

Wade and Helena Juppenlatz



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

10 April 2017

Dear Sir/Madam

RE: SUBMISSION TO THE TRANSPORT AND OTHER LEGISLATION (PERSONALISED TRANSPORT  
REFORM) AMENDMENT BILL 2017

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. This submission is an account of the effect of these changes on my personal situation and why I support the Taxi Council Queensland (TCQ) requirements.

I have been around taxis for around 30 years, as a family run business I grew up managing and maintaining taxi's. I finally got to a point where I was able to invest in a taxi license 3.5 years ago, purchasing a license just moments before illegal personalised transport operations began appearing in Queensland. Although I have not been an operator for long, my experience both in the taxi industry and the technology industry gives me a broad perspective on the situation.

I refer to the TCQ's submission on this bill as it articulates the feeling of almost all taxi license holders I know and is certainly in line with my view of the current proposal. We find it unbelievable that the current government has dismantled regulation around a service that was proven safe and reliable to open the market and allow exploitation of all Queenslanders involved in personalised transport services (PTS). Inexperienced service operators are open to exploitation by large, faceless organisations – bound to contracts that do not protect their interests. Customers are open to exploitation due to ineffective safety measures, insurance cover and predatory pricing. Traditional taxi operators are exploited as the laws around safety and regulatory operational costs (CTP and comprehensive insurance) apply only to their business - while the market is cannibalised by unfair competition.

Add to this the detrimental effect this has on the traditional, legitimate taxi services that Queenslanders rely on 24x7x365. While there are no barriers to entry in the PTS market, traditional operators are finding it harder to staff vehicles during quiet times, meaning long wait times (or eventually predatory pricing) will become normal for those not living in densely populated, high socio economic areas. This further discriminates against ordinary Queenslanders by removing income from working families and shifting affordable Personal Transport away from those who need it most.

I can speak personally that my family and I have suffered hardship due to the government's inability to uphold the states laws in the first instance and the poorly thought out and implemented legislation changes that ensued. Most recently, we have been forced to sell houses and host the entire family under the same roof. My father, at 73, is seriously contemplating living in a caravan as he cannot see that he will now ever be able to afford a house in Brisbane. This has been a major stress on my entire family and I, with a school age child we face the possibility of losing the family support we rely on in Brisbane.

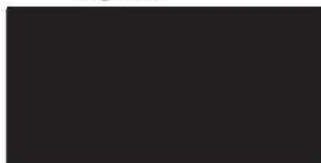
While I agree that we cannot stifle innovation in the personalised transport industry, to pass legislation that is directly responsible for redirecting income opportunity away from hard working, law abiding Queenslanders is not something that any Queensland business person should support. In many cases, with what is being called the "digital revolution", the best outcomes are those that take traditional industry experience and accelerate or improve service with technology. We feel that this committee has the opportunity to get the Queensland personalised transport industry back on that proven track and back to being a world leading service framework. This framework will require the necessary boundaries laws and authorities to protect the interests of Queenslanders above all.

I have attached the list of requirements the TCQ has prepared, we support this list of requirements as representing a fairly and logical foundation for personalised transport services in Queensland.

Please do not hesitate to contact me should you have any questions regarding this submission.

Thank you.

Regards,



Wade Juppenlatz



### 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.

**Taxi Council Queensland Inc. ABN 94 004 988 707**

**T** (+61) 7 3434 2100    **F** (+61) 7 3394 4395    **E** info@tcq.org.au    **W** www.tcq.org.au