

INQUIRY INTO OPERATION OF THE POINT TO POINT TRANSPORT (TAXIS AND HIRE VEHICLES) ACT 2016

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I would like to take this opportunity to draw your attention to recommendations in the attached submission regarding the implementation of advanced technology in communications and removing the industry “barrier to entry” and superfluous expense to Transport for NSW represented by the operation of 0200 WAT Dispatch Network.

Submission to the NSW Ministerial Inquiry
into the Taxi Industry from

UniCab Australia Pty Ltd

The one cab for everyone



June 2004

From

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Who we are

UniCab Australia is a new taxi company free from commitments to older vehicles or outdated network technology. It will establish itself in Sydney as a fully accredited network with a fleet of cabs designed for people of all degrees of mobility.

UniCab Australia's fleet will equate to 6 percent of Sydney's cabs and 55 percent of its wheelchair cabs.



Summary of recommendations

NSW's taxi industry must underpin the wider public transport system with a service that delivers quality and equality for everyone on demand.

UniCab Australia's recommendations deliver these outcomes. They are:

Recommendation 1

Introduce universal-design taxis capable of serving able-bodied and disabled passengers alike. This would:

- Maximise the number of taxis able to transport wheelchair users and other mobility-impaired people,
- Meet the aspirations of the disabled, who seek equality of opportunity to travel, and
- Save the need to raise the leasing cost of WAT plates to fund performance bonuses that are designed to improve service.

Recommendation 2

Normalise the booking of wheelchair accessible taxis by:

- Abandoning the 0200 booking service, which increases the costs of

- wheelchair-accessible taxis and acts as a barrier to entry, and
- Preventing networks from declining requests made by users of accessible taxis.

Recommendation 3

Embrace advances in computers, global positioning and vehicle design to create fleets of roaming people-movers to pick up passengers “on the fly” with continuous, discounted multihiring including enroute.

This would improve customer service by lifting the efficiencies and effectiveness of Sydney’s taxi fleet.

Recommendation 4

Broaden the role of taxis and their networks to:

- Help meet the rocketing demand for community transport,
- Create more cost-efficient ways to transport the disadvantaged and the disabled,
- Augment the emergency services with non-critical transport and location training,
- Create a career path for drivers that increases the range and flexibility of their skills.

Recommendation 5

- Lower the cost and time of training to increase the number of potential drivers and overcome the artificial shortage,
- Include wheelchair endorsement in the standard course for taxi drivers, and
- Publicise to potential applicants the Department of Transport’s 100 percent reimbursement of the cost of wheelchair endorsement.

Recommendation 6

Rigorously adhere to safety standards by:

- Insisting on the crash testing of wheelchair-accessible cabs to full-volume compliance standards, and
- Adopting designs for wheelchair-accessible taxis that minimise the current danger to disabled passengers.

Submissions in detail

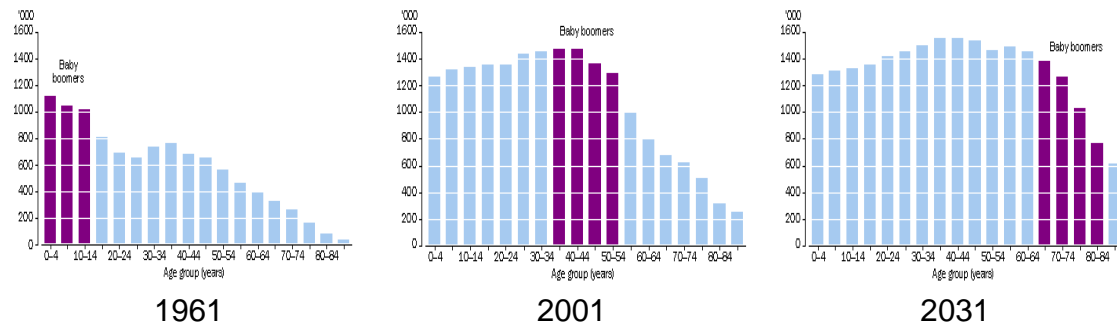
1 – Maximum effectiveness

Today's fastest growing section of the population is the aged. The number of over 65s is expected to grow four to five times faster than the wider community in the next 25 years until they make up a quarter of Australia's population. That's more than double their current 12 percent.

And with ageing comes a natural increase in mobility impairment.

At the same time, countries in the OECD, the WTO, and the UN are recognising the value of anti-discrimination and pro-seniors policies. England and Ireland have already legislated to provide universal-design taxi cabs to ensure an equal service for everyone. In Australia, the Human Rights and Equal Opportunity Commission and the Physical Disability Council of NSW have recommended similar laws.

AUSTRALIA'S AGEING POPULATION



As the Physical Disability Council told the Parry inquiry, disabled people, particularly wheelchair users without private cars, are disproportionately reliant on public transport. Research presented to the 1999 European Conference of Transport Ministers shows the disabled use taxis up to 20 times as often as the general community.

Yet in NSW service delays of 45 minutes to an hour are commonplace, with delays rising to 2 to 4 hours outside the inner city and the airport corridor.

Many of the taxi industry's systemic practices are discriminatory against the disabled, who have fewer transport options than most people. Even though AusStats figures show that almost 20 percent of people in NSW are disabled:

- Most train stations are not wheelchair accessible;
- More than 60% of state buses are not accessible;
- More than 75% of private buses are not accessible; and
- As many as 94% of taxis are not accessible.

This Parry inquiry's interim report made the size of the problem clear when it said the current service for people in wheelchairs was not acceptable.

Examples that illustrate this have come to light through the MS Society and the Physical Disability Council include:

- A wheelchair user who was 1 hour late for therapy despite booking the taxi 2 weeks in advance was told no taxis were available.
- Another wheelchair user had a wheelchair-accessible taxi arrive 1 hour late for a booking to travel between Mascot and the CBD. As a consequence of the delay, the wheelchair user arrived late to view an apartment for rent, which was taken by another person. Given the scarcity of wheelchair-accessible accommodation, he felt doubly penalised by the service failure and discrimination of the current set-up for wheelchair-accessible taxis.
- A third wheelchair user told how he waited 45 minutes outside the Queen Victoria Building in Sydney for a wheelchair taxi booked through the 0200 service. While he waited for the booking to be fulfilled, three different, vacant wheelchair taxis displaying illuminated "For Hire" signs, drove past the wheelchair user.

The disabled seek equality of transport. Many of Sydney's wheelchair-accessible taxis make the disabled feel as though they are on show. As well, they are so specialised that the general public avoids them. That in turn makes their economics less attractive to operators, which keeps their numbers down and increases the waiting times of passengers.

Maxi-taxis are a case in point. Operators receive substantial incentives to provide transport for the disabled. However, they exploit a loophole to ignore the disabled and maximise profits by aggressively marketing maxi-taxis for group bookings. When officially prebooked, maxi-taxis and other accessible taxis are not available to the disabled.

The Physical Disability Council believes that raising the cost of wheelchair-accessible taxi plates to fund a performance incentive would help correct the lack of a reliable taxi service for wheelchair users. This is commendable but would cause inefficiencies and be open to rorting.

Instead, it is better to have many more wheelchair-accessible taxis that also appeal to the general public. It is more efficient to offer concessions than to raise barriers to entry. Such concessions could include:

- Updated regulations to allow for modern, cheaper communications technologies such as GPRS rather than the old licensed two-way radio frequencies,
- Elimination of the 0200 booking service and the extra fees forced on operators of accessible taxis.
- Cheaper wheelchair-accessible taxi plates to encourage owner-drivers, and
- Capping the leasing cost of WAT plates at \$1000 a year in perpetuity.

UniCab Australia believes that if all taxis are wheelchair accessible, there are no disincentives to operating such vehicles. Thus a universal-design taxi capable of carrying two wheelchairs or six able-bodied passengers would cut the intolerably long waits suffered by the disabled.

A universal-design taxi is the most equitable and non-discriminatory option open to the transport industry. It is for this reason it is being taken up by OECD member nations and being advocated by the Human Rights and Equal Opportunity Commission and many peak disability groups in Australia.

As the Physical Disability Council has submitted to various inquiries, there is no evidence that shows wheelchair accessible taxis (once purchased) are more expensive to operate than taxis that fail to meet the needs of the whole community.

In fact, they can be more efficient and generate extra income.

A NSW Department of Transport survey of wheelchair accessible taxi users showed that, on average, journeys by wheelchair users covered a greater distance and travelled with the meter running for longer periods than passengers who do not require a wheelchair-accessible taxi. Thus wheelchair users generate more income per person for taxi operators than passengers who do not use wheelchairs.

As well, wheelchair accessible vehicles (with the exception of metro cabs) carry more passengers than inaccessible vehicles. This is more cost-effective for small group travel and opens up previously untapped sectors of the diverse range of passenger types in the market.

Entrenched industry interests argue there is an oversupply of inaccessible taxis outside peak times and wet weather. The irony is that a universal taxi serving all customers would be part of the solution rather than the problem. Critical to this is having enough universal cabs to generate economies of scale and reduce the cost of specialised vehicles.

Converting the entire fleet need only be introduced over a reasonable timeframe. Members of the OECD that have adopted universal taxis have settled on two generations of taxis as the most economically feasible timeframe. In NSW, this would be 12 years.

To complement this, the booking of wheelchair accessible taxis should be normalised. A wheelchair user making a taxi booking by phone, waiting at a taxi rank or hailing a cab from a street corner should not be required to wait longer than other people.

NSW Department of Transport figures show the state's dedicated booking service is not operating effectively. It does not provide the same level of service for wheelchair users as is available to the general public and recent advances in technology make it superfluous.

Taxi networks needlessly inconvenience callers requiring accessible taxis. Callers wanting an accessible taxi who dial the general number are curtly told this is the incorrect number and to call the 0200 line - often without even being told the correct number. When they redial, they are often connected to the same operator or one sitting next to that original operator. This would not happen if someone rang to book a maxi-taxi for a group of people instead of a wheelchair.

For these reasons, only 1 in 5 of all wheelchair accessible taxi trips are arranged through the official 0200 booking line. As many as 80 percent are made through private arrangements.

To compound the problems, the cost of installing and subscribing to an additional communications network significantly increases the overheads of wheelchair accessible operators and unnecessarily complicates their operations. This acts as a barrier to entry for new operators.

Recommendation 1

Introduce universal-design cabs capable of serving able-bodied and disabled passengers alike. This would:

- Maximise the number of taxis able to transport wheelchair users and other mobility-impaired people as well as the general public,
- Meet the aspirations of the disabled, who seek equality of opportunity to travel, and
- Save the need to raise the leasing cost of WAT plates to fund performance bonuses.

Recommendation 2

Normalise the booking of wheelchair accessible taxis by:

- Abandoning the 0200 booking service, which increases the costs of wheelchair-accessible taxis and acts as a barrier to entry, and
- Preventing networks from declining requests made by users of accessible taxis.

2 – Improve customer service

UniCab Australia supports the introduction of a new form of continuous, discount multihire of taxis. This would use modern technology to go way beyond the limited form of multiple hiring that has been used for many years.

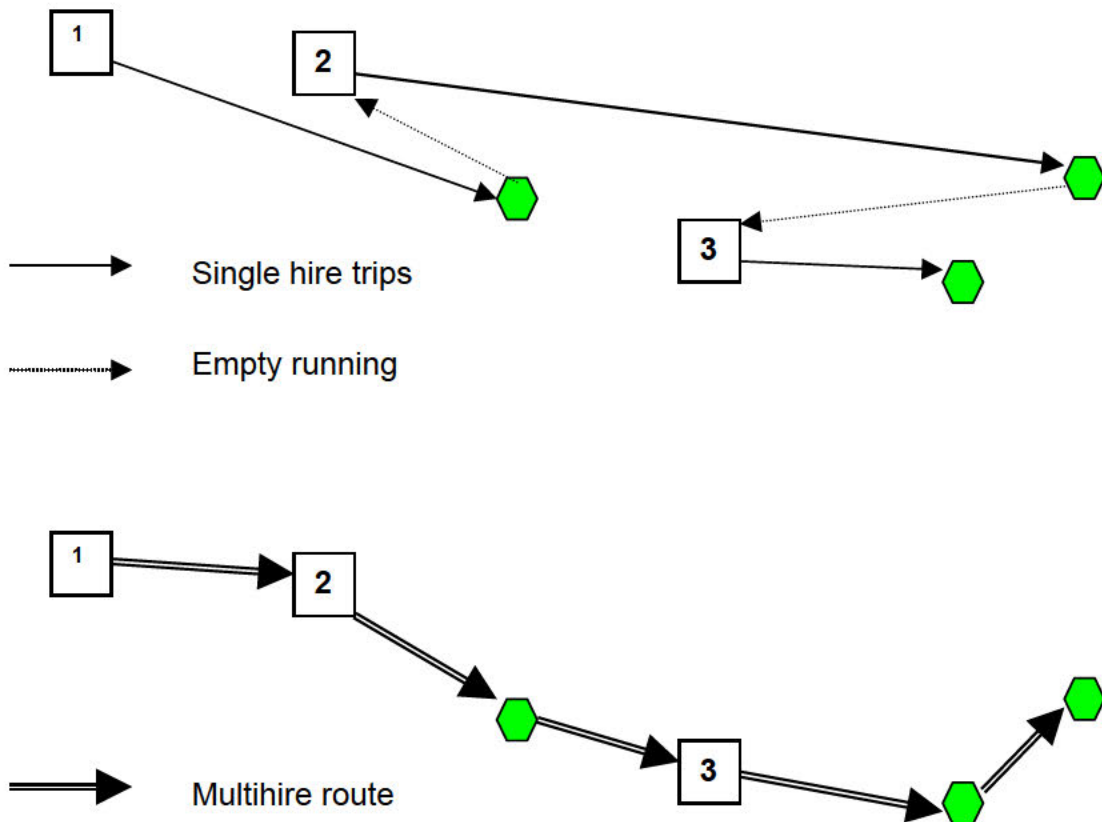
It would use global positioning satellites and advanced booking systems to deliver:

- An anywhere-to-anywhere anytime service,
- Increased efficiencies and effectiveness of the taxi fleet,
- Transparent fares that are at least 25 percent cheaper than current taxi rates for those passengers who chose this option,

- Guaranteed pick-up times,
- Guaranteed delivery times,
- Guaranteed deviations, and
- Continuous monitoring of vehicles, which roam continuously with no fixed route.

It could easily be extended to multihire enroute, which would increase efficiencies even further.

EFFICIENCY GAINS FROM CONTINUOUS MULTIHIRING



Taxi schemes such as Multiride and The Max in Brisbane are the forerunners of this concept.

The keys to public acceptance are affordable, transparent fares, the provision of expected arrival times, automatic callback ahead of pick-up, and maximum deviations.

Almost all the requirements for continuous, discounted multihiring – the technology as well as suitable vehicles – are now in place. The computers, communications equipment, mobile data terminals, and GPS systems are already installed in taxi systems.

All that's missing is legislation to allow multiple hire enroute rather than from the point of departure and to expand the use of destination signs.

The key markets for continuous, discounted multihire would include:

- Children being picked up and dropped off at school,
- Teenagers and young adults making cross-suburb trips, and
- Workers for whom public transport is inconvenient.

Recommendation 3

Embrace advances in computers, global positioning and vehicle design to create fleets of roaming people-movers to pick up passengers "on the fly" with continuous, discounted multihiring including enroute.

This would improve customer service by improving the efficiencies and effectiveness of Sydney's taxi fleet.

3 – Broader role

The demand for community transport is rocketing. The cost of home and community care is up 50 percent in three years to \$21.6 million and non-emergency health-related transport now costs \$26 million a year.

In all, 130 organisations across the state are paid about \$50 million to take the frail aged, the disabled and the disadvantaged to social services, health care, shopping, education, recreation, and social contact.

These organisations report that they can't keep pace with the demand. NSW Health finds the lack of transport to health services is one of the most significant health concerns of the community and a barrier to providing effective health care.

On top of this, the Taxi Transport Subsidy Scheme, which helps people with a permanent disability, had \$14.4 million allocated to it this year. In all \$825 million is spent yearly to help people across NSW with their transport needs.

UniCab Australia believes a combination of universal-design taxis and continuous, discount multihire enroute is the basis of a sustainable, cost-effective solution to this problem. A fleet of taxis capable of carrying two wheelchairs or six able-bodied passengers whose locations are tracked continuously by GPS and dispatched with advanced communications technology would cut the government's current taxi bill and also take some of the strain off community groups.

Taxis in such a fleet could be called on as needed by:

- The disabled community,
- Aged-care homes and villages,
- Hospitals, and
- Schools.

UniCab Australia also believes an integrated solution could go further. Taxi communications could be linked to the emergency services so that taxis could supplement patient transfers from hospitals and provide non-emergency evacuations in large-scale crises.

The company sees advantages in the proposal for taxi networks to employ drivers. A career path can be created for drivers where they learn complementary skills and earn educational credits in areas such as paramedicine, tourism and hospitality.

Drivers could be trained to deliver an expanded range of services to meet passengers' needs.

The number of drivers endorsed to drive wheelchair accessible taxis could be maximised in a two-fold approach:

1. Adopt online methods to cut the cost and time of training, which would maximise the total pool of available drivers, and
2. Include wheelchair endorsement in the standard course.

Existing drivers should also be required in a reasonable timeframe to complete wheelchair endorsement.

To complement these changes, the Department of Transport's existing 100 percent reimbursement of the cost of wheelchair endorsement should be publicised to potential applicants rather being limited to graduate drivers.

Recommendation 4

Broaden the role of taxis and their networks to:

- Help meet the rocketing demand for community transport,
- Create more cost-efficient ways to transport the disadvantaged and the disabled,
- Augment the emergency services with non-critical transport and location training,
- Create a career path for drivers that increases the range and flexibility of their skills.

Recommendation 5

- Lower the cost and time of training to increase the number of potential drivers and overcome the artificial shortage,
- Include wheelchair endorsement in the standard course for taxi drivers, and
- Publicise to potential applicants the Department of Transport's 100 percent reimbursement of the cost of wheelchair endorsement.

4 – Stay safe

The only manufacturers of wheelchair-accessible taxis in Australia are low-

volume compliance manufacturers (less than 25 vehicles a year), who are not required to crash test their vehicles. Their "cut and shut" conversions greatly alter the original specifications of weight dispersal and loading.

However, these manufacturers claim this has no effect on the ride or safety of the vehicle and so does not require crash testing. UniCab vehicle safety engineers strongly disagree on this.

From January 1, Australia adopts the European standard for crash-testing wheelchair-accessible taxis. To meet this standard and protect the passengers, all models of wheelchair-accessible cabs should be crash-tested to full-volume compliance standard.

Estimated Number of Wheelchair Users Injured or Killed by Injury Producing Activity, 1991-1995*

Injury Producing Activity	Estimated No. Of Persons	% Total
Improper or No Securement	2,494	35%
Collision Between Wheelchair and Motor Vehicle	1,819	26%
Lift Malfunction	1,366	19%
Transferring To or From a Motor Vehicle	1,035	15%
Falling On/Off Ramp	407	6%
Total	7,121	100%

* Percentages may not add to 100% due to rounding.

The design of many wheelchair-accessible taxis also leaves many passengers at risk when boarding and alighting. Figures from the US Department of Transport's National Highway Traffic Safety Administration show that thousands of wheelchair-bound passengers were injured from 1991 to 1995 in mishaps involving their taxis. Twelve died.

More than 1000 were hurt transferring to or from a vehicle, almost 2000 were hurt in collisions between the wheelchair and a vehicle, 2500 were hurt because of improper or no securement, 1300 were hurt in

taxi-lift malfunctions, and 400 were hurt falling from the on-off ramp.

UniCab Australia notes that cabs with rear entry can be the most dangerous. This is because wheelchair users are often forced to negotiate entry to the taxi from the roadway.

Most wheelchair accessible taxis, which have the driver at one end and the wheelchair-bound passenger at the other, also suffer from lack of communication. Many of these passengers have a reduced ability to project their voices and simply can't tell the driver if something is wrong.

In addition, this set-up necessitates the passenger sitting near or over the back axle, which magnifies bumps in the road and increases the discomfort of the ride.

Recommendation 6

Rigorously adhere to safety standards by:

- Insisting on the crash testing of wheelchair-accessible cabs to full-volume compliance standards (including side and rear impact tests), and
- Adopting designs for wheelchair-accessible taxis that minimise the current danger to disabled passengers.

5 – Conclusion

Taxis that are little more than four-door sedans with a radio and decals are no longer appropriate to the needs of a modern, integrated, public transport system. They also discriminate against 20 percent of the population.

UniCab Australia believes the current fleet of taxis should be replaced in two generations by universal-design taxis and the 0200 network should be scrapped.

As well, continuous, discount, enroute multihire should be adopted to supplement single-hire taxis to deliver transparent fares that are at least 25 percent cheaper than current taxi rates for those passengers who chose this option.

The role of taxis should be broadened to supplement hospital transfers and even emergency services. As well, career paths for drivers can be created that increase the range and flexibility of their skills.

And above all, crash testing and safe designs are of paramount importance for passengers of the taxi industry.

In a nutshell, a taxi industry that underpins the wider public transport system must deliver quality and equality for everyone and maintain the dignity of the user.

Adopting UniCab Australia's recommendations would deliver this.