

**Submission for the Point to Point Transport Taskforce
Proposed changes to the Point to Point Transport (Taxis and Hire Vehicles) Bill 2016**

Submission by fare media

fare media is a media owner that offers products that are all based in or on taxis. We currently operate over 430 digital touchscreen TVs in vehicles and over 200 rear boot signs. We also wrap taxis and provide other taxi related promotions to our clients.

Our aim is to provide innovative and effective products for our clients and greater returns of investment to our taxi owners. As part of that innovation we are currently looking to change over to digital rooftop signs.

The purpose of our submission is to change Clause 12

12 Digital displays prohibited

- (1) A vehicle used to provide a passenger service must not display on any exterior surface of the vehicle, or by means of a device attached to the roof or other exterior surface or fixture of the vehicle, any digital or other moving image.
- (2) This clause is specified as a safety standard for the owner of the vehicle.
- (3) The following are responsible persons for this safety standard:
 - (a) the provider of a taxi service (other than an affiliated service), if the vehicle is used to provide the taxi service,
 - (b) the facilitator of an affiliated service and the affiliated provider, if the vehicle is used to provide the affiliated service,
 - (c) the provider of a booking service, if the vehicle is a hire vehicle or taxi used to provide a related booked service,
 - (d) the holder of the taxi license for the taxi, if the vehicle is a taxi.

Intent of Clause 12

Clause 12 does not exist in the current regulations. Reading the explanatory notes, the main intent of adding clause 12 to the new regulations is to bring into line this bill with the Clause 126 of the Passenger Transport Regulation. The intent of this clause 126 (b) however is that any digital display unit or any device that shows moving images is prohibited not the devices themselves. It is our view that the term digital has been taken to mean moving, E.G video advertising, when in fact digital is just the method of updating the content.

Existing Marketplace

There are several static rooftop display networks throughout most Australian cities. Almost all of these networks rely on the method of printing a poster and manually inserting the poster into a carrier unit on top or on the rear of the car. However, with the rapid changes in technology it is now becoming more cost effective and desirable to change these units to digital displays allowing the static images on them to be changed remotely.



This is not a shift in the product that is offered but a change to increase efficiency, decrease environmental impact, lower costs to advertisers and make the product more dynamic and desirable. As technologies change so fast limiting digital displays entirely could prevent not only increased revenue streams to all taxi and hire car operators, but it can limit innovation for the industry.

One such example of this innovation is the American company WaiveCar <https://www.waivecar.com/>. WaiveCar is a Californian company that provides community access to vehicle FOR FREE. Their business model relies on advertising on digital rooftop signs to supplement the cost of vehicle rent and they provide the first two hours of use free to anyone. The vehicles are electric so there is no refueling costs. This is a very socially conscious, environmentally friendly and community focused innovation that would not be possible with the restrictions of digital rooftop signs.

Impacts

The impacts of clause 12 being applied in existing form are two-fold;

First, companies such as mine will be limited in the natural evolution to digital and will essentially become irrelevant in the marketplace. fare media's products are classified as Out Of Home (OOH) mediums and in our industry there is a huge push for operators to move over to digital signage to display images. Large operators are transforming their traditional billboard sites all over Australia, not because they want to display video but because the advertising industry is demanding more flexibility, creativity and innovation.

Currently Digital Out Of Home displays share 50% of all revenues in OOH but they only make up a fraction of the number of displays available. If a business can't innovate and move to digital displays then the marketplace will pass that business by.

Secondly, taxi owners and hire car operators will miss out on additional revenue streams. Advertising has been one of the few revenue streams that taxis can add to their bottom line. Placing a ban on digital displays effectively will kill off the industry and in-kind the additional revenue streams for those operators.

Suggested Changes

We would like the clause 12 to be re-written to reflect the true meaning of the word digital as a method of operation not a moving picture. Our suggested writing of the clause should be;

12 Advertising on Taxis and Hire Vehicles

- 1) A vehicle used to provide a passenger service is permitted to display on any exterior surface of the vehicle, or by means of a device attached to the roof or other exterior surface or fixture of the vehicle, any advertising provided;
 - a) That any advertising does not interfere or remove any applicable information disclosures;
 - b) Any devices attached to vehicles, for the purpose of advertising, does not display video, flashing lights or moving images;
 - c) The advertising displayed does not violate the Association of National Advertisers' Code of Ethics.

The changes would reflect the Point to Point Transports recent memo that informs the industry that Point to Point and the NSW Government are no longer regulate advertising and livery on taxis. It would also provide clarity on all forms of advertising not just digital and provide a standard to work to too insure the industry is not placed in a compromised situation courtesy of the types of advertisements displayed.



Conclusion

The taxi and hire car industry can greatly benefit from digital signage and all forms of advertising. Whether this be a financial reward, an exciting innovation or a greater way to communicate with their customers. Point to Point rightly sent out the statement that control of advertising for taxis is no longer regulated by the NSW Government but we do believe there needs to be some safeguards in place to prevent unsafe practices. We hope that you will consider our rewritten clause that encompasses all advertising and sets some safe guidelines for the industry.

If you require any further comment on this submission please feel free to contact Luke O'Connor, fare media's Managing Director [REDACTED] or [REDACTED].

Yours sincerely



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