

## Inquiry into the Multi Purpose Tax Program

Mr Samuel Samuel

**Organisation Name:**A2B Australia

**Your position or role:** Head of Public Affairs

### YOUR SUBMISSION

**Submission:**

I have uploaded A2B's submission

### FILE ATTACHMENTS

**File1:** [610cb1b65902e-MPTP submission August 2021 \(003\).pdf](#)

**File2:**

**File3:**

**Confidentiality:**

**Signature:**

David Samuel

## **MPTP Submission**

### **Intro**

The Economy and Infrastructure Committee has been required to consider and report on the safety standards for members of the public that travel on the Multi-Purpose Taxi Program (**MPTP**) (**Inquiry**).

A2B Australia Limited (**A2B**) is committed to ensuring Victorians who live with a disability have access to the best and most equitable commercial passenger vehicle services and welcomes the opportunity to provide a submission to the Inquiry.

A2B's submission is written in the context of recent changes to the MPTP where rideshare providers have been approved to undertake MPTP work.

A2B's submission's focuses on the need to ensure the viability of the MPTP, maintain the minimum safety standards for MPTP vehicles and minimise the financial impact on both MPTP users as well and WAT Operators (the only segment of the personal transport sector that safely and effectively provide services to those Victorians who use wheelchairs). The submission is broken up into three key issues that should be the focus of the Committee's considerations.

1. Ensuring that both the MPTP (and the WAT fleet that helps support it) remain viable and able to meet the needs of the community who rely on the services they enable.
2. Ensuring safety standards are maintained and apply equally to different businesses and business models that are permitted to conduct MPTP trips and transactions.
3. Ensuring that fares are regulated for MPTP participants, WAT Drivers and WAT Operators.

To address these three key issues, A2B has three simple recommendations:

1. Review the approval process to increase equity, efficiency and transparency.
2. Apply safety and price-setting regulations to ride share.
3. Provide additional assistance for WAT Drivers and vehicle owners.

### **About A2B**

A2B Australia Limited is an Australian Company founded in 1976 and listed on the ASX. We have 900 office staff, primarily in technology and contact centres, and 40,000 affiliated Taxi Drivers. We develop world-class technologies that are used by clients such as Woolworths

and Australia Post and technologies that are exported to USA, Canada, United Kingdom, Denmark, Finland and Sweden.

Our businesses include Cabcharge, 13cabs, Maxi Taxi, EFT Solutions and Mobile Technologies International. In support of Professional Drivers and their Passengers, we provide class-leading and cutting-edge technology to 96% of Australia's 22,000 Taxis. Our 13cabs Taxi network is the largest in Australia.

13cabs is proud to be the largest provider of Wheelchair Accessible Taxi services in Victoria and 13cabs' Taxi Drivers provide a universal service available to all Victorian citizens, regardless of how they wish to book, ride or pay and regardless of a Passenger's access to smartphones and credit cards.

Cabcharge, our payment processing business has been responsible for the non-exclusive processing of in-of MPTP payments for over 30 years and is an expert in in-Taxi payment facilities.

## **1. Ensuring that both the MPTP (and the WAT fleet that helps support it) remain viable and able to meet the needs of the community who rely on the services they enable**

In 2017 legislation was passed that reformed the Commercial Passenger Vehicle (**CPV**) market to take into account structural changes, in particular to include rideshare vehicles (**2017 Regulatory Reform**).

The entry of rideshare meant there was increased competition which allowed for the market to function more efficiently. While A2B welcomes competition and the introduction of new and businesses that serve Victorians, this should not be done at the expense of vulnerable Victorians. MPTP is critical to those Victorians living with a disability - not just in Melbourne, but right across Victoria.

Wheelchair Accessible Taxis (**WAT**) face significant challenges to ensure their essential service remains viable. WAT Drivers face much higher opportunity and commercial costs than standard CPVs. Diluting the pool of work WATs have access to via the MPTP is likely to result in less WAT vehicles on the road as their ability to remain viable is at risk.

Either WATs need to be given priority access to MPTP work or the businesses need to receive direct assistance from Government. Without this support, we expect to see a significant and unsustainable drop in the number of WAT services over the next decade. This would bring with it a significant decline in the standard of the transport services available to vulnerable Victorians.

## **2. Ensuring safety standards are maintained and apply equally to different businesses and business models that are permitted to conduct MPTP trips and transactions**

There are well established regulatory requirements that have been imposed for decades on the Taxi industry when undertaking MPTP and WAT work.

13cabs has always complied with, and their affiliated Taxis have always provided their services in compliance with, Victoria's safety and consumer protections.

The 2017 Regulatory Reform did not impose these same regulatory requirements on new rideshare operators performing the same work. This is of particular concern now that rideshare providers have been approved to conduct MPTP work and should therefore be one of the focuses of the Inquiry.

Of the regulatory requirements that are imposed on Taxis but not rideshare, the main areas of concern include:

- **Tactile signs under door handles.** Tactile signs under door handles are a reproduction of the vehicle's registration number and are a critical safety feature to ensure that people with a vision impairment are getting into the right vehicle. This requirement should apply equally across the board as they are a practical and sensible way to ensure those living with a vision impairment can safely access the MPTP.
- **Driver training.** To drive a WAT, Taxi Drivers are required to undertake specific training to receive a 'W endorsement' enabling those Drivers to transport people in wheelchairs. WAT training includes teaching Drivers how to load a wheelchair into the vehicle safely, how to restrain it properly and what wheelchairs can be transported and how. It is equally important for rideshare drivers to also receive a 'W endorsement' ensuring the safety of all MPTP users.
- **Cameras.** As with all Taxis, WATs are also required to have cameras installed. These are particularly crucial when it comes to transporting vulnerable Victorians. Cameras assist in overcoming communication difficulties that vulnerable people may have and instill a sense of comfort if there is an incident. They also are a deterrent in preventing things going wrong. In order to do MPTP work any vehicle (including rideshare) should be required to have an approved camera fitted.

A2B is of the view that all existing regulations (including those listed above) are appropriate, not particularly onerous and act to protect Victorians who are living with a disability. If rideshare is to remain provide a service to this segment of the Victorian community it must be required to comply with these regulations.

## **3. Ensuring that fares are regulated for MPTP participants WAT Drivers and WAT Operators.**

Rideshare fares are unregulated and rideshare providers are notorious for discriminatory pricing and surge pricing. This is unsustainable and will not work in the context of the MPTP. In order for the MPTP to continue it is imperative that all MPTP trips no matter whether they are provided in a Taxi or rideshare vehicle are regulated.

Members need assurances they are paying a fair and reasonable price and the MPTP budget should not be compromised by practices like discriminatory pricing and surge pricing.

Furthermore consideration needs to be given to the way in which rideshare providers remit the fare to the Driver. It is widely known that rideshare providers do not remit the full fare to the drivers. As mentioned above, providing WAT services come at a higher commercial and opportunity cost when compared to regular rideshare or taxi services. If drivers who provide WAT services are not remunerated appropriately there is very little incentive for them to adhere to the safety requirements and provide the high standard of service required for the MPTP and vulnerable Victorians.

## **Conclusion**

A2B remains committed to the long-term success of MPTP. We are also proud of the part we play in helping to ensure MPTP members receive the best and most equitable service and share in the benefits that flow from our company's investment in new technologies and approaches to personalised transport.

While we support and encourage change, we also urge the Committee to carefully consider the needs and dynamics of this unique and vital market. A balance must be struck between the benefits that flow from increasing the number of participants in personal transport and ensuring the safety, equity and suitability of the service.

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