Thank you for the copies of the Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017 and accompanying Regulatory Impact Statement.

I would submit the following:

(1) The Regulations have been drafted without the benefit of any survey of Taxi and Hire Car Operators and Drivers ever having been conducted. Such a survey could have sought to raise and address issues as to health and safety, superannuation, taxation, employment status, etc. That is to say work conditions for drivers and operators in general could have been broadly addressed.

(2) The Taxi and Hire Vehicle industries remain, in my view, totally bereft of the concept of merit.

Specifically:

(a) Clause 22 requires a retroflective sign to be displayed by Hire Vehicles. Will this Clause be in effect for those vehicles still carrying HC number plates until such time as the issues concerning HC number plates are resolved?

(b) Clause 52 requires fare estimates to be provided and also provides penalties for breaches of S 79 of the Point to Point Transport (Taxi and Hire Vehicle) Act. We note that SACL’s BLRS system charges for Hire Vehicle pick ups within the Sydney Airport precinct can vary, in some instances significantly. For example $16-$34 instead of $8 if there is any miscalculation as to aircraft landings and/or passenger movements and $99 if there is a problem with E-Tags being read on departure from the pick up zones provided at T2 and T3. T1 is on a similar principle but separate scale. SACL do not provide any information to Hire Vehicle operators and drivers in respect of aircraft landings and movements nor is any information provided to drivers nor passengers upon departure from same pick up zones. The RMS have confirmed to me that it takes up to 2 business days for their E-Tag records to be updated and knowledge of those actual charges becoming available. The difficulty in providing reasonable fare estimates is obvious.

Certainly SACL’s BLRS system sits awkwardly and cross-grained with Clause 52 and Section 79. The non-disclosure of actual amounts charged by SACL to drivers and customers is an issue as is the impediment to enforcement of Clause 66, 67 and 85.

(c) Clause 67’s title "Driver to be hired only at specific zones- Sydney Airport precinct and other airports" is ambiguous as to Clause 85. While the body of Clause 67 appears sound, the title to could be amended to dispense with the ambiguity which implies that a driver of a passenger vehicle can be hired within those specific zones.

(d) Clause 68 requires drivers to remain with their vehicles. As to Clause 68 (1), what guidelines are there, if any, to "reasonable excuse"? As to Clause 68 (2) (a), does loading of luggage or goods extend to within the terminals? For example mothers travelling with infants and burdened with significant amounts of luggage at both T2 and T3.
Thank you and Good Luck with with, fingers crossed and all that.- Chris Gehrig