

The Director
Select Committee on the NSW Taxi Industry
Parliament House
Macquarie St
Sydney NSW 2000
Fax: 02 9230 2981

T. J. Hirsch

1 March 2010

Dear Sirs,

RESPONSES TO QUESTIONS FROM THE PARLIAMENTARY INQUIRY HEARING

Thank you for your 8 February 2010 letter and to the Inquiry for its further questions. Please find herewith the requested Responses on the ten Recommendations of the Taxi Council Ltd Submission. These Responses are to the Questions during the Parliamentary Inquiry Hearings on 4 February 2010 from The Hon. Trevor Khan at pages 16 & 17 of the Transcript of Ted Hirsch as forwarded by the Inquiry.

The hearing suggested that the Responses may be prepared individually or in concert with others, referring to the NSW Taxi Drivers Association. As a result the NSW TDA was invited, emails were exchanged and a joint editing meeting held, but regrettably, due to "some technical difficulties with its production" by the TDA, a joint submission has not eventuated.

Accordingly, the Responses herewith are the opinions of and submitted by Ted Hirsch. They are not confidential.

It is noted that the Responses 1 to 10 are not page numbered.

Trusting that the Responses will be of assistance to the Inquiry,

Yours Sincerely,

Ted Hirsch
Member NSW Taxi Drivers Association

RESPONSES TO INQUIRY QUESTIONS – TED HIRSCH

TC Ltd Recommendation 1. (Aust Standard design for wheelchairs.) *In the interests of Passenger and driver safety, a Australian standard be developed for mobility devices including wheelchairs that are suitable for use in public transport vehicles that comply with the Disability Standards for Accessible Public Transport.*

Response :

- A. These are highly specialised disability issues best addressed by experts.
- B. It seems reasonable that there should be some clear definitions as to what size and standard of wheelchair that a common carrier should be obliged to cater for.

TC Ltd Recommendation 2. (Electronic Card system for TTSS payments.) *A card-based electronic payment system be introduced soon as possible to replace the paper-dockets being used for the Taxi Transport Subsidy Scheme.*

TC Ltd Reasons :

- 1. Effectiveness of WATS incentive scheme “ is hampered by inefficiencies in the method of processing and handling payments. The scheme is paper-based and means dockets are handed along a chain from the taxi driver to the taxi operator to Cabcharge to NSW T&I. Payments are then sent in the reverse direction along the same chain.” (TC Ltd Submn page 22)
- 2. Problems are “exacerbated by the fact that payments by NSW T&I rely on validation of the dockets..” (TC Ltd Submn page 23)
- 3. “Furthermore, a card-based system would eliminate opportunities for TTSS fraud arising from the use of paper-based dockets.” (TC Ltd Submn page 23)

Response :

- A. In principle the Recommendation is supported. Potentially, a plastic card based system, if it can be made to work reliably, would have some advantages over dockets.
- B. To maximize fraud reduction and use by other persons the cards should have photo ID as in Queensland.
- C. However it is not clear how the payment ‘chain’ is shortened or expedited by a card-based system, nor how validation processes are reduced.
- D. The paper TTSS dockets incur no extra surcharges. Importantly, and in fairness, a card-based system should not incur any additional Eftpos surcharge costs to the disabled.
- E. Nor should such cards be permitted to become another Cabcharge monopoly. Such cards should be processable by all EFTPOS terminals approved by the MoT for use in taxis.

TC Ltd Recommendation 3. (Eftpos to be attached to meter for driver details on receipts.) *A regulation be introduced to stipulate that EFTPOS devices must be attached to the taxi-cab and taxi*

driver details entered at the start of a shift in such a manner as to ensure that correct identification details of the taxi cab, authorised taxi network, taxi driver ID and taxi driver ABN are printed on all receipts issued.

TC Ltd Reasons :

1. "One area of potential weakness in relation to the accountability of taxi drivers is the ability for customers to identify the vehicle in which a journey was undertaken based on receipts issued from an EFTPOS machine that is not 'attached' to the taxi-cab it is used in." (TC Ltd Submn page 25)
2. "...a way of helping to improve confidence of the public in using taxis." (TC Ltd T'SCRIPT page 5)

Response :

- A. Any TC Ltd proposal begs the question of Cabcharge interests. In this instance it is understood that Cabcharge is the only system capable of this proposed interface with the meter, thus potentially eliminating other Eftpos equipment suppliers.
- B. In fact the confidence of customers is very high according to the TC Ltd evidence to the Inquiry as to the low level of complaints.
There seems no need for a regulation to solve a problem that doesn't exist.
- C. This recommendation is puzzling because presently taxis numbers and Driver Authority numbers are required to be entered into the Eftpos machine at the shift start. This information then appears routinely on the Eftpos receipts.
- D. In addition, for all passengers including those paying cash, all taxi numbers are very clearly identifiable. And all drivers must display their Driver Authority card on the taxi windscreen. In the event of a passenger having taken only the taxi number, the driver ID can be obtained via the radio network.
- E. As the Eftpos fare payments do not go to the driver, who is not the merchant, it is curious that his ABN details should be demanded in the TC Ltd submission.
- F. There appears to be little reason for an EFTPOS to be elaborately and expensively 'attached' for the driver accountability and vehicle identification cited by TC Ltd.
- G. It is noted that attachment to the meter is not possible with a number of handheld Eftpos machines which are becoming increasingly popular because they pay some part of the 10% surcharge to the drivers. These devices would be removed from market competition.
- H. Attachment of the Eftpos machines to the meter cements in a Cabcharge monopoly.

TC Ltd Recommendation 4. (Meters to record Tolls, booking fees, etc.) *NSW T&I fund the installation of toll-meter interface devices to record tolls on taxi meters and introduce a regulation to make such devices mandatory in Sydney taxis.*

TC Ltd Reasons :

1. "... the public benefit of such devices justifies the use of funds already collected from the industry through licence sales/leasing and operator accreditation fees by NSW T&I to fund the installation in all Sydney's taxis." (TC Ltd Submn page 26)

TC Ltd Recommendation 5. (Printed receipts to have all driver, taxi and toll details recorded.) *A regulation be introduced to make it compulsory for printed receipts to be issued upon request that contain the fare and toll details recorded from the taxi meter and identification from the EFTPOS*

machine to ensure the receipt contains unadulterated details of the taxi vehicle number, authorised taxi network, taxi driver ID and taxi driver ABN, time, date, location and itemised amounts for all fare components, extras and tolls.

TC Ltd Reasons :

1. "Passenger confidence... is undermined by the lack of detailed receipts that identify all items that have been charged for. ... such as radio booking fees, as well as road and airport tolls ..." (Submn page 25)
2. "The lack of itemised receipts leaves passengers vulnerable and gives rise to suspicion and complaints where passengers believe they have been overcharged." (TC Ltd Submn page 25)
3. "A receipt is not necessarily required, except under taxation laws for certain amounts. ... Again, it is all about improving public confidence." (TC Ltd T'SCRIPT page 6)

Responses to Recommendations 4 and 5:

- A. It is not evident that this is a major or urgent problem, or a source of fraud. TC Ltd has not provided any statistics to support the extent and seriousness of this problem, nor the need for an elaborate , complex, expensive proposed solution.
Which it proposes to be funded by the Government !
- B. Receipts are automatically provided for all Eftpos transactions at present. And for cash a printed eftpos machine receipt if requested. All drivers provide such receipts as a matter of course.
What is now the purpose of 'a regulation to make it compulsory' ?
- C. Tolls are added manually at present without difficulties. As are booking fees, or multi hire fees, tips, etc, which undoubtedly will always have to be added manually.
- D. Why is this TC Ltd proposal only for Sydney taxis ?
- E. This proposal appears to be cracking a small nut with a very expensive sledgehammer.
- F. It is understood that only Cabcharge can interface Eftpos and taxi meters.
Recommendation 5 appears to seek new regulation to also secure a Cabcharge monopoly.
Courtesy of Government funding !

G. Alternative approach : TOLL FREE TAXIS.

A constructive and positive alternative approach is to make all taxis Toll Free. Like all public transport buses and trains! And as per the "taxi public transport system" that the TC Ltd espouses strongly in its Submission.

Toll free taxis have many advantages and few disadvantages :

- Taxi passenger locals on the M5 and M4 (previously) would claim a toll rebate if driving their own car.
- Taxi passengers on the Harbour Bridge or M2 or Airport, etc, would not pay these tolls if they were using a bus - as they may often/usually do daily to and fro work . Nor do passengers on trains pay these tolls.
- The appropriate, but sometimes confusing, Harbour Bridge return toll issue would disappear.
- Taxi fare costs would be reduced to the benefit of the public, and to possibly marginally increased taxi usage. (Driver toll outlays and earnings would remain unchanged.)
-
- The taxi fare on all tollways would be simplified for pax and drivers.
- It eliminates the TC Ltd concern of 'undermining of pax confidence' by lack of toll details.
- It eliminates the TC Ltd concern of passenger 'suspicions' of overcharging of tolls etc.
- The opportunity for errors, and any TC Ltd 'concern for fraud', would be eliminated.

- Driver E-tag administration time and costs would be reduced, including E-tag failures.
- GST (wrongly) added on tolls as part of total driver earnings would be eliminated.
- The out of pocket costs of taxidriver quick return journeys along tollways would be reduced, return journey times shortened with more cabs available sooner at high demand areas and taxi services more efficient.
- Toll Free taxis are a simpler, less costly public transport arrangement for all !
- Without meter interfacing installation costs to the Government as TC LTD recommends.
- Cabcharge & tollways would suffer marginally reduced receipts.

TC Ltd Recommendation 6. (Trunk groups to be banned.) *Due to the threat posed by illegal trunk radio groups to the ongoing ability of the taxi industry to provide a true public transport service, the regulations regarding unauthorised communications equipment in taxi cabs be strictly enforced.*

TC Ltd Reasons :

1. "There are significant risks to the quality and reliability of service for passengers if regulations regarding networks are relaxed." (TC Ltd Submn page 33)
2. "Public safety is compromised due to the lack of any record linking the passenger to a driver and the lack of accountability can lead to price gouging and other undesirable or illegal behaviour." (TC Ltd Submn page 33/34)
3. "The problem that these groups pose ...is their ability to pick and choose customers ...This creates a distortion in the market and makes a mockery of any Key Performance Indicators and service delivery standards ..." (TC Ltd Submn page 33)
4. "Hand in hand with providing a universal service under a uniform pricing structure is the need to allow taxi drivers fair and equal access to passengers." (TC Ltd Submn page 34)
5. "If one of these fundamental principles is undermined then the economic structure of the industry is undermined and both drivers and passengers will suffer as a result." (TC Ltd Submn page 34)
6. "... but they do not have the burden of all the other regulatory requirements that apply to authorised taxi networks." (TC Ltd T'SCRIPT page 6)
7. "... if groups start to siphon off only the most profitable customers they are lost to the remainder of the fleet which, over time, will undermine the industry's ability to provide a true public transport service." (TC Ltd T'SCRIPT page 7)

Response :

- A. It is misleading for the TC Ltd (Reasons 1 & 2) to imply that those taxis with 'trunk' systems are in any way inferior in 'the quality and reliability of service for passengers' or that their 'Public safety is compromised'.
- B. All Sydney taxis, including trunk taxis, pay for and are linked to the authorised main radio booking/ despatch Networks (as represented by the TC Ltd). Accordingly, their pax have all systems of safety, lost property and complaints etc fully at their disposal. As have all taxi drivers including those trunk drivers.
- C. Trunk operators and drivers pay extra for their private trunk booking system. The trunk systems thrive because they provide a better and more reliable booking and pickup service. (As stated expressly in some submissions to the Inquiry by passengers.)

- D. Those operators and drivers joining and paying for a trunk service do so by commercial choice. Unlike their compulsory membership of the main radio bookings Networks.
- E. It is also misleading to infer that trunks 'siphon off only the most profitable customers' and so undermine the economic structure of the industry. The profitability of, say, a long fare accrues to the driver, no one else. The costs and revenues to the Network (or to the trunk system) are the same regardless of the customer and fare.
- F. The real issue is one of competition. Between the Networks represented by the TC Ltd and the trunk groups. (TC Ltd Reasons 4,5,6,7). Since the trunks' existence from the mid 90's, the Networks have attempted to abolish them by various means, blitzes, court action, regulation, etc. To date unsuccessfully, due to the strong customer demand for trunk services (as noted in the 2004 Cook Report.)
- G. It is questionable what the TC Ltd means by the 'ongoing ability of the taxi industry to provide a true public transport service'. It is however clearly evident that Network booking/despatch services to pax and drivers have been in serious decline for some years. It appears that the Networks booking/despatch services, if not other aspects, are commercially unsustainable and that fundamental reform is needed.
These issues and a Single Sydney Network is canvassed in Inquiry Submission No54 by Ted Hirsch, Section 2.04.
- H. Meanwhile, there is an important argument that the trunk groups provide the only real competition and pressure for the main Networks to try to maintain or improve their services.

TC Ltd Recommendation 7. ("Premium service Fee" to be allowed.) *The feasibility of a regulated "premium service fee" for customers who make a fully informed choice for a higher level of service than can be provided for the "normal" fare be investigated. A pre-condition is that it not detract from service levels provided to customers who do not opt for premium services.*

TC Ltd Reasons :

1. Under a regulated fare, the industry must contain the cost of providing the service to a level that can be covered by the existing taxi fare level. (TC Ltd Submn page 35)
2. Notwithstanding the need to ensure taxis meet their universal service obligations outlined earlier, there remains scope for the industry to offer a higher standard of service for customers who choose,... (TC Ltd Submn page 35)
3. The nature of the premium service could include a form of guarantee for on-time pick-up or other features of service that customers might prefer and be willing to pay the additional cost for their provision. (TC Ltd Submn page 35)

Response :

- A. It seems extraordinary that the TC Ltd can propose a "special premium fee" for what it refers to as "on-time pick up" in Reason 3.
Most passengers and drivers assume that is a part of standard taxi service.
- B. It seems confusing that TC Ltd can propose better services, such as a "guarantee for on-time pick-up", given the 'near perfect' service and pick-up times claimed by TC Ltd through the KPI Key Performance Indicators elsewhere in the Inquiry Submissions and hearings.
- C. It is also confusing, given that the extra fee is presumably received by the driver, which does nothing for the revenue of the bookings / despatch Networks. Unless of course, the Networks were to claim a share of the fee for offering the booking to the driver ?

That would be unprecedented under the regulations, but is not mentioned.

- D. Curiously, the TC Ltd proposal has overtones of the practice to "siphon off only the most profitable customers" for which it criticises and proposes to ban trunk operations in the TC Ltd Recomm'n 6 Reasons.
- E. The TC Ltd proposal is vague and lacking in detail necessary to more fully assess its merit.
- F. The present TC Ltd proposal has a history. In 2007/8 TC Ltd proposed to IPART a \$21 premium fee (subsequently \$11) fee for special vehicles, namely limousines like Silver Service. The NSW TDA argued against this on the grounds that vehicles such as stationwagons and WATS were more truly 'special' in providing special facilities and service and thus more deserving of a special fee. The TC Ltd proposal was refused by the Minister.
- G. Taxi vehicles such as stationwagons and WATS etc, as well as limousines, are chosen competitively by operators and drivers to hopefully win extra work. Extra capital and fuel costs are borne solely by those operators and drivers. Cabs such as stationwagons are often given preference at the airport at customer request, but without any extra fee. They are also often requested through bookings, also without any special fee. WATS do not charge the customers special fees.
- H. The TC Ltd proposal could open the floodgates to a multitude of 'special service fees'. It could also give rise to various unregulated taxi fees. This should not be conceded lightly because the public has for many years understandably relied on the certainty and security of the meter fare system in NSW. A multitude of special fees are more likely to undermine that "confidence of the public in using taxis" (Recomm 3, TC Ltd T'SCRIPT page 5), and possibly also the TC Ltd importance of "universal service obligations" in Reason 2 above.
- I. It is noted that presently customers can always pay something extra if they wish.
- J. Finally, one must be aware of the TC Ltd control by Cabcharge which stands to gain from all increased fees.

TC Ltd Recommendation 8. *The government withdraw support for inclusion of taxi drivers in national occupational licensing.*

TC Ltd Reasons :

1. "Complaint statistics show that the ability of taxi drivers to provide good customer service is the most important factor influencing customer perceptions of service quality. It therefore follows that if networks are to be accountable for service quality then networks must be given the authority and responsibility for managing the training and assessment of taxi drivers." (TC Ltd Submn page 39)
2. "The Council of Australian Governments is undertaking steps to develop both national training standards and to issue national licences (taxi driver authorities) for taxi drivers. These initiatives will lessen the control of both the NSW Government and the taxi industry itself will have over training competencies and the standard of training delivery." (TC Ltd Submn page 39/40)
3. "National standards cannot take into account interstate variations in conditions and requirements, and national standards are utterly inadequate when it comes to taxi driver training." (TC Ltd Submn page 40)
4. "In previous cases the Taxi Council itself was the only party able to eradicate unscrupulous trainers from the industry." (TC Ltd Submn page 40)

Response :

- A. The TC Ltd reasons 1 and 2 above appear to be self serving arguments. The networks spend little day to day effort on driver quality of service to customers. It is not known if the

networks have ever been held accountable for such. In practice their "accountability" appears to be a slight argument.

- B. Taxi training in NSW is often criticised by more experienced taxi drivers and passengers. In part this is due to drivers not having been actively consulted in the formulation of the training programs. The TC Ltd training programs are far from perfect.
- C. As a taxi driver it is difficult to see why the training of taxi drivers should vary greatly from state to state apart from locality specifics. Let alone why "national standards are utterly inadequate when it comes to taxi driver training." It is understood from national training briefing meetings attended at T&I that some training 'modules', such as local street knowledge, will be specific to States.
- D. It is understood that the taxi entry level English test would remain a NSW departmental responsibility. It is the common view of taxi drivers and that of the passengers that the prerequisite English language skills should be at a higher level than at present in NSW.
- E. There are advantages in labour mobility. For example for an experienced NSW taxi driver to be able to readily take up a job in Victoria, etc., without extensive basic re-training.
- F. TC Ltd reasons 2 and 4 appear to point directly to the long standing lucrative monopoly and copyright that TC Ltd enjoys in NSW on their training materials. And which it is no doubt reluctant to relinquish. Under National training standards, the TC Ltd may perhaps be able to continue to "eradicate unscrupulous trainers" on the national behalf.

TC Ltd Recommendation 9. (Bailee drivers to be eligible for Traineeship support.) *The government amend the Traineeship ACT to incorporate bailee taxi drivers and make them eligible for traineeship support.*

TC Ltd Reasons :

1. "Entry level careers in many other industries are supported by the new apprenticeship and traineeship arrangements. Taxi drivers are specifically excluded from this system by the wording of the Traineeship Act for no justifiable reason." (TC Ltd Submn page 41)
2. "The absence of trainee support for people entering the taxi industry may be preventing some people choosing a career as a taxi driver over alternative careers in other customer service or hospitality industries." (TC Ltd Submn page 42)

Response :

- A. This proposal may be popular with some people considering taxi driving. Providing that it does not involve HECS type fees repayment requirements because of the high training costs and low taxi earnings subsequently.
- B. The TC Ltd basic training courses cost more than most 6 month TAFE courses.
- C. It is understood that the 6 weeks taxi school is not a traineeship and that the Taxi Care Plus training course is no longer an accredited training course.
- D. The TC Ltd proposal would mean the Government providing subsidies for basic taxi courses costing \$1200 or more to the commercial benefit of TC Ltd /Cabcharge.

TC Ltd Recommendation 10. (Review No Stopping and road rules etc for taxis.) *Planning Regulations and road rules be reviewed to ensure access for taxis is adequately considered along with other modes of public transport.*

TC Ltd Reasons :

1. "Major buildings that create a constant flow of people wanting to come and go by taxi are often surrounded by "no stopping" or other restricted zones." (TC Ltd Submn page 42)
2. "The limited availability of legal drop-off and pick-up locations means that taxi drivers risk either infuriating their passengers or attracting large penalties..." (TC Ltd Submn page 42)
3. "...the necessity of road rules that prohibit taxi drivers from stopping briefly to pick-up or set-down passengers in mail zones is a source of bafflement for the NSW Taxi Council." (TC Ltd Submn page 42)

Response :

- A. The thrust of this Recommendation for a review of regulations and road rules to ensure sensible access for taxis is supported. The statement is broad in scope, encompassing many taxi access issues, several of which have been referred to in other submissions and hearing statements to the Inquiry.
- B. The TC Ltd submission is supported in reviewing the planning approvals of new city buildings and the provision of taxi access - often necessitating alternatives to No Stopping signage.
- C. No Stopping is an impassable minefield for taxidriviers ! They are 'dead' if they do, 'dead' if they don't. The \$197 No Stopping fines are often a shift and a half of taxi earnings, ill affordable and totally unfair. But revenue hungry rangers prey on taxis. Not stopping risks drivers "infuriating their passengers" and directly contradicts the taxi regulations obliging drivers to comply with passenger instructions.
- D. The past No Parking and No Standing rules did not present any of these problems !
- E. The NSW TDA has had many meetings with the RTA and City Council and Blacktown Council concerning the notorious No Stopping problems. It is recognised that TC Ltd has also had No Stopping meetings with the authorities .
The RTA advised it will take 10 years to amend the Australian National No Stopping rules. The City Council trial and proposed spot by spot assessments to add a 1 or 2 minute taxi exemption is likely to take as many years. Not to mention all other areas of Sydney. There is no known easy solution.
A clear report by the RTA to the Inquiry may be helpful. That report may explain how special vehicles, garbage trucks, etc, appear to be exempted and how No Stopping zones appear to be able to be changed for clearways and Xmas ranks, etc.
- F. Perhaps the solution is for the Government to pass a NSW Amendment to the Australian No Stopping rules exempting taxis for 2 minutes for set downs and pick ups.
The RTA report may be able to comment on this solution.
- G. In addition a review of taxi access to western bus Transitways, similar to the important access taxis generally have to bus lanes, is supported as per Inquiry submissions and hearings.
- H. Similarly, taxi access to Bus stops for brief pickup and setdown only needs to be reviewed. Especially as passengers awaiting a bus often hail a taxi from the bus stop.
- I. And the issue of ranks, especially in the City also needs further review.
- J. Recommendation 10 is supported for urgent attention at many levels.

The Director
Select Committee on the NSW Taxi Industry
Parliament House
Macquarie St
Sydney NSW 2000
Fax: 02 9230 2981

1 March 2010

Dear Sirs,

RESPONSES TO 4 QUESTIONS ON NOTICE

Thank you for the four Questions on Notice from the Chairman of the Inquiry enclosed with your letter of 8 February 2010. The four Questions on Notice are listed with the Responses.

This letter forwards three sets of information :

1. The Responses to the four Questions on Notice. (5 pages)

The Responses are the opinions of and submitted by Ted Hirsch.

It is noted that the Responses are not page numbered.

(Please note that due to email technicalities, some of my Submission page numbers were displaced by one. This has affected the page references used in some Questions on Notice.)

2. The opportunity has been taken to add some information about the NSW Taxi Drivers Association further to some questions at the Inquiry Hearing. (1 page)
3. In addition an important letter to the members of the Inquiry concerning the recommendation for an independent "super body" Authority to investigate, plan and implement change and reform in the taxi industry is forwarded. (3 pages)

None of the above are confidential.

Trusting that these Responses will be of assistance to the Inquiry,

Yours Sincerely,

Ted Hirsch
Member NSW Taxi Drivers Association

RESPONSES TO QUESTIONS ON NOTICE - TED HIRSCH

QUESTION ON NOTICE :

1. Several submissions have suggested that taxi drivers often run the risk of breaching road and parking regulations when dropping off or picking up passengers. Do you have any particular concerns or observations about the occurrences of such breaches ?

Response :

This Question addresses a major problem of particular severity for taxi drivers. And a major problem for passengers, because the No Stopping regulations make it virtually impossible for taxis to legally drop off or pick up almost anywhere in the City and many other places and centres in Sydney. It is a problem that the Taxi Council and the RTA and the City Council and other Councils such as Blacktown are acutely aware of, but no one appears to have a solution.

With respect, my similar Response to a separate Inquiry question concerning the Taxi Council Recommendation No 10 has been repeated below as it mainly involves No Stopping, as well as reference to some related problems of taxi access.

At Response F below is a suggestion for what may be the only solution to this very major problem of No Stopping. That solution is for the Government to pass a NSW Amendment to the Australian No Stopping rules exempting taxis for 2 minutes for set downs and pick ups.

It is a solution prompted for the first time by the thought provoking nature of the Inquiry. It is also an approach which the Inquiry, with its parliamentary and legislative skills, is perhaps in a unique position to investigate and recommend.

(Response to TC LTD recommendation 10 :)

- A. The thrust of this Taxi Council Ltd Recommendation for a review of regulations and road rules to ensure sensible access for taxis is supported. The statement is broad in scope, encompassing many taxi access issues, several of which have been referred to in other submissions and hearing statements to the Inquiry.**
- B. The TC Ltd submission is supported in reviewing the planning approvals of new city buildings and the provision of taxi access - often necessitating alternatives to No Stopping signage.**
- C. No Stopping is an impassable minefield for taxidrivfers ! They are 'dead' if they do, 'dead' if they don't. The \$197 No Stopping fines are often a shift and a half of taxi earnings, ill affordable and totally unfair. But revenue hungry rangers prey on taxis. Not stopping risks drivers "infuriating their passengers" and directly contradicts the taxi regulations obliging drivers to comply with passenger instructions.**
- D. The past No Parking and No Standing rules did not present any of these problems !**
- E. The NSW TDA has had many meetings with the RTA and City Council and Blacktown Council concerning the notorious No Stopping problems. It is recognised that TC Ltd has also had No Stopping meetings with the authorities .**

The RTA advised it will take 10 years to amend the Australian National No Stopping rules. The City Council trial and proposed spot by spot assessments to add a 1 or 2 minute taxi exemption is likely to take as many years. Not to mention all other areas of Sydney. There is no known easy solution.

A clear report by the RTA to the Inquiry may be helpful. That report may explain how special vehicles, garbage trucks, etc, appear to be exempted and how No Stopping zones appear to be able to be changed for clearways and Xmas ranks, etc.

- F. Perhaps the solution is for the Government to pass a NSW Amendment to the Australian No Stopping rules exempting taxis for 2 minutes for set downs and pick ups.
The RTA report may be able to comment on this solution.
- G. In addition a review of taxi access to western bus Transitways, similar to the important access taxis generally have to bus lanes, is supported as per Inquiry submissions and hearings.
- H. Similarly, taxi access to Bus stops for brief pickup and setdown only needs to be reviewed. Especially as passengers awaiting a bus often hail a taxi from the bus stop.
- I. And the issue of ranks, especially in the City also needs further review.
- J. Recommendation 10 is supported for attention at many levels, especially No Stopping.

QUESTION ON NOTICE :

- 2. The Victorian Government recently established the Taxi Industry Safety Taskforce to develop initiatives to improve driver safety. Do you think such a Taskforce would be of benefit in NSW ?

Response :

- A. I am not familiar with the work, operation and success or otherwise of the Taxi Industry Safety Taskforce in Victoria.
- B. NSW about 4 years ago had the Taxi Advisory Committee (TAC) under the aegis of MoT, now Transport & Infrastructure (T&I), now no longer operative.
- C. The TAC considered many taxi industry matters, including inter alia, taxi safety issues such as safety screens, cameras and secure ranks etc. Those safety issues were dealt with relatively well and successfully.
- D. Generally however, the TAC did not have a strong performance record. Among other problems it suffered from too many participants and unbalanced representation. It was disbanded by MoT, now Transport and Infrastructure (T&I), after some 2 ½ years. ("Defunct cab body costing millions" Linton Besser SMH 21Sept09).
- E. A new body, focussed exclusively on the continuing critically important issues of taxi industry safety, including drivers and passengers safety, would be better and would be of benefit in NSW.

QUESTION ON NOTICE :

3. Your submission suggests that the pre-payment of late night fares would alleviate some of the problems faced by taxi drivers (p23). What would be the benefits of such an initiative ?

Response :

- A. The pre-payment of fares is strongly supported to minimise major loss of earnings and to minimise very serious safety incidents.**
- B. Pre-payment of fares should be applicable at all times of day and night because the problem of 'runners' is not restricted to late nights. For example, it is more common in certain areas of Sydney, day or night. It should not be restricted to late night fares.**
- C. Being applicable at all times normalises the pre-payment of fares, rather than being a special issue. This is desirable so that passengers become used to pre-payment. Just as pre-payment of fares on buses and trains is normal and expected. Sometimes the taxi driver may choose to not request pre-payment. But that is a judgement of the taxi driver and decision which should be left to the driver.**
- D. The benefits of pre-payment of fares are two fold. Firstly that it minimises the obvious loss of earnings. On occasions such losses can be major, resulting in a wasted 12 hours shift of taxi driving. A \$100 dollars out of a day's earnings can be very major for many drivers. And their families.**
- E. Secondly however, a fatigued and stressed taxidriver under such circumstances may lose his temper and chase the runner in his taxi. That has dreadful and most serious potentials for physical danger. The physical dangers of an accident between the taxi and the runner or the dangers of a cornered runner turning violently onto the taxidriver. Both scenarios are too horrible to contemplate, but they are real. And runners are unfortunately a common every day problem. Pre-payment of fares largely prevents these very serious consequences.**
- F. It is noted that the existing Regulation permitting taxidrivers to request "capacity to pay" is absolutely useless because it provides no guarantee of actual payment at the end of the trip. And hence no protection against the dire possible consequences of non-payment.**
- G. It is considered that the vast majority of drivers would fully support pre-payment of fares for the reasons above.**
- H. Pre-payment of fares is understood to be a simple matter to introduce by taxi Regulation.**
- I. Further to this Question on Notice, I have reviewed my submission, No 54 Sect 2.05, p24/25/26 and comments to the Inquiry hearings at Transcript Thursday p14, para 5 and stand by them in relation to pre-payment of fares.**

QUESTION ON NOTICE :

4. Your submission suggests that the 5 existing radio bookings networks should be merged into a single Sydney wide network (p18) ? What do you believe would be the benefits of a single booking network ? Would the booking network also manage WAT bookings ?

Response :

- A. **The primary reasons for suggesting a single Sydney wide bookings /despatch network is because the benefits would be immense for the taxi service to passengers. The fundamental advantage being able to despatch any of the 5500 Sydney taxis. Currently, when a passenger rings for a booking only the limited numbers of taxis belonging to that particular network are available. And only those taxis of that network that happen to be in the area of the passenger are available.**
- B. **With a single network all the 5500 taxis of Sydney are available to the passenger ! Limited only by the taxis of those 5500 that are in the area of the passenger. That is a vast increase in the number of taxis available for any Sydney booking ! With huge improvements in both the availabilities and response times of booking services to the public.**
- C. **There are many interesting and important examples of how the availability of all 5500 Sydney taxis improve the bookings service. EG a passenger booking a taxi in the Shire may be faced with an endless wait when the few, 250 or so, St George cabs are busy. Nor sometimes do busy St George cabs want to take a booking out of the Shire, say into the City. But any of the other 5500 Sydney taxis that happen to be in the Shire can thus service that Shire booking under a single booking network.**
- D. **Similarly loyal northern beaches passengers are often disappointed because of the few 300 approx Manly cabs. Again, any of the other 5500 Sydney taxis that happen to be in the Northern Beaches can, and would be pleased, to service those bookings. Similarly, also with the 1500 Premier taxis, or the 61(?) Lime taxis, for the passengers in all areas of Sydney at busy weekday peak times. And also on busy Friday and Saturday nights when large numbers of Sydney taxis (from 5 different networks) work around the city areas.**
- E. **Major advantages accrue to the taxi drivers who suddenly are offered jobs Sydney wide, rather than primarily in their main areas. Thus a St George taxi in the Northern Beaches would love to take a job to the City, let alone to the Shire, while the Manly cabs may be reluctant to leave their area. And increased bookings Sydney wide means increases to meagre taxidriver earnings, which in turn will greatly enthrall drivers !**
- F. **The second reason for the suggestion of a single Sydney wide network is commercial. The 5 taxi radio booking Networks of Sydney are dying a slow death. But 'constrained' revenues and rising costs of labour and technology are forcing the radio bookings /despatch networks into ever decreasing customer services to reduce costs and survive. This cannot continue ; the radio bookings/despatch networks have to either vastly increase their fees or die. Or necessarily reform and evolve again (Submission**

54 Sect 2.04 top p19) ; perhaps this time into a single commercially viable bookings service !

- G. Indicative perhaps, is that during the Inquiry, it is understood that the Premier and Legion bookings /despatch networks had been conducting discussions concerning amalgamating their services. Such discussions were terminated.
- H. Commercially, the 5 radio bookings/despatch networks could also shed their costly non- revenue regulatory obligations in relation to Safety, lost property, complaints, etc. But all 12 networks including the 5 radio bookings/despatch networks could continue with their commercially profitable operations such as leasing plates, decal sales, insurances, etc., as well as maintain their own distinctive livery to continue to attract loyal customers (if in fact to the single network).
- I. The WATS Zero 200 network is understood to work reasonably well, especially because it is a dedicated network service, separate from other taxi network bookings systems. It would seem sensible therefore to continue something that works, and to keep it as a dedicated WATS service.
As to “Would the [single] booking network also manage WAT bookings ?”, that would seem reasonable provided it was operated separately as a dedicated service.
- J. In addition to the above responses, it has become apparent that the question of a single Sydney wide radio bookings /despatch network raises issues well beyond the major customer service and commercial advantages above and the question of a WATS service.
It begs fundamental commercial, management and operational issues entailing the resolution of major and no doubt difficult matters across a large spectrum of opinions and interests.
- K. Accordingly, during the Inquiry, it has become clear that the question of a single Sydney wide radio bookings /despatch network is another of the major taxi industry developments can be best handled, and perhaps only implemented, by an independent taxi industry Authority. An independent Authority with the power to implement the necessary major changes and reforms as recommended per Submission 54 Sect 2.03.

ADDITIONAL INFORMATION - NSW TDA :

It is requested that the Inquiry permits this opportunity to add some information about the NSW Taxi Drivers Association further to some questions at the Inquiry Hearing. (Transcript Thursday 4Feb2010 p12, 13.)

The NSW TDA is highly representative of NSW taxi drivers, incorporating bailee drivers, lessee drivers and owner drivers in its Constitution and Committee structure and membership as explained to the Inquiry.

It is similarly highly representative and consultative in its practices, attempting each year :

- to hold 2 or 3 General Meetings plus an Annual General Meeting with its members as well as non members to discuss important taxi and Association issues,
- To print and distribute every 2 to 3 months 4000 copies of its 8 page "Squeaky Wheel" newsletter to inform almost a quarter of Sydney taxidriviers,
- And conducting an open taxi discussion site on the web for all taxi drivers called NSWTDAFORUM.

The membership numbers of the NSW TDA are precisely audited each year by its professional auditor under the requirements of its NSW TDA Incorporated status.

The NSW TDA with good reasons claims to be the most truly representative taxi driver body and to have many more taxi driver members than any other NSW organisation.