Dear Sir or Madam

We are a small business providing a premium private hire vehicle service to our clients. These include corporate, professional and business people with transfers from and to the International and Domestic Airports amongst other services. Our clients require us to reach their destination in the safest most efficient and prompt way.

**Hire vehicle signs and markings**

Clause 22 is a new provision relating to signs and markings for hire vehicles. With the eventual abolition of hire car ‘HC’ plates and the introduction of a large number of ridesharing vehicles, NSW Police and authorised officers expressed concern about their ability to identify hire vehicles for enforcement purposes. Accordingly, the proposed Regulation provides that a driver of a hire vehicle (other than a motorcycle) must display a retroflective sign when the vehicle is being used to provide a passenger service. The sign must make it apparent that the vehicle is a hire vehicle, such as displaying a business logo. … The provider of a booking service is the responsible person for all aspects of the safety standard in the clause including the requirement for the driver to display a sign indicating that the vehicle is a hire vehicle.

We agree completely with the concerns expressed by NSW Police and authorised officers as well as our clients regarding the abolition of the HC plates as these provide an unequalled means of identifying hire vehicles.

We disagree completely with the proposed regulations that the responsibility of the identification of a hire vehicle (HC plates) moves from the NSW authorities to rely on the driver to display a retroflective sign.

We understand a fee may be necessary for the use of the HC plates. We also believe changing HC plates to another type would cost the NSW government unnecessary expense.

**Appendix 4: Consequential amendments to related regulations**

Proposed amendments to the Road Rules 2014

Consequential amendments are required to the Road Rules because the relevant provisions of the Passenger Transport Act 1990 are to be repealed as a result of the reforms. These include:

- Access to special purpose lanes and other exemptions for hire vehicles
- Child restraints and seatbelts
- Changes to definitions to ensure consistency with other Acts.

Under the Road Rules, taxis can access special purpose lanes such as bus lanes and are exempted from a number of other road rules. The current definition of 'taxi' in the Road Rules includes a private hire vehicle. Under the Point to Point Act, the definition 'private hire vehicle' will not exist. Instead, the term 'hire vehicle' is used and this includes both traditional private hire vehicles and ridesharing vehicles.

It is proposed that ‘transitioned’ hire vehicles (for which a private hire vehicle licence was in place in December 2015 and to which is fitted a ‘HC’ number plate) will retain access to special purpose lanes including bus lanes (Road Rule 158) and transit lanes (Road Rule 156(1)(a)(i)) while the vehicle is being used for the purpose of providing a passenger service until 30 June 2020 to give the existing
Having access to Bus Lanes has been instrumental in fulfilling the services we are contracted to do. As you are well aware peak hour traffic can add valuable time to a journey. These changes would have a significant impact on all traffic. Having access to Bus Lanes has been imperative in servicing our clients' needs and requirements and hence securing our livelihood.

Professionals travelling from overseas to perform their duties with their organisations here in New South Wales have strict deadlines to adhere to and rely on us to provide our service promptly and efficiently. Our business would suffer greatly from the added travel time.

Also, in these very competitive times it is necessary to provide our service to numerous clients each day, for that too, we rely on bus lanes to help us reach the following destination and client in the fastest most efficient way. Losing clients would be detrimental for our business.

Creating a more level playing field is a major step forward in these times of change however there is a market that requires fast and efficient service that does not have the time for delays in traffic. We live in a Global Economy; organisations could easily take their business elsewhere because of these detrimental changes which would be damaging to the long term economy of NSW and Australia.

**We urge you to reconsider these detrimental changes for the long term wellbeing and existence of our industry.**

Kind regards

Ernesto Zambrano and Eliane Quintana
Hire Car Operator

Eliane Quintana
Make-up & hair artist
M: Commercial in confidence
E: Commercial in confidence

And

**Limousines Latitude Z. T.**
Transfers, Conventions, Special Events & Tours
E: Commercial in confidence
M: Commercial in confidence