

**Submission on the 2009 REVIEW of TAXI FARES in NSW
Information Paper**

**PREPARED for the INDEPENDENT PRICING and
REGULATORY TRIBUNAL**

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1. Introduction

The Physical Disability Council of NSW (PDCN) would like to thank the Independent Pricing and Regulatory Tribunal (IPART) for this opportunity to provide a submission regarding the 2009 Review of Taxi Fares terms of reference information paper.

PDCN contends the social and economic impact of any change in the distribution of charges, or an increase in overall costs is particularly relevant to people with physical disability. This should be considered when providing input for any considerations or recommendations.

To this end, PDCN provides the following simple examples taken from Wheelchair Accessible Taxi (WAT) services, to best illustrate the social and economic impact of any increase in charges for our main target group. PDCN would draw attention to these examples to show the real cost of any change in costs or charges and their detrimental effect on fares. PDCN argues this is also the case when referring to those on low or fixed incomes, as well as those who depend on taxis for all transportation.

- For people reliant on Government benefits, their capacity to do their shopping and remain active members of their community becomes more limited. PDCN argues that with an ageing population, those reliant on WATs will increase substantially.¹
- WAT passengers who earn an income, often have many other disability related expenses, leaving only a minimal disposable income to spend on taxi fares, which places unacceptable added pressure on an already small wage. PDCN asserts the cost of taxi fares is already a disincentive for people with physical disability attempting to gain employment. Any increase in the cost of taxi travel therefore isolates people with disability from the employment market.²
- Due to limited availability of accessible public transport, options available to a broader public are not available to passengers needing wheelchair access. People using WATs for small journeys such as going to the local shops, are adversely effected by any increased cost, as it jeopardizes their ability to access any number of regular social activities often taken for granted, including visiting the shops. This again isolates socially and penalises financially.³

¹ REPORT on the REVIEW of TAXI FARES in NSW Transport – Draft Report and Draft Recommendations MAY 2008 PREPARED for the INDEPENDENT PRICING and REGULATORY TRIBUNAL
Jordana Goodman Project Officer, Physical Disability Council of NSW p7.

² Loc. Cit.

³ Loc. Cit.

2. Recommendations

PDCN makes the following recommendations in response to the IPART 2009 Review of Taxi Fares Information Paper

1. PDCN would recommend that the allocation of any increased charge be allocated to operator costs. Not driver costs.⁴
2. PDCN would also recommend and support any labour cost adjustment being linked to productivity increases. PDCN sees this as a reasonable accommodation to ensure the quality of service is maintained. The NSW taxi Council fare proposal acknowledges a “5.1% decline in productivity in the transport sector”⁵ based on ABS data, while acknowledging an increase in productivity across all other sectors.
3. PDCN respectfully highlights the existing discrepancy in the Levels of Standards of Service in relation to Wheelchair Accessible Taxis (WATs) when compared to standard taxis. The standard of performance for WATs is significantly lower than the network standard.⁶ A key indicator being waiting times.⁷

PDCN contends that any proposed change in this area should be linked with and applied to an overhaul of the Taxi Transport Subsidy Scheme (TTSS). The scheme should allow for and absorb an increased percentage of any fare (50%-75%)⁸ or related increase that impacts directly on those utilizing the scheme for all their transportation needs. This would also require a minimum increase of the cap from \$30 to \$40⁹

4. PDCN does not support a six monthly review of LPG costs. This would place an unacceptable level of pressure on the cost of living and household budgets of those dependent on WATs for transportation. More broadly, single income households and those on fixed or low incomes, would also be adversely effected.
5. PDCN recommends that a more thorough investigation of network fees would be achieved through an independent third party audit of these costs and fees. PDCN questions the assertion that the quotes are verifiable as independent, as they all originate from the networks themselves.

⁴ Independent Pricing and Regulatory Tribunal 2009 Review of Taxi Fares Information Paper p5 Table 2.

⁵ NSW Taxi Council LTD 2009 Review of Taxi Fares submission 11.03.09 Ref: 047/2009 p5.

⁶ Independent Pricing and Regulatory Tribunal 2009 Review of Taxi Fares Information Paper p9 Table 6.

⁷ Loc. Cit.

⁸ REPORT on the REVIEW of TAXI FARES in NSW Transport – Draft Report and Draft Recommendations MAY 2008 PREPARED for the INDEPENDENT PRICING and REGULATORY TRIBUNAL Jordana Goodman Project Officer, Physical Disability Council of NSW p8.

⁹ Loc. Cit.

PDCN has further cause for concern, as the 2009 Review of Taxi Fares Information Paper indicates these network fees are “To be determined”¹⁰ There is arguably, the possibility of bias when referring to the figures as provided by the taxi networks.

6. PDCN recommends that as part of the Disability Standards for Accessible Public Transport (2002), Schedule 1 – Taxi dates for Compliance, Part 1 – Target date – 31 December 2007, data needs to be collected to help address this discrepancy in the Levels of Standards of Service for passengers using the Wheelchair Accessible Taxi service. This measure could then be used as the basis of a key performance indicator.

3. Who are The Physical Disability Council of NSW (PDCN)?

Strategic Objectives

PDCN is the peak organisation that represents people with physical disability across New South Wales. PDCN informs the policy agenda for inclusive community practices and participates in decision making process in partnership with all levels of government.

Objects of PDCN are:

1. To educate, inform and assist people with physical disabilities in NSW regarding the range of services, structures and programs available that enable their full participation, equality of opportunity and equality of citizenship.
2. To develop the capacity of people with physical disability in NSW to identify their own goals and the confidence to identify a pathway to achieve their goals (ie advocate for themselves)
3. To educate and inform all stakeholders about the needs of people with physical disabilities so they are able to achieve and maintain full participation, equality of opportunity and equality of citizenship.

Conclusion

Focusing particularly on the issues that IPART seeks comment on, PDCN has attempted to draw attention to the social and economic impact of any change in costs or charges and their detrimental effect on fares for our stakeholders. Although our comments focus on Wheelchair Accessible Taxis (WATs), PDCN contends that any recommendations apply to taxis in general. That is, they are universal in their application.

¹⁰ Independent Pricing and Regulatory Tribunal 2009 Review of Taxi Fares Information Paper p5 Table 2.