



10 April 2017

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

Dear Sir/Madam,

**RE: *TRANSPORT and OTHER LEGISLATION (Personalised Transport Reform) AMENDMENT BILL 2017***

In giving consideration to the *Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017*, I would like to provide personal submission on behalf of Lintre Pty Ltd.

This submission is made in addition to the submission by the Limousine Action Group (QLD), to which I am a member and to which the group also speaks on my/my Companies behalf.

**Recommendation 1 - Only L Plate vehicles can Act and Look Like a Limousine**

For a number of years, a small percentage of limousine operators have been circumventing the cost of licensing by registering limousines as buses under a "Q" number. Vehicles registered accordingly typically undercut licensed limousines because licensed limousines cannot compete with the additional cost of owning or leasing licenses.

It should be noted, consumers do not care if limousines are licensed and, so long as an equivalent experience is provided, consumers are typically are unaware any difference(s) exist.

Likewise, when entering an event, traffic controllers show their lack of misunderstanding by allowing all vehicles that look and act like limousines access into privileged areas otherwise only accessible to licensed vehicles.

In 2009, I paid \$125,000 for the privilege of owning a limousine license. This was meant to be an investment for my family; however, if ride booking services, and other vehicles, are allowed to continue "looking and acting" like limousines, then the value of my license becomes nothing more than the value of the annual ride booking fee (i.e. \$237.00).

I trust this basic comparison of values might help you to begin to appreciate how much stress the reform is causing me, my family, and other limousine license owners.

**Recommendation 2 – Increase the ride booking annual fee.**

A precedent has been set with the Special Purpose Limousine Licence annual fee of \$2480.80. Vehicles operating under a Special Purpose Limousine License provide essentially the same service(s) as those operating as a ride booking service; however, the proposed annual fee (\$237.00) for a ride booking service is less than 10% of the Special Purpose Limousine Licence.

To allow ride booking services to operate under an annual fee of \$237.00 will effectively phase out Special Purpose Limousine Licenses, and contribute heavily towards the continued diminishment of limousine licenses.

As previously mentioned above, I paid \$125,000 for a limousine license. Whilst this license has been made “worthless” by the current reform, it’s value can only be partially restored by demanding an appropriate fee from ride booking services wishing to participate in the personalised transport industry.

**Recommendation 3 - Limousines to remain in CTP class 4 and ride booking to have their own class of CTP**

Established limousine operators have a strict policies and procedures in place to mitigate risk. It is unlikely that any individual operating a ride booking service will have any risk mitigation measures in place, let alone any measures that could compare with those in place by existing limousine operators.

Given that the insurance market is guided by its risk exposure, it would be hugely unfair to allow ride booking services to operate under the same insurance class as limousines.

I thank you for taking the time to review my submission, and I trust the recommendations provided above will receive your further consideration.

Should you wish to clarify any of the points I have raised, or if you have any questions or queries about my submission, I can be contacted on 0457 776 208.

Yours faithfully,



Trevor Francis  
Director, Lintre Pty Ltd