

January 17, 2025



The Honorable C.T. Wilson

Chair

House Economic Matters Committee

Maryland House of Delegates

Lowe House Office Building, Room 231

6 Bladen Street, Annapolis, MD 21401

RE: HB 107 (Pruski) - Consumer Protection - Automatic Renewals

Dear Chair Wilson and Members of the Committee,

Thank you for the opportunity to testify today on behalf of DoorDash regarding House Bill 107.

DoorDash is a technology company that connects consumers to the best of their local communities. We are deeply committed to consumer transparency, ensuring that customers have clear and accurate information to make informed decisions. We strive to provide transparency across all the products and services we offer, including our subscription savings program. By prioritizing openness and accountability, we aim to build trust and deliver a seamless experience for our customers every day.

To that end, while we are firmly aligned on the need for full transparency in auto-renewal contracts, we have several concerns with HB 107 as drafted. While we share the sponsor's commitment to promoting transparency in subscription auto-renewals, we oppose the bill in its current form due to provisions that are vague, ambiguous, or may degrade the consumer experience. We appreciate your effort to address this important issue and look forward to collaborating to improve the legislation.

First, the requirement in Section B(1)(II) for businesses to disclose all cancellation methods at the point of signup is problematic. For businesses offering multiple cancellation options, this could overwhelm consumers with excessive information, detracting from their overall experience. Additionally, it is impractical to disclose all methods in space-constrained environments, such as app settings. We propose amending the bill to require businesses to disclose at least one cancellation method at signup, balancing transparency with usability.

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Second, the language in Section B(3)(II)(3.) (A) requiring a “direct link” is vague and could lead to inconsistent interpretations. To ensure clarity and practicality, we recommend specifying that the “direct link” should lead to the initiation of the cancellation process. This clarification aligns with the bill’s intent to simplify cancellations for consumers while ensuring they have the opportunity to explore alternative options, such as discounts, promotions, or temporary pauses.

Third, the notice requirements in Section D are unclear and appear redundant with other notice obligations already outlined in the bill. To avoid confusion and ensure clarity in implementation, we recommend striking Section D.

At DoorDash, we remain committed to transparency and delivering the best possible experience for our consumers. We believe that by refining the language in HB 107 to address these concerns, the legislation can better achieve its goals without creating unnecessary burdens or confusion.

Thank you for your consideration. We look forward to working with the committee to address these issues.

Sincerely,
Chad Horrell
Senior Manager, DoorDash