

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Taxi Regulation Review - Submission Friday,  
**Date:** 16 November 2018 2:55:06 PM

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Dear Mr Swain, Commission for Transport

I write in response to the letter(s) I recently received regarding the Taxi and Hire Vehicle Industries Regulation Review. I own/manage a five perpetual taxi plates on behalf of my family company Jade Holdings.

Following a review of your paper and consultation with colleagues in the industry, I am in support of Option 2. Our family company has invested significant funds into these taxi plates, at sums far exceeding current market values. Option 2 will give us a transition period during which some of the financial investment we've made in the industry can be recouped. I am also very concerned for plate owners who are more recent entrants to the market and who face a very severe financial loss. Option 2 goes further in helping them with a stronger degree of financial certainty. I oppose Option 1, which I sense will impact result in a more severe impact to the industry and our investments in it.

On other points in the Review, I am very much in favour of the attempt to level the playing field between taxis and ride-sharing operations, and support the overall direction of the Review. I am in favour of strong controls regarding passenger safety for all passenger services - driver and vehicle checks in particular. I am also in favour of allowing taxis to negotiate prices on booked fares. Competition against unregulated ride-sharing fares has been impossible up to now, given the regulation of taxi fares.

Thank you for the opportunity to provide feedback on the Review.

Yours faithfully,

Alastair Ingham

Director

Jade Holdings  
[REDACTED]

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Email sent using Optus Webmail

From: [REDACTED]  
To: [Taxi Review \(StateGrowth\)](#)  
Subject: Taxi Submission  
Date: Saturday, 24 November 2018 6:04:00 PM

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Dear Sir/Madam

- Option 1 .

Deregulation is not a proven method as it has not worked in different parts of the world .

1. Standards have come down because of deregulation. Every other person buys a cheap car ,has no knowledge and expertise about providing transport service will move in and out of the industry .

2. Because of the ease of getting into the industry with minimal investment and stake and with more & more cabs on the road and less & less money to make , operators will do all the dodgy they can to save money . One way is to save on maintenance and increasing the risk for passenger and public .

3. It would be a stab in the back for the people who have invested in their licences trusting the government .Having their licences as their superannuation and retirement savings .

4. It is not like a coffee shop business .It is very absurd to compare like this .A coffee business after operating for 5 years and reaping the profits of your hard work , there is a great likelihood that the goodwill and general market increases and will give you capital gains unlike what government has proposed coffee shop being sold for '0' dollars or should we say being taken back forcefully for nothing .

5. We do not think Option 1 is any good at all . However , if the government is to choose this option going forward , it is effectively a robbery in day light . If it is just about all the policies and goals you are trying to achieve and taking back the coffee shop you sold to us , please return our money back that was taken from us plus some appropriate interest/compensation on top of that , forget about the intentional disruption/termination of the business .

6. There is a statement that it is just for OOTLs and perpetual licences will continue to be leased and traded. This is very nonsensical like the full first option as you can go and get a licence for a very little fee (and there is no limit to the number as you could get as many as you like) it doesnt leave anything to imagination or guessing as to if anybody would sign a lease agreement for expensive weekly lease .

7. Congestion is already in the news and people talk about the effect of increasing population .What do you think is gonna happen when there is a flooding in the taxi industry. You already cannot provide any places to park (taxi ranks) and issue fines to poor drivers everyday trying to find any space to make a terribly small living .Then you shift the blame onto the respective councils. They didnt take the licence money or the registration fess.You charge us double the registration from any other similar private car .Where does all this revenue of licences, fines,rego etc goes and why do you charge if you cannot provide service .

- Option 2 .

Second option is good with an option to extend the suspension.

However there is a sticking point where the 24 zones are reduced to 4 .

It is very simple to explain . All the taxi cpmpanies in Hobart have been trying very -2 hard all these years to service areas like Brighton ,Bridgewater etc and had failed miserably . It is well known and evidenced fact. It has only become slightly better due to housing shortage and more people had to move to these areas, hence more are working there but still only a few more. Bridgewater is not and cannot work like city. Why would somebody go all the way or sit there for little money or no money , while there is a conference finishing in Hobart .A company might give out favours to those drivers who go out to do the jobs as they do for kingston and Bridgewater etc but that doesnt need to be on

the basis / promise of cheap licences to flood Hobart.

So this suggestion that somehow combining the zones would mean more taxis in outer areas makes no sense. On the contrary all those licences would be used to operate taxi services in Hobart and people will start grabbing these cheap licences to operate their business in Hobart. It might be already going on and couple of people might have already purchased these cheap licences.

- Fares.

Setting your own fares and how would it be "regulated". It will give incentive to driver to cheat owner operators, there would be no fear of disrespect or being caught or doing something illegal. How would owners keep track of a whole world of dodgy dealings. Why would drivers report those cash settled fares.

Scenario - A driver charges a passenger \$80 for a fare and taps the credit card. Verbally agreed fare was \$60. How would & who would determine what the agreed fare was, who would check & decide on it. What would be the "regulation".

Scenario - Driver agrees for \$25 cash fare to Glenorchy or even eftpos for that matter and doesn't run the meter. What would force the driver to list or add this fare into the taxi total shift takings. Why would he do it, only reason given could be honesty & fear of being caught. Incentive to list or add the fare drops down heavily as running the meter was not required. If everyone was honest and we were to take people for what they say & what they do, there wouldn't and shouldn't be any laws.

Seems like Transport is mulling the idea of handing over the individual accreditation under the Network control. If this happens it will take our independence away and will further put financial burden on us.

Regards

Amandeep Singh

Accreditation Number - [REDACTED]

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Feedback on taxi Regulatory Review Friday,  
**Date:** 23 November 2018 11:57:29 AM

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Please find below my submission on taxi regulatory review proposed new framework

1 Refer Option 1

That Taxi licences would be retained with supply constraints relaxed over five years  
This is not justified to reduce the value to Zero in five years as this is our Assets purchased  
We have paid \$60000 to buy this plate and \$60000 is our hard earned money and our savings for many years  
We also paid interest to the banks to return the loan taken to buy plate it will have very bad effect on our life  
So we strongly oppose the this option otherwise \$ 60000 may please be returned to save us

2 we have many more expenses as compared to Uber Taxi such as much more Rego ,Insurance,Camra,Car inspection  
Every 6 months and taxi Course etc So it is requested the law should be same for all Taxis

Hope you will consider my request before taking the decision

Yours Sincerely

Amarjit Singh Walia



## **On-demand passenger transport framework - submission**

**Names:** [REDACTED]

**Organisation:** NA

The on-demand passenger transport options paper states: "... for some people and companies who have invested in the taxi industry in the past, changes to the availability of new OOTLs may impact on the value of the licences they already own". In fact the options paper goes on to detail how the value of the licences will be completely wiped out within 5 years. If you issue new licences at no cost, then the value of existing licences will be wiped out, pure and simple. Taking five years to do it will make no difference whatsoever, no one will buy a licence plate in year 1, 2, 3 or 4 with a guaranteed loss-making potential of 100%, nor pay a leasing fee for what they can effectively get for free.

It is imperative that Taxi licence holders do not lose their assets, assets whose value was created by government in a twofold process - both the purchase cost and the artificial controls on regulated areas. To reduce the value of these licences is completely unjust. Taxi operators who have purchased OOTLs in recent years may have large loans to pay off these licences, and with the introduction of an unregulated competitor have had reduced earning capacity in order to service these loans. They are unable to compete on price with ride-sharing drivers who do not have these large overheads. Likewise Perpetual Taxi Licence holders have invested in their licences and to have their value stripped away by a government department which bizarrely appears to find the financial concerns of small business people immaterial to future policy is unjust and hardly represents the small business-focussed policy platform of the elected government. Yes, Tasmania is seen to be "open for business" but if business people can be charged large sums for operational licences by government and then have those values stripped away leaving some people bankrupt and others living in poverty in retirement, then Tasmania won't be seen as a good place for doing business.

There have been precedents for proper compensation in several jurisdictions in Australia and worldwide and across a number of industries, including cray fishing licences and log truck carriers. These compensation schemes were not only related to licence fees, but also to a reduction in earning capacity. The control on the release of abalone licences has seen these assets soar in value, yet no one is inferring that those investors are doing anything other than responding appropriately to market forces.

This is a fundamental issue of equity and fairness. The unjust legislation that created such an uneven playing field for the introduction of ride-sharing must be resolved without further damage to the taxi industry and the licence plate holders, including the hit their income has taken. By properly compensating licence plate holders, both PTL and OOTL, you would enable a fair and just system where current and emerging transport options and technologies can thrive in a market driven economy.

Uber is a taxi company. They don't advertise themselves as such, but if it looks like a duck and talks like a duck ... plus the European Court of Justice (highest court of appeal in the EU) ruled that they are a taxi company and therefore required to meet all the same costs and regulations and other taxi companies, including meeting their responsibilities to their staff and customers as any PCBU must.

The Tasmanian Government wishes to review the regulatory and cost burden on taxi companies, their licence holders and their drivers. However allowing new taxi companies using emerging technologies such as Uber, Shebah and GoCatch to operate with a different cost and regulatory

structure than existing taxi companies while this review is happening is the definition of discrimination.

As such, both the options in the on-demand passenger transport options paper are deeply flawed, discriminatory and unjust.

Option 1 Discriminates against existing taxi companies and seems to suggest that having thousands of dollars wiped off a supported regulated asset is in some way fair and something that one can "adjust to". It also remarks that PTL would continue to be able to be leased and traded. In what world would someone lease or pay for an asset when they can get a similar asset for free?

Option 2 does not deal with the uneven playing field created by the non-licencing of ride-sharing drivers and is therefore also fundamentally flawed. It appears to delay the issues while waiting for ride-sharing to decimate the viability of taxis in the north and north west of the state as they have in the south, by offering lower consumer costs as a direct result of having lower governmentally regulated overheads. It also does not adequately deal with the issues with passenger subsidised WAT and regular taxis which will emerge from 1/7/2109 when the subsidised reduction in fares to NDIS participants ceases, again due to a discriminatory government policy, thereby reducing consumer choice rather than enhancing it.

### **In Summary**

- 1.The government controlled a highly regulated industry. The fees which were paid to the government were paid by people entering into a regulated industry therefore due to the very nature of the regulation they had assets which were protected.
- 2.By supporting the deregulation of part of the industry the government has devalued the asset to which they have charged the licence holder.
- 3.If Government legislation and policy devalues the assets for which they have received payment, they need to reimburse those payments in full.

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Taxi reviews: Things to be considered  
**Date:** Saturday, 24 November 2018 9:47:57 PM

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To the concerned Authorities,

Being an owner operator of taxi plate number [REDACTED], I hereby say that there are some points need to be considered before making any decisions regarding what to do with the taxi plate ownership and operators.

1. I have paid \$60K to own the plate to run a stable business which has been ruined by the state government by allowing share ride sourcing services. Without doing proper arrangement and taking into the consideration of how it will impact the livelihood of the people who paid the government to secure a business.

2. There has been a talk that this decision will keep the taxi operators on their toes, we were already on our knees and now we are so devastated by the growing number of ride source vehicles and community buses and other ways of cutting us off.

3. This decision of government has increased the hidden unemployment multiple times. Hidden employment is the one in which someone looks employed but not making enough money to make the ends meet.

4. Now if you want to keep allowing to run the other ride sources, better you pay us our money so I can start something else or look for a job. This money will buy me some time. Don't jeopardize my future by telling that I will be given 5 years time to operate taxi and cover my money. Give me my money back so I walk out alive from this industry.

5. We were already putting so many hours to make enough money to run our families now with this decision of yours you have no idea how much pressure we are feeling economically. And same time we are getting ostracized from family for not turning on time for dinner or lunch or see kids. Its so devastating.

6. If these concerned authorities won't find a reasonable solution for this trouble thrown at us, you have no idea what and how far our lives/ families will be lost.

7. At least do a unbiased socio- economic research how things are impacting our lives should be done.

Thank you

Regards

Ashwani.

## **Feedback regarding the proposed changes in the taxi industry**

We are extremely disappointed with the proposed changes which the department trying to implement without considering real situation and actual facts. Out of two options the first option is extremely disappointing and scary for every taxi driver and operator. It's a shock to put a plan to scrap the value of taxi plate by 20% every year. If the plan is to reduce the value of reserved price there should be reasonable compensation for existing investors. Otherwise keep the reserve price as \$60000 and let the market decide the value of the plate. That's how the real competition should put into.

While the department trying to follow other state governments regarding these changes we want you to follow the same policy when it comes to compensation as well. Taxi drivers and operators are struggling to find a living due to ride sharing. Competition is fair when there is level fielding game. Hail jobs and taxi ranks are not just enough to survive over regulated taxi industry. So we want the department to put registration and other government fees should be same for taxis and ride sharing.

Proposal to setting up own fares is really welcome.

In short option 1 is unacceptable and zero helpful for drivers and investors. Increasing the number the number of taxis when there is no demand, will create congestion and traffic.

Option 2 is more acceptable but need more steps like compensation for plate owners and reducing cost of operation.

Bastian George

Accreditation no: [REDACTED]

Plate [REDACTED]

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Re: Further information - proposed on-demand passenger transport industry  
**Date:** Saturday, 17 November 2018 4:50:35 PM

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Hi Laura Searle,

I am writing regarding the Taxi licenses deregulation. I totally disagree with the First option to reduce the price of the license because I have moved to Hobart, I can buy my job and can secure my future. As well, I can sell in future if I need money. I know many people have more than one licenses and we can be bank corrupted if it will happen. As my suggestion, Please refund our money or back buy your licenses then we can do something else and also we can pay back loans to the banks. Please think about the Taxi drivers, we are already hardly earning \$10 per hours as a owner operator and the other drivers only \$5 which is very hard to survive. Moreover, Taxi drivers are earning money in Australia and spending in Australia. I believe that other ride share companies are taking commission's money to outside of Australia which can be a cause of recession etc.

Option 2: Its already too many TAXIS in Hobart and very to find parkings in the ranks which is causing trafficking at all the times and also not enough jobs because all long fares has been taken by ride share. We have to do long hours to pay our taxi's expenses which effective our lifestyle and health. All taxi drivers already under heavy stress.

As my suggestion, Hobart taxi services should go to other areas and provide services because we have paid the highest amount for licenses if its becoming 24 areas to 4 areas.

Please think about the taxi operators, they have paid for licenses and need to pay bank loans and can secure their futures.

Regards,

[REDACTED]

Hobart Taxi lic : [REDACTED]

## Taxi and Hire Vehicle Industries Regulatory Review

### Submission of Corporate Cars Tasmania (Michael Skeggs and Mark Vannapreseuth)

1. Corporate Cars Tasmania Pty Ltd (A.C.N. 613 290 627) is a Tasmanian owned and operate luxury hire car and high quality tourism provider which has been in operation for a period of twelve years and has a current workforce comprising of eleven employees.
2. This submission is made in response to the call for submissions in the Proposals Paper October 2018 for the Taxi and Hire Vehicles Industries Regulatory Review ("the Review").
3. Our submission is focussed on how ride-sharing services, assuming they are to continue to operate in Tasmania, should best be regulated within the existing regulation framework. It does not address in a detailed way matters relating to taxis, except to the extent that there is overlap with taxis and arrangements for regulating ride-sharing vehicles.
4. We support the "co-regulatory" model specifically for ride-sharing vehicles advocated by Uber in their submissions to the review – a "plat-form based approach"<sup>1</sup>. The Review at part 12 notes that regulating bookings services "promotes a co-regulatory approach where industry develops and administers its own arrangements, but government provides legislative backing to enable the arrangements to be enforced". Strong and effective regulation of ride sharing, including by regulating the ride-sharing platform, is critical for the safety of the public, the integrity of the system, and in order to have low level but appropriate regulation. This is particularly important if as part 13 of the Review proposes ride-sharing drivers are not required to obtain operator accreditation.
5. A model with the following features is proposed:
  - (a) Replace the current ride-sharing exemption with a category "Ride Sharing Vehicle" – "RSV".
  - (b) Regulate RSVs via a "co-regulatory model" - the approval by the regulator of the booking, review and payment platform from which they operate – i.e. a platform based approach (e.g. Uber, Go Catch) - and the imposition of appropriate vehicle, driver and record keeping standards of the sort that the Review identifies.
  - (c) Retain existing Luxury Hire Car ("LHC") and Restricted Hire Vehicle ("RHV") categories and regulation.
  - (d) If the LHC plate fee is abolished, do so by increments over a staged five year period, and provide for an assistance package to existing LHC operators.
6. As the Uber submissions make very clear, there is a clear and significant difference between ride-sharing services, and commercial providers operating under LHC and RHV regulation. It is appropriate and necessary to regulate them differently. A LHC operator will be a commercial provider, often with multiple hire vehicles and using professional drivers, whereas a RSV operator is more likely to be a part time provider reliant on an IT platform like Uber, as the following examples illustrate<sup>2</sup>:

"I have a full time job where I work from 9-5. Driving with Uber helps me relax at the end of the day. I can just do some hours now and then, whenever I feel like driving. I first signed up for

<sup>1</sup> Uber, Submission to the Taxi and Hire Vehicle Industries Regulatory Review, March 2017.

<sup>2</sup> Uber Submission, page 13.

some extra pocket money to buy a house. **Because of the control via the app, riders behave themselves in your car - it's just like driving my family around!" - Vera**

"I enjoy meeting all different kind of people, and **it's all through the app so there is a feeling of control and safety** — especially compared to when I used to drive a taxi back in the days." – Stu

[Emphasis added]

7. It is essential that RSVs have an approved and sophisticated booking, review and payment platform from which to operate. Uber in their submission make clear why<sup>3</sup>:

"15. Under the **platform-based approach to regulation** described in this paper, **the regulator would set the criteria and standards for ridesharing. However, the regulator would devolve to the platforms the administrative responsibility for checking drivers and vehicles against those criteria and standards. Platform accreditation would be contingent on platforms undertaking these checks. Regulators would audit platforms to ensure that they comply with the terms of their accreditation.**

This system **will improve safety and accountability in the sector.** In this environment, there are strong and direct incentives for platforms to undertake checks diligently. That arrangement will enhance the enforcement capabilities of regulators: **the regulator will liaise, monitor and audit a small number of platforms rather than thousands of unaffiliated drivers and vehicles.**

17. Audit arrangements would **enable the regulator to verify that platforms and ridesharing drivers meet their respective obligations.** Platforms would be visibly accountable for the conduct of driver and vehicle checks, encouraging a greater level of diligence than practised in the traditional disaggregated transport industry.

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1. *Platforms* would be required to reasonably ensure driver compliance and vehicle compliance with applicable standards **before allowing drivers to connect with passengers."**

8. Reforms in 2006 significantly improved how the vehicle standard requirements for a LHC are to be met. There are two main clear objective standards for the main category of LHC, both of which are able to be objectively assessed:
- (a) that the vehicle has a minimum wheelbase of 2.8 meters; and
  - (b) that the vehicle when new cost enough for Luxury Car Hire Tax to apply (which are published by the ATO).

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<sup>3</sup> Uber submissions age pages 11 and 6.

9. The 2006 review<sup>4</sup> noted that the legislation as it was then (and in an updated form, as it remains now):

“Thus the Act has different intents and objects in respect of taxis and luxury hire cars. Both have a focus on safety and minimum quality standards. However, in relation to taxis, there is a strong focus on meeting the transport needs of the community at a reasonable price; whereas in relation to luxury hire cars the focus is on ensuring a premium high quality service...

Luxury hire cars are intended to service that segment of the market that wants a very high quality personal service at a premium cost rather than a standard service.”

10. The only change to the industry and consumers who use it since the 2008 amendments arising from the 2006 review is the advent of ride-sharing services, which can be properly regulated using the co-regulatory/platform based approach outlined in these submissions. Proper regulation of ride-sharing services, provided mostly by part time drivers using their family car, does not require the government to abandon “ensuring a premium high quality service” by regulation of LHCs.
11. There is therefore no existing overregulation, red tape or complexity in how LHC approval is currently regulated and administered. There is therefore no existing undue regulatory burden on LHCs that needs to be reduced.
12. It is important for a consumer to know that what they are buying either meets the standards of a LHC, or that it is a ride sharing service regulated via a sophisticated booking, review and payment system. The LHC standard has provided clear product information to consumers in Tasmania for almost twenty (20) years. The proposed model would enable the consumer to choose if they wanted to purchase an RSV or a LHC.
13. An operator of an RSV could of course apply to be an approved LHC, with a lower (and possibly ultimately abolished) plate fee facilitate them doing so if they wished to.
14. A LHC operator would be subject to a low-moderate amount of additional regulation under this model, compared to an RSV. In our view that is appropriate.
15. No proponent of ride sharing has or is advocating to remove the need for a booking, review and payment system as an essential part of the regulation of ride sharing services. To do so would put consumers and the rest of the industry at considerable risk of illegal operators, operating “off books” from Uber. It would be unsafe.

It would not be in the public interest, for reasons including:

- Ride sharing operators not operating through an approved platform would be more likely to operate in cash transactions and not pay GST and income tax.
- Ride sharing operators not operating through an approved platform would operate wholly outside the “electronic surveillance and accountability” that a platform that tracks, reviews and records driver and trip information provides.
- A “black economy” where fares are solicited, cash paid and transport provided “off the grid” by drivers outside the reputable and approved ride sharing platforms would inevitably drive down standards of ride sharing operators.

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<sup>4</sup> Review of the Taxi and Luxury Hire Car Industries Act 1995 – Paper 6 – Luxury Hire Cars, pages 7-8.



- Ride sharing providers operating legally via Uber or similar, and legitimate commercial operators using LHC and/or RSV, would not then be operating in a fair competitive environment at all.
16. In Queensland, a clear legislative distinction has been maintained between a “limousine license” and a “booked hire service license”<sup>5</sup>. A “limousine license” is comparable to the existing LHC category in Tasmania, including having the same requirement that modern vehicles must have a minimum wheelbase of 2.8 meters. Retaining the existing separate category has not had any negative impact on competition in the Queensland market, or on the inclusion of RSVs into the Queensland regulatory framework.
  17. In Victoria, Part 4 of the *Commercial Passenger Vehicle Industry Act 2017* provides a framework for the registration and regulation of “booking service providers”, which includes Uber and other ride-sharing platforms. Section 23 of the Act provides for statutory duties that must be met by those booking service providers. Section 27 places a duty on drivers (i.e. ride-sharing operators) to co-operate and comply with the requirements of their booking service provider. Section 54 provides that advertising for bookings without registration is an offence, therefore **ride-sharing operators in Victoria are not permitted to operate independently of an authorised and regulated booking service provider**. The Act also provides the regulator with strong investigatory, enforcement disciplinary powers, and overall places moderate-high regulation on booking service providers. By doing so, this “co-regulatory” or “platform regulatory” model controls and regulates individual ride-sharing providers.
  18. Queensland has a similar “Booking Entity Authorisation” system, which requires RSVs to only take bookings through an authorised booking entity.
  19. The model proposed above that retains the existing LHC and RHV categories, whilst providing for RSVs to be properly regulated, adequately addresses all of the objectives and principles of the Review.
  20. An abolition of the LHC plate fee would represent a loss of that asset for operators across Tasmania. RSVs and new entrants would be given an unfair competitive advantage during the transitional period. Staging the phasing in of the fee abolition would in part address that. It would allow a reasonable time for operators to adjust to the change, and to realise some value from the plates and high cost vehicles that they have made a relatively significant investment in, in good faith. It would also assist operators if funding in the form of a restructuring grant could be provided during this period, to assist with upgrades to things like IT booking systems. An example from interstate is the “Industry transition assistance” funding of \$500M introduced by the Victorian government in 2017. A temporary levy of the type in place in New South Wales (\$1.00 per fare) could be used to fund this assistance.
  21. Existing operators would suffer significant loss and damage if the LHC plate system was abolished. In effect this would be compulsory acquisition without compensation by government, which could lead to litigation if operators seek to recover their loss. Being able to display their previous (then redundant) plates would provide no value or compensation. Operators have relied on the government’s representation, for over twenty years, that if they invested in this high plate cost and eligible high cost vehicles they would receive the benefit over the long term. **As recently as September 2018, detailed regulations were made by the Tasmanian Government prescribing the standards and requirements of a LHC**<sup>6</sup>. Significant investment in vehicles and business models are also included in the loss that would be incurred. The need to properly regulate LSVs, which for the reasons noted above are wholly different in character to LSV operators, do not justify this impact on existing LHC operators.

<sup>5</sup> *Transport Operations (Passenger Transport) Act 1994 (Qld)*, Divisions 2 and 3.

<sup>6</sup> *Luxury Hire Car Industry Regulations 2018 (Tasmania)*.

22. The existing designation "Luxury Hire Car" is one created and refined by the Tasmanian Government, over many years. It is known to the Tasmanian market, which knows it to be fundamentally different in terms of vehicle quality and comfort to a ride-sharing service. To remove the LHC category would therefore risk consumers believing that ride-sharing and other operators were providing what had previously been at the standard of "Luxury Hire Car", which would not be the case. This would risk misleading consumers, in addition to dragging down the quality of services available to the Tasmanian public.
23. We provide the following brief submissions about the following other aspects of the Review:
- (a) **Regularity of vehicle safety inspections** – For public safety this should be a formal inspection every twelve months for all vehicles (taxis, RSVs, LHC and RSV).
  - (b) **Auditing of RSVs** – RSVs and their authorised booking platforms should not be permitted to "self-audit".
  - (c) **Medical assessments for drivers** – For all vehicles (taxis, RSVs, LHC and RSV) this should remain at the current three years (or annually for those over the government prescribed pension age). It should not increase to every five years, as a lot can change over that period, and this would risk public safety. The current assessment rules are not onerous. Drivers should not be able to "self-assess", as that would risk fraudulent and/or inaccurate declarations. Public safety should not be put at risk for the sake of saving the relatively low cost of an independent medical assessment as part of the application process.
  - (d) **Transport Commission audits** – All accredited RSV platforms and drivers should be under the same initial audit regime, which could then be reduced (or increased) by the regulator depending on the level of individual compliance.
  - (e) **Safety** – For public safety we support a requirement that all vehicles (taxis, RSVs, LHC and RSV) have a 5 star ANCAP rating.

[REDACTED]  
Michael Skeggs

Director, Corporate Cars Tasmania

23 November 2018

[REDACTED]  
Mark Vannaprasedh

Director, Corporate Cars Tasmania

## Submission to the Taxi and Hire Vehicle Industries Regulatory Review

We wish to comment on two aspects of the proposed framework for the on-demand passenger transport sector in Tasmania:

- (a) Deregulation of the supply of new owner-operator taxi licences; and
- (b) Vehicles.

We base our comments on information provided in a letter dated 16 October 2018 from Penny Nichols, General Manager Road User Services, Department of State Growth and relevant materials found on the department's website: [www.stategrowth.tas.gov.au](http://www.stategrowth.tas.gov.au).

Our comments are as follows:

### (a) Deregulation of the supply of new owner-operator taxi licences

With the commencement of Uber and other ride-sourcing platform providers in Tasmania in December 2016, the sale and leasing of perpetual licences on the open market has been adversely impacted. This development in turn created uncertainty for the operators of taxis in Tasmania and has disrupted the business model under which these taxi operators have conducted their businesses. While this situation may be perceived by some as no more than one of the many hazards of conducting a business, it has nevertheless caused and will continue to cause financial hardship and uncertainty in the taxi industry.

Against this background, the Department of State Growth is contemplating two different options in relation to the availability of new owner-operated taxi licences (OOTLs).

We believe Option 1, that is, the placing of no limits on the number of new OOTLs available each year and the reduction of the reserve price over five years, would bring about greater uncertainty in the taxi industry, particularly in those regions where the current minimum price of an OOTL represents a substantial investment for an owner-operator. Any prospective owner-operator would not be motivated to invest in an OOTL in Year 1 at the "current minimum price" when at the same time they would know that an OOTL could be purchased in Year 2 at a price reduced by 20 per cent or purchased in Year 3 at a price reduced by 40 per cent and so on until Year 6 when OOTLs would be available by application and payment of an administrative fee only.

The uncertainty caused by the implementation of Option 1 would further exacerbate the disruption of the open market for the sale and leasing of perpetual licences brought about by the commencement of ride-sourcing platforms. It would also adversely impact the value of taxi licences previously purchased by owners of such licences. Whilst the introduction of ride-sourcing platform providers has resulted in greater competition and consumer choice, this development combined with the implementation of Option 1 would hamper the operation of the taxi industry as it would result in increased financial loss and reduced investment in the taxi industry.

Accordingly, we consider that Option 2, that is suspending the issue of new OOTLs for five years and reducing the existing 24 taxi areas to four at year three, is the preferred option.

As a side comment, the operation of the taxi industry is in effect a partnership between the Tasmanian Government and those persons working and investing in the Tasmanian taxi industry. Many of the investors are from within the taxi industry in Tasmania and other parts of Australia and have devoted their lives and savings to the taxi industry. The adoption of Option 1 at this point or



the adoption of a similar framework in the future would adversely impact upon the financial situation of many of these people. Whilst investors should anticipate some losses over a long period of time, they cannot tolerate the total loss of their capital. It is also in the interests of governments that investors not suffer devastating losses, particularly in circumstances where investors, large and small, have partnered with governments in industries such as the taxi industry. Investors need to retain confidence in regulatory frameworks set up by governments and any loss of confidence could have long-term implications.

It is not clear how the taxi industry in Tasmania will develop over the coming years and the Tasmanian Government may well find that it will need to rely on investors to re-invest in the industry at some point in the future. For this reason, we would urge that the Tasmanian Government, when formulating any future regulatory framework for the taxi industry in Tasmania, adopt frameworks that do not result in devastating losses for investors. If such losses cannot be avoided, then adequate compensation should be paid.

(b) Vehicles

The Department of State Growth has stated that the new framework “prioritises safety and regulation for safe vehicles is required” and, as part of this strategy, has stated that taxis shall continue to require additional equipment, including a security camera. We agree with the need to prioritise safety, including the need for security cameras in taxis, but consider that the need for security cameras should apply to all vehicles used by ride-sourcing platform providers.

Whilst the introduction of ride-sourcing promotes greater competition and consumer choice, this benefit should not override the need to ensure the safety of the public. If the prevailing conditions in certain parts of Tasmania are such that taxis are required to have security cameras, it is difficult to understand from the perspective of safety why this requirement is not extended to vehicles used by ride-sourcing platform providers.

The Department of State Growth justifies the continuation of the requirement for additional safety equipment on the grounds that it is only taxis that work in “the relatively higher risk (anonymous) rank and hail markets”. As the use of security cameras protects both drivers and passengers, the fact that vehicles used by ride-sourcing platform providers are not required to install security cameras means that passengers are not fully protected. In addition, while ride-sourcing vehicles are not supposed to work in the rank and hail markets, this is very difficult to enforce.

Submission by:

(a) J Browne Pty Ltd ATF Browne Superannuation Fund (Licence No. [REDACTED])

(b) David Browne (Licence Nos [REDACTED] and [REDACTED])

24 November 2018

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Taxi and Hire Vehicle Industries Regulatory Review  
**Date:** Monday, 29 October 2018 4:57:14 PM  
**Attachments:** [image003.png](#)  
[image005.png](#)  
[image006.png](#)

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Gary Swain  
Commissioner for Transport

As the holder of Hobart Perpetual Taxi Licence [REDACTED] I wish to make a submission to the abovementioned Review.

I have given due consideration to the two options that are being proposed in relation to the availability of new OOTLs and other changes to the regulatory framework and I am in favour of Option 2.

As a long term investor in the Hobart taxi industry I believe this option with its slower approach to making changes, will without doubt provide the best outcome for all stakeholders and enable the Government to best achieve the five priorities listed in the review document.

Regards

**Dennis Howe OAM**  
**Director**



**Aus Mining Personnel Pty Ltd**

**Tel:** 07 4041 1377 **Fx:** 07 4031 3143

**Email:** [REDACTED]

**Web:** [www.ausmining.com.au](http://www.ausmining.com.au)

**Address:** Suite 22/29 Grafton St

PO Box 2175, Cairns Qld 4870

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**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Taxi plate compensation. Monday, 19  
**Date:** November 2018 8:49:48 PM

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Dear sir/madam

I Devendra Kunwar completely saddened to learn that Transport Department is going to have some major changes in terms of value of taxi plates. I own two taxi plates of worth \$195000 and I want to get full value of my taxi plates as this is only one my living source, without taxi business my life would be bankruptcy. Apart from taxi business, I have little knowledge in other industry so I want full compensation of taxi plates investment.

I have been in this business since six years and I bought these two plates by rewithdrawing house repayment. This is my huge investmemt and I cannot affoard yo lose it whatsoever.

Devendra Kunwar

[REDACTED]

Taxi plates Details

[REDACTED]

[REDACTED]

Sent from Yahoo7 Mail on Android

Sent from my Samsung Galaxy smartphone.

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** On-demand Passenger Transport Changes  
**Date:** Thursday, 4 October 2018 8:57:43 PM

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Hello,

I am writing in regards to the changes proposed for OOTL's.

After reviewing the two options under consideration I am in support of option 2.

The introduction of Uber has already reduced available customers for taxi drivers and the amount of taxi drivers are already oversaturated in the Hobart area.

Giving 5 years to adjust to the changes in the transport industry will assist with drivers livelihood and the current detrimental changes to their earnings.

I do not support option 1, as this will further over-saturate the market and negatively impact on income that drivers currently depend upon.

Regards, Devi Sharma

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Change and feed back , Monday, 1  
**Date:** October 2018 4:12:30 PM

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Hi sir I think stoop Uber from state .2 make owner responsible letter separate and driver responsible separate then public can complains easy to driver or owner staraiggt the you .3 about fare prepaid it's no good on owners now more kilometre cab running less money as well as movement of driver making &150.00 kilometre 250 kilo meter cab run it's hard we pay petrol and service must have to start meter . Fair deal always . Driver safety or passenger should be by transport cover by trapper worker compensation it's will can be chage by owner and driver pay to state gov now day many on road owner don't have liability and workercomp also taxi insurance so it control by state is good for future I m happy to pay workercomp liabilities, isurace shoud only one amount . That's my feed back you will like it thanks Devi Shsrma need call [REDACTED]

Sent from my iPhone



**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** RE: PROPOSED REGULATORY FRAMEWORK FOR TAXIS IN TASMANIA : Option 2 – Suspend the issue of new OOTLs for five years and deregulate the existing 24 taxi areas to four at year three. Thursday, 8  
**Date:** November 2018 10:38:40 AM

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Please post the following:

As a perpetual plate owner of [REDACTED] it is requested that ***Option 2 – Suspend the issue of new OOTLs for five years and deregulate the existing 24 taxi areas to four at year three***, be adopted.

Please understand that the taxi plate income received is used to fund my existing retirement and quite frankly I cannot afford to lose my hard earned "asset" investment and income that keeps my livelihood going because of the legalisation of unregulated ride-sourcing and the influx of owner-operator taxi licences (OOTLs).

Endre Kovacs

M [REDACTED]

[Sent from Yahoo7 Mail on Android](#)

From: [REDACTED]  
To: [Taxi Review \(StateGrowth\)](#)  
Subject: Taxi Submission  
Date: Saturday, 24 November 2018 6:15:10 PM

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Dear Sir/Madam

- Option 1 .

Deregulation is not a proven method as it has not worked in different parts of the world .

1. Standards have come down because of deregulation. Every other person buys a cheap car ,has no knowledge and expertise about providing transport service will move in and out of the industry .

2. Because of the ease of getting into the industry with minimal investment and stake and with more & more cabs on the road and less & less money to make , operators will do all the dodgy they can to save money . One way is to save on maintenance and increasing the risk for passenger and public .

3. It would be a stab in the back for the people who have invested in their licences trusting the government .Having their licences as their superannuation and retirement savings .

4. It is not like a coffee shop business .It is very absurd to compare like this .A coffee business after operating for 5 years and reaping the profits of your hard work , there is a great likelihood that the goodwill and general market increases and will give you capital gains unlike what government has proposed coffee shop being sold for '0' dollars or should we say being taken back forcefully for nothing .

5. We do not think Option 1 is any good at all . However , if the government is to choose this option going forward , it is effectively a robbery in day light . If it is just about all the policies and goals you are trying to achieve and taking back the coffee shop you sold to us , please return our money back that was taken from us plus some appropriate interest/compensation on top of that , forget about the intentional disruption/termination of the business .

6. There is a statement that it is just for OOTLs and perpetual licences will continue to be leased and traded. This is very nonsensical like the full first option as you can go and get a licence for a very little fee (and there is no limit to the number as you could get as many as you like) it doesnt leave anything to imagination or guessing as to if anybody would sign a lease agreement for expensive weekly lease .

7. Congestion is already in the news and people talk about the effect of increasing population .What do you think is gonna happen when there is a flooding in the taxi industry. You already cannot provide any places to park (taxi ranks) and issue fines to poor drivers everyday trying to find any space to make a terribly small living .Then you shift the blame onto the respective councils. They didnt take the licence money or the registration fess.You charge us double the registration from any other similar private car .Where does all this revenue of licences, fines,rego etc goes and why do you charge if you cannot provide service .

- Option 2 .

Second option is good with an option to extend the suspension.

However there is a sticking point where the 24 zones are reduced to 4 .

It is very simple to explain . All the taxi cpmpanies in Hobart have been trying very -2 hard all these years to service areas like Brighton ,Bridgewater etc and had failed miserably . It is well known and evidenced fact. It has only become slightly better due to housing shortage and more people had to move to these areas, hence more are working there but still only a few more. Bridgewater is not and cannot work like city. Why would somebody go all the way or sit there for little money or no money , while there is a

conference finishing in Hobart .A company might give out favours to those drivers who go out to do the jobs as they do for kingston and Bridgewater etc but that doesnt need to be on the basis / promise of cheap licences to flood Hobart.

So this suggestion that somehow combining the zones would mean more taxis in outer areas makes no sense . On the contrary all those licences would be used to operate taxi services in Hobart and people will start grabbing these cheap licences to operate their business in Hobart . It might be already going on and couple of people might have already purchased these cheap licences .

- Fares .

Setting your own fares and how would it be “regulated”. It will give incentive to driver to cheat owner operators ,there would be no fear of disrespect or being caught or doing something illegal . How would owners keep track of a whole world of dodgy dealings .Why would drivers report those cash settled fares.

Scenario - A driver charges a passenger \$80 for a fare and taps the credit card. Verbally agreed fare was \$60. How would & who would determine what the agreed fare was,who would check & decide on it . What would be the “regulation”.

Scenario - Driver agrees for \$25 cash fare to Glenorchy or even eftpos for that matter and doesnt run the meter . What would force the driver to list or add this fare into the taxi total shift takings. Why would he do it , only reason given could be honesty & fear of being caught. Incentive to list or add the fare drops down heavily as running the meter was not required . If everyone was honest and we were to take people for what they say & what they do ,there wouldn't and sholdn't be any laws .

Seems like Transport is Mulling the idea of handing over the individual accreditation under the Network control. If this happens it will take our independence away and will further put financial burden on us .

Regards

Gagandeep Singh Virk

Accreditation Number - [REDACTED]

1 Nov 2018

Mr Gary Swain  
Commissioner for Transport  
GPO Box 536  
Hobart TAS 7001

Via email: [taxireview@stategrowth.tas.gov.au](mailto:taxireview@stategrowth.tas.gov.au)

Dear Mr Swain,

RE: On-demand passenger transport industry

We are writing to you in relation to the recent letter received by your department (ref: D18/222421).

From the documents from your departments website "Fact sheet – booked fares" we as stakeholders in the industry are very much in favour of voting for Option 2.

Should you wish to contact me to discuss further please feel free to contact me directly on [REDACTED] or [REDACTED]

Yours sincerely [REDACTED]

Garry Quan

(owners of [REDACTED])

Tania Chung

Mr Gary Swain  
Commissioner for Transport  
GPO Box 536,  
HOBART TAS 7001

Email: [taxireview@stategrowth.tas.gov.au](mailto:taxireview@stategrowth.tas.gov.au)

### **Re: Submission - Taxi & Hire Vehicle Industries Regulatory Review**

I am submitting this in response to the Taxi & Hire Vehicle Industries Regulatory Review Proposal Paper issued in October 2018.

I am a Perpetual Taxi Plate owner and operator, working in the taxi industry in Hobart from last 10+ years. The biggest concern I have regarding the changes outlines in the Proposal Paper is that the current market price for the Perpetual Taxi Licenses will go down dramatically. I bought the Hobart Perpetual Taxi License for \$125,000 each (Our family bought three) couple of years ago. The Perpetual Taxi Licenses in Tasmania is very different from other major Australian States as it doesn't have the same amount of major investors. Perpetual Taxi Licenses in Tasmania are typically owned and operated by individuals who have held these licenses as their superannuation. Also, these licenses provide the main income to those operators as their livelihood.

As stated in papers issued, by accepting a proposal to speed up the transition to deregulation consideration would be given to compensation for Taxi Plate owners but there is no compensation mentioned in the papers. I believe that the compensation for the Perpetual licenses Holders should be the government to buy those perpetual licenses back from the owners. I could not understand that why the governments do not want our assets (Taxi Licenses) to grow in value where they have no issue when real estate market or many other assets grow Australia wide every year.

### **Choosing Option 2**

I will go for the Option 2 which would give me more time to think and to see the market changes and to decide whether I would like to stay in this business anymore or not. The opportunity to continue with Perpetual Taxi Licenses remaining as a leasable item is a positive. The restriction on leasing of Owner Operated Taxi Licenses should be retained.

### **ANCAP Five Star Rating**

ANCAP 5 star rating is a good idea to ensure the safety of passengers using the services of ride-sourcing vehicles and Taxi services.

### **Removing Tariff 3 & 4 for WAT taxis**

For WAT taxis reducing the tariff to Tariff 1 & 2 only, there should be the introduction of meter activation immediately upon arrival at the destination, as exists in other jurisdictions. It will support that WAT drivers earn enough to keep driving WAT vehicles.

**Reduce the Credit Card surcharge to 5 per cent.**

I have no objection to this.

**Regulation of Operators**

As Taxi Combined Services already provides the Taxi Security Camera installed in the taxi. This is backed up with provision of an Electronics Technician on site and the maintenance and repair or replacement of this equipment. I believe that ride sourcing vehicles must have the similar security cameras installed in them by their operators to ensure the passengers safety.

As a taxi operator runs a taxi with a taxi network-which is an accredited body and the taxi operator still must have the accreditation; Similar way a ride sourcing operator who runs his vehicle with a ride sourcing company, that operator must have an accreditation too to assure the safety of the passengers.

Working with vulnerable people card should be the same for UBER drivers as well which should be for employment purpose instead of volunteer.

The annual fee of Perpetual Taxi License Holders now should be reduced or removed to make it level playing field for taxi industry and ride-sourcing industry. Having both the Taxi and Ride-sourcing industries to have security camera, have accreditation and similar annual fee will provide the level playing field for both industries.

**Self-assessment medical declarations**

The self-assessment medical declaration should not be welcomed by both the taxi industry and ride sourcing industry. It could be very dangerous for public safety. I believe the medical must be compulsory every 3 years for both the Taxi and Ride-sourcing operators.

Yours sincerely,



Harjinder Singh Grewal and Paramjeet Kaur Grewal  
Taxi Owner and Operator

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** taxi review submission  
**Date:** Saturday, 24 November 2018 11:53:46 AM

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Dear Garry Swain,

Firstly, I like to thank the state government for letting me express my views on the recent proposed regulatory changes. I would also like to express my deep disappointment about the government decision to legalize an American based app company "uber" and like to operate in Tasmania.

I moved to Tasmania in 2011 and am the owner/operator of the taxi license [REDACTED]. I am the sole income earner of the young family of four people. I am greatly concerned that with the introduction of ride sharing and now these proposed changes will affect my ability to feed my family. I further feel that due to continuous declining of my ability to make profits from driving a cab might force me to stop working for the peanuts and look the easy way of Centrelink.

Here are some of my views on the proposed changes:

**DEREGULATION OF OOTL'S:** In my view the present system of regulated industry is working fine in the best interest of all industry stakeholders. I highly suspect that further increase in the OOTL's would substantially reduce the driver income and ultimately affects the efficient delivery of the service. I bought the license from the state government truly believing to have exclusive right to provide taxi service in Hobart. If now the government wants to alter that I think it would be fair both morally and ethically to buy back the license amount from the interested holders.

**DEREGULATION OF FARES:** In my opinion this would create unnecessary chaos among drivers and operators regarding the share money as operators cannot know how much the drivers are charging from the customers. This could also lead to the arguments between the customer and drivers while negotiating the fare. The present fare structure should remain unchanged as further decrease in fare would reduce the profits margins even more.

**DEREGULATION OF THE DRIVERS AND OPERATORS:** I think that anyone providing passengers transport service should be properly accredited and trained. There should be no difference between someone who is driving taxi or ride sharing as both are doing same job. This also goes well with the government motive of equal level playing field for everyone.

At the end I want to reiterate that any change to deregulate the OOTL's would be a big disaster to already struggling taxi industry and could be the last nail in the coffin. I would like to thank again the government to give me this opportunity to express my views on this utmost important issue which directly affect my livelihood.

Best regards

HARJOT SINGH DHILLON

## **Submission for Taxi and Hire Vehicle Industries Review Proposal October 2018**

I wish to make a submission regarding the above review, as I have been an active participant within the Taxi industry for 28 years. Starting as a driver, progressing to be an owner operator, purchasing 2 Perpetual Licences over a period, then an investor, leasing both taxi plates to third parties. Having seen many changes within the Taxi Industry over the time and the associated struggles that participants have had to endure. Fluctuating profits and costs, release of more Taxi Licences being the OOTL, (Owner Operator Taxi Licence) driver incomes that have shrunk considerably. With the greater number of Public passenger providers competing for the travelling public and business transport requirements in Hobart Taxi Area.

After the release of the ACCC reports into business monopolies, the taxi industry had to contend with change to allow more providers for passenger transport. So, more providers came into the market, Community Transport Service Tasmania (CTST), Red Cross and Government listed community welfare groups being able to, with Government funding, purchase vehicles that suited their needs, (Wheelchair accessible and multi passenger). Hire Car legislation allowed more freedom for hire car operators to enter the day to day market of travel. The Government released OOTL's into the market to increase the number of taxi licences within Tasmania. The Tender process changed from a high figure, close to the selling rate of a Perpetual licence, settling at a figure close to 60% of a Perpetual Licence. Perpetual Licences have decreased in value by up to 30% since OOTL's arrived. Now the Government want to make OOTL's have no value at all. With a small increase in population, cost of living rises and only small increases in regulated fares, the earning capacity of Owner's, Driver's and even Investors has decreased dramatically.

The three major Radio Dispatch companies in the Hobart area create competition between each other, employing Tasmanian people to provide a service for the travelling public. They have Owners, Drivers and Investors paying for their service. Meaning every dollar produced by these companies and their operators within the networks, stay's within Tasmania. Not like Uber (including Uber Eats and Uber Business) that take 25% of the traveller's fare clean out of Tasmania and returns nothing. And we provide Uber with free access to all our resources, with designated parking areas and free reign.

Current figures showing that taxi travel has decreased by 10%, radio Calls by 10% and street/hail work by as much as 15%. An Increase of ease of access to transport providers, (all we need is a smartphone), multiple choices for transport providers, has had a significant effect on the taxi industry. Mobile phones have allowed travelling public to access a provider since their inception, again causing a downfall in radio dispatched jobs and allowing smaller providers to compete against the larger networks.

The Taxi industry provided an important option for Disabled/Handicapped and Service Providers for such and the Elderly and Infirm. This has diminished with the growing providers that are now in this market. Government granted wheelchair accessible/ multi passenger vehicles, CTST, Red Cross etc (at a cost to the consumer). All now competing for a slice of this market.

All increases in Taxi fares have been set by the Tasmanian Government Regulator, meaning that the Government has set all fares able to be charged by Taxi's. Operators have been at the mercy of increased costs (Rego, Insurance, Fuel, Maintenance, Accreditation etc) for very small fare increases over the last 20 years. Not even keeping up with CPI. So Daily takes have decreased, and costs gone up, limiting a driver's income, Now below the poverty line. Not even earning \$10 an hour, this is not even half the minimum wage for a 30 Hour week. Leaving drivers to work 60+ hours a week to at



least earn a minimum wage they can afford to live on. This now brings into the argument that longer hours could mean a risk to health and safety to remain viable. The Taxi industry can't Price Gouge like Uber can when demand exceeds supply. Fares are set and regulated by the sealed meter.

What has the Government done to review the impact that ride sourcing has had on the Taxi Industry?

Surely the Government's best interests are served by maintaining a viable Taxi Industry to ensure the community are serviced. A continual increase of licences into the market and static demand will be detrimental to the industry, its participants and the community.

### **Option 1**

#### **UNFAVOURABLE**

All persons that are or invested in the industry are pushed to a very small-time frame.

Sale of future OOTL's will cease as persons will not purchase something for \$60,000.00 that in 5 years' time they can get for the cost recovery fee (issue fee) which will be minimal compared to the purchase cost in the 5-year period.

Anger regarding current OOTL's and financial investment made by numerous people being worth nothing after 5 years.

### **Option 2**

Preferred option with the transition moves starting in 5 years, allowing time to review the results on a definite time frame.

Suspend the release of OOTL for 5 years with option of further moratorium on release, with a review of such at the end of 5 years.

Introduce a buy back scheme to bring licence numbers back to pre OOTL times.

Perpetual Licence (PTL) numbers to remain as the stable market indicator. (current market sale value and future market sale value will be determined by the demand of licences within the 5-year period).

Allow impact studies to be done on every area of the industry and the effects on passenger transport services, customers and all current providers within the passenger transport industry.

Licence all LHV, RHV and RSV as per the proposed structure for Booked Service Licence, have all such operators hold Accreditation, with reviews in place on a set time frame.

With Ride Source Vehicles (RSV), LHV and RHV becoming Booked Service Licence, allow the market to determine the supply required.

Have the major networks look at the impact that the proposed review has on them regarding the structure of Chain of Accountability, over the current model where Responsible Operators/Driver are accountable

Taxi Subsidy Program needs to be kept as a strong tool for the taxi industry and remain one of the viable means of income for the taxi industry. Other than hail, rank and dispatch work.

Review fare structures and assess the impact, to make them more user-friendly, for consumer and taxi industry allowing a more flexible structure (various Tariff changes to suit time and demand).

**Suggested Option 3**

Introduce Buy Back of all PTL and OOTL Licences. Restructure industry from ground up allowing one licence option for participants wishing to be a part of a passenger transport service. Administer this service through current networks and ride sharing platforms. The number of participants will be determined by the passenger transport market.

I look forward to further consultation with Government and participants, regarding the future of the industry.

Yours Sincerely

Ian Cartledge

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Taxi Regulation Review response  
**Date:** Saturday, 10 November 2018 3:27:25 PM

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Dear Mr Swain

I write in response to the letter I recently received regarding the Taxi and Hire Vehicle Industries Regulation Review. I own a perpetual taxi plate ([REDACTED]) via Jade Fund Pty Ltd (my Self Managed Superannuation Fund corporate trustee).

Having reviewed the options provided, I am in support of Option 2. The taxi plate owned by my SMSF was always an important part of my retirement planning and of course its loss of income and value would impact this planning very adversely. I am now retired and am relying on taxi lease income in part for my retirement support. Option 2 will give me 5 years in which to help recover some of the loss of the financial investment I have made in the industry and will hopefully provide me with at least some certainty over my retirement income in the coming 5 years. I am also very concerned for those plate owners who have entered the industry more recently than myself and who face a very severe financial loss. Option 2 goes further in helping them and myself recover part of this loss. I am strongly opposed to Option 1, which I feel will impact my retirement and financial situation and those of other plate owners more quickly and severely.

On other points in the Review, I am very much in favour of the attempt to level the playing field between taxis and ride-sharing operations, and approve of the overall direction of the Review. I am in favour of strong controls regarding passenger safety for all passenger services - driver and vehicle checks in particular. I am also in favour of allowing taxis to negotiate prices on booked fares. Competition against unregulated ride-sharing fares has been impossible up to now, given the regulation of taxi fares.

Thank you for the opportunity to provide feedback on the Review.

Yours faithfully,

Janet Lavelle  
Director  
Jade Fund Pty Ltd ATF Jade Super Fund

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Re: Further information - proposed on-demand passenger transport industry  
**Date:** Tuesday, 20 November 2018 6:20:45 PM

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To  
Gary Swain  
Commissioner for Transport  
GPO Box 536  
Hobart Tas 7001

Sir ,

As per your request , I would to like express my reply for your mail.

I have owner operator Taxi plate [REDACTED] for last seven years.

I have finished my bank loan \$ 60,000 to purchase taxi plate from the government .

I've family with three children. I am driving taxi to look after my family. I don't want to realise more taxi plate in future already have UBER reduces my business at the bottom line .

I don't want to value of taxi plate zero after five years.

The government will decide the value of taxi plate zero in future . So

I need my \$ 60000 return the taxi plate

value which government decided on the time purchased the taxi plate.

I do my another business for \$ 60000 to look after my family.

I go to option two as taxi review information letter from state transport department .

I will advice also to reduce expenses for taxi such as registration, inspections and annual fees , audit.

This is the time of competition so we will beat UBER.

I send my advice to best of my knowledge to take review as soon as possible so will do my business successfully.

Thanks

Regards

Jasvinder Singh

[REDACTED]

Mr Gary Swain  
Commissioner for Transport  
GPO Box 536,  
HOBART TAS 7001

Email: [taxireview@stategrowth.tas.gov.au](mailto:taxireview@stategrowth.tas.gov.au)

**Re: Submission - Taxi & Hire Vehicle Industries Regulatory Review**

I am submitting this in response to the Taxi & Hire Vehicle Industries Regulatory Review Proposal Paper issued in October 2018.

I am a Perpetual Taxi Plate owner and operator, working in the taxi industry in **Launceston** from last **5** years. The biggest concern I have regarding the changes outlines in the Proposal Paper is that the current market price for the Perpetual Taxi Licenses will go down dramatically. I bought the **Launceston** Perpetual Taxi License for **\$90000 three years ago**. The Perpetual Taxi Licenses in Tasmania is very different from other major Australian States as it doesn't have the same amount of major investors. Perpetual Taxi Licenses in Tasmania are typically owned and operated by individuals who have held these licenses as their superannuation. Also, these licenses provide the main income to those operators as their livelihood.

As stated in papers issued, by accepting a proposal to speed up the transition to deregulation consideration would be given to compensation for Taxi Plate owners but there is no compensation mentioned in the papers. I believe that the compensation for the Perpetual licenses Holders should be the government buy those perpetual licenses back from the owners at their current value which is **\$100,000 in Launceston**. I could not understand that why the governments do not want our assets (Taxi Licenses) to grow in value where they have no issue when real estate market or many other assets grow Australia wide every year.

I will go for the Option 2 which would give me more time to think and to see the market changes and to decide whether I would like to stay in this business anymore or not. The opportunity to continue with Perpetual Taxi Licenses remaining as a leasable item is a positive. The restriction on leasing of Owner Operated Taxi Licenses should be retained.

I believe that the Perth Licenses should operate as it is now. As there are lot of Launceston Perpetual taxis, OOTL's, Luxury hire cars, Restricted hire vehicles and UBER cars are working in Launceston area already and the supply of vehicles are already more than the demand. There is not enough work in Launceston area and it is not feasible if another 15 Perth cars will be allowed to work in Launceston area. Also, there is a huge difference between the price paid by the Launceston Perpetual Licenses Holders as compared to Perth Perpetual Licenses Holders.

**Reduce the Credit Card surcharge to 5 per cent.**

As Taxi Combined Services already provides the Taxi Security Camera installed in the taxi. This is backed up with provision of an Electronics Technician on site and the maintenance and repair or replacement of this equipment. I believe that ride sourcing vehicles must have the similar security cameras installed in them by their operators to ensure the passengers safety.

Working with vulnerable people card should be the same for UBER drivers as well which should be for employment purpose instead of volunteer.

As a taxi operator runs a taxi with a taxi network-which is an accredited body and the taxi operator still must have the accreditation; Similar way a ride sourcing operator who runs his vehicle with a ride sourcing company, that operator must have an accreditation too to assure the safety of the passengers.

The annual fee of Perpetual Taxi License Holders now should be reduced or removed to make it level playing field for taxi industry and ride-sourcing industry. Having both the Taxi and Ride-sourcing industries to have security camera, have accreditation and similar annual fee will provide the level playing field for both industries.

The self-assessment medical declaration should not be welcomed by both the taxi industry and ride sourcing industry. It could be very dangerous for public safety. I believe the medical must be compulsory every 3 years for both the Taxi and Ride-sourcing operators.

### **Removing Tariff 3 & 4 for WAT taxis**

For WAT taxis reducing the tariff to Tariff 1 & 2 only, there should be the introduction of meter activation immediately upon arrival at the destination, as exists in other jurisdictions. It will support that WAT drivers earn enough to keep driving WAT vehicles

Yours sincerely,  
Jaswinder Singh Virk  
Taxi Owner and Operator

5 Nov 2018

Mr Gary Swain  
Commissioner for Transport  
GPO Box 536  
Hobart TAS 7001

Via email: [taxireview@stategrowth.tas.gov.au](mailto:taxireview@stategrowth.tas.gov.au)

Dear Mr Swain,

RE: On-demand passenger transport industry

We are writing to you in relation to the recent letter received by your department (ref: D18/222421).

From the documents from your departments website "Fact sheet – booked fares" we as stakeholders in the industry are very much in favour of voting for Option 2.

Should you wish to discuss further please feel free to contact my son directly on [REDACTED] or [REDACTED]

Yours sincerely

Jean Quan

(owners of [REDACTED])

**From:** [REDACTED]  
**To:** [Taxi Review \(StateGrowth\)](#)  
**Subject:** Feedback on Changes to Regulatory Framework  
**Date:** Saturday, 24 November 2018 11:02:26 AM

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To whom it may concern,

I have thoroughly read all potential changes to the on-demand passenger transport industry and considered implications of both options provided. I believe Option 2 (“suspend the issue of new OOTL’s for five years and reduce the existing 24 taxi areas to four at year three”) will result in a more gradual reform to the sector and enable those affected to adapt to the new market conditions more preferentially than Option 1. This as mentioned will improve competition and efficiency whilst securing the confidence of individuals involved in the market.

Regards

Sent from my iPad