

Dear Sirs,

I am an owner / operator in a medium size regional taxi network and would like to make a submission in relation to the recommendations by IPART that more than 124 new taxi licenses be issued and able to operate anywhere in regional New South Wales.

My comments are as follows:-

- as i understand there are no restrictions proposed on the new taxi plates / licenses proposed to be issued in Regional NSW, it could conceivably mean that the number of taxis operating in our Network could increase to 500% of current numbers !!

Equally, those 124 new taxis could become 'taxi mercenaries' and simply go from region to region coinciding with the festivals and events in those regions, and simply take the cream throughout New South Wales.

How can having no restrictions retain the viability of existing Networks, and the ability of owners and drivers to survive financially? Many drivers work through the 'normal ' times earning their commission of \$10 to \$15 per hour relying on the festivals to underpin their income.

- the point to point market is now incredibly and increasingly competitive. In addition to taxis, hire cars and ride share vehicles, there are hotel courtesy buses, and community transport (in increasing numbers). Further, some businesses are now operating their own fleet of courier and courtesy vehicles (eg suppliers to mining industry, pathology, and car servicing companies).

And public buses have improved transport routes and timetables.

And now there's a new \$1.10 (incl gst) passenger levy which will hit point to point passengers in the hip pocket potentially encouraging them to consider cheaper cost options.

And some of our contract customers are actively renegotiating contract rates.

ALL these things already reduce driver and owner income.

And now you want to potentially increase the number of rank and hail taxis operating in our region to 500% of the current number!!

- i purchased my taxi funded 100% by debt. And since the purchase, the market value of my taxi has reduced by approximately one-third. And it's anyone's guess how much further income and values will fall with the huge potentially increased competition now proposed.

So unlike those people who purchased their taxis with savings or superannuation, mine being fully debt funded means not only is my income and livelihood at risk, but so is my house... Is this what IPART really wants??

2.

- it was interesting to note that when the \$20,000 compensation payment to taxi owners was originally mooted, it was (in part) to partially offset reduction in capital values of taxis / Taxi plates.

But when the payments were ultimately made, they were made to offset loss of income and as an assistance package to help operators adapt to the changing market.

And now IPART states that the deregulation hasn't had the effect of reducing capital values of taxis as much as had been intended !

So it therefore seems clear that the \$20,000 shouldn't actually be treated as income and taxed accordingly. But rather it should be treated as a capital item and used to reduce the original capital cost of the taxi / taxi plates, and thus NOT taxed as income.

In conclusion, because of the extent of change which has occurred, and the further changes currently flowing through, I believe that it is WAY TOO EARLY to even consider whether additional taxi licenses should be issued. In my opinion, this matter should reasonably be deferred and reassessed in maybe another 3 to 5 years after overall effects of the deregulated industry can be better determined.

However, in the event that IPARTs recommendations are adopted, i believe that numbers of additional rank and hail taxis needs to be scaled by regions.

And that there MUST be appropriate LARGE identification on new taxis which identify the vehicles which can operate as 'no region' rank and hail taxis so that other (existing) regional taxis cannot work rank and hail outside their designated network areas.

Sincerely