



LEGION CABS

Legion Cabs Submission on Point to Point Regulations

Legion Cabs is broadly supportive of the regulations and looks forward to working with the New South Wales Taxi Council and the New South Wales Government to help modernize and build upon the solid foundations of the Industry in New South Wales.

There are however, a few items the Legion Board feels require some extra thought.

Primarily, Legion Cabs has deep concerns over the Vehicle registration standards. It can be seen already, that there is an apparent "race to the bottom" from some operators to put vehicles back on the road that had previously been considered past their use-by date. This is evidenced by the number of Ford Falcon Station Wagons appearing back on the road, which had been previously decommissioned after passing the previous age restriction of 6 years, 6 months. Legion Cabs is concerned that whilst some networks will hold their vehicles to a high standard, others may not. This would – and already is – result in vehicles that are old and tatty being driven on the roads. The net impact of this is a negative on the industry as a whole as passengers would understandably move away from the industry towards other modes of transport.

The public safety aspect of having older vehicles on the road needs no explanation. Legion Cabs would fully support a re-introduction of the 6 year 6 month age limit.

Legion Cabs would also like to see the inspection regime return to its previous form. Whilst we understand that this could be managed by Legion Cabs internally, our concern is that other networks could allow the standard to slip which again would prove damaging to the industry as a whole. The Legion Board also considers the re-introduction of uniforms for drivers to be of importance, We have spent some time at the airport holding bay in recent months and the dress standard varies from suit and tie to shorts, singlet and sandals. We feel this is not appropriate for an international city like Sydney.

Legion Cabs also considers the Vehicle Identification Clause to be inadequate. A far simpler approach would be to have a single identifier for any Hire Car or Rideshare vehicle. This would enable more effective compliance activity and reduce the need for a Police officer or Compliance Officer to have to know the Logos of a dozen or more different Hire Car/Ride Share companies. A single identifier would enable easier recognition by members of the public waiting for a Hire Care/Ride Share vehicle too.

Any such Identifier should be placed in the front and rear windows, perhaps something similar to the "L" and "P" Plates used to identify Learner and Provisional drivers to other motorists.

With regards to Driver Identification, Legion Cabs believes that a single body should be responsible for issuing of a Driver Authority – at least in the Taxi Industry. Our workforce is quite fluid and an operator may have Taxis in several different fleets. If a Driver working for one of these operators had to drive say a Premier Taxi on a particular day, he would have to go to Premier and do the induction to drive only one shift. This is impractical and restrictive to the labour market in the Taxi Industry.

A one stop shop, perhaps the NSW Taxi Council, as the issuing body, could induct drivers to the required standard for all its member networks and issue a driver identification. The driver could then move more freely between the different networks as was required.

Legion Cabs is supportive of the English Language requirements for Taxi Drivers but is of the firm belief that this should be extended to cover all point-to-point transport services.

From an operation perspective, the requirement for Records of Passenger service transactions are a little impractical. It is often the case that a passenger may not wish to provide contact information, for example, Legion Cabs uses "hotline" telephones or "Press Here" booking devices in many of the major Clubs and Hospitals in the Sydney Metropolitan area. A passenger can simply walk up to the desk, pick up the phone and book with a voice prompt system – such a system does not capture a Name and Phone number for the passenger. The "Press Here" Tablet based technologies employed by Legion require the passenger to only touch a button on the device screen to place a booking. These high-volume places require quick and easy booking platforms to move patrons out of their premises and the regulations would restrict these services making them more onerous to the Clubs/Hospitals.

There are often times when passengers may not know the number they are calling from or simply do not wish to provide the number to us. This should not be a barrier to travel for such passengers. The Legion Board is deeply concerned about the \$0.03 Authorisation fee. We understand that further negotiations are being undertaken by the NSW Taxi Council in relation to this issue but must flag that this is a very serious issue for the NSW Taxi Industry.

Legion would be supportive of an annual fee – based on the vehicle, to be paid by plate owners or vehicle owners – to the Commissioner instead of the \$0.03 per passenger journey fee which is totally unacceptable to Legion Cabs.

As with the \$0.03 Authorisation fee, the \$1.00 Passenger Service Levy is also of grave concern to the Industry. Whilst a Ride Share company like Uber can "clip the ticket" before passing the earnings on to the driver, the taxi industry, using the Bailee/Bailor arrangement, as determined by law, simply cannot as the money flows the wrong way. The cost of compliance for Legion Cabs would be extraordinary.

Legion completes around 40,000 bookings a month and at an estimate approximately 160,000 hail jobs. Legion Cabs has approximately 3000 drivers active on our network. The cost of chasing those drivers who were slow to pay would irreparably cripple our business – we are at a loss as to how the smaller networks would cope with such a massive cost impost.

Legion is also concerned that a driver may choose to jump from network to network without paying his levy and eventually end up in the ride share space as it is easier. This may become a barrier to entry for our industry. Again, Legion Cabs understands that further discussions are to be held in relation to this matter and welcomes further consultation.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Lee Furlong', with a long, sweeping horizontal line extending to the right.

Lee Furlong
Legion Cabs