



Monday 1 March 2010
Mr John Ajaka MLC
Select Committee on the NSW Taxi Industry
Parliament House
Macquarie Street
Sydney NSW 2000,

Select Committee on the NSW Taxi Industry

Dear Mr Ajaka,

Thank you for the opportunity to participate in the consultation of the 2010 NSW Taxi Industry. The Physical Disability Council has submitted additional comment on the following Questions On Notice:

- 1) Your submission notes that 'the main problem with WAT design is that not all WATs accommodate all wheelchairs' and continues to note that there is an increasingly diverse number of mobility devices available (p.7). What impact does the lack of accessibility have on users of mobility devices? What measures can be undertaken to overcome these issues?
- 2) Based on your experience, do you believe the WAT Taxi Driver Incentive Scheme has resulted in better transport services for people in with a disability?
- 3) Several submission authors have noted that the value of the Taxi Driver Incentive Scheme does not adequately cover the increasing costs of taxi transport. Do you believe that a sufficient subsidy is provided by the scheme?
- 4) Several submission authors have indicated that the existing paper based voucher system for the Taxi Transport Subsidy Scheme is cumbersome for many people with disabilities. Do you think that the introduction of a card- based system would be a positive initiative?

Please find the following Additional Questions included:

1. Implementation of a universally accessible taxi that will accommodate all mobility aids?
2. Do you have any particular views about a way of overcoming this issue of the constant change of weight, size and shape of equipment for accessible public transport?



Ordinary People Ordinary Lives

3. Comment from past Taxi Transport Committee members about past initiatives and potential interest to reconvene.
4. Provide information regarding the costs of modifying a taxi that will accommodate mobility aids.

Regards Jordana Goodman

2010 NSW Taxi Inquiry – Questions on Notice

- 1) Your submission notes that ‘the main problem with WAT design is that not all WATs accommodate all wheelchairs’ and continues to note that there is an increasingly diverse number of mobility devices available (p.7). What impact does the lack of accessibility have on users of mobility devices? What measures can be undertaken to overcome these issues?

Part 40- Assumptions about Public Transport Mobility Aids, of the Commonwealth Disability Standards for Accessible Public Transport (DSAPT) Guidelines (2004) No.3, identifies the minimum standards for mobility aids, regardless of whether considering a manual wheelchair, motorised wheelchair, motorised scooter or any or disability aid.¹

Section 40.1 - Criteria for mobility aids in Disability Standard Guidelines

- **Weight** The total weight to be supported by a boarding device needs to be not more than 300 kg
- **Width** The overall width of the mobility aid needs to be less than 800 mm.
- **Head height** Until 31 December 2012, the maximum door clearance into a taxi is 1400 mm while the internal head height is 1410 mm. These heights both increase to 1500 mm after that date
- **Maneuverability** The mobility aid would need to be capable of turning through 180 degrees within an area of 2070 mm by 1540 mm
- **Allocated space** The space for stationary mobility aids is 800 mm wide by 1300 mm long
- **Wheels** A mobility aid should be able to:
 - (a) cross a horizontal gap up to 40 mm wide; and
 - (b) mount a vertical rise (bump) up to 12 mm; and
 - (c) cross grating gaps up to 13 mm wide and 150 mm long
- **Brakes** Mobility aids need to have effective braking systems to maintain stability and be able to withstand acceleration, braking, cornering and pitching of conveyances
- **Anchoring devices** If anchoring devices are required by regulation, mobility aids need to be able to accept and travel with anchoring devices fitted
- **Ramps** Mobility aids should be able to negotiate:
 - (a) a 1 in 14 ramp unassisted; and
 - (b) a 1 in 8 grade where the ramp is less than 1520 mm
- **Batteries** Electric mobility aids may need to comply with regulations governing the carriage of batteries on public transport. Batteries need to be adequately secured while gel or solid state options should be considered

¹ Australian Government, Attorney General's Department - Disability Standards for Accessible Public Transport (DSAPT) Guidelines (2004) No.3

For people accessing Wheelchair Accessible Taxis (WATs), complaints include;

- Inability to sit comfortably due to limited head room, minimising the passenger's ability to maneuver, and limited wheelchair space for passengers with unusual medical conditions who may need to keep their legs in an elevated position permanently. If a rectangular prism measuring 1300mm X 800mm X 1410mm was adopted as part of the allocated space in all WAT vehicles, comfort and maneuverability would not be compromised.
- Inadequately securing the wheelchair to the floor of the vehicle.

Currently the Standards require a minimum head height of 1400mm at the rear door, and 1410mm for the full length of the allocated wheelchair space. Mobility standards produced by Zero200 fail to include the requirement for the elevated head room of 1410mm in the allocated wheelchair space. And hence fail to consider the needs of the passenger and are subsequently contrary to the DSAPT.² Nor does this specification refer to the need to provide a rectangular prism within the wheelchair allocated space.

It needs to be recognised that this is in the allocated wheelchair space where passengers spend a significant amount of time and hence need to be as comfortable as possible. Furthermore as from 2013 all modes of transport will need to provide at least a minimum of 1500mm for both the door clearance and internal space.

Data from the Australian Bureau of Statistics points to a significant growth in the use of motorised scooters with a decline in both manual and electronic wheelchairs. Between 1998 and 2003 there was a 78% increase in the number of motorised scooters being used, with a 6% decline in manual wheelchair use and a 23% decline in electronic wheelchair use. Currently it is estimated that there are 100,000 motorised scooters in Australia.³ With these trends, it is clear that all modes of accessible public transport need to be sought and fitted for all types of mobility aids.⁴

Since the inception of WATs in the early 1980's, government bodies and the taxi industry have focused on servicing people in wheelchairs, rather than people in motorised scooters. PDCN understands that for some people with physical disability, motorised scooters are more versatile than electric wheelchairs, in that motorised scooters go faster, and can be driven on the road or footpath whatever most appropriate. Though PDCN is concerned about data illustrating the high number of injuries and deaths involving motorised scooters, and subsequently believes that taxi transport should be available to users of wheelchairs and users of motorised scooters.

For passengers in four wheeled motorised scooters, these motorised scooters are often too heavy to be lifted into the taxi or may not fit into the allocated space, and then can't be secured appropriately to the anchor devices. Three wheeled motorised scooters are often unstable and can't easily be secured to the ground because the anchor points are located differently than those commonly fitted for wheelchairs.

² NSW Taxi Council, About Us Zero200 Wheelchair Accessible Taxis

³ Sydney Morning Herald, Drive Life. Saturday 27 February 2010, Pages 8- 9

⁴ The Allen Consulting Group – Draft Report in to the Review of Disability Standards for Accessible Public Transport (2007)

In Australia many transport providers appear to be reluctant when considering carriage of people in motorised scooters resulting in considerable inconsistency in service provision. Some taxi networks require passengers to transfer from their motorised scooter to a regular passenger seat for the duration of the taxi trip. Taxi transport in the U.K, provides transport to passengers in motorised scooters as long as the motorised scooter meets the minimum standards.

Without the adoption of the Review into the Accessible Public Transport Standards (2005) and with the demise of the former National Scooter Policy Advisory Group (A sub-committee of the Accessible Public Transport National Advisory Committee) it is difficult to anticipate government initiatives or/and recommendations, and hence difficult to provide advice on this issue. Although recommendations from these sources can not be provided, the Accessible Public Transport National Advisory Committee has produced a brochure providing clarity on the minimum requirements contained in the Transport Standards for passengers using mobility aids on public transport. PDCN recommends greater promotion of this brochure so that transport providers in NSW are familiar with their responsibilities. ⁵

Information provided in the following table identifies the different program and incentives across Australia. ⁶

⁵ Queensland Government - Safer Travel for Passengers using Mobility Aids on Public Transport

⁶ Australian National University, Professor Des Nicholls – Transporting the Wheelchair Dependent, A Review of the Wheelchair Accessible Taxi Industry (2007)

State/ Territory	Lift Fee/Bonus	Maximum age of vehicle	Discounted WAT leases	Price of perpetual WAT licences	High- Occupancy tariff may be applied	Other Incentives
ACT	\$10*	10 years (WATs), 8 years (standard)	\$1000/yr.	-	Higher tariff when carrying 6+ passengers	-
New South Wales	-	10 years (WATs), 8 years (standard country), 6 years (standard Metro).	\$1000/yr (metro), free in country Areas.	-	-	Loan scheme to purchase country Taxis. Funding for additional training for WAT Drivers.
Victoria	\$10, of which at least \$6.70 must go to driver	10.5 years (WATs), 6.5 years (standard metro taxis)	Country WATs leased at 50% discount to standard country taxis	Metro WAT licences trade at a discount on the open market	Higher tariff when carrying 6+ passengers	Networks may offer a \$1/km dead- running payment for WAT jobs**
South Australia	On-time Bonus of \$5 to drivers for bookings within 31 mins.	8 or 10 years for WATs, as opposed to 6.5 years for conventional taxis	-	WAT licences trade at a discount on the open market	-	Direct Payment to WAT networks. On-time bonus (\$0.50 to \$1) paid to networks
Tasmania	\$10-16 depending on region	10 years (WATs), 8 years (standard)	Free 10 year non- assignable, transferable licences	-	Higher tariff when carrying 5+ passengers	Higher WAT tariff for wheelchair bookings
Western Australia	-	10 years (WATs), 8 years (standard)	\$100/wk (WATs), \$250/wk (standard)	-	-	Pays the training costs of up to 10 WAT drivers
Northern Territory	-	8 years (WATs), 6 years (standard)	50% concession on WAT lease fee to standard lease fee	-	-	-
Queensland	-	8 years (WATs), 6 years (standard)	-	WAT licences trade at a discount on the open market***	Surcharge may be applied when pre- booked	-

2. Based on your experience, do you believe the WAT Taxi Driver Incentive Scheme has resulted in better transport services for people in with a disability?

As a person with a severe physical disability, I believe that the WAT Taxi Driver Incentive Scheme provides a greater incentive in the more isolated parts of the Sydney Greater Metropolitan area, where a taxi driver may need to spend large amounts of time vacant, such as in:

- Penrith
- Parramatta
- Liverpool
- Campbelltown
- Camden
- Northern Beaches

Subsequently drivers of WATS are less common in the locations identified above and consequently response times for WATs are often greater.

In comparison to other states of Australia, when considering the proportion of WATs located in metropolitan centres, Sydney has only 8.1% of WATs per total fleet. In 2007 nationally variations ranged from 5.9% in Western Australia to 18.6% in Northern Territory. The amount of WATs in Western Australia is low probably because the WAT fleet only includes WAT vans, but not 'people movers'.

No. of Wheelchair Accessible Taxis (2007) ⁷

	NSW	Vic.	QLD	South Aust.	West. Aust.	Tas.	NT	ACT
% of WATS per total fleet	9.9%	8.1%	15.2%	7%	6.3%	7.8%	18.8%	5.2%
Metro.	8.1%	6.4%	14.1%		5.9%	10.1%	18.6%	
Rural	17.2%	13.2-16.1%	8.6-18.1%		7.4%	0-9.4%	10-24.1%	

3. Several submission authors have noted that the value of the Taxi Driver Incentive Scheme does not adequately cover the increasing costs of taxi transport. Do you believe that a sufficient subsidy is provided by the scheme?

As noted above PDCN believes that the Taxi Driver Incentive Scheme does assist in the more isolated parts of Sydney where WATs are fewer. PDCN believes that the State Government urgently needs to review the Taxi Transport Subsidy Scheme as it was last reviewed in 1999, and needs to provide a mechanism where this subsidy is regularly

⁷ The Allen Consulting Group – Draft Report in to the Review of Disability Standards for Accessible Public Transport (2007)

reviewed, every five years to account for increases in inflation. PDCN believe that this subsidy needs to be increased from 50% of the taxi fare to 75% and that the upper limit of the subsidy to be increased from its current \$30 to \$50.

"In real terms taxi fares are more expensive than they were a decade ago. NCOSS estimates that since 1998/99 taxi fares are approximately 15% higher: in other words, taxi users now pay \$4.91 more *in real terms* than in 1998/9 for each average return trip in a taxi. It is likely that this increase in cost has had an adverse impact on low income users, and people reliant on taxis because of a lack of other suitable alternatives." ⁸

Due to the significant financial costs associated with having a severe physical disability, the current concession is inadequate. For all members of the community, transportation is fundamental, to access employment, an education, recreation, to visit friends and family, shop and conduct regular activities of daily living. In a Specific Issue Consultation participants indicated that they minimised their activities due to the cost of taxi travel, and in effect risked social isolation particularly in the more rural parts of NSW.

Whilst people with disabilities have no other choice but to use taxis and subsequently pay taxi fares, other members of the community pay significantly less to use public transport, and additionally have greater flexibility in regard to different number of ticketing regimes. The difference between the costs of utilising public transport, as opposed to taxi fares will vary quite significantly. A person with a disability, who works 4 days per week and travels 4 kames from home to work, would pay at least \$3,000 annually if travelling by taxi, and \$1,000 if travelling by bus.

- 4 Several submission authors have indicated that the existing paper based voucher system for the Taxi Transport Subsidy Scheme is cumbersome for many people with disabilities. Do you think that the introduction of a card-based system would be a positive initiative?**

Findings from a study conducted by the Victorian Equal Opportunity and Human Rights Commission and the Victorian Taxi Directorate indicated that 1:4 passengers using WATs may be unable to obtain funds from their wallet or purse, and/ or unable to complete the paperwork and as a consequence needed assistance from the taxi driver. ⁹ Introduction of an electronic payment has the potential of minimising the risks associated with another person extracting items from a person's wallet or purse.

Additionally the risk of fraud would be minimised with the introduction of a card, as taxi drivers would be less able to forward more than one docket per trip, or divide one trip into a number to obtain the taxi driver incentive payment on numerous occasions.

⁸ Council of Social Service NSW, IPART Taxi Fare Review – 2007

⁹ Victorian Equal Opportunity and Human Rights Commission and the Victorian Taxi Directorate, Quality of Taxi Services for Passengers with Disabilities – A Report of Research Findings (2006)

2010 NSW Taxi Inquiry – Additional Information

1. Implementation of a universally accessible taxi that will accommodate all mobility aids?

With an ageing population it will become increasingly important that all modes of transport provide universal access. With an ageing population the availability of mobility aids has increased with an increase in the variety of different types. Mobility aids include the following categories:

- Buggies, prams or push chairs
- Attendant-propelled wheelchairs
- Manual wheelchairs for either children or adults
- Powered wheelchairs for either children or adults
- Motorised scooters for either children or adults

The Review of the Disability Standards for Accessible Public Standards (2007) identifies concerns regarding the safe carriage of passengers using mobility aids in taxis, for both the passenger and the taxi driver. Due to the autonomy of the taxi industry, PDCN believes that a national regulatory body needs to be established to further investigate issues concerning the safe carriage of passengers who use mobility aids. The Queensland Department of Transport also comments on this need by saying: 'Whilst the Transport Standards provide detail regarding the dimensions (relating to boarding devices for example, ramps, and wheelchairs and motorised scooters able to be carried on public transport); stability requirements and maneuverability requirements of mobility aids on public transport, without any nationally consistent certification system, there is no way for bus/taxi drivers to ascertain instantly whether the aids comply with these requirements'.¹⁰

Recent advice provided by the Queensland Department of Transport to taxi networks illustrates the relevance of these concerns:

1. The structural characteristics of the motorised scooter are different to the characteristics of a wheelchair; in particular motorised scooters differ from wheelchairs in relation to the seats. Motorised scooters have seats that are designed to be removable from the main body of the motorised scooter and can generally swivel and be height adjusted. Conversely, wheelchair seats are an integral part of the wheelchair and are not subject to the same flexibility found with respect to motorised scooter seats.
2. There are only generally three anchorage points on a motorised scooter compared to four anchorage points for a wheelchair. The anchorage points are

¹⁰ The Allen's Group, Draft Review into the Disability Standards for Accessible Public Transport Page 58, (2007)

the most important aspect of safely carrying mobility aides in wheelchair accessible taxis.

3. The steering column of a motorised scooter is dangerous whilst in a moving taxi due to it being too close to the passenger and not sufficiently secure.¹¹

Before the introduction of a universally accessible vehicle, PDCN would recommend the adoption of a national regulatory body to investigate and clarify issues of concern:

- Consider the design of different mobility aids,
- Investigate safety issues in reference to the Transport Standards and other regulatory frameworks,
- Study customer need,
- Identify appropriate taxi vehicle, and
- Explore the financial viability of acquiring a universally accessible taxi.

Implementation of a universally accessible taxi could be achieved by replacing a regular taxi with an accessible taxi once the regular taxis can no longer be driven as a taxi, after ten years. Therefore, if 500 regular taxis were replaced per annum, the entire taxi fleet would be accessible within ten years.

- 2. Do you have any particular views about a way of overcoming this issue of the constant change of weight, size and shape of equipment for accessible public transport?**

PDCN would recommend a review with a feasibility study every 20 years to ensure consistency between improvements in vehicular design, and technological advances in mobility aids. A similar study has recently been completed by the Mobility and Inclusion Unit of the UK Department for Transport where they measured the following nine dimensions on more than 1,300 individuals:

1. Height of device and occupant;
2. Length of device and occupant;
3. Width of device;
4. Weight of device and occupant;
5. Wheelbase of device;
6. Height of armrest or device controls;
7. Distance between device handles;
8. Angle of the front wheel to the front of the device (wheelchairs only);
9. Angle of the rear wheel to the rear of the device (wheelchairs only).¹²

¹¹ Queensland Department of Transport, Townsville Taxis
http://qldtaxi.com.au/index.php?option=com_content&task=view&id=52&Itemid=75 25/2/2010

¹² UK Department of Transport - Mobility and Inclusion Unit (2006) A study of occupied wheelchairs and scooters

These findings were compared to a previous survey conducted in 1999, and showed that there have been significant increases in height, weight and length but a significant decrease in width.

3. Comment from past Taxi Transport Committee members about past initiatives and potential interest to reconvene.

Due to the autonomy of the taxi industry, PDCN would recommend the resumption of the NSW Wheelchair Accessible Taxi Taskforce to address ongoing issues such as:

- Availability of wheelchair accessible taxis in isolated parts of metropolitan Sydney and certain regional parts of rural NSW,
- Performance indicators and response times,
- Taxi design and mobility specifications,
- Complaints mechanisms,
- Provision of the Taxi Transport Subsidy Scheme
- Taxi Driver Incentive Scheme
- Taxi licensing
- Electronic Payment Scheme for Taxi Transport Subsidy Scheme recipients

4. Provide information regarding the costs of modifying a taxi that will accommodate mobility aids.

Please find attached pages 109- 116 from the 2008 IPART Review of Taxi Fares in NSW

10 | Wheelchair accessible taxis

In other public transport industries, the costs associated with complying with accessibility obligations for people with disabilities are generally borne by the industry or service provider in the first instance and can then be ultimately spread across all passengers through higher priced services. The current fare setting process prevents this from happening in the taxi industry, as the costs associated with providing wheelchair accessible taxis (WATs) are excluded from the TCI, which captures the costs of a typical taxi only. However, these costs are mitigated by a number of Government initiatives provided in relation to WATs (such as heavily discounted or free licences), the benefits of which are also excluded from the TCI (for example, fares are based on the licence costs of a standard taxi, not the heavily discounted WAT licence).

In December 2007 the Ministry of Transport introduced a six-month trial incentive payment to drivers of \$8.47 per passenger picked up. The trial incentive payment is currently being funded at no cost to passengers through a levy on operators, (the Taxi Advisory Committee fund).⁵⁸ This approach to funding is unlikely to be sustainable. As a result, if the current incentive payment is extended, alternative means of funding may need to be identified. The Government will need to decide what level of incentives is required to ensure appropriate standards of service for users of WATs, and how any incentives should be funded.

As part of this review, IPART considered whether it should recommend including any additional costs associated with WATs in the TCI (and thus in fares). In the Issues Paper, IPART sought stakeholder feedback on two options for funding WAT incentives, including:

- ▼ incorporating the annual estimated cost of providing incentive payments into the TCI
- ▼ increasing taxi fares by a defined amount (such as, an increase in the booking fee or flag-fall) for all passengers.

Under both approaches all passengers would pay higher fares, although the increase may be minimal when spread over all trips, which could be collected from the industry via an increase in the levy on all taxi operators and then transferred to those providing the WAT service.

⁵⁸ IPART, 2008 *Review of Taxi Fares in NSW – Issues Paper*, February 2008, p 47.

The section below summarises IPART's draft decision on this issue. The subsequent sections discuss the analysis that underpins this decision, including IPART's consideration of stakeholder views.

10.1 IPART's draft decision

IPART's draft decision is not to recommend making an allowance for a WAT incentive payment at this stage. The trial incentive payment currently in place has not yet been evaluated and IPART may reconsider the introduction of fare funded incentive payment once the results of this trial are available.

10.2 Costs associated with WATs that are not already recovered

Currently, most of the incentives available in NSW are subsidies aimed at reducing the up-front costs associated with WATs. Some of these subsidies provide significant benefits (for example, heavily subsidised licences). There are also some additional measures to mitigate the more direct cost built in to the current structure through allowing drivers to charge the waiting time rate for the time spent assisting passengers into the taxi. The level of the waiting time rate is more than double the hourly driver labour cost included in the TCI and as a result is likely to provide sufficient compensation for drivers for both loading and unloading passengers.

The PwC survey did not provide robust enough information to allow IPART to estimate WAT costs. This is partly because WATs make up a small proportion of total taxis in NSW (around 10 per cent), so the number of respondents providing data on WAT costs was not significant.

The ATDA submitted that WATs were up to twice as expensive to operate as a standard taxi.⁵⁹ However, the Taxi Council noted that WATs were able to stay on the road for twice as long as standard taxis. Both these stakeholders also claimed that additional costs to drivers constituted reduced numbers of street hails, increased dead running time to pick up passengers and higher fuel costs.⁶⁰ However, the Taxi Council noted that the issues are complicated and it is difficult to assess what level of compensation is needed.

The data provided in submissions from the taxi industry suggested that WATs in NSW tend to earn less revenue than standard taxis, but the Taxi Council noted that this was not necessarily based on higher costs, but often resulted from other obligations such as regulated changeover times. The Ministry of Transport has advised that it is currently reviewing the changeover conditions for WATs, which were originally established to maintain availability during the afternoon shift change period, to improve rates of double-shifting WATs for improved availability at all times.

⁵⁹ ATDA submission, March 2008, p 15.

⁶⁰ ATDA submission, March 2008, p 15; NSWTC submission, March 2008, pp 30-31.

10.3 Level of service for WATs

From December 2007, the Commonwealth Disability Standards for Accessible Public Transport require response times for WATs to equal those of standard taxi services. Service standard statistics for urban networks up to December 2007 showed that response times for bookings made via the Zero200 network were 9.24 minutes, compared with 8.19 minutes on all other networks.⁶¹ Overall in 2007, the Zero200 network showed an improvement in KPIs compared to 2006. These improvements are borne out by the fact that the level of service provided by WATs was not the key concern raised by submissions as it has been in previous years.

However, it is clear that some passengers are still not receiving an adequate level of service. For example, at the public hearing David Cunningham stated that:

...my experience has been that the average waiting time for a WAT for me has been around four hours. I am constantly missing from my trips, from my social occasions, or whatever one calls it, because of the transportation issue.⁶²

Submissions indicated that service standards depend heavily on geographical area. For example, areas with a high proportion of WATs compared with other taxis do not experience problems with service levels, whereas passengers in some other areas have a great deal of difficulty. To some extent, those with poor levels of service have responded by making private bookings directly with drivers.⁶³

10.4 The need for additional incentives

The available information on cost and service levels suggests that additional incentives may not be necessary. Service levels have certainly improved for WATs over the past 12 months, and this may have resulted in part from the trial incentive payment. Unfortunately seasonal variability in performance data makes a direct comparison difficult as only one full month of data with the incentive payment in place is available at this stage.

In its submission the ATDA argued that there should be a WAT incentive payment valued at \$25 because drivers not only had to be compensated for higher costs, but also receive an incentive to take WATs bookings. The Taxi Council supported an incentive payment in principle but submitted that the appropriate value cannot be determined until after the results of the current trial are known.⁶⁴

There was not strong support from WAT passengers for the introduction of a permanent incentive payment for drivers funded through fares. In fact, a number of

⁶¹ Information provided by the Ministry of Transport, March 2008.

⁶² Mr David Cunningham, IPART Public Hearing, 11 March 2008, pp 34-35.

⁶³ Mr David Cunningham, IPART Public Hearing, 11 March 2008, pp 34-35; PDCN, IPART Public Hearing, pp 32-33.

⁶⁴ NSWTC submission, March 2008, p 33.

stakeholders did not consider that driver incentive payments are appropriate at all, and particularly if it would raise the general level of fares.

Passengers suggested that demand for WATs is highly price sensitive. Faced with high fares, many people in wheelchairs are forced to reduce the number of taxi trips they make. The Physical Disability Council of NSW (PDCN) suggested that a driver incentive funded through higher fares would reduce the uptake of WATs by the industry because of the lower demand for WAT services.

Given the limited level of stakeholder support for an incentive payment subsidised through fares, and the view put to IPART by stakeholders that poor WAT response times tend to be very localised, IPART does not propose to recommend making an allowance for a WAT incentive payment in its fare recommendations at this stage. Given that the results of the incentive payment trial are not yet available and the full impact of the trial on service outcomes will not be available until next year's fare review, IPART may reconsider the introduction of fare funded incentive payment once the results of the trial are available.

10.5 Other issues related to WATs and transport for passengers with physical disabilities

While the majority of stakeholders do not support additional incentive payments, they raised a number of other concerns that IPART. While these concerns are generally outside the scope of IPART's review, IPART has given each issue some consideration. Specifically, IPART has considered whether it can address concerns raised regarding:

- ▼ the impact of uncertainty regarding renewal of WAT licences on the uptake of WAT licences
- ▼ the subsidy level of the Taxi Transport Subsidy Scheme (TTSS)
- ▼ the potential for concessional or zero booking fees for WATs.

10.5.1 Issues raised in relation to WAT licences

The PDCN stressed the importance of raising the proportion of WATs to standard taxis, and argued for a universally accessible taxi fleet.⁶⁵ Data provided by the Ministry of Transport showed that there was a 28 per cent increase in the number of WAT taxis operating on the Zero200 network from 2006 to 2007⁶⁶ and a 20 per cent increase in the number of WATs across NSW. The proportion of WATs as a percentage of the total taxi fleet in Sydney, Newcastle and Wollongong is now over 8 per cent⁶⁷ and has increased to 10 per cent of the total taxi fleet in NSW.

⁶⁵ Physical Disability Council of NSW (PDCN) submission, March 2008, p 8.

⁶⁶ Information provided by the Ministry of Transport, March 2008.

⁶⁷ Information provided by the Ministry of Transport, March 2008.

Submissions from industry participants argued that the uptake of WAT licences is limited by the current approach to issuing and enforcement. Currently the Ministry of Transport issues WAT licences on a one-year basis so that compliance can be monitored and licences can be revoked if the Ministry is not satisfied that priority is being given to WATs bookings.

Submissions argued that greater clarity regarding the process and criteria that will be used to assess compliance with the regulatory obligations on WAT licences is needed. The Taxi Council put the view that operators and drivers are uncertain about whether they can demonstrate that they have met the regulatory obligations to prioritise passengers in wheelchairs.⁶⁸ Both the Taxi Council and ATDA submitted that the current arrangements are a deterrent for prospective WAT licensees, who must invest in expensive wheelchair accessible vehicles and undergo appropriate driver training up-front.⁶⁹ However, it is acknowledged that in order to support the services for which WATs are licensed at significant discounts in licence fees, that there must be an effective enforcement and compliance regime to ensure services are in fact delivered.

This issue is outside the scope of IPART's terms of reference for this review and are a matter of Government policy, so it has not been able to address it. However, as noted in Chapter 2, IPART considers that it may be timely to undertake a comprehensive review of the industry structure and regulations imposed to fully address these types of issues.

10.5.2 The Taxi Transport Subsidy Scheme (TTSS)

The fare relief scheme in place in NSW, is funded by the NSW Government and known as the Taxi Transport Subsidy Scheme (TTSS). The TTSS is administered by the Ministry of Transport and provides eligible participants who have a qualifying severe and permanent disability with a 50 per cent subsidy for the metered fare, up to a maximum value of \$30 per trip. There are no limits on the number or purpose of trips undertaken with this subsidy.

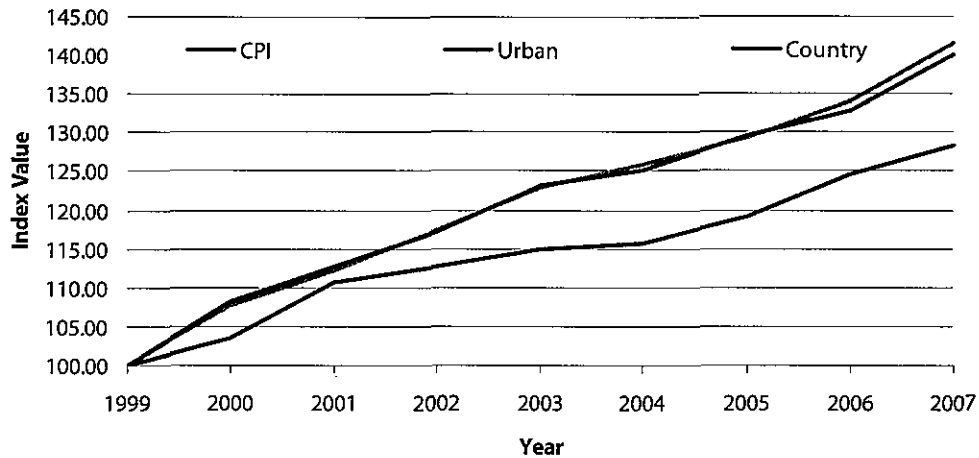
Submissions from WATs users strongly urged IPART to consider the impact of fare increases in light of the fact that the TTSS has not been reviewed for a number of years and to recommend to Government that the TTSS rate be increased.⁷⁰

The level of the TTSS subsidy has not changed since 1999, when the cap was increased from \$25 to \$30. Over this time, taxi fares in NSW have increased by slightly more than 40 per cent in both urban and country areas. The increase in the CPI has been around 28 per cent over the same period (see Figure 10.1 below).

⁶⁸ NSWTC submission, March 2008, pp 29-30.

⁶⁹ NSWTC submission March 2008, p 29; ATDA submission, March 2008, p 16.

⁷⁰ PDCN submission, March 2008, pp 8-9; Mr Bob Douglas submission, February 2008, p 1; Mr Greg Killeen submission, March 2008, p 2; Mr David Cunningham submission, February 2008, p 1.

Figure 10.1 Index of fare increases for taxis since 1999

Data source: IPART Reports and ABS Data.

There was a strong message in submissions that WATs passengers, who tend to be on fixed incomes, are struggling as a result of the large real increase in taxi fares.⁷¹ The PDCN submitted that the average trip for people in wheelchairs is longer than for able bodied passengers, implying higher fares.⁷² Submissions also noted that a lack of access to other public transport means that mobility impaired passengers have limited alternatives.⁷³

There was also concern in submissions that increases to the cap on the subsidy alone may not address the real concerns of passengers. This attitude was reflected by stakeholders in statements made at the IPART public hearing.⁷⁴ Stakeholders suggested that consideration should be given to increasing the percentage rebate offered by the TTSS from the current 50 per cent⁷⁵ to ensure that the TTSS adequately takes into account the impact of fare increases of the last 10 years. Stakeholders also argued that a higher subsidy would be likely to encourage passengers in wheelchairs to make more taxi trips, and that the higher utilisation of WATs services may also have a flow-on effect on service levels by encouraging greater up-take of WAT licences.⁷⁶

The TTSS subsidy in NSW is comparable to similar subsidies in other states, in particular to Queensland and Victoria, in terms of both the level of the cap and the percentage of fare rebated to passengers. However, as noted in Chapter 7, NSW taxi

⁷¹ Mr Bob Douglas submission, February 2008, p 1; PDCN submission, March 2008, pp 8-9; NCOSS submission, March 2008, p 1.

⁷² PDCN, IPART Public Hearing, 11 March 2008, pp 31-33.

⁷³ PDCN submission, March 2008, p 6; PDCN, IPART Public Hearing, 11 March 2008, pp 31-33; Mr Greg Killeen, IPART Public Hearing, 11 March 2008, pp 36-37.

⁷⁴ Mr Greg Killeen, IPART Public Hearing, 11 March 2008, pp 39-40.

⁷⁵ PDCN submission, March 2008, pp 8-9; Mr Greg Killeen submission, March 2008, p 2; Mr Greg Killeen, IPART Public Hearing, 11 March 2008, pp 37-38.

⁷⁶ PDCN, IPART Public Hearing, 11 March 2008, pp 31-33.

fares do tend to be higher than those in other states. Table 10.1 sets out the assistance measures in other states.

Table 10.1 Comparison of assistance measures across Australia

	Percentage of fare	Level of cap
New South Wales	50%	\$30
Tasmania	60%	\$30
Victoria	50%	\$30
Queensland	50%	\$20

Source: IPART, *2008 Review of Taxi Fares in NSW – Issues Paper*, February 2008, pp 32-42.

While the level of the TTSS is a matter for Government and is outside IPART's terms of reference, the issues raised in submissions are important. IPART has been advised that the Ministry of Transport is currently reviewing the TTSS and the administrative arrangements surrounding it. IPART hopes that the information provided above will assist the Ministry of Transport with its review.

10.5.3 Concessional or zero booking fees for WATs

Since WATs passengers find it difficult to hail a WAT or any taxi, they are subjected to a booking fee each time they wish to travel.⁷⁷ Individual submissions highlighted concerns that the effects of paying for tolls, booking fees and surcharges on credit use were tough on fixed income earners.⁷⁸

Submissions proposed an alternative option to making travel more affordable for WATs passengers – eliminating tolls, surcharges and booking fees altogether for WATs passengers.⁷⁹ To cover the costs of providing these services from fares, the booking fee for non-WAT passengers would need to increase.

IPART considers that removing the WAT booking fee and raising the non-WAT booking fee is likely to lower the incentive to WAT drivers to pick up passengers in wheelchairs compared with other passengers. This would be an unsatisfactory outcome. Transferring the WAT-related booking fee to drivers/operators undertaking WAT work would also have administrative costs as there is currently no system set up to do this. For these reasons, IPART does not support providing passengers in wheelchairs with an exemption from tolls, booking fees or surcharges as a means of alleviating the impact of fare increases.

⁷⁷ PDCN submission, March 2008, p 6.

⁷⁸ PDCN submission, March 2008, p 6; Mr David Cunningham, IPART Public Hearing, 11 March 2008, pp 34-35.

⁷⁹ Mr David Cunningham, IPART Public Hearing, 11 March 2008, pp 34-35.