

**From:** [REDACTED]  
**To:** [Public Works and Utilities Committee](#)  
**Subject:** Stakeholder Submission (re 170323) Transport & Other Legislation (Personalised Transport Reform)  
Amendment Bill 2017  
**Date:** Sunday, 9 April 2017 8:31:25 AM  
**Attachments:** [List of Requirements.pdf](#)  
[ATT00001.txt](#)

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9 April 2017

Research Director  
Transportation & Utilities Committee

Dear Sir/Madam

I present this submission in response to your invitation for Stakeholders to do so.

I have owned a Brisbane Taxi Licence continuously since the 1980's. It is currently leased to Black & White Cabs, Brisbane. My wife and I rely on the monthly income to support us in retirement. Initially, when I entered the Industry, I operated a licence myself. As a self employed person, Superannuation was not widely considered in those days, as I am sure you would be aware. Consequently, I subsequently took the decision to retain a Licence for the long term, so that I would be financially secure in retirement. This decision was not taken lightly. I believed that, as Public Transport was controlled & regulated by the State Govt., this was a safe, wise decision.

The Licence, that I ultimately retained, has always been operated within the Legislative guidelines determined by the Qld. Govt., with all Regulations strictly adhered to.

The introduction of Ride Sharing into the Industry has not simply introduced a Competitor operating under the same Regulations, & with the same Safety & Security measures in place, as are required of a Traditional Taxi. Ride Sharing is being offered unfair advantages in both regulation & operating costs.

Competition is to be applauded as it results in better services for the public. BUT to allow Ride Sharing to operate on a DIFFERENT Playing Field is UNSAFE, UNFAIR & will result in a substantial loss of Transport Standards in Qld.

Because the Playing Field is currently NOT level, the leasee of my licence has NOT been able to sustain the lease payments to me. Consequently, I now have a reduction of \$450 per week in my retirement income. You will appreciate that this is devastating for myself & my wife!

I have read the Draft Copy of TCQ's proposed submission to you & I absolutely support its content in full. Attached is a copy of TCQ's Summary of the changes required for the Legislation Amendment Bill to be supported by the Qld Taxi Industry.

I agree totally with this Summary & ask that you record my decision to do so.

Yours faithfully  
Allan Taylor. [REDACTED]

## **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.