

From: [REDACTED]
To: [pointtopoint](#)
Subject: Point to Point Transport Regulation feedback.
Date: Sunday, 21 May 2017 3:04:35 PM

I realise the submission date has passed but after recently reading the draft regulations I feel I need to make a late submission.

My main concern revolves around the differentiation between existing tourist services and the Part 1 Preliminary - Definitions 2 a,b,c,d for passenger services. Currently mini buses of 12 or less and trikes can ply their trade for tourists but in the future they must come under these new regulations and therefore there is no considerations for them and their services will become illegal.

To explain: In the world wide cruise ship industry, disembarking passengers at a port have the choice of purchasing a pre organised day tour on board (30%) or be independent and chance what they can find available on the wharf (70%). Small day tour operators (mini bus, 4WD and trikes) can 'tout' their tour for walk up passengers and when enough seats sold, leave on their tour. Bookings can be taken from a centralised tent but the operators still need to be parked there for availability and answering questions i.e. selling their tour. For some reason 4WD operators have not been caught up in this net. (and 43(2)(e) is impractical to do with international visitors).

I currently have bus, 4WD and hire car accreditation and these new regulations only create confusion for how I will operate in the future. Tourism services need some separate regulations written or exemptions to apply. The Act was written with only taxis and ride share operators in mind.

The other issue I have is the need for hire cars to have access to taxi zones for the pick up and set down of booked passengers. Explanatory Note (p) page 2 implies that this is allowable yet Div 3 clause 85 reads differently. Hire cars MUST have access otherwise they have no choice but to stop in traffic in busy commercial areas.

Hope this is not too late for consideration.

Regards

Ken

Sent from my iPad