

FEEDBACK ON POINT TO POINT REGULATION 2017

ISSUE 1

Section 22 regarding vehicle signage seems to contradict itself. Clause (2) states that the driver is responsible but this conflicts with clause (5) which says the booking service is responsible. While the Booking service should be responsible for providing the signs and informing the driver the driver is clearly the one responsible for making sure they are displayed.

ISSUE 2

Section 24 (1) seems to mistakenly say “third party property” and seems it should say “third party”, there is no way a property policy would be for \$5M especially given 24 (2) is also about third party property also.

ISSUE 3

Section 34, describes foreign entities that would be able to operate a booking service, this is of concern for the following reasons:

- a) Enforceability against a foreign entity.
- b) Avoidance of Australian Taxes is bad for Australia
- c) Avoidance of Australian Taxes gives foreign operators an advantage over Australian businesses.
- d) Naming only foreign entities disadvantages Australian businesses

ISSUE 4

Section 91 states that Carpooling is not a passenger service and cannot be connected to a Booking Service. This lack of regulation is dangerous to passengers and encourages overseas websites to enter the market and provide unregulated services. Carpooling should therefore be permitted “not as a passenger service” AS LONG AS THE TRIP IS BOOKED THROUGH A BOOKING SERVICE, this would provide some protection to passengers as far as record keeping is concerned rather than overseas websites providing unregistered carpooling matching. The regulation as it stands provides no protection to travellers in rural areas and despite technology being available returns us to the dangerous days of uncontrolled hitch hiking. As a booking service we can provide the protecting for a modest booking fee and also provide a means whereby a deposit for the cost sharing of the journey could be paid on line in advance by credit card. This facility does not take away the freedom of travel just provides a level of safety.