

Point to point Transport Discussion Paper Submission
2016

3rd April

Dear Sir/Madam

Please find following our submission for consideration from CD Limousines Pty
Ltd

Option 1.

In our opinion this should be the best and only option to be proposed as the go forward option, the current Taxi and Hire Car sections have been assessed by previous experience as well as documented history. The new rideshare group of vehicles should have its own division established as a new player to the system and be assessed on its own merit or to be placed immediately in the same category as Taxis as their mode of work is realistically and definitely a pseudo taxi service by any other name.

The issuer of the CTP slip needs to be a lot more proactive and investigative in the application process for the CTP Insurance as well as pointing out clearly and firmly to all applicants that any inconsistency or misrepresentation in the application or vehicle usage declaration for the CTP slip will result in the probability of the policy being null and void and any subsequent claims being probably denied making it the responsibility of the vehicle owner.

It should also be noted that the ride-share vehicles should definitely display some sort of approved identification on the vehicle (e.g. specific number plates or a label similar to the old NSW registration label) clearly showing the correct CTP insurance for the intended usage of the vehicle and also so that the general public can clearly identify the vehicle as a ride-share vehicle, it should also be noted that Taxis and Hire cars should have their current identification methods kept and or an alternative label for the Hire Cars similar to the described label previously proposed for the ride-share vehicles as well as their being no restrictions on additional ID for additional fleet vehicles.

Option 2.

This option leaves too many discrepancies that leaves it open to abuse and misrepresentation and also as pointed out why should the lower risk groups subsidize the higher risk groups.

We believe that the risk order is as follows

1. Taxis
2. Ride-share
3. Hire cars.
4. Commercial Vehicles
4. Private Vehicles

Option 3.

This option leaves it open for all the insuring and insured parties for misrepresentation and profiteering. This option would realistically need to be carefully monitored. Not very practical generally an all round difficult system to manage.

Option 4.

This option realistically does no favours to anyone other than the high risk Taxi operators group, we do not see any merit in this option and would promote a careless attitude as poor performance is rewarded by the good performance of others consequently we would not be in favour of this option at all.

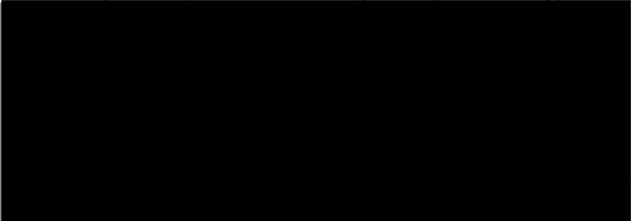
Option 5.

Do not see this option being workable and the complexities much outweighs the advantages and where is the proposed collection of the levy supposed to happen and once again we rely on the integrity of the operators to submit a true and accurate report!! Or is this going to be another compliance issue for the operator.

Option 6.

Do not support this option as it once again gives ride-share an unfair advantage against the rest of the public passenger vehicle industry.

In closing our vision going forward would be to see the creation of a separate category for all ride-share operators as well as a clear & visible distinction for the Taxi, Hire Cars (both restricted and unrestricted) and the ride-share vehicles, we really need to ensure that as an industry we ensure that all operators remain accountable for the performance of their journeys and not rely on other categories to subsidize their poor performance and practices.



Kindest regards and thanks
Vince Porfida Managing Director
CD Limousines Pty Ltd