

From: Eric KLEIN
To: [pointtopoint](#)
Cc: [REDACTED] [Simon KALIPCİYAN *Q](#)
Subject: Point To Point Transport (Taxis & Hire Vehicles) Regulations, 2017
Date: Tuesday, 9 May 2017 3:21:04 PM
Attachments: [NSWHCA Response to P2P Regulations - FINAL 8May2017.pdf.pdf](#)
[point-to-point-regulatory-impact-statement-wcag.pdf](#)

I am an independent chauffeur/operator currently working in excess of 65 hours per week to ensure my limousine business remains viable.

I have attached the complex, 35 page Regulatory Impact Statement and found it difficult to fully understand due to the number of vague clauses that were too open for interpretation and even though I have not as yet renewed my membership with the NSWCA (NSW Hire Car Association), I will do forthwith because I fully support their representation of our industry and agree with all the questions it has brought to the chauffeurs' attention and yours.

The proposed changes to our industry (Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017, if implemented, will see the demise of single vehicle operators as there is both insufficient time to create and maintain the reporting structure recommended, insufficient income/funds to employ an administrator for the business whilst attempting to earn a living, pay BAS and income tax. The numerous hours & the amount of paperwork expected is unrewarding and time consuming. I currently submit my BAS monthly to ensure I get on top of income and expense records.

How can the State Government & the Transport Commissioner guarantee that the proposed new task force will be diligent in their work application to ensure the public are not at risk at popular special event venues, or bothered by drivers at the airport terminals who ply (tout) on a regular basis to gain an 'illegal' fare ? There has been no real blitz to stamp out this illegal operation by either SACL, NSW Police, AFP or the Transport Compliance officers.

While talking about the airport precinct, I note that hire car drivers will not be permitted to be more than 3 metres away from their vehicle at the Domestic Airport terminals 2 & 3 unless you can prove to authorities that you are assisting with the collection of client's luggage or taking the client's luggage inside the terminal building. How then are we to greet a first time client, who may not have a cell phone, and the booking arrangement is for us to use a name placard ? There are no erected sign differences, within the limousine loading zones at the airport, that clearly states we can be more than three metres away from our vehicle in order to complete our job in making contact with our passenger.

It is completely unfair that the Government has interfered with the conduct & operations of the professional chauffeurs because we have a special niche in our society whereby in many cases, we feel part of the family to plenty of our clients who entrust us to convey their children to school, we also carry out funeral transport, wedding transfers and many other special event transport needs. Our clientele consists of High Court/Federal Magistrates, celebrities, dignitaries, v.i.p.s and veterans who need reliable transport services by polished and professional drivers who can be trusted. It is also essential that our clients receive quick and

efficient transport by the beneficial use of bus lane privileges, especially over the Harbour Bridge. If the bulk of our business is in the lower and upper north shore or north west of Sydney then we will lose many of our clients because our benefits and privileges will be deprived, not because of outside/overseas competitors, but by our own State Government.

Please send a copy of your response, addressed to the NSW HCA, to me too.

Thank you & kindest regards,

Eric Klein

Hire car operator [REDACTED]

Tel: [REDACTED]