

# Discussion paper

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Review of Compulsory Third Party (CTP)  
motor vehicle insurance for point-to-point  
transport vehicles

Have your say



**SIRA**  
State Insurance  
Regulatory Authority

# Background

## What is CTP Insurance?

People injured in motor vehicle accidents often require support to cover medical and rehabilitation costs, suffer financial losses as a result of time off work and, in some cases, face a reduction in future earning capacity.

Compulsory Third Party (CTP) or Green Slip insurance is a mandatory insurance product required in order to register a vehicle in NSW. It protects the owner from being personally sued for any injuries their vehicle causes to passengers, the drivers and passengers of other vehicles, pedestrians and cyclists, who can make a claim on the vehicle owner's insurer to receive the support they need as a result of injuries incurred. It also provides some benefits irrespective of fault, such as lifetime care and support for those who are severely injured, public hospital and ambulance services, and up to \$5000 for treatment expenses and lost earnings.

Since 1989 the NSW CTP scheme has been provided by private insurance companies which are licensed and overseen by the State Insurance Regulatory Authority (SIRA). At present, the vehicle owner must buy their insurance from one of six licensed insurers.

Green Slip prices are set independently by these insurers having regard to the likely costs of claims and the associated costs of delivery. They determine different pricing strategies, depending on their particular business strategy.

Under the current Green Slip system, vehicles are grouped into classes. Taxis and hire cars are insured as separate classes of vehicle, while ride-share<sup>1</sup> type services are, for the most part, included in the general pool of passenger vehicles.

<sup>1</sup> Ride-sharing in this context refers to services provided by people using their own cars for a fare which are enabled by smartphone apps to connect the passenger and the driver.

## The main issue to be addressed in this Discussion Paper

Taxis, hire cars and ride-share services are all part of the 'point-to-point' transport market. Although they each have different operating models, they commonly provide services that involve the passenger determining the start and finish points of the journey (known as point-to-point). To some degree these different types of point-to-point services compete for the market.

Ride-share services have become particularly prevalent in recent years with the emergence of smart technologies. UberX is the most well-known example, but there are others including GoCar and Lyft. Typically, a ride-share driver will use their own car to provide ride-share services. While some drivers may use their car mostly for ride-share, often they will use it for other purposes too. Ride-share services were previously unregulated and are often indistinguishable from the rest of the general pool of passenger vehicles. They are not specifically identified to the Roads and Maritime Services (RMS) or the CTP insurers as ride-sharing vehicles.

The traditional notion that a vehicle is either principally for business use or principally for private use is increasingly blurred. By contrast, taxi and hire car operators are highly regulated and more easily identifiable. They are required to be identified to RMS for registration and CTP insurance purposes and are paying the total insurance cost of their respective vehicle classes.

The capacity of passenger vehicles, registered for private use, to be used for ride-sharing introduces new risk factors when insurers are working out CTP prices. It also challenges the traditional way in which vehicles have been formally classified and regulated as taxis, hire cars or private passenger vehicles and highlights a need to find ways of allowing insurers to better set prices based on individual usage and risk so that pricing is fair and equitable across the point-to-point market.

## Recent reviews in NSW – implications for CTP insurance

In 2015 the NSW Government initiated an independent taskforce to examine the future sustainability of taxis, hire cars and other emerging point-to-point transport providers in NSW.

In December 2015, in response to the report of the Point-to-Point Transport Taskforce, the Government introduced changes to the regulation of taxis, hire cars and ride-sharing services to provide more opportunities for all drivers and stronger safety mechanisms, as well as better competition and choice for customers. In particular, ride-share services have been legalised.

In recognition of the more flexible use of vehicles across the current vehicle classifications, the Taskforce made a number of recommendations in relation to insurance for point-to-point transport, including a review of the framework for establishing CTP motor vehicle insurance coverage for point-to-point vehicles and consideration of a system that better rewards safer behaviours, irrespective of the vehicle type. In summary, the Taskforce was of a view that vehicles should pay according to individual risk, irrespective of the class of vehicle, so that there was greater equity across the different types of point-to-point providers.

### Independent review of insurer profit

A recent independent review of insurer profit and competition within the NSW CTP market made recommendations to reduce the regulation of premiums – particularly commercial use vehicles – and to develop more transparent mechanisms such as risk pools to deal directly with the issue of premium affordability. The *Report of the Independent Review of Insurer Profit within the NSW Compulsory Third Party Scheme* (October 2015) is available at [sira.nsw.gov.au/CTP-reforms](http://sira.nsw.gov.au/CTP-reforms).

### CTP Premium System Review

SIRA in response is currently undertaking a review of its premium rating system, focused on increasing competition in the CTP insurance market, including examination of cross subsidies in the scheme and risk factors used to set premiums. The primary aim is to allow insurers to innovate in underwriting, and to shift further towards risk based pricing, but to do so within a scheme which retains strong consumer protections.

## CTP scheme review

The NSW Government recently announced a comprehensive review of the scheme. The review is centred around achieving four key objectives for reform:

- increase the proportion of benefits provided to the most seriously injured road users
- reduce the time it takes to resolve a claim
- reduce opportunities for claims fraud and exaggeration
- reduce the cost of Green Slip premiums.

A broad consultation process will be undertaken and an options paper will be released for public comment.

The outcomes of all of these reviews will provide input into the CTP scheme review.

### Objectives

The purpose of this paper is to:

- consider the perceived disparity between the rules and prices associated with different classes of point-to-point transport vehicles.
- explore a more flexible approach to vehicle classifications and premium regulations which rewards safer drivers, and more accurately reflects the risks associated with different uses of vehicles operating in the point-to-point market.
- ensure to the maximum extent possible, that operators in the point-to-point market face consistent and fair approaches to premium setting.

# Current arrangements for point-to-point transport vehicles

## The Green Slip price setting process

The cost of a base level CTP insurance premium (Class 1 passenger vehicle in the Sydney metropolitan region) is set by private, licensed insurance companies in a competitive market.

SIRA uses the frequency of claims and average claims costs to determine premium relativities for vehicle classes, including for taxis (Class 7) and private hire cars (Class 8). The insurer must use this relativity to set a base premium for each class of vehicle.

CTP insurers may use a variety of risk factors to offer a discount to drivers or riders considered to have a low risk profile or to impose a loading to those with a higher risk profile. Insurers face regulated limits on the discounts and loadings they may apply.

In setting a premium, an insurer may apply a variety of objective risk-rating factors including the age of the owner or driver, the driver's safety record, and insurance status or claims history.

## Taxi Green Slip prices

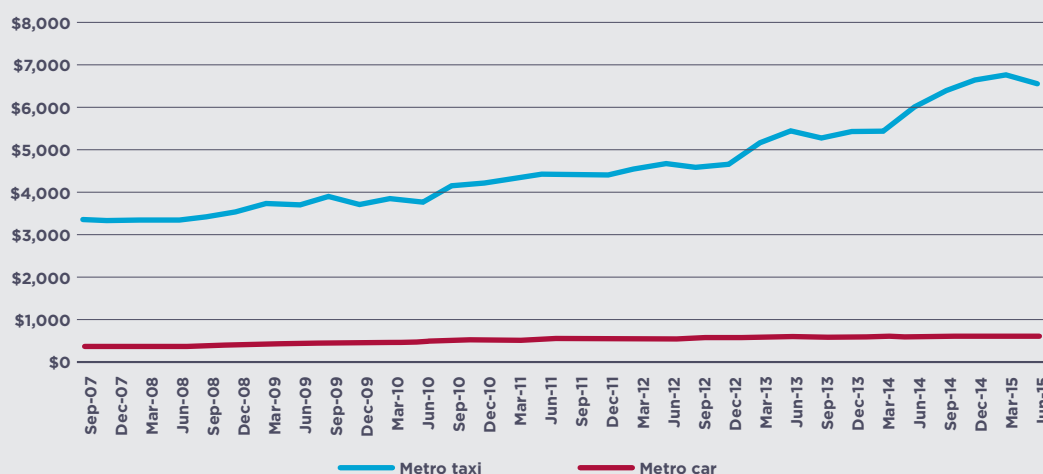
Taxi Green Slip premiums as a whole are currently appropriate for their risk – that is, taxis as a class are generally paying for the injuries caused by taxis. In setting the range of prices for taxis, insurers will generally consider whether the taxi has a T plate (metropolitan) or a TC plate (country), whether it is part of a fleet or not, and the age of the vehicle as rating factors when setting premiums.

In the last four years, taxi Green Slip prices in metropolitan areas have been more than 10 times higher than Green Slip prices for metropolitan passenger vehicles (see Figure 1 below).

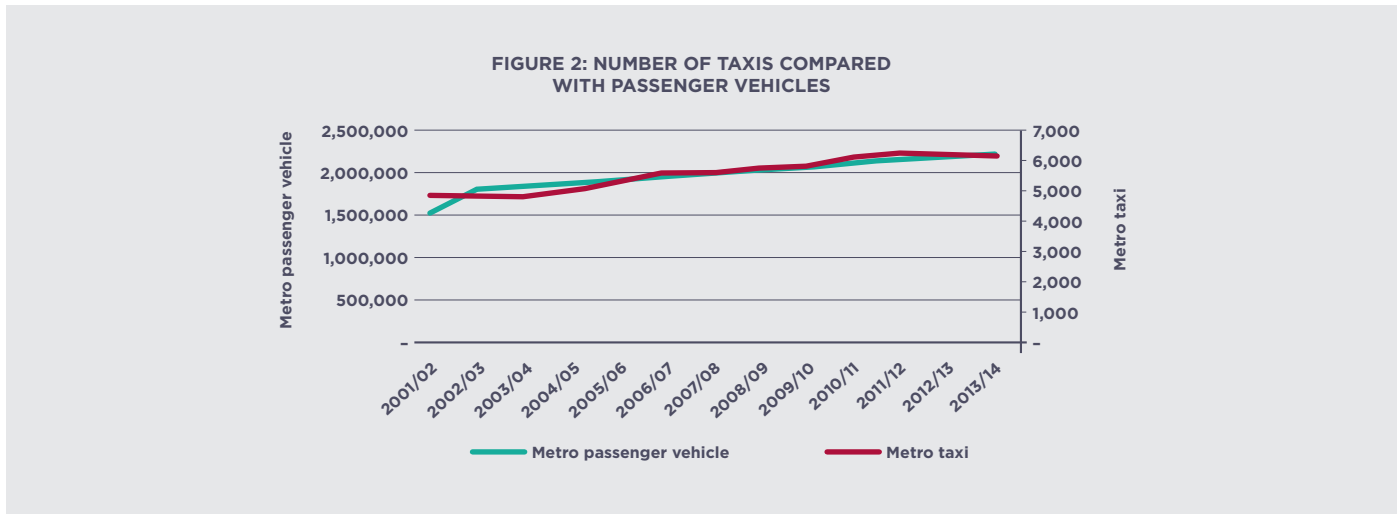
According to the NSW Taxi Council submissions to IPART, the Green Slip is one of the major cost components in keeping a taxi on the road.

In 2016, Sydney metropolitan taxi relativities increased from 11.5 to 11.88 times higher than that of a private passenger (Class 1) vehicle in the Sydney metropolitan area. Taxis in country regions have a lower relativity, reflecting the lower claims risk in those areas.

FIGURE 1: COMPARISON OF AVERAGE PREMIUMS (TAXI VERSUS CAR)

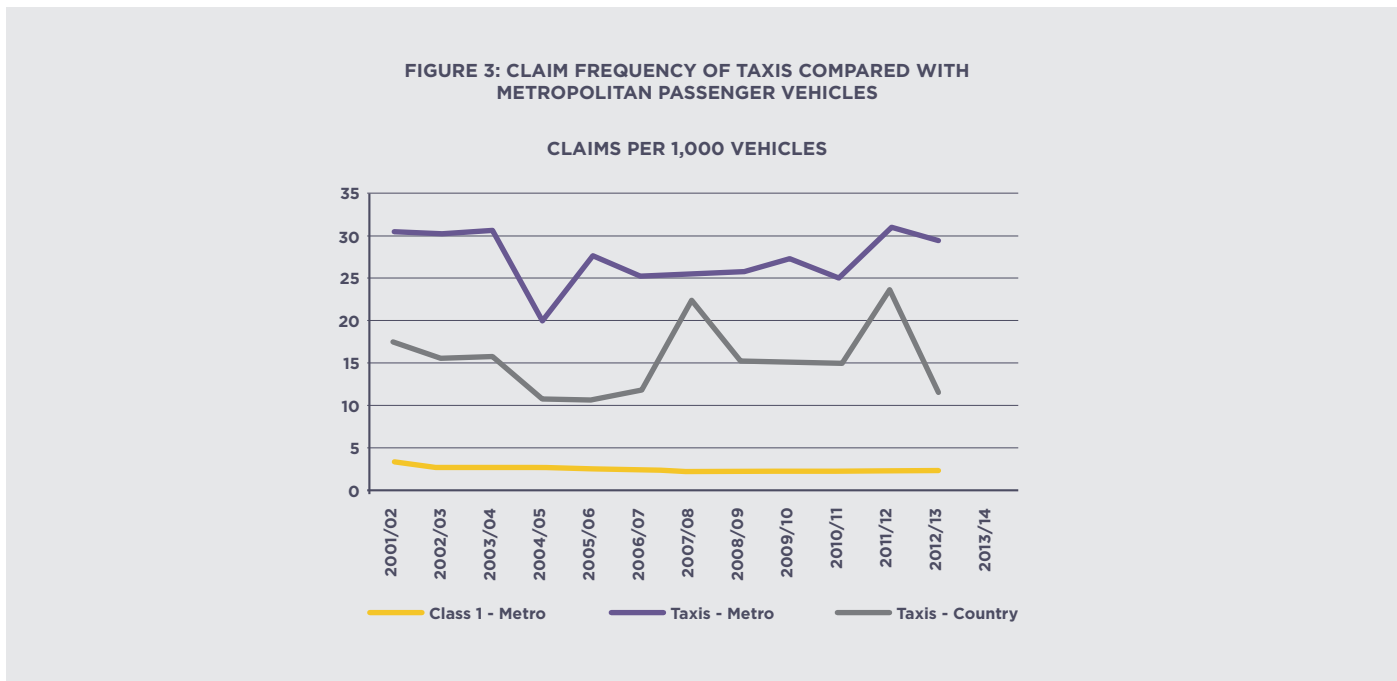


The relatively small number of taxis compared to the number of private passenger vehicles (Class 1 vehicles) means that the risk is spread across a smaller pool of vehicles. The combined effect is that taxi premiums are considerably higher than Class 1 vehicles.



In addition to the generally increasing CTP scheme costs and the emergence of an unusual trend in small, legally represented claims, which is affecting all vehicle owners - the higher risk profile of taxis (resulting from a high number of accidents involving taxis, and the high claims costs arising from those accidents) has been reflected in taxi

Green Slip prices. Figure 3 shows that the claims frequency for taxi accidents has increased in recent years and, for metropolitan taxis, is 10 times higher than that of passenger vehicles. Claims frequency is more volatile for country taxis due to lower numbers.



To a certain extent, this is due to taxis being on the road a lot more than other vehicles. Some taxis are also driven by people who do not own the taxi, and therefore do not bear any of the insurance costs associated with their own poor driving behaviour (known as a moral hazard).

Where and when taxis provide services is particularly relevant in understanding the high cost of taxi CTP prices.

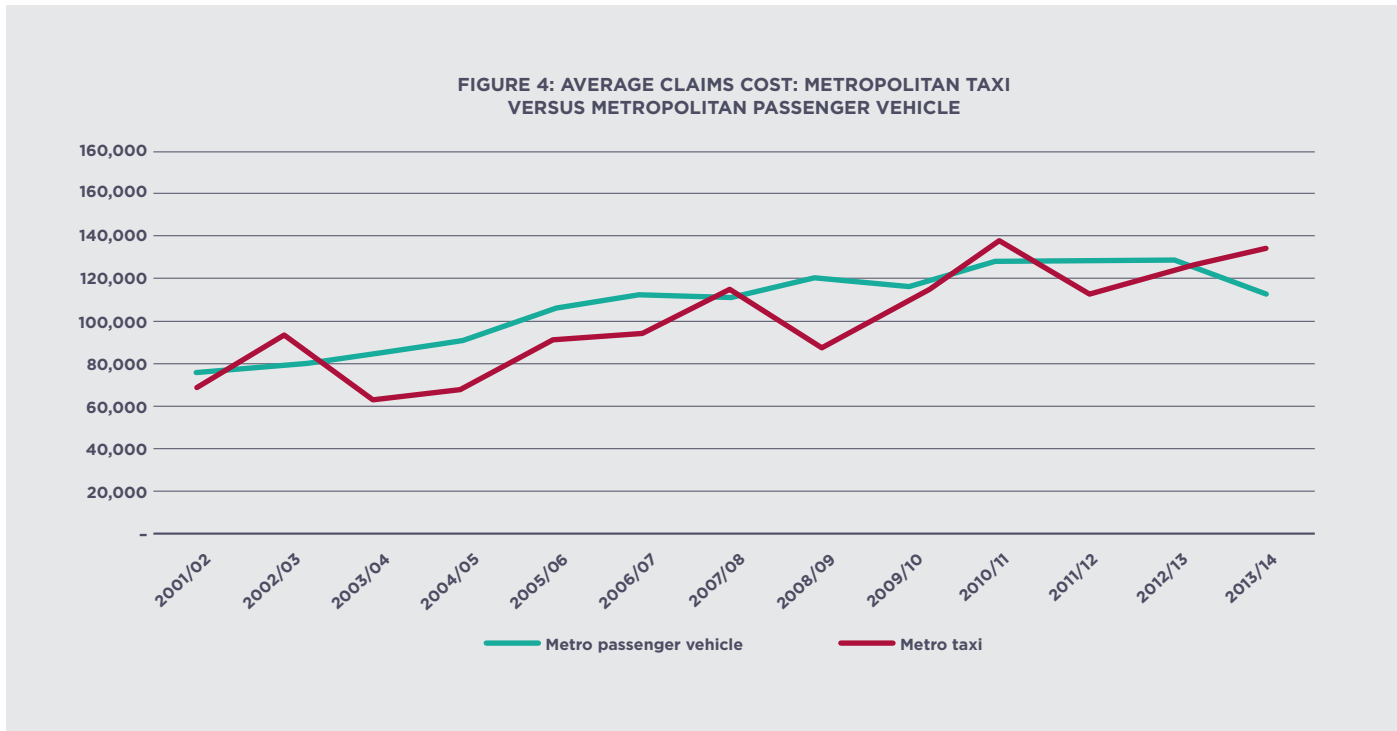
SIRA data shows that taxis are more likely to be involved in accidents resulting in a CTP claim in the Sydney Local Government Area, with 38 per cent of all casualties in NSW occurring in this area. Many accidents occur late at night on weekends and on busy roads.

A significant factor in the number and cost of claims against taxis is the high incidence of accidents involving pedestrians. While the majority of taxi accidents involve a collision with another vehicle, approximately 10 per cent of crashes involve a pedestrian. For the period between 2009 and 2013 in City of Sydney local government area, there were 264 CTP claims from accidents where a taxi was at fault and the injured person was a pedestrian. Pedestrians have a greater likelihood of suffering more serious injuries in motor accidents, which translates into higher claims costs. For example, the average cost of a claim by a pedestrian is around \$200,000, which is twice the cost of a claim by a driver.

The data also shows that during the same period within the Sydney CBD, there were 79 pedestrian casualties in taxi accidents between 1am and 4am where the taxi was at fault, and 68 casualties between 7pm and midnight. Most casualties occur on Friday and Saturday nights with people aged between 18 and 40 accounting for 80 per cent of all injuries during those times.

The average cost of an injury caused by a taxi is comparable to a Class 1 passenger car (see Figure 4 below) so the reason prices are higher is that there are simply more claims as a proportion of the total taxi fleet. Insurers respond to this higher risk with higher prices.

In response to concerns about these trends, SIRA partnered with the NSW Taxi Council to host a Taxi Roundtable in October 2015. The Roundtable brought together industry stakeholders to identify potential initiatives and opportunities to reduce taxi accidents and subsequently place downward pressure on taxi CTP premiums. SIRA is continuing to work closely with interested stakeholders to progress those initiatives.



## Limited competition in the taxi market

Issues surrounding insurer competition in the CTP market for taxis are also impacting their ability to shop around for the best price. While all licensed CTP insurers must write taxi premiums, the individual business models and pricing strategies of each insurer has resulted in the CTP insurance market for taxis being largely dominated by two of the licensed CTP insurers. Following one insurer's recent decision to withdraw from the CTP market, it is anticipated that there will be one primary provider of CTP insurance for the taxi industry with more than 98 per cent market share. The distribution of taxi policies is managed by a small number of brokers specialising in the taxi industry.

## Hire car Green Slip prices

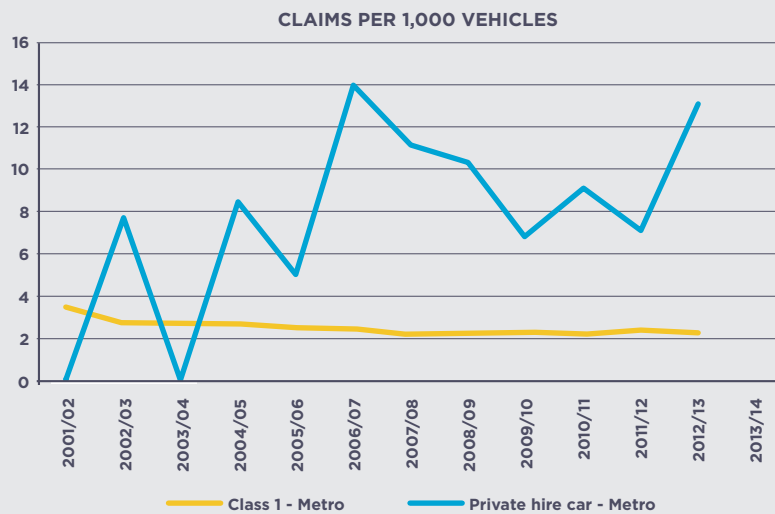
Compared with taxis, hire cars have lower premiums, with the base hire car premium being only about 20 per cent more than a passenger vehicle in metropolitan Sydney (i.e. a premium relativity of 121).

Hire cars have a lower risk profile compared to taxis. While the claims frequency for hire cars is still significantly higher than metropolitan passenger vehicles, it is still almost half that of taxis. (See Figure 5 below)

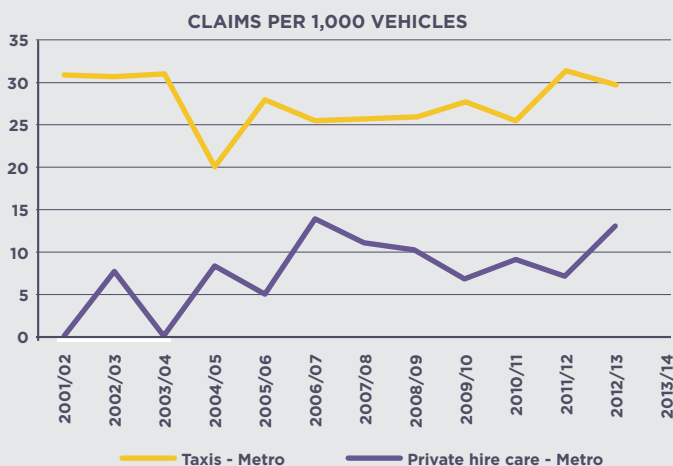
While the claims frequency for hire cars is much higher than for Class 1 passenger vehicles, the average claims size is significantly lower and this has been improving since 2010/2011. This is the main reason why hire car premiums are only slightly above Class 1.

For example, the average claims size for metropolitan passenger vehicles is currently approximately \$120,000, compared to about \$30,000 to \$40,000 (allowing for volatility) for that of metropolitan hire cars (see Figure 7 below). The average claim costs for hire cars are almost \$80,000 lower than that of taxis.

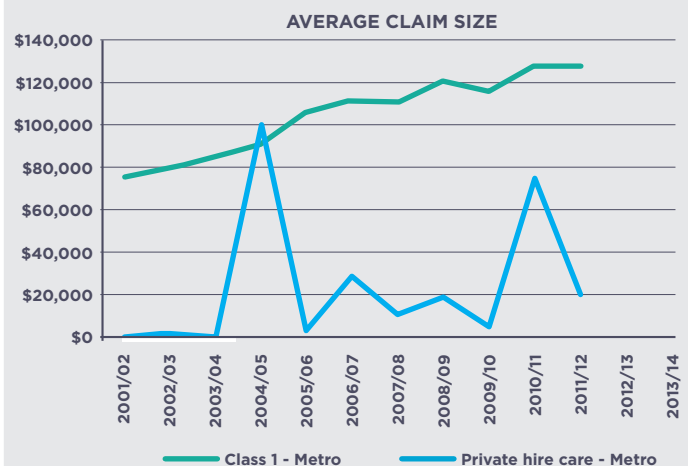
**FIGURE 5: CLAIM FREQUENCY OF METROPOLITAN PRIVATE HIRE CARS COMPARED WITH METROPOLITAN PASSENGER VEHICLES**



**FIGURE 6: CLAIM FREQUENCY OF TAXIS COMPARED WITH PRIVATE METRO HIRE CAR VEHICLES**



**FIGURE 7: AVERAGE CLAIMS COST: METROPOLITAN PRIVATE HIRE CARS VERSUS METROPOLITAN PASSENGER VEHICLE**



The disparity between taxi and hire car claims experience is partly due to the hire cars being on the road less and their absence from the 'rank and hail' market. Hire car operators often own and operate their own vehicle. There are also fewer hire cars, approximately 700 hire cars versus approximately 7000 taxis.

### Ride-share Green Slip prices

The risk exposure for motor vehicle accidents involving ride-sharing services in NSW is currently not known as these ride-sharing vehicles are predominantly private vehicles and are not specifically identified to Roads and Maritime Services or the CTP insurers as ride sharing vehicles.

As there is no separate classification for ride-share cars in CTP insurance, for the most part these cars are in the general pool of passenger vehicles. Anyone being injured by a vehicle in this class is being funded by the whole pool, including ride-share operators. Whether or not ride-share drivers are net contributors or net beneficiaries of this cross-subsidy is unknown.

The current average premium for a metropolitan passenger vehicle is \$637.

### Adequacy of current regulation of premiums for the point-to-point market

Insurance is essential to our economy and society. Insurance means that we can engage in otherwise risky but essential activities such as driving, knowing that the risk is spread across the community. An incident is not catastrophic unless the consequences are suffered by just one person. Inherently, insurance is not about the State subsidising risk, but by the pool of risks paying the cost collectively.

Accordingly, the current CTP premium system is not subsidised. The entire cost of paying for benefits and the running the scheme, needs to be met from the revenue collected from all road users.

In compulsory statutory schemes such as CTP, premiums are regulated to ensure that they are adequate but not excessive. The purpose of a premium structure is to work out how premiums will be distributed across the pool of risks. At one extreme, there could be a single price for all vehicles – this is the point of maximum cross subsidy. At the other extreme, insurers can freely risk rate each individual vehicle – which may make premiums unaffordable for some people. Most regulated CTP premium systems try to find the balance between these two extremes.

The current CTP premium structure is designed to ensure, to the extent possible, each class of vehicle pays its own way, while allowing for cross-subsidies within a class so that individual vehicle owners do not face unaffordable premiums. Accordingly, insurers must offer prices within a prescribed range, using the premium relativity as the 'base premium'. This means there are limits on the minimum price that can be offered to any individual vehicle owner in a class, but also limits on the maximum price.

What this means is that prices for taxis and hire cars are largely driven by the overall cost of their class as a whole. Prices cannot be lower than the prescribed minimum price (currently 15 per cent below the base premium for the class). This acts as a barrier for better risk taxi or hire car operators getting larger discounts or for insurers to be innovative in their underwriting strategies. By contrast higher risk ride-share operators are also protected by the maximum price on passenger vehicle prices.

In effect the current distinction between the various point-to-point vehicle classes in the premium rules is limiting the ability of the insurer to offer a price based on the real underlying risk, and adds to the perception that the point-to-point market is not operating on a level playing field.

As a society, we enjoy the fact that some point-to-point services are available in places and times of the day where there is higher risk. The question is how we best pool costs while still supporting risk based pricing.



# Insurance options for point-to-point vehicles

The following options set out some different ways in which the premium system might better accommodate the risks associated with different uses of vehicles in the point-to-point market.

The options presented are not exhaustive and comment is sought on the overall merits of the options. Variations within and between the various options could be considered.

## Option 1: Creation of a new vehicle class for ride-share services

It is proposed that under this option, ride-share vehicles would be required to identify themselves to RMS (or by some other mechanism) and a separate ride-share vehicle classification would be established. Premiums for ride-share vehicles would initially mirror hire car premiums and, as experience is gained, the relativity would be adjusted to reflect the risk. Taxis or hire cars as a class would continue to pay a premium appropriate to their risk.

It is noted that, a new ride-share class, which will become effective on 1 April 2016, has been introduced in the ACT following a review of the hire car and taxi premiums to ensure comparability with ride-share premiums and equity in the treatment of all point-to-point operators. Higher premiums will apply for ride-share vehicles, compared with private passenger vehicles, to reflect the higher assessed risk due to some commercial activity occurring and the consequential time spent on the road. Over time, the ACT will likely adjust the premium relativity according to the actual performance of the ride-share class.

### Benefits of a new vehicle class for ride-share services

One of the main benefits of establishing a new vehicle class for ride-share services is that over time, ride-share vehicles would pay premiums more reflective of their risk profile and that cross-subsidisation by private passenger vehicles of business usage for ride-share vehicles would be removed.

This would place each of the point-to-point classes as a whole on a level playing field.

### Challenges of a new vehicle class for ride-share services

One of the challenges of this option is compliance and enforcement difficulties surrounding ride-share vehicles declaring their status to RMS at the point of registration. Even if it were possible to identify if a vehicle is being used for ride-share purposes, under the current premium rules:

- It is still not easy to know if the vehicle is being used mostly for business, or mostly for private purposes, in order to set appropriate premium. If all ride-share operators were in the same vehicle class, this would disadvantage the low risk, or low use operator, who would have to cross-subsidise the higher risk operators. This would discourage disclosure by some ride-share operators.
- Likewise, good risk taxi operators, that may have a similar risk profile to a ride-share operator, are bundled into the general pool of taxis and will pay higher premiums than necessary to pay for high risk taxi operators. This may make them uncompetitive versus equivalent hire car or ride-share operators.

## Option 2: Creation of a point-to-point vehicle class

This option would involve the creation of a new point-to-point vehicle class which would include taxis, hire cars and ride-share vehicles, and potentially, partial deregulation in premium setting. A premium relativity would be determined for this class and a wide discount or bonus structure would apply with premiums based on actual claims experience data, or mandatory risk factors could be introduced to ensure like-for-like pricing. This option would require ride-share vehicles to identify themselves to RMS at the point of registration, or some equivalent, in order to ensure correct classification.

### **Benefits of creating a point-to-point vehicle class**

This option is in line with the Point-to-Point Taskforce's recommendation that vehicle owners be required to nominate at registration that their vehicle is being used for point-to-point services.

Benefits of this option include creation of a level playing field where all point-to-point transport vehicles are classified and risk rated on the same basis, ensuring equity for all players in the point-to-point vehicle transport market. Over time, an appropriate premium relative to the overall risk for all point-to-point vehicles would be collected, but with maximum flexibility to ensure individual risks are priced on a fair basis.

For example, by pooling all point-to-point vehicles together, vehicle usage may be a basis on which to calculate an appropriate premium at an individual level, irrespective of whether the vehicle is used as a taxi, hire car or ride-share. Available technology (e.g. telematics and dash-cams) could be installed in vehicles to track when and how they are being used in order to assess their relative risk and tailor an individual Green Slip price. Other driver behaviours could also influence price such as accident and infringement history for the respective vehicle could be used to reward safe driver behaviours with premium reductions.

Similarly, premium loadings could then be applied for vehicles with poor driving and accident histories or for those vehicles identified within the point-to-point vehicle class that choose not to install technology to track usage in their vehicle.

Another option would be to allow booked taxis or taxis that operate outside high risk areas such as the Sydney CBD to be entitled to premiums more closely aligned to other booked point-to-point vehicles such as ride-share. Rank and hail taxis and taxis that operate in high risk areas would pay more, to reflect the higher risk. However it may be difficult for insurers to determine which taxis are being used in these ways unless tracking technologies such as telematics are adopted, or if distinctions were made for different uses in the taxi regulatory system.

### **Challenges of creating a point-to-point vehicle class**

The better risk point-to-point vehicles may still be required to subsidise poor risk vehicles depending on the extent to which prices are allowed to vary in the class. This would act as a disincentive for the ride-share vehicle owner to disclose use. Some vehicles may see higher prices overall but other vehicles would see lower prices. Point-to-point operators may face disincentives to operate in

places or times of day where there is higher risk, as this may add to their insurance cost – this may result in a poorer outcome for passengers.

The same challenges appear in this option as in option 1 in relation to identification of ride-share vehicles. It could take at least two to three years for the correct premiums to be set for ride-share vehicles, and therefore all point-to-point to have premiums set according to their risk.

Risk avoidance behaviours by insurers are also a potential risk if insurers actively seek to avoid offering premiums for some (higher risk) point-to-point vehicles, which would require greater regulatory supervision. A risk equalisation mechanism may be required to spread the risk of point-to-point vehicles across all insurers to prevent risk avoidance.

### **Option 3: Deregulation of point to point premiums to allow risk rating**

Point-to-point operators would still be required to purchase a Green Slip before registering their vehicle, however they would be free to obtain it from any insurer at any price based on risk. This option would encourage innovation in underwriting offerings but may still require some level of consumer protection by SIRA to ensure insurers do not charge excessively.

#### **Benefits of deregulation of point-to-point services**

Point-to-point vehicles would be able to shop around for the best premium, based on their risk profile, and would pay an appropriate premium reflective of their risk. Insurers would be free to provide more tailored insurance premiums that are more reflective of individual vehicle risks based on usage, and this may encourage innovation such as telematics.

#### **Challenges of deregulation of point-to-point services**

The main challenge of this option would be to ensure that insurers do not charge excessive premiums and SIRA may need to ensure some level of protection for consumers.

For those poorer risk point-to-point vehicles, such as some taxis, this may mean significantly higher premiums and this may inhibit their ability to compete in the point-to-point market (however it would encourage the adoption of better practices and may see the exit of higher risk practices). Point-to-point operators may be discouraged from operating at certain times or places, to the detriment of passenger outcomes.

## Option 4: Rate all point-to-point vehicles as Class 1 vehicles

Under this option all point-to-point vehicles would be included in Class 1 passenger vehicles.

### Benefits of rating taxis and hire cars as Class 1 vehicles

Taxis, hire cars and ride-share vehicles would have a level playing field in terms of Green Slip premium prices, contributing to the sustainability of the taxi industry in the point-to-point transport market. Significant premium reductions for taxis may be passed down to consumers via lower taxi fares. There would be no need to establish a system of identification at the point of registration for ride-share vehicles.

### Challenges of rating taxis as Class 1 vehicles

Taxi relativities are almost 12 times higher than the current Class 1 private passenger vehicle relativity. This appropriately reflects their poorer risk profile and claims experience. Moving taxis and other point-to-point vehicles into Class 1 would result in a significant cross-subsidisation of poorer risks, driving prices up for everyone else in Class 1.

It is estimated that moving all point-to-point vehicles into Class 1 would result in an average CTP premium increase of at least \$18 for Class 1 vehicles in the Sydney metropolitan area.

This option would reduce price signalling for point-to-point operators and reduce incentives for the adoption of safer management systems. It would make high risk vehicles unattractive to private underwriters and may cause insurers to avoid high risk vehicles like taxis altogether. Feasibly, it could only work with a risk pool to cover high risk point-to-point vehicles, so that an insurer is not disadvantaged from writing high risk policies.

## Option 5: Risk pool (insurance levy on fares)

This option would involve a novel solution in which taxi networks and ride-share operators would be required to collect a levy on each fare, perhaps in high risk areas or times of the day, with a risk pool created to fund the additional insurance cost for insurers. This would mean that Green Slip prices would be significantly lower at the point of sale, and passengers would pay the balance of the insurance cost (ideally linked to risk).

The NSW Government is proposing an industry adjustment levy and the risk pool levy could be added to that. There are a number of ways this may be implemented. This option could be added

as an adjunct to one of the other options outlined above, or as a stand-alone arrangement in which a single insurer bids for and runs the risk pool.

### Benefits of a risk pool

This option would have the advantage of being user pays and related to vehicle usage, thus neither advantaging nor disadvantaging the vehicle owner who would simply collect and pass through the levy. It would ensure a more level playing field in terms of premium prices across the point-to-point market and contribute to the sustainability of taxis operating in the point-to-point market. It would mean that point-to-point operators would not be disadvantaged if they sought to operate in places and times of the day that are higher risk.

### Challenges of a risk pool

The main challenge of this option is the administrative and legal complexities in operating the risk pool and collecting revenue. Insurers may find this option less conducive for effective underwriting. Passengers may also see their fares rise and this may be a point of concern (however insurance is already implicitly built into fares). Point-to-point operators would have less incentive for safer behaviour as the risk pool would offset some of the insurance cost. Claims processes may be more complicated with the introduction of a separate insurance pool.

## Option 6: Retaining current vehicle class arrangements, but freeing up risk factors

Under this option, taxi and hire cars would retain their own class, and ride-share vehicles would remain in regular passenger vehicles. Insurers would be given greater freedom to set prices within each class. Ride share operators would need to declare the usage to the insurer.

### Benefits of retention of current classes but freeing risk factors

This could be implemented quickly and would require only limited system changes as the current system would remain as is. Each vehicle class would still pay its own way.

### Challenges of retention of current classes but freeing risk factors

Passenger vehicles (Class 1) would become more complicated as insurers would be free to risk-rate ride-share vehicles but not for other types of vehicles (opening the whole class to free rating would lead to very large price increases for some vehicle owners). Ride-share operators may have perverse incentives to only declare use when they think they may get a lower price. The price for some higher risk taxi and hire car operators would go up.

# Feedback

Feedback on the above options, including further suggestions on other structural changes that could be made to better support point-to-point transport can be provided to:

P2PReview@sira.nsw.gov.au

or by post marked confidential to:

Point-to-point review  
State Insurance Regulatory Authority  
Level 25  
580 George Street  
Sydney NSW 2000

Feedback must be submitted by **8 April 2016**

This options paper and a submission covering letter template is available from [sira.nsw.gov.au](http://sira.nsw.gov.au).

Please note that the Government has not yet made any decisions. All comments will be considered before the Government makes any decisions about whether changes will be made.

The Government reserves the right to publish submissions and authors should indicate if any or all of a submission should not be made public.



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## Disclaimer

This publication may contain information that relates to the regulation of Compulsory Third Party insurance in NSW. It may include some of your obligations under the various legislations that the State Insurance Regulatory Authority (SIRA) administers. To ensure you comply with your legal obligations you must refer to the appropriate legislation. Information on the latest laws can be checked by visiting the NSW Legislation website [legislation.nsw.gov.au](http://legislation.nsw.gov.au).

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