

Dear Mr Robertson,

I am an uberX rider and a resident of Lane Cove electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is more reliable than any NSW taxi service as the drivers can speak English, are friendly, cars are clean and I feel safer (as the cars are always more mechanically sound). Uber always arrives as booked - unlike using NSW taxis who often cancel my booked job at a moment's notice and I am then left without another taxi picking up my 2nd booking request, so end up stranded and invariably late for work, meetings and appointments.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.



Council of Social Service of New South Wales

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25 September 2015

Submitted online at: <http://pointtopointtransport.nsw.gov.au/make-a-submission>

Dear Sir or Madam,

Re: Inquiry into Point to Point Transport

The NSW Council of Social Service (NCOSS) appreciates the opportunity to provide input into the Inquiry into Point to Point Transport.

NCOSS works with and for people experiencing poverty and disadvantage to see positive change in our communities. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone. As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

Wheelchair-accessible taxis (WATs)

NCOSS urges the Taskforce to ensure that any recommendations made do not reduce access to, or the reliability of, the WATs service. WATs provide a crucial means of transport for people with disability and this must be protected. NCOSS cautions against any restriction of the current incentives provided by the NSW Government to provide wheelchair-accessible services.

Impact on Community Transport Sector

NCOSS is deeply concerned about the impact of the Taskforce's discussion paper and subsequent recommendations on the community transport sector. Community transport provides a vital service to older people and people with disability who face barriers to accessing mainstream public transport. Any suggestion that community transport is operating unlawfully is misinformed. The *Passenger Transport Act 2014 (NSW)* s5(2) recognizes community transport as a public passenger service and community transport will be regulated under this Act when it comes into effect. NCOSS asks that, when formulating its recommendations, the Taskforce bears in mind the crucial role that community transport plays in the lives of vulnerable people.

Concessions

The Taxi Transport Subsidy Scheme (TTSS) is an important means of ensuring taxi affordability for people with disability. The majority of people using the TTSS have low

household incomes.¹ NCOSS encourages the Taskforce to consider the needs of people experiencing poverty and disadvantage and ensure that concessions are applicable to ridesharing services².

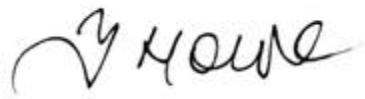
Social Inclusion

Accessible and affordable transport is a key component of social inclusion. New forms of point to point transport, such as ridesharing services, have the potential to improve transport access for people with disability and older people. NCOSS urges the Taskforce to take account of these people and their transport needs when making its recommendations.

NCOSS would welcome the opportunity to engage further with the Inquiry on the details of this submission.

Should you require further information, please contact John Mikelsons, NCOSS Deputy CEO, on 8960 7916 or via email at john@ncoss.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tracy Howe', with a stylized flourish at the end.

Tracy Howe
Chief Executive Officer

¹ Stancombe Research & Planning, 'Wheelchair Accessible Taxi Customer Research', conducted for Transport for NSW, 2013.

² This submission uses the same definition of 'ridesharing' as that used by the Taskforce in its Discussion Paper.

Get out and about!



ACTIVUS
TRANSPORT

SUBMISSION TO THE POINT TO POINT TRANSPORT TASKFORCE

Discussion Point 1.

One issue which restricts taxi drivers income is the high cost of obtaining a taxi license and the high 'rent' charged by taxi owners to cover their costs. A more sustainable way to increase the wages of taxi drivers is to have the license fees reduced and the 'rent' costs be set by the IPART.

Discussion Point 2.

The networks are not consistent and we have found that we have received better service by taxi drivers and hire car companies who we can book directly with and form a relationship with. Therefore there seems to be no benefit in regulating the networks.

Discussion Point 3.

Given the huge interest in Uber across the world, it is obvious that most people would like to see less regulation and more flexible transport available. Whilst there should be some standard regulations regarding the road worthiness of the vehicle this is met by the RMS current standards. Perhaps the main benefit in regulating taxis would be the opportunity to provide more stringent training requirements, these training requirements could include training in dealing with aged, cultural and Linguistic Diverse community etc. At this time only the wheelchair access taxis are required to undergo any special training. There is no benefit to taxi drivers to take on the short trips which leads to many older people being reliant on community transport which may not be available for all their trips. By deregulating the industry it may encourage more taxis on the road.

Discussion Point 4.

Wheelchair access taxis are a valuable resource, and those who form close relationships with wheelchair users may make a reasonable living, however as the NDIS comes on stream, there may be more people, who use wheelchairs, who will need to

access Taxis – the government should do a survey of wheelchair users to determine the needs of this community. Costs of modifications to the vehicle are a one off –however, the cost of running these heavier vehicles are an additional cost to the operator. An increase in the number of wheelchair taxis would be useful as regular clients can also use these vehicles when not required for wheelchair users.

Discussion Point 5

Ridesharing will suit some people – often younger people – and can take the pressure of those areas where taxis are hard to source. However they should not replace taxis particularly in the rural areas which are poorly serviced by taxis.

A simple solution would be to grade point to point services – Grade 1 would be taxis which provide a door to door service for people who need support such as wheelchair users or people with a disability – the subsidized costs of these should be discussed as part of the NDIS transport options.

Grade 2 transport could include those taxi which provide a curb to curb service and which operate in peak times where people are prepared to pay more for their transport.

Grade 3 transport would be the current unlicensed ridesharing which allows people to make some money from the use of their own vehicle and in their spare time.

The only regulation required for these Grades, other than specific training for Grade 1 would be the registration and insurance and possible Criminal Record Checks for drivers, as currently expected for Community Transport Drivers.

Roslyn Morton

General Manager

25 September 2015

Monday, 21 September 2015

Dear Minister and Point to Point Taskforce Taskforce

In this presentation I've focused on only one and the most pressing issue: Uber. Others can wait, because unless this is resolved satisfactorily you will have lost any effective over this sector of the transport industry.

I have been working in the Sydney taxi industry since 1975. Currently I own the above RTO delivering quality training to taxi driver applicants. I also work for the NSW Taxi Council. One of my roles there is to deliver the Taxi Operator course.

I have been involved in most of the various improvements made in the taxi industry. One of the most notable was the setting up of the first 'elite luxury fleet' in 1990. I also set up and managed the first English language school for taxi drivers in Sydney.

I spend a great deal of my time lecturing on the Transport for NSW policies and standards for taxi drivers and operators. Currently with government inaction in dealing with the UberX issue I wonder if I should cease all operations and quit.

I feel it hypocritical to tell prospective taxi drivers and operators that they must learn, understand and apply all the required standards and regulations which affect them. That they also have to pay fees such as authorisation, accreditation, taxi lease and fines for breaches becomes an insult when the NSW government allows UberX fake taxi drivers to just do what they like. Also the irony that these students must follow regulations and protocols and yet they see and hear the example that UberX is able to pay off the government with their fines.

On 30th April 2009 I paid the NSW government for a Taxi Licence with the understanding and trust that they would maintain standards, act responsibly and regulate the taxi industry competently and fairly to the benefit of all stakeholders. Please note that I actually handed over the counter a bank cheque for \$365,769 at (then) Ministry of Transport, Level 4, 16-18 Wentworth Street Parramatta, trusting that investing a sizeable part of my superannuation would be safely invested through the state government who set the standards and regulated the taxi industry in which I had spent 32 years working honestly and productively. Until now the only breach of that trust has been the irresponsible release of unnecessary taxi plates.

Now we have the incongruous situation where the government on the one hand charges high fees to taxi operators while handing out breach notices to any operator or driver who fails to maintain the standards or the regulation, yet allow a blatant bogus unauthorised unaccredited taxi network (UberX) to do whatever they like. It is a blatant case of double standards and a disgraceful conflict of interests.

I applaud your recent efforts and undercover operations by RMS officers, but this is too reactive. Accepting their existence enables them to continue. Banning them stops them. Nothing is too hard if you are resolute and refuse to lower your standards. Uber is ruthless and will use any means, any person to achieve profit. They do not care about governments' or jurisdictions' policies, standards or regulations. They are part of the brave new world of 'It's new so it must be good.' Any degree of tolerance of Uber will result in them seeing this as a weakness to be exploited and exploitation is their game.

Now is a critical time for your department/ministry to stand up and be counted. It's a time to assert the qualities of high standards and to assert the policies that Transport for NSW promotes. Failing to do so may render Transport for NSW more ineffective and powerless as Uber stealthily gain a stronger foothold in our transport industry. As far as they're concerned this is just the beginning. There's a lot more to come.

Bogus taxis**(see link on page 3)* have always existed. Many shifty characters cruise around trying to pick up prospective taxi passengers especially at peak demand times. Blurring the boundaries between bona fide taxis and illegal ones cannot be constructive. We currently have the situation where failed taxi drivers can get hire car authorities without any training. If they work for disreputable hire car operators they can acquire 'leached' taxi work easily. Last week I spoke to a taxi driver applicant who'd just failed the taxi driver English test, so immediately started driving UberX. Wanted to be a taxi driver – couldn't meet your standards – so UberX becomes the obvious choice. At a recent Silver level workshop a taxi driver with 6 months experience told me he was waiting for a taxi when an unmarked car stopped and the driver said, "You want a taxi, I'm an Uber taxi". Being curious the passenger took the ride and was told he could pay with a credit card, but it didn't work so he paid cash. If it does what a taxi does, it is indeed a taxi. Currently authorised hire car drivers are generally too scared to tout on the street for fear of being caught. Not so with UberX drivers, they have nothing to fear. Also UberX drivers are lawbreakers, knowingly and wilfully taking passengers illegally. So that type of person, willing to break the law, is the type of character they attract. Sure some will be excellent, many OK, but as they become more powerful their business model demands that they attract as many drivers as possible, because they're expendable. Then will follow serious complaints like <http://www.goldcoastbulletin.com.au/news/gold-coast/kicked-out-cabbies-signing-on-to-uber-says-gold-coast-cab-company/story-fnj94idh-1227516855780>

Why do we allow a foreign multinational with almost unlimited funds and legal resources move in to do whatever they want regardless of the regulated standards, legislation and statutory fees that apply to local services? Andrew Constance (10/09/14) said, "If it's not Uber it will be something else." No Mr Minister it will be Uber plus anyone else who wants to pretend to be a taxi. Don't imagine that Uber will be the only new player in the taxi market. There are many shonky outfits eagerly awaiting an opportunity to be allowed to infiltrate the taxi market. Any easing or removal of current standards would encourage them to operate unfettered.

When one arrives in a third world airport terminal the risk of catching an unauthorised taxi is well known. This will be our future if the clear distinction between real taxis and bogus ones is not clarified and defined by those we trust to govern and regulate our services. On a recent trip to the Philippines I experienced the taxi nightmare that is Manila airport. Having been advised to take the yellow regulated cabs to avoid being ripped off I joined the queue at the taxi rank. One hour later having moved only a few metres I decided to talk to one of the many touts (who ignored the transit officials present) to discover the illegal taxi rate was four times the regulated rate, but I would get a taxi immediately. The "Taxi" was a disgusting filthy old car driven by a nice man who received only a tiny portion of the massive fare I paid. This means that the touts and most importantly the criminal organisation controlling them reaped most of the money. This scenario will be Sydney without the proper standards and their regulation.

Personally I strive to be honest in all my dealings with all parties. If I could not ensure that graduates from Sydney taxi driver authorisation and operator accreditation would receive a fair and level playing field provided them by government and industry then I would cease operations. It would be hypocritical of me to pretend that the outcomes of much hard work and time spent on meeting high standards was to be sullied by the allowing of cheats to enter the market at will.

We might as well authorise non qualified people to install the electrical wiring in our houses or dispense with all regulations.

It's quite easy to identify a proper taxi in most cities in the world, because most people do not want to take the risks associated with the bogus ones. The issues of workplace safety and workers rights that we observe are of course of no concern to UberX. I like the civilised world where there are clearly defined demarcations between that which is official, legal and safe compared to the ad hoc self-regulating (or not) random black market vendors.

Here's an example of a text about bogus taxi drivers which was used in the National Minimum English Standard English test for taxi drivers. It makes very interesting reading in this climate.*

<http://www.smh.com.au/nsw/police-warn-of-rogue-cabbies-20101009-16d5r.html> please read this article carefully, because it shows how far we've come (or regressed since 2010). As far as I'm aware the risks of unmarked cars picking up vulnerable people is always a menace. There are thousands of individuals who would relish a weakening on standards and protocols enabling them to pose as a 'sort of' taxi driver. The same goes for the training environment. I could name many of the sleazy operators who'd leap in to exploit and take advantage any easing of standards for taxi driver training.

If you decide on the soft option of legalising UberX (and taking money from them) please let me know so that I can desist from:

- Complying with ASQA VET RTO registration standards
- Striving to meet and enhance the quality of training services we deliver
- Liaising and complying with TfNSW and RMS standards, policies and procedures
- Encouraging new taxi drivers to our industry and ensuring they deliver quality service

I'll list the RMS/TfNSW Taxi Driver Authorisation Criteria so you can ponder if you think Uber will comply with them to ensure a level playing field:

1. A fully unrestricted NSW drivers' licence for 12 months of the last 2 years
2. Pass a medical examination
3. Provide 100 point ID (including work rights status e.g. passport)
4. Satisfy RMS/TfNSW that you are a fit and proper person to drive a taxi
5. Be at least 20 years old
6. Wait up to 2 months for checks to be cleared
7. In addition – if you have been in Australia for less than 5 years provide an overseas police clearance (this can take 3 months and in some countries – impossible)
8. Pay RMS \$100

Next:

1. Pay \$165 and sit the National Minimum English Standard for taxi drivers (English test) only at NSW AMES. If you don't pass this tricky test the first time you pay again or resit a small part for \$99. Note the same organisation fails you then you pay them again to retest you.
2. If you haven't given up by now – enrol in one of the 3 accredited taxi schools in Sydney to do "The Course". In Sydney RMS/TfNSW, on this hopelessly inaccurate and out-of-date web page, <http://www.transport.nsw.gov.au/professional-drivers/taxi-driver/taxi-driver-training-and-knowledge-test> advises you to contact a taxi training school.
3. Register with the taxi training school, pay their fees, attend and pass assessments on the course. Then you'll receive a Statement of Attainment (Taxicare Plus Bronze Level) and for seven units of TLI21210 Cert II in Driving Operations to present to RMS.

4. Sit and pass the RMS Sydney Knowledge and Regulation Test which will take about 2 to 3 months to complete if you study hard.

Next:

1. After you become a taxi driver you have to register in the second taxi driver training course called Taxicare Plus Silver Level which requires you to:
 - drive a minimum of 48 shifts
 - keep a training logbook up to date
 - attend 2 seminars
 - attend 2 workshops

Then after one year you pay \$120 and renew your taxi authority.

During your tenure as an authorised taxi driver you will be liable to fines and penalties detailed in the <http://www.transport.nsw.gov.au/sites/default/files/b2b/taxi/driver-authorisation-package.pdf> (note the date!) and the 2007/2014 Regulation. These can range from warnings to fines up to \$5,000, suspensions, retraining and cancellation.

While working successfully as a taxi driver, after some experience you can apply through your taxi network to join an 'elite fleet' as a reward for delivering quality customer service.

If you did indeed survive this far, and managed to cope with all these barriers and hurdles, you'll get to compete with an overseas multinational organisation who doesn't believe any of this applies to them. You'll have to meekly observe your job and or investment fading into insignificance as the unfair competition is allowed to rob you.

If you want to further your career in the regulated taxi industry you can become a Taxi Operator, but will have to:

1. Apply to RMS/TfNSW for Taxi Operator Accreditation - \$100
2. Be subjected to similar checks as for the taxi authority
3. Pay for and successfully complete the Taxi Operators Course
4. Pay RMS or a current taxi licence holder a lease (about \$600 a week)
5. Pay for RMS compulsory insurances (inc. \$5 million third party property, green slip and worker's comp for taxi drivers). This will total \$17,0000
6. Select only an approved vehicle (see SUTI)
7. Fit an approved meter
8. Install an approved safety camera
9. Attend 3 'taxi' inspections per year
10. Uphold a Taxi vehicle maintenance plan
11. Comply with the <http://www.transport.nsw.gov.au/sites/default/files/b2b/taxi/taxi-operator-accreditation-package-0813.pdf> which defines exactly how you will operate.
12. This includes a WHS safety system
13. Ensuring taxi driver's workplace rights are applied. See http://www.industrialrelations.nsw.gov.au/biz_res/oirwww/pdfs/Fact_Sheet_Taxi.pdf and http://www.industrialrelations.nsw.gov.au/biz_res/oirwww/pdfs/Fact_Sheet_Taxi_Drivers.pdf

Failure to comply will result in fines, penalties and variation or cancellation of the taxi operation.

The NSW Taxi Industry pays a lot of money to the NSW government and makes a lot of money for them. It neither requires nor requests any funding.

So let's go the Uber way and dispense with Licence tenure, fit and proper checks English tests, medicals, WHS (including attack/robbery safety procedures), immigration status checks, driver's licence, criminal conviction checks, standards, regulations etc. etc.

Let's trust Uber and allow them to dictate to the taxi industry and make the NSW Transport Ministry, Transport for NSW and RMS irrelevant and redundant. Let's also be naïve and pretend this won't open the flood gates to an indeterminate number of individuals and enterprises who'll follow suit.

Then we could indeed be a third world country where anyone with a car could pretend to be a taxi driver.

Ridesharing is the sharing of vehicles by passengers to reduce vehicle trips, traffic congestion and automobile emissions. Types of transportation that are considered ridesharing include carpool, vanpool, and transit or public transport.

UberX is the creation of more taxis, meaning more cars on the road, not less.

It's not sharing at all; it means simply more of the same. As more UberX 'taxis' appear there'll be more complaints, except that RMS won't be in the loop to deal with them. IPART decided that effectively no new taxis were needed for 2015/2016, so why do we need these extra bogus taxis on the roads? See <https://www.youtube.com/watch?v=vgt8Fb2m8w>

I'm fully aware of the present shortcomings in the Sydney Taxi industry and would be very willing to consult and to help provide solutions which would greatly improve existing taxi services. The model would conserve RMS/TfNSW as the major stakeholder/regulator. UberX is no solution to any of the point to point issues, but a gimmicky brash way of circumnavigating long recognised standards by a responsible regulatory authority. If allowed to operate they will neither comply nor tolerate with any form of control. It's not in their nature. Don't imagine that they're on the same level of communication. Here are some insightful quotes:

#1 Uber not only flaunts regulation, it thinks it has the right to go unregulated.

#2 When things go bad, Uber plays that always-annoying "what, who, us?" game.

#3 Uber doesn't screen its drivers adequately.

#4 Cabbies may not be angels, but neither are Uber drivers.

#5 Uber's response to the growing chorus of negativity? Slap a surcharge on their customers.

#6 Uber prices change to suit themselves. Price surging applies generally during peak demand or whenever they like. Note the price surge x 4 - Lindt tragedy.

#7 All profits and taxes will go overseas.

- Uber's terms of service: THE COMPANY MAY INTRODUCE YOU TO THIRD PARTY TRANSPORTATION PROVIDERS FOR THE PURPOSES OF PROVIDING TRANSPORTATION. WE WILL NOT ASSESS THE SUITABILITY, LEGALITY OR ABILITY OF ANY THIRD PARTY TRANSPORTATION PROVIDERS AND YOU EXPRESSLY WAIVE AND RELEASE THE COMPANY FROM ANY AND ALL ANY LIABILITY, CLAIMS OR DAMAGES ARISING FROM OR IN ANY WAY RELATED TO THE THIRD PARTY TRANSPORTATION PROVIDER.
- THE QUALITY OF THE TRANSPORTATION SERVICES SCHEDULED THROUGH THE USE OF THE SERVICE OR APPLICATION IS ENTIRELY THE RESPONSIBILITY OF THE THIRD PARTY PROVIDER WHO ULTIMATELY PROVIDES SUCH TRANSPORTATION SERVICES TO YOU. YOU UNDERSTAND, THEREFORE, THAT BY USING THE APPLICATION AND THE SERVICE, YOU MAY BE EXPOSED TO TRANSPORTATION THAT IS POTENTIALLY DANGEROUS, OFFENSIVE,

HARMFUL TO MINORS, UNSAFE OR OTHERWISE OBJECTIONABLE, AND THAT YOU USE THE APPLICATION AND THE SERVICE AT YOUR OWN RISK.

UberX employs people who can't qualify as RMS authorised taxi drivers.
So if UberX is OK do we scrap taxi driver training and authorisation?

Many jobs will be lost in the taxi industry and RMS/TfNSW (who will also lose a valuable income from the taxi industry) unless you decide to continue the discrimination against the legal taxi industry and allow UberX and many others who have spotted the weaknesses and loopholes which will allow them to thrive. And then there'll be no control whatsoever.
Should we just trust and hope that all will turn out well if we do nothing?

As for me, just let me know if I'm wasting my time with all this compliance and quality service delivery of the RMS regulated taxi industry.
Then I won't have to undergo continuous audits and compliance by myself, NSW Taxi Council, RMS and ASQA (Standards for RTOs 2015) as well as maintaining a viable business.

Oh and please return the \$365,769 and don't worry about the CPI increases.
I did buy the taxi licence from you in good faith.

Andrew Nicholas B.Ad.Ed (Tesol) JP:

CEO The Sydney Taxi School Pty Ltd RTO 90712
Trainer and Assessor NSW Taxi Council
Taxi licence owner

Australian Taxi Drivers Association

Submission to the

POINT TO POINT PUBLIC PASSENGER TRANSPORT TASK FORCE IN NSW

September 2015

The Point to Point Transport Taskforce has set out five main points for consideration:

The safety of drivers and passengers.

Ensuring good customer service and consumer protection.

Reducing costs and red tape for point to point transport providers.

How to create a more level playing field for point to point transport providers.

How to ensure that the needs of people with a disability and the transport disadvantaged are met.

It has sought comment, within the statement that “ride sharing” is unlawful, and proceeds on a number of discussion points, most of which presume the continued presence of the illegal activities of Uber X Drivers, and necessarily of the Uber App.

Relatively little has been put forward to address these points, and particularly the needs of passengers.

The central issue is that without some regulated framework in place, and despite the best intentions of all parties, none of these issues can be guaranteed or enforced. It may well be a minimalist and light handed Regulatory body, but it needs to be external and independent, and, if self-regulated in part, still have a reporting function. Whilst one mode, the taxis, have a \$50,000 a year handicap, and another, Uber X, has none, there cannot be a level playing field. Whilst one sector, the WATS, has the appearance of being subsidised, a level playing field would be the end of their services to the disabled users. Safety for Passengers is now an abstract concept. We are racing to the bottom.

Our Sydney Taxi Industry has operated for decades on the exploitation of taxi drivers, who, as Government and IPART agree, earn about ten dollars an hour as their total income; substantially less than even half the Minimum National Wage. And still the cost of fares is the major, and rightful subject of complaint by passengers. The consumer has now seen that an unregulated entrant can appear to operate on fares generally two thirds that of a taxi, and, not unreasonably chooses Uber X and blames the taxi driver for his greed and lack of service. Wrong person.

Taxi fares could reduce by a third, if the Regulatory burden of \$50,000 were removed, and if all players were subject to the same minimalist regulations as to Safety, Standards and Maximum Fares.

Government would be obliged to provide assistance for WATS / Disability Transport as a proper function of Government itself.

There is no doubt that Uber has provoked this long overdue storm, which in our view, correctly demonstrates the gross inefficiency of the Taxi Industry, and highlights its moral and financial bankruptcy. Our regret is that the Taxi Driver has for so long borne the burden of long hours, low earnings, lack of respect or self-respect, fatigue and assaults, in an unsafe workplace. This is an opportunity to redress the balance and provide the customer service, and safety, now lacking.

We, the Australian Taxi Drivers Association, look forward to a new point-to-point Public Passenger Transport System which operates on a common platform, with comprehensive recording, reporting and review of all data and occurrences in all modes, and with relatively free entry to all participant service providers. There must be some form of registration and regulation for both Vehicle and Driver.

Technology now exists to meet the needs of drivers and passengers alike, and to provide a safer environment for all participants, and at a cost substantially below existing taxi costs. We, the Public Passenger Vehicle Services, and the Taxi Industry, must take up the challenge, and move forward.

The ATDA still wants a “Fair Share of a Fair Fare”, and pledges to put the “Consumer First”.

We seek a common minimalist regulatory programme of:

Authorised and Regulated Vehicles to agreed and common reasonable Standards.

Authorised and Regulated Drivers to agreed and common reasonable Standards.

Published Standards of Service, Quality and Safety.

Regulated Maximum Fares (with passenger options)

On-line Tracking of Meters, GPS and Audio/ Video Security Systems

Recording, Reporting and Retention and Review of all Data by the Regulator

Access for Authorised purposes to all relevant and appropriate data

Taxi or Hire Car Plates available for \$1000 on condition of being driven principally by the Licensee, or as assisted by his Employed Driver.

Right to use any compliant Management System rather than an Authorised Network.

Obligation to be “on-road and available for hire” for a minimum of 250 shifts a year.

Systemic assistance to improve productivity and yield for the driver.

Australian Taxi Drivers Association

33 Burrows Rd. Alexandria NSW 2015 ..m 0419 27 27 44

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www.tda.net.au

.. a fair share of a fair fare..

POINT TO POINT PUBLIC PASSENGER TRANSPORT

Submission by the ATDA

Governments on a global scale have looked to technology to provide solutions for commerce related activities and industries to put consumers first. They have adopted a position of “consumer first”, as the priority for setting regulatory standards of Commercial activities. Technology has been embraced.

The previous decades experience of an industry in which the Taxi Plate Licensees controlled and dominated all aspects of Public Passenger Transport Services, including Regulatory matters, and created Plate ‘values’, Networks and Fares, which ensured above market returns on their ‘investments’ has been challenged by the new technology, and innovation should bring passenger services to the fore.

The modern Consumer expects that all providers of goods and services respond to his or her needs or demands, immediately, meeting all standards of safety and reliability, utilizing current technology, and at a negotiable price. There is also an expectation that the offer of a higher price will ensure priority of service to that Consumer. There is little, if any, concern for disadvantaged users and their needs.

There is a firm belief that Free Market Competition, with a somewhat contradictory overlay of a degree or form of Regulated Standards which ensure those Standards of safety and reliability as well as protection from price-gouging, will meet those expectations. There is an equally firm, and unfounded, belief that self-regulation is sufficient to provide that regulatory management.

In NSW, and in Australia generally, this is leading and has led to the “disruption” of what was a closed monopolistic and monolithic market – the taxi industry – by an even greater international corporation facilitating so-called “ride sharing” arrangements and misleading private drivers to act illegally.

There is still a potential for innovation to promote change for the better, together with appropriate regulatory settings to support the broader public benefit and ensure level playing fields for competition.

What appears to remain lost and of concern to few others than taxi drivers, and our Association, is that the changes continue to disadvantage us, the workforce in an industry which continues to exploit us, and to limit our earnings to less than half the National Minimum Wage, without entitlements, annual leave or superannuation. There is little chance that a new model will redress this exploitation.

There exists however, in Sydney alone, an action by the Transport Workers Union, to transform the Taxi Drivers Contract Determination (1984), such as would provide a \$24 an hour minimum earnings rate, the reality of Entitlements, Operator paid Fuel and Wash, and Driver Superannuation. This would be even more disruptive than Uber X. The ATDA supports these initiatives.

Uber, under the guise of disrupting an inefficient and antique model, seeks to bypass notions not only of fair competition, but of consumer protection law. The ATDA is strongly of the view that the Taxi Industry needs both disruption and renewal to provide better services for passengers, proper conditions for taxi driver workers, a safe environment for both, and regulated fares governed by fair and free competition.

For “point-to-point public passenger services” such as provided by Taxis, and by Hire Cars, around Australia, a long term pattern of “corporate creep” has permitted the development of scarcity based Plate License values and of monopolistic control of Taxis by Authorised Networks, to which vehicles are legally obliged to be affiliated, and to also effect “regulatory capture” of the market by the industry proprietors. Absentee landlord owners of taxi plates enjoy a superb superannuation scheme.

There are now consequential excessive costs, for Taxis, to the order of \$50,000 per annum, per Taxi. To date this excess has been incorporated into the Regulated Fares, to the cost of Consumers and to the benefit of Plate Licensee Owners and Networks. Fares are excessive, and the sweetener of “cheap fares” is a very effective motivation for passengers to use an illegal but available alternative transport mode.

Simultaneously, the contracted taxi drivers, who traditionally retained 50% of the Fare, or who work on a Set Pay-In notionally equivalent, can observe a reduction in both their percentile and monetary earnings and entitlements to less than half the National Minimum Wage. Generally, cabbies in Sydney earn less than \$11.00 an hour as total net income. In other areas it is usually even less, and without any entitlements, annual leave or Superannuation. At the moment it is even less than \$10.00 an hour.

This comes about as taxi passengers chose alternate transport better suited to their expectations, and in response to their service experiences with taxis. Until the emergence of “ride-sharing” concepts from Uber in Australia, and its unregulated activities, the Industry was content to maintain its position as the principal provider of passenger services, and to remain viable by the exploitation of contracted workers and the ever upwards pressure on regulated fares. What was lost to Taxis was largely taken up by increased taxi pay-ins and by additional Hire Cars, and Community Transport, within the ambit of industry control. Times have changed.

In several other Capital Cities, Uber has already emerged and taken a very substantial market share. It is also, in the form of Uber X, now poised to enter the ACT. Rather than move directly with unauthorised drivers in unauthorised vehicles operating unregistered and illegal services, as it does in those other cities, Uber is working with the ACT Government to proceed through the Taxi Industry Innovation Review. In the other Capitals Uber X simply operates illegally.

In NSW, the ATDA is assisting Russell Howarth, against whom Uber has obtained an Interlocutory Injunction restraining him from making intimidatory “citizens’ arrests” on Uber X Driver Partners and from intimidating Uber staff, to defend his actions and to make a Cross-Claim which, if successful, would put Uber X off the roads. The case is due to be heard in the NSW Supreme Court on October 6th.

Uber has been seeking to convert much of the consumer market through its “ride sharing” tactic of quoting lower prices, at least initially, to create a quick market share. They know that by not having the burden of excessive Plate Costs and Network Fees or the regulatory compliance issues to include, that they can undercut the current industry easily. They also have the benefit of an unregulated workforce in unmarked and under-equipped vehicles, free of surveillance. Contracts, if valid, are between Uber X Drivers and a company in the Netherlands, Raiser BV. The new world is a very different place.

It therefore is seeking Governmental support to create a new model of consumer market in transportation at the cost of consumer safety and social protection. The primary focus of the industry must remain the customer’s safety and level of service but should also acknowledge that the drivers’ must not face exploitation or be vulnerable to potentially illegal and amoral safety and financial practices.

Uber seeks to meet consumer expectations, and knows that it will be accepted by consumers, by avoiding the excessive costs of Taxi Plates and Network Fees, and the Regulatory burdens of a controlled, restricted and regulated system, and with an un-contracted workforce. It seeks for the NSW Government to meet consumer expectations at the cost of consumer and social protection.

Whilst the primary concern of our Association is with the exploitation of taxi drivers, and the continuance of that financial exploitation, together with the risks imposed on drivers operating illegally, by Uber X, our concerns extend to Passengers and the Industry as a whole.

If Uber X is allowed to remain in the market without regulation or compliance being ordered it will have a twofold effect. Firstly the passengers will be vulnerable, and secondly the current taxi driver, already on less than \$11.00 per hour average will be faced with even lower income through unregulated competition and therefore face 'unemployment' and the end of an Industry.

Uber X is setup for use by travellers who access their service through smart phone technology but the forgotten travellers are the aged, infirm, children and special needs sector. The Uber X business model does not include these groups, nor does it look, at this stage, to Government accounts. It has started to seek Corporate Accounts, and downplays issues of legality of its operations. The "not-so-smart" consumer is left entirely out of its transportation loop. Those without the Internet have no access. There is no Uber number.

The Issues Paper in the ACT noted as a starting point for risk assessment, that: "The ACT Government considers that it should only regulate where it is necessary to provide clear economic, social or environmental benefits". It also notes that there "needs be appropriate regulatory settings to support the broader public interest and ensure level playing fields for competition". One presumes a similar intent in NSW, and thus far these are broadly the NSW Governmental comment.

The ATDA is mindful that Uber has highlighted the deficiencies of the current system. We are mindful also of consumer expectations, and of the imperatives of cost efficiencies. We would therefore seek to improve what we have, rather than to destroy the working lives of our taxi driver members, or to put our consumer passengers at risk of both safety and service. We seek:

- Authorised and Regulated Vehicles to agreed and common reasonable Standards.
- Authorised and Regulated Drivers to agreed and common reasonable Standards.
- Published Standards of Service, Quality and Safety.
- Regulated Maximum Fares (with passenger options)
- On-line Tracking of Meters, GPS and Audio/ Video Security Systems
- Recording, Reporting and Retention and Review of all Data by the Regulator
- Access for Authorised purposes to all relevant and appropriate data
- Taxi or Hire Car Plates available for \$1000 on condition of being driven principally by the Licensee, or as assisted by his Employed Driver.
- Right to use any compliant Management System rather than an Authorised Network.
- Obligation to be "on-road and available for hire" for a minimum of 250 shifts a year.
- Systemic assistance to improve productivity and yield for the driver.

It is not just that drivers now earn a total of about \$11.00 an hour, nor that the end result is the same from Uber, nor that, with less available work, even those earnings will drop.

It is also that Passengers are exposed to risk from otherwise unauthorised and uninsured drivers.

It is that the full range of disabled, elderly and infirm, children and isolated Passengers will lose services.

It is that the assurance of regulated prices will be lost to the "freedom" of Free Market Competition to maximise profits. Unregulated "surge pricing" will be the order of the day

It is that there is another way to benefit from innovation.

The ATDA is of the view that innovative use of technology can come from within an industry regulated to the extent necessary for public safety and with the protection from abuse of excessive prices.

However there is now new technology that is capable of providing a higher level of customer service, a higher level of productivity for the driver and a very high level of safety and security for both parties. The new system is also able to comply with all the current requirements as they are understood but exceeds these being totally cloud based and secure, and available to review by authorised persons.

Regulation as it currently exists has permitted excess costs of some \$50,000 per taxi per annum to both inflate the costs of providing taxi services through fares, and to limit and reduce taxi services provided to passengers.

There is no public benefit in Taxi Plates having a \$30,000 annual cost. Nor for a Taxi Network to charge \$7,000 plus for its services, nor for the set-up costs of a taxi to add up, all together, to about \$50,000 a year. Nor does this justify a new entrant operating outside minimal regulatory guidelines, to avoid any of these costs. Rather, the issue should be to enable the reduction of costs for all players, subject to retaining public safety, service and confidence. That is the real Public Benefit.

The new technologies of Apps and Smart Operating Systems can very significantly reduce “network “ systems and fees, and should be embraced. Whilst there remains a legal obligation to be affiliated with a Taxi Network whose fees and charges are uncontrollable, or to operate on a Taxi Plate from which the licensee obtains a market rental based on its scarcity, there can be no equality of competition with those who operate outside the regulated system.

Smart Operating Systems such as massively reduce Network-type fees and initial set-up costs are ready to go, and require only that light-handed regulatory consensus.

There is a real need to drastically lower the non-economic rental and plate costs to enter the regulated environment so that competition, and indeed survival of the system, will be viable. It is vital to the public interest that a regulated, reportable and fair system is available. Massive overheads must go from the current system to ensure the market is not taken over by illegal systems of “ride sharing” that only put the public at risk.

The other major issues for the ATDA and taxi drivers generally that are not specifically addressed by the initial NSW Government Paper are:

- Utilisation and Occupancy of the taxi;
- Passenger Safety and Experience; and
- Driver Safety.

Reference to IPART Reports indicates that, as in most other Australian cities, the taxi-cab in Sydney is on the road only about two thirds of available shifts. This represents a massive waste of scarce resources, and a potential source of significantly enhanced passenger services. Utilization must improve.

Those taxis on road make a little more than one trip per hour during their shift. For whatever combination of factors, this is an even greater waste of scarce resources and a potential source of significantly enhanced driver earnings if this time was more effectively managed. Occupancy must improve.

The innovative technologies now in use by Uber X, in NSW and other States, effectively bypass these issues. By its nature and operation, it is only from a booking that a vehicle goes ‘on road’. The notion, as for a taxi, of being on the road to receive bookings and accept rank and hail jobs, does not apply. Likewise, the ‘operating costs’ of an Uber X vehicle is only incurred whilst that vehicle is on a booked trip. With this system there is no cost of inactivity. At issue is the coverage by Insurance, whilst waiting, on the way, or when “hired”

It is a solution which caters to an “on-demand” based requirement to provide cost effective services. This could be considered as “opportunistic” of the system through waiting for a booking on a just in time basis. In that sense there is a public cost benefit, but the playing field is not level. The human and financial cost to the Taxi Driver has not been considered. The benefits to the disabled are non-existent.

The driver in this style of system is “on call” without compensation for however long and only “employed” when there is a job. This suits the system and provides some benefit to the public , but none to the driver. This system could see drivers on call for far more than regulated “shifts” without pay or rest and un-noticed as there is no reporting of activity. The public safety is at risk.

This applies also to an Uber X vehicle. There is no reporting and therefore operations and suitability, standards and identification after the event are difficult at best. There being no identifiable markings navigation aids or meters etc. as currently in a taxi, the customer is not able to easily see the current status or suitability of the vehicle or the journey. A perhaps more than minor point is the permitted level of alcohol for an unregulated driver ?

The innovative technology now being developed in association with the ATDA and expected to be commercially available by November 2015, addresses many of the Utilisation / Occupancy issues.

The key issues of communication, service and safety levels to customers and productivity with safety for drivers are manageable using this new system without lowering standards or compliance but at greatly reduced costs per vehicle.

Some examples of this are in the provision of an emergency safety response system, that can be accessed by both passenger and driver, that provides audio/video and text recording of activity inside the vehicle at all times. A direct communication medium from an App allowing passenger to the driver interaction once the job is offered and accepted. A passenger may call a driver by location and preference to cut down waiting time. A driver can locate strategically into high demand areas through the ability to see activity on screen. The ability exists to pre-book a job directly onto the system by a customer and for a driver to see this request and accept the job in advance.

Every job booked into the system becomes a real job as communication is enabled immediately. This will cut “no jobs” to virtually zero thus driving up productivity immediately the system is enabled.

Customers without the smart phone App are able to call a despatch service which will connect them directly into the system and enable the same level of service from the acceptance point forward. Account holders and special needs are also enabled through the same despatch system. All payment methods currently available are enabled in the system, other than Cabcharge.

Full reporting is enabled specifically because all details of the shift activity are sent direct to the Cloud and reportable on a real time basis. The current range of devices is reduced to a single Tablet mounted securely inside the vehicle with the options of side lights, rooftop displays and tape printers available if/as required.

Currently Taxis are on the road for less shifts because drivers are not prepared to work a twelve hour shift for less than \$10 an hour which the quiet shifts average. They are getting less than a trip per hour because the operational despatch is inadequate, and relies on a driver being in the taxi, vacant and in the area to obtain a booking.

Training to do better is non-existent, because of the limited skills base of bargain price workers, and the lack of any imperative on Operators to train their drivers. Skilled, long-term drivers are always above the industry averages, but there are not many. Taxi driving is still an “entry point” job.

Interaction and communication with the passenger is a necessary part of all the new technologies. The new Apps all work well to improving electronic communication. But human contact is not a feature of any other Apps on the market. This new and specifically designed App puts a focus on direct communication from passenger to driver and also enable preferences to be applied pre booking. Requirements such as type of vehicle, special needs and favourite locations can be embedded in the system at no cost.

Safety is not necessarily a part of the current Apps. The current and Uber X proposed systems are deficient so far as regards both passenger and driver safety. The alarm systems in taxis are now wholly inadequate. The new system addresses this by having a three button safety App built into both the passenger App and the driver system that allows both parties to nominate states of 1. I'm OK 2. I feel uneasy; and 3. Emergency. In each case by the tap of a single icon. This brings in audio video and text as nominated and sends to up to 3 pre-arranged entities. These may be friends, family or emergency services for the passenger and the network or driver group and emergency services for the driver. As Uber vehicles currently have no requirements they have none of these aspects covered nor any publically known plans to do so. They do have a contact arrangement for passenger advice to a friend , but no 'alarm' as such.

Safety is a lot more than the immediate activity however and the proposed system addresses the equally important issues of data retention, and retrieval as well as recording security and the ability to recover records in the future. The current taxi 'download' sequences are a sheer nonsense.

Incident management is currently questionable in Taxis and non-existent in Uber X. The proposed system covers both internal and external activity in real time and by sending all data and records direct to the Cloud cannot be manipulated or destroyed. It is our view that all trip details should be recorded, retrievable and accessible to the appropriate authorities or parties as a mandatory safety management aspect for every trip in every vehicle in the public system. This must be at an affordable price and the proposed system enables this on all points.

It is only by eliminating the non-economic rental costs and by permitting free entry to a regulated environment, recording and reporting to a light-handed regulator that the public interest and benefit can be satisfied. Innovative technology is at hand to that purpose.

Booking, despatch and payment apps are a convenience to both passenger and driver. The fact of recording a user credit card number and a supplied identity does give a measure of security to an Uber driver, greater than when he is obliged to accept the possibility of a cash payment. Only on one card.

But Safety is more than that.

Safety requires the recording, retention and retrieval of all data, including "voice", during the trip and use of the vehicle. It requires the ability of Police, or a Regulator to "look-in" on what is happening in a taxi. A functional and functioning Alarm system. Currently questionable in cabs ; absent in Uber.

Innovative technologies which do not include surveillance, inside and outside; the potential to display the camera view, and on-line emergency access are limited and socially inappropriate for public passenger vehicles. Easy, but authorised access to stored data is an imperative. Comprehensive trip records should be a mandatory requirement for all public passenger vehicles.

PART II

This Task Force seeks to address the new paradigm of Point-to-Point Public Passenger Transport as an entirety and to encompass all the current modes. We, as the ATDA, do have a problem with the continued operation of Uber X during this time, and especially as Government has made numerous and public statements as to its illegality with the stated overarching nature of the Passenger Transport Act, both 1990 and 2014.

We do strongly support the Task Force in its objectives of reassessing the framework of our Industry, but observe inherent inconsistencies in the release, bit by bit, of Regulations empowering the 2014 Act.

The Regulatory Impact Statement on variations which go to Taxi Networks and Taxi Booking Services, and which leaves massive financial penalties for breaches, whilst making no changes or reference to Hire Cars, or the still illegal incursions of Uber X, is a statement in a vacuum. That which Uber X has placed on our table, and with merit, is the fundamental issue of Service Quality.

There are arguments about the cost of the, especially, taxi services and the level of fares reflecting those costs ; the issue of Service Quality is different, and much more difficult to assess.

The ATDA is proposing an entirely alternate Public Passenger Transport Operating System.

Part III

Consumer Outcomes

The passenger consumer will be advantaged by innovative Apps. Around Australia and the world, consumers have already turned to Apps as a best means of getting point to point transport. It is quick and easy – that is the whole point of an App. It may, or should, be cheaper.

Be it by taxi, hire car, or direct bookings of unregulated, private, vehicles, except when prices surge.

The disabled, disadvantaged, elderly and those without a ‘smartphone’ may not be so lucky.

Taxi Network Outcomes

The significantly dominant Networks in NSW will need embrace the new technology, as well as maintain existing booking / despatch systems. Currently most of the available data information is retained in-house, but there is a need for greater access by the Regulator. Most if not all required data is within potential reach, other than some aspects of on-line camera reporting.

Networks will have to consider massive reduction in their services fees.

Taxi Operator Outcomes

The owner / driver operator will be affected by continuing decline in jobs and revenue as passengers turn to other, cheaper, options. Where he has more than one taxi, and engages drivers at present, not only will his share of fare revenue drop, but he will increasingly find difficulty in engaging drivers to work for ever diminishing returns. Without absolute reduction in Plate Lease Fees and Network Fees he will be out of business. If he were to pay a fair wage, he would also be out of business.

Taxi Driver Outcomes

Taxi Drivers will see ever diminishing earnings as passengers turn away from Taxis to other cheaper point to point services. They may shift themselves into “ride sharing” drivers if they have access to reasonable and acceptable vehicles. Whilst the current regime of a twelve hour shift on-road may become an on-demand response through Uber X, and their hourly, engaged, earning rate will appear better than the current \$11 taxi earnings, the effective nett income will be much the same.

Uber X, retaining 20% of the “fare”, plus or minus GST, will and is reaping monopoly style profits. Its investment in passenger transport is not for the benefit of drivers, nor, really for passengers. It is about commercial profit to sustain the massive international investment in its activities.

Drivers will remain the half-price exploited workers of a new model industry, but one which still relies on a workforce earning less than \$11 an hour as a total income.

It remains an outrage that Governments should even consider legitimising a commercial enterprise based, in 2015, on what was, two centuries ago, slave labour. 7/11 should be a wake-up.

Suggestions that a matter for real consideration be the cost of driver licensing is puerile.

Rank & Hail and Bookings

The long term differential between Hire Cars and Taxis is that a Hire Car can only accept bookings on a pre-arranged quote and cannot “ply for hire”. The Hire Car fare is generally required not to be a metered fare, either by time or distance. The taxi has a meter, (and that’s the issue in London). The Uber model however uses both GPS based distance and time in electronically metering the fare, notwithstanding an initial fare “estimate”. Not quite the same thing.

With the Apps, the whole notion of a “booking” has changed.

In Sydney, but not outside of the Metropolitan Area, a little noticed regulatory variation now requires all non-Sydney Hire Car Booking to have been made at least 30 minutes prior to the hiring. Open to conjecture is whether this would apply to the Uber X model, if regulated, but certainly not if still unregulated. The ATDA would have this requirement on all Hire Cars.

It’s now an “electronic hail” of the nearest vacant vehicle. For Uber X the “fare estimate” is based, not on a traditional time block, but on a GPS calculated time / distance equation. Plus, on occasion, a “surge price” surcharge which puts the fare at a multiple of the equivalent taxi, regulated, fare.

Whatever may be the other outcomes, there is now a “point-to-point public passenger service” as the industry in focus, rather than either simply Taxis or Hire Cars.

Integration of Australia Wide Activities

As a truly innovative approach, we would suggest that “Public Passenger Transport” be best regulated nationally, with a single set of Regulations for Maximum Fares, Service and Safety, and the free market opportunity for regional competition for regional fares. Innovation brings the possibilities of a national system, monitored nationally. It’s more than just about State’s Rights

Insurances

At issue are the conflicting claims of adequate insurance coverage. The “regulated” industry is of the view that private vehicle, driven by private drivers, may have their insurances compromised in the event of an accident whilst carrying passengers for reward, or in the course of picking up a booked trip. Uber has a different view, but it has not as yet been tested in Australia, although there are matters in Courts overseas, in which Uber refutes liability, for when a passenger is not in the car.

The difficulties faced by taxi drivers, and with the knowledge and involvement, of the ATDA, who are involved in accidents nominally and purportedly covered by Insurance, indicate that this issue needs absolute clarity and determination.

The Fare (and other matters)

Would the new model be a “taxi-like” activity requiring full GST transactional activity and reporting ?

To whom is the fare paid ? Does the service include the booking, the carriage and the payment ?

In the new model, what is the workplace status of the driver ?

With what may be light-handed regulation, what are the penalties in breach ?

The ATDA poses some of these matters, with the expectation that, in due course, they be considered in an open forum. Most immediate is the question of reducing fares payable by the customers.

Statistics

Statistics have long been an alien concept to the Australian Taxi Industry, other than to re-inforce the monopolistic nature of its controlling stakeholders. As but one example, the Australian Taxi Industry Association has published its statistical data for several years. From 2004 to 2014 it continues to claim that, for NSW, the same 174,600,000 passengers in 97,000,000 trips are carried in each and every year, despite changes in numbers of taxis or any of a multitude of other changes. IPART and the CIE currently report 43,000,000 trips in Sydney. The ATDA notes that even this number is in decline.

In addition to the need for verifiable data on all aspects of the current Public Passenger Transport Industry, the NSW Government needs to consider the on-road effect of permitting a duality of Regulated and Unregulated Services.

In order to fully address the issues it is necessary to have an agreed and rational analysis of the current NSW Taxi and Hire Car Industry. Be it by survey or electronic data matters not. That it is statistically reliable is paramount, and has been the ignored subject of IPART requests over the last decade.

What will happen ?

If the NSW Government permits that which in other States is an illegal and unregulated so-called “ride – sharing” activity to operate in NSW, there will be a partial public benefit in that the financial cost to the consumer of “point-to point” taxi-like services will decrease. There will be additional risks to be factored against that cost saving.

However, the current taxi industry will be stressed beyond its own current cost recoveries, and will, in both fact and theoretical measure be bankrupt. Already the costs exceed revenues, and drivers are earning less than half the Minimum Wage. The solutions now available of increasing the Utilization of taxis and their Occupancy such as would increase total revenue, will not work with an influx of Uber X vehicles.

Rank and Hail work is insufficient to sustain the current taxi fleet. And electronic ‘hails’ provided by the new Apps will increasingly take that work, in any event, at a lower price.

Increased fares are not an option. Price elasticities of demand and alternative competition rule that out.

Within even the short term, the taxi industry will be marginalised. In the longer term it will not exist.

The only possibility is a massive cost reduction in the principal three “non-operating” costs – Plate Fees, Network Fees, and Insurance Charges.

This needs be linked with an across the board and light-handed Regulatory regime which applies to all participants, and creates the level playing field for free market competition.

The existing fleet will devolve into owner / driver operated Taxis and Hire Cars; new entrants, be they Uber, Lyft or simply more taxis and hire cars, will be able to ply for hire on equal terms at lower fares and create a real Public Benefit, in service costs. Unless there is a new regime of Safety and Reporting Standards, and of a solution to providing taxis for the disabled, and those with special needs, there will not be an overall Public Benefit.

One scenario is that the NSW Government takes over the entire provision of such essential services.

Another is that this review also takes regard of alternative Operating Systems, beyond mere Booking and Despatch Apps.

Part IV

The Proposed Innovative Operating System

The ATDA has been working with TAXIS.NET.AU and BEAMSMART.COM to develop a comprehensive and innovative public passenger vehicle Operating System. BEAMATAXI is now ready to be launched.

The system functions from an off-the-shelf, commercial tablet as the single device in the vehicle. It has on-line audio/video streaming, and ability to display, internal and external surround cameras. The meter is an electronic display on the tablet, and full emergency support is integrated, with remote driver alerts provided. The Roof Bar, for a taxi, incorporates a messaging bar for destinations and vacant capacity.

All functions and data are recorded, retained on the cloud, and are able to be accessed for authorised purposes both immediately and indefinitely. Meter records, GPS tracking data and all audio /video.

The system is also an electronic booking, despatch and Payment system, with call centre facilities for traditional phone users. Full access is provided for user access to trip records and lost property.

Driver sign-on and sign-off provides accessible tracking of both driver and vehicle use, to the benefit of the vehicle operator and regulator. Driver rostering and vehicle utilization maximisation flow as an automatic function, and the whole is available in, or out of vehicle.

Critically the system costs about \$350 per month as a monthly lease, as opposed to a taxi fit-out of about \$14,000 and annual Sydney Network Fees of \$7,500. A fee of \$1.00 per booking, and a 5% credit card surcharge, are the total direct consumer costs. Insurance savings will flow from newly available front and rear camera footage in the case of accidents. A new roof-bar with 360 degree camera will cost \$1000.

The massive operational cost savings, together with the security and safety features, bring about a new regulatory standard which enables the authorised industry, both taxis and hire cars to compete with an unauthorised entrant.

Part V

Networks and Plate License Fees – Why ?

Remaining at issue are two fundamental questions as to the Network and the Plate Licensing Fees. What, in current terms, are their purpose and functions ?

Uber, innovation, and technology, call these into question. So does any concept of a Public Benefit.

If the new technologies can supply cost efficient and automated mechanisms to monitor, regulate and provide surveillance of all the functions previously within the ambit of Networks, then those Networks no longer have a purpose. There is no justification for a \$7000 a year cost in Sydney.

Whatever may have been the merit of a scarcity value being placed on Taxi Plates, to be incorporated into the fare structure, for the benefit of an investor in plates, or even latterly, to the benefit of a Government, through tenders, there is no longer a public benefit. It is now no more than a non-economic rental imposed on consumers.

This is more than adequately demonstrated by the fee structure of Uber X in all other Capital Cities. And the merit of Uber is in that it has highlighted that reality. It is incumbent on this Review to question the \$50,000 a year impost on consumers.

The ATDA proposes that, in NSW, and in all other jurisdictions, licenses for Public Passenger Vehicles, be they Taxis or Hire Cars be made available for the nominal sum of \$1,000 a year on condition that they be operated and driven principally by the Licensee or as assisted by his Employed Driver. We propose that, rather than a mandatory membership of a Network, it be a condition that devices capable of recording, retaining and reporting all relevant data be installed and maintained in a Taxi or Hire Car.

In order to maintain on-road passenger services, and to avoid the use of the vehicle merely for its especial usage conditions, such as the use of “bus lanes”, we suggest that a minimum of 250 shifts of “on-road and available for hire” be made a condition of licensing, with an appropriate definition of “shifts”.

Part VI

Conclusions

This Review has a number of objectives of a seemingly divergent nature.

National Competition Policy supports regulatory review for consumer focused regulation that not inhibit innovation or protect existing business models. The NSW Government seeks a fair and equitable outcome for the existing industry providers and new entrants. The Review seeks to ensure a best possible outcome for consumers and the broader community under a framework that is fair to owners and drivers.

The issues raised, principally by Uber X, and of the need to respond to technological innovation for the public benefit, can be resolved only by a re-structuring of the Taxi Industry such as eliminates its non-economic rental costs, by accepting cost efficient total operating systems, and by massively increased productivity through improved Utilization and Occupancy.

Fares can be reduced, with improved passenger services and passenger / driver safety.

Regulation can be limited to those matters alone :

Maximum Fares : Service Standards : Safety Standards

An operating system which records, retains and reports on all activities in the taxi is both the means and the end. Provided any new entrant meets those requirements, the public benefit is assured.

An entrant, as the Operator, will make his own judgement as to financial return on investment. As an owner / driver that judgement must also include a reasonable return for his labour.

An issue is the remuneration of the driver, in addition to the owner/driver. He needs be an Employee or an Independent Contractor covered and protected by National Employment Standards.

The last point is the need to provide services to the disabled, disadvantaged and elderly members of the community. Traditionally this has been done by the Wheelchair / Maxi Taxi which has received various Governmental assistance or subsidy provided to the user, the operator and to the driver. In the new order and accepting innovation, this cannot be done by extra costs imposed on other taxis; nor by a discount on license fees as at present; it must be achieved through continuing positive assistance to cover the additional costs, or loss of fare revenue, if any, involved in providing special needs services.

Governments must also face up to their social responsibilities, and not seek to pass the meeting of essential community needs onto Taxi drivers.

Reducing fares is certainly a welcome objective, but it needs to effect no more than a neutral net result on taxi driver income per vehicle, and requires therefore the cost cuts to non-operating expenses.

Innovation is to be welcomed, and particularly when it brings general community and public benefit. Under the guise of positive innovation and “disruption”, Uber proposes a variation to public passenger transport systems which claim just such a public benefit. The underlying objective is market domination. Once the current regulated market is sufficiently disrupted, fares can be mandated both up or down, and certain, unprofitable, markets sectors simply abandoned.

This is not conjecture, it has already occurred elsewhere around the world. A 10% discount on Uber X fares has happened in Sydney and Melbourne. Possible compliance with the GST saw an overnight 10% fare increase. It's no longer a “regulated “ fare structure. “Surge Pricing” turns a \$25 trip into \$250.

In Sydney, Melbourne and Brisbane the effects of unrestricted entry of Uber X is being severely felt by Taxi Drivers in those Cities. In all the late night 'hot-spots' there is now a late night traffic jam of private cars awaiting an 'uber call', and taxi earnings are being seriously reduced.

Certainly our Australian Taxi Industry needs to cast off the consumer borne burden of excessive Plate License Fees, of excessive Network Fees, and of unnecessarily high Insurance costs. But it also needs to retain standards of service quality and quantity, of passenger and driver safety, and of regulated maximum fares. It must do so from a level competitive playing field without an imposed cost structure.

Such a field is easier to build on the valley floor than on the mountain top.

Michael Jools

President ATDA ,

Friday, 18 September 2015

Specific Comment on Discussion Points

Discussion point 1

The taskforce seeks comment on what steps could be taken to make taxi drivers' income more sustainable.

As a fundamental starting point, the Sydney Taxi Industry is not currently viable, nor are its driver's income's sustainable. Its continued operation relies on half price workers, obliged to drive unreasonable hours.

Any enterprise which fails to pay its workforce at least the National Minimum Wage, and associated Entitlements and Superannuation, and which purports to operate on a "Commission" based system without a minimum base wage is outside the law either as an Employer or Independent Contractor. In Sydney, but not elsewhere in NSW, Taxi Drivers are bailees under the NSW Taxi Drivers Contract Determination (1984), and are held to be neither Employees nor Independent Contractors, and a fair wage does not apply. To even be notionally entitled to Annual Leave a worker must drive at least 60 hours a week, over 5 twelve hour shifts.

IPART has consistently recommended Taxi Fares to Government based on Drivers earning \$10.00 an hour as the total earnings, and the Taxi Model adopts that as a primary assumption. Reworking the IPART Model to the \$24.40 an hour, and without the other claims now before the NSW Industrial Relations Commission, (Operating Expenses, Annual Leave Entitlements and Superannuation), by the Transport Workers Union, renders the Industry inoperable.

Massive increases in Occupancy and Utilization, unachievable in the context of continued Uber X operations, would almost enable legal minimums and entitlements to be paid, but only in the absence of Plate Fees and Network Charges. Increased fares are asserted by IPART to actually reduce driver income, as are a reduction in the fleet.

There are no convenient steps available to improve driver's conditions, and the issues raised as to fatigue and workplace safety require major review. It is not a question of "low compliance", it is a reality of "zero compliance", exacerbated by 12 hour shifts and dependant on a large part of its workforce breaching visa related conditions. The current action in the IRC by the TWU, of which the Task Force is aware, may well have a result which dwarfs any of the illegal "ride sharing" issues.

To permit an unregulated activity to operate with “partners”, whose only rights are to unquestionably provide services to a multinational corporation based either in the Netherlands or California, and their passengers in Australia, and to do so in the total repudiation of Australian industrial laws, and social customs is a complete folly. Uber X has raised its fares by 10%, but still advises, or more correctly, refrains from advising its “partners” about GST responsibilities. With Uber X driver incomes are already reduced and will reduce further.

Discussion point 2

Given the inconsistent application of network authorisation requirements across NSW, the taskforce seeks comment on whether the requirement for a network to be authorised is necessary at all, let alone meet complex application requirements before being able to operate, particularly in regional areas.

The Task Force appears to have had little regard to the Regulatory Impact Statement issued in relation to proposed Regulations to support the 2014 Passenger Transport Act. The Act and proposed Regulations will have significantly altered the Network authorisation requirements, and will substantially reduce the regulatory burden. In regional areas, that burden has almost disappeared, and is at worst a self-imposed set of rules.

There remains, in Metropolitan areas, a mandatory obligation to have network membership. In our view the sole purpose of this requirement is to ensure the financial survival of the existing Networks. The justification appears to be for the Training of Operators, Provision of a Duress Alarm, Retrieval of Camera Images, and Lost Property (now euphemised as “Left Property”). That which is important are the issues of Passenger and Driver Safety, which, with current technology, could be handled much more expediently than by a Network.

Regulation should be sufficiently light handed as to require a process but not to enable a bureaucracy.

The ATDA has long had argument about compliance with Network Standards by Networks. Since 2012 they have not even been published by RMS, and prior to then the critical standard of a pick-up of 85% of passenger bookings within 15 minutes of the booking had never been met. What is claimed as the performance is the very different measure of “ from the time of the booking been accepted by a driver”.

Cutting to the chase is that, with all the new apps, all this elaborate and lengthy burden on Networks, is a function able to be extracted, by any field, by an informed Regulator. Simply mandate all data reporting to be stored and be able to be retrieved by an authorised person. Put the lesser burden on the operator to utilize appropriate equipment.

Lost, or now, Left Property deserves no greater attention than in any other mode of public passenger transport. Apps which enable a modicum of searching by a passenger, and recording on an accessible data base by the driver of any “Found Property” should suffice. With global trip recording all that is lost can be found.

Discussion point 3

The taskforce is interested in views around alternatives to the universal service obligation on the taxi industry which could improve access to services for customers.

Could alternative approaches meet the objectives of universal service in a more effective way?

The first issue of the “universal service obligations” was taken to be an obligation that all taxis were to be accessible by all users, and that included wheelchair-bound users. The inelegant solution was to develop a Maxi Taxi fleet and require all Networks to have a minimum proportion of wheelchair accessible vehicles. If as above there are no Networks, this form of compliance will not work. If, also, the Plate Lease Fees reduce to say \$1000 a year, the “incentives” now available to Maxis would be ineffective.

The obligation to pick-up all intending passengers can never be absolutely universal. For Driver Safety there must be the existing exemptions. We do point out the absurdity of one of those exemptions in Section of the PTR ..

“...if the intending passenger is a person who is, ... likely to otherwise cause inconvenience, a nuisance or annoyance to other passengers or to the driver.” (extract from Clause 146)

In many cases it is the Networks’ own rules which affect service delivery. That a driver must effectively be... in the taxi...be vacant ... be in the area ... to accept a booking is inconsistent with both efficiency and customer service. A well-constructed App can improve service with pre-bookings. With job stacking and planning the issues of short trip refusals are minimised. With payment during the trip, many fears of fare evasions will change into more job acceptance. With information about the customer, the fears of a “no show” will also decrease.

Our long term objective of an “owner/ driver” model might be seen to work against 24/7 on-road presence, but the current statistics of cars on the road show that to be an irrelevance. The issues are to meet demand by supply, and that requires information – not simply an increase in the number of registered cabs, or worse, unregistered and illegal vehicles.

Discussion point 4

The taskforce invites comment on current government initiatives to encourage the availability of wheelchair-accessible vehicles.

How could these be more effective?

The ATDA supports the NSW Government’s past approach to incentivate Operators taking on wheelchair accessible vehicles. Having a \$1000 annual fee is certainly better than the \$30,000 of a Standard Taxi, but the capital and operating costs are much greater, the number of trips able to be done is less, and there is almost no opportunity to drive other than as a “one-out” driver. The pick-up fee of \$8.67 is helpful, but represents no more than extra cost of labour in the servicing of disabled users.

The primary benefit is the opportunity to charge maxi-taxi rates of one and a half the regular rate on fares. Even this does not create a substantial extra source of income, as most maxi work is pre-booked and the odd street hail at maxi rates is infrequent. Anecdotally, the benefits flow from tips of grateful group passengers.

We are however strongly of the view that the essential services provided to disabled passengers should not be performed at a cost to the taxi driver. It should not be an obligation upon a driver or operator to effectively do work at a discount, or at a commercial loss, for no reason than a discount on fees already charged at an excessive rate to other service providers. Moreover, if, as we suggest, the Plate Fees reduce to a general \$1000 per vehicle, there would be no effective discount, but a remaining cost burden to consider.

It is equally clear that the Uber X operation does not include services for other than fully mobile passengers.

Our objective is that the TTSS contribution to the user’s fare should be such that the maximum payable fare by the user is \$30.00, and that he or she pays only 50% up to that limit, as effective assistance to very needy passengers.

We would see a flat \$30.00 per trip (not per passenger) as the Lift Fee payable under the TTSS , and not from RMS Operator’s fees, as RMS now cuts its own responsibilities, for each wheelchair trip.

We would see that the current function and cost of the Zero 200 Network be transferred to such Booking Services as may wish to take on that specific area of responsibilities, and that the administration of the M40 and M50 docket systems be subsumed into app based payment systems. The continuing fraud by both driver and passengers is a disgrace, abetted by an antique system, and exacerbated by complexities.

It is up to Government to establish a sustainable ‘special needs’ transport mode, and not to pass on the burden to the Taxi Industry alone. If Trains and Buses can be subsidised, so can the WATS.

Discussion point 5

Should ridesharing services be regulated? If so, how? Is there any need to distinguish them from other booked services?

The taskforce seeks comment as to how the regulatory framework could be simplified so that point to point transport providers have more flexibility about how they provide services. Should there be fewer restrictions as to how they operate?

All Public Passenger Transport Services must be to some extent regulated for the Safety and Security of Passengers and Drivers, and to provide regulated maximum fares consistent with the services provided.

From a consumer point of view all such services provide essentially the same purpose of a transportation service, and an informed choice as to differing features, and acceptance is the only difference.

Whilst technology has blurred the notion of a “booking”, the obligations of a Taxi to accept Hirings when offered (with some exemptions) justify a restriction on other than a Taxi to only accept pre-bookings made at least a half hour prior to the hiring, and for a Taxi to be able to accept all bookings, rank or hail work.

It would be ideal to also re-classify Taxis under the Australian, or NSW, Road Rules as being able to stop on any Roadway for no longer than is required to set-down or pick-up a passenger or intending passenger.

Discussion point 6

Driver licence

Demerit points

Blood alcohol content

Use of dispatch and GPS units and mobile phones

The above rules are applied differently to different types of point to point transport drivers. How could these requirements be better applied?

These rules should be applied equally to all Registered Public Passenger Vehicle Drivers, and at all times whilst driving a PPV. A series of 'part time' rules are unworkable.

Discussion point 7

The taskforce seeks comment on whether the Government's current safety standards for public passenger drivers are reasonable.

Also, how could the processes for enforcing these standards be improved? Are there alternatives to the current system that could work more efficiently and effectively?

Currently, safety standards are inadequate, not only for drivers but also for passengers. That which is in place is also excessively costly and unwieldy. There is nothing in place to actually prevent a taxi with inoperative equipment going on the road, nor, apparently, to flag such activity.

Standards which place responsibility on three different parties – network, operator and driver- have the primary effect of each and any blaming the others. That there exists no audio recording, for whatever reason, prior to activating the duress alarm, eliminates the evidence trail, and fails to recognise that most situations arise initially with a verbal exchange before the aggression escalates into violence. Standards which maintain a once every ten second shot are, by 2015, outdated. Even the alarmed three per second is not always "live, and having a separate, untagged audio reference fails to meet evidentiary status.

The ATDA has been involved in many instances of assaults and claims in which there is simply no camera recordings available. We have personal experience of a total lack of knowledge of the procedural sequences required of Police. (even from such as the very large station at Ashfield).

The difficulties, bordering on impossibilities, of obtaining footage of a mere "runner" and fare evasion are monumental; let alone the fact that it is a discretionary choice of a police officer as to proceed with any investigation.

That there is no immediate recourse for an alarmed passenger to initiate an in-car alarm is of concern.

That which the Task Force must address are the new alternatives, such as we would present in this Submission, as our proposed new operating system.

Discussion point 8

Are there ways that the registration regime could be streamlined for point to point transport providers?

Yes. By abandonment of all regulatory functions, such as now occurs illegally with Uber X. More relevant is an across the board review of all Passenger Transport Regulations for all modes of PPV. The ATDA has already submitted comment on the whole of the Regulations in 2014 to Transport, as then requested, but the follow up has been limited to the RIS on Network and Booking Service arrangements. There remain anachronistic and inappropriate regulations in place, the removal of which would streamline processes.

Discussion point 9

It seems to the taskforce that, given the anonymity of rank and hail transport, the ability to clearly identify a taxi is important, as well as having some assurance that the vehicle is being monitored remotely. Knowing that there is a visual and electronic record not only helps to resolve matters after the event, but assists in suppressing incidents beforehand.

Having this security equipment uniquely associated with the vehicle (rather than with the driver or customer only) does appear to mitigate risks around handheld devices (such as smartphones) being switched off or stolen.

However, the current detailed, prescriptive requirements relating to the equipment and how and by whom it is to be handled, adds expense for the owner of the taxi.

The taskforce invites comment on whether the current safety and security requirements for taxis are appropriate and whether there are alternative models for how safety outcomes can be achieved.

No they are not. And, no, they need not be as costly as the monopolistic subserving system, has developed.

Perhaps the Task Force should have said “hopefully” rather than “knowing” in relation to security equipment.

It would take little effort to ensure that the absence of reporting is in itself an alarm trigger, and the logic of our operating system which incorporates meter and log-on and surveillance functions integrates both driver and vehicle as the operative unit.

What we would have is more than a bad recording after the event, or a presumed suppression of possible events, but the very simple fact of “recording of all data”, and its on-line accessibility.

Discussion point 10

The differing and sometimes quite complex additional requirements placed on the operators of different service types make it harder for them to compete effectively.

The taskforce is aware that in its recent reforms, Victoria greatly simplified the requirements for operator accreditation applicants⁶⁰. For example, applicants for taxi operator accreditation and hire car licensing are now only required to provide evidence of their identity and are subject to a criminal history check. Once accredited, operators have ongoing requirements relating to vehicle safety and working equipment.

The taskforce is interested in views on appropriate safety standards for point to point transport vehicles and how these standards may best be achieved.

For example, are there any requirements beyond roadworthiness you think are necessary?

The ATDA is of the view that “roadworthiness” is the sole required standard, and that a PPV which has three defects in a twelve month period should be de-registered as a vehicle, for twelve months, with rights of Appeal to NCAT. Any PPV must be fully roadworthy at all times, and roadworthiness for a PPV requires definitions covering all devices required for Registration.

For the individual Operator or Driver, the current end position is that he must be “fit and proper”. The variability of interpretation to which the ATDA has been a befuddled participant on many occasions, leads us to suggest that this notion must be better defined, and in Regulations, to include the concept of “being a fit and proper person for the tasks being performed”. So often it appears to be standards of even a Supreme Court Judge that are used to operate against a humble taxi driver, and the reference point is not that of a man in the street, but that of the Tribunal Officer.

Discussion point 11

The taskforce is interested in comment on insurance arrangements for point to point transport providers. How could they be improved?

For example, are there alternatives to the way vehicles are currently classified for CTP insurance?

Is it necessary to specify a minimum level of coverage for third party property insurance?

It would be anomalous for there to be differing requirements for PPV’s Insurance. In other areas of vehicle insurance, the notion of special policies related to the hours of use over a period is rejected as being impossible to police. At issue is the CTP ratings which factor taxis at 11.5 times the risk of all other vehicles. It would be very helpful to ascertain the reasonment, and, if it were valid, to assess the risks of all PPV’s.

Within the Insurance issues is the very imprecise indemnification of Taxi Drivers by Taxi Operators.

Discussion point 12

Customer satisfaction with fares is low. Customers perceive fares as too high and have low levels of trust in the correct amount being charged.

Could fare regulation be simplified for the benefit of customers?

Do you have any other suggestions about how information to customers could be improved?

Whilst existing Regulations require that an approved meter be in operation for all taxi trips, there are multiple instances of drivers “agreeing” on a set fare, of not operating the meter, and of practises of illegally tampering with the meter. Hire Cars are required to charge only the fare quoted at the time of booking, and the illegal Uber X drivers are generally observed to have an estimated fare, varied by total elapsed time and total distance, with additional “surge pricing” factors.

Fares for Taxis are as recommended by IPART and determined by Transport NSW. Dissatisfaction by consumers is recognised, but to direct that at Taxi Drivers is inappropriate, and especially so when the absolute majority of Method II bailee drivers earn but \$10.00 an hour as their total income. Those fares are maximum fares and, theoretically, a driver can charge less than the maximum – in the real world, never.

IPART has, for over a decade, put up for discussion the taxi fare structure, with responses from but the ATDA.

Without comprehensive data on taxi trips, which would now appear even more unlikely, unless the recommendations of the ATDA are accepted, a proper assessment of fares will never happen.

We note that, despite Regulations, the vast majority of Taxi meters are placed so as to be not visible to passengers in the back of a taxi, and are almost always obscured by the gear stick. Many are so poorly lit as to be unreadable in daylight.

A particular point is the illegality of requesting / demanding payment of the fare prior to the termination of the trip. Firstly is the lack of any clear definition of when a fare is terminated – on arrival or on payment. And secondly the inability to legally process by electronic means of an agreed final fare during, or before the trip.

Discussion point 13

Given the apparent customer dissatisfaction and confusion about taxi fares, it is understandable that some regulators are moving to amend meter standards to provide better clarity for customers. All the same, the taskforce's terms of reference highlight a need to lower the burden of regulation on the industry.

The taskforce seeks comment as to whether there should be any changes to the way fares and meters are regulated, and whether new technologies offer new opportunities at a relatively low cost to industry.

This point goes to the issue of Regulations being prescriptive and or descriptive, and, not simply outcome focused in the interests of minimalism. All that is needed is for the Regulation to do no more than require a meter capable of displaying and recording all elements of the fare, and to be secure. Should a breach occur in a regulated vehicle (a PPV), it would render the vehicle un-roadworthy, as above.

New operating systems are able to include a GPS based meter within the general display, and many of the current prescriptive requirements are redundant.

Discussion point 14

The current prescriptive regulatory requirements aimed at ensuring service quality place additional costs on operators and drivers, particularly in the taxi industry. Should service quality be subject to regulation?

Are there alternative ways to ensure service quality for point to point transport customers?

Regulation as to Service Quality has proven to be almost impossible to achieve. Where Key Performance Indicators have been determined on Networks, their utility can be observed best by their lack of results publication by RMS. Where a KPI has a meaningful application, its breach is overcome by re-definition.

Where, years ago, it was determined that all cabs be "white", now they are in any rainbow colour as suits a Network. We are about to see "Black TCS" as a new label. While driver uniforms are mandated, the provision by operators to their drivers, and the maintenance of basic laundry standards is almost totally absent.

A key complaint, that of the driver not turning up to meet the booking, on time or at all, could be addressed by modern communications. But an antiquated concept of privacy, and a lack of comprehension of the new technologies restrains driver from being able to readily contact their passenger or *vice versa*.

Discussion point 15

Should the government manage the supply of taxi services?

If so, how should they be restricted (for example, through a cap on the number of taxis allowed to operate)?

Should there be different arrangements outside Sydney?

Discussion point 16

Should there be any restrictions on where taxis can operate? If so, how many taxi and hire car operating areas are required across NSW and why? What are the options for broader operating zones?

Discussion point 17

Should the Government manage the supply of hire car services? If so, on what basis?

On these three points the position of the ATDA is that there is no need for regulation of supply or area of operation for either taxis or hire cars. Provided the minimal regulatory standards are met, it is or should be, a free market competitive decision of an entrant to the industry to join the industry where and when his economic decision determines. The regulation of maximum fares is the significant issue.

Discussion point 18

At this stage, it is too early for the taskforce to say what the likely impact of any change would be, so detailed consideration of any possible adjustment package is not possible.

Nonetheless, the taskforce invites comment on whether industry adjustment assistance should be considered, and if so, how it might be structured.

It has been made clear on Governmental websites and in Information publically provided, in recent years, that the choice to enter the Taxi and Hire Car Industry is the whole responsibility of the proposed entrant, and that no assurances or guarantees are offered by Government.

It is our view that some form of “hardship assistance” be made available, on a case by case basis to Plate Owners of less than three plates within their family or corporate entities. Such assistance should take into account the financial advantages obtained by the past operation of the Plate, and its original cost. Where the Plate was obtained without cost, there should be no issues as to compensation.

Where corporate entities or family holdings own three or more Plates, there should be no issues as to compensation.

In conclusion

The Point-to-Point Task Force has been created because of the convergence of various forms of Public Passenger Transport. Technology and the omni-present Apps have blurred the distinction between Taxis and Hire Cars, and modernity has opened up unregulated variants – ‘ride sharing’.

But instead of seeking to unify, and rationalise the “Regulations” in one common, and light handed, framework, it would appear that this Discussion Paper intends an ever more complex and fragmented set of rules. It would have lost sight of the Government’s “Consumer First” mantra.

Point-to Point Public Passenger Transport is about transporting consumers with reliability and choice, in safety and convenience to and from their pick-up and destination. It should be readily available, with acknowledged price restraints, at all times from all locations, and on time for an accepted booking, or within a reasonably short waiting time. The whole of all trips should be recorded and be available for authorised purposes for the safety of both passenger and driver.

There should be no differences in the quality or safety of whatever form of public transport.

The reality is that one set of Regulations, common to all forms of transport, should be able to meet all the Consumers needs and expectations.

That means a common registration of all vehicles such that if not fully roadworthy, they are deregistered. It requires only that all PPV’s are complaint and roadworthy when equipped with a device on-line at all times whilst been driven that retains and reports all data of GPS Tracking, Audio/Video, Alarms and Metering to a data base capable of being accessed for an authorised purpose.

That means that a Driver of such a vehicle must have current registration as an authorised driver of a PPV. The endorsement of his personal driver's license limits the particular vehicles he may drive. He needs be a "fit and proper person" to no more than the extent of his job responsibilities.

In seeking comments on yet more regulations, which the ATDA is pleased in any event to provide, the Task Force has only complicated its function.

The objective, having recognised the reality of convergence, is to regulate to a minimum.

And the focus of Regulation must be to ensure the priority of the Consumer / Passenger as to Safety, Reliability and Convenience and with much lesser perception for a need by the Regulator for encompassing powers to control an industry of which it is clearly losing control.

The needs of existing stakeholders to manipulate regulatory oversight such as to maintain their monopolist exploitation of the Public Passenger Transport Service must be set aside entirely.

Transport Minister Andrew Constance said, after the September 10th Taxi Driver Rally in Sydney :

"Technology is not going away here, so what we're saying is let's get the regulations right."

The Passenger Transport Act 2014 requires revision even before it gets enacted, and we need an interim but comprehensive Passenger Transport Regulations 2016 to enforce and empower the NSW Public Passenger Transport Service to the benefit of the consumer, and to recognise the rights of an employed workforce - *" let's get the regulations right."*

ATDA

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.. a fair share of a fair fare..

POINT TO POINT PUBLIC PASSENGER TRANSPORT

Supplementary Submission by the ATDA

The Sustainability of the Taxi as a Public Passenger Vehicle.

Every business operating in Australia, and employing workers is obliged to pay Wages and meet the National Employment Standards. Those who contract with Independent Contractors are required to have a fair contract of no less disadvantage than as for an employee.

Every business other than a Taxi Service.

In NSW the Government regulated fares are based on drivers earning \$10 an hour.

This exploitation of the “bailee” taxi driver, without Entitlements or Superannuation, has been the basis of the Taxi Industry “cost structure” for decades, and any notion of viability or sustainability of the Industry which does nothing to redress that situation, does no more than continue the exploitation. If all Operators were to pay legal entitlements, the Industry would be closed down overnight.

Josh Borstein of Maurice Blackburn Lawyers in a letter to Prime Minister Malcolm Turnbull said in relation to 7/11 staff: “ .. The scale of the underpayment and the nature of the exploitative mistreatment of the employees is difficult to reconcile with a modern, prosperous Australian society ..”

Likewise the exploitation of taxi drivers.

Taxi Drivers are neither Employees nor Independent Contractors. They are Bailee Slaves

Years of IPART Reviews and Government Regulated Fares have presumed Driver Costs / Wages to be whatever is left over from Fares after having paid all Operational and Non Operational Costs. IPART does not even include the cost of Annual Leave as a component of its Taxi Cost Index.

Currently that “labour cost” is less than \$10.00 an hour, as total earned income. It is neither sustainable nor viable. It is however the reality of workers in a last resort situation – that’s as good as it gets.

Certainly the Taxi Industry is operating, but it is doing so on the basis of a massive underpayment of its primary workforce. The very notion of sustainability is an absurdity.

Exacerbating the situation is an excessive burden of \$50,000 a year per taxi of Plate License Fees, Network Fees and unjustified Insurance Charges. Uber and its illegal “ride sharing” can offer fares that do not include these costs – but still which pay the driver a nett \$10.00 an hour – and be a third cheaper than a taxi, except for when “surge pricing” is applied.

The fundamental issue is that, even if the \$50,000 in non-operational costs are removed, and assuming a 14 shift x 50 week on-road performance, legal minimum wages and conditions will only be affordable with an increase in taxi occupancy of about 20%, bringing back the rate of occupancy to Year 2000 levels. Since then, be it because of fleet size increases or consumer demand decreases, occupancy has dropped to about 13 jobs a shift. Unless the illegal ride sharing is entirely stopped, this reversal of taxi occupancy trends cannot happen. Worse is that unless the costs are decreased, the available revenue for drivers will still not meet National Standards.

Before the NSW Industrial Relations Commission is a revision of the Taxi Drivers Contract Determination for Sydney Drivers, by the Transport Workers Union, which, if successful, would set a minimum earnings of \$242 a 10 hour shift, absolute entitlements for paid annual leave, and sick pay, payment for fuel and wash and Superannuation. Effectively \$35 an hour. Compliance will be enforceable, and the consequences will disrupt the Industry far more than Uber has done. But still no more than an equivalent minimum wage, such as any business is required to meet as an operating cost.

At that rate Operators would fill all shifts – and go broke, if they still have to pay Plate and Network Fees. Only if average fare revenue of about \$480 per shift were to be achieved, together with the elimination of excess non-operational costs, is the industry sustainable.

At the moment the average shift revenue is about \$300. An extra 10 jobs a shift is nigh impossible.

Additionally if the current reality of a shift-by-shift cost / revenue balance is maintained, there is no hope of sustainability. It requires the nature of a weekly employment regime to balance shifts, and over day / night shifts, to provide average earnings from disparate revenue. An Operator, paying minimum Driver Expenses as per the TWU claim, on current revenue, would be losing about \$200 per day shift, making money only on weekend nights.

In the on-going presence of an un-regulated Uber X, the situation is absolutely irreconcilable.

If driver earnings were to be at a minimum of effective \$35 an hour, payable by the operator, there would be no shortage of drivers for the maximum of 14 shifts times 50 weeks, and the number of cabs on the road, given that only 65% are on road at present, would create an over-supply for existing demand. Demand is being fully met at the moment by Uber X offering fares at a discount of about 40%.

Only by the taxi industry offering booked fares at a about a 50% discount on the regulated maximum fare, would there be a transfer back to taxis, and an absolute increase in demand. Given a market share of, normally, 20% as booked taxis in Sydney, such a solution is workable if unpalatable, and possibly uneconomic. An assumption of Price Elasticity of Demand similar to IPART, is part of our mathematics.

Fare increases do not assist as their elasticity would cancel out supply increases.

It remains therefore a necessity to find ways of increasing occupancy so as to provide a sufficient gross revenue to meet all legal obligations of taxi operations. The taxi operating systems need be changed, together with customer usage to provide two jobs an hour, or at least 20 per shift. It may also be reality that there are too many cabs on the road – and that is the conclusion of most professional taxi drivers.

And, as fundamental questions ... Does a sustainable Public Passenger Service require Subsidies in a context of regulated fares ? Will an unregulated competitive market still meet standards of Safety and Service and without consumer disadvantage from fare gouging ?

The following table sets out the mathematics of our problem, and highlight the alternatives. We have increased some cost items to allow for greater utilization, but the full modelling is in the background.

We seek as a solution, a common minimalist regulatory programme for all Public Passenger Vehicles of:

- Authorised and Regulated Vehicles to agreed and common reasonable Standards.
- Authorised and Regulated Drivers to agreed and common reasonable Standards.
- Published Standards of Service, Quality and Safety.
- Regulated Maximum Fares (with passenger options)
- On-line Tracking of Meters, GPS and Audio/ Video Security Systems
- Recording, Reporting and Retention of all data, and Review of all Data by the Regulator
- Access for Authorised purposes to all relevant and appropriate data
- Taxi or Hire Car Plates available for \$1000 on condition of being driven principally by the Licensee, or as assisted by his Employed Driver.
- Right to use any compliant Management System rather than an Authorised Network.
- Obligation to be “on-road and available for hire” for a minimum of 250 shifts a year.
- Systemic assistance to improve productivity and yield for the driver.

Michael Jools

President ATDA

Thursday, 24 September 2015

Sydney Taxi Data 2014		ATDA Submission		Sydney Taxis 2015							CIE Data 2014							Night Shifts							Total							
Current Position				Day Shifts																												
				Mon	Tue	Wed	Thurs	Fri	Sat	Sun	av day		Mon	Tue	Wed	Thurs	Fri	Sat	Sun	av night												
Average Fare Revenue																																
IPART 2014	exc GST	\$	245.67	\$	239.04	\$	241.95	\$	250.71	\$	257.40	\$	243.86	\$	252.11	\$	222.07	\$	237.27	\$	258.66	\$	290.98	\$	370.16	\$	368.30	\$	222.58	\$	3,700.76	
	GST inc	\$	270.24	\$	262.94	\$	266.15	\$	275.78	\$	283.14	\$	268.25	\$	277.32	\$	271.97	\$	244.28	\$	261.00	\$	284.53	\$	320.08	\$	407.18	\$	405.13	\$	2,448.84	
Average Market Pay-Ins	GST Inc	\$	129.30	\$	128.90	\$	129.60	\$	129.60	\$	131.40	\$	118.20	\$	117.20	\$	135.10	\$	146.00	\$	154.90	\$	166.00	\$	187.40	\$	183.70	\$	115.80	\$	1,973.10	
Operator Revenue	GST Exc	\$	114.59	\$	115.20	\$	114.74	\$	115.25	\$	115.02	\$	101.16	\$	100.72	\$	119.98	\$	129.64	\$	140.66	\$	150.25	\$	170.72	\$	162.66	\$	104.41	\$		
Fuel & Wash	SST Inc	\$	27.63	\$	25.49	\$	26.16	\$	26.18	\$	27.31	\$	28.24	\$	32.01	\$	38.97	\$	39.91	\$	41.25	\$	43.79	\$	47.85	\$	48.62	\$	40.10	\$	533.77	
Average Driver Retention	GST Inc	\$	110.54	\$	106.01	\$	107.77	\$	117.38	\$	121.70	\$	118.98	\$	124.91	\$	66.31	\$	71.10	\$	84.25	\$	105.91	\$	167.14	\$	167.95	\$	84.93	\$	1,554.88	
	GST Exc	\$	103.45	\$	98.35	\$	101.05	\$	109.28	\$	115.07	\$	114.46	\$	119.38	\$	63.12	\$	67.72	\$	76.75	\$	96.94	\$	151.59	\$	157.02	\$	78.07	\$	1,452.25	
Trips			11.8		11.94		12.3		12.88		13.45		13.82		14.71	13.0	12.53		13.18		15.12		16.3		21.67		21.84		14.18	14.6		
Hours			10.05		10.07		10		10.58		10.58		10.28		10.63		9.55		9.86		10.54		10.43		11.24		11.16		9.58			
Driver \$ per Hour	GST exc		9.77		9.83		10.19		10.35		11.03		10.58		11.47		7.79		8.54		9.51		11.31		15.05		15.21		10.16			
Calculated Hourly Rate	non cie	\$	10.29	\$	9.77	\$	10.11	\$	10.33	\$	11.51	\$	11.13	\$	11.23	\$	6.61	\$	6.87	\$	7.28	\$	9.29	\$	13.49	\$	14.07	\$	8.15	\$		
TWU Safety Net Flat Rate	24.32		243.2		243.2		243.2		243.2		243.2		243.2		243.2		243.2		243.2		243.2		267.52		291.84		291.84		243.2		\$ 3,526	
Fuel & Wash	GST Inc		27.97		28.19		29.08		28.86		30.19		31.19		32.86		41.64		42.75		44.41		46.85		53.29		53.51		42.97		\$ 534	
Annual Leave etc			36.48		36.48		36.48		36.48		36.48		36.48		36.48		36.48		36.48		36.48		40.128		43.776		43.776		36.48		\$ 529	
Superannuation			25.54		25.54		25.54		25.54		25.54		25.54		25.54		25.54		25.54		25.54		28.09		30.64		30.64		25.54		\$ 370	
Total Driver Expense			333.19		333.41		334.30		334.08		335.41		336.41		338.07		346.85		347.96		349.63		382.59		419.55		419.77		348.19			
Operators Operating Costs		\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	125	\$	1,750	
\$66750 / 530	700 SHIFTS	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$	95	\$		
all inclusive costs	700 + Costs down	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$	55	\$		
Operator Situation																																
\$30 shifts		-\$	187.95	-\$	195.47	-\$	193.15	-\$	183.30	-\$	177.27	-\$	193.16	-\$	185.75		-\$	227.58	-\$	211.97	-\$	190.10	-\$	187.51	-\$	137.38	-\$	139.64	-\$	228.35	-\$	2,639
700 Shifts		-\$	157.95	-\$	165.47	-\$	163.15	-\$	153.30	-\$	147.27	-\$	163.16	-\$	155.75		-\$	197.58	-\$	181.97	-\$	160.10	-\$	157.51	-\$	107.38	-\$	109.64	-\$	198.35	-\$	2,219
700 Shifts + reduced costs		-\$	117.95	-\$	125.47	-\$	123.15	-\$	113.30	-\$	107.27	-\$	123.16	-\$	115.75		-\$	157.58	-\$	141.97	-\$	120.10	-\$	117.51	-\$	67.38	-\$	69.64	-\$	158.35	-\$	1,659
OCCUPANCY INCREASE			400		400		400		400		450		450		400		480		480		480		550		650		650		480		\$ 6,670	
EFFECT :																																
IF TRIPS INCREASE TO 18		-\$	125.80	-\$	123.12	-\$	123.96	-\$	123.98	-\$	75.40	-\$	76.56	-\$	131.27		-\$	59.97	-\$	61.15	-\$	62.82	\$	7.52	\$	110.89	\$	110.12	-\$	61.38	-\$	797
IF SHIFTS INCREASE TO 700		-\$	95.80	-\$	93.12	-\$	93.96	-\$	93.98	-\$	45.40	-\$	46.56	-\$	101.27		-\$	29.97	-\$	31.15	-\$	32.82	\$	37.52	\$	140.89	\$	140.12	-\$	31.38	-\$	377
IF OP COSTS REDUCE BY \$30 K		-\$	55.80	-\$	53.12	-\$	53.96	-\$	53.98	-\$	5.40	-\$	6.56	-\$	61.27		\$	10.03	\$	8.85	\$	7.18	\$	77.52	\$	180.89	\$	94.71	\$	8.62	\$	98

Question 1 – What, if anything, needs to change in the point to point industry to better ensure? NSW Government must insure that Taxi APP providers are accredited by the NSW Department to insure such Taxi APP service providers adhere to Australian privacy policy. Presently a number of overseas Taxi APP providers are providing an application service via overseas Taxi Applications and the NSW government has not control over the privacy or delivery of such applications.

Dear Sir Madam

Here is an example in real life where you can't say that if a passenger is pickup by an APP is safe. The point to point task force must recommend all public vehicle gave camera as this day and age the technology is readily available and affordable.

<http://m.goldcoastbulletin.com.au/news/crime-court/gold-coast-woman-suffers-suspected-broken-leg-and-blood-clot-in-alleged-uber-driver-attack/story-fnje8bkv-1227515381221>

Question 2 – How can costs and red tape for point to point transport providers be reduced?

Transport inspectors given the power to fine illegal taxi operators using licence demerit points of 3 points first offence, 6 points second offence and confiscate car third offence. current law to take uber drivers is not working.

NSW Government needs to legislate simple policing of illegal Taxi point to point providers and being able to confiscation their vehicles instead of the current lengthy process of going to court. Which is simply bogged down in legality to prosecute making the NSW government look inept. Simple loss of licence will stop this behaviour quickly and less costly than court.

Question 3 – What would create a more level playing field for point to point transport providers?

Uber drivers must pay a licence fee for driving and if attached to an application provider pay a per kilometer fee payed to NSW government.

Why should Uber drivers and Uber company make profit while the government make no return on using NSW infrastructure.

24 September 2015

Taskforce Regulation of Point to Point Transport
Level 7,
12 Castlereagh Street
Sydney NSW 2000

pointtopoint@transport.nsw.gov.au

Insurance Australia Group (IAG) welcomes the opportunity to make a submission in relation to the NSW Government's Point to Point Transport Taskforce Discussion Paper.

Who is Insurance Australia Group?

IAG is the parent company of a general insurance group with controlled operations in Australia, New Zealand, Thailand, Vietnam and Indonesia, employing more than 15,000 people. Its businesses underwrite over \$11.4 billion of premium per annum, selling insurance under many leading brands, including: NRMA Insurance, CGU, SGIO, SGIC, Swann Insurance and WFI (Australia); NZI, State, AMI and Lumley Insurance (New Zealand); Safety and NZI (Thailand); AAA Assurance (Vietnam); and Asuransi Parolamas (Indonesia). IAG also has interests in general insurance joint ventures in Malaysia, India and China.

As one of the largest motor vehicle insurers in Australia, this topic is of significant relevance to IAG's Australian businesses and the insurance industry more generally. IAG views the developments in the transport sector to be an indication of consumer preference. There is a need for industries and governments to evolve and adjust to the changing business environment.

In NSW IAG has made a discretionary decision to insure customers who occasionally use their vehicles for Uber. The cover offered by IAG is an interim measure to limit the exposure of IAG's customers until governments are able to provide greater certainty about the legality of, and the regulations that apply to non-traditional transport providers.

Clarity and consistency is required in the regulatory treatment of emerging alternative business models to provide certainty for businesses and their customers. This in turn will encourage adaptive innovation, ensure sustainability of insurance schemes and improve consumer outcomes. There is also a need for regulation of minimum standards to protect consumers and drivers and raise the bar for safety across the broader transport industry. Given that ridesharing services have been available in Australia since 2009, a clear regulatory response is long overdue.

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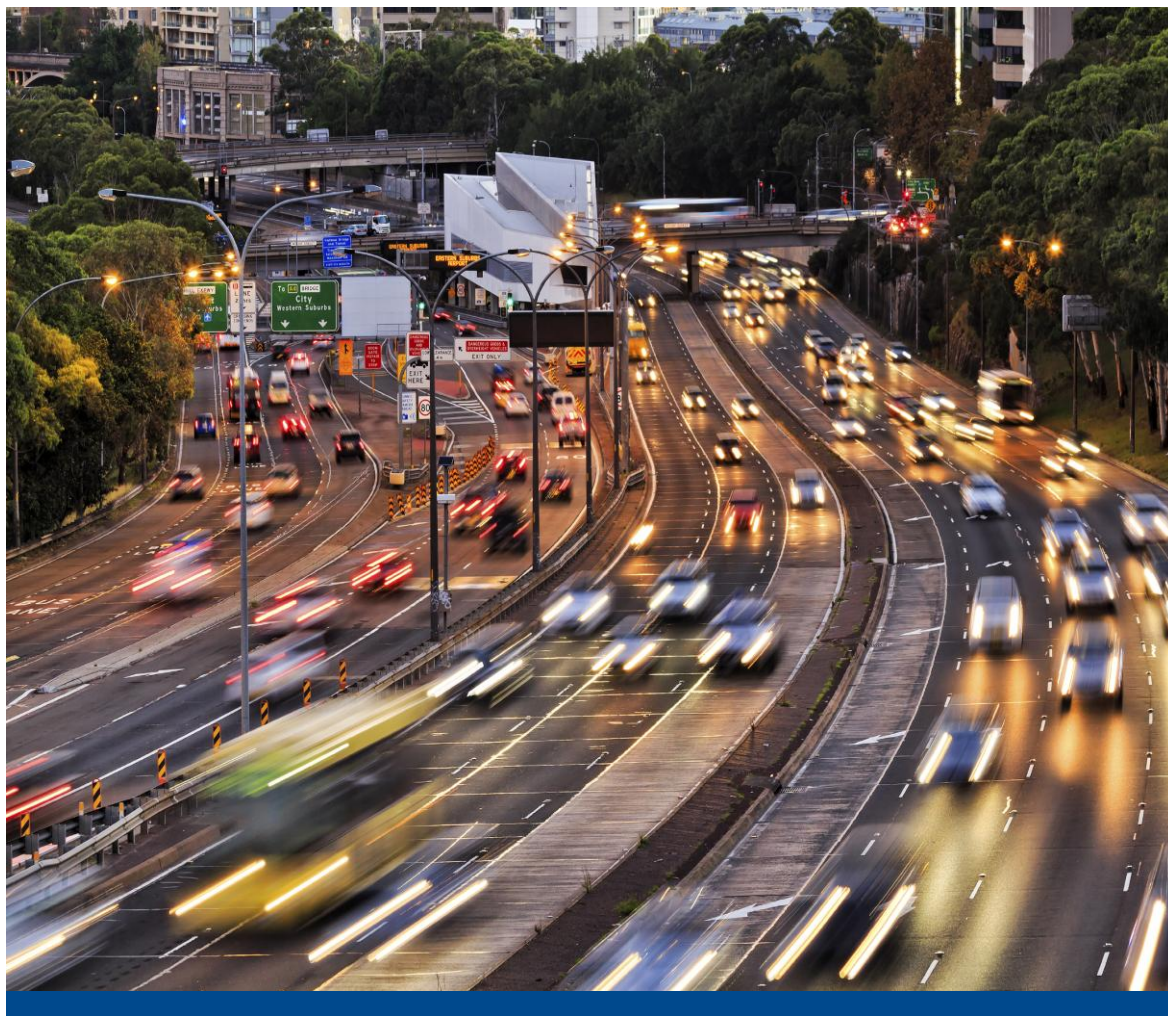
IAG's submission focuses of the challenges and areas of risk specific to insurance cover for individuals who participate in ridesharing activities.

If you wish to discuss this matter or make further inquiries please contact Gulshan Singh, Manager, Public Policy & Industry Affairs on (02) 9292 8907.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Cornish'. The signature is fluid and cursive, with the first name 'Andy' and the last name 'Cornish' clearly distinguishable.

Andy Cornish
Chief Executive Personal Insurance
Insurance Australia Group



NSW POINT TO POINT TRANSPORT TASKFORCE 2015



24 September 2015

CONTENTS

Table of Contents

Disruption of Traditional Business Models	3
Motor Insurance	4
Compulsory Third Party Insurance	9
Safety	10

DISRUPTION OF TRADITIONAL BUSINESS MODELS

a) Technology

Disruptive change has always been a fact of life for many industries, yet unprecedented advances in technology are accelerating this change. Traditional businesses need to adapt to the rapidly changing landscape despite the uneven playing field in government regulation, compliance and licensing. IAG's approach to disruption is to ensure that IAG stays relevant and customer-centric in a fast-changing and increasingly competitive environment.

To reflect the growing importance of digital progress, IAG has created a dedicated innovation hub - IAG Labs, and appointed a Chief Executive to drive digitisation and innovation across IAG. IAG Labs recently developed Sharecover, an insurance product to support the tens of thousands of Airbnb and Stayz hosts who may be unknowingly exposed to risks when they invite guests into their homes.

IAG appreciates the concerns and challenges faced by the taxi industry and traditional transport providers. Greater regulatory certainty around the new digital technologies and emerging alternative business models will assist all stakeholders to assess and respond to the challenges and opportunities they present. International experience suggests that attempts to prohibit ridesharing services will be difficult. Uber now operates in 58 countries with numerous competitors appearing such as Lyft, Sidecar, Haxi and Hailo. The popularity of ridesharing is clearly a reflection of consumer sentiment.

b) Customer empowerment

The balance of power between organisations and individuals has shifted significantly. Customers now have unparalleled choice, information and influence. They are setting high standards for the service and experiences they expect. Customers have a greater voice with word-of mouth advocacy amplified on social media. They constantly use social-media platforms to seek and share information. Social media also allows business to engage with customers like never before.

Customers now expect personal solutions that reflect and anticipate their needs and that adapt to their changing circumstances. Polls have revealed that consumers currently take advantage of sharing economy services primarily because they offer greater convenience, better prices, and higher quality¹.

¹ <http://mercatus.org/publication/sharing-economy-and-consumer-protection-regulation-case->

MOTOR INSURANCE

Discussion point 11

The taskforce is interested in comment on insurance arrangements for point to point transport providers. How could they be improved?
Is it necessary to specify a minimum level of coverage for third party property insurance?

There is considerable confusion and uncertainty about the application of personal insurance policies to ridesharing for both drivers, users of the service and insurers. Participants in the shared economy may unknowingly expose themselves to significant financial risk. Alternatively, individuals may be deterred from participating in the shared economy because of fears that they may not be covered. Regulatory clarity will enable individuals to make informed decisions about offering or using these services and to take the necessary steps to manage their risks.

The immediate concern for consumers who are using their private vehicles to provide ridesharing services is whether they are covered for motor vehicle property damage (comprehensive or third party property) given that they are using the vehicle for a purpose other than private use. Generally speaking, policies for home or motor insurance do not extend to cover activities of a commercial nature.

a) Insurance cover

i) How insurance works

To appreciate the challenges posed by providing insurance cover to ridesharing services, it is necessary to have an understanding of how insurance risks are assessed. In Australia premiums are generally 'risk rated' and the price differs depending on the policyholder's level of risk (although sometimes a mix of community rating and risk rating is used). Data from a range of sources are used to develop an actuarial risk model that estimates the frequency and cost of future claims by looking at risk factors. The more likely the event is to occur, the higher the risk to the insurer and, as a result, the higher the cost of the premium.

The challenge with emerging services such as ridesharing lies with the limited information available (such as claims history and accident data) to assess the associated risks. To fully fund an insurer's liabilities, premiums must be sufficient to meet the cost of claims when they are settled. The level of uncertainty around ridesharing and variation in the way people use their vehicles for ridesharing makes it difficult for insurers to ensure that the premium collected is sufficient to cover claims and operating costs, as well as produce a profit for the business.

MOTOR INSURANCE (CONTINUED)

ii) Types of insurance cover relevant to ride sharing

The Discussion Paper identified issues with CTP, Third Party Property and Workers Compensation Insurance. The types of insurance that are relevant to ridesharing are outlined below.




Comprehensive Motor Insurance	<ul style="list-style-type: none">• Optional insurance that covers damage to your own vehicle and other people's property, as well as theft and some other risks, plus legal costs.
Third Party Property	<ul style="list-style-type: none">• Optional insurance that covers damage to other people's property and legal costs, but not damage to your own vehicle
Third Party Fire & Theft	<ul style="list-style-type: none">• Third Party Property with some add-on features that cover your vehicle
Compulsory Third Party (CTP)	<ul style="list-style-type: none">• Mandatory insurance cover in NSW that protects any person that you might injure while you are driving including passengers in the car
Workers Compensation	<ul style="list-style-type: none">• Mandatory insurance foremployers in NSW . Covers any of the employer's workers in the event of them suffering a work related injury or illness.
Income protection	<ul style="list-style-type: none">• Optional insurance that replaces the income lost through inability to work due to injury/ sickness. Especially suitable for self-employed people, small business owners
Personal Accident Insurance	<ul style="list-style-type: none">• Provides income protection foran injury or illness that prevents you from completing your normal work duties. This can provide cover for the home-based business owner who does not have access to sick leave

iii) Application of insurance cover to ridesharing activities (current state)

The rapid pace, at which ridesharing services have grown, in conjunction with inconsistent legal interpretations, has created a gap in insurance cover. There is considerable misinformation and confusion about the insurance implications of using a vehicle for ridesharing in motor vehicle policies, in particular third party property and comprehensive car insurance. Given the legal ambiguity surrounding ridesharing, there is a high level of uncertainty about how an insurance policy will be applied as a result of an incident. Additionally, motorists who offer ridesharing services are unsure of what they could be liable for, what policies they should take out and what is available.

Existing insurance policies cater to either commercial or private use of an asset. Digital disruption, by connecting individuals, is blurring the distinction between personal and commercial asset use. Current personal insurance policies are unclear if they provide cover when a person uses their personal asset (e.g. home) for commercial purposes. In some instances, there is a clear gap (e.g. malicious damage) and in other cases it is grey or subject to interpretation (e.g. liability). This is particularly relevant in the case of ridesharing where the use of the insured vehicle is often a combination of private and commercial activity that varies considerably between different drivers.

MOTOR INSURANCE (CONTINUED)

	Driver 	Passenger 	General Public 
Compulsory Third Party Insurance (CTP)	Only covered if another driver is at fault.	Covered under the driver's compulsory CTP insurance	Covered under the driver's compulsory CTP insurance
Comprehensive Motor Insurance	May be liable for the costs of damaging own vehicle or another person's property.	May be exposed to loss if the driver is uninsured or the insurer does not cover ridesharing	May be unable to recover costs if property damaged by a driver who is uninsured or the insurer does not cover ridesharing
Third Party Property	May be liable for the costs of damaging another person's property.	May be exposed to loss if the driver is uninsured or the insurer does not cover ridesharing	May be unable to recover costs if property damaged by a driver who is uninsured or the insurer does not cover ridesharing
Third Party Fire and Theft	May be liable for the costs of damaging another person's property.	May be exposed to loss if the driver is uninsured or the insurer does not cover ridesharing	May be unable to recover costs if property damaged by a driver who is uninsured or the insurer does not cover ridesharing
Workers Compensation	Not covered. Uber drivers are currently classified as independent contractors and exempt from requiring Workers Compensation insurance.	Covered in travelling within the course of employment (except travelling to and from work)	
Income protection/ Personal Accident & Injury	May not be aware of the need to take out insurance if heavily reliant on ridesharing income		

b) Pricing the risk of ridesharing

Insurance premiums should accurately reflect the usage of a private vehicle for ridesharing purposes and cover any additional risks that come about as a result using a private vehicle for ridesharing. The ACT Government Taxi Innovation Industry Review Discussion Paper correctly notes that: *'...insurance premiums vary significantly depending on the type of public-passenger vehicle (and other factors, such as insurance claim history). The insurance costs for vehicles used for rideshare purposes are also expected to vary from those applied to private vehicles.'* (page 30).

MOTOR INSURANCE (CONTINUED)

When insurers have insufficient data to price risk, there is a tendency to price the risk more conservatively. That is, insurers will use 'a worst case scenario' to assess the risk, potentially resulting in a higher premium than if information is available to accurately assess and price the risk. In the current market, insurance pricing is likely to take the form of two scenarios:

1. Rideshare vehicle is insured under a **private policy** – the higher risk of the rideshare vehicle is subsidised by other drivers who use their vehicle exclusively for private use.
2. Rideshare vehicle is insured under a **commercial policy** – the ride share vehicle pays a premium that is higher than the commensurate risk associated with ridesharing activity.

Regulatory settings that confirm the legality of these services, as well as appropriate categorisation and classification of vehicle usage for insurance purposes will enable the development of appropriate insurance solutions. Until this occurs participants in the shared economy may unintentionally subject themselves to substantial financial risk.

c) IAG's Current Position

IAG has attempted to respond to the rising popularity of transport network companies such as Uber by developing an approach that will ensure that our customers are protected until greater regulatory certainty is available which allows a more tailored response.

Since the emergence and rapid growth of Uber, IAG has been faced with questions from Uber drivers using their private vehicle about the degree to which our Comprehensive Motor policy provides coverage.

IAG's priority is to protect its customers. We believe drivers have the right to insurance and safe transport options. The growing uptake of shared economy services like Uber has the potential to leave a large number of drivers exposed because they are unaware they are uninsured. That is why in NSW IAG has made a discretionary decision to insure customers who occasionally use their vehicle for Uber. This is a somewhat unique position in the market at the moment. Uber drivers are excluded from most Australian insurance policies due to ambiguity about the legality of the service.

NRMA Comprehensive Motor Insurance

1. NRMA offers car insurance for individuals who drive their own cars for Uber occasionally, not on a full-time capacity.
2. This cover is different to a commercial taxi arrangement where there are multiple drivers and the car is generally on the road 24/7.
3. Standard CTP policies provide cover for any personal injury.

The cover offered by IAG is an interim measure to limit the exposure of IAG's customers until governments are able to provide greater certainty about the legality of, and the regulations that apply to non-traditional transport providers.

d) Potential insurance solutions

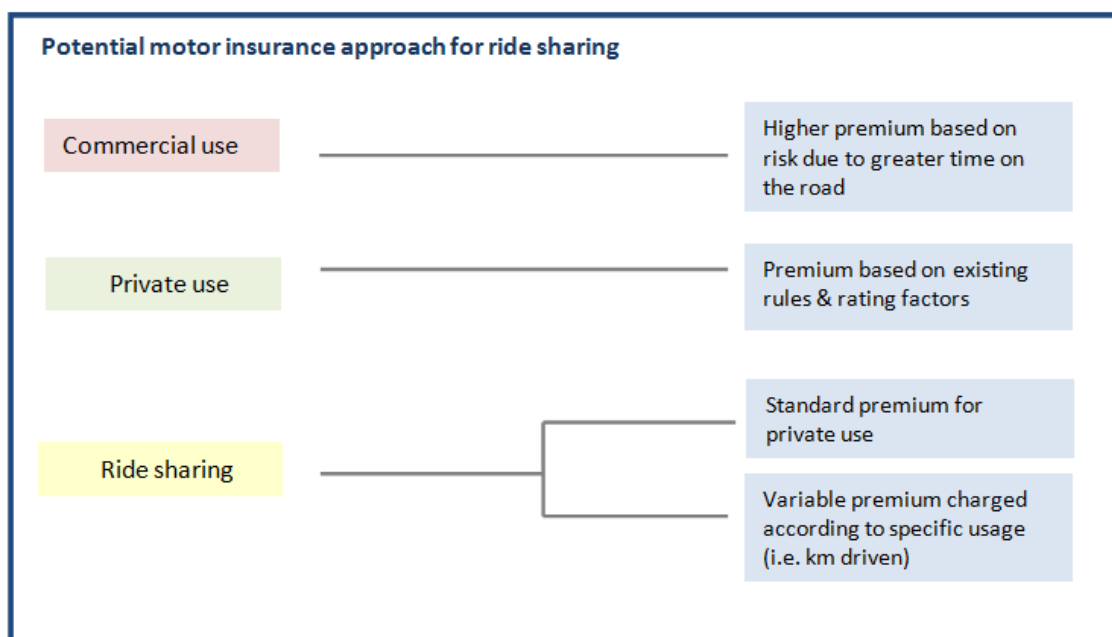
A clear, consistent regulatory framework nationally will allow insurers to customise business models to the changing needs of today. The current situation makes it difficult for insurers to make informed decisions about the appropriateness of providing cover to ridesharing participants. While there are tailored insurance solutions available overseas (see <https://www.metromile.com/uber/>, <https://www.geico.com/getaquote/ridesharing/>), a more certain regulatory environment is required in Australia to encourage investment in, and development of innovative products for this market.

MOTOR INSURANCE (CONTINUED)

In Australia, Uber has an estimated 9,000 drivers and has grown at 700% since January 2014. As the popularity and availability of shared service models is likely to continue to grow, IAG is exploring alternative insurance options and reviewing the appropriateness of our existing business models for these schemes.

As outlined above, the activity of rideshare drivers is a combination of private and commercial use of the vehicle. An insurance solution should be designed to ensure that the individual's asset is covered when they are using it for personal purposes, and when they are using it in the sharing economy.

The average typical UberX partner in Sydney drives around 20 hours a week and takes home \$2,500 a month². Given the varying nature of how people use their asset in the sharing economy, insurance should cater for an individual's circumstances while ensuring that the costs associated with additional risks of ridesharing are not borne by private vehicle users.



Alternatively, an insurance solution could be developed for the network transport provider rather than the individual driver. For example, insurance schemes exist for state run taxi organisations that have been designed to meet the common needs and interests of taxi cab owners and operators.

IAG is open to working collaboratively with government and road transport networks to develop appropriate insurance solutions for ridesharing activities. Sharing of data by transport network companies will assist the insurance industry to accurately assess and price risk for suitable insurance policies.

² Katie, 'Uber's Letter to the Transport Ministers of Australia' *Uber Blog*, 6 November 2014, www.blog.uber.com/Transport-Minister-Letter

COMPULSORY THIRD PARTY INSURANCE

With the recent and rapid evolution of ridesharing, the current regulatory framework for Compulsory Third Party (CTP) insurance for ridesharing vehicles needs to evolve to ensure legislation responds to consumer needs and behaviours, and enables the appropriate collection of data to accurately rate and price these risks.

The NSW CTP scheme provides for the classification of vehicles by their type and usage (passenger, hire car, bus, primary producer) and also provide for risk factors such as vehicle and driver age to be included in the price paid by consumers and businesses. These factors vary across geography and demographic risk factors to determine a final CTP premium price paid by the vehicle owner.

The main question raised by ridesharing with respect to CTP is how to best determine and price the risk and whether there is need to create a separate 'rating factor' or vehicle class to do this. As ridesharing is a relatively new activity, there is limited current data available in comparison to other vehicle types and uses.

It is possible that drivers who occasionally use their personal vehicle for ridesharing, and who are not undertaking this as a full-time activity, are exposed to only limited additional risk outside of what is already captured in the current Class 1 structure. Interestingly, in NSW, car-sharing vehicles are included in Class 1 (or equivalent) for the purposes of risk rating.

Finally, it appears that there is a degree of uncertainty regarding whether the use of a vehicle for 'business use' reflects an additional risk. A question is asked during the purchase process about whether the vehicle is used for business purposes. This question is asked for the purpose of determining whether or not the policy holder can claim an Input Tax Credit (ITC) on the policy, and *not* for the purpose of identifying a risk factor.

This distinction between 'business' and 'private' use is not well understood and is an issue that the government and ridesharing drivers will need to consider for tax purposes. Simply put, the use of a vehicle in a commercial capacity alone does not determine its class.

In addressing these concerns, IAG advocates for a simple solution for our customers who choose to use ridesharing either as a passenger or a driver to ensure they are properly covered for personal injury and for injuries they may cause to others.

IAG submits two options as possible solutions to positioning ridesharing in the NSW CTP regulatory scheme:

1. Classifying ridesharing vehicles as Class 1 vehicles
2. Creation of a "ridesharing" class of vehicles.

Option 1. Classification of ridesharing vehicles as Class 1 vehicles (or equivalent class)

This option would take advantage of the existing scheme where ridesharing vehicles (that are not licensed taxi or hire cars) are classified as Class 1 vehicles and are not uniquely identified in the scheme as a separate class. However, as this approach would not separately distinguish ridesharing activity which would otherwise allow for the ability to collect data over the long term which can be used to determine what difference in risk, if any, ridesharing poses and adjust premiums accordingly.

IAG views Class 1 as the most appropriate class for ride sharing vehicles under this option, as it better reflects mixed-usage of ridesharing vehicles, as opposed to the intensive dedicated passenger-carrying use of taxis that is reflected in Class 7.

COMPULSORY THIRD PARTY INSURANCE (CONTINUED)

If a measure to collect data on ridesharing usage by individual driver and vehicle was introduced in parallel, this arrangement could continue and a review can be undertaken to consider if there needs to be a separate vehicle class. The data collected for these vehicles could be used over the long term to help determine the appropriate relativity for the risk and evaluate the necessity or lack thereof of a distinct ridesharing vehicle class. IAG would endorse a model which reviews the relativities after 12 to 24 months.

Option 2. Creation of a “ridesharing” vehicle class

The creation of a “ridesharing” vehicle class would ensure necessary data is obtained to identify the risk associated with ridesharing vehicles. We consider that this could operate for an initial 12 month period as a separate class, but with the same price points as *Class 1* and the relativities could be reevaluated after a sufficient amount of data has been collected over a period of time. The advantage of this option is that it provides a simple mechanism for the collection of data with respect to the ridesharing driver over the long term and if these drivers are found to be a lower or higher risk than *Class 1*, there is opportunity and mechanism to enable price to follow the risk.

SAFETY

a) Consumer protection

Discussion point 5

Should ridesharing services be regulated? If so, how? Is there any need to distinguish them from other booked services?

The taskforce seeks comment as to how the regulatory framework could be simplified so that point to point transport providers have more flexibility about how they provide services. Should there be fewer restrictions as to how they operate?

i) Confirmation of legal status

The legal status of ridesharing enterprises such as Uber has attracted significant public attention. IAG has faced strong criticism from segments of the community for providing insurance for 'illegal' activity. While ridesharing is declared illegal in NSW, the legality of ridesharing is currently under review together with a number of other State and Territory Governments. The issue continues to be ambiguous because of contradictory statements by political leaders and decisions by the ATO (which has begun to actively collect GST on ridesharing services).

Until the legitimacy of ridesharing is satisfactorily resolved, IAG has made a decision to offer protection to our customers as an interim measure. IAG's position will be reviewed once clear regulatory guidance is available to inform business decisions.

IAG's current position is based on the needs of our customers. While regulation has not kept pace with technological developments, customers may unknowingly be exposing themselves to significant financial risk. Suggestions have been made that insurance claims will not be paid due to illegal activity. Under IAG's Product Disclosure Statement and Section 54 of the Insurance Contracts Act 1984 (Cth), unless an illegal act can be proved to have caused the incident for which a claim is lodged, a claim cannot be declined.

ii) National co-ordination & harmonisation

A number of State Governments are in the process of reviewing their road transport legislation. IAG supports harmonisation across Australian jurisdictions of any regulation as far as is practicable and appropriate. Particularly in the area of road safety, Australian drivers regularly drive interstate and should be able to rely on a level of consistency between the regulatory frameworks of each jurisdiction. In addition, strategies such as adopting vehicle design standards in the mould of the European Statement of Principles for Driver Interactions require national support to be effective.

iii) Self-regulation

The new platforms tend to self impose standards and self-regulation measures. Uber for example has voluntarily developed a Code of Conduct. Many road transport networks incorporate reputational mechanisms (eg. rating systems), user profiles, and various safety and security checks. The reputational rating systems that govern ridesharing models encourage safer driving and performance on the road. Social facilitation means that people are likely to drive more carefully and cautiously when being watched or monitored by others.

Regulation needs to be progressive and forward thinking to keep pace with the rapid change that characterises today's society. The general movement away from anonymous transactions and the increased transparency of new business models makes traditional regulatory tools such as disclosure largely irrelevant. Regulation should utilise the principles of behavioural economics to support and reinforce commercial incentives to self-regulate and improve service standards.

SAFETY (CONTINUED)

iv) Regulation in the public interest

As consumers are increasingly utilising ridesharing services, legislation needs to evolve to keep pace with consumer behaviour. Ridesharing has the potential to satisfy consumer demands while at the same time maximizing the economic value of underutilised existing assets which can greatly improve the overall efficiency of the economy. Rideshare services take advantage of two underutilised resources – idle cars and people in need of work – and match them to the demand of people who need transport. Early research suggests ridesharing may have broader social benefits such as reducing incidents of drink-driving and alcohol-related road accidents³. However there must be appropriate boundaries and price signals relative to the risk on the road – as for other commercial operators such as taxis, hire vehicles and buses.

v) Collection of data

The UN Global Plan for the Decade of Action for Road Safety 2011–2020 recommends establishing and supporting national and local data systems to measure and monitor road traffic deaths, injuries and crashes. In order to monitor the effectiveness of strategies to reduce injuries and accidents it is essential to develop a national database on injuries resulting from road accidents. Access to this data by the insurance industry would also facilitate the development of tailored private insurance products and enable fair and equitable pricing of ridesharing activity.

b) Road safety

Discussion point 7

The taskforce seeks comment on whether the Government's current safety standards for public passenger drivers are reasonable.

Also, how could the processes for enforcing these standards be improved? Are there alternatives to the current system that could work more efficiently and effectively?

Discussion Point 9

The taskforce invites comment on whether the current safety and security requirements for taxis are appropriate and whether there are alternative models for how safety outcomes can be achieved.

Discussion Point 10

The taskforce is interested in views on appropriate safety standards for point to point transport vehicles and how these standards may best be achieved.

For example, are there any requirements beyond roadworthiness you think are necessary?

IAG has a long history of advocating for road safety and it is at the very core of our business. A road safety culture, implemented at all levels of our society will help keep drivers safe, reduce collisions, injuries and damage to vehicles. This can in turn lead to a reduction of claims and frequency which is ultimately in the best interest of the community, our customers and our business. This will also help keep insurance affordable for the long term.

Vehicles used for the paid transportation of the public should be held to a higher standard. There is a need for regulation of minimum standards to protect consumers. Driver behaviour and vehicle design as outlined below should be considered in the development of minimum safety standards. This should as far as practicable, take the form of self-regulation or principle based regulation.

³ Greenwood & Wattle (2015) *Show Me The Way To Go Home: An Empirical Investigation of Ride Sharing and Alcohol Related Motor Vehicle Homicide* Temple University

SAFETY (CONTINUED)

i) Safe Vehicles

All vehicles used to deliver point-to-point transportation should be held to a higher standard of safety requirements due to the unique characteristics of the vehicle use, and the additional responsibility of carrying passengers for monetary gain.

Consumers should be able to expect that vehicles that transport the public meet satisfactory safety standards. Taxis and rideshare vehicles should aspire towards a 5 Star ANCAP rating. Taxi fleets have already made substantial progress towards this goal. Price signals could be used to encourage purchasing of safer vehicles, for example discounts on vehicle registration for 5-Star rated ANCAP vehicles. The size of vehicles should also be considered, as the physical mass of a vehicle can have almost as much impact on safety as its ANCAP rating in the event of an accident. Medium vehicles should be preferred, with a minimum of 1200kgs. This would also incidentally improve customer comfort and better accommodate some individuals with impaired mobility.

The nature of taxis and ridesharing means that they are subject to greater mileage and wear and tear than vehicles used for exclusively personal use. More time spent on the road means that the standard assumptions about the 'age' of a vehicle do not apply. For example, a Ford Falcon purchased three years ago for use as a taxi, could actually exhibit the same wear and tear as an identical vehicle twice its 'age'. This means that standard deterioration of the vehicle and some of its safety apparatuses are accelerated. For example, brake pads and tyre treads will wear down faster, increasing stopping distance and therefore increasing the risk of accidents. Risks could be minimized by the introduction of guidelines for the maximum age of passenger vehicles and frequency of servicing required.

A greater reliance on technology by drivers (such as Smartphone and GPS) also necessitates safety measures to minimize the risks of driver distraction. Regulation of passenger vehicles should include prescribing the location and use of portable devices in vehicles.

ii) Safer drivers

Taxis and ridesharing drivers are increasingly dependent on technology such as smart phones and GPS to locate passengers, communicate with them, and take them to their destination. While these innovations can improve service for customers and enable innovative new business models, they can also pose serious risks relating to driver distraction if not properly used.

Driving is a complex task that requires considerable concentration and focus if the risk of a collision is to be minimised. Drivers put themselves at increased risk of a collision when they attempt to combine driving with another task. Anything external to a driver that may impair their ability to focus their attention on the primary driving task, and consequently affect their driving performance, can be considered a driver distraction.

As the National Road Safety Strategy 2011-2024⁴ notes, the sources of driver distraction have 'increased substantially' in recent years.

"Modern vehicles can include on-board DVD, satellite navigation, complex sound systems, climate controls, and audible and visual signals for an array of vehicle operations which compete for driver attention. Although it is very difficult to quantify the effect of all of these and other sources of

⁴ p 84. The National Road Safety Strategy 2011-2020 released by the Australian Transport Council on 20 May 2011 outlines broad directions for the future of Australian road safety in the four key areas - Safe Roads, Safe Speeds, Safe Vehicles and Safe People. The Strategy addressed the impact of driver distraction on road safety as part of 'Safe People'.

SAFETY (CONTINUED)

distraction on serious road casualties, they are recognised as a major and potentially growing problem area.”

IAG has conducted numerous road safety tests and studies into driver distraction.

IAG research findings

- Mobile phone use significantly impairs driving ability
- Visual GPS units can impair driving ability as they require the driver to divert his/her eyes from the road.
- Voice commands are the safest means by which drivers can be directed by GPS technology
- The least safe position for a portable GPS unit is in the centre of the windscreen under the rear-vision mirror or directly in front of the driver, as these locations block the field of view creating large areas invisible for the driver.
- Activities that encourage a driver to take their eyes off the road are a particularly dangerous source of distraction.

(Refer to IAG's submission to the NSW Staysafe joint standing committee on Road Safety <http://www.nrma.com.au/sites/default/files/NRMA-Documents/Stay-Safe-Driver-Distraction-Submission.pdf>)

Global Positioning Systems (GPS)

Given that both taxi and rideshare services are increasingly dependent on GPS mapping, guidelines should be developed to minimise the driver distraction associated with the use of GPS technology. Based on IAG's research, guidelines should encourage:

- a) The use of voice commands (as opposed to visual maps) to reduce the need for drivers to divert their eyes from the road.
- b) Deactivation of screens and restriction of all modes and forms of entering data into a GPS unit while the vehicle is moving
- c) Positioning of the device in a location that minimizes obstruction of the driver's view - devices should be mounted in the right front lower corner of the windscreen.

Smart phones and other devices

Smart phone booking apps are integral to the ridesharing model. Most rideshare apps stipulate a brief time limit within which a fare can be accepted. The demand for instant attention when notified of a potential fare is concerning. Drivers need to react almost instantly to the smart phone to gain the customer (and the associated fare) making it difficult for the driver to take into account road conditions or safety before responding.

IAG considers banning an inventory of activities to be undesirable. In our view the best way to encourage safe driving behaviour is through education and vehicle design rather than trying to legislate for common sense. However, in light of the pace of recent technological developments, any regulation of technology needs to be 'device neutral'.

Ideally, businesses should be encouraged to compete on the basis of their safety standards as outlined in relevant guidelines. Transport network companies in particular should be encouraged to redesign its technology to prevent drivers from interacting with the app while in motion. Public awareness campaigns can educate passengers on what they should expect from a safe driver and persuade transport providers to compete to meet these expectations. Public awareness campaigns to educate drivers and passengers about the realities of distracted driving may also encourage developers to create app based booking systems that minimise driver distraction.

SAFETY (CONTINUED)

SUMMARY OF RECOMMENDATIONS

1. Confirmation of the legal status in NSW is required to encourage insurers to develop suitable products and educate customers on risk management solutions for ridesharing.
2. IAG recommends nationally consistent regulation of ridesharing that prioritises the public interest and reinforces effective self-regulatory mechanisms.
3. IAG supports a CTP regulatory framework which makes it easy for ridesharing drivers and consumers to understand their policy cover and which does not create a disincentive to self-identify as a ridesharing driver or to undertake these activities.
4. The collection and sharing of data nationally is recommended to improve risk rating for both private and publicly underwritten insurance schemes, as well as aid the development of effective road strategies .
5. Development of minimum safety standards for all transport vehicles is recommended including:
 - a. Guidelines and incentives to encourage safer vehicle purchasing and appropriate vehicle inspections and servicing
 - b. Device neutral guidelines on technology use while driving to minimize driver distraction

25 September 2015

Secretariat
Regulation of Point to Point Transport
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Email: pointtopoint@transport.nsw.gov.au

Dear Secretariat

**POINT TO POINT TRANSPORT TASKFORCE
DISCUSSION PAPER**

The Insurance Council of Australia (ICA) is the industry association for the general insurance industry. ICA members provide a range of insurance products in New South Wales, including motor vehicle property insurance and compulsory third party (CTP) personal injury coverage.

The ICA appreciated the opportunity to recently meet the Point to Point Transport Taskforce (Taskforce) Chair, Professor Sturgess, as the Discussion Paper was being developed.

The ICA is pleased to provide this brief submission addressing insurance arrangements for point to point transport providers (discussion point 11), with particular reference to ridesharing providers.

A number of reports have recommended reviews of current regulatory frameworks to ensure Australian competition laws do not stifle competition. These issues have been canvassed in various reviews of regulatory frameworks such as the Financial System Inquiry and the Competition Policy Review.

The ICA has a keen interest in competition and innovation, with appropriate checks and balances. It supports the principle of competitive neutrality. Like goods and services should be subject to the same consumer and safety regulations and requirements.

In relation to the entry to the marketplace of new point to point transport services, it is the ICA's position that it is a matter for State and Territory governments to determine:

- the legality of new services outside of regulated taxi or hire car services;
- the characterisation of such services for the purposes of regulation; and
- the specific regulatory requirements that should apply for nominated categories of point to point transport services.

For example, whether ridesharing services are to be characterised as a taxi or hire car service (or something else, such as a booked service) is for governments to determine in consultation with interested parties.

General insurance can offer protection for those involved in new business models that offer services via "shared economy" platforms. However, personal insurance policies for home or motor insurance typically do not cover activities of a commercial nature. If a rideshare driver sustained damage to his or her vehicle in an accident, or caused damage to other property while providing a rideshare service, a personal motor insurance policy may not cover the cost of this damage.

However, as regulatory certainty for new services increases, it is likely that competitive market forces will respond to the commercial insurance needs of rideshare drivers. The Discussion Paper notes, for example, media reports that some Australian insurers are starting to explore how their products could cover rideshare providers.

A consumer using a personal vehicle for commercial purposes should therefore clarify with their insurer whether they are covered for motor vehicle property damage (comprehensive or third party property) sustained during the commercial activity.

The Discussion Paper has specifically asked whether it is necessary to specify a minimum level of coverage for third party property insurance. The ICA supports a minimum level of such cover because of the higher risk of motor accidents of point to point transport services. This ensures that not-at-fault motorists can successfully claim compensation for property damage, and it can prevent situations where passenger transport service providers could sustain large personal losses if directly sued for compensation for property damage caused.

In relation to compulsory third party (CTP) insurance, scheme funding is the key issue. Premiums must be sufficient to meet the cost of claims. The ICA's recent submission to the ACT's 2015 Taxi Industry Innovation Review provided an alternative suggestion for CTP vehicle classification that the Taskforce may also wish to consider, depending on regulatory frameworks.

We suggested ridesharing vehicles be separately classified, so that at registration, vehicle owners who intend to provide ridesharing services are required to register their vehicle on this basis and pay the relevant CTP premium for the ridesharing vehicle class. The ICA further suggested that ridesharing operators should require proof of this registration from their drivers.

The reasons for this proposal included:

- different vehicle classes are subject to different CTP premiums, depending on the risk relevant to that class;
- taxis have their own vehicle class, as they represent a substantially higher risk for CTP insurance claims, due to the increased time spent on the road, and the carriage of third party passengers. This risk is reflected in the premium charged;
- vehicles used for ridesharing services may attract a higher claims frequency and higher claims cost than vehicles that are only used privately.

Critically, separate classification would ensure that providers of rideshare services pay a CTP premium appropriate for the related risk, to ensure the class is fully funded. If claims data over a relevant period of time demonstrates that ridesharing services do attract a higher claims frequency, this would avoid the potential cross-subsidisation for providers of rideshare services by other classes of lower risk vehicles in the scheme (such as private use only vehicles).

If you would like to discuss this submission further, please contact Vicki Mullen, ICA's General Manager, Consumer Relations and Market Development on 02 9253 5120 or vmullen@insurancecouncil.com.au.

Yours sincerely



Robert Whelan
Executive Director and CEO

Submission on Point to Point Transport Taskforce Discussion Paper

September 2015

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Contents

1	Introduction	1
2	Context	1
3	Safety and security	7
4	Consumer protection	11
5	Quality of services	14
6	Regulation of supply of services	14
7	Compliance and enforcement	16

1 Introduction

Thank you for the opportunity to comment on the Point to Point Transport Taskforce's Discussion Paper. We support a thorough review of the regulatory framework for point to point transport.

IPART has recommended taxi fares to the Government each year since 2001 and has recommended the number of new annual Sydney taxi licences to be released each year since 2012. We also undertook a review of the taxi and hire car industries in 1999.¹ Through our work, particularly recently, we have become aware of the rapid pace of change in the point to point transport industry, much of which has been to the benefit of consumers and has delivered on the aims of regulatory changes made over the last two decades.

However, the pace of change in society, the point to point industry and in available technology, has outstripped a regulatory framework that was first established when taxi cabs were pulled by horses. We consider it timely to review the regulatory framework from a 'first principles' approach, considering the appropriate objectives for the regulation of point to point transport and then the best measures to achieve those objectives.

This submission sets out our views and recommendations on the issues and discussion points posed in the Discussion Paper, where we have the expertise, experience and information to respond.

2 Context

We concur with the Discussion Paper's assessment of the changes in society and technology that are driving the need for regulatory change in point to point transport. Over the period that we have been reviewing the number of new annual taxi licences to issue each year, we have observed the entry of commercial ride-sharing in Sydney and its impact on demand for taxis.² We were also told of the impact on demand for taxis by courtesy transport provided by licensed venues, particularly in areas outside Sydney.³

Some of the issues are not new, however. Successive governments in NSW and elsewhere have wrestled for many years with the problems created by regulating the supply of taxi licences. High taxi licence prices indicate an under-supply of taxis relative to demand and put a cost burden on those entering the industry, but incumbent owners of high value licences understandably do not want to see a drop in the value of their licences.

¹ IPART, *Review of the Taxi Cab and Hire Car Industries – Final Report*, November 1999.

² IPART, *Sydney taxi fares to apply and new licences to be released from July 2015 – Final Report*, February 2015, pp 2-3.

³ IPART, *Review of taxi fares outside Sydney to apply from July 2015 – Final Report*, June 2015, pp 59-60.

Overly prescriptive regulation has also burdened the taxi industry and to a lesser extent the hire car industry with high compliance costs (ultimately paid for by consumers through higher fares) and stifled innovation. Excessive regulation has also served as a barrier to entry to the point to point transport industry and thereby restricted competition, which can work to the advantage of incumbents, although not consumers. In our view, a 'level playing field' of regulation should not involve applying existing regulations to new entrants such as commercial ridesharing. Rather, a level playing field should mean a simplified regulatory framework that applies to all participants, lowers barriers to entry and allows the market to better match supply of and demand for point to point transport services including taxis, hire cars and ridesharing.

The Licensing Framework developed as part of IPART's *Reforming Licensing in NSW Review* sets out a conceptual framework and guide to its application to assist in improving licence design and administration.⁴

Recommendation

- 1 That the taskforce apply the IPART Licensing Framework and Guide to assist in developing an optimal regulatory framework for point to point transport.

Discussion point 1: The taskforce seeks comment on what steps could be taken to make taxi drivers' incomes more sustainable.

Through our previous reviews,⁵ we have found that driver earnings are independent of taxi fares. Drivers' earnings consist of fare revenue less drivers' costs and the largest driver cost, the pay-in, is likely to move in the same direction as fare revenue, leaving the driver with the same level of earnings. Drivers' earnings are effectively negotiated between drivers and operators, and are determined by the supply of and demand for drivers.

The contractual relationship between bailee drivers and operators in Sydney is regulated by the NSW Industrial Relations Commission, which sets maximum pay-ins for each shift. However, in practice, market pay-in rates are below the maximum pay-in rates for all shifts. This means that the pay-in a driver actually makes to an operator is determined by agreement between the driver and operator.

⁴ PricewaterhouseCoopers, *A best practice approach to designing and reviewing licensing schemes*, May 2014 and PricewaterhouseCoopers, *A best practice approach to designing and reviewing licensing schemes – Guidance material*, May 2014.

⁵ See for example IPART, *Review of maximum taxi fares and review of annual Sydney taxi licences from July 2014 – Final Report*, February 2014, pp 21-24.

The relative bargaining position of drivers and operators in the negotiation is determined by the demand for drivers, relative to the supply of drivers. If there are not many taxis, and a lot of drivers who want to drive taxis, operators are more likely to charge a higher pay-in, and so drivers would take home less of the total fare revenue. Keeping the supply of taxis (and therefore the demand for drivers) fixed, together with a growing number of drivers, suppresses driver earnings.

On the other hand, increasing the number of taxis – or close substitutes such as hire cars or commercial rideshare – and therefore the demand for drivers would tend to improve the bargaining position of drivers. Operators might have to reduce their pay-ins in order to get drivers for their taxis, as drivers are better able to ‘shop around’ for the best pay-in deal. This would mean that the take-home earnings for drivers would be higher.

We consider that an updated and streamlined regulatory framework that removes barriers to entry to the point to point transport market is likely to increase the demand for drivers and improve their incomes.

Discussion point 2: Given the inconsistent application of network authorisation requirements across NSW, the taskforce seeks comment on whether the requirement for a network to be authorised is necessary at all, let alone meet complex application requirements before being able to operate, particularly in regional areas.

The need for, and the nature of, authorisation for taxi networks is dependent on the legislative responsibilities of those networks, which is one of the issues being examined by the Taskforce.

IPART supports removing the requirement for authorisation in regional areas (ie, areas covered by the country fare schedule). Under the current regulatory framework, there would appear to be few identifiable benefits of taxi network authorisation and mandatory operator affiliation in regional areas.

Recommendation

- 2 That the regulatory framework for point to point transport should not require network authorisation in regional areas.

In Sydney and other metropolitan transport districts (ie, the areas covered by the current urban fare schedule), the current situation is more complex, as over time networks have assumed a co-regulatory compliance and enforcement role where potentially authorisation and the conditions associated with it serve safety, security and quality outcomes. However, the highly prescriptive and complex application requirements are unlikely to have produced any benefits for consumers, have added costs and have served as a barrier to entry of new networks. If authorisation is to be retained in metropolitan transport districts

under the regulatory framework, the conditions of authorisation should relate to operational requirements rather than to application requirements.

Recommendation

- 3 If networks continue to be accountable for safety and security arrangements in taxis, they should continue to require authorisation. However, the **application** requirements should be minimal and any conditions of authorisation should relate to **operating** requirements.

A more fundamental review of the regulatory framework may obviate the need for network authorisation entirely. Taxi network operations and responsibilities are perhaps a good example of a situation where regulation may have been necessary when effective competition was absent, but with the emergence of competition, there is less need for regulation, including authorisation of networks and mandatory affiliation of operators with networks.

A simpler, outcome-focused regime with clear accountabilities could replace network authorisation and mandatory operator affiliation. In its recent Green Paper on on-demand transport,⁶ the WA Government proposes a system of accountability that focuses on the dispatcher of a service (ie, the booking service), the licensee, the vehicle owner and the driver. The NSW Point to Point Transport Taskforce Discussion Paper similarly on page 17 discusses the distinction between booked and non-booked point to point transport services. We note that, on its commencement, Part 5 of the *Passenger Transport Act 2014* will introduce regulatory changes to network services by separating the functions of taxi networks and booking (or dispatching) services in NSW.⁷

The separation of functions should enhance competition in the market for network services as well as booking services, and consequently reduce network fees. However, the uptake of booking services provided by entities other than taxi networks, and any associated benefits such as cost savings, may be limited if operators are not able to restructure their network affiliation to only include network services. That is, in practice operators may feel obliged to retain (and pay for) the booking services offered by the network and use a competitor's booking service in addition to, rather than instead of, the network's booking service.

Removing mandatory network affiliation would be an alternative way of encouraging greater competition in network services. Competition will drive innovation and cost efficiencies. We note that it is no longer mandatory for taxi operators in Victoria to be affiliated with a network, and instead taxi operators are responsible for ensuring that security and safety outcomes are met – which can be done through a network or other means. In such a framework, where the

⁶ Government of Western Australia, *On-demand Transport: A discussion paper for future innovation*, 2015, p 36.

⁷ While the *Passenger Transport Act 2014* received assent in September 2014, not all parts have commenced.

responsibility lies with the operator, network authorisation would not be required. However, the regulator may require additional powers to monitor and enforce safety and security arrangements made by the operator, so consumers can have confidence in rank and hail services.

Recommendation

- 4 The taskforce should develop from first principles a regulatory framework for point to point transport which:
 - is outcome-focused and risk-based
 - regulates similar services uniformly and differentiates in regulation only where there are significant differences in operation risks (eg, by distinguishing between booked and unbooked services)
 - assigns clear accountabilities with tools to monitor and enforce them where necessary (eg, authorisation and accreditation)
 - which addresses safety, security and consumer protection
 - promotes competition
 - does not create barriers to entry.

Recommendation

- 5 That the regulatory framework for point to point transport should not require mandatory network affiliation for taxi operators.

Discussion point 3: The taskforce is interested in views around alternatives to the universal service obligation on the taxi industry which could improve access to services for customers.

Could alternative approaches meet the objectives of universal service in a more effective way?

In our view, the development of a simpler and more consistent regulatory framework should improve the supply, extent and flexibility of point to point transport services, improving coverage and affordability.

More services would be included in the definition of a booked service (ie, an 'e-hail' using a smartphone for immediate pick-up from a street location is a booked service), and more flexible service provision (eg, by part-time commercial ride-share drivers) would provide a better match of supply and demand. However, this could also serve to shrink the market for traditional rank and hail business and may exacerbate access problems for some: elderly, disabled or low income people, who are also less likely to have access to smartphones for the full range of booking options. Even under current regulatory arrangements, some of this demand is met by community transport, which we would expect to continue to play a role in providing transport to this group.

Recommendation

- 6 That the universal service obligation should be removed and the market should be able to determine hours and areas of operation, and match supply to demand. However, the availability of point to point transport services should be monitored to assess whether all segments of the market are being adequately served. We note that Government-subsidised community transport services would continue to be required to address the needs of the elderly, disabled or low income people.

Discussion point 4: The taskforce invites comment on current government initiatives to encourage the availability of wheelchair-accessible vehicles.

How could these be more effective?

Initiatives such as the centralised booking service, lift fee, and lower cost licences appear to provide a level of service for wheelchair-using passengers in NSW that compares well to services available in other states, although we note that WAT network KPIs for Sydney, Newcastle and Wollongong still do not deliver at the same level as standard taxi services,⁸ as required by Commonwealth Disability Standards.

However, under a revised regulatory framework, the taskforce will have to consider whether these initiatives will continue to suffice, for the same reasons as outlined in the response to Discussion point 3: greater availability and flexibility of booked conventional services will provide better services for many, but may exacerbate the disadvantage of some.

Discussion point 5: Should ridesharing services be regulated? If so, how? Is there any need to distinguish them from other booked services?

The taskforce seeks comment as to how the regulatory framework could be simplified so that point to point transport providers have more flexibility about how they provide services. Should there be fewer restrictions as to how they operate?

We consider that there should be fewer distinctions between modes of point to point transport, allowing for competition that can achieve better outcomes for passengers than regulation in many cases. We consider that the objectives of a regulatory framework should be:

- ▼ All competitors should be subject to appropriate regulation for safety of passengers and drivers and for the protection of consumers. We consider that regulation should cover areas such as driver authorisation, vehicle operation, records of journeys, and accountability for services.

⁸ Data available from Transport for NSW on request. The most recent data IPART reported on is contained in IPART, *Review of maximum taxi fares and review of annual Sydney taxi licences from July 2014 – Final Report*, February 2014, Appendix E.

- ▼ Regulatory requirements should generally be the same across modes and across areas – with exceptions for significant differences in risk to passenger or driver safety or consumer protection. The distinction between booked and non-booked services seems to be one such sensible distinction.

Recommendation

- 7 That all point to point transport, including commercial ridesharing, should be subject to the regulatory framework as set out in Recommendation 4.

While a level regulatory playing field is an appropriate objective, it should not be achieved by increasing the regulatory burden on new entrants or existing competitors. We consider that the taxi industry (and to a lesser extent the hire car industry) is burdened with higher costs compared to other modes of transport due to inappropriate or outdated regulatory obligations.

Some existing regulations are anti-competitive and should be removed. For example, the *Passenger Transport Regulation 2007* was recently amended to prohibit country hire cars from taking bookings less than 30 minutes from the pick-up time.⁹ This amendment acts to limit competition with taxis for no identified benefit to customers. Regulations of this nature are anti-competitive and should be removed, notwithstanding that this amendment was just introduced.

Reform of regulatory requirements could reduce costs and enhance efficiencies in the provision of point to point transport services, without compromising safety or quality of services. For example:

- ▼ Restrictions, whether legislative or price-based, on the supply of licences should be removed.
- ▼ Overly-prescriptive regulations should be removed when an outcome-based requirement could encourage innovation and achieve the same result flexibly and at lower cost.

These issues are dealt with in more detail under specific discussion points below.

3 Safety and security

We agree that safety and security of customers and drivers is a key consideration and focus for regulatory requirements on point to point transport.

⁹ Transport for NSW media release, *New hire car regulations to apply in country NSW*, 26 August 2015, accessed at <http://www.transport.nsw.gov.au/media-releases/new-hire-car-regulations-apply-country-nsw>

Discussion point 6: The above rules [regarding driver licensing] are applied differently to different types of point to point transport drivers. How could these requirements be better applied?

If it is considered appropriate for professional drivers to apply for an additional demerit point, then all professional drivers including commercial rideshare drivers should be permitted to do so, based on the current threshold definitions of 'primary work' and number of hours per week spent driving.

We note, per footnote 44 on page 22 of the Discussion Paper, that taxi and hire car drivers are permitted to use bus lanes, and to stop in clearways and some designated No Stopping zones, but that the taskforce does not propose to consider these provisions as part of the review. Nevertheless, we consider that these provisions do relate to the regulatory framework for point to point transport and should be applied either to all point to point transport or to none (or to a subset such as providers of non-booked services only).

Similarly, the lower blood alcohol content limit for bus, taxi and hire car drivers should also apply to all point to point drivers, as well as the exemptions from requirements around handling devices such as GPS units, dispatch units and mobile phones.

Recommendation

- 8 That the rules regarding demerit points, blood alcohol content, use of devices in vehicles and use of bus lanes, clearways and No Stopping zones should be applied consistently to point to point drivers based on risk.

Discussion point 7: The taskforce seeks comment on whether the Government's current safety standards for public passenger drivers are reasonable.

Also, how could the processes for enforcing these standards be improved? Are there alternatives to the current system that could work more efficiently and effectively?

As part of our *Reforming Licensing in NSW* Review, IPART identified the Taxi Driver Authority as a licence that was a 'Top 40' priority for reform, based on:

- ▼ duration (at three years, it is shorter than the optimal 5-year duration we identified)
- ▼ conditions not set using best practice
- ▼ licence not reviewed during previous five years
- ▼ fees not set on a cost-recovery basis, and

- ▼ the compliance burden being potentially excessive.¹⁰

Recommendations

- 9 That the current conditions of driver authorisation should be reviewed for their effectiveness at ensuring minimum standards of safety and security. Fees should be set on a cost-recovery basis and the appropriate duration of the licence considered. There should be a mechanism for permanently removing authorisation from people who are deemed unfit to be a professional driver.
- 10 That the requirement for driver authorisation should apply uniformly to all drivers of point to point transport.
- 11 That driver authorisation should not deal with matters of driver quality; additional standards and training requirements could be set by individual businesses as a business decision.

Our licensing review identified the compliance regime, which currently consists of blanket inspections, periodic reporting, targeted inspections and exceptions reporting, as potentially having scope to reduce burden and therefore costs, without reducing safety.

Recommendation

- 12 That the taskforce should use IPART's Licensing Framework to develop an optimal compliance regime for drivers involving targeted inspections rather than blanket inspections, and exceptions reporting rather than periodic reporting.

Discussion point 8: Are there ways that the [vehicle] registration regime could be streamlined for point to point transport providers?

We consider that the vehicle registration scheme should be applied uniformly to point to point transport vehicles, with inspection regimes based on risk and registration charges based on impact. Given that commercial rideshare involves the use of private vehicles potentially only used part-time, it may be necessary to consider guidelines for defining 'private use' to assist the RMS in determining whether a vehicle should be charged private or business rates for registration.

Recommendations

- 13 That the taskforce consider developing guidelines for defining 'private use' to assist RMS to determine whether a vehicle should be charged private or business rates for registration.
- 14 That existing registration requirements, such as the letter of permission to transfer registration described on page 27 of the Discussion Paper, be reviewed to assess whether they have a net benefit in terms of safety, and be removed if they do not.

¹⁰ IPART, *Reforming Licensing in NSW: review of licence rationale and design – Final Report*, September 2014, p 378.

Discussion point 9: The taskforce invites comment on whether the current safety and security requirements for taxis are appropriate and whether there are alternative models for how safety outcomes can be achieved.

We consider that the distinction between booked and non-booked services, as proposed by the Discussion Paper, is an appropriate one. We agree that additional safety and security arrangements (for both drivers and passengers) are likely to be required for non-booked journeys. We consider that these should be outcome-focused rather than prescriptive. The current requirements for taxi vehicle identification, communication equipment, and vehicle monitoring, through both in-vehicle security cameras and remote tracking, would appear to achieve safety and security objectives, but those objectives could potentially be achieved more cost-effectively if the requirements were less prescriptive.

Recommendation

15 That safety and security requirements for non-booked point to point transport should be outcome-based, and focus on vehicle and driver identification, communication equipment, and trip monitoring and tracking.

Discussion point 10: The taskforce is interested in views on appropriate safety standards for point to point transport vehicles and how these standards may best be achieved.

For example, are there any requirements beyond roadworthiness you think are necessary?

In terms of **vehicle** standards, we consider that safety standards should be uniform across providers, except for additional safety requirements for non-booked services. For vehicles providing **booked** services, roadworthiness as assessed by the vehicle registration process may be a sufficient standard, although additional compliance checks are likely to be required to ensure ongoing roadworthiness between registration inspections. Vehicles providing non-booked services will continue to require additional identification, communication and security features, which should be regulated for outcomes, as per Recommendation 15.

Recommendation

16 For all vehicles providing point to point transport, any vehicle safety requirements beyond roadworthiness, as assessed by the registration process, should be reviewed and clearly justified. For example, it is unclear how arbitrary vehicle age limits enhance the safety of point to point transport. However, vehicles providing non-booked services will also require additional identification and communication features. Regulation of these requirements should be outcome-based rather than prescriptive.

In terms of **non-vehicle related** determinants of passenger and driver safety and security, we consider that standards should be uniform across providers of

booked services, with somewhat different requirements for non-booked services (as set out in Recommendation 15). We consider that minimum uniform safety requirements for booked journeys might include identifying passengers as well as drivers, recording booking details, tracking journeys, providing facilities for cashless payment, and appropriate protection of data generated by these requirements.

Recommendation

- 17 All providers of booked point to point transport services should be required to adhere to outcome-based safety and security standards that include identifying drivers and passengers, recording booking details, tracking journeys, providing facilities for cashless payment, and appropriate protection of data generated by these requirements.

A key consideration for the taskforce is where the accountability for meeting these requirements should lie: with the booking service, the operator of the point to point transport service or the driver.

4 Consumer protection

Discussion point 11: The taskforce is interested in comment on insurance arrangements for point to point transport providers. How could they be improved?

There is no doubt that point to point transport providers need to have appropriate insurance coverage to protect passengers, drivers and other cars on the road.

In the current NSW regulatory framework, taxi and hire car operators are responsible for obtaining insurance to cover their vehicles and drivers, and are required to have third party property and workers' compensation insurance as well.¹¹ Rideshare drivers may be in breach of their personal insurance policy contracts when they carry passengers for payment.

For Compulsory Third Party (CTP or green slip) insurance, the Motor Accidents Authority (MAA) issues premium-determination guidelines to insurers. The guidelines assess risk relativity based on claims experience; both taxis and hire cars have higher risk relativities than 'motor cars', although taxis are much higher at 1151 for metro taxis (compared to the metro 'motor car' base premium of 100) than metro hire cars at 110.¹² (We note that the risk rating of metro taxis and metro hire cars will increase to 1188 and 121 respectively from February

¹¹ Roads and Maritime Services (RMS), *Taxi-cab Operator Accreditation Package*, August 2013, p 16 and 23; and RMS, *Private Hire Vehicle Operator Accreditation Package*, September 2009, p 10.

¹² MAA, *Schedule of premium relativities from 1 November 2014*, pp 3-4.

2016.)¹³ The MAA does not take the business or private use of a motor car into account when assessing risk relativity, although individual green slip providers may use it as a factor when setting premiums.

The Discussion Paper notes that rideshare drivers are potentially underpaying premium relative to the risk of the vehicle. The size of any underpayment would depend on whether the rideshare vehicles' risk profile was closer to that of taxis or hire cars.

If the regulatory framework for point to point transport changed to distinguish between booked and non-booked services, rather than using existing designations such as 'taxi', 'hire car' and so on, the MAA may have to review its categories for risk rating. We note that the most recently published Schedule of Premium Relativities discusses the MAA's analysis of and decision to continue to classify passenger vehicles used by car sharing operators as Class 1 (ie 'motor car').¹⁴

Whether a specific point to point transport vehicle was required to be insured as being used for business purposes could be linked to its registration status, as discussed at Recommendation 13. If ridesharing were included in the regulatory framework and required to have third party property coverage like taxis and hire cars, we would expect insurance providers to enter the market with appropriately priced products that explicitly cover ridesharing.

Discussion point 12: Could fare regulation be simplified for the benefit of customers?

Do you have any other suggestions about how information to customers could be improved?

Discussion point 13: The taskforce seeks comment as to whether there should be any changes to the way fares and meters are regulated, and whether new technologies offer new opportunities at a relatively low cost to industry.

Currently, maximum taxi fares are set by Transport for NSW. IPART has made recommendations to Transport for NSW on the level of maximum fares since 2001.

Hire car charges may be determined by Transport for NSW (*Passenger Transport Act 1990* s 60A and *Passenger Transport Act 2014* s125) but are not currently.

We consider that, where effective competition (and information to consumers) exist, fare regulation is not necessary. If a distinction is to be made between booked and non-booked services in the regulatory framework, we consider that there is already sufficient competition and information in the booked services

¹³ MAA, *Schedule of premium relativities from 1 February 2016*, p 4.

¹⁴ MAA, *Schedule of Premium Relativities – Effective 1 February 2016*, 5 August 2015.

market that these charges do not need to be regulated. However, service providers should be required to give customers information about the basis of calculating fares including any peak or 'surge' pricing, and an estimate of the fare, in advance of the hiring.

In the longer term, effective competition should also develop for non-booked services (rank and hail) if licence supply restrictions are lifted. As a transition measure, we recommend retaining maximum fare regulation, with a review of its necessity after five years. Discounting below the maximum would still be possible and, as more competition emerged, would be more likely than is currently the case.

For transitional regulated fares, we consider that the existing structure of flag fall, distance rate and waiting time is appropriate and reasonably well understood. Based on information provided to us during our fare reviews, customer confusion is more likely to arise over charges added legitimately but manually at the end of a journey: tolls, booking fee, airport access fee or return Harbour toll, for example. These concerns would potentially be met by clearer information on receipts, as is required by the Australian Consumer Law and the Australian Taxation Office.

Given that these requirements already exist, it is not clear why the NSW Taxi Council has asked the NSW Government to separately regulate receipts. (Discussion Paper, p 34) We consider that it would be more appropriate for NSW metering and fare regulations to be outcome-focused ie, require installation of a meter (or 'fare device' as the Victorian legislation defines it) that calculates fares and produces receipts that comply with relevant legislation, rather than specifying the meter hardware.

Recommendation

- 18 That the regulatory framework for **booked** point to point transport services should not regulate fares for these services. However, the regulations should require service providers to give customers information about the basis of calculating fares and an estimate of fares, in advance of the hiring.

Recommendation

- 19 That, once licence supply restrictions are lifted and the scope for effective competition is present, fares for **unbooked** point to point transport services need not be regulated. As a transition measure, maximum fares should continue to be regulated by an independent regulator. Fare regulation should be reviewed after five years.

Recommendation

- 20 That meters or 'fare devices' for point to point transport services should be required to calculate fares in accordance with regulated fares (where they exist) and issue receipts that comply with relevant legislation.

5 Quality of services

Discussion point 14: Should service quality be subject to regulation? Are there alternative ways to ensure service quality for point to point transport customers?

As a general principle, service quality should not be subject to regulation where a sufficiently competitive market exists. The detailed and prescriptive restrictions on hire car vehicles are a good example of unnecessary service quality regulation that has simply served to restrict competition.

As discussed above with respect to fares, the nature of the rank and hail market means that customers do not have full access to information about price, quality or service availability. There may be an argument for retaining some of the existing quality regulation about cleanliness, a smoke-free environment, air-conditioning etc.

Recommendation

- 21 That the regulatory framework for **booked** point to point transport services should not include service quality regulation.

Recommendation

- 22 That the regulatory framework for unbooked point to point transport services may include regulations for minimum quality standards as considered appropriate, including matters such as vehicle condition and comfort and driver conduct and behaviour (as well as passenger conduct and behaviour).

6 Regulation of supply of services

Discussion point 15: Should the government manage supply of taxi services?

If so, how should they be restricted?

Should there be different arrangements outside Sydney?

Discussion point 17: Should the Government manage the supply of hire car services? If so, on what basis?

We do not consider that there is any economic justification for the Government to manage supply of point to point services, whether taxis, hire cars or other, when a competitive market is able to meet demand.

Licensing arrangements over the years have served to restrict the number of taxi licences released and increase the value of those licences. Numerous reviews have failed to find any justification for supply restrictions.

It may be necessary for governments to continue to subsidise wheelchair accessible services to ensure adequate supply of these services. However, we do not consider there should be any **restriction** on the supply of licences for booked or unbooked services.

We do not consider that arrangements for supply of licences should be any different outside Sydney.

Recommendation

23 That the regulatory framework for point to point transport services should not restrict the supply of licences for any services.

Discussion point 16: Should there be any restrictions on where taxis can operate? If so, how many taxi and hire car operating areas are required across NSW and why? What are the options for broader operating zones?

A more competitive market without supply restrictions should allow for the removal or rationalising of operating zones for taxis.

Recommendation

24 That the regulatory framework for point to point transport services should not include operating zones for the services.

Discussion point 18: The taskforce invites comment on whether industry adjustment assistance should be considered, and if so, how it might be structured.

The recent changes in the point to point transport industry are happening as a result of technological innovation and competition, and are delivering positive results for consumers. Other industries such as music, book and video retailing in particular, and brick-and-mortar retailing more generally, have been similarly affected. Incumbent players and traditional business models must adapt or go out of business. This is how markets develop and those affected are not normally compensated.

However, as noted in the introduction to this submission, the regulatory framework must also adapt, and this presents an opportunity to address some of the accumulated problems of decades of restrictive regulations. We expect that if our recommendations in this submission were adopted, this would lead to more rapid erosion in taxi licence values. If supply restrictions on licences are removed, and services regulated in a more streamlined way, most incumbent drivers and operators in the taxi and hire car industries will be better off, or no worse off. However, taxi and hire car licences will drop significantly in value, faster than they would have by technological change alone, adversely impacting their owners.

When examining similar issues in Victoria, the Taxi Industry Inquiry found:

Despite concluding there are no compelling legal, economic, equity or policy arguments for compensating licence holders, the inquiry accepts that some owners may suffer significant financial difficulties as a consequence of the reforms. The inquiry is suggesting to the Victorian Government that it consider providing tightly targeted assistance where such financial difficulties can be demonstrated.¹⁵

IPART concurs that, while there are no compelling arguments for compensating licence holders, some individuals may suffer significant financial difficulties and considers that the NSW Government could establish a panel to assess targeted assistance where financial hardship can be demonstrated on a case by case basis.

7 Compliance and enforcement

Discussion point 19: The taskforce seeks comment as to what an appropriate compliance and enforcement strategy should be. For example, what kinds of activities should be the focus of the regulator, and which entities should be the focus of compliance activities?

How might compliance and enforcement powers and penalties be adjusted to better reflect any new compliance strategy?

Are there any new powers that the regulator should have?

Should there be any change to the penalties?

How could co-regulatory and self-regulatory approaches be better applied?

The recent Green Paper from the WA Government, *On-demand Transport: a discussion paper for future innovation*, includes a useful discussion on accountability for point to point transport services.

A revised regulatory framework in NSW will need to ensure that the providers in the supply chain for point to point transport have clear accountabilities, and that the regulator is empowered to enforce those accountabilities.

Within that outline, there are a number of options for where accountabilities lie, and the tools required to manage those accountabilities may differ. For example, the WA government is proposing to define 4 key roles in the industry:

- ▼ The dispatcher [or booking service].
- ▼ The licence holder.
- ▼ The vehicle owner.
- ▼ The driver.

¹⁵ Victorian Taxi Industry Inquiry, *Final Report: Customers First – Service, Safety, Choice*, September 2012, p 14.

This removes the concept of a network that provides bundled safety and booking services, and places more responsibility on the licence holder (or owner) than had previously been the case.

In Victoria, on the other hand, after the taxi industry reforms, the regulated roles are:

- ▼ The Network Service Provider (which provides booking and safety services).
- ▼ The taxi operator.
- ▼ The taxi driver.

However, with the removal of mandatory affiliation, most of the regulatory responsibilities now lie with the taxi operator, who can meet some of them by affiliating with a Network Service Provider, or by selecting other service providers. Licence owners continue to have no regulatory responsibilities.

With regard to compliance, the regulator requires sufficient powers to deal with breaches of accountabilities.

IPART's Licensing Framework notes that compliance should be monitored and enforced using a risk-based approach, and optimal compliance regimes involve targeted inspections rather than blanket inspections, and exceptions reporting rather than periodic reporting.

Penalties for breaches should be commensurate and scaleable. Where the only penalty available is removal of a network authority, a breach would have to be catastrophic to justify levying the penalty, rendering the penalty regime essentially ineffective.

Brian Wilkins

Secretariat
Regulation of Point to Point Transport
Level 7, 12 Castlereagh Street
Sydney NSW 2000

September 25th, 2015

Response to Transport for NSW on the Point to Point Transport Taskforce

Firstly, congratulations to Minister Constance for his choice of such eminent professors Gary Sturgess, AM and Tom Parry, AM to oversee this task force.

As the President of the NSW Taxi Industry Association, President of the NSW Country Taxi Operations Association, Vice President of the NSW Taxi Council and a current long term taxi operator (50+ years) I am expressing my concerns and opinions on not just a 'City Centric' appraisal but also from a rural and country perspective where I operate a small fleet of six (6) taxis, two (2) hire cars, a stretched limousine and a maxi taxi that I use in high demand periods to ensure my client service levels are always respectable.

In 2014 the regulations controlling taxis were updated after a prolonged period taken by our controlling body and eventually after a series of meetings with our industry these new regulations were approved but still not enacted. Now, twelve months down the track we are again confronted with change because an unauthorized, unregulated entity has entered the point to point transport market and is declared by government as illegal. But our controlling body, Roads and Maritime Services has to be kind to them, completely mishandled the policing of this illegal service, and their efforts to prosecute these illegal operations has been pathetic.

The Taxi Industry does not object to competition providing it is on a level playing field. However, it is un-Australian and condemning of our society for any government or government body to allow this type of intervention into an industry that has supplied point to point transport to the people of Australia for at least 130 years with no direct subsidies or costs to government.

In the early 1950's the NSW taxi fleet was fairly small and most small and large towns had hire cars operating as quasi taxis. The government of the day offered these operators the option of converting to taxis providing they installed two-way radios and formed cooperatives throughout the state to service the needs of the travelling public. This offer was taken up promptly and by 1958 the Sydney Metropolitan Area had thirteen (13) Taxi Cooperatives servicing Palm Beach to Helensburg and the Eastern seaboard to Nepean River (Emu Plains).

This heralded a new era of taxi transport and over the years we have followed technology and continually updated our system at no cost to government. In fact, we have had phone apps available

for the past two (2) years. Our national booking application, iHail, has been held up for the past nine (9) months by the Australian Competition and Consumer Commission who appear to move at glacial speed.

From this synopsis you should appreciate our industry has achieved all of these milestones under a regulated system that ensured that at all times our clients (customers) were our number one concern in regards to safety and reliability.

In regards to country and rural taxi services, the threat of an 'Uber' type service is still relevant as any IT hotshot could copy the platform or similar and start up in any area they choose. However, the survival of taxi services in country NSW is not just keeping illegal services out, but also controlling the insurgence of community transport, courtesy buses, T.V. licenses and rogue hire car operators who operate as quasi taxis. For country taxis to continue to provide 24/7 service to clients, our industry needs to be given the opportunity to tender for Home and Community Care work, non-urgent patient transport and any government funded transport that can be serviced by the taxi industry. It is bewildering to me that whilst Transport for NSW has control of the taxi industry, Roads and Maritime Services controls licensing, accreditation and enforcement. I'm sorry to say this system is not working and we as an industry are suffering, because in my humble opinion RMS is letting the team down.

Thank you for receiving my submission.



Brian Wilkins
President, NSW Taxi Industry Association
Senior Vice President, NSW Taxi Council
President, NSW Country Taxi Operations Association

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25 September 2015

The Secretariat
Regulation of Point to Point Transport
Level 7- 12 Castlereagh Street
SYDNEY NSW 2000

Email: pointtopoint@transport.nsw.gov.au

Dear Sir/Madam

Thank you for the opportunity to provide input into Point to Point Transport Discussion Paper.

Regional Taxilines Pty Limited is the operator of country taxi services in several NSW regional cities, operating 10 taxis in Griffith, 6 taxis in Tahmoor, Picton, Bargo & Thirlmere, 6 taxis in Camden and 5 taxis in Dubbo.

Rural and Regional Taxi Services

Taxi services in areas outside of Sydney are being provided to a high standard, as is evidenced by the negligible level of complaints received through the Government's independent customer feedback management system (CFMS). It should also be noted that there is a much higher proportion of taxi owner operators in country NSW.

Regional Taxilines would like to highlight to the Taskforce that increasing competition from the illegal activities of some hire car operators, impacts of courtesy transport as well as tax payer funded Community Transport have been having a negative impact on a number of taxi operators in rural and regional NSW including ourselves, to the extent that some are now only marginal and are considering exiting the industry.

The issue of illegal hire car activities has prompted the NSW Government to introduce specific regulatory measures to define pre-booking times and implement other measure to reduce the negative impact of illegal hire car operations.

[REDACTED]

The illegal and unfair competition makes it increasingly difficult to operate a profitable country taxi business.

The issue of Community Transport is more complex and in some cases problematic. Community Transport generally provides services to the frail and aged and is funded through extensive Commonwealth, State and Local Government grants and subsidies. This provides a competitive advantage to Community Transport in the provision of transport services, and strong anecdotal evidence suggests that this is having a material impact on taxi operators and drivers, particularly in rural and regional NSW. This issue raises questions about competitive neutrality and is a matter that is being reviewed separately by the NSW Taxi Council given the impact Community Transport is having on the taxi industry, particularly in Country NSW.

In many instances, towns in rural and regional areas are 'over-cabbed' and as a consequence, there are currently nearly 50 licences, or approximately 5% of the NSW Country taxi fleet currently on hold.

There are also other key externalities that are affecting rural and regional NSW that have flow-on impacts to country taxis. Rural and Regional NSW generally suffers from lower economic growth than major urban centres, higher unemployment²¹ and also has a faster ageing population. In some instances, rural and regional towns suffer population decline, particularly where a major industry that is critical to a rural centre closes.

The situation facing rural and regional centres generally, including those in NSW, has been well summarised by Mr Paul Collits, an Adjunct Senior Lecturer at the University of NSW and a manager of policy in the Former NSW Department State and Regional Development. Mr Collits states:

A number of regional problems have surfaced over recent decades that have demanded the attention of policy makers and generated calls by regional interests for ameliorative action by governments. These problems include the sudden economic shocks caused by downturns in "one industry" towns" as a result of economic restructuring; the continued emptying of the inland; the ongoing (and increasing) domination of State economies by their capital cities as a result of the processes of globalisation; increasing disparities within and between regions across a wide range of social and economic indicators; and environmental pressures and high unemployment in rapidly growing coastal regions²²

This is why the NSW Government has developed a range of investment subsidy programs for rural and regional development to help stimulate economic growth, improve employment conditions and respond to key policy challenges such as the rapid ageing of the population, particularly in coastal towns²³.

There are also complex cross border issues that the NSW Government and the NSW Taxi Industry is seeking to resolve; issues which are having potentially negative financial impacts for country taxi operators, and unilaterally adding more licences to these situations will only exacerbate these problems.

Furthermore, under the current arrangements of the Passenger Transport Act, 1990, there is no statutory limit on the number of taxis in rural and regional NSW, and an application for a licence in areas outside of Sydney can be made at any time. The price for the licence is determined by the market based on the value set by transactions of taxi licences in the relevant region or through a transparent competitive tendering process. In addition, there are significant subsidies for WAT's in country areas, which are available at no cost to the applicant, and financial support by way of interest free loans are available to applicants for assistance with the establishment costs associated with a WAT.

It is considered that the Taskforce needs to closely examine the issue of rural and regional point transport services and recognising the market sensitivities in rural and regional towns, establish a more level playing field that ensures that privately funded taxis are sustainable into the future.

It is also recommended that, as stated earlier in this submission, that the provision of peak availability licences be reviewed for rural and regional NSW to assist taxi operators in dealing with peak demand periods.

²¹ For example, Wollongong's unemployment rate is generally 1.5% higher than the notional average - Source: Wollongong City Council, *Economic Profile*, www.economicprofile.com.au/Wollongong, 6 February 2014

²² P. Collits, *Small Town Decline and Survival Success Factors and Policy Issues*, The Regional Institute Ltd, www.regional.org.au, downloaded on 6 February 2012

²³ For example, the Commonwealth Department of Infrastructure and Regional Development manages the Regional Development Australia Fund. The NSW Government also has similar regional economic development programs

Taxi Driver/Industry Training

We understand that The NSW Taxi Council is concerned that the relevance of taxi industry training is being questioned, particularly at a time when the NSW Taxi Council is investing in skill development in the industry to improve service quality outcomes.

The provision of public passenger taxi services requires a high level of skill and competence by all participants to ensure that these services are delivered in a safe and reliable manner. Driving and operating taxis are professions. These are not activities that can be delivered by poorly skilled and untrained individuals. Key competencies are required to be established and maintained to ensure that the service that is to be delivered to the public is of the standard required by the relevant government and meets the expectations of the consumer.

The NSW Taxi industry has been delivering training at all levels of the industry for a number of years. The NSW Taxi Industry has led the development of training. The NSW Taxi Industry offers a range of training to taxi drivers and taxi operators for job readiness and professional development.

The NSW Taxi Industry has also been advocating for many years now for mandated training in order to gain a renewal of a driver authority from the NSW Government. This would aid driver skill development and maintenance of competencies as well as allow the NSW Taxi Industry to drivers remain current with relevant legal and business practice changes.

Community Transport

Reliance on community transport as an alternative transport option is becoming even more critical as the population ages and an increasing proportion of the population find it difficult to access conventional public transport systems.

The NSW Taxi industry recognises that it needs to expand their service offering in order to remain sustainable, particularly in regional areas. Building partnerships with community groups and all levels of government is critical for the NSW Taxi Industry to ensure the transport cluster can service growing community needs. This is evidenced only this week when Dubbo Radio Cabs Cooperative, submitted a proposal to Transport for NSW, in response to the RFP for Dispatch of Community Transport work in Dubbo area.

The NSW Taxi Industry is uniquely placed to provide efficient, reliable and high quality transport for high needs groups such as those being supported by Community Transport. It is privately funded and has sound internal structures and procedures to provide viable and cost effective solutions for the Government when it is purchasing community transport services.

In regional and remote areas some taxi groups are in decline. These taxi groups experience high demand at weekends and night time but are facing increased competition from hire cars, courtesy transport, as well as community transport organisations for critical weekday work. The sustainability of the NSW Taxi Industry in these regional communities will rely heavily on their ability to deliver community transport services going forward country taxi operators cannot operate a viable business purely on a busy Friday night and Saturday night shift, we need to have a steady work load 7 days per week.

The increasing demand for social services and recent policy changes focusing on individualised service provision for the disabled and elderly has stimulated an increase in the amount of funding being made available to delivery community transport services.

Coinciding with these recent policy changes, there has been a number of reviews into the appropriate level of funding required to deliver community transport services. The quality of community transport services and the value for money currently being delivered has also been under review. The findings from these reviews identified the following initiatives as necessary to ensure the community transport sector remains efficient and cost effective into the future:

- More robust and transparent funding structures which minimise cross subsidisation
- Transparent and consistent reporting requirements
- Flexible, consumer directed service provision
- A focus on efficiency and cost saving
- Improved quality and safety.

Regional Taxilines requests that the Taskforce closely examines this issue as part of its deliberations and puts forward options as to how the taxi industry can play a greater role in the provision of Community Transport services.

Whilst it is acknowledged that there have been recent changes to the CTP in NSW and that further reforms are being considered in this context, we consider that the NSW Taxi Industry can deliver quality services at more efficient rates.

Courtesy Transport

Courtesy Transport is a key part of the point to point transport market, however Regional Taxilines is concerned at the proliferation of these services and the impact that they are having on the NSW Taxi Industry, particularly in rural and regional NSW. The establishment of a courtesy bus in a small rural and regional town can render the taxi service unviable almost immediately and leave that town without an essential passenger transport service as a consequence.

Regional Taxilines acknowledges that many pubs and clubs are under increasing competitive pressure and that a courtesy bus is becoming an important means of improving a club's competitive position. We are also aware however, that courtesy buses can be a significant financial liability to pubs and clubs and that if effective low cost taxi services can be provided as a substitute, then this need can be effectively managed.

There are numerous examples around NSW where pubs and clubs have entered into contracts with taxi providers to provide taxis for their patrons at subsidised rates, thereby creating a win-win for all stakeholders in this context. The NSW Taxi Council is therefore encouraging its members to engage with their local pubs and clubs to establish more of these arrangements where this is possible.

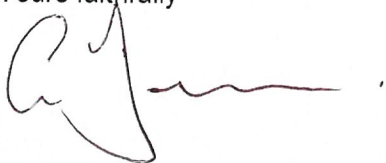
Whilst the Regional Taxilines is not opposed to courtesy transport, it does however seek greater regulatory clarity on what courtesy transport is permitted to do, as well as the strengthening of compliance measures where courtesy transport breaches these laws.

Courtesy transport operates at a distinct competitive advantage to the taxi industry in that it offers free transport. Given that pubs and club are key trip demand generators for taxi businesses then this competitive advantage is significant in terms of its impact on privately funded taxi services. As outlined above the long term impact of courtesy transport is that it can reduce the viability of the local taxi service and ultimately, combined with other competitive pressures such as Community Transport, render the taxi service unviable. This in turn leads to a situation where a community is without an essential public transport service and the State ultimately is required to step in and provide funding to address this transport disadvantage, usually through the provision of more Community Transport.

Regional Taxilines therefore believes that the regulatory framework needs to recognise this risk and that the regulatory framework ensures that courtesy transport is better defined and that associated compliance measures provide an effective deterrent for breaches of the law.

Thank you once again for the opportunity to provide our thoughts on this critical taskforce review.

Yours faithfully

A handwritten signature in dark ink, consisting of a large, stylized initial 'G' followed by a series of connected loops and a long, horizontal, wavy line extending to the right.

Geoff Ferris
Managing Director

20 September 2015

Secretariat

pointtopoint@transport.nsw.gov.au

Dear Sir/Madam,

We are making this submission in response to the "Point to Point Transport Taskforce Discussion Paper – August 2015". We are a family involved in the taxi industry as follows:

- Rouhana Atra
Taxi plate owner

- Buddy Atra
Taxi driver

- Edward Atra
Taxi driver

We have almost sixty years of combined experience in the taxi industry and have never been in such a dire state as we are experiencing currently. The last five or so years has been extremely difficult with the release of hundreds of additional and unnecessary taxi plates, the downturn in the economy and the introduction of lockout laws in Sydney. However, the most damaging factor on the taxi industry has been the commencement of UberX operations.

We have felt severely let down by a government that has done nothing to prevent the proliferation of this illegal activity. This activity operates in full view of the public and police, the general public use it without any hesitation, UberX is even advertised on commercial radio. Yet no action has been taken against Uber and/or its drivers.

It is extremely insulting to the hard-working, law abiding taxi drivers and operators of this state that it has continued on without hindrance and has expanded at an exponential rate to the point where it has become financially unviable to own or drive a taxi. We are proud Sydney taxi drivers but our incomes and capital investment have been severely eroded to the point where we are seriously considering exiting the industry.

We implore the taskforce to outlaw UberX and other "ridesharing" services. They have already severely affected the taxi industry through their complete disregard for the state and country's laws and legalising their activities would be the final nail in the coffin for the taxi industry.

Our responses to discussion points are listed below:

Discussion point 1:

Taxi drivers' income can become more sustainable via the following:

a) Eliminate “ridesharing” services

UberX has effectively added thousands of additional “taxis” to the public which is obviously diluting the earnings of legitimate taxi drivers. The number of taxi licences has always been regulated by the government for a reason – to provide a more sustainable taxi industry.

In recent years, the NSW government has issued many new and unnecessary taxi plates which were surplus to the needs of the public. This, coupled with other factors (e.g. slowdown in economy, changes to lockout laws etc) has left the industry in a bad state whereby taxi drivers' incomes has significantly been affected even before UberX illegally entered the market. UberX has now made this situation dire for taxi plate owners and taxi drivers.

By legalising UberX you will definitely be putting downward pressure on taxi drivers' incomes as you won't be able to cap or restrict the number of UberX vehicles on the road thus every single driver will suffer as more and more drivers compete for less work.

If “ridesharing” is to be legalised the government must reduce the number of taxi plates in the market and restrict the number of “ridesharing” vehicles in order to maintain an adequate level of income for taxi drivers and owners. However, we do not believe Uber to be ethical and law-abiding enough to adhere to the restrictions on numbers if imposed.

b) Reduce taxi fares to increase demand

The general public's perception of taxi fares is that they are too high. Fares should be reduced to allow more frequent use by the public. However, this can only occur if taxi operator's costs are also reduced. The regulatory burden on taxi operators and drivers needs to be reduced as it is the main contributor to the level of taxi fare prices.

The government needs to look at ways insurance costs can be reduced (CTP and workers compensation), there could be scope to make taxis exempt from paying tolls or receiving a cash back for tolls which also reduces customer confusion when added to fares, taxi networks could look to charge operators on a radio booking accepted basis instead of a large, flat fee per month which would encourage increased marketing and customer service by each taxi network.

c) Compensation provided to plate owners to reduce fares

Providing an “industry adjustment package” to taxi licence owners by way of compensation for the massive fall in plate values would assist in reducing pay-ins made by drivers as the cost burden to the plate owner is significantly reduced. Reduced pay-ins would ensure any reduction in taxi fares would be fairer for taxi drivers.

Discussion Point 2

We believe that taxi networks need to be authorised, however, it needs to be done on a consistent basis. Simplifying the complex application requirements would make this process less burdensome for the government and new entrants. Having a system whereby authorisation is not in place would encourage the proliferation of rogue operators/networks which put their own needs ahead of the public and the law as is the case with UberX.

UberX has a "win at all costs" attitude as can be seen by the continuing flouting of the law, payment of drivers' fines, opposition to the Australian Taxation Office directive regarding GST etc. Companies like these do not have a place in this country as they believe they are a law unto themselves whilst the honest, hardworking taxi operators/drivers are the ones who suffer.

UberX does not care about employment in this country. [REDACTED]
[REDACTED] . Once self-automated vehicles come into existence their own drivers will be terminated and profits will be shifted offshore costing the government billions in taxes, fees etc.

Discussion Point 3

We believe this point is not relevant in today's society. Sydney today is much different to what it used to be many years ago. We do admit that there was a time when there was an undersupply of taxis available to the general public which caused many people distress when needing to catch a taxi. This was particularly the case around the Christmas party period, New Years Eve etc maybe around 10-15 years ago as options were very limited. Now, there are so many forms of transport available to the public. This is not even factoring in the new light rail system to the eastern suburbs, the Northwest rail link etc.

Sydney is now more of a 24 hour city in that retails outlets open later and more days in the week than say 20 years ago, there are more entertainment venues all over the city and the increase in population has meant more residential dwellings in Sydney, particularly the CBD which used to be a ghost town on weekends. Attitudes have now shifted whereby people are now willing to work all hours (not just 9-5) to make a living.

Over all our years in the taxi industry it has never been an easier time to catch a taxi as it is now. Even during peak periods and changeover many taxi operators/drivers have adapted to working through these times to maximise income. This occurred even before UberX entered the market but again UberX has made the situation desperate for taxi drivers where now, for example, there would be queues of vacant taxis at 3am, Saturday night outside Sydney's popular nightspots struggling to pick up a fare.

We, as taxi drivers, have experienced first hand both hire car and UberX drivers illegally touting for work. Who is to say that UberX vehicles won't have vehicle signage one day? This will mean that taxis only competitive advantage will disappear as other drivers break the law for self gain. Deregulate the taxi industry and you will be left with desperate people in a race to the bottom.

Discussion Point 4

A sustainable taxi industry will ensure the availability of wheelchair accessible taxis. A situation where "ridesharing" services takeover will be disastrous for the disabled people of the city as there will either be no services available to these people or the government would be the entity which would solely need to provide this service which would result in a massive increase in cost to the taxpayer as it would need purchase a fleet of accessible vehicles, operate and maintain them.

Wheelchair accessible vehicles must be tightly regulated as these members of society are the most vulnerable and must be protected through a regulated taxi industry with high quality standards.

Discussion Point 5

"Ridesharing" operations you refer to need to be BANNED. We do not understand why they are referred to by this name. Ridesharing/car pooling in the traditional sense is when a person travels from "A" to "B" and another person happens to be travelling in the same direction. This passenger would then be given a lift and either not be charged or maybe contribute a few dollars for petrol.

These "ridesharing" operations you are referring to do not satisfy this definition. They are rogue taxi services which operate outside the law. They involve people driving in vehicles all over Sydney to pick up strangers going in various, random directions for a fare just like a taxi service. The compensation they are getting is almost on par with a taxi fare, sometimes even more, yet they are still stupidly referred to as "ridesharing"!

If you are to allow operators like UberX to continue, there needs to be more evenness between taxis and "ridesharing". The regulations that apply to the taxi industry need to apply to UberX. Otherwise, the taxi industry regulations need to be more lax while "ridesharing" needs to abide by the law and have increased regulations imposed.

Currently, taxis bear the regulatory burden which is imposed by the government whilst UberX does not even operate within the law. They have effectively taken back the taxi industry where it was 30-40 years ago before there were rules on which type of vehicles can be used, the colour of the vehicles, uniforms for drivers, security measures implemented etc. All these regulations came into place for a reason.

How is it fair that a taxi operator needs to spend \$35-\$40K on a large vehicle for the privilege of operating a taxi (<http://www.transport.nsw.gov.au/operators/taxis/taxi-operators>), when an UberX driver can use a \$5,000 Toyota Corolla or Honda Civic to do the same job we are doing. A taxi vehicle can only be used for 6 years from manufacture whereas UberX stipulates 10 years. The list of eligible vehicles needs to apply to both the taxi industry and "ridesharing" consistently.

UberX vehicles could potentially be on the road longer in a day than taxis. Currently, our two taxis are on the road for around 12 hours/day as it is a family business and finding drivers is extremely difficult in the current environment. How is it fair that we pay around \$6,500 in CTP per taxi when an UberX vehicle, which can be used in the same way as a taxi (one car used between 2 drivers working 12 hour shifts each day) pay only the standard amount which is an average of around \$500.

"Ridesharers" should be classed as taxis for CTP premium purposes and charged the same way. "Ridesharers" should either pay the same amount as taxis or premiums for both groups could be averaged out to say around \$2K-\$3K per year. This will ease the burden on taxi operators and make "ridesharers" pay their fair share as both can be used in very similar ways. It will also eliminate confusion for insurance companies who currently can insure for "occasional" business use but how would "occasional" be proven in the event of a claim?

Taxi drivers are required to complete a course at a significant course, complete an English assessment, wear a full uniform, fill out timesheets, maintain a driver authority, attend courses, have medical examinations done, have a zero alcohol reading when behind the wheel, be subject to criminal checks etc whilst UberX drivers DON'T.

UberX drivers should be required to complete the same course as taxi drivers as they are providing the same service and require customer service skills to perform their service. An English assessment should also be performed by UberX drivers as they are required to communicate to passengers the same way as taxi drivers. We (Buddy and Edward) were born

and raised in Australia and completed our HSC here but we still had to complete the English assessment. Why should UberX drivers be exempt from this? They could be exposed to volatile situations or cause conflict with passengers due to their lack of English skills.

Taxi operators are required to maintain high levels of insurance, attend to quarterly, thorough inspections, pay accreditation fees, abide by strict regulations imposed by the government to operate a taxi vehicle etc whilst UberX drivers DON'T.

They have flouted the law, encouraged drivers to break the law, paid fines imposed on their drivers, and charged ridiculously expensive fares on the day of the Sydney Martin Place siege. This organisation should not be given the time of day. They have disrespected our laws and processes and shown no respect to the government or the RMS. If this organisation acts in this manner now whilst there are strict laws and regulations, how do you think they will act if and once they are allowed to operate? They will flood the road with UberX cars and control would have been lost altogether.

Discussion Point 6

As discussed in point 5 above, the rules need to apply more consistently.

Only through the establishment of a public vehicle authority will this be effective. There is no point streamlining regulations if there is no central body to enforce it.

Discussion Point 7

The current regime applied to taxi drivers is reasonable. Any laxing of these standards would pose a risk to the driver and general public's safety. These rules need to apply more consistently for professional drivers. Any medical tests that taxi drivers are subject to should apply to "ridesharing" drivers to as they could spend just as much time, if not more, on the road than taxi drivers.

If UberX is allowed to operate, there must be an enforcement body created to enforce the law. The RMS was not created as an enforcement agency and this is evident in their lack of success in curbing the illegal UberX drivers. This shows how ineffective they have been in enforcing the Passenger Transport Act.

Discussion Point 8

"Ridesharers" should have their registrations classed as business instead of private and be made to pay higher fees.

Online registration should also apply for taxis instead of having to visit an RMS branch in person with inspection papers.

Discussion Point 9

Due to the decrease in the use of cash to pay for taxi fares, the risk of theft is significantly reduced. In saying this, we still believe security cameras are a necessity for taxis and "ridesharers".

"Ridesharing" drivers/passengers are also still at risk of assault even though no cash is involved in their business. This could be from a dispute with a drunken passenger, dispute over route taken, argument between driver and passenger over personal opinions, act of sexual assault etc.

The phone used by the driver or passenger may not necessarily be theirs as it could be stolen, turned off or someone else's phone being used. Proving who the driver or passenger was in this situation would be problematic without security footage.

Given the evolution of technology and proliferation of security equipment, security cameras should be reasonably priced. However, as a taxi operator I believe the amount paid for security cameras is still currently exorbitant. Cheaper but effective options should be made more available to taxi operators besides the current approved list (<http://www.transport.nsw.gov.au/operators/taxis/taxi-safety-and-security-systems>) and the same rules should apply to "ridesharers".

Discussion Point 10

The current system in place for the taxi industry is necessary (e.g. background check of drivers) and should be applied to "ridesharing" too.

Discussion Point 11

As discussed in point 5 above, UberX vehicles could potentially be on the road longer in a day than taxis. Currently, our two taxis are on the road for around 12 hours/day as it is a family business and finding drivers is extremely difficult in the current environment. How is it fair that we pay around \$6,500 in CTP per taxi when an UberX vehicle, which can be used in the same way as a taxi (one car used between 2 drivers working 12 hour shifts each day) pay only the standard amount which is an average of around \$500.

"Ridesharers" should be classed as taxis for CTP premium purposes and charged the same way. "Ridesharers" should either pay the same amount as taxis or premiums for both groups could be averaged out to say around \$2K-\$3K per year. This will ease the burden on taxi operators and make "ridesharers" pay their fair share as both can be used in very similar ways. It will also eliminate confusion for insurance companies who currently can insure for "occasional" business use but how would "occasional" be proven in the event of a claim?

Discussion Point 12

Improving customer satisfaction with fares comes down to having a simplified and consistent fare structure. As discussed in earlier points, the shortage in taxi supply no longer exists. For this reason, fares should be consistent throughout the day and week. This would include actioning the following:

- a) The abolition of tariff 2 and 3 fares which increase fares by 20% along with a higher flag fall after 10pm Friday and Saturday nights.
- b) Booking fees should also be abolished as the oversupply in taxis means there is no longer an incentive required for drivers to take radio bookings.
- c) Having taxis exempt from road tolls or having a cash back system for tolls for taxis would mean there is no addition to the metered fare as the driver would be reimbursed for any tolls charged. If this cannot occur, then maybe the flag fall could be increased or have the metered fare adjusted slightly to incorporate an average number of tolls a taxi driver would incur so that the driver would absorb the cost of tolls instead of passing on to the customer the additional charge.

- d) Eliminate the credit/debit card surcharge. This is a bug bear for many customers who have to pay even more when catching taxis. It has also been a source of arguments in the past as passengers are confused as to why they are being charged more than the metered fare.

The above would ensure that the fare on the meter is the one that is charged to the customer at any time of the day, on any day of the week.

In saying the above, we believe levels of trust regarding the correct amount being charged is untrue as the meter clearly shows the fare payable, is secured to the car to avoid tampering and can be escalated to the network for calibration testing.

Discussion Point 13

Taxi fares should still be consistent across all taxi networks as it is today. Allowing Sydney taxi networks to have different fare structures would create even more confusion for passengers and disenchantment between taxi drivers if a particular network is favoured by passengers over another. That is why GST is compulsory for all taxi drivers regardless of level of income.

The current system of a government approved fare structure should continue. However, instead of an annual review perhaps fares should be reassessed every 3 years.

Regarding meter standards, with the progress of technology there should no longer be a need to manually add tolls to a fare. If the taxi passes a toll point, the meter should automatically add the toll cost to the meter. GPS technology would be used to enable this to occur.

Discussion Point 14

Service quality should be monitored by taxi networks with complaints to be taken more seriously in that repeat offenders are suspended or fined by their network. The RMS and NSW Police should be involved in issues relating to vehicle defects (inspection reports to be provided to the RMS for all point-to-point passenger vehicles) and criminal/traffic offences.

Discussion Point 15

Even though most taxi drivers would agree that the government has not done a good job of managing the number of taxi plates in Sydney in recent years we believe that it should still manage the supply of taxi licences based on demand as it is far better than the other option – i.e. leaving it to market forces.

This is vital to ensure a viable taxi industry. Allowing “ridesharing” to continue would negate this as they could place an unlimited number of vehicles on the road. A government imposed limit of cars used by UberX would be problematic as it would be difficult to enforce and they have been shown to show a complete disregard for the law since the time they commenced operations and would not abide by any imposition put on them.

They want every car in Sydney to be Uber, a stupid proposition in that it will mean the end of the taxi and hire car industries and UberX drivers will make very little leaving the company as the only one to profit which is not surprising coming from them.

Discussion Point 16

We believe there should not be any restrictions on where taxis can operate. It is extremely rare for a Sydney taxi driver to pick up a passenger who wishes to travel outside the Sydney

metropolitan areas, especially in the current climate. In our experience we have only received maybe a handful of requests to travel outside the metropolitan area. In fact, compared to 5-10 years ago, large jobs (e.g. City to Penrith, City to Cronulla) are becoming much less and less frequent as time goes on due to cost pressures, alternative transport arrangements or people choosing to remain in their local areas instead of travelling.

Having restrictions or zones where taxis operate will only add additional regulatory burden to the government when they could be focussing on the important issues facing the industry.

Discussion Point 17

As explained in discussion point 15 above, the government should manage the supply of hire car licences instead of leaving it to market forces. This is vital to ensure a viable taxi and hire car industry.

Discussion Point 18

An industry adjustment package to taxi plate owners is a must. The legalisation of "ridesharing" services has rendered taxi licences almost worthless. Why would anybody purchase a taxi plate in the current market when you can participate in the industry and earn an income with zero capital investment as is the case with UberX? Even if somebody wished to purchase a taxi plate, which bank or lender would provide funds to do this in the current climate due to the risk involved?

Street hails for taxis are reducing at a significant rate due to technology. To argue that there is a significant value attached to taxis as they are the only vehicles to pick up street hails is flawed. Many people can be seen on Sydney CBD streets booking through the UberX application even though dozens of vacant taxis passing them by. If "ridesharing" is legalised it will exacerbate the situation as people will be more accepting of the "ridesharing" apps, UberX will ramp up their advertising and marketing and approach businesses/corporate entities to use their services which will effectively spell the end of the taxi industry.

If "ridesharing" becomes legal this will result in thousands of additional taxi vehicles on the road. The supply of taxis should be reduced to prevent dilution of income and aid in providing sustainable levels of income to taxi drivers. The government can possibly look at a taxi plate buyback scheme whereby it purchases back plates from taxi licence owners who have invested heavily in the industry. This could be selective or industry wide and will act to reduce the number of taxis on the road. Not all taxi plate owners are corporate entities or wealthy individuals. People purchased taxi licences from the government in good faith making a significant capital investment which the government profited from, not to mention the annual fees the government derives. The amount compensated should be the full value of a Sydney taxi plate as at April 2014 (when UberX entered the market).

Preference should be given to those who have participated in the industry over a long period of time and possibly looking to retire. My father is such an example whereby he has been a taxi plate owner, operator and driver for over 30 years. He has spent that whole time paying down business loans only to see his investment now worth very little as he reaches retirement. He was not able to purchase a home due to his financial commitment to the taxi licences he purchased. Now, because the government failed to uphold the law, it is impossible to sell his taxi plates. Without compensation and no superannuation he will be left with nothing and will need to survive off the government pension despite decades of hard work.

The government should impose an annual fee on anyone who wishes to operate a taxi service in an UberX vehicle e.g. \$10,000 per year. Uber should also be levied a hefty fee for the privilege of operating its network. This revenue should be compounded every year in a pool of funds to be paid out to every taxi plate owner to compensate them for the decline in the value of their asset and lost income whilst UberX was illegally operating.

Discussion Point 19

First and foremost the law needs to change to allow enforcement action against those who promote and participate in activity contrary to the Public Passenger Act. This will mean that Uber, the company, can be prosecuted instead of the futile option of trying to prosecute drivers.

The current situation is farcical. The government cannot prosecute "ridesharing" drivers and is unable to impose any sanctions on Uber. Uber can sign up drivers, provide a platform which contravenes the law, promote its illegal service to the public and nothing is done to stop them. Uber is even advertising on commercial radio stations in a bid to sign up drivers to its UberX platform. The government is to blame for this even beginning to occur and continuing without any intervention. It has been totally incompetent and impotent in its handling of the "ridesharing" issue in allowing a foreign company to commence its operations and thrive without any restriction to the extreme detriment of its own citizens.

The penalties which apply to individuals and corporations contravening the Public Passenger Act need to be increased significantly. How is it fair that an accredited taxi driver can be fined \$5,000 for picking up a passenger from the airport departure terminal but an unauthorised UberX driver conducting illegal activities receives a fine for only \$1,700? Monetary fines are obviously not a deterrent to stem illegal "ridesharing" activities. Penalties need to be effective and more severe. This could include suspension of drivers licence, impounding of the individual's motor vehicle and even imprisonment for repeat offenders. Had these penalties been in place and enforced previously UberX would not have been able to grow the way it has.

The RMS and NSW police should continue to enforce and deal with serious matters, e.g. criminal and traffic offences committed by drivers, roadworthiness of motor vehicles etc. Less serious matters, e.g. customer complaints, lost property etc, should be handled by the taxi networks.

Should taxi drivers switch between networks, the new taxi network should be required to obtain a reference of that particular driver from the previous taxi network as to the driving history of the driver including a list of complaints filed against the driver, breaches of laws committed by the driver etc. This will prevent a driver shifting to other networks if deemed unsuitable by one as the new network would not want an unsuitable driver as part of its fleet. If a network suspends a driver from its fleet the RMS should be notified for further action.

We appreciate you taking the time to consider our submission as it is a very important period for the taxi industry and families like ours which are experiencing very difficult times. Please do not hesitate to contact me via email or phone should you wish to discuss further.

Yours faithfully,

Rouhana Atra, Buddy Atra & Edward Atra

Point to Point Transport Taskforce Discussion Paper

J David
Sydney, NSW, Australia

Summary

For anybody interested in public policy, the taxi industry provides text book insights into how rent seekers in a regulated monopoly achieve regulatory capture. For anybody interested in technology and digital disruption, it's also a text book example of how smug incumbents fail to see change heading their way, then put pressure on government to look after their interests.

The focus of this submission is on the questions of:

- should ride sharing be regulated and, if so, how (Discussion Point 5)
- should industry adjustment assistance be considered, and if so, how it might be structured (Discussion Point 18).

It argues that ride sharing services should be recognised by the law, so consumers are given the power to choose the service models that meet their needs the best.

It also argues that there should be no compensation for taxi industry incumbents.

Instead of focusing on providing services that meet public expectations, the taxi industry's business model has been to protect the monopoly rents of licence owners. This business model has failed and left the door wide open to competitors who can offer a cheaper, better quality and more reliable service.

Discussion Point 5: Should ride sharing be regulated and, if so, how?

Ride sharing services should be brought into the regulatory framework under a 'light touch' regulatory model because:

- Ride share bookings are not anonymous. This is unlike when someone hires a taxi at a rank or flag one down in the street. The level of safety regulation that's needed is different.
- It's important not to stymie the ride share industry from being able to pitch their service offering at different levels. It needs to be able to compete on quality and price.
- Ride sharing providers have commercial reasons to make sure the services booked through their platforms are safe and deliver the right level of quality for the price. Their customers wouldn't be using them if they weren't happy with what they're providing. As Uber says, "choice is a beautiful thing"¹.

Any regulation should focus on public safety and be the minimum necessary to achieve that outcome. One approach could be:

¹ www.uber.com

- Requiring ride share booking platforms to publish the standards their drivers and vehicles must meet.
- Requiring ride share booking platforms to publish the steps they take to check that their drivers and vehicles meet those standards.
- Making ride share booking platforms accountable for doing what they said they would do.

Discussions Point 18: Should industry adjustment assistance be considered, and if so, how it might be structured?

It's not acceptable to spend taxpayers' dollars compensating taxi licence owners for any loss of value to their licences because they are facing competition in the on-demand booked market.

Taxis don't own market for booked services

Taxis have the right to accept hirings at taxi ranks or, where their roof light shows they are available for hire so they can be hailed in the street. This is something no other form of transport legally can do, and goes back to before the invention of the internal combustion engine.

Taxis do not own the market for booked services.

The market for booked services has changed

Fast moving changes in technology have meant that bookings can be made and services delivered very quickly.

The legislation that governs taxi licensing was introduced just three years after hand held mobile phones were introduced in Australia. Nicknamed "the brick", they cost around \$4,000 in the dollars of the day (roughly \$10,000 today).

Smartphones were invented in 1992. They also resembled bricks. It wasn't until 2008 that Apple brought the first smartphone to the Australian consumer market.

In Sydney, taxi booking apps and payment like goCatch and Ingogo launched in 2011. They made it easier for passengers to book and pay for taxis. This was a threat to the lucrative payment businesses of vested interests. However, instead of improving services or reducing prices, the industry claimed new booking apps were breaching the law and demanded they be shut down.

Uber launched its UberBlack limousine service in Sydney in October 2012. This was followed by UberTAXI in June 2013. UberX arrived in March 2014, and turned the taxi industry on its head.

Again, instead of lifting its game, the industry is taking refuge behind out of date laws and demanding that government shut them down.

Uber is just one of many companies that are using new technologies to 'breach the moats' of incumbents who have made a lot of money providing shoddy services.

Countless industries have gone, are going, and will go through these kinds of upheavals. The taxi industry has no special claim for protection from change.

Passengers are refusing to put up with bad service anymore

All around the world, taxi industries provide services that are low in quality and high in price. Sydney is no exception.

That's because the taxi industry's business model hasn't been to provide affordable, quality transport services to its customers. If that was the case then there would have been no open door for Uber to walk through.

Instead, the taxi industry's business model has been to protect the monopoly rents taxi licence owners enjoy on their 'investment.' The industry does this by pressuring politicians to retain the status quo and limit increases in supply. It's those monopoly rents that give these licences a value.

Along with high licence costs, the Discussion Paper tells us that the taxi industry is weighed down by a heavy regulatory burden. Some of these regulations are important for driver and passenger safety. However, the rest are in place because the industry wants them.

Rent seekers typically want a heavy regulatory burden on their industry because the more barriers to entry, the harder it is for potential competitors to get a foothold.

The result is a poor quality service that costs users way more than it should.

And they could do this because they've had a captive market.

Former head of the Australian Competition and Consumer Commission, David Cousins, describes app-based services like Uber as a "market industry response to poor performance, generally"².

There's no such thing as a risk free investment

There's a lot of taxi industry talk about people making investments in the industry when they bought a taxi licence. By definition investment carries risk. This is mainly the risk that someone will come along with a product that your customers prefer to yours.

Investors in changing industries who failed to see change coming and adapt quickly enough generally get burned.

There is no case for NSW taxpayers to be asked to guarantee the 'investments' in taxi licences.

The taxi industry should not be rewarded for regulatory capture

² <http://www.abc.net.au/news/2014-11-17/independent-report-on-the-wa-taxi-industry/5897274>

If you accept the idea that the taxi industry owns the market for on-demand services (booked or otherwise), then competition for that market can only come from other taxis.

That means the way to keep monopoly rents rolling in is to make sure that growth in the number of licences is much lower than growth in demand for the services.

The taxi industry has achieved this by maintaining relentless pressure on successive Governments to stymie all attempts at reform.

User might be disrupting the on-demand transport market. Driverless cars will revolutionise it

Ride sharing services may be disrupting the on-demand transport market, but driverless cars will revolutionise it. Possibly in 5 years, certainly in 10. South Australia will trial driverless cars in November this year. Uber is one of the investors behind that initiative, too.

It's not hard to imagine a future where private car ownership doesn't make sense anymore.

Even before driverless cars arrive, car ownership is facing pressure. GoGet, like Uber, already has an app-based booking service for registered users. It's not hard to imagine a GoGet service extension of the future where the car would come when called, rather than requiring the booker to walk to its parking place.

There has never been a time where it makes less sense to compensate taxi licence owners for a loss of value in their licences.

There's no need to compensate licence owners for a loss in value that only exists because of the monopoly rents they have enjoyed for decades

Most (if not all) licence owners have enjoyed high profits from the monopoly rents they have been able to charge. These monopoly rents gave their investment a value in the first place.

The only possible exception is for unsophisticated 'investors' who bought into the market in recent years (and before ride sharing was on the horizon), and who haven't had sufficient time to recover their initial costs.

Even then, it's hard to see why they should be bailed out, and not others who have put their money into a venture at the wrong time and lost.

Conclusion

It's time to put an end to this public policy scandal. Government should put the public interest first, recognise new service models, and give passengers the power of choice.

Taxpayers and disaffected taxi customers do not owe taxi licence owners anything.

Vince Di Lucci

20/08/15

NSW Taxi Industry

To whom it may concern,

I have been in the taxi industry for 28 years, 4 years as a driver and 24 years as an operator. I enjoy the freedom and independence of taxi driving. My morale is at an all-time low. IPART recommendations have contributed to an oversupply of taxis in Sydney. Superannuation is a huge part of Australian's saving for their future. Why is my superannuation being eroded away? I believe the taxi industry had asked IPART to not include taxi license fees in taxi fare pricing. Why was this not followed through by IPART? I am sick and tired of review after review after review. This review needs an open minded and logical approach. It was much appreciated to see the transport minister and the Head of RMS compliance at the taxi council meeting. As an industry we must refine our process management quality by following successful franchise models e.g. McDonalds – consistency of their customer service experience. New innovation technology must be:

- Regulated
- Ethical in business practise
- Respectful of the transport regulations

Any breaches must endure immediate action by the government. More flexible proactive, open-minded regulation must be introduced to the taxi industry by the government. Fair competition means fair innovation. New South Wales already has a ride share provider; the New South Wales taxi industry. Uber X, in my opinion, must no longer be allowed to operate and should be shut down. Why is the Australian Government taking so long to act? If this situation was occurring in aviation, trains or buses would the government have taken this long to impose the law?

I'd like to refer you to a very interesting, 3 ½ minute talk by Andrew Keen all about Uber and its cons.

<https://www.youtube.com/watch?v=er85psPOrM>

New regulations must be introduced to encourage competition and innovation within the Taxi Industry .

1. New authorised network providers with flexible payment systems including monthly fixed payments or per job payment.
2. Increase utilisation rate of existing taxis e.g. lower tariff 1 rate, fixed price option and allow customer flexibility to choose higher tariff rates via network bookings.

3. Flexibility in the way networks dispatch work due to customer request that is I.e. share a taxi.
4. Multiple hiring at airports.
5. Super ranks in the city surrounding suburbs in high demand periods with security and optional multiple hiring.
6. Due to smart phone technology and future technology developments, licences must be capped.
7. Hire cars licences must be capped.
8. With smart phone technology hire cars are virtually taxis.
9. Hire car taxi licence and point to point transport providers licence fees should be comparable.
10. Point to point providers vehicle insurances should be more comparable.
11. Taxi plate owners have invested in good faith, their equity in their licence must be acknowledged if compensation is to be paid.
12. More efficient customer complaint systems.
13. Reform transport regulations to give more powers to RMS, Transport Minister and the ACCC to protect small businesses from unfair competition.

Yours sincerely,
Vince Di Lucci

What do I say to my kids?

Today while driving my kids to the dentist, we heard an advertisement on 96.1 FM promoting the benefits of becoming an Uber driver. My 12 year old lent forward and said I had been wrong about Uber being an illegal service, as they were now advertising on the radio.

She was completely perplexed, when I confirmed it was still illegal

Can you please tell me how I am going to explain to my children how Uber manage to build an illegal service in a way that will maintain their respect for the law and rules?

Uber's success just teaches my kids:

- If you use technology you can disregard the rules and regulations that others follow
- Self-centred work practices such as avoiding paying taxes are acceptable.
- If you work within the law you will be disadvantaged, as you have to compete with others who do not have the cost of compliance.
- If you do the right thing and pay all the compliance costs, you still get no protection from the Government
- That concept of "illegal" is meaningless, when law enforcement is so ineffective.

As a parent all these points go against the values of honest and social responsibility I am trying to instil in my children. My question is am I disadvantaging my children with these "old fashion" values in this new world? What will happen to the social fabric of our society if these values are allowed to be eroded? What will happen to all our essential services if businesses and people stop paying taxes and any ongoing compliance costs to protect consumers and ensure the industry is above board with local laws?

To add to my Uber dilemma, I have to make excuses to our kids as to why we have to now be very careful with what we spend. As a taxi plate owner, Uber and the uncertainty of the taxi industry lead to a fall in taxi plate prices, we have lost over \$70,000 in value from our initial investment of \$425,000 and the scary thing is our lease payments have also dropped, while our loan repayments continue. The kids have noticed how worried we are and constantly ask why Mummy and Daddy are so sad. I stay awake at night worried about our future, especially if the price continues to fall.

It is not fair that a large multinational can set up a business, disregard all regulations, pay no tax and take their profit overseas. Just because it is a multi-national conglomerate does not make it right or a given.

All I ask is for you to implement a fair system, with an even playing field for all!

Please bring back some validity to the License Structure. Businesses like Uber make a mockery of the entire licencing system and our laws. What does a License actually provide if not the some exclusivity and protection?

I understand the need for industries and business to evolve and compete but shouldn't it be done within the boundaries of the law? What type precedent does this create not only in the point to point transport industry? If businesses like Uber are allowed to continue without any checks and balances what will be the flow on effects to other businesses and our community in the future.

Please make the point to point transport industry a fair go industry.

Thank you

Wheelchair Taxi Operator

October 12th, 2015

Andrew Constance
Minister for Transport and Infrastructure
GPO Box 5341
Sydney, NSW 2001

Dear Mr. Constance,

I write to express my concern in regard to the potential impact of any regulatory changes that you may choose to adopt following the recommendations of the Point to Point Transport Taskforce, which I understand are due to be received shortly.

I have not been able to make a representation directly to the taskforce due to time constraints. However, I write in the hope of having my concerns heard with respect to the continuing availability of wheelchair taxi services and the maintenance of appropriate service levels to the community in the event of any changes to the current structure of the taxi industry.

The dynamics driving the provision of wheelchair taxi services are complex, but I will attempt to keep my advice brief.

Executive Summary

Wheelchair taxi operators rely on large subsidies for their viability. The current subsidy model produces a variable subsidy as it is linked to the floating value of unrestricted Sydney taxi-plate rental prices. This subsidy is presently at risk. It has contracted as taxi-plate rental prices have fallen and will contract further going forward.

Business conditions for wheelchair taxi operators are already very tough and we can expect that business conditions will worsen over time even if no changes are made by the NSW Government to the current industry structure.

In the event that the NSW Government does embrace ride-sharing in any form, we can expect a further decline in the business environment due to competitive pressures. In this situation, a new and expanded wheelchair taxi subsidy will be needed to support the industry.

Disabled people, who are wheelchair dependent, do not have any alternatives to the wheelchair taxi service because there are, currently, no other providers of these services. It is very likely that, in the absence of a new and material subsidy, the wheelchair taxi fleet will rapidly shrink, leading to a critical shortage in the supply of transport services to the disabled community.

I respectfully request that, when considering potential changes to the industry structure, you do not forget the social benefits that attach to the inclusion of disabled people within the fabric of society.

Background

The provision of wheelchair taxi services relies on a buoyant demand for regular taxi work, which, in effect, subsidises the provision of wheelchair taxi services.

In this document, I have used the rental prices for ordinary unrestricted Sydney taxi plates as a proxy for the business environment faced by wheelchair taxi operators. The market price for renting an unrestricted Sydney taxi plate reflects the strength of the business environment for the taxi industry in general.

When demand for taxi services is buoyant, the rental prices of unrestricted Sydney taxi plates are also buoyant. This is where the wheelchair taxi operator enjoys an advantage by way of the differential between the cost of renting a wheelchair taxi plate and the cost of renting an ordinary, unrestricted Sydney taxi plate.

This advantage or subsidy is essential to the wheelchair taxi operator's profitability and economic viability. The reason that the subsidy is essential is because the costs of commissioning and operating a wheelchair taxi greatly exceed those that attach to operating a regular taxi in Sydney. I have provided more details on the cost differences below.

We can see immediately that the current subsidy model provides for a variable rate of subsidy. The taxi-plate rental price floats, being determined in the free market, and is currently around \$490/week, although the price has been falling precipitously and is set to fall further on the back of competitive pressures in the industry (see below). The price of a wheelchair accessible taxi plate is fixed at a nominal \$20/week.

The current amount of subsidy to wheelchair taxi operators is in the range of \$470/week. The amount of the subsidy is not fixed, but floats as the differential between the rental rates for unrestricted taxi plates and wheelchair taxi plates. The subsidy has been contracting as unrestricted Sydney taxi-plate rental prices have been falling – down by a further \$35/week in the last month alone. We can expect that the subsidy will decline further going forward, even if no changes are made to the structure of the taxi industry in Sydney.

Buoyant demand for ordinary taxi services results in an increase in supply of wheelchair taxis as operators are lured by the potential returns made available by the business environment. Another way of phrasing this would be to say that wheelchair taxi operators are lured to the market by an expanded subsidy. On the other hand, slack demand for taxi services can be expected to lead to a long-run contraction in the supply of wheelchair accessible taxi services as operators leave the industry due to poor investment returns and difficult business conditions.

This is where the floating nature of the wheelchair taxi subsidy can have unintended effects. During robust business conditions, wheelchair taxi operators will rapidly enter the industry, adding greatly to the supply of wheelchair accessible taxis. However, in a tough business environment, we can expect that wheelchair taxi services will be differentially affected by way of inferior cost competitiveness versus the operation of alternative taxi transport vehicles. In this event, like a canary in a mine, we can expect that business failures in the taxi industry will emerge first amongst the operators of the wheelchair taxi fleet.

If we haven't seen significant numbers of wheelchair taxi operators exit the industry yet, it is only because heavily invested wheelchair taxi operators are eating losses or suffering poor returns to operations in the hope that business conditions will improve.

The NSW Government's response to the recommendations of the Point to Point Transport Taskforce may well be the catalyst that is needed for many, marginally profitable wheelchair taxi operators to exit the industry. In the current business climate, the number of wheelchair taxi operators barely making ends meet is large.

The long-term viability of the wheelchair taxi industry and the viability of the stakeholders within it will depend on the policy adopted by the Government in response to the Point to Point Transport Taskforce's findings.

Current Situation – a perfect storm

As discussed, above, wheelchair taxi operators depend on a robust business environment for the regular taxi industry to provide the economic incentive for their provision of wheelchair taxi services to the disabled community. However, there is already a glut of taxis in Sydney due to a combination of events, which amount to a 'perfect storm' for the industry:

- 1) Exuberant increases in taxi plate numbers by regulators in recent years – increases that are far in excess of the rate of growth in demand for taxi services – have resulted in excess supply, negatively impacting utilisation rates, driver returns and asset returns (taxi-plate rental prices);
- 2) The lockdown in the CBD has curtailed late-night taxi demand significantly – materially impacting night driver returns, returns to taxi operators, and taxi-plate rental prices;
- 3) Deregulation of the market for hire car plates has resulted in a dramatic increase in the number of hire cars operating in Sydney. These are a natural substitute for taxis (particularly in the case of price-insensitive customers). Hire cars are, in fact, a taxi-equivalent transport service and the increase in numbers constitutes an increase in taxi-equivalent transport supply – which negatively impacts returns to taxi drivers and, in turn, reduces taxi-plate rental prices;
- 4) The increase in numbers of shuttle buses and airport/cruise-ship/hotel transfer services – these are an attractive substitute for taxis – particularly in the case of price-sensitive customers (again, impacting taxi-plate rental prices).
- 5) Finally, the illegal operations of ride-sharing services (aka Uber) – a direct substitute for taxi services and an effective increase in taxi-equivalent transport supply. The effect of the introduction of ride-sharing on taxi-plate rental prices is already negative, though the impact may be set to expand very dramatically on legalisation.

The fact is that the market for taxi-equivalent transport services is already oversupplied – we are facing a glut. On a typical Friday night, even as we approach peak season for the taxi industry, Sydney's George Street is awash in a sea of vacant taxi lights – more vacant cabs than customers, a truly difficult business environment for both taxi operators and drivers.

There is simply not enough work available (point-to-point transport demand) to soak up what will be a huge increase in taxi-equivalent transport supply if ride-sharing is legalised. Even if

the cost of using taxis could be reduced, supply is so robust that any increment to taxi demand on the back of consumer demand being price-elastic could be met by the existing taxi fleet without increment to current taxi numbers.

Wheelchair taxi operators, who are already enduring dire business conditions due to the 'perfect storm' outlined above, are struggling to remain in the industry. It is a reality that many operators of wheelchair taxis, who rent wheelchair cabs to taxi drivers, have cabs laid-up that they are unable to rent. These cabs are not rented because the returns to drivers, who normally rent them, have materially degraded.

Moreover, the recent decline in the rental prices obtained by wheelchair taxi operators when renting wheelchair taxis to drivers has resulted in a contraction in operating margins. Margins for wheelchair taxi operators have contracted to levels that are described by many wheelchair taxi operators as the worst business conditions they have ever seen.

Ride-sharing

This 'perfect storm' is the context in which we find ourselves discussing the suggestion that ride sharing should be legalised.

Ride-sharing legalisation will significantly reduce financial returns to taxi drivers, taxi operators, plate owners, and wheelchair taxi operators and drivers.

We can expect that, as returns to taxi drivers diminish on the back of ride-sharing legalisation, taxi-plate rental prices and taxi-plate capital values will decline sharply.

This contraction in taxi-plate rental prices will, in turn, immediately impact the economic viability of wheelchair taxis, which rely on the taxi-plate rental price differential to survive (This is the largest, and most important, component of the current subsidy).

It is reasonable to expect that taxi drivers will quickly avoid renting wheelchair taxis and opt instead to rent more fuel-efficient vehicles with lower maintenance costs; vehicles that are cheaper to rent and more competitive against ride-sharing service providers with their dramatically lower cost base.

As this plays out, it is common sense that wheelchair taxi availability will decline and that there will be a significant decline in service levels to the disabled community.

Without a new and expanded subsidy for wheelchair taxi operators, Uber will "eat the disabled communities' lunch" and 'offshore as untaxed profit' the money that once went to subsidising the transport needs of disabled people in Sydney.

Moreover, disabled people as a group are inherently at risk of social exclusion. Mobility is critical to including them in the fabric of society. This is why the wheelchair taxi service is so very important.

The magnitude of the current subsidy

The current subsidy, around \$470/week, indicates that the cost of providing wheelchair taxi services is large. However, a subsidy of this magnitude is necessary.

As with regular taxi demand, a large component of wheelchair taxi demand is instantaneous. That is, the booking is not made in advance, but is phoned-in for immediate execution. Without a large number of wheelchair taxis in operation, wait-times for taxis for disabled people would increase significantly and many jobs would remain uncovered.

Sydney needs a large number of wheelchair taxis dispersed relatively evenly across the city to keep wait-times within an acceptable 10-15 minutes. The number of wheelchair accessible taxis is what allows a degree of access to taxi services for disabled people that is comparable to the access enjoyed by the broad community. Currently, the wheelchair taxi fleet accounts for something in the order of 10% of the Sydney taxi fleet. There are some 628 active wheelchair taxis in Sydney.

So we see that the current subsidy does not only provide recompense to the taxi operator for the provision of wheelchair taxi services, but it also provides recompense for having those assets available and deployed – even if not immediately utilised. This, overprovision if you like, is what allows disabled people to access wheelchair taxi transport services within reasonable time frames – just like able-bodied members of the community.

The nice thing about the current subsidy structure is that it is inherently inclusive because it is invisible to the community. There are no large, explicit, visible subsidies that might encounter political headwinds when put forward for funding. Moreover, disabled people are generally not aware that wheelchair taxi services are subsidised to this extent and they do not hesitate to use wheelchair taxi services. This is important because the benefits of the inclusion of disabled people within society extend to the broad community. That is, we benefit from the participation of disabled people in society – their participation assists to maximise the social good.

If the current subsidy were to be replaced with an explicit subsidy that was identifiable on a per-trip basis, then these benefits might not be obtained.

The current subsidy structure works well, though the level of subsidy is now inadequate due to the increase in competition within the industry. In the event that the industry is radically reformed to accommodate ride-sharing, the subsidy, as it operates now, will all but cease to exist. In this event, without the direct assistance of the Government, the wheelchair taxi fleet will, in large measure, cease to exist altogether.

Cost drivers for wheelchair taxi operators

Wheelchair taxis are significantly more expensive to commission than an ordinary taxi.

A taxi operator commissioning a Ford sedan as a taxi faces a lower acquisition cost because a car can be obtained second-hand for something like \$12,000. I'll assume this is already fitted to run on LPG. After fit-out costs, the operator has his/her vehicle on the road.

The wheelchair taxi operator faces a \$40,000 conversion cost. A newer or new car is more economical to convert because the cost of the conversion will be absorbed over a longer time-frame. The cost of the converted taxi (mine) was \$78,000 before fit out – more than 6 times as much as a normal taxi using this example.

Wheelchair taxis are significantly more expensive to operate.

The wheelchair conversion adds weight to the vehicle, which impacts fuel usage and running repairs. My Toyota Tarago can easily use upwards of \$75/day in fuel (Tarago's don't like LPG, which can halve the life-span of the motor). In comparison, a hybrid Toyota Camry or a taxi running LPG, for the same mileage, might use somewhere in the order of \$35-\$40 of fuel.

A wheelchair accessible Tarago will, in this example, be up to \$280/week more expensive to fuel-up for a week of operations on a single-shift basis.

Wheelchair taxis are significantly more expensive to maintain and repair. The added weight of the wheelchair conversion puts additional stress on the motor, drive train, and running gear of the vehicle, shortening the lifespan of these components. Moreover, the cars are heavier on tires than ordinary sedans. The more expensive car is more expensive to insure and attracts more stamp duty.

However, the greatest part of the operating costs comes in the later years of the vehicle's life when, though high in mileage, the vehicle is kept on the road because of the cost of the sunk investment in the wheelchair conversion. After 10 years, there is almost nothing on a Tarago that will not have been, at some point, replaced – even door handles and seat slides give way under long-term usage. While parts are expensive, it is the cost of qualified labour required to fix an ever increasing number of issues that eats into the profitability of these cabs.

There really is no comparison. Wheelchair accessible taxis are very much more expensive to commission and much more expensive to operate than a normal taxi. Moreover, while the wheelchair taxi operator may get some maxi work to help offset some of the incremental fuel costs, he/she loses out on street hails – with most customers preferring to hail a regular sedan rather than a maxi taxi.

So, for no real added advantage, the wheelchair taxi operator suffers a very much greater cost of operations than an ordinary taxi operator.

Wheelchair work

Wheelchair work is typically made up of a lot of very short fares. This is because many disabled people are completely reliant on wheelchair taxis for all their transport needs – to get to the chemist, the doctor, the shop, or to go out. In this respect, the wheelchair passenger is similar in many ways to the average DVA client, who is typically elderly, without a licence, and relies on taxis for all his/her transport needs.

Because of the instantaneous nature of much of the wheelchair taxi work and the relatively thin supply of wheelchair accessible vehicles, there are occasions where I have travelled large distances to complete what are very low dollar-value jobs. On one occasion, I was sent from the Hornsby taxi rank to Brookvale to complete a \$15 job. This, while relatively infrequent, does happen

The chap in Leumeah, who wants a taxi home from the club late at night – it takes me 20 minutes to get to him using the expressway (at my expense) and I take \$12.40 on the meter. . I'm obligated to service the needs of these clients as a condition of my taxi-plate, but it costs me time and money to complete these jobs, I do not make anything from them.

Because of the limited number of wheelchair taxis, the distance travelled, and time taken, to reach a wheelchair customer is generally much greater than the average for normal taxi work. This is simply because there is a far greater preponderance of normal taxis.

Wheelchair work is rarely lucrative, it is a service provided by someone with a desire to assist disabled people who is given a sufficient subsidy to make the provision of that assistance economically viable. Left to the free market, it is not work that we can expect would quickly lure economic agents in pursuit of profits to be made.

It is work that requires training, commitment and a willingness to look past the dollars that might be earned elsewhere in order to look after someone who is genuinely reliant on your services. .

For the above reasons, most wheelchair taxi work is not work that would ordinarily be sought after by taxi drivers, or anyone else who enjoys the luxury of being able to cherry-pick their preferred jobs.

I note that Uber did run a wheelchair accessible vehicle trial sometime last year. I'm not surprised that I have not heard anything about the trial since. I presume that it flopped.

Conclusion

With respect to the provision of transport services to disabled people, legalisation of ride-sharing services is not something that should be contemplated in the absence of dramatic increases in subsidies to wheelchair taxi operators. Material increases in subsidies will be required to counter the negative impact of ride-sharing upon wheelchair taxi services and, critically, the availability of those services.

If we see a reform similar to that proposed for the ACT, where taxi licenses are projected to fall to \$5,000/year, or around \$100/week, then the implicit subsidy to wheelchair taxi operators in Sydney would fall to as little as \$80 per week under the current subsidy system. However, the industry is struggling at the moment with a \$470/week implicit subsidy.

It is inconceivable that wheelchair taxi operators would remain economically viable in this event. A dramatic contraction in the wheelchair accessible taxi fleet will occur very rapidly, quickly reducing service levels to the disabled community.

The \$470/week subsidy is the baseline for any subsidy that would surrogate for the current discount on the taxi-plate rental for wheelchair accessible taxis. At the moment, the income derived from operating a wheelchair taxi is the average income earned by taxi operators when plate rentals are at their current levels. That is, wheelchair taxi operators require for economic viability, at minimum, the income that is derived from taxi operations when taxi plates rent for around \$490/week.

An adequate subsidy will be very much greater in amount than the current rental discount on the taxi-plate if ride-sharing is legalised – how much more is hard to say. However, if business conditions become so grim that operators are barely covering running costs – which appears to be the probable outcome, given Uber's current pricing (50% of the cost of a taxi) – then no one is going to invest in a wheelchair taxi merely to earn \$470/week in subsidy (especially given that the rules may change again next week).

With the current glut of supply, legalisation of ride-sharing can be expected to decimate returns to taxi operators across the board. Wheelchair taxi operators were never commercially competitive to begin with, but were reliant on heavy subsidies – the impact on this segment of the industry will be differentially extreme.

The returns to taxi driving are already very low, and it is certain they will get worse if taxi drivers have to compete with people driving for Uber – an employment of convenience, to which an understandably low rate of return is both the expectation and the rule. The competitive pressures brought to bear on the taxi industry by ride-sharing services will be of such magnitude that we can be confident that any legalisation of ride-sharing services will have a dramatic knock-on effect on the provision of wheelchair taxi services.

The situation really is very serious. It is not unlikely that a restructuring of the point-to-point transport industry in NSW will result in some unintended consequences. While industry participants and most consumers of industry services have some flexibility to adjust to

changes in the shape of the industry, people consuming wheelchair taxi services have no such ability to adjust – they are critically dependent on these services being available without interruption.

My hope in writing is that the Government will not pander to the self interest of an able-bodied majority by legalising ride-sharing without also ensuring that high-quality point-to-point transport services remain available to the disabled community.

Wheelchair Taxi Operator

October 12th, 2015

Andrew Constance
Minister for Transport and Infrastructure
GPO Box 5341
Sydney, NSW 2001

Dear Mr. Constance,

I write to express my concern in regard to the potential impact of any regulatory changes that you may choose to adopt following the recommendations of the Point to Point Transport Taskforce, which I understand are due to be received shortly.

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The dynamics driving the provision of wheelchair taxi services are complex, but I will attempt to keep my advice brief.

Executive Summary

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In the event that the NSW Government does embrace ride-sharing in any form, we can expect a further decline in the business environment due to competitive pressures. In this situation, a new and expanded wheelchair taxi subsidy will be needed to support the industry.

Disabled people, who are wheelchair dependent, do not have any alternatives to the wheelchair taxi service because there are, currently, no other providers of these services. It is very likely that, in the absence of a new and material subsidy, the wheelchair taxi fleet will rapidly shrink, leading to a critical shortage in the supply of transport services to the disabled community.

I respectfully request that, when considering potential changes to the industry structure, you do not forget the social benefits that attach to the inclusion of disabled people within the fabric of society.

Background

The provision of wheelchair taxi services relies on a buoyant demand for regular taxi work, which, in effect, subsidises the provision of wheelchair taxi services.

In this document, I have used the rental prices for ordinary unrestricted Sydney taxi plates as a proxy for the business environment faced by wheelchair taxi operators. The market price for renting an unrestricted Sydney taxi plate reflects the strength of the business environment for the taxi industry in general.

When demand for taxi services is buoyant, the rental prices of unrestricted Sydney taxi plates are also buoyant. This is where the wheelchair taxi operator enjoys an advantage by way of the differential between the cost of renting a wheelchair taxi plate and the cost of renting an ordinary, unrestricted Sydney taxi plate.

This advantage or subsidy is essential to the wheelchair taxi operator's profitability and economic viability. The reason that the subsidy is essential is because the costs of commissioning and operating a wheelchair taxi greatly exceed those that attach to operating a regular taxi in Sydney. I have provided more details on the cost differences below.

We can see immediately that the current subsidy model provides for a variable rate of subsidy. The taxi-plate rental price floats, being determined in the free market, and is currently around \$490/week, although the price has been falling precipitously and is set to fall further on the back of competitive pressures in the industry (see below). The price of a wheelchair accessible taxi plate is fixed at a nominal \$20/week.

The current amount of subsidy to wheelchair taxi operators is in the range of \$470/week. The amount of the subsidy is not fixed, but floats as the differential between the rental rates for unrestricted taxi plates and wheelchair taxi plates. The subsidy has been contracting as unrestricted Sydney taxi-plate rental prices have been falling – down by a further \$35/week in the last month alone. We can expect that the subsidy will decline further going forward, even if no changes are made to the structure of the taxi industry in Sydney.

Buoyant demand for ordinary taxi services results in an increase in supply of wheelchair taxis as operators are lured by the potential returns made available by the business environment. Another way of phrasing this would be to say that wheelchair taxi operators are lured to the market by an expanded subsidy. On the other hand, slack demand for taxi services can be expected to lead to a long-run contraction in the supply of wheelchair accessible taxi services as operators leave the industry due to poor investment returns and difficult business conditions.

This is where the floating nature of the wheelchair taxi subsidy can have unintended effects. During robust business conditions, wheelchair taxi operators will rapidly enter the industry, adding greatly to the supply of wheelchair accessible taxis. However, in a tough business environment, we can expect that wheelchair taxi services will be differentially affected by way of inferior cost competitiveness versus the operation of alternative taxi transport vehicles. In this event, like a canary in a mine, we can expect that business failures in the taxi industry will emerge first amongst the operators of the wheelchair taxi fleet.

If we haven't seen significant numbers of wheelchair taxi operators exit the industry yet, it is only because heavily invested wheelchair taxi operators are eating losses or suffering poor returns to operations in the hope that business conditions will improve.

The NSW Government's response to the recommendations of the Point to Point Transport Taskforce may well be the catalyst that is needed for many, marginally profitable wheelchair taxi operators to exit the industry. In the current business climate, the number of wheelchair taxi operators barely making ends meet is large.

The long-term viability of the wheelchair taxi industry and the viability of the stakeholders within it will depend on the policy adopted by the Government in response to the Point to Point Transport Taskforce's findings.

Current Situation – a perfect storm

As discussed, above, wheelchair taxi operators depend on a robust business environment for the regular taxi industry to provide the economic incentive for their provision of wheelchair taxi services to the disabled community. However, there is already a glut of taxis in Sydney due to a combination of events, which amount to a 'perfect storm' for the industry:

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the cost of using taxis could be reduced, supply is so robust that any increment to taxi demand on the back of consumer demand being price-elastic could be met by the existing taxi fleet without increment to current taxi numbers.

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Moreover, the recent decline in the rental prices obtained by wheelchair taxi operators when renting wheelchair taxis to drivers has resulted in a contraction in operating margins. Margins for wheelchair taxi operators have contracted to levels that are described by many wheelchair taxi operators as the worst business conditions they have ever seen.

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The current subsidy, around \$470/week, indicates that the cost of providing wheelchair taxi services is large. However, a subsidy of this magnitude is necessary.

As with regular taxi demand, a large component of wheelchair taxi demand is instantaneous. That is, the booking is not made in advance, but is phoned-in for immediate execution. Without a large number of wheelchair taxis in operation, wait-times for taxis for disabled people would increase significantly and many jobs would remain uncovered.

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If the current subsidy were to be replaced with an explicit subsidy that was identifiable on a per-trip basis, then these benefits might not be obtained.

The current subsidy structure works well, though the level of subsidy is now inadequate due to the increase in competition within the industry. In the event that the industry is radically reformed to accommodate ride-sharing, the subsidy, as it operates now, will all but cease to exist. In this event, without the direct assistance of the Government, the wheelchair taxi fleet will, in large measure, cease to exist altogether.

Cost drivers for wheelchair taxi operators

Wheelchair taxis are significantly more expensive to commission than an ordinary taxi.

A taxi operator commissioning a Ford sedan as a taxi faces a lower acquisition cost because a car can be obtained second-hand for something like \$12,000. I'll assume this is already fitted to run on LPG. After fit-out costs, the operator has his/her vehicle on the road.

The wheelchair taxi operator faces a \$40,000 conversion cost. A newer or new car is more economical to convert because the cost of the conversion will be absorbed over a longer time-frame. The cost of the converted taxi (mine) was \$78,000 before fit out – more than 6 times as much as a normal taxi using this example.

Wheelchair taxis are significantly more expensive to operate.

The wheelchair conversion adds weight to the vehicle, which impacts fuel usage and running repairs. My Toyota Tarago can easily use upwards of \$75/day in fuel (Tarago's don't like LPG, which can halve the life-span of the motor). In comparison, a hybrid Toyota Camry or a taxi running LPG, for the same mileage, might use somewhere in the order of \$35-\$40 of fuel.

A wheelchair accessible Tarago will, in this example, be up to \$280/week more expensive to fuel-up for a week of operations on a single-shift basis.

Wheelchair taxis are significantly more expensive to maintain and repair. The added weight of the wheelchair conversion puts additional stress on the motor, drive train, and running gear of the vehicle, shortening the lifespan of these components. Moreover, the cars are heavier on tires than ordinary sedans. The more expensive car is more expensive to insure and attracts more stamp duty.

However, the greatest part of the operating costs comes in the later years of the vehicle's life when, though high in mileage, the vehicle is kept on the road because of the cost of the sunk investment in the wheelchair conversion. After 10 years, there is almost nothing on a Tarago that will not have been, at some point, replaced – even door handles and seat slides give way under long-term usage. While parts are expensive, it is the cost of qualified labour required to fix an ever increasing number of issues that eats into the profitability of these cabs.

There really is no comparison. Wheelchair accessible taxis are very much more expensive to commission and much more expensive to operate than a normal taxi. Moreover, while the wheelchair taxi operator may get some maxi work to help offset some of the incremental fuel costs, he/she loses out on street hails – with most customers preferring to hail a regular sedan rather than a maxi taxi.

So, for no real added advantage, the wheelchair taxi operator suffers a very much greater cost of operations than an ordinary taxi operator.

Wheelchair work

Wheelchair work is typically made up of a lot of very short fares. This is because many disabled people are completely reliant on wheelchair taxis for all their transport needs – to get to the chemist, the doctor, the shop, or to go out. In this respect, the wheelchair passenger is similar in many ways to the average DVA client, who is typically elderly, without a licence, and relies on taxis for all his/her transport needs.

Because of the instantaneous nature of much of the wheelchair taxi work and the relatively thin supply of wheelchair accessible vehicles, there are occasions where I have travelled large distances to complete what are very low dollar-value jobs. On one occasion, I was sent from the Hornsby taxi rank to Brookvale to complete a \$15 job. This, while relatively infrequent, does happen

The chap in Leumeah, who wants a taxi home from the club late at night – it takes me 20 minutes to get to him using the expressway (at my expense) and I take \$12.40 on the meter. . I'm obligated to service the needs of these clients as a condition of my taxi-plate, but it costs me time and money to complete these jobs, I do not make anything from them.

Because of the limited number of wheelchair taxis, the distance travelled, and time taken, to reach a wheelchair customer is generally much greater than the average for normal taxi work. This is simply because there is a far greater preponderance of normal taxis.

Wheelchair work is rarely lucrative, it is a service provided by someone with a desire to assist disabled people who is given a sufficient subsidy to make the provision of that assistance economically viable. Left to the free market, it is not work that we can expect would quickly lure economic agents in pursuit of profits to be made.

It is work that requires training, commitment and a willingness to look past the dollars that might be earned elsewhere in order to look after someone who is genuinely reliant on your services. .

For the above reasons, most wheelchair taxi work is not work that would ordinarily be sought after by taxi drivers, or anyone else who enjoys the luxury of being able to cherry-pick their preferred jobs.

I note that Uber did run a wheelchair accessible vehicle trial sometime last year. I'm not surprised that I have not heard anything about the trial since. I presume that it flopped.

Conclusion

With respect to the provision of transport services to disabled people, legalisation of ride-sharing services is not something that should be contemplated in the absence of dramatic increases in subsidies to wheelchair taxi operators. Material increases in subsidies will be required to counter the negative impact of ride-sharing upon wheelchair taxi services and, critically, the availability of those services.

If we see a reform similar to that proposed for the ACT, where taxi licenses are projected to fall to \$5,000/year, or around \$100/week, then the implicit subsidy to wheelchair taxi operators in Sydney would fall to as little as \$80 per week under the current subsidy system. However, the industry is struggling at the moment with a \$470/week implicit subsidy.

It is inconceivable that wheelchair taxi operators would remain economically viable in this event. A dramatic contraction in the wheelchair accessible taxi fleet will occur very rapidly, quickly reducing service levels to the disabled community.

The \$470/week subsidy is the baseline for any subsidy that would surrogate for the current discount on the taxi-plate rental for wheelchair accessible taxis. At the moment, the income derived from operating a wheelchair taxi is the average income earned by taxi operators when plate rentals are at their current levels. That is, wheelchair taxi operators require for economic viability, at minimum, the income that is derived from taxi operations when taxi plates rent for around \$490/week.

An adequate subsidy will be very much greater in amount than the current rental discount on the taxi-plate if ride-sharing is legalised – how much more is hard to say. However, if business conditions become so grim that operators are barely covering running costs – which appears to be the probable outcome, given Uber's current pricing (50% of the cost of a taxi) – then no one is going to invest in a wheelchair taxi merely to earn \$470/week in subsidy (especially given that the rules may change again next week).

With the current glut of supply, legalisation of ride-sharing can be expected to decimate returns to taxi operators across the board. Wheelchair taxi operators were never commercially competitive to begin with, but were reliant on heavy subsidies – the impact on this segment of the industry will be differentially extreme.

The returns to taxi driving are already very low, and it is certain they will get worse if taxi drivers have to compete with people driving for Uber – an employment of convenience, to which an understandably low rate of return is both the expectation and the rule. The competitive pressures brought to bear on the taxi industry by ride-sharing services will be of such magnitude that we can be confident that any legalisation of ride-sharing services will have a dramatic knock-on effect on the provision of wheelchair taxi services.

The situation really is very serious. It is not unlikely that a restructuring of the point-to-point transport industry in NSW will result in some unintended consequences. While industry participants and most consumers of industry services have some flexibility to adjust to

changes in the shape of the industry, people consuming wheelchair taxi services have no such ability to adjust – they are critically dependent on these services being available without interruption.

My hope in writing is that the Government will not pander to the self interest of an able-bodied majority by legalising ride-sharing without also ensuring that high-quality point-to-point transport services remain available to the disabled community.

1. What, if anything, needs to change in the point to point industry to better ensure:

Firstly the Minister must stop Uber through lawful enforcement..He must not be allowed to use the inquiry to hide from his legal obligation to protect current taxi owners and drivers who have invested their capital and lives and carried the industry in good faith.

2. How can costs and red tape for point to point transport providers be reduced?

It is my belief that greenslip insurance is more than double at \$7,000 plus than in Melbourne. Why, a good starting point surely.

3. What would create a more level playing field for point to point transport providers?

1. Buy back all issued taxi plates at fair pre-Uber plate value and re-issue plates on demand at a reasonable fixed rate.
2. Investigate insurance costs.
3. Allow all taxi operators to choose networks and Apps freely.
4. Keep IPART away from the industry. Theorists have wreaked havoc on the capital investment of what is essentially a privately funded transport industry.

4. Is there anything else you would like the taskforce to consider?

That an honest analysis is made of the taxi and hire car industries. It worries me that the industries are called in bureaucratic speak, Point to Point. Call them what they are and recognise that the NSW Government has made millions trading in and or leasing plates from taxis and hire cars over many years.

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Private company like uber offering cheaper rate now but if they become illegal then taxi will go out of market and they will have (reduced) business. Government won't be able to control pricing because they are private companies. As already they offer higher fare rates in peak hours which is more than regulated taxi fare. Uber is popular because of low fares in off peak hours. UberX charged \$200 for a trip from city to bondi on 31st december 2014. If a taxi driver does it, he has to face court.

1. What, if anything, needs to change in the point to point industry to better ensure:

Government should keep regulating the existing taxi industry and not allow ride sharing to transport customers to keep drivers and passengers safe and protected. all drivers must be accredited and complying with taxi industry and pay all expenses as other taxi drivers.

2. How can costs and red tape for point to point transport providers be reduced?

Cut the cost on the expenses passed on taxi drivers and they can pass the saving to customers

3. What would create a more level playing field for point to point transport providers?

More accredited taxi on road but not flooding of taxi as they will cause kiosk and traffic on the road.

4. Is there anything else you would like the taskforce to consider?

Taskforce must compensate all taxi operators and owners for the loss they experienced because the government did not act as quickly as should be to stop illegal drivers taking their jobs and not paying the tax that taxi owners and operators does.

1. What, if anything, needs to change in the point to point industry to better ensure:

Uber needs a big stop.. Very unfair to taxi driver.. Which are more trained, have more knowledge and so professional.. Uber is like u sitting in a dirtycar no professionalism.. Uber even charges more in peak hours.. I must say taxi is the all over win..

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1. What, if anything, needs to change in the point to point industry to better ensure:

Safety -1) install dash cam to capture evidence of any incidents; 2) have emergency button on phone app and there should be a person attending on the receiving end; 3) Uber magnetic stickers should be placed on doors when on duty and be visible to passengers from far. Customer Service - Uber drivers should go through the training and obtain taxi drivers licence as well to ensure same level of service. Transport Disadvantage - should leave that market to taxi industry.

2. How can costs and red tape for point to point transport providers be reduced?

Its already low and hardly any red tapes (Uber I mean). Should introduce some: Uber should be locally registered company and driver/passengers should be able to contact them via phone. Currently not.

Uber is able to increase or reduce fares charged at any time. Should have some guidelines and restrictions.

3. What would create a more level playing field for point to point transport providers?

- 1) Uber drivers should be limited. Maybe restricted on time based as well . i.e more drivers can be on road during Friday, Sat peak times.
- 2) Uber to pay a fee per driver, and reduce the taxi plate fee to level things up
- 3) Uber to provide regular reports to RMS to monitor above.
- 4) Uber should not be able to vary fares to what ever level whenever they want.

4. Is there anything else you would like the taskforce to consider?

Uber operation should be ordered to shut down until deal has been struck between Govt and Uber. On the other hand taxi industry is outdated and need to catch up with the modern world. i.e 1) booking system too old. 2) Credit card fee rip off. Cab charge is ripping off by applying GST on service fee calculated on the GST inclusive taxi fare. Hence instead of charging 5% which they advertise, they are actually charging 5.5%.

Dear Ms Leong,

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

The UberX drivers are generally friendlier, lots offer you free bottles of water, mints and offer generally a much better travel experience. When i take a taxi home from the airport, if the taxi doesn't have a foul odour, the driver if not on his bluetooth barely even grunt an acknowledgment of you.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

Should the government be looking at why people have engaged so quickly to Uber, rather than falling to pressure of a union and harshly blocking them? The government should also be looking at;

1. The impact of expensive Taxi licencing which are passed on to the consumer.
2. The quality of the taxi service
3. The time you wait for a taxi vs an UberX

Dear Minister ,

I am an uberX rider and a resident of Willoughby electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: It provides a much needed service in Sydney's congested infrastructure. I have used Sydney taxis since 1970 and unfortunately the bad experiences have far outwayed the good. Taxis not turning up, lack of road map skills, bad driving skills, miss use of road rules and have turned me away from using taxis. I have yet to have a bad experience with Uber.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

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I look forward to hearing from you.

There is small change that can give all drivers a pay increase without increasing the meter. All you have to do it make taxi owners collect the drivers GST. And all drives will save money not requiring accountants every 3 months and the ATO will have it easier too less people to chase or GST. I can go on and on. Just make this happn. This is win for taxi drivers and the ATO...

Dear Mr Daley,

I am an uberX rider and a resident of Maroubra electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: Uber shows up when I need a Taxi. Short rides are not a confrontation. You are a welcome passenger not a burden and response times and tracking are excellent.

Bottom line -- fix the taxi system to match what consumers want or face the backlash. History -good consumer service will prevail.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

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Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city I refuse to allow my freedom of choice taken away from me because of some ones else profits I want the FREEDOM to chose you have no right to take it away from me

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

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Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Notley-Smith,

I am an uberX rider and a resident of Coogee electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city as well as cleaner cars and better customer service!

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none. It is not uncommon for new business models and technology to disrupt an industry. This is what innovation is all about - shouldn't we be promoting this kind of thinking by businesses?!

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

To the Secretariat,

I believe I have valuable, objective and interesting input to offer to this debate. I am a supporter of Uber but I also have some concerns.

I am 52 years of age, I live in Curl Curl on the Northern Beaches in Sydney. My family and I use Uber as passengers and I am also an Uber driver. The part-time income has been a vital income supplement which has enabled our family to survive while we prepare to launch our Start-Up businesses.

I forward my opinions and perspectives separately as; a Constituent, a passenger and an Uber driver.

My opinion as a Constituent

I believe future economic prosperity for Australia relies on growth in the technology sector. I believe Australia has much work ahead to support and grow this sector. To disallow a modern business model such as Uber would be, in my opinion a concerning and backward step. I believe the government needs to embrace efficient services which are popular with voters.

As a constituent, I do have concerns about foreign companies implementing sleek and profitable business models which extract profit to the USA or other foreign countries. I would like to see Australians benefit from the revenues generated by such business models and I believe the government needs to get creative to ensure such businesses are taxed fairly and appropriately.

I am not sure if applying a (no threshold) GST to all drivers is the answer. I am a driver myself, I personally have no problem with collecting GST as a driver. I'll probably earn \$35,000 this financial year driving Uber, I'd collect \$3,500 in GST and then claim absolutely everything. This will be great for me but unfortunately will leave no benefit to the ATO, Government or voters. I believe this move will just deter many drivers who won't know how to deal with BAS, impede growth and at the same time generate futile administrative costs. I assume this ruling was a knee-jerk reaction to keep the taxi lobby at bay or some other reason but I doubt it's the answer. I believe the government has to get smarter and more creative with regard to taxation for overseas tech business models.

I am concerned for the taxi owners however the disruption represents a classic change scenario where businesses and in these situations casualties do occur. We are looking at an old and generally disliked business model vs a new and popular business model. From my experience Uber is customer focused whereas taxis seem to be all about the needs of the owners and the drivers with the customer long forgotten - this industry led with its chin to be disrupted. I believe some of the blame is with the regulatory bodies who simply could have managed taxis better and regulated them more appropriately.

I believe it would be fair for taxis to somehow be compensated, either by the government or indirectly by the new disrupting businesses (a levy or tax).

As a constituent I believe the new popular ride sharing services should be totally embraced and supported.

My opinion as a passenger

I never want my wife or children to ever hail a taxi. I get them to use Uber where a full digital trail will exist from the time the ride is booked to the time they are dropped off at their destination. They will always know how long until the ride arrives as they can follow the Uber car's approach on their Uber App. I take comfort in knowing that the driver's criminal history, driving record and personal details are all in check and that the ride will be in a clean, comfortable and safe car. I also know that the driver is likely to be a good driver (if they are not, their rating falls and they will be dismissed) and if the driver has been rude or we have any dispute about the fare, like a longer route taken Uber will quickly attend to my report and/or refund any unfair charges. This is a brilliant customer focused service.

I love using Uber as a passenger, all the drivers are concerned about their ratings, so as a result their cars are clean, they are polite and they even extend special treats like iPad use, choices of music, chocolates, mints, bottles of water, phone chargers and I have even seen comfortable cushions. My phone turns into a GPS while I am in the car so I can follow the same map to ensure the driver is following the recommended route. Uber drivers are unaware of the passengers chosen destinations until the passengers enter the vehicles, this stops Uber drivers from ever choosing selective trips. This is a clever business model resulting in great customer service

Taxis by comparison are generally dirty clapped out vehicles with rude drivers who most of the time seem to be talking to other persons on mobile phones for the duration of the trips. Often the drivers refuse to accept trips if the destinations are not to their likings. The last time I booked a taxi, the receptionist told me "first available" when I pushed her for more detail she rudely repeated 'first available' and then hung up on me. This was the last time I ever used a taxi.

Uber drivers are people who can afford a car. I have made the observation that this generally means the drivers are often more established and/or organised residents from within the community who are more likely to offer a better service than employed taxi drivers.

As an Uber Passenger, I highly recommend Uber to be embraced by the governments of Australia.

My opinion as an Uber driver

The part-time job which Uber facilitates for me has been a life saver and is my best option to supplement my income. As an Uber driver, I can log on and log off as I wish. With two children at school, two start-up projects and a wife who also works part time, the flexible working hours are to my optimum advantage.

As a driver I constantly hear feedback from the passengers. Most passengers seem

passionate and even enthusiastic to disrupt the taxi industry. Many express bad experiences they have encountered with taxis, their distaste is such that they even seem to find enjoyment in being part of the current disruption. Most passenger love the entire Uber business model and experience, there is a real positive feeling and excitement attached to the experience.

As a driver I feel comfortable that no passenger can 'do a runner.' I also have the opportunity to rate the passenger after each trip creating an even level of respect. I also have the opportunity to report unruly passengers, unruly passengers will be warned or even refused.

Sometimes Uber driving is frustrating, after deducting fuel and vehicle expenses plus vehicle wear and tear, the pickings can be slim. However, if I choose my hours prudently the financial rewards are worthwhile and as Uber grows the trips come more frequently and are even becoming available deeper into the outer suburbs.

I did have an issue with Uber regarding insurance. I believed I was covered by Uber's contingency insurance plan if an accident occurred while Uber passengers were in my vehicle but I ended up having to pay \$650 from my own pocket after an accident where I was not at fault. I found Uber to be a little smug in the way they dealt with the situation leading me to disagree with the current business model that intends to gain profit while pushing most of the insurance obligations back on the struggling drivers. This is very cheeky in my book, particularly when Uber would be in a position to negotiate a better deal for the drivers through the power of numbers.

Uber seems to be very strong with all other communication to the drivers; marketing, referring new drivers, incentives, events which require more drivers etc but I haven't seen them being very forward in explaining to drivers exactly what their potential risks or insurance exposures. Uber seemed to think I should have read the small print. I am possibly more savvy than the average driver and I still got caught out. Hence I believe this is one area of business which requires some review.

As a driver, I highly recommend for Uber to be supported by government but I believe Uber's insurance obligations require review.

I hope my input is useful in some way.

1. What, if anything, needs to change in the point to point industry to better ensure:

Uber is miles better than taxis. If it wasn't it taxis wouldn't be complaining as much as they are! Taxis provide average to poor service and this day was always going to come. Taxis are to uber as Tapes were to CD's, what Encyclopedia is to the Internet, VCR is to DVD... Uber is cheaper, easier to organise, friendlier and overall a more enjoyable experience.

2. How can costs and red tape for point to point transport providers be reduced?

3. What would create a more level playing field for point to point transport providers?

4. Is there anything else you would like the taskforce to consider?

How many small businesses have fallen over the last decade due to advancements? Countless... Why does the government get to pick and choose which industries can't be replaced by better systems? We're not getting rid of the Internet to bring back the post office glory days so the taxi industry needs to keep up or close up.

1. What, if anything, needs to change in the point to point industry to better ensure:

Working seatbelts which are not twisted or jammed in the back of the rear seat of the vehicle.

I don't think passengers generally consider customer service or consumer protection as their point to point trip is limited to a generally short amount of time. I do think the needs of people with a disability are well serviced having just spent six weeks in hospital rehabilitation following a badly broken ankle.

2. How can costs and red tape for point to point transport providers be reduced?

Uber seems to manage this well. The large taxi companies are raking in more money than they should and I understand taxi drivers generally feel they have no say in this and are more or less helpless.

3. What would create a more level playing field for point to point transport providers?

Why should there be a more level playing field? What's wrong with innovative competition?

If taxis presented a better product than they (on the whole) currently have it might help. Most taxis are filthy and badly maintained.

4. Is there anything else you would like the taskforce to consider?

There are too many dirty unhygienic taxis. Unhealthy.

Taxis within the City of Sydney are not permitted to drop off and collect passengers readily. This is a major part of their service in this community and far too many fines are placed on taxis.

1. What, if anything, needs to change in the point to point industry to better ensure:

As a customer I feel having access to a smartphone app to identify myself and make payment is a much easier way to be delivered good customer service by the Point to Point transport provider. Using clunky old ways of Payment such as Cabcharge (which includes an annoying surcharge that discourages using Taxis for myself) is so outdated.

2. How can costs and red tape for point to point transport providers be reduced?

Lower overheads for Taxi Drivers, lower radio network access fees - change the bailment fee to introduce an hourly rate or charge the bailment based on a percentage of takings, which would encourage the drivers to provide better customer service and try and attract new or regular business. Hopefully reducing the costs and making it simpler to get business would attract new Quality drivers.

3. What would create a more level playing field for point to point transport providers?

Rideshare - Can only be booked through accredited apps, to request a vehicle to arrive within 10 minutes of booking (maybe 15-20 minutes in outlying areas). Driver must hold a Public Passenger Authority. Not able to Book at Airport or Major Railway Stations.

Taxi - Can be booked an unlimited amount of time in advance either through an accredited app or accredited taxi provider. Can also work from Ranks, or be hailed in the street.

4. Is there anything else you would like the taskforce to consider?

Introduce Urban(CBD), Suburban (can't pick up in CBD), and Outer Suburban Area Taxi Licences to encourage Taxi Drivers to service and operate in outlying areas instead of all converging on the CBD. Lower Fares could be offered by Non CBD Taxis, which would encourage more business.

1. What, if anything, needs to change in the point to point industry to better ensure:

The taxi service at Newcastle Airport needs to be improved so that taxi services other than Newcastle Taxis are allowed to use the airport. Currently Newcastle Taxis are the only operators allowed to accept fares from the Airport.

2. How can costs and red tape for point to point transport providers be reduced?

This restriction means that airport patrons from other areas, such as Nelson Bay or Maitland are charged for both out and return journeys if using taxis. That is, they are charged for the empty return journey if using a local taxi operator, as the operator is not allowed to pick-up a fare at the airport.

3. What would create a more level playing field for point to point transport providers?

Allowing taxi services other than Newcastle Taxis to use Newcastle Airport would create a more level playing field for local taxi providers and customers. Removal of this restriction would allow other taxi operators to accept fares at the airport that could greatly reduce the cost of taxis for patrons from areas other than Newcastle.

4. Is there anything else you would like the taskforce to consider?

1. What, if anything, needs to change in the point to point industry to better ensure:

Good customer service and consumer protection&driver&passengers safety

2. How can costs and red tape for point to point transport providers be reduced?

Cost of insurance is high & other expenses

3. What would create a more level playing field for point to point transport providers?

It is hard to make living as it is too many cab on the road ,we start a cab 3am fist job come 5am ,it is a long waiting these days to make money customer never satisfy if you give taxi to each home driveway still not happy ,they want free ride to make them happy ,Australian gov & public care about refuge & disadvantage people ,but don,t believe our live is as bad as theirs.

4. Is there anything else you would like the taskforce to consider?

20 years ago n s w gov sold taxi plate over 200,000. people with good heart trusted gov and invested in this way for their retirement .Gov suppose to look after small businesses.

1. What, if anything, needs to change in the point to point industry to better ensure:

In rural and regional areas there is limited disability infrastructure.

2. How can costs and red tape for point to point transport providers be reduced?

There are a number of providers doing what they are contracted to do and receiving funding from different areas. There needs to be a central controlling body/company in a region to co-ordinate the different transport providers, this will ensure the best use of all the available providers.

Legislation, regulations and contracts need to reflect this.

3. What would create a more level playing field for point to point transport providers?

We can not ignore new concepts of Pint to Point eg Uber no doubt in the future drive less cars. These new forms need to comply with rules and regulation as do other providers.

4. Is there anything else you would like the taskforce to consider?

Yes. There is a couple of bus operators in NSW providing Point to Point transport. On demand timetable services. The passenger books the bus at the timetable time. The bus picks up the passenger at there door step. Shoal Bus runs this service from Berry and Shoalhaven Heads to Nowra. This service is cost effective to the passenger (pensioners \$2.50), allows for large numbers and encourages a community caring group. It also frees up other providers to provide other times and services.

Email

To Professor Gary Sturgess

Dear Prof

I spent the month of July this year in the USA and in that time I used Uber on a regular basis. on my return to Australia I approached Uber in the interest of becoming a driver with them mostly because I was attracted to the flexibility it offered. I was pleasantly surprised at the level of scrutiny I had to go through to meet their requirements.

I am a lady in my 50's and finding work is not that ease but I do feel I still have a lot to contribute to the working community, I do not want to work at night and Uber gives me that opportunity.

Since driving with Uber I have noted positive feed back both while working and socially. The way in which the tracking and fare collection are structured is good for both driver and rider and I feel a great sense of community with the riders I pick up. I love having the flexibility to work at my own pace this means I'm not under stress while on the road.

I do understand the frustration of the Taxi Council the issue of "something new" has come up in so many work places over the passed years for example the arrival of digital technology saw many business have change and upgrade the way they conducted their workplaces, already this has shown in the Taxi Council moving to implement the technology used by Uber.

I believe there is room for us all to assist the ever growing population of our city to move around conveniently. despite unpopular reports by the Taxi Council Uber and It's drivers are warmly welcomed by the general public and should be embraced as an enterprising solution to transport and work (two key issues often in the media) as part of our future.

With Thanks

Tina Draper.

There is no such thing as ride sharing to be legal with out them payin licence fees and proper accreditaion of drivers however ride share app should be permitted with approved vehicle by taxi council NSW

And accredited driver who pass all safety procedure and pay all fees

If ride sharing continue to be allowed then allow every street food seller to sell good in front of approved restaurant at cheaper price

It is failure of regulatory authorities too if they fail to stop ride sharing for reason known to them please

Habib

Dear sir/madam

As a proud resident of Australia and dedicated voter, I implore you to take a moment to think about these illegal rideshare apps and the negative impact that it will create against hardworking drivers and their families, like myself.

Daniel R

Hi

I am writing this letter in support of Uber coming to Newcastle.

The reason I support Uber is that I am sick of trying to get taxis in Newcastle on Friday and Saturday nights. My husband and I often choose not to go into town now as it is too hard to get home.

The taxi service has an online booking service but refuse to use it on these nights, they just ignore your booking and don't turn up.

We are in our 40's and love the fact that the city has so many new bars and restaurants and would love to use them more often.

I look forward to hearing from you.

Kris Downing

My name, John Indra

Active owner operator since 1984.

Active Members of: Taxi Industry Association since 1984.

My opinion to fix or to repair the taxi industry in NSW.

- 1). One network control by RMS.
- 2). Taxi plates must control by RMS not brokers or networks or Ipart .
- 3). Taxi plate for disability must control by RMS not the network. And taxi plate for disability must pickup the disability Job and do the school run only.
- 4). Ipart only can do the taxi fare rate.
- 5). Contract determination 1984 must change.

I m happy to help for taxi industry and for the benefit for the customers and good for the government . Sorry with my spelling and my sentence.

Submission to : Point to Point Transport Taskforce 8 October 2015

Firstly, please accept my apology for the timing of this submission, which is being made on the premise of the statement made in the NSW Government Point to Point Transport Taskforce Fact Sheet, namely, "The taskforce will consider submissions received after the published deadline at its discretion." Accordingly, I respectfully request that the submission be accepted.

This submission speaks to the increasing presence of UberX (and like operations) in recent months, and how that affects - in a substantial, material manner - current Sydney taxi plate owners and / or drivers.

Firstly, as many submissions will have already raised the numerous and valid concerns accompanying this topic, I do not intend to address these matters which include but are not limited to passenger safety, customer service, lawful / unlawful operations, services for those with a disability, GST, technological change, Australian taxation matters regarding UberX (the parent enterprise), insurance, vehicle tracking, driver training & accreditation, police checks, vehicle checks, and not least, even the requirement for taxis to have an automatic boot-release. It is acknowledged that these and other related issues will be fully explored and have recommendations made by the Taskforce.

Rather, in particular, I wish to address Key Questions 3 and 4 on the first page of the (above) Fact Sheet :

- What would create a more level playing field for point to point transport providers?
- Is there anything else you would like the taskforce to consider?

In 1988 at the age of 56, my late father purchased a Hire Car plate which he worked himself. When considering purchase of the plate he also very definitely viewed it as being a source of income for his and my mother's retirement. As you would be aware, some years later the NSW Government deregulated the hire car industry, which caused much concern to many owners regarding the value of their plates. I believe that for an extended period following the deregulation, there was some loss of income for plate owners. Over a couple of years post-deregulation, along with some other plate owners, and after rigorous negotiation - including not a little angst - my father was granted by the NSW Government, 61.3% ownership of a taxi plate as compensation for his capital outlay in purchase of the hire car plate.

The taxi plate is currently leased, income from which is used by my 80 year old mother; she also receives a part-pension. Over the last year to date, the income has dropped by some \$70.00 per week.

UberX drivers, who simply use a regular NSW registration plate do not pay even a fraction of the cost of a NSW Government-leased hire car or taxi plate, let alone a payment even beginning to approach the amount of money which has been spent by those who have purchased a plate.

When compared with UberX - quite apart from the extra expenditure resulting from issues and concerns mentioned in paragraph three above - taxi plate owners have the additional loss of decreasing plate values. According to published NSW Transport figures, by far the largest decrease in plate value has occurred during the last nine months. At the end of 2014 the average price for a taxi plate was \$374,401; at the end of September 2015, the average price was \$311,734, a loss of almost \$63,000. Given the emergence of UberX within the last year or less, it is certainly remarkable that this loss has occurred in the last nine months.

Needless to say, the current discussion around UberX and the taxi industry distinctly highlights the existence of an extremely unlevel playing field.

I think it is safe to allege that my father was not alone in this thinking when he purchased the hire car plate in order that he and my mother might provide income for themselves in retirement, and consequently, be less of a burden on public funds.

In your undertakings, please give due and serious consideration to potential effects on the livelihood of the many people, who have worked to raise capital to purchase a taxi plate (some at a cost in excess of \$420,000), in order to provide an income, but who now find that that purchase has the potential to be devalued to the extent of being rendered quite worthless. It is certainly hoped this will not occur.

In drawing conclusions regarding the creation of a level playing field for point to point transport, I implore you to include recommendations to the NSW Government as to how it will address - in a conscionable, fair and just manner - compensation to taxi plate owners who have already borne extensive capital loss, and who now stand to bear further capital loss - as well as income.

The shared economy may well be here to stay, but the new players in the game certainly should not jeopardise - in any way - the position of those already on the field, and who have been playing faithfully by the rules for a very long time.

Thank you very much for reading this submission.
Yours sincerely,

Debbie

Gentlemen

We have been directed to your task force by our Local Member, Mr. Ray Williams MP to make a submission in opposition to the continuation of the Uber X ride sharing system illegally operating in NSW.

We have two "limited life" taxi licences which were exchanged for two hire car licences purchased in 1986. These were operated through a co-operative network, allowing us a modest life style. The intention was to use them as a major part of our self funded superannuation scheme.

Prior to the 2000 Olympic Games the Government decided to auction off HC licences. The maximum paid was in the vicinity of \$160,000.00

In 2002 the Government then decided to lease HC licences for half the current market value instantly halving the equity in the licence causing much anguish and consternation amongst existing licence holders.

In 2003, Mr Michael Koster MP, then made a one time offer to those of us in this situation to exchange a HC licence for a Taxi licence with a life of 50 years. For many of us this was a satisfactory arrangement as it safeguarded our long term financial security against receiving welfare.

This system has continued satisfactorily until the appearance of the illegal Uber X ride sharing.

The monthly income from our two taxi licences has reduced by over 16% since the appearance of Uber X and the value of the asset by a similar amount.

If this continues without control or regulation then those of us in similar situation will continue to have years of hard work completely eroded and have our financial security thrown into doubt. The gloomy prospect of having to go cap in hand to Centerlink to supplement our living expenses after a lifetime of saving and investment to avoid this very situation, is depressing.

There is a simple solution to this problem. The establishment of a level playing field through effective regulation and compliance. The taxi and Hire car industry is well placed to compete in the point to point transport market as long as they don't have to operate with their hands tied behind their backs.

Further, if the NSW Government wishes to change the regulatory framework in creating a new competitive environment, and these changes have a negative impact on the NSW Taxi industry, particularly on those of us who have invested much of our livelihood into this industry, then some form of compensation must be put on the table.

Please accept this submission from a couple who have lived their lives complying with the laws of the land and very naive regarding directions to be taken to ensure

that a fare and just result be achieved. We are distressed that circumstances beyond our control, and which directly impact on our remaining lives are causing us such distress.

Yours sincerely

Jan and John Edwards

Submission on Point to Point Transport Taskforce Discussion Paper

September 2015

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Contents

1	Introduction	1
2	Context	1
3	Safety and security	7
4	Consumer protection	11
5	Quality of services	14
6	Regulation of supply of services	14
7	Compliance and enforcement	16

1 Introduction

Thank you for the opportunity to comment on the Point to Point Transport Taskforce's Discussion Paper. We support a thorough review of the regulatory framework for point to point transport.

IPART has recommended taxi fares to the Government each year since 2001 and has recommended the number of new annual Sydney taxi licences to be released each year since 2012. We also undertook a review of the taxi and hire car industries in 1999.¹ Through our work, particularly recently, we have become aware of the rapid pace of change in the point to point transport industry, much of which has been to the benefit of consumers and has delivered on the aims of regulatory changes made over the last two decades.

However, the pace of change in society, the point to point industry and in available technology, has outstripped a regulatory framework that was first established when taxi cabs were pulled by horses. We consider it timely to review the regulatory framework from a 'first principles' approach, considering the appropriate objectives for the regulation of point to point transport and then the best measures to achieve those objectives.

This submission sets out our views and recommendations on the issues and discussion points posed in the Discussion Paper, where we have the expertise, experience and information to respond.

2 Context

We concur with the Discussion Paper's assessment of the changes in society and technology that are driving the need for regulatory change in point to point transport. Over the period that we have been reviewing the number of new annual taxi licences to issue each year, we have observed the entry of commercial ride-sharing in Sydney and its impact on demand for taxis.² We were also told of the impact on demand for taxis by courtesy transport provided by licensed venues, particularly in areas outside Sydney.³

Some of the issues are not new, however. Successive governments in NSW and elsewhere have wrestled for many years with the problems created by regulating the supply of taxi licences. High taxi licence prices indicate an under-supply of taxis relative to demand and put a cost burden on those entering the industry, but incumbent owners of high value licences understandably do not want to see a drop in the value of their licences.

¹ IPART, *Review of the Taxi Cab and Hire Car Industries – Final Report*, November 1999.

² IPART, *Sydney taxi fares to apply and new licences to be released from July 2015 – Final Report*, February 2015, pp 2-3.

³ IPART, *Review of taxi fares outside Sydney to apply from July 2015 – Final Report*, June 2015, pp 59-60.

Overly prescriptive regulation has also burdened the taxi industry and to a lesser extent the hire car industry with high compliance costs (ultimately paid for by consumers through higher fares) and stifled innovation. Excessive regulation has also served as a barrier to entry to the point to point transport industry and thereby restricted competition, which can work to the advantage of incumbents, although not consumers. In our view, a 'level playing field' of regulation should not involve applying existing regulations to new entrants such as commercial ridesharing. Rather, a level playing field should mean a simplified regulatory framework that applies to all participants, lowers barriers to entry and allows the market to better match supply of and demand for point to point transport services including taxis, hire cars and ridesharing.

The Licensing Framework developed as part of IPART's *Reforming Licensing in NSW Review* sets out a conceptual framework and guide to its application to assist in improving licence design and administration.⁴

Recommendation

- 1 That the taskforce apply the IPART Licensing Framework and Guide to assist in developing an optimal regulatory framework for point to point transport.

Discussion point 1: The taskforce seeks comment on what steps could be taken to make taxi drivers' incomes more sustainable.

Through our previous reviews,⁵ we have found that driver earnings are independent of taxi fares. Drivers' earnings consist of fare revenue less drivers' costs and the largest driver cost, the pay-in, is likely to move in the same direction as fare revenue, leaving the driver with the same level of earnings. Drivers' earnings are effectively negotiated between drivers and operators, and are determined by the supply of and demand for drivers.

The contractual relationship between bailee drivers and operators in Sydney is regulated by the NSW Industrial Relations Commission, which sets maximum pay-ins for each shift. However, in practice, market pay-in rates are below the maximum pay-in rates for all shifts. This means that the pay-in a driver actually makes to an operator is determined by agreement between the driver and operator.

⁴ PricewaterhouseCoopers, *A best practice approach to designing and reviewing licensing schemes*, May 2014 and PricewaterhouseCoopers, *A best practice approach to designing and reviewing licensing schemes – Guidance material*, May 2014.

⁵ See for example IPART, *Review of maximum taxi fares and review of annual Sydney taxi licences from July 2014 – Final Report*, February 2014, pp 21-24.

The relative bargaining position of drivers and operators in the negotiation is determined by the demand for drivers, relative to the supply of drivers. If there are not many taxis, and a lot of drivers who want to drive taxis, operators are more likely to charge a higher pay-in, and so drivers would take home less of the total fare revenue. Keeping the supply of taxis (and therefore the demand for drivers) fixed, together with a growing number of drivers, suppresses driver earnings.

On the other hand, increasing the number of taxis – or close substitutes such as hire cars or commercial rideshare – and therefore the demand for drivers would tend to improve the bargaining position of drivers. Operators might have to reduce their pay-ins in order to get drivers for their taxis, as drivers are better able to ‘shop around’ for the best pay-in deal. This would mean that the take-home earnings for drivers would be higher.

We consider that an updated and streamlined regulatory framework that removes barriers to entry to the point to point transport market is likely to increase the demand for drivers and improve their incomes.

Discussion point 2: Given the inconsistent application of network authorisation requirements across NSW, the taskforce seeks comment on whether the requirement for a network to be authorised is necessary at all, let alone meet complex application requirements before being able to operate, particularly in regional areas.

The need for, and the nature of, authorisation for taxi networks is dependent on the legislative responsibilities of those networks, which is one of the issues being examined by the Taskforce.

IPART supports removing the requirement for authorisation in regional areas (ie, areas covered by the country fare schedule). Under the current regulatory framework, there would appear to be few identifiable benefits of taxi network authorisation and mandatory operator affiliation in regional areas.

Recommendation

- 2 That the regulatory framework for point to point transport should not require network authorisation in regional areas.

In Sydney and other metropolitan transport districts (ie, the areas covered by the current urban fare schedule), the current situation is more complex, as over time networks have assumed a co-regulatory compliance and enforcement role where potentially authorisation and the conditions associated with it serve safety, security and quality outcomes. However, the highly prescriptive and complex application requirements are unlikely to have produced any benefits for consumers, have added costs and have served as a barrier to entry of new networks. If authorisation is to be retained in metropolitan transport districts

under the regulatory framework, the conditions of authorisation should relate to operational requirements rather than to application requirements.

Recommendation

- 3 If networks continue to be accountable for safety and security arrangements in taxis, they should continue to require authorisation. However, the **application** requirements should be minimal and any conditions of authorisation should relate to **operating** requirements.

A more fundamental review of the regulatory framework may obviate the need for network authorisation entirely. Taxi network operations and responsibilities are perhaps a good example of a situation where regulation may have been necessary when effective competition was absent, but with the emergence of competition, there is less need for regulation, including authorisation of networks and mandatory affiliation of operators with networks.

A simpler, outcome-focused regime with clear accountabilities could replace network authorisation and mandatory operator affiliation. In its recent Green Paper on on-demand transport,⁶ the WA Government proposes a system of accountability that focuses on the dispatcher of a service (ie, the booking service), the licensee, the vehicle owner and the driver. The NSW Point to Point Transport Taskforce Discussion Paper similarly on page 17 discusses the distinction between booked and non-booked point to point transport services. We note that, on its commencement, Part 5 of the *Passenger Transport Act 2014* will introduce regulatory changes to network services by separating the functions of taxi networks and booking (or dispatching) services in NSW.⁷

The separation of functions should enhance competition in the market for network services as well as booking services, and consequently reduce network fees. However, the uptake of booking services provided by entities other than taxi networks, and any associated benefits such as cost savings, may be limited if operators are not able to restructure their network affiliation to only include network services. That is, in practice operators may feel obliged to retain (and pay for) the booking services offered by the network and use a competitor's booking service in addition to, rather than instead of, the network's booking service.

Removing mandatory network affiliation would be an alternative way of encouraging greater competition in network services. Competition will drive innovation and cost efficiencies. We note that it is no longer mandatory for taxi operators in Victoria to be affiliated with a network, and instead taxi operators are responsible for ensuring that security and safety outcomes are met – which can be done through a network or other means. In such a framework, where the

⁶ Government of Western Australia, *On-demand Transport: A discussion paper for future innovation*, 2015, p 36.

⁷ While the *Passenger Transport Act 2014* received assent in September 2014, not all parts have commenced.

responsibility lies with the operator, network authorisation would not be required. However, the regulator may require additional powers to monitor and enforce safety and security arrangements made by the operator, so consumers can have confidence in rank and hail services.

Recommendation

- 4 The taskforce should develop from first principles a regulatory framework for point to point transport which:
 - is outcome-focused and risk-based
 - regulates similar services uniformly and differentiates in regulation only where there are significant differences in operation risks (eg, by distinguishing between booked and unbooked services)
 - assigns clear accountabilities with tools to monitor and enforce them where necessary (eg, authorisation and accreditation)
 - which addresses safety, security and consumer protection
 - promotes competition
 - does not create barriers to entry.

Recommendation

- 5 That the regulatory framework for point to point transport should not require mandatory network affiliation for taxi operators.

Discussion point 3: The taskforce is interested in views around alternatives to the universal service obligation on the taxi industry which could improve access to services for customers.

Could alternative approaches meet the objectives of universal service in a more effective way?

In our view, the development of a simpler and more consistent regulatory framework should improve the supply, extent and flexibility of point to point transport services, improving coverage and affordability.

More services would be included in the definition of a booked service (ie, an 'e-hail' using a smartphone for immediate pick-up from a street location is a booked service), and more flexible service provision (eg, by part-time commercial ride-share drivers) would provide a better match of supply and demand. However, this could also serve to shrink the market for traditional rank and hail business and may exacerbate access problems for some: elderly, disabled or low income people, who are also less likely to have access to smartphones for the full range of booking options. Even under current regulatory arrangements, some of this demand is met by community transport, which we would expect to continue to play a role in providing transport to this group.

Recommendation

- 6 That the universal service obligation should be removed and the market should be able to determine hours and areas of operation, and match supply to demand. However, the availability of point to point transport services should be monitored to assess whether all segments of the market are being adequately served. We note that Government-subsidised community transport services would continue to be required to address the needs of the elderly, disabled or low income people.

Discussion point 4: The taskforce invites comment on current government initiatives to encourage the availability of wheelchair-accessible vehicles.

How could these be more effective?

Initiatives such as the centralised booking service, lift fee, and lower cost licences appear to provide a level of service for wheelchair-using passengers in NSW that compares well to services available in other states, although we note that WAT network KPIs for Sydney, Newcastle and Wollongong still do not deliver at the same level as standard taxi services,⁸ as required by Commonwealth Disability Standards.

However, under a revised regulatory framework, the taskforce will have to consider whether these initiatives will continue to suffice, for the same reasons as outlined in the response to Discussion point 3: greater availability and flexibility of booked conventional services will provide better services for many, but may exacerbate the disadvantage of some.

Discussion point 5: Should ridesharing services be regulated? If so, how? Is there any need to distinguish them from other booked services?

The taskforce seeks comment as to how the regulatory framework could be simplified so that point to point transport providers have more flexibility about how they provide services. Should there be fewer restrictions as to how they operate?

We consider that there should be fewer distinctions between modes of point to point transport, allowing for competition that can achieve better outcomes for passengers than regulation in many cases. We consider that the objectives of a regulatory framework should be:

- ▼ All competitors should be subject to appropriate regulation for safety of passengers and drivers and for the protection of consumers. We consider that regulation should cover areas such as driver authorisation, vehicle operation, records of journeys, and accountability for services.

⁸ Data available from Transport for NSW on request. The most recent data IPART reported on is contained in IPART, *Review of maximum taxi fares and review of annual Sydney taxi licences from July 2014 – Final Report*, February 2014, Appendix E.

- ▼ Regulatory requirements should generally be the same across modes and across areas – with exceptions for significant differences in risk to passenger or driver safety or consumer protection. The distinction between booked and non-booked services seems to be one such sensible distinction.

Recommendation

- 7 That all point to point transport, including commercial ridesharing, should be subject to the regulatory framework as set out in Recommendation 4.

While a level regulatory playing field is an appropriate objective, it should not be achieved by increasing the regulatory burden on new entrants or existing competitors. We consider that the taxi industry (and to a lesser extent the hire car industry) is burdened with higher costs compared to other modes of transport due to inappropriate or outdated regulatory obligations.

Some existing regulations are anti-competitive and should be removed. For example, the *Passenger Transport Regulation 2007* was recently amended to prohibit country hire cars from taking bookings less than 30 minutes from the pick-up time.⁹ This amendment acts to limit competition with taxis for no identified benefit to customers. Regulations of this nature are anti-competitive and should be removed, notwithstanding that this amendment was just introduced.

Reform of regulatory requirements could reduce costs and enhance efficiencies in the provision of point to point transport services, without compromising safety or quality of services. For example:

- ▼ Restrictions, whether legislative or price-based, on the supply of licences should be removed.
- ▼ Overly-prescriptive regulations should be removed when an outcome-based requirement could encourage innovation and achieve the same result flexibly and at lower cost.

These issues are dealt with in more detail under specific discussion points below.

3 Safety and security

We agree that safety and security of customers and drivers is a key consideration and focus for regulatory requirements on point to point transport.

⁹ Transport for NSW media release, *New hire car regulations to apply in country NSW*, 26 August 2015, accessed at <http://www.transport.nsw.gov.au/media-releases/new-hire-car-regulations-apply-country-nsw>

Discussion point 6: The above rules [regarding driver licensing] are applied differently to different types of point to point transport drivers. How could these requirements be better applied?

If it is considered appropriate for professional drivers to apply for an additional demerit point, then all professional drivers including commercial rideshare drivers should be permitted to do so, based on the current threshold definitions of 'primary work' and number of hours per week spent driving.

We note, per footnote 44 on page 22 of the Discussion Paper, that taxi and hire car drivers are permitted to use bus lanes, and to stop in clearways and some designated No Stopping zones, but that the taskforce does not propose to consider these provisions as part of the review. Nevertheless, we consider that these provisions do relate to the regulatory framework for point to point transport and should be applied either to all point to point transport or to none (or to a subset such as providers of non-booked services only).

Similarly, the lower blood alcohol content limit for bus, taxi and hire car drivers should also apply to all point to point drivers, as well as the exemptions from requirements around handling devices such as GPS units, dispatch units and mobile phones.

Recommendation

- 8 That the rules regarding demerit points, blood alcohol content, use of devices in vehicles and use of bus lanes, clearways and No Stopping zones should be applied consistently to point to point drivers based on risk.

Discussion point 7: The taskforce seeks comment on whether the Government's current safety standards for public passenger drivers are reasonable.

Also, how could the processes for enforcing these standards be improved? Are there alternatives to the current system that could work more efficiently and effectively?

As part of our *Reforming Licensing in NSW* Review, IPART identified the Taxi Driver Authority as a licence that was a 'Top 40' priority for reform, based on:

- ▼ duration (at three years, it is shorter than the optimal 5-year duration we identified)
- ▼ conditions not set using best practice
- ▼ licence not reviewed during previous five years
- ▼ fees not set on a cost-recovery basis, and

- ▼ the compliance burden being potentially excessive.¹⁰

Recommendations

- 9 That the current conditions of driver authorisation should be reviewed for their effectiveness at ensuring minimum standards of safety and security. Fees should be set on a cost-recovery basis and the appropriate duration of the licence considered. There should be a mechanism for permanently removing authorisation from people who are deemed unfit to be a professional driver.
- 10 That the requirement for driver authorisation should apply uniformly to all drivers of point to point transport.
- 11 That driver authorisation should not deal with matters of driver quality; additional standards and training requirements could be set by individual businesses as a business decision.

Our licensing review identified the compliance regime, which currently consists of blanket inspections, periodic reporting, targeted inspections and exceptions reporting, as potentially having scope to reduce burden and therefore costs, without reducing safety.

Recommendation

- 12 That the taskforce should use IPART's Licensing Framework to develop an optimal compliance regime for drivers involving targeted inspections rather than blanket inspections, and exceptions reporting rather than periodic reporting.

Discussion point 8: Are there ways that the [vehicle] registration regime could be streamlined for point to point transport providers?

We consider that the vehicle registration scheme should be applied uniformly to point to point transport vehicles, with inspection regimes based on risk and registration charges based on impact. Given that commercial rideshare involves the use of private vehicles potentially only used part-time, it may be necessary to consider guidelines for defining 'private use' to assist the RMS in determining whether a vehicle should be charged private or business rates for registration.

Recommendations

- 13 That the taskforce consider developing guidelines for defining 'private use' to assist RMS to determine whether a vehicle should be charged private or business rates for registration.
- 14 That existing registration requirements, such as the letter of permission to transfer registration described on page 27 of the Discussion Paper, be reviewed to assess whether they have a net benefit in terms of safety, and be removed if they do not.

¹⁰ IPART, *Reforming Licensing in NSW: review of licence rationale and design – Final Report*, September 2014, p 378.

Discussion point 9: The taskforce invites comment on whether the current safety and security requirements for taxis are appropriate and whether there are alternative models for how safety outcomes can be achieved.

We consider that the distinction between booked and non-booked services, as proposed by the Discussion Paper, is an appropriate one. We agree that additional safety and security arrangements (for both drivers and passengers) are likely to be required for non-booked journeys. We consider that these should be outcome-focused rather than prescriptive. The current requirements for taxi vehicle identification, communication equipment, and vehicle monitoring, through both in-vehicle security cameras and remote tracking, would appear to achieve safety and security objectives, but those objectives could potentially be achieved more cost-effectively if the requirements were less prescriptive.

Recommendation

15 That safety and security requirements for non-booked point to point transport should be outcome-based, and focus on vehicle and driver identification, communication equipment, and trip monitoring and tracking.

Discussion point 10: The taskforce is interested in views on appropriate safety standards for point to point transport vehicles and how these standards may best be achieved.

For example, are there any requirements beyond roadworthiness you think are necessary?

In terms of **vehicle** standards, we consider that safety standards should be uniform across providers, except for additional safety requirements for non-booked services. For vehicles providing **booked** services, roadworthiness as assessed by the vehicle registration process may be a sufficient standard, although additional compliance checks are likely to be required to ensure ongoing roadworthiness between registration inspections. Vehicles providing non-booked services will continue to require additional identification, communication and security features, which should be regulated for outcomes, as per Recommendation 15.

Recommendation

16 For all vehicles providing point to point transport, any vehicle safety requirements beyond roadworthiness, as assessed by the registration process, should be reviewed and clearly justified. For example, it is unclear how arbitrary vehicle age limits enhance the safety of point to point transport. However, vehicles providing non-booked services will also require additional identification and communication features. Regulation of these requirements should be outcome-based rather than prescriptive.

In terms of **non-vehicle related** determinants of passenger and driver safety and security, we consider that standards should be uniform across providers of

booked services, with somewhat different requirements for non-booked services (as set out in Recommendation 15). We consider that minimum uniform safety requirements for booked journeys might include identifying passengers as well as drivers, recording booking details, tracking journeys, providing facilities for cashless payment, and appropriate protection of data generated by these requirements.

Recommendation

- 17 All providers of booked point to point transport services should be required to adhere to outcome-based safety and security standards that include identifying drivers and passengers, recording booking details, tracking journeys, providing facilities for cashless payment, and appropriate protection of data generated by these requirements.

A key consideration for the taskforce is where the accountability for meeting these requirements should lie: with the booking service, the operator of the point to point transport service or the driver.

4 Consumer protection

Discussion point 11: The taskforce is interested in comment on insurance arrangements for point to point transport providers. How could they be improved?

There is no doubt that point to point transport providers need to have appropriate insurance coverage to protect passengers, drivers and other cars on the road.

In the current NSW regulatory framework, taxi and hire car operators are responsible for obtaining insurance to cover their vehicles and drivers, and are required to have third party property and workers' compensation insurance as well.¹¹ Rideshare drivers may be in breach of their personal insurance policy contracts when they carry passengers for payment.

For Compulsory Third Party (CTP or green slip) insurance, the Motor Accidents Authority (MAA) issues premium-determination guidelines to insurers. The guidelines assess risk relativity based on claims experience; both taxis and hire cars have higher risk relativities than 'motor cars', although taxis are much higher at 1151 for metro taxis (compared to the metro 'motor car' base premium of 100) than metro hire cars at 110.¹² (We note that the risk rating of metro taxis and metro hire cars will increase to 1188 and 121 respectively from February

¹¹ Roads and Maritime Services (RMS), *Taxi-cab Operator Accreditation Package*, August 2013, p 16 and 23; and RMS, *Private Hire Vehicle Operator Accreditation Package*, September 2009, p 10.

¹² MAA, *Schedule of premium relativities from 1 November 2014*, pp 3-4.

2016.)¹³ The MAA does not take the business or private use of a motor car into account when assessing risk relativity, although individual green slip providers may use it as a factor when setting premiums.

The Discussion Paper notes that rideshare drivers are potentially underpaying premium relative to the risk of the vehicle. The size of any underpayment would depend on whether the rideshare vehicles' risk profile was closer to that of taxis or hire cars.

If the regulatory framework for point to point transport changed to distinguish between booked and non-booked services, rather than using existing designations such as 'taxi', 'hire car' and so on, the MAA may have to review its categories for risk rating. We note that the most recently published Schedule of Premium Relativities discusses the MAA's analysis of and decision to continue to classify passenger vehicles used by car sharing operators as Class 1 (ie 'motor car').¹⁴

Whether a specific point to point transport vehicle was required to be insured as being used for business purposes could be linked to its registration status, as discussed at Recommendation 13. If ridesharing were included in the regulatory framework and required to have third party property coverage like taxis and hire cars, we would expect insurance providers to enter the market with appropriately priced products that explicitly cover ridesharing.

Discussion point 12: Could fare regulation be simplified for the benefit of customers?

Do you have any other suggestions about how information to customers could be improved?

Discussion point 13: The taskforce seeks comment as to whether there should be any changes to the way fares and meters are regulated, and whether new technologies offer new opportunities at a relatively low cost to industry.

Currently, maximum taxi fares are set by Transport for NSW. IPART has made recommendations to Transport for NSW on the level of maximum fares since 2001.

Hire car charges may be determined by Transport for NSW (*Passenger Transport Act 1990* s 60A and *Passenger Transport Act 2014* s125) but are not currently.

We consider that, where effective competition (and information to consumers) exist, fare regulation is not necessary. If a distinction is to be made between booked and non-booked services in the regulatory framework, we consider that there is already sufficient competition and information in the booked services

¹³ MAA, *Schedule of premium relativities from 1 February 2016*, p 4.

¹⁴ MAA, *Schedule of Premium Relativities – Effective 1 February 2016*, 5 August 2015.

market that these charges do not need to be regulated. However, service providers should be required to give customers information about the basis of calculating fares including any peak or 'surge' pricing, and an estimate of the fare, in advance of the hiring.

In the longer term, effective competition should also develop for non-booked services (rank and hail) if licence supply restrictions are lifted. As a transition measure, we recommend retaining maximum fare regulation, with a review of its necessity after five years. Discounting below the maximum would still be possible and, as more competition emerged, would be more likely than is currently the case.

For transitional regulated fares, we consider that the existing structure of flag fall, distance rate and waiting time is appropriate and reasonably well understood. Based on information provided to us during our fare reviews, customer confusion is more likely to arise over charges added legitimately but manually at the end of a journey: tolls, booking fee, airport access fee or return Harbour toll, for example. These concerns would potentially be met by clearer information on receipts, as is required by the Australian Consumer Law and the Australian Taxation Office.

Given that these requirements already exist, it is not clear why the NSW Taxi Council has asked the NSW Government to separately regulate receipts. (Discussion Paper, p 34) We consider that it would be more appropriate for NSW metering and fare regulations to be outcome-focused ie, require installation of a meter (or 'fare device' as the Victorian legislation defines it) that calculates fares and produces receipts that comply with relevant legislation, rather than specifying the meter hardware.

Recommendation

- 18 That the regulatory framework for **booked** point to point transport services should not regulate fares for these services. However, the regulations should require service providers to give customers information about the basis of calculating fares and an estimate of fares, in advance of the hiring.

Recommendation

- 19 That, once licence supply restrictions are lifted and the scope for effective competition is present, fares for **unbooked** point to point transport services need not be regulated. As a transition measure, maximum fares should continue to be regulated by an independent regulator. Fare regulation should be reviewed after five years.

Recommendation

- 20 That meters or 'fare devices' for point to point transport services should be required to calculate fares in accordance with regulated fares (where they exist) and issue receipts that comply with relevant legislation.

5 Quality of services

Discussion point 14: Should service quality be subject to regulation? Are there alternative ways to ensure service quality for point to point transport customers?

As a general principle, service quality should not be subject to regulation where a sufficiently competitive market exists. The detailed and prescriptive restrictions on hire car vehicles are a good example of unnecessary service quality regulation that has simply served to restrict competition.

As discussed above with respect to fares, the nature of the rank and hail market means that customers do not have full access to information about price, quality or service availability. There may be an argument for retaining some of the existing quality regulation about cleanliness, a smoke-free environment, air-conditioning etc.

Recommendation

- 21 That the regulatory framework for **booked** point to point transport services should not include service quality regulation.

Recommendation

- 22 That the regulatory framework for unbooked point to point transport services may include regulations for minimum quality standards as considered appropriate, including matters such as vehicle condition and comfort and driver conduct and behaviour (as well as passenger conduct and behaviour).

6 Regulation of supply of services

Discussion point 15: Should the government manage supply of taxi services?

If so, how should they be restricted?

Should there be different arrangements outside Sydney?

Discussion point 17: Should the Government manage the supply of hire car services? If so, on what basis?

We do not consider that there is any economic justification for the Government to manage supply of point to point services, whether taxis, hire cars or other, when a competitive market is able to meet demand.

Licensing arrangements over the years have served to restrict the number of taxi licences released and increase the value of those licences. Numerous reviews have failed to find any justification for supply restrictions.

It may be necessary for governments to continue to subsidise wheelchair accessible services to ensure adequate supply of these services. However, we do not consider there should be any **restriction** on the supply of licences for booked or unbooked services.

We do not consider that arrangements for supply of licences should be any different outside Sydney.

Recommendation

23 That the regulatory framework for point to point transport services should not restrict the supply of licences for any services.

Discussion point 16: Should there be any restrictions on where taxis can operate? If so, how many taxi and hire car operating areas are required across NSW and why? What are the options for broader operating zones?

A more competitive market without supply restrictions should allow for the removal or rationalising of operating zones for taxis.

Recommendation

24 That the regulatory framework for point to point transport services should not include operating zones for the services.

Discussion point 18: The taskforce invites comment on whether industry adjustment assistance should be considered, and if so, how it might be structured.

The recent changes in the point to point transport industry are happening as a result of technological innovation and competition, and are delivering positive results for consumers. Other industries such as music, book and video retailing in particular, and brick-and-mortar retailing more generally, have been similarly affected. Incumbent players and traditional business models must adapt or go out of business. This is how markets develop and those affected are not normally compensated.

However, as noted in the introduction to this submission, the regulatory framework must also adapt, and this presents an opportunity to address some of the accumulated problems of decades of restrictive regulations. We expect that if our recommendations in this submission were adopted, this would lead to more rapid erosion in taxi licence values. If supply restrictions on licences are removed, and services regulated in a more streamlined way, most incumbent drivers and operators in the taxi and hire car industries will be better off, or no worse off. However, taxi and hire car licences will drop significantly in value, faster than they would have by technological change alone, adversely impacting their owners.

When examining similar issues in Victoria, the Taxi Industry Inquiry found:

Despite concluding there are no compelling legal, economic, equity or policy arguments for compensating licence holders, the inquiry accepts that some owners may suffer significant financial difficulties as a consequence of the reforms. The inquiry is suggesting to the Victorian Government that it consider providing tightly targeted assistance where such financial difficulties can be demonstrated.¹⁵

IPART concurs that, while there are no compelling arguments for compensating licence holders, some individuals may suffer significant financial difficulties and considers that the NSW Government could establish a panel to assess targeted assistance where financial hardship can be demonstrated on a case by case basis.

7 Compliance and enforcement

Discussion point 19: The taskforce seeks comment as to what an appropriate compliance and enforcement strategy should be. For example, what kinds of activities should be the focus of the regulator, and which entities should be the focus of compliance activities?

How might compliance and enforcement powers and penalties be adjusted to better reflect any new compliance strategy?

Are there any new powers that the regulator should have?

Should there be any change to the penalties?

How could co-regulatory and self-regulatory approaches be better applied?

The recent Green Paper from the WA Government, *On-demand Transport: a discussion paper for future innovation*, includes a useful discussion on accountability for point to point transport services.

A revised regulatory framework in NSW will need to ensure that the providers in the supply chain for point to point transport have clear accountabilities, and that the regulator is empowered to enforce those accountabilities.

Within that outline, there are a number of options for where accountabilities lie, and the tools required to manage those accountabilities may differ. For example, the WA government is proposing to define 4 key roles in the industry:

- ▼ The dispatcher [or booking service].
- ▼ The licence holder.
- ▼ The vehicle owner.
- ▼ The driver.

¹⁵ Victorian Taxi Industry Inquiry, *Final Report: Customers First – Service, Safety, Choice*, September 2012, p 14.

This removes the concept of a network that provides bundled safety and booking services, and places more responsibility on the licence holder (or owner) than had previously been the case.

In Victoria, on the other hand, after the taxi industry reforms, the regulated roles are:

- ▼ The Network Service Provider (which provides booking and safety services).
- ▼ The taxi operator.
- ▼ The taxi driver.

However, with the removal of mandatory affiliation, most of the regulatory responsibilities now lie with the taxi operator, who can meet some of them by affiliating with a Network Service Provider, or by selecting other service providers. Licence owners continue to have no regulatory responsibilities.

With regard to compliance, the regulator requires sufficient powers to deal with breaches of accountabilities.

IPART's Licensing Framework notes that compliance should be monitored and enforced using a risk-based approach, and optimal compliance regimes involve targeted inspections rather than blanket inspections, and exceptions reporting rather than periodic reporting.

Penalties for breaches should be commensurate and scaleable. Where the only penalty available is removal of a network authority, a breach would have to be catastrophic to justify levying the penalty, rendering the penalty regime essentially ineffective.

Dear Minister,

We are resident of NSW. We don't want to see illegal rideshare uberX. It is unsafe, unlicence.

We don't want to see our community, our children ride with unsafe vehicle. We don't know who's behind the wheel.

Please take action on uberX.

Regarding

Residents of NSW

Dear Minister,

I am a resident of New South Wales. Taxis and hire cars are all great services. But uber x is just shut. It is totally not safe and not insured. I want to be able to choose how I get around my city.

I choose Uber because:

All hire car drivers are government plated n got proper insurance. It is safe to travel with them. But uber x is just not make sense.

Government should support hire car uber and should make more money through HC licences. Uber X is not paying anything to government.

Hire cars and taxis paying too much liabilities like insurances. Taxis operators n council is getting full fees but drivers lost their 50% work cause of this uber x.

Which is just paying normal regional to government. N that it. Is that government fool who loses the money for not issuing licences to hire cars n taxis.

Government should ask uber x, that we won't stop you but get a hc licence or taxi. At least these people should be on yearly commitment. And thus government will make more money that can be used for the development of the country.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because it's a non-judgemental, safe, welcoming and friendly service providing jobs for those who need money and are unable to work ordinary hours.

Dear Minister,

I live and vote in your electorate. I am also a supporter of you as the local member. I am not going to send you the standard email supporting the sharing economy - an email that can so easily be unread and trashed. But I am making a call to you to ask for your support in recognising the huge economic benefits that will continue to evolve from the sharing economy and from organisations like Uber.

I would also like to urge you and your colleagues to seriously consider the role of legislators in this evolution. The role is not to stop this sort of progress through legislation but to stay abreast of these changes, embrace them and ensure that legislation gets out of the way or is enabled appropriately for these inevitable changes to flourish.

As a consumer in your electorate I want the choice unimpeded by legislation that protects only the status quo. I do not see a role for the government to impede new business models regardless of the entrenched revenue that these older models might bring to the government.

We all know from history that change brings . . . well . . . change. And that while change typically has to benefit an economy as a whole to be successful, not everyone individually benefits. It is not the role of governments to stand in the way of these changes and it should be the role of governments to ensure that these changes are able to be implemented without any protectionist pressure being applied by incumbent players.

So . . . hands off Uber and other ride sharing methods. Let consumers (voters) choose which products are better and let the ride providers evolve to the most efficient, popular and profitable based on consumer choice. By all means ensure that the providers measure up in terms of safety but nearly all other aspects should be left to the market to decide. Make sure the parliament knows its role in providing a safe environment but then let the market decide. Above all do not be pressured by the incumbent players to maintaining the status quo. No economy can progress with regressive thinking like that.

I look forward to hearing from you.

Dear Madam/Sir, I am an accredited Hire Car operator, and a Uber Black partner for over two (2) years. I have written to the minister for transport who invited me to make formal submission to the taskforce.

Please consider my points below.

Uber is not a ridesharing service, do not allow Uber to use this term. Please Google ridesharing, If three/four friends share the use of their respective cars and are travelling in the same direction, this would be ridesharing. Uber is a fee for service mostly one passenger at a time, no different to a Taxi. Uber deliberately uses this term to appear to be social and altruistic.

Uber commenced in Sydney in November of 2012, no issues, because it was a premium hire car service, with technology allowing an instant booking, yet not moving into the taxi space. Simply offering passengers a more premium travel alternative. The rates (fares) for Uber Black in 2012 thru to early 2015 was moderate with perhaps 20% more than a taxi service and Uber growing in popularity rapidly.

In April early 2014, Uber got greedy, and had visions of taking over the world transport industry and introduced Uber X, a discount unregulated service, breached all laws and absorbed fines on behalf of their Uber X partners. They also set about to lobby politicians via their users.

Uber was charging drivers (Uber partners) 20% commission of all rides, In April of 2015, Uber put up their fares for Uber Black by 17.5% to deliberately create space for Uber X. They also put up the commission charge to drivers from 20 to 25%, therefore the drivers got no net gain, more so, lost many customers who moved to Uber X.

There are many Global corporations, who have issued edicts to their staff not to use the unregulated, illegal service whilst on company time. Local insurance companies have declined to pay damages for Uber X, because the owners have not covered for business insurance. Uber has not listed because it is illegal in many countries, and no investor will take the risk.

Uber is registered in the Netherlands, in order to avoid paying the ethical/moral duty in taxes.

Please don't allow another American corporation to bully their way into a market, SIMPLY have Uber retract their price rise on the Uber Black service, (which is RMS Hire Cars only) and allow the Uber X customers to go back to Uber Black. Please remember Uber also operates Uber Luxury and Uber SUV, both Hire Car services. All Uber Black drivers would be happy to charge the original rates to customers, if Uber only charged them the original 20% commission.

Most important, Uber X drivers do not last more than three months, because their business is not viable at 50% of Taxi rates. Uber drivers learn this after a few

months, when they see their running costs and wear and tear (1000s of extra kilometres killing the resale value) on their cars. The turnover of Uber X drivers is considerable, hence all drivers are inexperienced, you should research the turnover independently, don't rely on Uber to supply you the data. Having a high turnover, creates inherent risks.

Allowing Uber X to continue is not fair on the taxi industry most of all. The RMS cant have it both ways, i.e. charge approx. \$600 a week to lease taxi plates, yet allow Uber X to operate for zero.

To conclude, simply allow Uber to run with the original Uber Black ONLY (and Lux + SUV) as it was for over two years. They will quickly move to make their service competitive once again (issue txt msg's to all Uber X, that Black is discounted back to 2013 fares/rates), and regain all the customers who moved to Uber X.

Please keep my name discreet from Uber, fearing repercussions.
Happy to provide further input, yours sincerely,

I am an uberX rider and a resident of New South Wales based in Sydney metropolitan area.

I choose Uber because: the drivers want my fare irrespective of where I am travelling, I am sick of taxis pulling up asking me where I want to go and then refusing to take me as they speed off with me leaning into the window. That is my personal experience with taxis.

Even when I use apps like gocatch frequently taxis won't accept my request especially if I need to go a few kilometres. With uber I don't have that problem because drivers want my service and it is extra money for them. I think it's a fantastic idea, very safe and my experience is that every driver has a clean car and is presentable.

I look forward to hearing from you.

Dear Mr Crakanthorp,

Below is a generic message. So before that, let me add my 2 cents.

Uber is a long overdue service that takes advantage of the technology of the 21st century. To push back against it is akin to radio hating the movie star, postal workers cutting telegraph lines, horses biting cars.

Sure, the taxi industry should be given time to adapt and update. But they have had years and they haven't changed. At this point, we can prop up a monopoly or we can encourage evolution.

Just my thoughts. Below is the generic.

I am an uberX rider and a resident of [redacted] electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all pathetic services and I want to be able to choose how I get around my city.

I choose Uber because:

Taxis are rude, [redacted] who do nothing but complain about uber drivers whilst charging me double the price for a stinky ride. Uber encourages customer service and a standard.

Please don't punish uber for trying to provide customer service standards in an under-serviced market.

I look forward to hearing from you.

Dear Ms Leong,

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

The UberX drivers are generally friendlier, lots offer you free bottles of water, mints and offer generally a much better travel experience. When i take a taxi home from the airport, if the taxi doesn't have a foul odour, the driver if not on his bluetooth barely even grunt an acknowledgment of you.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

Should the government be looking at why people have engaged so quickly to Uber, rather than falling to pressure of a union and harshly blocking them? The government should also be looking at;

1. The impact of expensive Taxi licencing which are passed on to the consumer.
2. The quality of the taxi service
3. The time you wait for a taxi vs an UberX

Dear Minister ,

I am an uberX rider and a resident of Willoughby electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: It provides a much needed service in Sydney's congested infrastructure. I have used Sydney taxis since 1970 and unfortunately the bad experiences have far outweighed the good. Taxis not turning up, lack of road map skills, bad driving skills, miss use of road rules and have turned me away from using taxis. I have yet to have a bad experience with Uber.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

There is small change that can give all drivers a pay increase without increasing the meter. All you have to do it make taxi owners collect the drivers GST. And all drives will save money not requiring accountants every 3 months and the ATO will have it easier too less people to chase or GST. I can go on and on. Just make this happn. This is win for taxi drivers and the ATO...

Dear Mr Daley,

I am an uberX rider and a resident of Maroubra electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: Uber shows up when I need a Taxi. Short rides are not a confrontation. You are a welcome passenger not a burden and response times and tracking are excellent.

Bottom line -- fix the taxi system to match what consumers want or face the backlash. History -good consumer service will prevail.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city I refuse to allow my freedom of choice taken away from me because of some ones else profits I want the FREEDOM to chose you have no right to take it away from me

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

All of the stuff below, but also-just because there is an existing system in place why does that prevent a better system from replacing it? Uber works so much better than the taxi system and yet because that industry is losing money to them we have to fight to keep the better system afloat? That's backwards.

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I also don't get a big uncomfortable sigh from an uberX driver whenever I'm going to destination that is not far enough for a taxi driver. It's about time the taxi industry to have a competitor. The taxi industry need to learn more on how to deliver great service from Uber.

Dear Ms Upton & Parliamentary Colleagues,

As a resident of Vaucluse electorate, I would like my interest noted in support of taxis, hire cars and ridesharing services - all are worthwhile supporting consumer choice and all have merit in our growing NSW economy.

I choose Uber on many occasions for the reliability of the service, the cost effectiveness and frankly the safety of knowing who and where I am travelling or more importantly when I have family and friends travel with me in an Uber service - whether that be hire car, taxi or UberX. Having the drivers details, phone number, registration and a record of the transaction are far superior to the limited recourse we have with the taxi service which needs to learn to compete on service.

Compared to the taxi industry who overcharges for a convenient cashless transaction - Uber has revolutionised the user experience. Equally it prevents the grey market economy that exists within the taxi industry who prefer cash to avoid reportable income. And as there is a full transaction record with every Uber, as a small business owner that is important for me to be able to account for my expenses easily in an online portal. Instead of taxi machines that are always out of paper, having to avoid losing a vanishing ink receipt and even the hassle of waiting an additional 5-10 minutes while the eftpos service fails to work show the difference.

With respect to convenience, I normally wait no more than 4 minutes for an Uber. My experience with taxis is woeful by comparison often having no service, no notification and certainly no idea whether the drivers will be safe or even awake (the number of times I have had a taxi driver falling asleep while driving is appalling!)

Please let the protected taxi industry reform themselves to compete - we need free market competitive services and Uber has introduced that. The claims of safety being compromised are as exaggerated as the deputy mayor of Auburns appeal. At least when we choose Uber, we have a person who wants to be doing the job versus someone who hates the company they work for or even worse blames the public and government for their lot in life the organised labour taxi industry.

I would appreciate my interest in this topic registered and noted as part of the debate within NSW government - while the taxi industry can afford to stop work and protest in the streets - we are working hard to make a living and enjoy a superior service.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because drivers are always friendly, Uber has an excellent customer feedback system in place, cashless transactions make paying for my trip quick and convenient and emailed receipts are easier for keeping financial records. So far I have taken 85 trips with Uber.

I refuse to use taxis anymore as I generally find taxi drivers to be rude and taxi companies have never seemed interested when I have previously complained about drivers.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich

I travel a lot in taxis, but these days I am more likely to use uberx as they are extremely reliable (i.e. they show up), their cars are safe and well maintained, and the drivers are friendly. A significantly different and preferred experience to that of taxis - which I realise often is the taxi plate owners fault not the poor exploited taxi driver.

It is the consumers right to chose where to spend their money. And I chose to spend it with those who provide quality service, in this case with uberx not taxis. Uberx should be legal in Australia. Time to move on with the times.

Anyway we shouldn't be worrying about uberx, with self driving cars, the taxi industry is really only going to have another decade of life. They should be worrying about, that not uber.

I look forward to hearing from you and your support with this matter

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Dib,

I am a resident of Lakemba electorate.

Our business recently lost a \$500 piece of equipment that was left on the back seat of a taxi by an employee. We quickly called cabcharge and got no help identifying the driver. By the next day we got in touch with the driver and he knew nothing about the equipment. We have switched all of our business to UberX now so that we have more immediate details of drivers and trips and transparency of all details of trips made by employees on the company UberX account.

I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

I can quickly contact the driver again if the need arises.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because it is a safe and reliable mode of transport. I find the service offered from Uber drivers is exceptional. I use Uber most days and have not had a bad Uber experience. I however I cannot say the same about the NSW Taxi service and I have had many unpleasant and scary experiences with the NSW Taxi drivers. I feel safe with Uber. The vehicles are always clean and today as are the drivers. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system. This is not something I can do in a Sydney taxi! Uber is also reliable and affordable.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Robertson,

I am an uberX rider and a resident of Lane Cove electorate.

I choose Uber because:

I am extremely satisfied with the services provided by Uber. They are efficient, comfortable and respectful, unlike local Sydney Taxi services. I have personally used UberX 33 times over the past year and I have only once had a below average experience (when the Uber driver didn't know how to get to Wynyard station). On other occasions I have been provided with free refreshments (bottled water) and one UberX driver even got out of his car, shook my hand, and opened the door for me.

I am extremely sick of the rudeness and greediness of local Sydney Taxi drivers. On many occasions I have flagged down a Taxi, only for the driver to lock their doors and ask me where I was going, and if it was too short he would just drive off leaving me stranded. On other occasions I've had Taxi drivers add excessive fees or tips that I don't feel comfortable challenging.

I love being able to see exactly where my Uber is and how long it will take for it to arrive. I love how the payment is handled automatically and effortlessly. I love how the rating system makes Uber drivers feel responsible for providing the best service possible.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I love Uber and I never want to sit in another local Sydney Taxi again.

I look forward to hearing from you.

We present our submissions as follow:

1. a. The safety of drivers and passengers must be paramount and, at busy ranks – both day and night – it is most helpful if a supervisor is available to assist passengers obtaining and entering a licensed taxi. Otherwise, normal safety precautions should be maintained, especially by taxi drivers, as they are fully licensed and must be accredited by the Motor Transport Department.
- b. Good customer service is provided by most licensed taxi operators in NSW and every endeavour is made to extend any other service required for consumer protection.
- c. With regard to disability transport: it would appear that only the taxi fleet of cars and drivers are able to service the needs of disabled, due to the fact that taxis have been specially modified for this purpose.

It is apparent that UberX drivers – using private cars – are at no stage able to conform with current disability regulations requiring specialised transport and personalized attention.

2. It appears that the Government will continue to charge 10% GST on all licensed taxi fares, as well as high insurance costs to drivers and passengers. To maintain a good taxi service in NSW all other regulations covering cameras, radios and, if required, modern technology should be available.

3. Taxi operators must observe strict Government rules, and any other operator wishing to enter the point to point transport used by taxis should comply with all existing rules and regulations currently applicable – that would be a level playing field. Applying and maintaining monetary payment for transport of any type whatsoever should be open and disclosed and should be Government controlled.

4. If UberX, which is illegal and unlawful, does not pay GST on fares charged, and does not have the same stringent insurance cover for drivers and passengers (as used by authorised companies and drivers) then at the present time this is NOT a level playing field; in other words UberX – or any other competitor – MUST conform. Repeat: MUST conform!

UberX has been declared illegal or outlawed in many other countries such as Germany, France, Italy and, in particular, South Korea which has stated that if UberX infringes again the fines will be in millions, not thousands.

All taxis in Australia have clear signings and display their number plates and taxi operators on their vehicles, and the drivers have to be Government approved and tested for health and driving ability before they are permitted to work in the transport industry.

Uber and UberX state that they are creating employment in Australia. This is incorrect as they are only depriving legitimate drivers of their livelihood, and taxi

drivers' income is being substantially reduced.

We could supply much more information adverse to UberX, but feel the salient facts have been supplied above.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

The taxi industry should welcome competition from companies such as Uber, Lyft and other ridesharing services. The taxi industry has, for many years, been getting a 'free ride' owing to the outdated and backward regulatory framework imposed by governments across Australia. This has led to extremely poor conditions of vehicles and poor driver training and customer service (recently I've been in taxis where, the rear passenger door wouldn't close making me feel very unsafe; the driver on his wireless headset for the entire trip; the interior smelt like a poorly maintained sewage system).

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

I have taken 33 uberX trips in NSW and have never once had a bad experience. Most of the time, drivers have gone out of their way to ensure a comfortable, safe, and reliable trip for me.

It is highly reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Ms Leong,

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I have been sexually harassed by taxi drivers; forced to sit in a cab that STINKS, I have had the driver barely speak to me and take me to the complete wrong area due to them being talking on their phones and I have been abused for taking short trips and refused entry countless times during peak hour. I have used Uber since day one of its release and because the drivers are reportable by an instant rating system and registration process - i have never, and i mean NEVER had a single issue, in fact I have taken over 100 trips with UBER and been impressed every time. This is an important step forward in the community and I think it speaks volumes for the spirit of Sydney and progress due to superb service. Why do we have to do what is "regular" and normal when a change provides an incredible different in a positive way.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

The form letter is below but I wanted to add this personal note:

I gave up a car I loved to decrease my carbon footprint, use public transport and assist small business self employment by using Uber.

Taxis have been unreliable and I have been harassed due to driver-perceived anonymity.

I woke up in a cab that had taken me to Mascot and I got out to find an alternative way to get to the CBD from Redfern. Another cab driver picked me up with beer and pizza in the car saying he cheated to get the job.

Both experiences put me off taxis.

Now I have a reliable transport service where drivers rate passengers and vice versa. Lost property is easily returned. No cash exchanges in the car, personal assault and robbery has decreased to an almost immeasurable level.

The old uncontested way of taxi-ing the public is outdated and now the equivalent of hitchhiking.

Please let me have the choice of a great service I trust and can afford.

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Notley-Smith,

I am an uberX rider and a resident of Coogee electorate.

I choose Uber because It is reliable and affordable. Taxis' have been a state sanctioned monopoly who offer poor service. I do not accept that the State has a role in licencing ride sharing and this is part of government creep that should not happen in this government.

Over the past 2 to 3 decades most industries have been required to liberalise (including my own). It is the Taxi Service's time to improve or get out. Natural competition benefits everyone and I would be disappointed if you prevented or prejudiced that competition.

Please, show me and your electorate you have a backbone and tell the Taxi lobby to fix up their own backyard before it comes looking for Government protection/assistance.

Dear Dr Lee,

I am an uberX rider and a resident of Parramatta electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my greater Sydney

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 8 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

Specifically, I have used UberX to transport my 91yo friend to and from my place. The drivers treat her with great respect and provide a far superior service than taxis.

I look forward to hearing from you should you wish to discuss my support for UberX.

Dear Ms Leong,

Below are the form letter reasons why I use uberX but I also want to make my own points as well. Not only have the experiences I have had with uberX drivers been exceptional, but the quality of the driver manner and personality have just been amazing. It is like getting into a car with a friend. Every experience has been a discussion about the service, the experiences of the drivers, and our own experiences have all been shared. The taxi industry is doing themselves a disservice in the poor quality of their service including the cars, the drivers, and the backup support. Heaven help me getting something back if I left anything in a taxi. With an uberX car I have had no problem ever getting something back.

I find it disingenuous the comments that the taxi industry have been making about the safety of uberX cars and drivers. I will use this service over a taxi every time and feel much more secure. It is about time that governments concede that the taxi model is broken, that the cost of the taxi plates cannot be sustained, and that uberX has brought about the disruption that has created a much better service. And what is the taxi industry response? Close it down! Well if this is considered then there will be an uproar from the community.

thankyou for your time, I would appreciate feedback on your decision and hope that you can see past the whinging and whining of an outdated and out of touch industry.

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

John,

I have emailed before on this topic and wish to re-iterate my support for Uber in the face of reported action by the NSW Taxi industry (<http://www.abc.net.au/news/2015-09-10/taxi-drivers-protest-outside-nsw-parliament-over-uber/6764398>).

I travel to Sydney on average every fortnight to visit my partner who needed to move away from the ACT for work.

Whilst there we often use Uber, in all of its forms (UberX, Taxi's and Black, depending on circumstance and availability) to supplement public transit, especially for trips late at night, when travelling with luggage or when punctuality is important. My partner has, on numerous occasions, felt unsafe when travelling alone in regular NSW taxis and on at least one occasion was shouted at by taxi driver, promoting a premature end to a night out. Since this event, if there is no Uber taxi or uber x available, she will opt to pay more for an Uber Black or Luxury vehicle, or be late, before travelling alone in a Sydney cab.

Bottom line, Uber drivers have regularly been more friendly have better maintained vehicles and have been more reliable.

I regularly use the "fare-split" function when out with friends to streamline exchanging funds, this is especially important late at night (after midnight and specifically around 2-3am when lockouts occur) as the average, non-uber, taxi driver will refuse to take you unless you have cash.

Yes, Uber prompted this email (and generated the spiel below) but I agree with all of it.

Dear Ms Burney,

I am an uberX rider and a resident of Canterbury electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system, and I never have to fumble around to find my cash or card to pay the driver.

The service is reliable, and Typically, I never wait more than 4 minutes for a ride, whereas a booked Standard TAXI can take over 45 minutes to arrive.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I Believe that the TAXI industry needs a major overhaul, and also healthy competition. Uber is in my opinion something that the TAXI industry should have done 5 years ago. The people who use Uber speak; We want better service, Better Pricing and access to the service when we want it. After all, we are the consumer.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I whole heartedly agree that uber us a great safe and reliable service for our city. I once battled with gettrinf Taxis to Cronulla, with Uber I'm off and out in less than 5 minutes in a good car.

This from the Uber guys:

I am an uberX rider and a resident of Cronulla electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40 times cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Park,

I am an uberX rider and a resident of Balmain.

People will keep dying in car crashes if uber is not allowed to do its thing. It's inevitable that humans driving cars will become illegal. People of the future will look back and think we're crazy for driving them ourselves. Don't be the guy that told Henry ford to make a faster horse. Unfortunately everyone in the transportation industry is bound to lose their jobs, but it's for the best. They will find something else, they just don't like short term change.

I look forward to hearing from you.

I am 100% pro Uber and I fully support this email campaign. Please listen. Uber is a good thing.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Park,

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ride sharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. Not only all of this the car actually arrives unlike many experiences that I have had with taxi bookings. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I have used Uber not only in Sydney but also in other states and have found them to be just as efficient and safe as my experiences in Sydney. When traveling overseas I would not hesitate in using Uber either. While I have many times felt at risk when taking a taxi in Sydney and when traveling.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ride sharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ride sharing is a safe, reliable and affordable option and I want it in my city. In my opinion the taxi industry needs to respond to the a community need or face the consequences.

I look forward to hearing from you.

Dear Mr Notley-Smith,

I am an uberX rider and a resident of Coogee electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

It is far better service available.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

The drivers of UberX follow an agreed route. As a long term resident of the City of Sydney, I have experienced many cab drivers who are unable to follow instruction on the preferred route of travel.

The drivers of UberX do not refuse to transport me to my desired location. Having the need to often travel short distances, I have experienced Sydney can drivers who refuse to take my fare by either a) keeping doors locked until the location is discussed through the side window b) ask me to exit the cab because it is "too short", "not worth my while" or "my shift is ending".

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

Having travelled extensively in the U.S., I have had many positive experiences using the UberX product. More positive experiences than when using U.S. taxi services.

I look forward to hearing from you.

Dear Mr Kean,

I am an uberX rider and a resident of Hornsby electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable - Taxi's are not. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Attorney General,

I am an uberX rider and a resident of Vaucluse electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

It creates jobs and improves the market offer through increased competition.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Kamper,

I am an uberX rider and a resident of Rockdale electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

Also important to me is that my Uber driver can always speak fluent English, they always know how to get where I want to go, they always take the shortest possible route (or happily allow me to direct them via my preferred route) and their vehicles are always in pristine condition. These are things frequently not found with taxis, but I don't have any choice or forewarning of individual taxis and drivers who don't meet some or all of these conditions before I get into their vehicle. I want that information so I can make informed decisions about my preferred mode of transport.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than several minutes for a ride. And they actually show-up!

It is affordable. It is about two-thirds the price of a cab and the customer service is second to none. Complementary bottled water & mints for starters. But more importantly, friendly & helpful service.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Ms Leong,

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I also choose it because it allows me to meet and interact with different people from our community that I wouldn't usually have the opportunity to meet. This is a social benefit to me.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I have lost \$27,000 worth of photography gear in a Taxi before and there was absolutely no accountability with anyone I tried to contact about tracing the loss.

I find the service more friendly and the driver's actually care about their appearance and professionalism.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I don't have to hand over a credit card which is quicker, and more accountable given I use Uber for business.

I also have a business Uber account which means I can track staff movements and not worry about any complicated payment strategies.

I have been a big fan of your policy and the way you present to the public and I MASSIVELY support your other endeavours such as supporting marriage equality.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Park,

I use uberX and live in Glebe, in your electorate.

The great thing about taxis is you can flag them down. But that's pretty much it. From a customer experience Uber, and uberX specifically, is streets ahead.

If you've used it you'll know why. Primarily for me, and my 55 year old single mum, it's safety. They're vetted drivers, not just by Uber but by everyone using the star rating, who are then tracked with gps. Also there's no cash. Plus i can watch my mums trips on it. I can't tell you how much safer that makes her feel.

It's quick, you're never waiting that long. And they always show up when booked, which is not something you can say about taxis. And really, turning up is step one of a two step service. Pick up, drop off. But if you call the centre they have absolutely no idea where they are or how long they'll be. You may as just yell from a window and hope.

It astounds me that in light of experiences like mine, and I'm sure the experiences of thousands of others, and in the face of extraordinary public support of the services that the government would look to restrict it.

And if it's about money - then what a shame that safety is left on the curb so that taxi company's and the tax office can run off with cash.

I look forward to hearing from you and hope you will support Uber in parliament.

Dear Attorney General,

I am an avid uberX rider and a resident of Vaocluse electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for.

It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I'd also like to specifically point out that in a city of nearly 5 million people, I have never been able to understand why every single taxi company has the exact same shift change over time, making it impossible to get to where you want to go around 3pm and 3am every single day. Many times I have been stranded on my own in the middle of the night, with great difficulty getting home because of no transport available, putting my safety at risk and I've witnessed others in the same frustrating situation. Since Uber came on the scene, this problem has been rectified.

I personally believe that the NSW taxi industry is greatly lacking behind in their services and instead of wasting their time campaigning against Uber, they should be asking themselves what is making their customers choose Uber over them and finding ways to improve. For example, reliability and not ripping people off would actually be a great place to start.

I have lost count how many times I have ordered a taxi which never showed up and when you call to check on the status, they never tell you how much longer you have to wait - they just say "next available". I have been late to important appointments and missed opportunities, due to an unreliable and unprofessional service by the NSW taxi industry. With Uber, I have never had such issues and their cars are always clean and fresh and their drivers are always so courteous, polite and professional, which I truly can't say about the taxis in Sydney.

Uber listens to its customers and genuinely cares about delivering a top quality service at a fraction of the cost, so its not really rocket science, is it? I firmly believe that a little healthy industry competition is what should lift the overall quality of service.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Park,

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system. It feels so much safer than catching taxis. I know who picked me up, what time it was, what route they took, and what time they dropped me off. I left a bag in a taxi once and tried to ring up and find out about it. They told me they would have no idea what taxi I hoped into.

Every taxi that I have gotten into lately has felt like a death trap. 350,000 kms on the clock. Jumpy brakes. Worn out seat belts. Drivers that don't know where they are going.

Uber is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Attorney General,

I am an uberX rider and a resident of Vaucluse electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system. Have you ever been in a cab with a driver who have religiously preached at for being a single ethnic female rider or who has venomously opposed rainbow flags across Oxford St because it's against one type of religious text or another?

It is reliable. Typically, I never wait more than 4 minutes for a ride. I receive constant updates on my driver's ETA, as well as access to the driver's mobile in case I have questions. I am never left waiting for a cab that never comes, or a courtesy call from pre-booked taxi driver at being late, or not being able to arrive at all!

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none. Uber driver cars are cleaner, well managed and never smells like vomit. I have yet to be in one that is missing part of the bottom of a car.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an UberBLACK driver and a resident of New South Wales. Ride sharing is taking away hire car business and will result in bankruptcies.

Cars are expensive to run. Already my annual income has dropped a third.
Something I can't afford

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because I enjoy saving money using uberX and having the option to splurge on a nice car when it its a special occasion. Uber drivers are incredibly friendly, you can sync your music in the ride and are so much better than all the taxi drivers I've had in the past. I have never had a bad experience with an uber driver, whereas I have had bad experiences with taxi drivers. I like that you know who is picking me up, what star rating they have and how reliable they are.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I do not ride with taxis because:

1. More expensive
2. Drivers are often discourteous, poor service
3. There is a significant surcharge to use credit card
4. The fact that you cannot pay via an online account system seems ludicrous in this day and age. I do not regularly carry cash and often taxi drivers do not carry adequate change and there have been instances where taxi drivers have abused me for only having a \$50 note
5. The lack of accountability of the drivers in terms of driving quality, quality of service, compared to Uber makes me less inclined to use taxis

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I used to be philosophically against Uber but now having tried it I recognise that it is a far superior service, and our response should be to rather modernise the current taxi system and give people an incentive to use their service, rather than removing the excellent driver service that uber offers.

I look forward to hearing from you.

Dear Mr Notley-Smith,

I am an uberX rider and a resident of Coogee electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city as well as cleaner cars and better customer service!

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none. It is not uncommon for new business models and technology to disrupt an industry. This is what innovation is all about - shouldn't we be promoting this kind of thinking by businesses?!

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

To the Secretariat,

I believe I have valuable, objective and interesting input to offer to this debate. I am a supporter of Uber but I also have some concerns.

I am 52 years of age, I live in Curl Curl on the Northern Beaches in Sydney. My family and I use Uber as passengers and I am also an Uber driver. The part-time income has been a vital income supplement which has enabled our family to survive while we prepare to launch our Start-Up businesses.

I forward my opinions and perspectives separately as; a Constituent, a passenger and an Uber driver.

My opinion as a Constituent

I believe future economic prosperity for Australia relies on growth in the technology sector. I believe Australia has much work ahead to support and grow this sector. To disallow a modern business model such as Uber would be, in my opinion a concerning and backward step. I believe the government needs to embrace efficient services which are popular with voters.

As a constituent, I do have concerns about foreign companies implementing sleek and profitable business models which extract profit to the USA or other foreign countries. I would like to see Australians benefit from the revenues generated by such business models and I believe the government needs to get creative to ensure such businesses are taxed fairly and appropriately.

I am not sure if applying a (no threshold) GST to all drivers is the answer. I am a driver myself, I personally have no problem with collecting GST as a driver. I'll probably earn \$35,000 this financial year driving Uber, I'd collect \$3,500 in GST and then claim absolutely everything. This will be great for me but unfortunately will leave no benefit to the ATO, Government or voters. I believe this move will just deter many drivers who won't know how to deal with BAS, impede growth and at the same time generate futile administrative costs. I assume this ruling was a knee-jerk reaction to keep the taxi lobby at bay or some other reason but I doubt it's the answer. I believe the government has to get smarter and more creative with regard to taxation for overseas tech business models.

I am concerned for the taxi owners however the disruption represents a classic change scenario where businesses and in these situations casualties do occur. We are looking at an old and generally disliked business model vs a new and popular business model. From my experience Uber is customer focused whereas taxis seem to be all about the needs of the owners and the drivers with the customer long forgotten - this industry led with its chin to be disrupted. I believe some of the blame is with the regulatory bodies who simply could have managed taxis better and regulated them more appropriately.

I believe it would be fair for taxis to somehow be compensated, either by the government or indirectly by the new disrupting businesses (a levy or tax).

As a constituent I believe the new popular ride sharing services should be totally embraced and supported.

My opinion as a passenger

I never want my wife or children to ever hail a taxi. I get them to use Uber where a full digital trail will exist from the time the ride is booked to the time they are dropped off at their destination. They will always know how long until the ride arrives as they can follow the Uber car's approach on their Uber App. I take comfort in knowing that the driver's criminal history, driving record and personal details are all in check and that the ride will be in a clean, comfortable and safe car. I also know that the driver is likely to be a good driver (if they are not, their rating falls and they will be dismissed) and if the driver has been rude or we have any dispute about the fare, like a longer route taken Uber will quickly attend to my report and/or refund any unfair charges. This is a brilliant customer focused service.

I love using Uber as a passenger, all the drivers are concerned about their ratings, so as a result their cars are clean, they are polite and they even extend special treats like iPad use, choices of music, chocolates, mints, bottles of water, phone chargers and I have even seen comfortable cushions. My phone turns into a GPS while I am in the car so I can follow the same map to ensure the driver is following the recommended route. Uber drivers are unaware of the passengers chosen destinations until the passengers enter the vehicles, this stops Uber drivers from ever choosing selective trips. This is a clever business model resulting in great customer service

Taxis by comparison are generally dirty clapped out vehicles with rude drivers who most of the time seem to be talking to other persons on mobile phones for the duration of the trips. Often the drivers refuse to accept trips if the destinations are not to their likings. The last time I booked a taxi, the receptionist told me "first available" when I pushed her for more detail she rudely repeated 'first available' and then hung up on me. This was the last time I ever used a taxi.

Uber drivers are people who can afford a car. I have made the observation that this generally means the drivers are often more established and/or organised residents from within the community who are more likely to offer a better service than employed taxi drivers.

As an Uber Passenger, I highly recommend Uber to be embraced by the governments of Australia.

My opinion as an Uber driver

The part-time job which Uber facilitates for me has been a life saver and is my best option to supplement my income. As an Uber driver, I can log on and log off as I wish. With two children at school, two start-up projects and a wife who also works part time, the flexible working hours are to my optimum advantage.

As a driver I constantly hear feedback from the passengers. Most passengers seem

passionate and even enthusiastic to disrupt the taxi industry. Many express bad experiences they have encountered with taxis, their distaste is such that they even seem to find enjoyment in being part of the current disruption. Most passenger love the entire Uber business model and experience, there is a real positive feeling and excitement attached to the experience.

As a driver I feel comfortable that no passenger can 'do a runner.' I also have the opportunity to rate the passenger after each trip creating an even level of respect. I also have the opportunity to report unruly passengers, unruly passengers will be warned or even refused.

Sometimes Uber driving is frustrating, after deducting fuel and vehicle expenses plus vehicle wear and tear, the pickings can be slim. However, if I choose my hours prudently the financial rewards are worthwhile and as Uber grows the trips come more frequently and are even becoming available deeper into the outer suburbs.

I did have an issue with Uber regarding insurance. I believed I was covered by Uber's contingency insurance plan if an accident occurred while Uber passengers were in my vehicle but I ended up having to pay \$650 from my own pocket after an accident where I was not at fault. I found Uber to be a little smug in the way they dealt with the situation leading me to disagree with the current business model that intends to gain profit while pushing most of the insurance obligations back on the struggling drivers. This is very cheeky in my book, particularly when Uber would be in a position to negotiate a better deal for the drivers through the power of numbers.

Uber seems to be very strong with all other communication to the drivers; marketing, referring new drivers, incentives, events which require more drivers etc but I haven't seen them being very forward in explaining to drivers exactly what their potential risks or insurance exposures. Uber seemed to think I should have read the small print. I am possibly more savvy than the average driver and I still got caught out. Hence I believe this is one area of business which requires some review.

As a driver, I highly recommend for Uber to be supported by government but I believe Uber's insurance obligations require review.

I hope my input is useful in some way.

I have given some thought to the points I would want to raise and include the outline below. I look forward to elaborating on my assertions and would welcome the opportunity to ensure my submissions contribute to the Inquiry. I apologise in advance for any typo errors or difficulties in understanding the points I raise. I have no affiliations, except being both an Uber and taxi user, with a Cab Charge Account

1. The promotion of consultation and gathering of submissions has been limited, reducing the reach of valuable individual submissions. I acknowledge the role of interest groups, but assert strongly, their views may not be representative of the travelling public. As a person with a chronic illness, I am not affiliated to any group, nor give consent for my view to be represented.
2. The mechanisms and processes to engage hard to reach groups through the review are not clear or methodology published. Other opportunities to promote the review in taxis, Uber vehicles, on Cab charge bills etc would increase participation.
3. In discussing the review with the NSW Taxi Council, I am advised that submissions will remain confidential during the review. This undermines public accountability and transparency, suggesting that some interests have an unreasonable influence in this independent or past process.
4. The commissioning of this inquiry by Andrew Constance and the instruction of increasing compliance activity against UBER by Duncan Gay is a curious indication of government 'not being joined up'
5. In acknowledging 170million taxi journeys per year in New South Wales, Uber is a growing international phenomenon seeking to modernize travel options. I liken taxis to a VHS option in a fast moving digital landscape. Legislation and regulation needs to keep pace with such change, working positively and progressively with diverse stakeholders.
6. The overall standard of satisfaction amongst taxi users in my wide circle of associates is low, when compared with Uber use. Main complaints include:
 - a. Frequent (internally) dirty or unkept taxis
 - b. Despite quarterly roadworthy checks, the experience of failed headlights and tail lights does not inspire confidence in routine maintenance of taxis
 - c. Taxi drivers frequently check destinations when hailed at between 2am and 3am and refuse fares for short journeys.
 - d. The standard of English and compliance in instructions/directions is often poor. There should be a minimum standard or level of spoken English. Concerns are expressed that in recent years a higher prevalence of overseas migrant drivers suggest that such groups are gravitating to low paid work and not enjoying employment protection or other reasonable conditions and rewards.
 - e. The price of taxi plates in the market leads the situation to be a corrupt and exclusive market, where high charges and reduced competition fail the interests of the customer in a supposedly regulated industry. Plates should not be for sale as a marketable commodity and in the gift of government through a pure cost recovery

registration system.

- f. 20 friends (at a dinner) last week all commented that meters are left running whilst payments are processed
- g. When challenged taxi drivers are routinely intimidating, rude and aggressive. Complaint systems are cumbersome and do not inspire confidence in positive outcome or remedy.
- h. Taxi journeys are often increased in duration and length by drivers' rorts.
- i. In the last month, despite bookings, several associates reported failure to show for bookings.
- j. Early morning pick-ups and late night journeys reveal tired and inattentive taxi drivers. There should be maximum and monitored driving periods for paid drivers.
- k. All friends have reported taxi drivers engaged in inappropriate conversations, of a racist, sexual or discriminatory nature.
- l. Expected levels of service from taxi drivers assisting with luggage is low prevalence.
- m. Too many taxi drivers wear iPhone headphones or engage in telephone conversations during journeys with third parties, compromising their attention
- n. Uber drivers seem to work for shorter periods and on demand, improving responsiveness and safety.
- o. Uber vehicles are less than five years old, many more recent and have minimum standards for presentation

7. There should be a taxi driver customer rating system and periodic review to improve standards of service, using apps similar to Uber
Additional costs in using cash and credit cards in taxis is an unwarranted additional cost and can be better managed through applications like Clipp

8. Referring complaints for taxi company attention, demonstrates limited oversight in reviewing patterns and trends. Further, there is no periodic public reporting of complaints to improve industry governance and public accountability. Seeing the numbers of suspensions/penalties/outcomes would engage the travelling public. It appears that neither government, the regulator, or the taxi industry sees merit in public engagement.

9. Given the number of less satisfactory experiences and potential complaints; it is clear that the current complaints system does not invite valid complaints; or the travelling public has a high tolerance to poor standards that would be addressed in other industries

10. Taxi drivers seem immune to road traffic regulations. Yesterday within two hours and within fifty metres of my home, I witnessed over a dozen pick-ups and set downs in lines of traffic at lights, no stopping zones etc (with no consideration to other road users, increasing risk to pedestrians etc)

11. By recent experience, the RMS complaints system is cumbersome and not user friendly. The published internet policy refers to a general no 132213 from a taxi complaints link which is not valid... Consequently, as a user, I deduce the system is outmoded and poorly managed.

12. Taxi drivers are regularly not subject to routine RBT and waved on. There are few visible compliance activities seen by the public, and would argue RBTs are a universal and positive opportunity, given that taxi drivers would alert their network.

13. All uber and taxi drivers could be subject to back ground checks and cost effective registration. (Higher standard) medical checks may not be a reasonable requirement, if other driving capability regulation is maintained by RMS.

14. The taxi industry appears to work cooperatively with the police to move people quickly at peak times of night. A differentiated class of regulation would give access to taxi ranks and bus lanes only by 'hailed cabs', other private hire would be treated as ordinary users

15. I have been assaulted in March by a taxi driver on leaving his taxi, after I demanded that he give me change. Fortunately, an unmarked police patrol intervened and took no action. Their first response was that I could be a fare evader! Obviously, taxi drivers are exposed to higher levels of routine risk, but on occasion, there are drivers whose behaviour needs better management and moderation. I was too distressed to report the occurrence AND feel that the police failed in their duty to protect the public by having zero tolerance to taxi violence and aggression.

16. There are some concerns that the industrial rights and practices in the taxi industry is one of the last bastions of an over-controlled workforce and would benefit from limited and managed deregulation. Over time, the objective should move towards self regulation. Unfortunately, I would suggest that institutionalization in the industry does not make the culture ripe for early self regulation.

17. I have been regularly overcharged when using credit cards and cab charges by rounding up from the driver. It is difficult to challenge this routine over charging. Journey receipts would provide details of the journey and both the vehicle, company and driver, providing info for complaint or challenge. This information is routinely available through Uber

18. Receipts should be given for all taxi journeys. I see drivers keeping private books, indicating that as a cash business, there are significant potential for tax and under declaration of income returns. Joined up cooperation with other regulators is long overdue to maintain and improve falling standards in the taxi industry.

19. Having routinely used Uber for three or four months; we have enjoyed quicker response times across Sydney. Many taxi bookings (with more vehicles) take longer... All journeys have been significantly quicker, more comfortable with offers of amenities. Where costs are 30% cheaper, it is an indictment on the costs and efficiency of regulation.

20. Taxi fares and tariffs are no longer as transparent than they once were, generating confusion. amongst users, not seen in UBER where pricing is estimated

and clear

21. A tariff or 30c surcharge on all private hire would fund accessible taxis.

22. Female drivers are under represented as taxi drivers. This issue requires analysis and research, to promote greater equality. There are concerns that the industry is male dominated and outmoded.

23. The overall condition and age of taxi fleet gives great concern about economy, 'greenness' and environmental concerns. Observing black smoke and oil burning from exhausts in older vehicles is a concern.

24. There should be a differentiated regulatory class between private hire and Hackney Carriage or 'hailed cabs'.

25. Uber and other potential providers should work with the insurance industry to develop products to better suit protection of passengers. Standards for cover can then be agreed at a Federal level.

26. The schedule and speed for regulating 'ride sharing' needs to be reasonable and accelerated.

27. Consideration for taxi and transport cover in regional NSW and metropolitan areas needs sensitive management. A single size does not fit all. I am not qualified or experienced to provide recommended solutions, other than having experienced better pricing in Coffs Harbour.

28. Rather than regulating cars AND drivers, a way forward would be all UBER vehicles being clearly identified by a "R" for Ride share and can therefore be stopped by highway patrols for checking. When at the roadside, routinely they could be reported for tire tread depth etc.

29. Other jurisdictions have seen a change in taxi usage with decline of 50% in some American cities; the market share is growing and consumer choice should be respected by government and regulators.

30. Some taxis solicit fares at higher than normal tariffs... "If one wants a cab in peak times, using my cab will cost you \$50 for a usual \$15 journey" I have left three cabs on this basis in the last two years.

31. Point to point taxi sharing should also be examined and promoted, allowing consumer choice and manage costs

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. I have previously been assaulted in a taxi and while the police were involved with having to stop the vehicle and the driver acknowledged fault he was allowed to continue driving. There is no record on the driver's file as the police would not charge him. Future passengers are at risk.

With uber drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is, what rating they have and what car I should look for. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system. I can also provide realtime feedback and am contacted by uber team members to understand more about the ratings.

It is reliable. Typically, I never wait more than 10 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

First of all, I love Uber ver much.

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because I have had so many horrible, repulsive experiences in Sydney taxi's. Sydney taxi's are not safe, particularly for women. The drivers consistently refuse to accept cash or provide change. Some make inappropriate sexually explicit comments to women, including me. Many are simply rude. Their cars are not maintained and are often appear unroadworthy. Exorbitant fees applied by Cabcharge are unjustified.

I use Uber because I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Ms Leong,

I love über .

The drivers care, are friendly, have super clean cars, are cheap, are interested in me, and usually only a few minutes away. I can also rate them I am regularly disappointed with taxis. Often dirty, unfriendly and don't know Sydney that well. I can't rate them.

I want uber to be available to all Australians including me.

The taxi industry needs a rocket under it.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: the level of service is of a much higher standard. All the cars are clean and well maintained. The drivers are professional and safe and don't talk on their mobile phone and drive like I constantly experience with Taxi drivers. I am able to split the fare easily, share my ETA with family and friends and know the licence plate and photo of the driver before they arrive. The app is easy to use, saves waiting unnecessarily and there is no guilt trip or refusal of fares for short distances like I've had before with taxi's.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

The attitude from many, many existing Taxi drivers is appalling. I cannot tell you how many times I've been asked to get out due to it being considered a 'small fare' (city to Pyrmont - \$12 fare) - this i must stress has never occurred using Uber. Near 100% of taxi's are also driven by people who are in their phones for the whole journey - not focussing on the job they're meant to be doing! (Driving safely)

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 5-6 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my options.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I have had enough of the exorbitant prices I have to pay to get around Sydney with a taxi, Sydney taxis are amongst the most expensive in the world that I have come across, more expensive than European, American and even Tokyo taxi services.

I am typically treated like a second class citizen by taxi drivers and having to beg for a taxi to travel to many parts of the city because they "aren't going that way" or they "don't like the look of me".

Often the taxi cars are worn, dirty, the drivers don't know where to go, they take the least direct/time saving way, the drivers do tend to be smelly, I hate how they charge a 10% fee for paying by credit card, I hate how they charge a "booking fee", I hate that I can not see which taxi is the one I have booked, I am told it is "around the corner" only to have to ring the taxi company 15 minutes later for another as the first never showed up, I hate how taxi drivers treat the roads as their own private race tracks, I hate that many don't know simple road rules, I hate that they will not pick you up if you look like you have been out for a couple of drinks, I hate how you can not rate the experience and the driver,...

I do love how Uber gives an alternative option for those of us who are sick of being let down by taxis over and over.

If taxis can not compete in the market, then they need to step up their game, and if need be, the government should reduce the high costs taxi car owners have to pay to be licenced as a taxi. Competition in the market place simply benefits the consumer, at the end of the day, the Australian people will benefit most.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Crakanthorp,

I am an uberX rider and a resident of Newcastle electorate. Taxis, hire cars and ride-sharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

Furthermore the Uber cars and drivers are generally better presented and more courteous towards me.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ride sharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ride-sharing is a safe, reliable and affordable option and I want it in my city.

I would add that continuous and mounting red tape and over-governance which generally is a knee-jerk reaction to minority groups and financially interested parties (in this case the Taxi industry) becomes an ongoing burden to business people or in the case some Aussies who want to make a few extra dollars.

Let people choose the level of service and the type of services that they want not the state government and certainly not lobby groups for the Taxi industry.

Having competing services may benefit both business models in the long run and give consumers choice which is currently lacking.

I look forward to hearing from you.

Dear Mr Park,

I am an uberX rider and a resident of Balmain electorate. The taxi industry has for far too long ignored the expectations of their clients and have monopolised paid car services in Sydney. As a women, I am highly aware of my own and others' dangerous encounters with taxi drivers.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

Firstly, regular taxi drivers often refuse to serve for short rides within the city as opposed to longer hauls especially after a night out in the city. As a lady, I am greatly concerned about my safety late at night in the city. My experience especially in the Kings Cross area has been that taxi drivers outright refuse to drive to Zetland - there was a night where I stood there alone at 3am as 4 cabs refused the short haul - I was sober and did not pose a threat of any kind to the drivers, they would put their window down ask where to and say no and take off. This is where uber always comes in handy.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 10 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: The cars are clean, reliable, affordable the drivers are friendly and they really want my business.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of Erskineville, New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

- It's a better, friendlier service than a taxi
- I'm guaranteed to be picked up (taxi drivers have even refused to take me home from work in the city to Erskineville, apparently too short a trip!)
- they are safer drivers
- the metering/route is honest (google maps directs the car to the destination I enter)
- the transaction is safer for everyone (no cash; a record of who gets into which car)

These are obvious benefits to the community and I'm therefore asking you to do the right thing by the people, instead of caving in to lobby groups that represent a small group with vested interests to protect.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

Further more I have used both taxis and Uber to travel around Sydney and I can honestly say I have never had a rude or non understandable Uber driver which I can't say about all the Taxi drivers I have met. I believe the rating system is an excellent tool in indicating to others and Uber the level of service received.

I look forward to hearing from you.

Dear Alex

I am an uberX rider and a resident of Sydney electorate. I love Uber.

I love the sense that my choice to use Uber gives someone a job. A job where they choose their hours. Where they are protected by reasonable systems that work for users, drivers and Uber.

It's time regulation caught up with the new ways of doing business.

Please support Uber.

I do feel safe using Uber. They turn up when I book them. It is cheaper, I think about 25%.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South

I look forward to hearing from you.

By the way, I also am grateful to you Alex as a great local member.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

HANDS OFF OUR SHARING ECONOMY!!!

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because: it was a very clean and efficient trip, payment was easy, the car showed up in under a minute, the driving was excellent, the car didn't smell or sound like it was going to fall apart. I will definitely recommend it to anyone and I will certainly use it as often as possible.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

The below email is a generic template that I assume you will be receiving many copies of but it states my opinion perfectly. As a young female uber makes me feel like I always have a safe route home that isn't going to cost me a fortune. I don't need to leave a safe location to find a driver and I don't need to have cash or even a credit card with me. The service it provides consistently exceeds expectations and I believe healthy competition in the marketplace provides greater outcomes for everyone.

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich, and Mr Notley-Smith,

I would like to share a story about why I think Uber is an exceptional service that needs to keep running in Sydney.

I grew up in Coogee, and now live in Pyrmont.

My parents have an elderly neighbour, [redacted], that at 96 years of age is still quite spritely, doing his best to continue being a part of the community.

[Redacted] visits the [redacted] Club every Saturday for lunch and some games. My father organised a weekly taxi-booking to take him from [redacted] St, Coogee to the [redacted] Club (redacted).

The first week, the taxi came, no problems. The second week though, no taxi came. The third week, no taxi came. Each time [redacted] was left waiting on the footpath, no notice of whether a taxi would come or not.

My father called up the taxi company to give them an earful, but he said that the operator was always very lovely and very apologetic. She tried her best to help, saying that the booking was made, but no taxi drivers would accept ride as the fare was too small. My thoughts on this ... well, what can you do? I guess a short fare from Coogee to Maroubra isn't very attractive, but Taxis are meant to fill a gap in the public-transport system, and they had accepted his booking. If you had known that the taxi wouldn't come, you could make another plan. Instead you are just left in the lurch.

When I heard this story, I told my dad to get onto Uber. Having used the service extensively, I know that you are almost always guaranteed a driver, and they are with you within a matter of minutes. You have their details should you need them, and you can see their location on a map. Not only that, but services like UberAssist are in place for this very sort of situation! The drivers are trained to manage riders with a greater level of need.

Now, as a young man in my 20's, Uber serves a very different purpose for me. It is convenient, cheap, better quality, and more reliable than regular taxis. Not having to bother with payments, and being able to track where my driver is is eminently useful.

After talking to my dad about our neighbour [redacted] though, I see that services like Uber can also fill many other needs. It should never have been this hard for [redacted] to get a ride to Maroubra, and his is just one story, but I do earnestly compel you to support Uber, and not takeaway a service that is really helping the community.

I understand that there is a difficult balance between a highly-regulated taxi industry trying to compete with a new, unencumbered Uber. But the answer is not to regulate Uber out of existence. It is to fix a broken system. The taxi industry as

it is today is flawed. It is too expensive for the level of service provided, and Uber shows a clear pathway towards a better system. Better quality, cheaper, and also safer. There aren't cameras, true, but there is constant GPS tracking of your location, as well as the fact that you ALWAYS have on file the drivers details.

Thank you for your time and consideration, I am happy to share this story or provide further details if necessary.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

On top of all this Taxis are always dirty, smelly and don't know where they're going with inexperienced drivers that ask for directions constantly. Taxi companies are a monopoly with there absurd credit card charges. I can't believe they have the hyde to complain or protest. Uber is better than them and they are obviously threatened.

It's our right to a chose!

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

As a woman's perspective, I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system. I also do not have to wait on the street for very long (e.g. Kings Cross at 2am on a Sunday), as my driver calls when he is right outside.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

To whom may it concern

hi there

so many things can be written but I believe you guys already know them just writing few points such as

1. UBER is playing with everyone they saying its cheaper but in realty not big difference than taxi fare I used personally few time its totally same price and in busy times they charge whatever they want . there theory is get 100 pax and rip off 10 pax to give promotion to anothers.
2. few days back when I opened my UBERapp they saying 20\$ discount if I email to taskforce saying NSW need UBER. that's how they playing dogzy games.
3. if UBER wants to stay why don't they become taxi network. but no gona like it because they cant charge whatever they like.
4. lets say I am a uberX driver and I give my phone to someone else to work and lets say that guy done something bad to female passenger then UBER gona give my details to police but I will simply say that I lost my phone how hard lose anyone phone. so think ?????
5. I am driving silver service taxi from few years my all client saying how come any car can be a taxi like uberx.
6. if you cross red light you get ticket straightway but these people committing crime no one catching them.

In conclusion, UBER should be banned or heavily regulated

Dear Minister,

I am an uberX rider and a frequent visitor New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around the city.

I choose Uber because:

I can depend on them at my specified time.

I can depend on them even at odd hours vs I had booked a taxi a few times and some didn't even show up.

It only takes minutes to book vs waiting long time on the phone Easy pay Clean cars

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

But most importantly, I am fed up with taxis denying my short distance fares or being angry about it. I really shouldn't feel sorry for making a short distance trips on a rainy evening. Uber provides me with better and friendly service, which I believe that I am entitled to as a paying customer.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Park,

Below is the email written by Uber. I concur wholeheartedly. I'd also like to add that Uber drivers seem so much happier than cabbies. I've asked them why, and it's because they simply make more money driving. Taxi drivers, on the other hand, are a whole different story.

--

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

Dear Ms Hay,

I am an uberX rider and a resident of Summer Hill electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system. And as a woman in this society of rape culture and street harrassment, I wish to have a viable (affordable) method of getting around at nights without being subjected to the dangers of the streets.

It is reliable. Typically, I never wait more than 4 minutes for a ride. And unlike Taxis, the uber always turns up. I couldnt count on two hands the number of times a taxi I have ordered has failed to arrive.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Dib,

I am a very happy and confident user of the uberX rideshare service and a resident of Lakemba electorate. Taxis, hire cars and ridesharing are all great services and I strongly believe the people of NSW should be able to choose how we get around this city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none - UberX has allowed me to share a ride with people from all walks of life who aren't just Uber drivers - they are stay at home fathers who work their own hours, retired teachers who were bored being retired, and I even shared a ride with a nurse who drove people for the interesting conversations!

As my Member for Parliament, I hope you will support a great service for the people of NSW and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

I have travelled extensively and have used Uber - with the same app - in over 15 cities around the world. This service is for this time and created by generation of people who appreciate the value of trying something different.

I genuinely hope that the Government will stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

I also choose uber as I have had so many dodgy and creepy taxi drivers that I refuse to ride in them.

Uber all the way

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I've also had airport taxis suggest I use Uber as I live so close to the airport. E

Overall, the Uber experience

I look forward to hearing from you.

To whom it may concern,

uberX is an important market changing force in point to point personal transport. If taxi's provided the same level of service I would happily use them, but they don't.

I know when I get an uber or uberX that the car will arrive when it's ordered, the driver will be courteous and have a certain level of hygiene and the car will be well presented and clean.

I know that if I order a taxi it will arrive "first available" which could range from 1 minute to 45mins or never turn up at all, the driver while generally polite won't be nice and the level of hygiene/cleanliness is normally low.

It's my choice to chose my transport and i chose to do it with a quality service I can rely on. This is not NSW taxi drivers, its Uber.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I have never been made to feel guilty for a short fare (only going a few minutes down the road) unlike most journeys I've had with regular cab drivers.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Daley,

I am an uberX rider and a resident of Maroubra electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

Sydney taxi's are a disgrace and credit card fees are so high it can't be legal. I blame the state government for letting a public service be so awful and can only imagine what tourists think of their first impression of Sydney. Taxi drivers won't pick me up as I live 5km from the city. Is this fair??

I look forward to hearing from you.

Dear Minister,

I don't want you to ban UBER because to put it bluntly, It's just a better service than Taxis.

- It's cheaper
- It's safer because the whole ride is tracked and the drivers are all rated
- Drivers get rated by passengers so it's more accountable.
- At 2 am (taxi changeover time) you can't even get home because no taxi will pick you up. That was until UBER started.
- Taxi drivers will wind down the windows and see where you want to go before they let you in the Cab... that has never happened to me on UBER
- Even if the price was the same I would still prefer to use UBER because it's just a better service.

Dear Mr Park,

The below email could not have voiced my experience any better!! Please take note and don't allow the taxi industry to crack it just because there is change in the air. That's how it goes. New technology creates new business models and old ones have to change. They might go down kicking and screaming but in the long run, consumers will choose customer service, price and speed.

--

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Hi Attorney General,

Apart from the standard response you will receive from uber I wanted to say in my own voice that I cannot believe the taxi industry is trying to stop me from choice and from saving and from service. Kodak once protested against the digital movement too and look where old photography is now. The taxi industry is so intent on squashing competition instead of lifting their service, matching prices and basically matching ubers service. If you ban uber I become the loser, not them. This is all about the fact they don't like they have paid 200k for taxi licenses which now aren't worth as much. I don't care what they stand to loose. You will be rewarding the taxi license owners not the drivers not the consumers by banning uber. The taxi industry should simply copy übersservice model and they'd be fine. But they want to hold consumers ransom to an old system that financially benefits them only. I'm sick of it. I hope you support me by supporting ubers right to exist.

I can track my driver. I can rate my driver. I feel safe in uber. I cannot say the same for taxis who are rude, ride while on the phones which is illegal and I have to take onus to not be ripped off with them. I will always choose uber.

I am an uberX rider and a resident of Vaucluse electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales.

I choose Uber because of its customer service and reliability. I can rate drivers from 1 to 5 stars after every ride. This ensures only professional, safe, and reliable drivers drive me.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible regulations around ridesharing.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I also choose it because it's a better standard of service compared to what get from the traditional taxi service. The vehicles are clean and in very good condition and I can pay with a credit card without a 10% penalty.

Importantly as an inner city resident in Darlinghurst, the combination of Uber, taxi, GoGet, Public Transport options and user friendly walking routes enable me to conduct my daily activities both professional and private without the use of a car. In fact 4 years ago I got rid of it and have contributed voluntarily to a cleaner Sydney. Such services are a part of making this possible.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Do not take away the laws all cabs have had to abide to because an apt makes us all a cab driver/ small business

Hey Jamie,

I have already emailed you about this subject. Something I am passionate about. My business is software publishing. (Redacted) is the company, our major product is Quickbooks. For years we enjoyed a duopoly with MYOB then along came the Cloud and Xero. We have had to make some major changes in order to survive but rather than complain to the government we adapted. No business has a right to survival, particularly the NSW taxi business, for years (redacted) monopoly so strong he could charge a 10% premium for credit and even debit card use! There is no other business on this earth that does that.

Along comes the market disruptor Uber. A breath of fresh air on a very smelly, expensive, monopolistic, inefficient, unprofessional and wholly unaccountable business environment and what do they do? Cry foul to the government. What should they do? Adapt, improve and listen to the customer.

The rest is from Uber and it is entirely valid. Please do not let this service be govermentised away or bureaucratised out of competitiveness. It works perfectly the way it is.

Your strong supporter

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I have had nothing but bad experiences with rude, aggressive taxi drivers who won't take a \$15 fare or chat on their phones the whole ride or who don't show up at all.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

Further to what appears below - Uber provides a much better service than Sydney taxis. I feel safer and much more confident that the driver knows where he or she is going and won't try to rip me off. Uber is also much more reliable than the taxi service. My latest attempted use of the taxi service demonstrates this - I booked a taxi for the airport the night before - it did not arrive on time. Several phone calls and 45 minutes later still no taxi. It never came. I called Uber and it was there in 4 minutes. I never heard anything back from the taxi company. This city needs Uber. I agree with all of the comments below except the bit that says taxis are a great service. They are not - nine out of ten people on the street would tell you that.

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of North Shore electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

- I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.
- It is reliable. Typically, I never wait more than 4 minutes for a ride.
- It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I would like to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

Further, I do not understand why a car that is safe enough to carry me and my family should not be deemed safe enough to carry other passengers for a fee.

Congratulations on the very good work that you and your Government are doing on many fronts. I am especially proud to call Mike Baird my Premier.

I look forward to hearing from you.

Dear Mr Greenwich,

There's a stock letter that follows this, but I want to add my own words.

We live in a share economy. It stop us having to produce new resources when we can share the ones we already have. It saves the planet and creates community.

The shared economy is here to stay. Uber works because it's a better service at a cheaper price. It's safer, more convenient, cleaner, less extra charges, easy to use and relies on community feedback. Even legislating against Uber won't kill the share economy. This is here to stay. Action by drivers should be seen for what it is: the death rattles of an industry that doesn't give consumers what they want. It's the taxi industry Kodak moment.

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Daley,

I don't use traditional taxi services because they are too expensive and arrival times are unacceptable, it is a broken service I've been waiting up to an hour for a taxi in Maroubra and anytime I actually get one i feel ripped off. on more than one occasion the drivers tell me they don't make adequate money to make a living and they work an unsafe amount of hours in 1 shift. As a passenger I feel unsafe with a tired disgruntled employee as my driver.

So I am uberX rider and a resident of Maroubra electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I don't think there's any doubt about why services like UberX are so popular. It's safe, reliable and affordable. Some of my friends use UberX to get home at night in cases where they wouldn't have taken a cab before - I think that's a pretty powerful statement about its value. Consumers are entitled to the freedom of choice and competition and the government should protect this.

There has been media attention to the plight of cabbies, so, let me just say this. Disruption is part of progression and while we can all empathise with how difficult disruption can be, if it's not this, it'll be something else, if it's not now, it'll be tomorrow. Historically, technology has created more jobs than its destroyed and it has always benefited the people on the right side of change rather than the people stuck in the past.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review that will protect consumer rights and show that NSW is serious about advancing into a better future.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Kamper,

I am an uberX rider and a resident of Rockdale electorate. As a consumer I should be able to pick who I use, not be forced into a more expensive option!

Even though it shouldn't be an issue, as a young female I feel safer with uberX. All drivers are vetted through rigorous safety checks, and nobody is a stranger. If I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live. UberX is far more user friendly and should be forcing the taxi service to change, not the other way around!

It is reliable. And I can see where my driver is, I'm not waiting over 5 minute's. I don't want to be stuck somewhere late at night because my ride is late.

And finally it is affordable. I'm in the middle of my postgraduate degree and paying upfront, uberX is a cheap way to get home late when needed.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are NOT all great services and I want to be able to choose how I get around my city - taxi's are a disgrace, over priced, bad service is the norm, taxi men often take the longer way.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I rarely wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate.

For decades the taxi industry has had the benefits of government protection.

The consequences have been grumpy drivers, grubby taxis and under investment in technology.

Contrast this with the service from Uber - where the drivers are friendly, the cars are nicer and technology improves the experience by:

- being able to track drivers on approach; and
- avoid having to fiddle with cash or credit cards at the end of the trip.
- the app tells me who my driver is and what car I should look for
- it also tells me what other riders have rated them;
- if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

(redacted)

PS. In addition to Uber's rote message above (which we agree with entirely) our hope is to see the government help the taxi industry adapt to the modern realities of what consumers expect of them, rather than help them stifle progress and innovation to the ultimate detriment of the people of Sydney. Given your track record of supporting the needs of your electorate over political interest groups we hope you will agree.

Dear Mr Greenwich,

Just wanted to drop a quick line to say über is amazing.

I've used it 107 times in the last 10 months.

It's saved me lots of money.

Where I work in Alexandria is near impossible to get a taxi, as they wont pick-up in that neighbourhood.

Uber to the rescue.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate.

I choose Uber because I feel safe. Honestly, as a teenager and young adult in Sydney I often chose to walk, bus and train around Sydney because I couldn't afford any safer alternatives. Taxi fares weren't an option unless I could share them with someone else. I would lie to my mum and tell her I got a cab home because I knew she was concerned, when I would actually get a bus and walk at all hours of the night.

Uber is a safe and affordable alternative to taxis.

It's also great that I don't need to have cash or my bank card on me at the time in order to pay (and that I don't get charged a 10% surcharge when I do pay by card). It's also great that I can split the fare with friends.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

It is time for the Government to stand up for what the people of New South Wales want.

I look forward to hearing from you.

Dear Attorney General,

I am an uberX rider and a resident of Vaucluse electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I trust Uber. I left my wallet in an UberX last week, the driver kindly rang me and drove back the next day to deliver it to me. I cannot express the amount of times myself and friends have left belongings in other taxi companies only to be told 'nah sorry, we can't help you. It's gone' Uber is reliable, the drivers are trustworthy and honest and I ALWAYS choose Uber.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 2 minutes for a ride. Other Taxi services typically leave me waiting for over 30 minutes at a time, sometimes never coming at all, to the point where I get sick from standing in the cold.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I would genuinely be devastated, disappointed and saddened to lose UberX, to lose a company who enabled me to feel safer in this city.

I look forward to hearing from you.

Dear Mr Park,

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I have been using Uber for over 18months now, both in Australia and abroad, and I can honestly say that I would prefer Uber over Taxis any day.

I choose Uber because:

- I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.
- It is reliable. Typically, I never wait more than 4 minutes for a ride.
- It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.
- Its more enjoyable. I know I am going to get a driver who's focus is ME and my experience. Im not going to be subjected to a driver who a) does not know where they are going b) cannot converse with me to seek assistance c) drives a clean and safe vehicle.

In an increasingly competitive world, people, businesses and industries MUST evolve. Uber is a beautiful example of an idea that provides a robust service to consumers and develops a competitive marketplace that can only improve all that are invested in it. Banning or restricting parts of the system only drags it back into the "old world" that in this instance will continue to line the pockets of those who have a strangle hold on the industry, whilst impoverishing the users and drivers.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city. Giving in to pressure will only keep Australia in the dark ages and prevent any local initiatives from emerging.

In the wise words of Albert Einstein "We cannot solve our problems with the same thinking we used when we created them".

Lets not handcuff us to the past. Lets look forward. We will all be better off in the end.

I look forward to hearing from you.

Dear Ms Leong,

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

As a woman, I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

It is fair. The route is predetermined. The driver cannot ignore my directions or drive a long difficult way to bump up the fare.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of North Shore electorate.

I have only ever had great experiences with uberx - unlike taxis. I have felt extremely unsafe on several occasions with taxis. I have contacted the police twice due to inappropriate taxi driver. One time, the taxi driver sped off with me in the front seat when all my friends had jumped out of the car. Another time, a taxi driver held his fist at my face because he did not want to take me to where I asked him to drive me and he tried to kick me out of the car.

Taxi drivers are, more often than not, extremely rude and aggressive. They also filter their customers - for example, they ask where I am going before I get in the car. Some say it's too far away and others say it is not far enough.

Other taxi drivers have charged me \$45.00 to go from the Opera House to my home in Neutral Bay. There was no traffic.

I always avoid taxis and hire cars because they are expensive, I do not generally feel safe and there is no value for money. This upsets me greatly.

Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

- I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.
- It is reliable. Typically, I never wait more than 4 minutes for a ride.
- It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of North Shore electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

More often than not, UberX drivers are happy to drive me from Point A to Point B and they treat me with respect. They enjoy the job they are doing and make me feel comfortable. I have had horrible experiences with NSW Taxi Drivers and am often scared to ride in Taxi's due to the drivers' aggressive and angry nature - it's not nice at all!

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Greenwich,

I am an uberX rider and a resident of Sydney electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I have had multiple bad experiences with taxi services here in Sydney and in one very serious instance I had to involve the taxi company hq and police. Due to poor laws, I could not take it further due to lack of regulation on the taxi companies. It was clear to all educated people that I was in the right and was hard done by. However with Uber, their support is exceptional, quick, reliable and fair.

I have also on a regular basis been refused by a taxi because the fare was not big enough. This is wrong.

I have also been taken advantage of for been a foreigner. This looks bad on Sydney and such experiences will make Sydney an unattractive destination for tourists. It only takes one instance. Now I am resident and knowledgeable of Sydney roads, I know when they are wrong.

The uber drives take pride in their job. I don't have to worry about been taken advantage of by a taxi. Before a taxi man asked me where is circular Quay after driving me in the wrong direction before realising that I wasn't a tourist and knew the route. BTW at the time my office was located there. Circular Quay is a landmark of landmarks , recognised globally. If you don't know where this is, acting stupid is not an excuse, you are just ignorant.

If you rip people off with dodgy fares and poor routes, you are as good as a thief. The laws protect the taxis so why do they care.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I 110% support uber and will happily boo the taxi strike here in Sydney. If necessary, I am happy to protest in support of Uber.

I look forward to hearing from you.

Dear Mr Notley-Smith,

I am an uberX rider and a resident of Coogee electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. Far safer than in a taxi. Not only because all drivers are vetted through rigorous safety checks, and nobody is a stranger, but I can read previous reviews of the driver, I can choose to share my journey publicly and share my location in real time with friends and family. If something went awry, I now have the name, contact number, car type and number plate of my driver that I can hold responsible.

This compared to a taxi where, on countless times I have been taken on a longer route just to get a larger fare, I overhear conversations of the drivers while they talk on the phone as if I am not even there, they speed, drive recklessly and on several occasions, I have had a taxi driver speak extremely inappropriately to me in a sexual manner, including asking me to swap places with his wife. I have also been ceremoniously kicked out of a taxi despite having done nothing wrong except that my phone was going off too loudly and still had to pay. Nothing like this has ever happened with on all the times I have ridden with Uber.

It is reliable. On average, I never wait more than 4 minutes for a ride that is right out my door. On countless occasions, I have waited on average for 20mins for a taxi that may or may even be on it's way.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none. On average, a local trip can cost me as little as \$11. The starting fare for a taxi is \$3.20, before I have even left my street....as an entry level job salary earner, it make financial sense for me to choose the cheaper option. The fact that it is a better service and I feel safer is just icing on the cake.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. I haven't met a single friend (or any person for that matter) who said "oh no I choose taxi's every time." They are losing money and business over their own incompetencies. Taxi drivers have had it too easy and taken advantage of us for too long and now they are paying the price.

It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Attorney General,

I am fed up with my Country and state not embracing and encouraging the digital age. Disruptive technology is here to stay and will provide us all with many benefits. To hinder progress helps no one I am sure you and your colleagues have the moral fortitude to ensure we are not all disadvantaged by a narrow sector of society seeking to protect their vested interest.

I am an uberX rider and a resident of Vaucluse electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Ms Leong,

First of all thank you for your forward thinking leadership in our community, you have been an excellent voice for our community. I have filled an online form that has sent this email to you, so I have no doubt that you will have read the text below.

So I decided to write something more personal on this topic as I feel very strongly about this company and the taxi industry in general. I am a user of Cabcharge (regular Taxis for work), UberX (for personal journeys) and an Uber Driver (for some part time work when my business is quiet).

The shake up in the industry is revealing the stranglehold that Cabcharge have over the state government and their fear that there could be some viable competition. As a user and contributor to the service I can confidently say that Uber provide better service, a safer environment and the reason for the concern from the taxi industry is because they do not offer the same level of service.

Cabbies are often dangerous drivers, unfriendly and sometimes aggressive, they are all of the things that they say happen with Uber. Simply, the Uber ratings system does not allow for bad drivers and bad people to remain in the system, if your rating falls below 4.5 stars Uber will call you in for a meeting and if needed they will lock you out of the app. This means that, as a driver, you must work hard to provide good service to ensure that you can keep earning money. You also need to pass a criminal history check and maintain proper insurance for your vehicle. People like it, they really enjoy that there is some competition and potential change in an industry that is in desperate need of a shake up.

I would love it if you could support this system, and help it to flourish even, by representing the many people in your electorate who use and love this service. The only way that the taxi industry can respond to the threat of Uber is to do a better job, not force out the competition using their massive influence in government.

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and

advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Minister,

I am an uberX rider and a resident of New South Wales. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

They are clean, friendly, drive safely and provide a tracking app as well as a simple way to provide feedback to the company in case of a bad experience. The billing is also simple and easy and is great for tax purposes. Too many times I have flagged down a standard Sydney taxi to find it decrepit and unclean and then been subjected to a driver with bad BO, talking on the phone and leering at me. This happens around 50% of the time and is a real shame for the drivers trying to do a good job, in a clean car with good manners and driving skills. Unfortunately there aren't enough of these 'good' drivers on the road, so I use Uber instead.

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Mr Hoenig,

I am an uberX rider and a resident of Heffron electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I choose Uber because:

- The drivers are amazing, friendly and provide excellent customer experience. I always feel safe.
- Uber is very reliable and I rarely wait more than 4 minutes for a ride. I would prefer to call an Uber than ride a taxi who often refuse to take me home because I live too close!
- It is affordable

and I don't have to worry about having cash. Many taxi drivers claim their EFTPOS machines don't work so it is always a hassle to make sure I find a taxi driver that has EFTPOS facilities working. With Uber, I pay with my credit card and all the transactions are tracked.

- Uber is providing customers with OPTIONS. Have you ridden in a taxi within Sydney CBD? Not only are the conditions appalling, but the customer service is non-existent. Drivers often take the long route and when questioned, they always have an excuse.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Dear Ms Leong,

I am an uberX rider and a resident of Newtown electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

I feel that the ongoing issue with Uber in Australia highlights an ongoing problem with the taxi industry and its inability to cater for consumer demand. I feel the rise of Uber has arisen due to an arrogance of the taxi industry in the face of widespread disapproval from consumers at their poor service. The issue highlights that yet again it is consumers that have power over markets and I feel it would be a tragedy if government interference due to lobbying would allow an industry that clearly doesn't listen to its consumers continue.

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you,

Dear Mr Park,

I am an uberX rider and a resident of Balmain electorate. Taxis, hire cars and ridesharing are all great services and I want to be able to choose how I get around my city.

Besides the below message auto generated – if a taxi won't take me home because it's too SHORT a ride – or then drives badly/ slow etc because they CAN Uber drivers do their job they Drive and get me to where I need to go. |The savings helps too cause, with rental prices and lower/ mid income – they just work and help us all out!

I choose Uber because:

I feel safe. All drivers are vetted through rigorous safety checks, and nobody is a stranger. The app tells me who my driver is and what car I should look for. It also tells me what other riders have rated them. Importantly, if I choose to, the app allows me to share my journey with friends and family in real time so they can track my journey live on a map through the GPS system.

It is reliable. Typically, I never wait more than 4 minutes for a ride.

It is affordable. It is about 30-40% cheaper than a taxi and the customer service is second to none.

I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want. Ridesharing is a safe, reliable and affordable option and I want it in my city.

I look forward to hearing from you.

Hi,

I am a regular uberX user and a resident of Vaucluse electorate.

I love Uber because:

1. I feel safe (as does my wife and kids). UberX drivers have always been polite on the 67 trips I've taken so far, and I've never felt in danger once. With NSW taxis I've used over the past decade, >50% are rude, >25% are actively racist, and a couple have been aggressive. One threatened my wife about 6 months ago (we reported it to NSW Taxis - nothing was done about it) and neither of us have used taxis since
 2. It's convenient - the payment and ordering system is much better than any taxi service, and there isn't a ridiculous 10% charge for using a card
 3. I like the fact that it doesn't put any additional cars on the road - using underutilised assets which exist already - unlike taxis which mean there are 5000 cars driving about in Sydney which don't need to be there
 4. I like the fact that 80% of the money is going to the driver rather than a corporate taxi plate owner getting c.50%
 5. I don't have to give them directions! Unbelievable as it sounds, taxi drivers seem to rarely have either sat nav or any idea where they are going. So they ask the passenger to direct them! I have recently been in a taxi (in Melbourne) where he had to stop to look at the map! Obviously this doesn't happen with Uber
- I have some sympathy for the individual taxi drivers who were sold a share in a promised monopoly which is now being eroded, but I don't think that protecting an outdated (and unnecessary) monopoly is the solution. Perhaps the govt could buy back some of the licences from taxi drivers who recently acquired them? Only for the drive owners obviously, not the investors...

Either way, whether it's uber, car sharing or something else, the traditional taxi model is dead, and we as a nation are going to look very backward if we spend time and money legislating to protect it in a futile cause (see the Australian car manufacturing industry, climate change denial, gay marriage for case studies of how this works out for Australia on the world stage...)

Dear Ms Leong,

I am a regular uberX user and a resident of the Newtown electorate. As my representative, I urge you to support ride sharing for the following reasons:

1. I feel safe and the cars are always in good condition. UberX drivers have always been polite on the many trips I've taken so far, and I've never felt in danger once. With the NSW taxis I've used over the past decade, >50% are rude, >25% are actively racist, and a couple have been aggressive. I was, in fact, blatantly over charged by a taxi driver last night (\$27 from CBD to Surry Hills) who had "already cleared the meter" when I disputed the fare. NSW taxis are a disgrace. I am regularly rejected by taxis on the rank at Chiefly Tower after 12.00am at night because they do not want to make the trip to Surry Hills. I have reported a number of incidents but the NSW Taxi council is unresponsive as it's more focused on protecting its inefficient monopoly than improving its service to compete
2. It's convenient - the payment and ordering system is much better than any taxi service, and there isn't a ridiculous 10% charge for using a card or other fees or charges
3. It doesn't put any additional cars on the road - using underutilised assets which exist already - unlike taxis which mean there are 5,000 cars driving about in Sydney which don't need to be there
4. I like the fact that 80% of the money is going to the driver rather than a corporate taxi plate owner getting c.50%
5. I don't have to give them directions. Unbelievable as it sounds, taxi drivers seem to rarely have either sat nav or any idea where they are going. So they ask the passenger to direct them! I have recently been in a taxi (in Melbourne) where he had to stop to look at the map! Obviously this doesn't happen with Uber

I have some sympathy for the individual taxi drivers who were sold a share in a promised monopoly which is now being eroded, but I don't think that protecting an outdated and inefficient monopoly is the solution. Albeit, it is unreasonable for a taxi driver (or owner of a taxi licence), as a business owner, to rationally expect that there is no risk to their invested capital - particularly when operating in a highly regulated industry - and think that it will increase in value in perpetuity. That is not how a free market economy works.

Either way, whether it's uber, one-way car sharing or something else, the traditional taxi model is structurally flawed, and NSW are going to look regressive if we spend time and money legislating to protect a rent seeking monopolist because we can't unwind the position.

Dear Mr Park,

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I want to know that you will support me, as my Member for Parliament, and advocate for sensible, safety based ridesharing regulations to be the outcome of the New South Wales Review.

Hundreds of thousands of people are choosing to ride with Uber. It is time for the Government to stand up for what the people of New South Wales want.

Ridesharing is a safe, reliable and affordable option and I want it in my city.

Simply because a system is in place doesn't mean it shouldn't be the only service available. That is how our society grows - we are constantly innovating, improving on the old to make our lives better tomorrow. The traditional taxi services do not simply deserve my patronage because they exist. They must either provide a service that can compete or they must get out of the game.

I look forward to hearing from you.