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## **Proposed Regulations for Point to Point Transport in NSW**

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## **1. About Blind Citizens Australia**

Blind Citizens Australia is the peak national representative organisation of and for people who are blind or vision impaired. Founded in 1975, our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes and by striving for high quality and accessible services which meet our needs.

We provide peer support, information dissemination, advocacy support and advice to community and government on issues of importance to people who are blind or vision impaired.

Our work is directly informed by lived experience of blindness and vision impairment. Our members, our Directors and the majority of our staff are blind or vision impaired.

## **2. Introductory Comments**

Thank you for providing Blind Citizens Australia with an opportunity to provide comment on the proposed regulations for point to point transport services operating across NSW.

People who are blind or vision impaired are amongst the most frequent users of point to point transport services. The landscape for point to point transport has evolved significantly over the past few years due to the emergence of rideshare services. Regulations will play a critical role in ensuring the rights of passengers with disability are protected and upheld in this new point to point transport environment.

We remind the Department of Transport that the NSW Government has made a firm commitment to uphold, promote and protect the rights of people with disability. This commitment has been clearly established under the NSW Disability Inclusion Act and NSW Disability Inclusion Plan; which aim to give rise to the rights that have been laid out in the United Nations Convention on the Rights of Persons with Disabilities.

We assert that the regulations, in their current form, fall well short of the Department's obligations under the NSW Disability Inclusion Act and NSW Disability Inclusion Plan. To this end, it is our hope that the Department will consider putting adequate safeguards in place to ensure people who are blind or vision impaired have equitable access to point to point transport services into the future.

## **3. Barriers to the Consultation Process**

Our staff experienced great difficulty with obtaining copies of the proposed regulations and accompanying regulatory impact statement in accessible electronic format. Like many of the people whom we represent, our policy and advocacy staff use screen reading software to interact with their computers and perform the various functions of their respective roles. The consultation documents that were available via the Department's Point to Point Transport Reform website, however, were only provided in inaccessible pdf format. Upon calling the Service NSW contact number that was listed on the reform website, our staff were then told the documents were not able to be provided in any other format and that the only alternative available was for them to be sent a hardcopy version of the document by mail. This is obviously not a feasible option

for people who are blind or vision impaired, and the customer representative responsible did not seem to understand the severity of this situation.

The Department's failure to provide consultation documents in accessible format goes against its obligations under the Disability Discrimination Act 1992 (Cth) and the vision articulated in the NSW Disability Inclusion Plan. While we were eventually able to obtain accessible copies of the consultation documents by escalating the issue through Transport for NSW, this matter took nearly two days to resolve. This placed an unnecessary burden on our already stretched resources, and if unaddressed, would have prevented us from providing feedback to this consultation.

Under the NSW Disability Inclusion Plan, the Department of Transport is required to implement and monitor a Disability Inclusion Action Plan to outline how it will enhance accessibility in all areas of operation. When reviewing this plan, Transport for NSW must give careful consideration to strategies that will assist in imbedding a culture of accessibility within the Department to mitigate the risk of similar issues arising in the future.

#### **Recommendation 1:**

The Department of Transport must ensure its Disability Inclusion Action Plan highlights the steps that are to be taken to ensure its internal processes are inclusive and accessible. Such measures may include the provision of disability awareness training to frontline staff working in the Service NSW contact centre, and mandatory training in web accessibility for all staff working in IT and web-related roles.

## **4. Issues relating to access to information**

Access to information is one of the fundamental cornerstones of social, cultural and economic participation. In reference to point to point transport services, access to information is crucial in enabling passengers to:

- Make informed decisions about the services they use
- Understand their rights
- Uphold their rights by making complaints about misconduct or service quality when the need arises

We note that under current arrangements, for example, a driver is able to be fined up to \$11,000 for demanding a fare that exceeds the amount of the fare that has been determined for the service under a fares order. Without having access to the vehicle registration number, fare rates and charges, and metered information, there is no way for an individual to ensure their rights are upheld in the event that they have been overcharged.

Further, while the proposed regulations aim to create a more competitive market for point to point transport services across NSW, the absence of strict accessibility requirements will mean the notion of consumer choice will not extend to people who are blind or vision impaired. In fact, it is likely that the regulations, in their current form, will result in people who are blind or vision impaired experiencing more barriers to accessing point to point transport services in the future.

The right of people with disability to be able to access information on an equal basis with others is clearly laid out in a number of legal and regulatory frameworks including:

- The United Nations Convention on the Rights of Persons with Disabilities
- The Disability Discrimination Act 1992 (Cth)
- The Disability Standards for Accessible Public Transport 2002
- The National Disability Strategy 2010-2020
- The NSW Anti-discrimination Act 1977
- The NSW Disability Inclusion Act 2014
- The NSW Disability Inclusion Plan 2015

The issues raised throughout this section of our submission will highlight a number of instances where the proposed regulations fall short of the NSW Government's obligations under these frameworks. We also urge the Department to remember that the vast majority of people who are blind or vision impaired are over 65 years of age and may not be confident in the use of computer-based technology. Point to point transport providers cannot therefore rely solely on such mediums in order to communicate vital information to passengers who are blind or vision impaired.

Further, the recommendations we have put forward to ensure equitable access to information for people who are blind or vision impaired, if implemented, would also offer significant benefits for the broader community. According to data from the Australian Bureau of Statistics, around 46% of the Australian population has difficulty reading or interpreting written information. It is therefore imperative that the NSW Government ensures that services that are available to the public are responsive to community needs, and can be accessed by the broadest range of people possible.

#### **4.1. Accessibility of vehicle registration numbers**

In reference to clause 14 of the proposed regulations, the regulatory impact statement notes:

“The existing requirement for vehicle registration numbers to be displayed on the doors of the taxi has been removed as these numbers are already displayed on the front and rear number plates and on the inside of the taxi”.

Blind Citizens Australia strongly rejects the view that the requirement for taxi registration numbers to be displayed on the side doors of the vehicle should be removed. At present, the numbers on the side doors of the vehicle are required to incorporate raised tactile print to provide a level of access for passengers who would otherwise not be able to read the number independently. This feature can be useful in assisting passengers who are blind or vision impaired to differentiate between a taxi and a privately owned vehicle. The primary function of this feature, however, is to ensure people have equal access to the vehicle's registration number so they are able to report any incident that may arise.

This requirement was introduced in response to extensive advocacy on the part of the blindness sector. Its removal would constitute a backwards step in the Department's commitment to people with disability, which goes against the whole of government vision articulated in the NSW Disability Inclusion Plan. Providing the vehicle registration number in raised tactile print on another part of the vehicle's exterior would also not be a suitable alternative, as the vehicle door is the most suitable and accessible location for this information to be placed.

We would ultimately like to see the new regulations further the NSW Government's commitment to accessibility by including a requirement for vehicle registration numbers to be provided in Braille, as well as tactile raised print. Many people who have been blind from an early age are either less familiar with print letters, or not familiar with the print alphabet at all. It is also more efficient for a Braille-reader to access information via Braille rather than raised print as it can be read more quickly. This however, does not mean that the raised tactile print that is currently mandated should simply be replaced with Braille. There is no one size fits all approach, and raised tactile print and Braille are both required to ensure vehicle registration numbers can be accessed by the broader population of people who are blind or vision impaired. Modelling best practice, the Queensland Government already requires vehicle registration numbers to be displayed in raised tactile print and Braille on the passenger doors of the vehicle. The subsequent feedback we have received from our Queensland-based members has been very positive.

We also urge Transport for NSW to consider mandating the inclusion of tactile and Braille numbers inside taxi vehicles.

**Recommendation 2:**

The regulations must be amended to include a requirement for registration numbers to be provided in raised tactile print and Braille on the side doors of the vehicle, as well as in the interior of the vehicle.

## **4.2. Accessibility of metered fare information**

The regulatory impact statement notes:

“Clause 16 replaces the concept of the taxi meter with the more generic ‘fare calculation device’.”

While the proposed Regulation sets broader requirements around the display of fares and figures, it does not impose any requirement to ensure information about metered fares is provided in a format that is accessible to people who are blind or vision impaired.

Talking Taxi Meters with audible speech output have been in use in other parts of the world for quite some time and in recent years, have been introduced in Queensland. These meters allow a passenger who is blind or vision impaired to keep track of the fare and to know what the total is independent of the driver telling them. The devices can also be configured to allow the speech output to be turned on or off according to the preference of the passenger.

This technology is readily available and is not cost prohibitive to implement. We acknowledge that it is not practical to expect talking taxi meters to be implemented across the entire taxi fleet immediately. We do, however, assert that the Department has a responsibility to put a roadmap in place to outline a future path for the progressive implementation of talking taxi meters across NSW. We understand that the industry will need sufficient time to adjust to these changes and are very open to working with the Department to discuss how this goal can be realised over a period of time.

**Recommendation 3:**

The regulations must be amended to include a requirement for all vehicles to be fitted with a fare calculation device with speech output capability by the year 2020.

**Recommendation 4:**

The Department of Transport should undertake further consultation with the blindness sector and taxi industry representatives to discuss how the progressive implementation of talking taxi meters can be practically achieved.

**4.3. Access to information about whereabouts on a point to point transport journey**

We continue to receive complaints about drivers of point to point transport vehicles dropping passengers a significant distance away from their specified location. Where passengers do not have independent access to information about their whereabouts, however, there is often no way for the passenger to tell they are not in the correct place until they have completed payment and exited the vehicle. This has the potential to place people in significant danger, as they often have no way of determining their whereabouts and visually assessing the surrounding environment.

We refer to section 27.4 of the Disability Standards for Accessible Public Transport 2002, which requires that:

“All passengers must be given the same level of information regarding their whereabouts on a public transport journey.”

When the transport standards were first developed, the technology available was not sufficient to ensure that passengers of point to point transport services could consistently be provided with information about their whereabouts independent of the driver. As all point to point transport vehicles are now fitted with GPS technology, however, this level of information can now easily be provided by activating the speech output on the vehicle’s GPS device. This is an important safety feature for people who are blind or vision impaired, and it is imperative that this is properly reflected in the proposed regulations.

**Recommendation 5:**

The regulations must be amended to require the driver of a point to point transport vehicle to activate the audible speech output on their GPS device at the request of the passenger.

**4.4. Access to websites and smart phone applications**

The regulations, in their current form, do not impose any requirement on point to point transport providers and booking services to provide web-based information in formats that are accessible to people with disability. Without referencing the need for web-based services to be compliant with the Web Content Accessibility Guidelines 2.0 and enforcing accessibility as a core requirement of any point to point transport service, passengers who are blind or vision impaired will not have the ability to exercise true choice and control over the services they use.

**Recommendation 6:**

The regulations must be amended to clearly state that all web-based content and smart phone applications developed by point to point transport providers must fully comply with national and internationally recognised accessibility requirements.

**Recommendation 7:**

The Point to Point Transport Commissioner should have the ability to investigate instances of non-compliance with accessibility requirements, and impose a penalty for services that fail to resolve accessibility issues within a time frame to be specified by the Commissioner.

## 5. Issues Relating to Drop-offs and Passenger Assistance

### 5.1. Access to airport precincts

Imagine for a moment that you are blind. You are travelling independently, and are accessing a point to point transport service to make your way to the airport for your upcoming flight. Upon arriving at the airport, your driver tells you they aren't able to exit their vehicle to assist you. You are not familiar with the layout of the airport, and are now left with the task of trying to locate the entrance to the correct part of the airport building yourself - which ends up being a long way from where you have been left. You have a cane in one hand, and are towing your luggage with the other. There doesn't seem to be any other people around to ask for help and you're starting to feel very anxious and confused.

The above example is a frequent occurrence in the lives of many people who are blind or vision impaired, and the proposed regulations do nothing to improve this situation. At Clause 68, the regulations require that:

“a driver of a passenger vehicle must not, "without reasonable excuse", move more than 3 metres from their vehicle while in the Sydney airport Precinct or other airport.”

Clause 68 states that an exemption to this rule would exist where the purpose of such movement is to load luggage or goods from the vehicle. It does not, however, state that providing assistance to a passenger with disability would also constitute a “reasonable excuse” within the definition provided at clause 68.

Furthermore, the draft regulations impose a penalty for stopping in a taxi zone in instances where a taxi has been hired. This further impacts on a driver's ability to drop the passenger as close as possible to their final destination, and/or exit the vehicle to provide assistance to a passenger when required.

**Recommendation 8:**

The regulations must be amended to state that a driver may leave their vehicle within an area precinct for the purpose of providing assistance to a passenger with disability. This provision must be extended to Hire Car and rideshare services, as well as taxi services.

**Recommendation 9:**

All airport precincts must include designated drop-off zones within close proximity of the terminal that can be accessed by hire car, rideshare and booked taxi services. In the

absence of designated drop-off zones, a in instances where they are transporting a passenger with disability, drivers of point to point transport services must be permitted to temporarily park in taxi zones without penalty.

## **5.2. Parking enforcement**

People who are blind or vision impaired will often utilise point to point transport where they are unfamiliar with a particular location, and will not be required to access that location on a regular or ongoing basis. Even in instances where an individual is relatively familiar with their destination, however, they may still not always be familiar with the surrounding area. For safety reasons, it is therefore vitally important for passengers who are blind or vision impaired to be able to be dropped as close as possible to their specified destination.

Prior to 2002, parking enforcement fell under the jurisdiction of NSW Police. NSW Police would always approach such matters with common sense and understanding; acknowledging that a driver may be required to temporarily pull over in a restricted zone to ensure their passenger safely reached their destination. With local Councils focusing solely on revenue raising, however, this common sense approach has been lost. As a result, drivers of point to point transport vehicles have become increasingly reluctant to drop passengers who are blind or vision impaired within a safe and appropriate proximity of their destination for fear of being fined.

### **Recommendation 10:**

The Department of Transport should work with the Office for Local Government to ensure that in instances where a driver is transporting a passenger with disability, and where temporarily parking in a restricted zone would not compromise public safety, drivers are able to drop the passenger as close as possible to their destination and/or exit the vehicle to provide assistance without being fined. This flexibility should extend to hire car and rideshare services, as well as taxi services.

## **6. Accessibility of electronic payment devices**

Blind Citizens Australia has recently assisted a number of clients to pursue complaints of Disability Discrimination with the Australian Human Rights Commission. These complaints were lodged in relation to the clients' respective encounters with a new touchscreen EFTPOS terminal that is currently being rolled out across Australia. While people who are blind or vision impaired are usually able to complete a transaction quickly and easily by entering their PIN via a physical keypad, these new touchscreen devices do not provide the same level of accessibility. As a result, several of the complainants were unable to complete their payments independently and were forced to divulge their PIN to a third party.

We have already received reports of similar devices emerging within the point to point transport environment. The use of such devices will not only severely compromise the dignity, independence and privacy of passengers who are blind or vision impaired, but will also leave providers of point to point transport services open to receiving complaints under state and federal anti-discrimination law.

In the case of the aforementioned complaints that were lodged with the Australian Human Rights Commission, the merchants involved were completely unaware that the payment terminal they were using was not accessible to people who are blind or vision impaired and were deeply regretful for the complexities that had arisen as a result of this ignorance. It is the role of a responsible government to champion accessibility by putting clear accessibility requirements in place. This will mitigate the risk of similar issues arising in the future and will help to build a broader awareness of access requirements within the point to point transport industry.

**Recommendation 11:**

The regulations must be amended to include an additional clause relating to electronic payment terminals that are permitted for use within point to point transport vehicles. This clause should clearly state that the terminal must have a tactile pin pad to ensure all passengers are able to complete their payment independently. The use of touchscreen payment devices should be strictly prohibited.

## **7. Access for passengers accompanied by an assistance animal**

We commend the Department for ensuring the draft regulations impose a penalty for failure to carry an assistance animal. As noted in the regulatory impact statement, this is particularly important for people who are blind or vision impaired who are accompanied by a Guide or Seeing Eye Dog. At clause 77, however, the regulations establish a provision for drivers to refuse to carry a passenger in instances where:

"...the intending passenger is a person who is, or who is carrying a thing that is, likely to soil or damage the taxi or the clothing or luggage of other passengers..."

We are concerned that the ambiguity of this clause may provide drivers with a basis on which to refuse service to passengers who are accompanied by a Guide or Seeing Eye Dog.

**Recommendation 12:**

The regulations must be amended to ensure that drivers clearly understand that they must not, under any circumstances, deny access to a passenger who is accompanied by a Guide or Seeing Eye Dog that complies with the requirements for assistance animals under the Disability Discrimination Act 1992 (Cth).

## **8. Expansion of the Taxi Transport Subsidy Scheme (TTSS)**

The point to point transport reforms that have been introduced to-date have been focused on increasing consumer choice. Unless the Taxi Transport Subsidy Scheme (TTS) is adapted to reflect these changes, however, this same level of choice is not likely to extend to people with disability. To this end, we would strongly support future reforms that would provide users of the Taxi Transport Subsidy Scheme with greater choice and control over the services they use for point to point transport.

Future changes to the TTSS should also result in the abolishment of the inaccessible paper-based vouchers that are currently in use in NSW. At present, a signature is

required to authorize the information that has been documented on each voucher in terms of pick-up point and destination. A person who is blind is unable to see what their driver has written on the voucher, meaning that they do not know what it is they are authorizing. This system therefore leaves Transport for NSW open to potential complaints of disability discrimination, and also goes against one of the policy directives outlined in the National Disability Strategy 2010-2020, which refers to:

“A public, private and community transport system that is accessible for the whole community.”

The paper-based system is also outdated and open to fraud and misuse by taxi drivers and scheme participants alike. In 2012, for example, a member of BCA was under investigation for misconduct under the TTS due to her long-term taxi driver having falsified a number of addresses when filling in her vouchers so that he could be reimbursed for a greater amount. This driver was someone that the woman thought she could trust, however the inaccessible nature of the vouchers prevented her from verifying what had been written. This process was very disconcerting for the individual involved and could have been avoided had an electronic payment system already been in place.

Again in 2012, two of BCA’s directors shared a taxi in Coffs Harbor and upon reaching their destination, were told by the taxi driver that if they provided him with two M40 taxi vouchers, they would not need to pay for the other half of the fair. While the two individuals involved knew that this was against the law, the taxi driver tried to convince them that this was standard practice and it is our understanding that this misuse occurs on a regular basis.

While these cases took place several years ago, the circumstances that gave rise to these complaints remain the same. Electronic card payment systems have been used to administer taxi subsidie schemes that exist in Victoria and Brisbane for many years now, but NSW continues to lag behind. This is despite the work the NSW Government has already undertaken around this issue. For example:

- In 2003, The Ministerial Inquiry into Sustainable Public Transport highlighted the problems that exposed the TTS to misuse and recommended that it be reviewed.
- In 2004, The NSW State Government announced that a review of the TSS be conducted by the NSW Ministry for Transport and that this review would include the trial of an electronic transaction system in Coffs Harbour, Wagga Wagga and Sydney.
- In 2006, The Ministry of Transport released a review report which published the findings of the electronic card trial and made recommendations for the future reform of the scheme. Recommendation 3 of the report stated:  
“The TTSS Smartcard should be introduced as a matter of urgency.”
- In correspondence to BCA in 2013, Transport for NSW indicated that options for the introduction of an electronic system were under investigation, noting that would have several options available for implementation in 2014.

We note that the introduction of an electronic payment system is also already supported by the taxi industry. In April 2012, the NSW Taxi Council issued a response to the Transport for NSW Long Term Master Plan, stating:

“A card-based electronic payment system should be introduced as soon as possible to replace the paper-dockets being used for the Taxi Transport Subsidy Scheme. Paper based schemes are outdated and are subject to fraud.”

**Recommendation 13:**

The TTSS should be expanded to allow passengers to utilise their subsidy when accessing taxi services, rideshare services and community transport. The point to point transport regulation must reflect these changes, and provide point to point transport providers with clear guidance on the requirement to honor the provisions of the TTSS when transporting passengers with disability.

**Recommendation 14:**

The Department of Transport must commit to the future implementation of an electronic card-based system to replace the inaccessible paper-based vouchers that are currently in use under the TTSS.

## **9. Conclusion and summary of recommendations**

Thank you once again for providing Blind Citizens Australia with an opportunity to provide feedback on the proposed point to point transport regulations. As highlighted throughout this submission, the draft regulations lack appropriate measures to ensure equitable access to point to point transport services for passengers who are blind or vision impaired. This goes against the broader intentions of the NSW Government's point to point transport reforms; which aim to ensure there are adequate measures in place to protect passenger safety and safeguard against instances of misconduct.

It is our hope that Transport for NSW may see the benefit in undertaking further consultation with key organisations within the blindness sector to ensure the regulations, once finalised, provide measures that will ensure passengers who are blind or vision impaired are adequately protected in the new point to point transport environment. We would welcome the opportunity to discuss the recommendations raised throughout this submission further. These recommendations have been summarised again below for ease of reference.

### **Recommendations**

1. The Department of Transport must ensure its Disability Inclusion Action Plan highlights the steps that are to be taken to ensure it's internal processes are inclusive and accessible. Such measures may include the provision of disability awareness training to frontline staff working in the Service NSW contact centre, and mandatory training in web accessibility for all staff working in IT and web-related roles.
2. The regulations must be amended to include a requirement for registration numbers to be provided in raised tactile print and Braille on the side doors of the vehicle, as well as in the interior of the vehicle.
3. The regulations must be amended to include a requirement for all vehicles to be fitted with a fare calculation device with speech output capability by the year 2020.
4. The Department of Transport should undertake further consultation with the blindness sector and taxi industry representatives to discuss how the progressive implementation of talking taxi meters can be practically achieved.

5. The regulations must be amended to require the driver of a point to point transport vehicle to activate the audible speech output on their GPS device at the request of the passenger.
6. The regulations must be amended to clearly state that all web-based content and smart phone applications developed by point to point transport providers must fully comply with national and internationally recognised accessibility requirements.
7. The Point to Point Transport Commissioner should have the ability to investigate instances of non-compliance with accessibility requirements, and impose a penalty for services that fail to resolve accessibility issues within a time frame to be specified by the Commissioner.
8. The regulations must be amended to state that a driver may leave their vehicle within an area precinct for the purpose of providing assistance to a passenger with disability. This provision must be extended to Hire Car and rideshare services, as well as taxi services.
9. All airport precincts must include designated drop-off zones within close proximity of the terminal that can be accessed by hire car, rideshare and booked taxi services. In the absence of designated drop-off zones, in instances where they are transporting a passenger with disability, drivers of point to point transport services must be permitted to temporarily park in taxi zones without penalty.
10. The Department of Transport should work with the Office for Local Government to ensure that in instances where a driver is transporting a passenger with disability, and where temporarily parking in a restricted zone would not compromise public safety, drivers are able to drop the passenger as close as possible to their destination and/or exit the vehicle to provide assistance without fear of being fined. This flexibility should extend to hire car and rideshare services as well as taxi services.
11. The regulations must be amended to include an additional clause relating to electronic payment terminals that are permitted for use within point to point transport vehicles. This clause should clearly state that the terminal must have a tactile pin pad to ensure all passengers are able to complete their payment independently. The use of touchscreen payment devices should be strictly prohibited.
12. The regulations must be amended to ensure that drivers clearly understand that they must not, under any circumstances, deny access to a passenger who is accompanied by a Guide or Seeing Eye Dog that complies with the requirements for assistance animals under the Disability Discrimination Act 1992 (Cth).
13. The TTSS should be expanded to allow passengers to utilise their subsidy when accessing taxi services, rideshare services and community transport. The point to point transport regulation must reflect these changes, and provide point to point transport providers with clear guidance on the requirement to honor the provisions of the TTSS
14. The Department of Transport must commit to the future implementation of an electronic card-based system to replace the inaccessible paper-based vouchers that are currently in use under the TTSS.