



Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017
Point to Point Implementation
Freight, Strategy and Planning
Transport for NSW
PO Box K659
Haymarket NSW 1240

By email: pointtopoint@transport.nsw.gov.au

Dear Sir/Madam

RE: POINT TO POINT TRANSPORT (TAXIS AND HIRE VEHICLES) REGULATION 2017

On review of the proposed Regulations we respectfully make the following submissions:

Clause	Submission	Comment
25(1)	Transdev suggest that the information required to be made available should include the drivers licence number.	This provides an additional level of comfort to passengers that the driver is appropriately accredited and has not committed any of the offences set out in 26(2) of the Regulations.
52(3)	Additional wording required to clarify what constitutes approval for the purposes of a passenger approving a fare estimate.	Transdev considers that the regulations should make clear that acceptance of the fare estimate should be deemed to have occurred where the passenger requests the provision of the booked service following the provision of the fare estimate. This would avoid the potential ambiguity as to what is required to constitute approval of the fare estimate.
63	Additional wording required to confirm what 'the consent of the hirer' means for the purposes of the Regulations.	To ensure booking technology is compliant from commencement, Transdev request that this is further clarified. For example, given the nature of a shared service such as an on demand shuttle, is consent to other persons riding in the vehicle implicit in the act of booking?

We would be happy to engage further with the Point-to-Point Commissioner if any further clarification is required.

Yours sincerely

Nathan Lanthois
General Counsel
Transdev Australasia Pty Ltd