

**From:** LimousineLine Bookings  
**To:** [pointtopoint](#)  
**Subject:** Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017  
**Date:** Friday, 5 May 2017 12:13:32 AM  
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Dear Commissioner,

Having operated Hire Cars and Tourist Vehicles since 1995 & Taxis between 1988 & 1995, I feel that our industry is being sent down a path that will restrict consumer choices, and HAS restricted the growth of my business.

The Hire car industry is small in number, probably making it an easy target for other competing point to point service providers. One of the biggest issues I believe is the continued access for HC's to Bus & Transit Lanes post 2020. I have been informed that this restrictive law is being brought into play because of congestion on Bus & Transit Lanes. I tend these points

- Removing of HCs from Bus/Transit Lanes reduces choice, forcing time poor passengers back to unpopular Taxis and their questionable standards, the only point to point provider with Bus Lane access.
- Removing HCs from Bus Lanes will not greatly reduce congestion on those lanes, we are the smallest Bus Lane users in number
- Hills District to CBD Bus services are NO LONGER a strategic PRIORITY BUS ROUTE, as stated in the NSW Transport Master Plan
- Sydney Metro North West Rail Line completion is 2019 – This will **REDUCE** dozens of Hills Bus Services per hour – the source of the **GREATEST** Congestion
- Taxis are being given an unfair business advantage as the only point to point service provider with Bus/Transit lane access. Hire Cars have been around as long as Taxis. Our clients are just as important and typically have greater roles in the Corporate world to carry out requiring our specific personalised services. If bus lane congestion is the real issue then TAXIS should be removed from them to ensure a favourable traffic outcome.
- The advent and growth of Rideshare passengers, at a lower price point, have riders that ACCEPT the fact they don't have access to Bus Lanes. Rideshare's spectacular growth is further reducing the number of TAXI trips on Bus Lanes.
- A campaign galvanising our North Shore & Northern Beaches clients who are typically strong Liberal supporters will not provide the Liberal party with ANY benefits – prepare for a drop in political support.

**Sustainable Transport – Only Sustainable if part of a sound business model.**

- I operate ZERO & LOW EMISSION TRANSPORTATION (Tesla EV, Euro 6 and LPG Hybrid Vehicles). This huge investment in lowering my client's carbon footprint will not be sustainable if established clients no longer choose our services due to avoidable traffic delays.
- Western Europe & Cities around the world such as [Curitiba, Brazil](#); [Bogota, Colombia](#); [Portland, Oregon](#); and [Vancouver, Canada](#) have consistently included sustainability as a key consideration in transport and land use planning. Even Victoria to our south passed - the [Transport Integration Act 2010 \[55\]](#) - to compel its transport agencies to actively consider sustainability issues including climate change impacts in transport policy, planning and operations (Wikipedia)
- Federal, State and Local Governments are positively biasing policy towards Zero Emission Transportation – why is the Point to Point Commissioner negating these environmentally positive measures?
- The Point to Point Commissioner should seriously consider accelerating the use of Zero Emission public transport by allowing EV HCs continued full access to Bus Lanes post 2020. We are small in number but will provide an important catalyst for the take-up of sustainable transport

- The proposed changes will LOWER fleet utilisation through inefficiency – not a good outcome when government should be aiming for fewer registrations

### **Restrictive Business Practice.**

Having paid well above the administration cost for my Hire Car plates (\$8235 p/a each plate) for many years I DO have equity in the Industry, regardless of what I'm paying now, and regardless of it not being recognised by government. I never asked for free licences, I think that is absurd when there is a regulatory role required to be funded in the administration of the HC Industry, that no fee is collected.

At the stroke of a pen in December 2015 with NO WARNING at all, I'm told I can not expand my business and apply for more HC plates. With the loss of Bus/Transit lane access can no longer provide my clients with the full suite of services they have always enjoyed. How is this remotely fair and equitable when rideshare transport has been given NO LIMIT to the amount of cars and drivers their business can grow by?? I don't care how many rideshare vehicles there are. They operate at a much LOWER Pricepoint than Chauffered cars, sometimes using insanely small cars to transport 4 passengers (Holden Barina Spark for instance). It's fine by me that rideshare makes point to point transport more accessible to some. But WHY does the Business model of superior service, cars and experienced drivers that the Hire Car Industry represents need to be severely restricted in the face of these new industry players with NO growth restrictions??

It has been reported that Uber's driver retention rate after 12 months is as low as 4%-10%. Hire Car drivers build their craft over many years, sometimes decades and become a true service provider to clients. These proposed restrictions to the way the Hire Car Industry operates will REDUCE the number of EXPERIENCED, PROFESSIONAL, DRIVERS further. How is that a benefit to the travelling public who want this choice?

### **Potential New Revenue Stream.**

EVERY Bus lane Camera, EVERY Toll point camera through automatic number plate recognition processes breaches by vehicles. Whilst we are some years before Governments can implement real-time, pro rata billing of cars road usage through Telemetry, these existing cameras could very easily be programmed to charge a new toll for HCs & Taxis on Bus Lanes on usage basis. A HC or Taxi driver could choose to use the general traffic lanes when without a paying customer onboard or in no hurry to pick up the next passenger. This Bus Lane tolling would provide Taxpayers an increased return on road infrastructure.

### **Autonomous Transport**

If this policy is designed to "clear the routes" for the advent of Autonomous Vehicles and provide them with unfettered Bus/Transit access, then there is no need to. I have a self-driving car, it copes with human driven cars fine and updates are constantly improving its self-driving ability. Autonomous cars will integrate and help a cities cope with transport requirements better. Many small operators like myself can't wait for Autonomous cars and the opportunities they will provide. On a wider scale they WILL lower road trauma statistics, provide liberty to blind and disabled people. But it's a strange coincidence that companies like UBER, Google & Lyft have touted 2020 as their target year for Autonomous operations. It would be interesting to be informed of the meetings between the Transport Ministry and companies like Google, who as far back as 2014 briefed Australian State Governments of their progress, future timeline and regulatory support required.

It's VITALLY important for Governments to allow competition to exist, and provide consumers choices. The only people served by restricting the growth of the HC industry and it's access to Bus/Transit lanes are large App-Based transport providers that have changed the way many people book point to point transport, and who wish to simplify the remaining choices consumers have. They see their growth maturing so would be HAPPY to see personalised, small niche transport operators like myself severely delayed and restricted in daily operations,

Dear Commissioner, I truly hope that point to point transport policy can be formulated supporting business diversity, consumer choice and sound environmental goals.

Regards

John Aquilina

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#### **Airport Pickup Procedure**

**Sydney International Arrivals:** Your Chauffeur will meet you inside The Arrivals Hall holding a sign board.

**Domestic Arrivals:** Please turn your mobile phone on as you leave your aircraft. Your driver will be in touch regarding the pickup point.

If the driver cannot be located, contact our office on [REDACTED] immediately. Should you leave your pickup location without the driver it will be deemed as a full cancel and charge unless you have been instructed to leave by our office.

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