

Sound Management Taxi Group

Specialising in taxi investments & driver employment

ACN 062 479 556

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LETTER OF SUBMISSION

To Whom it May Concern

We own and operate a family run Taxi Base at Woolloongabba of 37 taxis for the past 13 years. The industry was stable and well-regulated providing an excellent service to the public. The industry in QLD with all our regulations ran smoothly then came the introduction of Ride Share.

This has impacted us both financially and personally. Our turnover has been reduced by a third but all our costs have remained the same. The industry still has to abide by government regulations which is great to keep the industry providing an excellent service.

We are totally family run myself and wife and our son. It has been an enormous pressure to us all just trying to stay afloat. We have reduced our fleet to 25 from 37 in the past six months.

The impact has affected many not just us, our elderly licence owners, our mechanics, panel beater and not to mention the drivers all of whom have been loyal and long term drivers.

It has had a domino effect on so many small businesses in QLD.

Our son who has a young family is considering going back to his trade, guess he is lucky to have a trade to fall back on, many others do not as the taxi industry is all they have ever done.

I also receive phone calls from licence owners distressed and very concerned about how they are going to manage in the years to come, many in nursing homes and self-funded retirees. Some now turning to Centrelink for a pension as their income has also been reduced by a third. This is an extremely emotion time for us all. Not to mention this is causing more to rely on benefits and adding to the countries debt. All we are asking for is a far and level playing field. We need one independent body to legislate all policies.

A few examples are the amount of Third Party Compulsory insurance a Taxi has to pay compared to Ride Share. We have security cameras and proper GPS in our vehicle all of which have to meet certain requirements. Not to mention the GST and tax that is paid by us, all drivers require an ABN number, Ride Share seem to ignore all this. Then there is the touting and no clear ruling on the pickup areas. All these matters are a quick overview of a unlevelled playing field.

In the years before Ride Share the Taxi Industry was well regulated and this proves to provide an excellent and high standard of service to the public.

As a family owned small business in QLD, we hope some consideration is given to the list of requirements before the industry implodes, causing us to just walk away from a once productive and progressive and viable business.

Yours sincerely

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List of Requirements

1. Establish an independent Personalised Transport Commission with legislative amendment, policing/enforcement, regulatory and policy development capacity.
2. Bailment Agreements must be retained, with the minimum work conditions and standards for all personalised transport drivers enshrined in legislation.
3. Security Camera requirements must establish a minimum standard, be consistent and uniform across all personalised transport providers to ensure the safety of all drivers and passengers (regardless of the service chosen) and to meet Queensland Police requirements.
4. Commercial-grade, anti-tamper GPS units must be fixed to all personalised transport vehicles and be remotely accessible to authorised parties.
5. All personalised transport vehicles to have emergency systems in place to support driver safety.
6. The Bill and Regulation must be fully consistent with all other relevant legislation including, but not limited to, disability discrimination and work, health and safety.
7. All personalised transport vehicles be required to have dedicated number plates (akin to "T" plates), rather than easily removable stickers. Plates to be provided only when evidence of appropriate CTP, public liability and certificate of inspection are provided.
8. Immediately define, and establish appropriate and equitable premiums for, the class/classes of Compulsory Third Party insurance for all personalised transport providers to address continued uncertainty.
9. All personalised transport providers must hold public liability insurance to prevent the State Government becoming the default insurer and to minimise potential risks to the community.
10. In the absence of vehicle age restrictions, establish clear vehicle quality and usage rate standards and hold operators accountable.
11. Increase licence fees for Booked Hire Service Drivers and Authorised Entities to help fund expected increases in regulatory and enforcement costs for Government and to better reflect the level of "trust" being placed on licence holders.
12. All drivers must have an ABN and be registered for GST before receiving a Drivers Authorisation.
13. The Government must establish a process for managing the risks of multiple affiliations by drivers in terms of both "chain of responsibility" and fatigue management. This includes drivers operating across both personalised transport and other transport (i.e. truck, bus) sectors.
14. Fully integrate taxis into the GoCard public transport network in the short-term.
15. Clearly define what constitutes a "hail" and "touting".
16. Expressly prohibit the establishment and operation of Booked Hire Service pick up/and drop off zones, on public and private land, which represent pseudo taxi ranks.
17. Establish and maintain a register of drivers that have been disaffiliated or removed from platforms to prevent drivers from simply shifting to a new platform.
18. Establish clear and enforceable requirements for Government access to all data related to the delivery of personalised transport services in Queensland.
19. Expressly identify Police Check requirements in the Bill for all personalised transport drivers as part of Driver Authorization approval.
20. Maintain the capacity of the Minister to enter into Service Contracts at their discretion to ensure the Government has the capacity to respond quickly, and at the lowest cost, to changing or unique circumstances without the need for regulatory or legislative changes.