Dear Ms Wise,

NSW Point to Point Commissioner,

I am writing to you to voice my concerns over the new legislation which promotes the removal of competition and choice within the NSW point to point transportation industry.

The recommendations and legislation favour large businesses that are in a position to implement the strict and complex requirements being asked of all operators in particular around being, 'booking service providers'. This will either push small operators out of business or force them to join larger organisations such as Uber. This in turn will reduce competition and choice for the consumer. With Rideshare you cannot negotiate a fare. It is a virtual app based meter that calculates the fare based on the rideshare organisations algorithms. Rideshare drivers have no mechanism in accepting an alternate agreed fare with a passenger.

In 2014 the ACCC imposed $11 million penalty on Flight Centre for trying to enter into anti competitive arrangements with 3 international airlines. This new legislation will lead all operators down the same path of having deals done and
owner operators tied down and forced to accept the 'booking service providers' conditions

Competition doesn't come from a cookie cutter attitude.
Competition comes from a variety of options and choices for the consumer.
Do we tell the mum and dad corner store to shut shop just because we have coles express or 7 eleven on every corner? No we don't
Nor do we dictate to the airlines that they only fly budget services without business or first class seats!
So why does this NSW government want to restrict the trade of the Private Hire Car industry by removing Private Hire Car plates and effectively reducing competition and choice for the consumer?

The NSW point to point taskforce looked at all point to point transportation and notably with the taskforce findings and the new proposed legislation the main focus is on the Taxi industry remaining independent with rank and hail customers, while the Private Hire Car and Rideshare are amalgamated into one entity to provide an economy service.

Even Uber recognises the different service offerings between Taxis, Private Hire Cars and Rideshare. As per the Uber submission to the point to point taskforce, Uber also agrees that a level playing field is negative for the whole industry.
'A one-size-fits-all regulatory scheme is not a “level playing field” - it is poor public policy. Regulations must acknowledge relevant distinctions between different models operating in different markets, as they do already between taxis and hire cars. Taxis are legally and economically distinguished from other models, like hire cars, by their capacity to engage in anonymous rank and hail work. There are a range of economic and safety risks peculiar to that market and model. Taxi regulations are correspondingly more prescriptive. Ridesharing does not engage in rank and hail work. That will remain the exclusive domain of taxis. Nor does it engage in the advance booking work characteristic of traditional hire cars. Ridesharing operates exclusively in the “on-demand ready-to-ride” market. In that market, our technology-driven ridesharing model eliminates the most serious economic and safety risks applicable to alternative markets and models.'

The NSW Private Hire Car industry consists of mostly small owner operators (mum and dad run businesses). We have abided by the previous and current legislations and are being forced out by a government that is hell bent on bending over backwards to allow the Taxi industry to protect their license value and to allow new operators into the market all because they are so called 'disrupters'
who firstly operated illegally to force the government to act rather than to conform with the legislation and then work with the government to gain support for change.

Who's palms are being greased?

Yours Sincerely wanting a better fair go for the battler
Rob Videc

Sent from my iPad