


**From:**   
**To:** [Infrastructure, Planning and Natural Resources Committee](#)  
**Subject:** Transport Legislation (Passenger Taxi Services) Amendment Bill 2015  
**Date:** Thursday, 22 October 2015 3:24:03 PM

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To Infrastructure, Planning and Natural resources Committee

## Transport Legislation (Passenger Taxi Services) Amendment Bill 2015

I strongly support The Transport Legislation (Taxi Services) Amendment Bill as the Qld DTRM Compliance does not appear to have a workable strategy to manage the illegal taxi activities. While this situation continues, the value of our investments will continue to plummet.

The NSW Road Maritime and Safety Compliance have been very successful in issuing multiple infringement notices to Uber Drivers, yet the Queensland Government appears to have totally given up. I question the Government's motivation.

Why is a costly review deemed necessary when Suncoast Cabs have proven that the Taxi Industry has all the technology and innovation Uber is offering plus much more?

As for the perception that the taxi industry lacks competition, (ACCC March 2015) (NRMA September 2015)... over 10,000 taxi drivers state wide are competing for every fare 24/7 365 days.

The DTMR heads of Compliance stated during the initial parliamentary hearing carried out by the IPNRC on 14th Oct, they had no prior knowledge of the prospect of a new review and had made no such recommendation to the Minister. Was the setting up of a new review just the Minister's decision? If so, I would then question the Minister's motivation as it appears there has been no industry consultation.

I feel that the review is purely a strategy to pave the way for Uber to enter the market.

The law is being broken, so does that mean we set up a review to allow the law breakers to enter the market? I find this hard to fathom and again question the Governments motivation.

Uber has proven worldwide that they will not operate in a regulatory environment and will continuously flout the law. For example, in parts of Spain, Italy, France and Germany, Uber has been banned from operating for this reason. They continually consider themselves above the law. When considering the disparity below, it would appear that the creation of a level playing field may not be achievable.

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## Legal Taxis

Uber X

New Drivers

All drivers must be a holder of driver's authorisation issued by DTMR

no

Must hold an open licence

no

Must attend a 5 day training course via an approved RTO

8 minute Video

Satisfy Immigration Dept. requirements (foreign drivers)

no

Medical exams

no

Criminal checks

no evidence

Current Drivers

Regular renewal of Drivers Authority (medical exams every 5 years)

no

Display card must be visible to passengers

no

Zero blood alcohol content

no

Attend annual compulsory refresher training

no

GST registered and have an ABN

Pays no GST or tax

Owners and Operators

Compulsory affiliation with DTMR approved Taxi Booking Company

no

Must operate with taxi meters in Contracted Service District

no

Maximum taxi fares as determined by the Government

price surging

Meter tariffs are automated to avoid over charging

no

Vehicles to display taxi decals incl fleet Numbers (visibility)

no

New Compulsory Security cameras to be installed by 2017 at the cost of \$4000.00

no

Compulsory GPS tracking

no

Vehicles to display Operator Accreditation numbers

no

Taxi Service Licence renewed annually

no

Operators Accreditation renewed annually

no

Must adhere to minimum service levels

no

Vehicles subject to age restriction of 6 years and 8 for WAV

10 yrs

Stringent vehicle safety inspections 6 monthly

no

Maintain a current log book detailing ongoing vehicle maintenance

no

Regular Audits by DTMR Compliance on record keeping

no

Raised Fleet numbers affixed to passenger doors for the visually impaired

no

25% of fleet to be dedicated WATs (Wheelchair accessible Taxis)

no

Commercial Vehicle Registration

no

Commercial Vehicle Insurance

no

Maintenance of Fatigue Management Programme (driving hours must be logged)

no

The taxi system automatically logs driver out after 14 hours.

Taxi driver could hop into an Uber car after a 14 hour shift and continue driving

DTRM Dedicated Taxi Compliance units conduct regular roadside checks

no

Complaints procedure in place

no

Uphold DTMR lost property policy

no

## The Necessity of Call Centres

Mandatory 24/7 service is to be provided to all members of the public residing in Contracted Service District.

Call centres monitor taxis via GPS for the safety of both the travelling public and the drivers. Voice communication via two way radios is an added safety feature particularly valuable during down time and natural disasters when all cyber communications are out.

Taxis companies are community minded and an essential service for all members of the

public.

Call centres also manage the dispatch of taxis for the most vulnerable members of the community, for example; the elderly and disabled, Dept. of Veteran Affairs, Domestic Violence Connect, Child Safety and travel to and from school for children with special needs. Also fielding calls from the QPS seeking assistance with crime detection.

A call centre can act immediately to a driver in distress, whereas Uber can only react after the fact.

The Taxi business model is structured to a large degree by the Government's Regulatory Framework for which the government should be responsible and accountable. The safety aspects and tight regulations have been developed over decades by successive State Governments in consultation with the Taxi Industry for the safety and comfort of the traveling public and our drivers. Any removal or lowering of these standards would only be a backward step.

I cannot accept that any politician would allow a multinational organisation with a worldwide record of lawlessness to steamroll its way into this country, expecting the Government to change the laws to suit their business model and to challenge our Australian Taxation Office in court in an attempt to avoid paying Tax.

I urge all Politicians to seriously consider the ramifications of changing any laws to pave the way for Uber X to operate legally, and support the Amendment Bill which will send out a strong message to Uber X drivers flouting the law.

Yours Sincerely

John Babao