

From: [REDACTED]
To: [pointtopoint](#)
Subject: Point to Point Transport Regulation
Date: Tuesday, 9 May 2017 9:42:51 AM
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Dear Commissioner,

I write to make a submission regarding the new proposed Point to Point Transport Regulation. My business is only relatively recently accredited and so I write without the depth of experience and knowledge that other operators will be able to. I hope that my submission will be read and considered in this light.

I would first like to say that I am a registered member of the New South Wales Hire Car Association (NSWHCA). I support everything that the NSWHCA have said in their submission on the proposed Point to Point Transport Regulations. The points that I make below may be repeating some points that the NSWHCA have made in their submission and may be excluding other points that the NSWHCA have made. The exclusion of any points that the NSWHCA has made in my submission should in no way be taken as an indication that those points are any less important to me, but rather that I feel that they have been better argued in their submission than I could do myself and that there is nothing further that I can add to them.

The venture that I have started is my first foray at running a business and being a business owner. Until this point, I've been a permanent, full-time employee in the corporate sector. I am excited to be working for myself and at the prospect of building a business, but I'm also extremely anxious at the same time, particularly as I'm entering an industry which, on first appearance at least, is under attack from a regulatory perspective to the point where the industry's very existence seems to be no longer considered desirable by the NSW government. We've been trading for less than a year, but already I see barriers to growing my business (no more HC plates issued and now no more transfers between operators) and huge impediments being placed on my ability to generate an adequate return on my investment and to avoiding penalties for administrative compliance. I didn't expect this and I particularly didn't expect it under the watch of a Coalition government, when they have always touted themselves as being the champions of small business.

As a new player, who hasn't yet been able to afford expensive booking systems, I have some serious concerns around the onerous nature of the data capture and maintenance and auditing requirements being built in to the proposed changes. I feel that the NSWHCA's submission has covered everything that I would like to say in regard to this and offer my full support to their arguments and questions. These requirements are definitely concerning for me as a new entrant to the industry.

By far my biggest concern, however (rightly or wrongly, given my state of relative naivety), is the proposed elimination of HC number plates post 2020 and the implications that this is likely to have on both my business and my customers. Continued access to Bus and Transit Lanes is critical to the survival and hopefully future growth of my business. I have been informed that the reasoning behind this proposed new law is because of congestion in these lanes. I believe that prohibiting Hire Cars from using these lanes whilst allowing taxis to continue to do so as a solution to this issue is flawed logic for the following reasons:

- Many of my passengers who are booking either directly or with the premium ride-sharing booking services advise me that they book hire cars because their experiences with booking taxis have been consistently bad. The biggest complaints that they have are that booked taxis have consistently not turned up at the appointed time, have been poorly maintained and that the drivers are not up to their preferred standards in terms

of both safety and customer service. Often these customers are senior executives at large companies, dignitaries or business owners who are time poor and other times they are just customers who are happy to pay a premium for a higher standard of service, including the knowledge that they have less risk of being late to their destination.

Removing the use of bus lanes for these passengers is likely to be not only highly unpopular among these transport users, many of whom would be Liberal Party voters, but also place a grossly unfair impediment on hire car operators' ability to compete for business.

- Rideshare Services that have recently entered the marketplace most closely replicate the services previously only offered by taxis in the sense that riders are able to effectively 'hail' a vehicle nearby at short notice, when they are ready to travel. You cannot book a rideshare service in advance, as you do with a hire car. The fact that the lower price point level of the low-end version of these has cannibalised the taxi industry should not be considered grounds to allow the taxi industry to in-turn cannibalise the hire car industry, which these proposed regulations effectively do. Low-end rideshare passengers also accept that they don't have access to bus lanes and the growth in popularity of these services is already effectively reducing congestion in bus lanes and will continue to do so more and more.
- Currently Uber offers 5 different levels of service, giving customers plenty of choice, depending on whether they want to get to their destination cheaply and potentially more slowly or (for a premium) in more comfort, (arguably) more safely and potentially faster. This choice is good for the community at large and there doesn't seem to be any good reason for reducing this choice other than to accommodate lobbying by the taxi industry.
- The Sydney Metro North West Rail Line is due for completion in 2019. This will significantly reduce the number of Hills Bus Services along the M2 and into the City and thus will significantly reduce congestion before July 2020 anyway.
- Hire Car operators are the smallest Bus Lane users in number and removing HCs from bus lanes will not significantly reduce congestion anyway.
- Non Bus and Transit Lanes are already far more congested than Bus Lanes are themselves! If every Hire Car on the road today is forced out of Bus and Transit Lanes then our roads will become even more choked with cars.

On the first point, above, it is concerning that many of the customers of Hire Car operators don't seem to be particularly aware that they are about to be blind-sided by these regulations and forced back to taxis for a chance to be able to get to where they are going quickly. I feel very strongly that the Government needs to make a far more concerted effort to advertise the proposed regulatory changes to Business Executives, Medical Practitioners, the Legal fraternity, Business Owners, Celebrities and other major users of chauffeur driven services in order that they be given the opportunity to voice their own opinions.

My business only operates ZERO EMISSION, electric vehicles. These vehicles are expensive and I have invested a significant sum of money in purchasing them because I believe that electric vehicles are the future of the transport industry. In that sense, I feel that I am very much an innovator in the industry, or at the very least an early adopter of new technology which can disrupt the market and attract customers. I believe that assisting members of the public to reduce their carbon footprints is critical for the future of our environment and also our economy. Unfortunately, however, no matter how clean and green my vehicles are, customers will not book them if they are restricted from arriving at their pickups on time or from reaching their destination on time. Governments, both around the world and within Australia, are incorporating sustainability issues into many of their policies. If my vehicles are

forbidden from bus and transit lanes and special access areas, I will not be able to attract as much business and, even if I could, I would not be able to fit as many jobs into my day as I currently can and this will massively impact on the profitability and viability of my business. I will also need to purchase more vehicles to meet the same level of demand and this can only further increase congestion on the roads.

It seems to me that there are much smarter ways to reduce congestion in Bus Lanes, if that is indeed what these regulations are aiming to achieve. Why not introduce a toll collection point along bus routes at a location where it is most essential for vehicles to be in the lane in order to avoid long delays and build in preventative measures to stop drivers ducking in and out of lanes at that point in order to avoid the toll. The harbour bridge is already structured perfectly for this and surely this couldn't be too difficult to create elsewhere. This would give taxi and hire car drivers the option of paying a toll and generating revenue for the government or suffering the traffic in a non-bus lane if they're not in such a hurry to reach their next booking.

Commissioner, I hope that these points will be carefully considered and that sustainability, consumer choice and the wider driving public will all be factored into the final policy.

Thank you for the opportunity to make a submission.

Kind Regards

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