


W. T. Simpson



10 April 2017

Committee Secretary  
Public Works and Utilities Committee  
Parliament House  
George Street  
Brisbane Qld 4000

***Re: Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017***

Dear Sir

I am writing to you regarding the proposed changes to this Bill. Below is my submission:

**1. Increase the ride booking annual fee.**

It is proposed that a ride booking service pay an annual fee of \$237 per annum and that Special Purpose Limousine Licences pay an annual fee of \$2480.80.

These two services are essentially the same. Therefore, the ride booking service annual fee and the Special Purpose Limousine Licence annual fee should be the same. Preferably the ride booking service fee should be increased to \$2,480.80 per annum. Otherwise, Special Purpose Limousine Licence annual fee should be reduced to \$237 per annum.

The Special Purpose Limousine Licence is essentially the same as the proposed ride booking licence. However, with these proposed changes, the fees for the new ride booking licence represents less than 10% of the Special Purpose Limousine Licence.

**2. Only L Plate vehicles can Act as Limousine**

People operating a Vehicle displaying an "L" Limousine Licence should be the only party able to advertise and market the services as a Limousine Service, and this should be policed by authorities. If some sort of control needs to be put in place to stop ride booking operators advertising as Limousines (ie Joes Limousine services on a normal private vehicle).

I am a disability pensioner and used the income from my licence to subsidise my Centrelink pension. Three years ago, before ride booking in the form of Uber was allowed to operate illegally, the asset value of my Limousine licence was over \$150,000, and I had a monthly income stream of more than \$500.

If there is no protection to the owners and operators of Limousines, than there is no point having a Limousine Licence. The change in regulation that occurred in September 2016 has seen the asset value of a Limousine Licence destroyed and, as a Licence owner, my income stream has disappeared.

If the Government can't guarantee enforcement of the already existing and proposed regulations for the operation of Limousines, how do they propose to protect the Limousine Licence? If the government is unable to police these regulations, they should cancel the Limousine Licences as previously proposed and pay Licence holders fair value compensation.

### **3. Changes to CTP**

Limousines to remain in CTP Class 4 and ride booking to have their own class of CTP.

Currently ride booking services pay CTP at the same rate as a private vehicle used only for private purposes. As ride booking service vehicles are being used for the purpose of conducting a business, they should pay an increased CTP annual premium and should have a dedicated class of CTP.

With the proposed increase in the number of ride booking licences it would be fair to expect an increase in accident claims based on the massive increase of vehicles operating in this space. This would in turn increase CTP premiums in the new combined CTP Class which would financially disadvantage existing Limousine operators.

Therefore, Limousine Licenced Vehicles should remain in CTP class 4 and a new category be established for ride booking services.

### **4. Regulation of new changes**

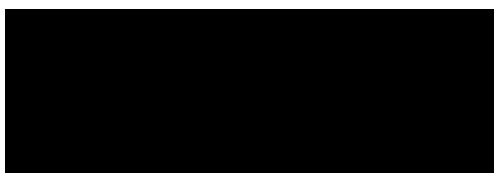
Any new amendments to the regulations will need to be closely monitored.

Recent history seems to indicate that little or no enforcement of regulation was being undertaken. Given the arrival of Uber over two years ago, and that the Uber organization was allowed to continue to operate illegally with little action from the Government is proof of lack of policing.

What provision is being made for enforcing the proposed changes? Will there be inspectors placed at eg the airport to ensure that vehicles are compliant?

Given that the changes proposed are meant to be streamlining the industry and reducing government expenditure in monitoring, I am bewildered as to how many of the proposed changes will result in this expected outcome.

I look forward to your responses.



**Bill Simpson**