

## **Wodonga Taxis Ltd**

To the Economy and Infrastructure Committee Submission re the Multi-Purpose Taxi program.

### **Introduction.**

**This submission seeks to identify the value proposition of Victoria's UNDER THREAT Multi-Purpose Taxi Program.**

This submission is framed against the committee criteria listed below:

- Minimum Safety requirements for vehicles operating within the MPTP Scheme.
- Mandatory maximum fare rate across all MPTP work
- How to prevent the roting of vulnerable users
- The financial impacts to services within the broader disability sector
- Pathways for the industry to absorb major change post COVID19
- Impact of expansion of the MPTP

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### **1. The Minimum Safety requirements for vehicles operating within the MPTP Scheme**

It should be a given that all CPVV registered vehicles and rideshare operators seeking authorisation to provide MPTP services should feature the following:

**Recognition and resolution of vehicle booking capability for the visually impaired/legally blind and fully blind.**

People with these disabilities face differing service provision challenges eg:

- Making a one off, or multiple service provider booking
- Only able to make a Booking with the assistance of significant others
- Have basic telephone services only. ie do not have/unable to use a smart phone
- Unable to use a computer.
- Choose not to have, or are unable to use voice recognition technological resources.
- Unable to undertake self-initiated Q code registration
- To use UBER services customers must have a smart phone to make a booking and set up an UBER account – non -smart phone users are disadvantaged

### **Carriage of Assistance Animals**

- Any person who has a legitimately authorised assistance animal can by law, have the animal carried in a taxi. The same ruling applies to rideshare services, yet media reports suggest that within rideshare services, selectivity can be applied with some drivers refusing to have such animals in their vehicles.

### **Vehicle entry and exit for visual impairment or blindness.**

- Set Fares – with no capability for surging. All fares should be processed for payment via a trackable metered system with account only payments.
- To exit the vehicle, all passengers should be assisted from the vehicle onto the footpath and if requested, informed, or if acceptable to the passenger be turned by the driver to the required direction.

### **In vehicle cameras for MPTP passenger safety**

- Cameras should be mandatory in all vehicles that service vulnerable MPTP services users.
- Many MPTP card service users are intellectually or physically disadvantaged and may not recognise or be able resist inappropriate driver behaviour.
- Elderly and frail passengers could be subjected to intimidating behaviours causing them to become apprehensive and fearful.
- Operational cameras enable access to real in-time situations that negate any he said/she said, he did/she did situations.

### **Wheelchair capability**

- These vehicles should meet the same fit out of standards expected of Wheelchair taxi operators eg. Toyota Hi Ace or Kia Carnival sedan with each fitted with approved wheelchair access and entry facilities eg hoist or ramp
- Any new entry service with WAT vehicles with hydraulic hoists should be routinely inspected as per CPVV regulations
- All Drivers of these vehicles should have the same training and accreditation as WAT Taxi Drivers
- If because of vehicle costs, Uber is disinclined to offer any wheelchair services and only offer carriage to ambulatory disabled passengers with MPTP cards, other vulnerable people are unfairly disadvantaged by being unable to access the Uber service. 'Cherry picking' of MPTP taxi services by a company that is on record as not being a taxi service is unethical immoral and should be unacceptable to the committee and the government.

## 2. Mandatory maximum fare rate across all MPTP work

This response challenges the committee to recognise the financial danger to the government of potential blowout of MPTP funding from systemic rorting

- It should be mandatory that there be fare ceiling for all MPTP trips – for which the subsidy amount can be based. **Failure to do this will see surge pricing and dramatically increase the subsidy costs of, and to the government.**
- It is critical that all vehicles processing MPTP journeys must be equipped with Cabcharge Eftpos terminals as are taxis.  
This recommendation is founded on the facts of current and well proven equitable services offered by the taxi industry.
- The committee should understand that should any form of fraud occur that the current BSP services of Taxis are readily contactable by the CPVV if information is required in these circumstances. A like checking system is not widely available with UBER.

## 3. How to prevent the rorting of vulnerable users

- Without the mandatory cameras and GPS tracking many MPTP and vulnerable customers could be more vulnerable to fare rorting and inappropriate driver behaviour and any driver inclined to bad behaviour would be aware of the lack of evidence of their actions.
- For these high risk disadvantaged customers every measure should be taken to ensure their safety and well-being.

## 4. The financial impacts to services within the broader disability sector

- UBER enabling of MPTP services impacts MPTP services users, as they currently face higher costs from price surging in busy/high demand periods. How is this fair to vulnerable users with limited incomes?
- The sharing of the MPTP program with UBER is seeing and will continue to see current Taxis services and operators of WAT vehicles facing significant financial duress from reduced occupancy and increasingly further limited work opportunity.  
This change is making it even more difficult for a WAT operator to maintain the \$80,000.00 vehicle. To this end why would a current operator stay in the taxi industry? In turn this will also mean much less interest by future would be WAT operators

## 5. Pathways for the industry to absorb major change post COVID 19

1. A major pathway and best start would be for the CPVV to get serious about their capabilities to assist the taxi and hire care industry to absorb the major changes imposed by the government with full authority carried by the CPVV.

The arrival of Covid 19, the introduction of Job Keeper, the varying lockdowns, the border closures, the many business failures, and collapses, have all impacted on the taxi industry.

The evolving covid changes now see every Taxi network in Victoria needing drivers and according to communication with the CPVV, a very minimal no of CPVV staff are facing some 1400 permit applications with each, needing 6 weeks to be processed.

This means that at this moment in time approximately 1400 people are looking for an entry level job and it should be understood that in the very long wait time, they cannot be put in a taxi for in-situ training as they are not in possession of their authority cards and documentation.

Consequently because of the long wait, many would be drivers simply lose interest and walk because of this unreasonable delay.

Yet, just recently the CPVV was able to add an additional 60 Compliance officers to be employed to check and report on driver covid regulations performance.

**It is widely understood within the taxi industry that a significant part of the CPVV operational criteria is to put vehicles and drivers on the road! Why is the permit process so low on the CPVV executive priority list? Why can't extra staff be appointed to speed up the permit processing? Why can't a temporary permit be issued to enable a faster start-up in the form of on-job training prior to receipt of CPVV Driver Certification.**

**Why is the accreditation process different for Uber drivers?**

2. A second pathway is recognition and acknowledgement of the unintended consequences of the taxi industry reforms.

To achieve economic sustainability for point-to-point transport services the government through the Essential Services authority must review its notions of fare structures and revisit set fares, which prevails on all other forms of public transport and has full and ongoing consumer acceptance.

Can the committee review the role of the Essential Services Commission and the necessity for that agency to set Metropolitan Taxi Fares?

In regional Victoria where opportunity for fare setting is in place, in many ways it is a nightmare as so many customers simply go for the cheapest options which is a race to the bottom for an industry without any elastic demand.

Fare haggling has become and continues to be, a destructive contributor to reduced taxi industry income.

3. The excessive number of registered taxi and ride share service vehicles should be reduced. The ratio of passengers to point to point services vehicles is a significant indicator of economic imbalance for the industry.

In regional Victoria the general community has a strong expectation and demand that Taxis operators provide a 24/7 service in lieu of the lack or other transport options. This service provision beyond Friday and Saturday nights has a significant impact on operator returns.

4. The government's revoking of taxi Licences with no compensation created significant financial hardship to many taxi operators who for entry into taxi services business, paid large sums of money for the government regulated and controlled tradable licences. MORALLY the government has an obligation to redress wrongs and disadvantage generated by any government mandated industry changes.

The significant economic losses incurred by so many licence holders was given token recognition by the government via the measly transition payments to supposedly help taxi businesses to adjust to the ever-increasing tough times and diminishing returns, and this insultingly low adjustment payment was added to via the subsequent very unfair and inequitable Fairness fund that many were deemed ineligible for.

The committee is no doubt aware that other like licence holders of other Victorian industries have been compensated yet the taxi industry has been denied this justice Why is it so?

5. To address a revenue return on the transition and unfair fairness payments the government imposed a badly administered new tax in the form of a Levy which has not and will never realise the anticipated financial return in the projected time frame.

The taxi industry recognises that the levy is here to stay. The levy should be restructured from the near disaster it has been from the outset and with nominal amendment and stricter administration become the platform to enable just compensation to the disadvantaged licence holders and also enable would be leavers to step away from the industry, reduce the number of operators and actively contribute to the re-development of a sustainable industry.

6. As a long-standing regional taxi service BSP and owner operator, I ask that the committee give serious thought to the fact that that all point-to-point trips and journeys are based on the customers' needs NOT WANTS! eg they need to go to the Doctor, they need a ride home from the pub. NO ONE WANTS A TAXI as a demand driven want. Therefore, 'economics 101' tells you that the market value of all taxi rides will not change with more service providers. Yet the government through its mostly misguided reforms created an unsustainable entry surge.
7. Could the committee note and reflect on the fact that UBER has from its arrival to Victoria indeed the whole of Australia, insisted the company is not a taxis service yet this non-taxi service company constantly demands of the government all the benefits of taxi operator business without the high value costs of taxi services provision.

**WHY is this manipulative business positioning allowed?**

**WHY is the CPVV so supportive of Uber ahead of other would be rideshare service providers?**

**WHY has the CPVV given Uber priority above other rideshare operators to offer 'cherry picked' (limited), MPTP services**

The CEO of the CPVV enabled UBER to enter the MPTP via a 'shonky' service trial with laughable metrics, this enablement offered preferential ie what works best for UBER only. This decision making by the CEO on the behest of the CPVV actively demonstrates corrupt business behaviour.

#### **Impact of expansion of the MPTP**

- Disadvantaged/Disabled customers will become even more vulnerable
- Without strict fares controls rorting and Uber price surging will become embedded and the government's subsidy costs will spiral
- Many of the disabled/elderly/ MPTP users do not have, and do not use Smart phones. – essential for Uber accounts and services.
- How will single credit card entry accounts for expanded MPTP services not be rorted by user families or friends?
- The struggling taxi industry will, because of poor government decisions for its taxi industry reforms see an industry facing even tougher conditions and circumstances with relevant service delivery reductions.
- The decision to enable Uber to enter the MPTP market with no services amendments threatens the government (taxpayers), with increased costs and budgetary blowout. In your considerations of this situation could the committee please explore exactly WHY this seemingly unchecked decision was allowed?

In summary, I want to thank the committee for hearing the concerns of Wodonga Taxis Ltd regarding the expansion of the MPTP program and like to think that appropriate responses will be enacted

Yours sincerely



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