

Digital taxi top approval submission under public consultation phase

To whom it may concern,

This submission is intended for the New South Wales Point to Point Commissioner. This submission is made in reference to the allowance of Digital taxi top signage on top of taxis in New South Wales (“NSW”).

Relevant Law

Section 12, Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017.

Clause 126, Passenger Transport Regulation 2007.

Clause 299, Road Rules 2014.

Section 14, Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017.

Our goal

We aim to provide NSW the latest advancement in taxi advertising. This is in the form of digital taxi tops (“DTT”). We aim to achieve this by launching a DTT business venture.

The goal of our service is to bring the best technology to New South Wales to enable companies to advertise through an extremely effective median with incredible reach and efficiency. Our product is very unique and could be the first of its kind in NSW.

As stated by articles in the UK, digital taxi tops increase the appeal of taxis. Not only

is this beneficial for the taxi company, but it is also great for companies who will want to advertise with us. Our technology will create a unique presence in NSW, which will add to the growing nature of the state. It will also put NSW on the map in terms of regions that implement this technology.

Currently, Sydney already has static taxi tops (STT) however these are in the form of static tops, not the digital technology that we are proposing.

Point to Point Regulations and our goal

We have been advised that the new Point to Point amendments are geared towards improving safety and choice for customers, providing more opportunities for the taxi industry as a whole and allowing all modes of point to point transport to compete fairly. Our proposed business focuses on providing more opportunities for the taxi industry. This in turn allows local taxi companies compete more effectively with overseas competition.

Functionality of digital taxi tops:

Efficiency and more opportunity for local companies

One of the key benefits which digital taxi tops provide is that multiple companies are able to advertise on our tops at one time. This is achieved by allowing companies to run 10 second advertisements on our tops. The adverts change every 10 seconds which means that 6 companies are able to advertise within a 1 minute space.

Tailored approaches to advertising

Also, the content on the tops is remotely monitored whilst offering advertisers geo and time targeted advertising. This gives companies the brilliant opportunity to tailor their advertising campaigns in accordance with locations and time.

Design

DTT's are double sided with screens on both sides. When installed on top of a taxi, these side panels would be parallel to the footpath. The DTT's can be designed in accordance with the requirements for roof tops under section 14.¹

Comparison between digital and static tops

Please feel free to review the side-by-side comparison under the document name "Digital and static top comparison"). You will most likely notice that the overall placement and look of the DTT and STT are similar. The displaying of content is also similar due to the fact that both feature non-moving content. The two key differences are the following:

- that the content is being displayed on a digital screen and;
- content changes on the sign whilst on the road.

¹ Section 14, Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017.

Digital screens

Digital screens ensures that content is clearly seen and brightly lit at all times. The current STT's are not clearly seen at night time. This can be seen as a distraction to drivers at night as drivers can be trying to make out what is on signage whilst on the road. Ultimately this takes away the attention of drivers for longer. Whereas, clear and bright digital screens allow for a more clear cut and visible communication of advertised content.

Currently permitted Static tops

The tops currently permitted lack the efficiency and customizability which DTT's provide. The adverts are changed at the end of campaigns via changing of the inserts (the inserts have the content printed upon them) which go inside the panels on the tops. These lack the crisp image quality and changeability that DTT's have.

Content presentation of digital tops

We completely understand the concern for safety in regards to these digital tops. We have taken this on board and tailored our approach accordingly. Most of this comes down to how our adverts change. The change from one advertisement will be instant. Lengthy transitions are more distracting as they will be taking away surrounding drivers attention away for longer. Accordingly, transitional effects such as scrolling or dissolving (typically seen on digital advertisement signage) will also not be implemented. This is because once again, this will take away the attention of

surrounding drivers. There will be a focus on making sure that content which appears on our tops is clear. This is aided by the fact that the tops are digital, which provides for well lit and sharp imagery. Please [click here to be taken a video](#) for an illustration of how we intend for adverts to change. The video shows a DTT functioning in London.

More on appearance and content

We will ensure that the physical appearance of the top does not imitate any traffic sign or civil service vehicle. The rest of this will be down to the content, which will appear on the top's screen. Similarly, we will ensure that the content does not imitate any traffic signs. Please keep in mind that we are seeking approval for non-moving content on our tops, nothing which is of a flashing or moving nature.

Time efficiency for other companies

The tops available in Sydney at the moment are legally permitted. However, these are not as efficient as DTT's. That is because with STT's, only one ad campaign can run on the top at one time. Due to the fact that many campaigns run for many months, this means that one taxi can only run one advert for that many months. This means other companies lose out on the opportunity to advertise for a long period of time.

Since DTT's can autonomously change adverts, we can accommodate more companies without the need for manual intervention. The fact that DTT's can feature 6 different adverts in a minute shows how much more efficient this system is. We

would be giving local businesses a much more accessible opportunity to advertise on taxi's.

Presence of digital taxi tops overseas and safety concerns

It is well appreciated that the first and foremost concern which these taxi tops can bring about is that of road safety.

We understand that the changing of content on the tops is most likely the most important factor associated with safety. This is because changes can take away attention of other drivers on the road. As aforementioned, we minimize this risk by making sure content is not distracting in nature and allows drivers to maintain focus on the road and their driving.

The rise of taxi top business's around the world shows that the concept has been tried and tested. Ultimately resulting in the finding that any safety risks which may be associated with DTT's are not as valid as they might seem prima facie. Please refer below to different regions of the world adopting DTT's on their roads.

United Kingdom

We refer to a case study which relates to the United Kingdom. The Transport Of London (TFL) had concerns associated with road user safety and landscape. Accordingly, a test run of 25 tops was allowed within the city to see whether the

concerns were a justified and valid issue.² This was not the case, in December 2014, the TFL permitted that 1,000 taxi tops to be released on to the roads. Now there are at least 3 companies which have been permitted to operate the taxi top advertising business in the city of London.³

Turkey

The DTT is permitted in Turkey. It is currently active in the country's capital, Ankara. This is currently being run by a company called [ZAP Reklam](#)⁴

USA

DTT is available across 22 states in the USA. The company [Verifone](#) is operating a mix of digital and static taxi tops across a fleet of over 19,000 taxis.⁵ DTT's of Verifone have been featured extensively in New York City.⁶ Verifone started their first DTT campaign with 100 tops in early 2014.

Effect on taxi companies using our tops

² http://business-insight.sjassociates.org/2013_06_01_archive.html

³ <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/taxi-top-advertising>

⁴ <https://techcrunch.com/video/zap-dynamic-taxi-top-advertising/518472331/>

⁵ <http://screenmediadaily.com/verifone-media-launches-digital-taxi-top-ad-platform/>

⁶ <https://www.digitalsignagetoday.com/articles/digital-signage-already-on-the-field-for-this-years-super-bowl/>

Due to their incredible efficiency, our digital taxi tops venture will result in taxi companies earning additional income. We intend on giving a share to the taxi companies who allow us to put tops on their cabs. This benefit works in harmony with the purpose of the Point to Point regulation amendments which aims to provide more opportunities for the local taxi industry.

Alternative uses of digital taxi tops

Since DTT's can be updated remotely in real time, DTT companies overseas have come up with new and inventive ways to help the public in a beneficial way. This has been achieved by providing real time traffic data which is seen by the public. This is thanks to the ability to remotely and instantaneously update DTT's.⁷ This shows the great potential which DTT's have due to their efficient and technologically advanced functionality.

NSW Legislation

We are unaware as to whether the new Point to Point Transport Regulation 2017 overrides other transport laws located in other legislation which may be regarding a similar issue. We have made a brief mention of sections of other legislation which can be seen as relevant to our proposed venture.

We have come across section 12, Point to Point Transport Regulation 2017. This prohibits our proposed venture. Road transport legislation in other states of Australia

⁷ <https://www.engadget.com/2015/12/07/london-black-cab-traffic-signage/>

regarding exemptions often have provisions which allow the relevant minister to grant exemptions if it is regarded as reasonable. Similarly, we seek approval for our propose venture under Explanatory Note “S” of the Point to Point Regulation 2017 (Public consultation draft).

Summing up

It is evident that more and more regions worldwide are allowing DTT's to run on their roads. This is due to the efficiency and great potential these tops have. There are many benefits which tops can have on the local economy due to the accessibility they provide to local companies who want to expand their business. In addition to this, the local taxi industry can benefit from DTT's due to the additional source of income and increased attractiveness of taxis carrying DTT's. We understand that safety is of utmost concern, however, due to our approach to the venture, we believe that safety hazards are minimal and not that different to what is currently available (STT's). We kindly request that you look at this submission in light of the global advancement in respect to this area of advertising.

