darty and Conforama in France, for example, the EW commences only after the retailers' own initial warranty (which is free, and last for 2 years i.e. beyond the expiry date for the manufacturer's guarantees) has expired. This offering is made available on both brown and white goods.

4. CONCLUSION

EW price as a proportion of DEG price appears to vary both by country and product type. By contrast, a common set of core, secondary and rare terms and conditions are offered across all countries and all product types.

In comparative terms, the UK appears to have the most expensive EWs and the cheapest DEGs, but also offers the greatest scope of terms and conditions out of all the countries under study.

It is difficult for consumers to compare offerings between retailers. With the plethora of terms and conditions, often containing complex or ambiguous limitations and exclusions, it is difficult to identify the relative value of one offering compared to another and, in turn, make a rational judgement.

APPENDIX A: RESEARCH APPROACH

Throughout this study PA Consulting has sought, as in all its work, to be:

- *Impartial* – PA have made a fact-based analysis, aware of the context, but independent of previous findings.
- *Rigorous* – The research approach is designed in two stages – the first a broad sweep, the second a more in-depth investigation into the countries which are found to have aspects to their markets which may inform the Commission's judgement on the UK market. This Report covers only the second stage.
- *Internationally consistent* – PA has consciously employed a prescriptive research approach. This is to ensure that a uniform process is followed in all the countries, enabling valid international comparison.

This Appendix provides background to the research findings presented in the main text. The objectives of Stage 2 of this study are detailed, as is the research approach designed to meet those objectives.

We then present a number of important parameters that were established to focus the research activity, and – for each country – briefly list the specific retailers and DEG product models sampled.

A.1 STUDY OBJECTIVES

The primary objective of Stage 2 was to provide the Commission with insight on retailers' EW pricing structure (as a proportion of DEG price), covering:

- the 4 DEG retailers analysed in Stage 1
- 6 of the DEG types covered in Stage 1 (3 brown goods, 3 white goods)
- the price of the EW(s) offered by the retailer for each DEG
- terms and conditions of the EW offered by each retailer to cover the DEGs.

A.2 RESEARCH METHODOLOGY

The research required for Stage 2 fell across three interrelated activities, all undertaken during March 2003.

A.2.1 Online research

The focus for this research was the 4 DEG retailers analysed in Stage 1 of this study – i.e. the 2 large retailers and 2 smaller, independent retailers researched in each country.

The online desk research in each country falls across three activities:

- **Documenting retail prices for each DEG model** ... The price recorded was the retailer's *normal retail price* – i.e. not a sales/promotional price that was only available in the short-term. This was to ensure that the 'normal' market situation for

A: Research approach...

each retailer in each country was being analysed. Furthermore, the price recorded was the full price to be paid by the consumer at the time of purchase.

- **Documenting the price of EW offered for each DEG model ...** If the retailer offered more than one EW type on a DEG model, then the price (and the terms and conditions – see below) of each and every EW were recorded. Once again, the price recorded was the full price to be paid by the consumer at the time of purchase.
- **Documenting terms and conditions of the EW offered on each DEG model ...** The key terms and conditions of each EW offered on each DEG model were recorded. Where a term/condition in a country corresponded closely – but not *precisely* – to a term/condition pre-defined in the template, this term/condition was recorded, but a note was also made of the nature of its potential deviation from the template.

A.2.2 Telephone research

To fill in any data gaps, and – equally as important – to verify the data gathered online, Department representatives (or equivalent customer service department) for each retailer were interviewed over the telephone to collect the information required in the template.

As in Stage 1, the analyst sought to conduct this interview as an interested ‘mystery shopper’ (see Stage 1 Report for an overview of this research method). For benchmarking purposes, all telephone calls were made on a weekday, just after office opening (e.g. off-peak periods).

A.2.3 Supporting research

On occasions when the online/telephone research failed to provide either the information necessary, or sufficiently verified the information collected, then the country analyst visited (in person) the retailer’s store, in order to conduct in-store interviews with retail sales assistants.

Retail stores visited were exactly the same stores (and location) covered in Stage 1.

In order not to excessively waste the retailer’s resources in any way, the analyst’s interview with the staff member did not exceed 30 minutes in total.

For benchmarking purposes, we request that stores be visited on a weekday, just after opening (e.g. off-peak periods). This is also when sales assistants should have more time available.

A.3 STUDY PARAMETERS

A number of important parameters were established to focus the research activity in Stage 2 of this study:

A.3.1 Definitions

Consistent with Stage 1, for the purposes of Stage 2 of this study:

- **Domestic electrical goods** (referred to as 'DEGs') are defined as *products designed to be connected to an electricity supply or powered by batteries, and on which extended warranties are offered to consumers.*

DEGs are commonly sub-divided into 'white' (e.g. fridges, washing machines) and 'brown' (e.g. TVs, HiFi's) goods. Other goods such as PCs, toys, and electric power tools were specifically excluded from this study.

- **Extended warranties** (referred to as 'EWs') are defined as *a contract, whether backed by insurance or otherwise, which covers consumers for the cost of any repairs or replacements that may become necessary within a specified period beyond that covered by a manufacturer's, retailer's or importer's guarantee. This includes contracts that provide cover during the period of the manufacturer's, retailer's or importer's guarantee, and contracts where cover commences after this period.*

Where no insurance is involved, and repairs are usually conducted in-house, these warranties are commonly known as 'service agreements'.

There was also a number of EW terms and conditions that were examined in detail as part of Stage 2 of this study. For the purposes of this study, the following common definitions were used:

- *'New for old'* ... this refers to the mechanism by which, if a product is replaced rather than repaired, a completely new appliance (rather than a refurbished one) is provided.
- *'Continuous cover'* ... this refers to the mechanism by which, if a product is replaced, EW cover continues until the end of the EW duration period.
- *'Wear and tear'* - this refers to the cause of breakdown for which a consumer could claim; i.e. a consumer could claim if the product fails as a result of the wear and tear from normal use (in addition to the possibility of claiming as a result of product failure due to mechanical breakdown).

A.3.2 Country and product sampling

Stage 2 of this comparative study covered only five countries. The countries were a selection of markets that – on the basis of the findings from Stage 1 of the study – have significant sales of DEGs, and EW market structures similar to the UK (see table below).

Similarly, the six DEG products chosen were drawn from the list of nine in Stage 1 – on the basis of being the 'Top 3' brown and white goods that are most frequently sold with extended warranties (based on UK market data – OFT, July 2002).

A: Research approach...

Domestic Electrical Goods (DEG) within scope
Ordinary TV
DVD player
Mini hifi system
Washing machine
Freezer
Dishwasher

Extended Warranty (EW) Markets within scope
UK
Netherlands
USA
Denmark
France

A.4 INDIVIDUAL COUNTRY SAMPLING

A.4.1 DEG retailers

To aid international comparison and ensure consistency in this study, the four DEG retailers chosen for Stage 1 in each country were chosen again in Stage 2 (see table below).





Country	DEGs retailers
Denmark	El-Giganten Electric City Skousen Expert
France	Darty Conforama Carrefour Farom
Netherlands	Megapool Staffhorst Block It's
UK	Comet Currys Miller Brothers Euronics
USA	Good Guys Best Buy Circuit City Sears

A.4.2 DEG product models



To further aid international comparison (and continuity with Stage 1 of this study), specific models were chosen for each country based on their similarity in specification to models in the other countries.



PA went to great lengths to ensure that if a retailer did not stock the pre-defined model, a substitute model with the same, key features was chosen. This necessitated several iterations of data gathering to ensure that all possible model combinations were considered, before a final pan-study set of models was chosen.

Details of both the pre-defined and substitute models (where required) are provided in the table below, followed by examples of comparative product features for pre-defined and substitute models.

PRODUCT	MANUFACTURER	PRE-DEFINED MODEL	SUBSTITUTE MODELS (WHERE REQUIRED)	KEY FEATURES
Ordinary TV				
	Philips	25PT4457 Nicam Stereo Sound	Philips Traditional TV 6 Philips 25PT5107	25-inch screen size Surround sound capability No video player
		25PS40S Quadra Surf remote Incredible surround sound	Philips 21PT5407 Philips 27PS55S Panasonic CT25G7 Philips 24RF50S	
DVD Player				
	Sony	DVP-NS305 Precision Drive 2 CD-R/RW & MP3 CD Block Noise Reduction TV Virtual Surround	Panasonic DVD32 JVC XV-S302	CD-R/RW compatibility Surround sound capability No video player Entry level device
		DVP-NS315 Precision Drive 2 CD-R/RW Playback TV Virtual Surround	N/a	

A: Research approach...

PRODUCT	MANUFACTURER	PRE-DEFINED MODEL	SUBSTITUTE MODELS (WHERE REQUIRED)	KEY FEATURES
Mini HiFi System				
	Panasonic	SC-AK300 5 CD changer 100W RMS output 3 way speakers	Philips FWC399 Philips MC77 Philips FWC390 JVC MX-GT700	Multi CD changer
Dishwasher				
	Bosch	SGS 4452 FF 4 Programmes Aqua Sensor 52dB noise level	Indesit DI 70 Indesit D63	4 Programme options White Water overflow feature Low noise level 60cm width
		SHU 432x 4-level wash Sensotronic 52dB noise level	Bosch SHU43C02UC Maytag MDB8600A	
		SGS 43A12 GB 4 Programmes 52dB noise level	Bosch SGS43E02 Bosch SGS4352	
		SGS 4642 4 Programmes Aqua Stop 52dB noise level	Bosch SGS46A62 Bosch SGS4722ABB	
		SGS 43A62 EU	Bosch SGU4362SK Bosch SGS53A52 Bauknecht GSF1481WS	

PRODUCT	MANUFACTURER	PRE-DEFINED MODEL	SUBSTITUTE MODELS (WHERE REQUIRED)	KEY FEATURES
Washing Machine				
	Bosch	WFR 2466 1200 spin speed 15 Programmes	Zanussi FJD1466W	Max spin speed greater than 1200 RPM
		WFR 2460 1200 spin speed Logixx Controls	Bosch WFO2861 FF Siemens 1261 Maytag MAH5500AWW	Water overflow feature Greater than 5kg capacity
		WFR 2430 1200 spin speed Aqua Sensor	Bosch WFO2451 Siemens WXML1460	60cm width Single function (no tumble drying facility)
		WFR 2850 EU 1400 spin speed Aqua Spar System	Bosch WFL2850DN Bosch WSL2850 Siemens WXML2850	
Freezer				
	Whirlpool	AFG 392 Fast freezing function Power blackout memory	Frigidaire FVE3199B Whirlpool AFG395 Whirlpool AFG390H Whirlpool AFG 3250H Bosch GSS32410 Bosch GSS32420 Siemens GS32S420 Brandt U25FGWJ	Freestanding Large capacity Single function (no combined fridge-freezer)
			Frigidaire	

TV: pre-defined and substitute models – key feature comparison example

Product Information	Pre-defined model	Substitute model
Brand/number	Philips 25PT4457	Philips 25PT5107
Description	Ordinary TV	Ordinary TV
Screen size	25"	25"
Surround sound capability	Yes	No
Power output (Watts RMS)	10	10
Text TV memory	Yes	Yes
FM radio	Yes	Yes
VCR player	No	No
Remote control	Yes	Yes
On-screen display	Yes	Yes

Washing machine: pre-defined and substitute models – key feature comparison example

Product Information	Pre-defined model	Substitute model
Brand/number	Bosch WFR 2460	Maytag MAH5500AWW
Description	Washer	Washer
Max spin speed (Watts RPM)	1200	N/a
Real time delay	Yes	Yes
Capacity	N/a	5.9kg
Front loader	Yes	Yes
Tumble dryer function	No	No
LED touchpads	Yes	Yes
Energy Star Compliant	Yes	Yes
Handwashables setting	Yes	Yes
Delicates setting	Yes	Yes

Freezer: pre-defined and substitute models – key feature comparison example

Product Information	Pre-defined model	Substitute model
Brand/number	Whirlpool AFG 392H	Frigidaire FVE3199B
Description	Upright freezer	Upright freezer
Capacity (cu.ft)	11.7	10.9
Height (cm)	179	177.7
Freezer compartments	8	7
Frost free	No	No
Energy efficiency grade	B	B
Energy consumption (kW/year)	434	412
Reversible door	No	No
High temperature warning light	Yes	Yes
Freezer star rating	4	4

B: T&Cs by product type (brown goods)...

APPENDIX B: T&CS BY PRODUCT TYPE (BROWN GOODS)

C: T&Cs by product type (white goods)...

APPENDIX C: T&CS BY PRODUCT TYPE (WHITE GOODS)

D: T&Cs by country (all goods)...

APPENDIX D: T&CS BY COUNTRY (ALL GOODS)
