



9 April 2017

Research Director
Public Works and Utilities Committee
Parliament House
George Street
BRISBANE QLD 4000

Email: PWUC@parliament.qld.gov.au

Dear Sir / Madam

I write in relation to the proposed amendments to the Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017.

I purchased my taxi licence in 1986 partly as an investment with a view to selling it to add to my retirement funds but due to the introduction of Uber as a legitimate business in unfair competition this now seems unlikely. As a result my wife and I will need to rely on a government pension to fund our retirement due to a compensation payment of only \$20,000 versus a potential sale of over \$300,000 before Uber was legalised in Queensland.

In recent years my wife has survived ovarian cancer and I prostate cancer, a significant burden on our retirement finances.

I, and thousands of other drivers have followed the relevant legislation regarding industry regulations and taxation while developing a respected industry over decades. The introduction of unregulated competition has the potential to damage this reputation and allow unlicensed operators to evade government revenue.

Uber and the taxi industry should be on even terms to ensure a competitive industry and the safety of all drivers and passengers, as such I respectfully add this list of requirements to be considered in with the introduction of this legislation:

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.

Yours faithfully

ALAN ROBINSON
Taxi Proprietor