



The London Taxi Company (Aust) Pty Ltd  
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16<sup>th</sup> April 2017

To: Transport for NSW

**Subject: Proposed Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017**

Dear Sir/Madam,

London Taxi Company and London Transport would like to raise the following feedback in relation to the proposed Point to Point Transport Regulations public consultation:

**1. Clause 11 Wheelchair accessible vehicles**

Defines the standards by which the WAT must comply.

Clause 11 (1) (a) defines the prism inside the vehicle – this should be removed as the prism is already described in the Disability Standards for Accessible public transport a requirement of clause 11 (1) (d). If the disability standards for accessible public transport changes, then the point to point regulations for NSW won't be consistent with the federal standard.

**2. Clause 12 Digital Displays prohibited**

Taxis should be able to carry advertisements. The term digital is picking a term that intends to prevent moving pictures that could be distracting, however we believe the objective is better achieved by prohibiting a moving display on a vehicle and describing exactly what that prohibited motion is, such as a displayed image should not change for a prescribed period of time such as those restrictions in place for dynamic signs displayed adjacent to public roads.

We would contend that a moving image would be described as any image within a display area that changes within a 60 second period.

A secondary regulation might be that changes of an image in a display area should only occur when the vehicle is parked (and vehicle transmission selector is in the Park position)

**3. Clause 20 Approved security camera systems and safeguards**

Appendix 3 Draft Security Systems Specification for taxis Clause 14 calls for two externally mounted cameras. This should be amended to two side facing camera that achieve the viewing requirements. Some vehicles such as the London Taxi have a higher roof line than average people height, and therefore an external mounted camera would need to be mounted on the sides of the vehicle which then would present dangers to other road users and pedestrians.

Please do get in touch with us if you wish to discuss any of these points in greater detail.

Yours Truly,

Ross Pendergast

Director

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London Transport Pty Ltd