

Supplementary  
Submission  
No 87a

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

**Organisation:** Milton Ulladulla Taxis, Limousines and Charter Bus Service

**Date Received:** 29 May 2020

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## **SUBMISSION TO PORTFOLIO COMMISSION No.6-TRANSPORT & CUSTOMER SERVICE**

From: Brian Wilkins

Milton Ulladulla Taxis, Limousines & Charter Service,

Dear Committee members,

Firstly, I'd like to thank you for the opportunity to respond to this long-awaited review of the Point to Point Transport Commission regulations & operations.

Milton Ulladulla Taxis, Limousines & Charter Bus Service is a family business, we've operated since 1996 and our family consists of three generations of driver/taxi operators who've continuously operated taxis in NSW since 1946.

The Milton-Ulladulla district is located in the lower Shoalhaven on the south coast of NSW with a population of approx. 15,000 residents. Our area of operations stretches from Bendalong/Manyana in the north to East Lynne/North Durras in the south. Like most coastal towns, our district is a tourist destination, so in holiday periods our population can treble.

Our fleet consists of 6 taxis, 2 which are WATS (wheelchair) vehicles, 2 limousines, 2 booked car vehicles and a 29-seater charter bus, we operate seven days a week from 5.30am -2.00am Monday to Thursday, 24hrs on Fridays, Saturdays & Sundays till 2.00am Monday morning. I operate this business in conjunction with my son, Scott, we've been contracted to Department of Veterans' Affairs, South East Sydney & Illawarra Area Health Service & Department of Education since taking over this business in 1996.

The creation of this extra level of bureaucracy now brings the number of departments the taxi industry has to deal with to three, Transport for NSW, Roads & Maritime Services and the Point to Point Commission (P2P Commission), all with varying controls & service commitments to the taxi industry.

The position of inaugural Point to Point Commissioner was given to an active participant of the Sturgess Report and thoroughly entrenched in 'Sturgess philosophy'. It's hard to find any complimentary words in relation to the performance of Ms. Barbara Wise even though as an industry we strived to be conciliatory with the P2P Commission. The Sturgess Report made 57 recommendations, 56 of these were adopted by the Baird government, Prof. Sturgess claimed these changes would reduce 'red tape', thereby saving millions of dollars in costs. What he didn't say was that the only beneficiaries of these changes were the NSW government, cost was not reduced, it was merely transferred to the taxi industry. On a positive note, it is however pleasing to note that the current commissioner, Mr Anthony Wing, appears to have a much better understanding of our industry's problems.

In my opinion, to remove compulsory taxi driver training, uniforms, age limits on vehicles, regular inspections on vehicles (Sydney Metro was 4 monthly whilst Country Taxis had 6 monthly) and operator accreditation was a retrograde step. The removal of these important criteria, previously regulated by Roads & Maritime Services & Transport NSW, was an impediment to our industry and now the burden of implementation has been shifted so that now responsibility and cost lies with both network & operator.

To meet the requirements of Point to Point Commission we've had to outsource our communications by joining a bureau call centre, as the commission regulated the requirement for real-time data on all bookings & trip journeys. The cost for a small operator to adopt this technology is \$40,000 per annum, the technology is limited and the efficiency of the service is nowhere near the service levels we previously delivered when operating manually and these cost increases have significantly reduced my profitability.

The imposition of workplace health & safety requirements on networks & small operators, similar to that required of multinational companies and the paperwork & recording to comply, has further increased our operating costs.

The Point to Point Commission has so far, been intent on audits & inspections of taxi operators but there has been very limited road enforcement to ensure other rideshare operators are working legitimately (which they aren't). Although it must be noted that now Point to Point Commission has begun working with the taxi industry to identify taxi ranks where rideshare is illegally operating, this policing will begin shortly.

To comply with network/operator compliance the on-boarding of a single driver now takes one full day of our time and like most small networks who constantly struggles to find taxi drivers I can't afford to stall a prospective driver until I have enough people to run a class. We spend the best part of a day working through all the topics that constitute the driver induction training program to conform with P2P regulations. Our workload also increased with the onus on the operator/network to collect PSL without any compensation for the time involved in collecting it. At the time of PSL implementation State Revenue concluded that it would cost approx. 50 cents in the dollar for it to collect PSL but the P2P ignored that advice & imposed the responsibility onto our industry with total disregard of the added workload, we feel that an equitable arrangement needs be negotiated, we're in favour of continuing with PSL because this will fund the buyback.

There appears to be no transparency as to the supervision of rideshare operators, at present they enter the industry unfettered and while this continues the taxi industry will battle to exist. Where in the public domain is there information about the number of rideshare operators plying trade? Surely Uber, Ola et al know because they have to pay money into the accounts of these operators once they take their cut, all bookings are done on an app, customers have to register their credit card details, drivers accept bookings online and will obviously have their accounts credited for bookings completed otherwise they won't turn up to work so why doesn't the Point to Point Commission know or more importantly why don't they make this information public? Everyone can access the number of taxis operating in NSW, of which over 3300 plates have presently been handed back in, many of these taxi plates won't need to be reissued because there is no demand for them, they are in fact worthless, yet previously NSW government regulated and even sold these same taxi licences, the government sold them for over \$400,000 pre-restructure.

Country and regional taxis meet trains and coaches 24/7 at transport hubs, we carry wheelchair passengers to & from business, social and medical appointments, we assist our elderly clientele with their shopping and personal transport requirements- in reality we assist many of them so that they're able to maintain their independence. The only government department, either state or federal, that has shown any loyalty to the taxi industry is Department of Veterans' Affairs, we transport veterans and war widows to/from medical appointments all over NSW, the taxi industry has an exemplary record with veterans' transport and are the department's preferred transport providers.

It is my opinion as a 62-year participant in the NSW taxi industry that unless there is a complete review of the point to point industry and a rationalisation of the number of vehicles plying trade, regional NSW will have considerable collateral damage in the current climate. Why? Because the allegedly lifting of 'red tape' and relaxed entry for new operators have created a toxic environment. Maybe you should try the pub test? Many older Australians with 'no skin in the game' feel that the taxi industry was badly treated by the government as taxi plates trade at less than 25% of their previous value, taxi plate owners who were previously self-funded retirees have now been forced to apply for old-age pensions, many experienced operators are who should have been retired by now are older, only waiting in the hope that the NSW government will do the 'right thing' and offer them a respectable compensation package, similar to that afforded the hire car industry. Rideshare aren't interested in taking an old lady three blocks for a \$10.00 fare, helping carry her groceries into the house.

Governments, both state & federal, heavily subsidise community transport and the cost of on-demand transport is outrageous compared to the cost that taxis would charge.

The government should look at work currently farmed to community transport and also the retention of Taxi Transport Subsidy Scheme program to taxis only if they are serious about assisting our industry to survive in regional areas. In some areas it may be necessary for the government to subsidise the operation of a taxi service, similar to that afforded to the bus industry, the government pays an hourly rate to the operator and the government collects the value of the fares.

Whilst there are many very elderly operators still operating in regional NSW, I'm sure that if these people were fairly compensated for their licences, many second & third generation participants would be ready to take over the operation of the family business- provided the annual leasing fees & operational costs were commensurate to the area of operations.

The regional taxi industry is eager to ensure country NSW will always have taxis available and unlike our competitors, we certainly didn't disappear during the COVID19 crisis. In the current climate, which is a free for all, of unfettered entrance for rideshare operators looking for a quick buck, we should not be expected to meet the 6.30am bus when there is no one else available for such work because it is not profitable- our drivers are working for peanuts-they haven't had a fare increase since 2014- how many adults work for 10 hours and gross less than \$150.00 GST incl. per shift?

Our industry needs support, it needs an overhaul of government 'reforms' that has seen plate values & driver/operator earnings plummet, most taxi industry participants have lost faith in the NSW government, yet we appreciate the invitation to participate in this review.

Thank you for this opportunity,

Kind regards,

Brian Wilkins

TEAMCARD PTY LTD

T/A

Milton Ulladulla Taxis, Limousines & Charter Bus Service

Booking Service Provider, No:400540

Taxi Service Provider, No:400593