

From: [REDACTED]
To: [Public Works and Utilities Committee](#)
Subject: Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017 Submissions
Date: Monday, 10 April 2017 4:08:33 PM
Attachments: [REDACTED]
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Good afternoon,

Please find attached my submission in regards to the Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017

Regards

Angela Rheeders | General Manager
Townsville Taxis / Standard White Cabs Limited

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Transport and other Legislation (Personalised Transport Reform) Amendment Bill 2017 SUBMISSION

Townsville Taxis

Thank you for the opportunity to provide this submission to the Parliamentary Committee investigating the Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017 and Transport and Other Legislation (Personalised Transport Reform) Amendment Regulation 2017 tabled in Queensland Parliament on 21 March 2017.

We are a local booking company in Townsville who employs local people to ensure that the dispatch of taxi bookings is done with accuracy and efficiency. We not only achieve our minimum service levels as required by Department of Main Roads, Queensland (DTMR), we consistently exceed their expectations.

The achievement of these results is not done by chance, but by constantly reviewing areas for improvement, and has developed a culture for continuous improvement. We ensure that our processes and procedures are actively enforced by all employees and sub-contractors. Every decision is based on the legislative requirements of the Queensland Transport Operations (Passenger Transport) Act of 1994.

Our main focus always is, and always be – Safe and Reliable Customer Service

Ridebooking does not assist with the high unemployment rate that Queensland, in particular Townsville is experiencing, in fact it does the exact opposite. The business model and pricing structure is unsustainable to ensure an effective, safe and reliable transport service

Our fleet consists of 135 licenced taxis, this number has always been determined by the data supplied to the Department of Main Roads & Transport to enable decision to be made on serving the demand without an oversupply to the market. As there is no limit to the number of ridebooking services in any area, there is absolutely nothing to prevent an oversupply resulting in financial losses being incurred, by the driver in particular. The uncapped number of vehicles allowed to enter the ridebooking market will result in increased expense on the road infrastructure as well as further increasing pollution emissions. We pride ourselves on having about 76% of our fleet being hybrid vehicles, thereby reducing our carbon footprint.

With the oversupply in the market will see drivers experiencing extreme fatigue as they compete in an exhausted market. This will be almost impossible to police should a driver be able to driver for several platforms without any regulation or restriction.

Townsville Taxis fully supports the List of Requirements that Taxi Council of Queensland have put forward to ensure that the market needs are met with flexibility and regulations being implement where necessary.

The Taxi Council of Queensland understands the needs of the everyday Queenslander.

Regards,

Angela Rheeders

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.