



State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

Scott Walker, Governor
Theodore K. Nickel, Commissioner

Wisconsin.gov

March 5, 2018

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KRISTI W RICHARD
MCGLINCHEY STAFFORD
301 MAIN ST SUITE 1400
BATON ROUGE LA 70801

Re: General Motors – Optional Bumper-to-Bumper Warranty

Dear Ms. Richard:

The state of Wisconsin Office of the Commissioner of Insurance ("OCI") received your letter dated February 28, 2018 requesting OCI's determination as to whether General Motors' Optional Bumper-to-Bumper Warranty would be exempt from the form filing requirements of s. 616.56, Wis. Stat.

Your letter states that any additional charges for the optional bumper-to-bumper warranty would be based solely on the duration selected. In addition, your letter argues that any extra cost attributable to the optional bumper-to-bumper warranty (above and beyond the standard warranty) should not be considered to be additional consideration beyond the purchase price of the vehicle, but rather, should be considered to be an increase in the vehicle's option pricing (e.g. – a "subtotal" for purposes of final price determination).

In addition, your letter notes that the optional bumper-to-bumper warranty would not have a separate set of terms from the standard, and that, unlike vehicle service contracts, the optional bumper-to-bumper warranty is fully transferable and non-cancellable.

Based on this information provided in your letter, the proposed optional bumper-to-bumper warranty would be considered to be a "Warranty", as defined by s. 616.50 (14), Wis. Stat., and therefore would fall under the "Warranties" exemption per s. 616.52, Wis. Stat. (i.e. – the form filing requirements per s. 616.56, Wis. Stat. would not apply).

Please don't hesitate to call me at (608) 266-9896 should you have any questions.

Sincerely,

Kristin L. Forsberg
Insurance Financial Examiner Chief
Bureau of Financial Analysis and Examinations
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