

From: Cameron Nadi
To: [pointtopoint](#)
Cc: [William Harris](#); [William Harris](#); [Simpson, Phillip](#); [Carlin Rookes](#)
Subject: Urgent Attention: Submission
Date: Thursday, 4 May 2017 12:30:00 AM

Dear Sir/Madam,

I am writing with reference to the Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017, hereafter referred to as 'the Act'

My submission is directed specifically to **Division 3 - Section 23: Motor cycles - hire vehicles** of Part 2 of the Act (pp 18-19).

This section of the Act is archaic and in dire need of urgent attention and subsequent amendment.

Section 23(1) states the following:

"A motor cycle used as a hire vehicle must comply with the Australian Design Rules (under the Motor Vehicle Standards Act 1980 of the Commonwealth) vehicle category definition for any of the following:

- (a) motor cycles (LC vehicles),*
- (b) motor cycles and side cars (LD vehicles),*
- (c) motor tricycles (LE vehicles)."*

Firstly, there is no Motor Vehicle Standards Act 1980. There is, however, the Motor Vehicle Standards Act **1989** but this does not provide any provision for motor cycles.

Secondly, section 23(4) provides that:

"(4) A motor cycle that is an LC vehicle used to provide a passenger service must comply with the following: (a) not have a two-stroke engine, (b) not have an engine capacity of less than 500cc."

This section needs to be amended significantly, if not completely abolished from the Act. This is because two-stroke engines have been practically vanished from production for almost 20 years and substituted by cleaner, safer and more reliable four-stroke engines. A simple phone call or visit to any motor cycle dealership in Australia will attest to the complete eradication of two-stroke vehicles and so this must be factored into the language of the Act. Secondly, part (b) of this subsection is wholly contingent on part (a) as two-stroke motor cycles have a maximum engine capacity of 500cc. When this section was written, it was clear that no two-stroke engine would be permitted and so part (b) merely serves to strengthen part (a). This section is outdated and must be modernised.

I propose that a clause MUST be entered within Section 23 to incorporate the permission of Scooters and Motor Cycles with engine capacities of no less than 150cc. The language may read as follows:

Definition: Scooter - a light two-wheeled open motor vehicle on which the driver

sits over an enclosed engine with their legs together and their feet resting on a floorboard.

Proposed clause: A scooter or motor cycle used to provide a passenger service must comply with the following: (a) not have an engine capacity of less than 150cc, (b) Year 2008 or newer.

Since 2000, two-wheeled motorists in Australia have increasingly adopted scooters instead of motor cycles and the RMS can provide data that shows the doubling of scooter registrations since 2010. This surge in scooter adoption is based on the following reasons:

- Motor cycles have manual transmissions and are harder to learn. Scooters have automatic transmission and are easier to learn;
- Scooters are more fuel efficient;
- Scooters have lower engine capacities (typically between 125cc to 650cc compared to 150cc to 2000 cc for motorcycles) and are therefore safer to the drivers, passengers and pedestrians as high speeds are not reached;
- Scooters have reduced noise nuisance due to quiet exhaust systems;
- Scooters are great for city commuters because of their size and maneuverability due to a smaller wheelbase;
- Scooters have greater storage capacity (large under-seat storage compartments)
- Scooters are more affordable

Sydney has the unenviable title as Australasia's most congested city. Infrastructure Australia has warned that traffic congestion will cost Australia \$53 billion a year in lost productivity by 2031. More people are commuting greater distances and the clogged roads are hurting the economy and the lifestyles of city dwellers. In city after city, from Singapore to Stockholm, there was a common experience: building additional roads doesn't reduce congestion – because more drivers get on the road, leaving congestion the same.

The best solution to reducing traffic congestion in Australia is - Scooti. Scooti (www.scooti.com.au) is a private Australian startup that my business partner, William Harris, and I built which provides ride-sharing services to Australians using scooters and motor cycles (excluding sports and trail bikes). Our IT Architect, Carlin Rookes, has developed a highly innovative and revolutionary mobile application for Android and iOS that connects passengers with drivers in a simple, affordable and safe manner while creating cleaner and greener cities coupled with creating thousands of new jobs for the economy. Our business has every legal, operational, and financial aspect covered and the Australian public is demanding our launch with thousands visiting our website and enquiring our launch date. Scooti is the first of its kind but will be cloned by competitors similar to how Uber was cloned by GoCatch and Hop.

In fact, we planned to launch Scooti in October 2016, but correspondence followed by a meeting with the office for the Minister of Transport NSW on December 5th 2016 stymied our launch. All Scooti stakeholders have patiently and enthusiastically awaited the proposed Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017, but the aforementioned section that I have outlined still remains severely unsound, outdated and in dire need of an amendment.

What I have proposed is practical, logical and modern submission and with your cooperation, will lead to a Point to Point Transport Act that is indeed relevant, modernised and sound. Additionally, the Act must incorporate the business of Scooti as it represents the present and future of ridesharing transportation in NSW and the best solution to our traffic congestion dilemma. Australia wants and needs Scooti to operate!

I urge you to contact me via phone or email and would be happy to demonstrate our exceptional technology with my team in person and answer any queries that you may have.

I look forward to your response.

Sincerely,

Cameron Nadi (LLB, BCom)

CEO and co-founder

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