



Cairns Taxis Limited ABN: 22 009 754 705

Submission No. 7
11.1.10
28 September 2015

Ph: (07) 4048 8311
Fax: (07) 4048 8399
Mail: PO Box 200
Bungalow QLD 4870

Office: 16 Comport Street
Portsmith

info@cairnstaxis.com.au
www.cairnstaxis.com.au

28 September 2015

Submission

Bill to increase certain penalties in the *Transport Operations Act 1994*

Cairns Taxis Limited (CTL) congratulates the Katter Australia Party for this initiative and is pleased to have an opportunity to make this submission for consideration by the committee.

CTL is deeply concerned that the Queensland state government seemingly is unwilling to take appropriate action so as to ensure that existing laws are upheld by all persons or organisations providing taxi services.

The illegal activities of Uber and other providers of similar so called "ride share services" are causing huge damage to existing industry participants and threaten to seriously undermine all the past efforts of government and industry which has resulted in the Queensland taxi industry being widely recognized as the best in Australia.

CTL is not opposed to fair competition. However, allowing Uber to operate without complying with all of the laws that are required of existing taxi operators is inherently unfair. As well as causing financial damage to existing operators it is exposing members of an unsuspecting public to considerable risk. Public safety is clearly one of the main reasons for the huge amount of legislation that currently applies to taxi operators and drivers yet the state government seems content to allow Uber (and others) to operate illegally!

Set out below are the main legislative requirements which govern CTL, operators and drivers and which the government apparently is allowing UBER to ignore:

Public and Driver Safety:

- All CTL drivers are fully authorised by the Department of Transport and Main Roads (TMR). To obtain this authorisation, drivers have to undergo police criminal background checks and complete a five day training course. Total costs are approximately \$750. *Uber drivers do not comply!*
- All CTL cars undergo stringent TMR safety inspections every six months. *Private vehicles as used by Uber are not subject to compulsory safety checks.*
- All CTL cars are equipped with security cameras and GPS monitoring. In the event of an incident, emergency procedures are implemented by trained Call Centre staff; the location of the vehicle is immediately determined and communicated to police as well as other cars in the CTL fleet. *Similar protection is not available with private vehicles used by Uber.*
- A zero blood alcohol level is required by CTL drivers. *Private drivers engaged by UBER may have a level of up to .05.*
- All CTL taxi vehicles are subject to a maximum age restriction. *Private vehicles used by Uber are not so controlled.*

- In the unfortunate event of an accident, every CTL customer is covered by a public liability insurance policy. *What cover is provided by Uber?*

Customer Service:

- Maximum taxi fares are prescribed by government. CTL has processes in place to provide assurance that customers are not charged more than the legislation allows. *Uber does not comply.*
- Last financial year, CTL taxis performed over two million individual jobs. Government prescribed minimum service levels are consistently exceeded by CTL but failure to meet the standards could lead to termination of the service contract. *Uber does not comply with a similar contract.*
- Under the terms of its service contract, CTL is obliged to provide similar levels of service to all customers within the Cairns Taxis service area. This includes customers requiring transport from outer suburbs as well as those with disabilities requiring vehicles with wheel chair capability. *Uber drivers are not so obliged.*
- CTL offers a booking service via traditional telephone call, automated telephone service, and through our industry leading booking App. *Uber only offers service through an App.*
- Lost Property: Every reasonable effort is made by CTL to have lost property returned to owners. This again is a legislated requirement. *Uber does not comply.*
- While CTL receives comparatively few complaints, when they are received, the company has the facilities and processes in place to ensure thorough investigation. In fact, every taxi job can be recalled with full details of meter charges and route taken visually presented on a map. *What facilities are there to have dissatisfaction addressed with UBER?*

Licensing:

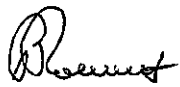
- All CTL taxi owners are licensed by the Queensland Government. Applicable fees are determined by a tender process but, largely because of a degree of exclusivity inferred by TMR, tender prices have been well in excess of \$0.5 million. *Uber operators are not government licensed and pay no fee!*
- Annual government registration, inspection and third party insurance costs for authorised taxi vehicles total almost \$7,000 per year! *Uber drivers pay only the cost of registering and insuring private vehicles.*
- All CTL drivers are required to hold an ABN and be GST registered. They pay their fair share of taxes. *Uber pays no Australian tax and their drivers are not subject to the same strict controls.*

In addition to the above, CTL and taxi owners are subject to numerous and often bureaucratic requests from TMR for information, time consuming government statistical returns, and general compliance activities - *none of which are applicable to Uber or other providers of so called "ride share services"*.

CTL stands by its record of customer service and has no issue with competition as long as the same rules are applied to all the players. If the government is not prepared to ensure that Uber complies with the same rules, then CTL drivers should be similarly exempted. Unfortunately, this would lead to a serious decline in service standards particularly in non CBD areas.

Furthermore, in issuing taxi licences in the past, the government has clearly indicated that all licences will be subject to similar controls and that the ability to offer taxi services will be

restricted to properly licensed persons. In the event that the government should choose to now relax the licensing requirements, we would submit that the government has a moral and ethical responsibility to compensate all the existing taxi owners who were clearly misled when tendering or purchasing their licenses.

A handwritten signature in cursive script, appearing to read 'R Roberts'.

R Roberts
General Manager