

**RESPONSE TO THE INDEPENDENT PRICING AND
REGULATORY TRIBUNAL REVIEW INTO TAXI FARES –**

April 2006

Jordana Goodman
Project Officer
Physical Disability Council of NSW
St Helens Community Centre
3/184 Glebe Point Road
Glebe NSW 2037

Freecall: 1800 688 831
Phone: 02 9552 1606
Fax: 02 9552 1606
Fax: 02 9552 4644
Web: <http://www.pdcn.nsw.org.au/>
Email: pdensw@pdensw.org.au

PDCN is funded by the NSW Government's Department of Ageing, Disability and Home Care. Views expressed by PDCN Inc. are not necessarily endorse by the NSW Government.

TAXI INDUSTRY FARE REVIEW

As part of the review into taxi fares in NSW, the Physical Disability Council of NSW submits this feedback to the Independent Pricing and Regulatory Tribunal (IPART). Terms of Reference as provided by IPART are:

- i. The cost of providing services concerned;
- ii. The protection of consumers from abuses of monopoly power in terms of prices, pricing policies and standards of service;
- iii. The need for greater efficiency in the supply of services so as to reduce costs for the benefit of the consumer;
- iv. The impact of pricing policies of borrowing and capital requirements and, in particular, the impact of any need to renew or increase relevant assets;
- v. The need to maintain ecologically sustainable development;
- vi. The social impact of the recommendations;
- vii. Standards of quality, reliability and safety of services concerned (whether those standards are specified by legislation, agreement or otherwise and any suggested or actual changes to those standards as notified to the Tribunal by the Minister of Transport); and
- viii. The effect of any pricing recommendation on the level of Government funding.

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1. Executive Summary

The Physical Disability Council of NSW recommends the Independent Pricing and Regulatory Tribunal (IPART) advise the NSW Ministry of Transport to implement the recommends listed below to increase the availability and improve the affordability of taxis providing wheelchair access in the Sydney Transport District and country NSW.

Summary of Recommendations:

The Physical Disability Council of NSW (PDCN) recommends:

- i. The 15-minute upper limit on waiting time for wheelchair accessible taxis be retained unless and until a Smart Card regime is implemented for passengers entitled to the NSW Taxi Travel Subsidy Scheme (TTSS). ([Section 4](#))
- ii. The NSW Ministry of Transport obtains additional data to determine why response times are unacceptable for 30% of wheelchair passengers. ([Section 5](#))
- iii. Taxi networks in country NSW purchase taxis for passengers in wheelchairs living in country NSW, in the local government areas identified. ([Section 6](#))
- iv. There be increased regulation of taxi drivers with WAT plates to ensure that M50 jobs are equally distributed. ([Section 7](#))
- v. The level of TTSS subsidy to be increased from 50% to 75% of the metered fare. ([Section 8](#))
- vi. IPART to support the current subsidies provided by the NSW Ministry of Transport, but consider increasing the Taxi Transport Subsidy Scheme. ([Section 9](#))
- vii. New performance standards for WAT services be introduced before 2007, in accordance with the Commonwealth Accessible Public Transport Disability Standards. ([Section 10](#))

2. Background Information on Disability

The TTSS provides a vital transport mode particularly for a significant number of passengers, who commonly can't use any other forms of public transport. PDCN members use taxis which provide wheelchair access in order to attend employment, school, tertiary education, leisure and recreation, medical and hospital appointments, as well as business and commercial purposes. Many members of PDCN use taxis with wheelchair access up to 3 times per week to attend appointments.

Currently there are only 288 taxis with wheelchair access within the Sydney Transport District. When compared to other cities in Australia, the Sydney

Transport District has the lowest proportion of suitable taxis per regular fleet. This limited availability impacts considerably on the mobility and independence of passengers, particularly at times of the day when these taxis are contracted by the NSW Department of Education for school children with disabilities, and out of business hours.

As many as 40% of all bookings for wheelchair accessible taxis are made through private booking arrangements, principally because of the risk of delay of services booked through the '0200' central booking service. (1)

3. About the Physical Disability Council of NSW

PDCN is the peak body representing people with physical disability in New South Wales and a member of the Physical Disability Council of Australia. PDCN focuses on issues relevant to people with physical disabilities, such as access to the built environment, transport and access to aids and equipment.

An inclusive society is achieved when people with disability are involved in every aspect of political, social, economic and cultural life. Access to all modes of public transport is essential to facilitate community inclusion in all aspects of daily living.

At least 75% of the membership of PDCN are people with a physical disability and consequently PDCN is able to represent the needs and interests of people with a physical disability. Membership of PDCN includes people with a variety of different disabilities, from young children and their carers, to aged people, living in either metropolitan Sydney or country NSW from a wide range of socio-economic circumstances. PDCN has the background, knowledge and skills to advocate on all levels of Government regarding the needs of people with a disability.

Members of PDCN are encouraged to become involved in the decision making process, so that Government and non- Government bodies become familiar with issues relevant to people with physical disabilities.

PDCN effectively networks with other disability sector organisations on common goals and issues. Subsequently PDCN strives to bring about significant, permanent and positive changes to the circumstances of people with physical disability. The goal is to secure equal civil and human rights for people with disability.

Promotional activities assist to educate and inform all members of the community, most frequently through the media. Publications produced by PDCN facilitate this educative process.

PDCN is funded by the NSW Department of Ageing, Disability and Home Care, employing four staff members, based in Glebe.

4. Limit on waiting time charge of taxis that provide wheelchair access

The Physical Disability Council of NSW is not in favour of the removal of the fifteen-minute limit on WAT waiting time at this juncture.

The fifteen-minute limit on WAT waiting time was a mechanism introduced to prevent abuse of the paper-based Taxi Transport Subsidy Scheme (TTSS).

Before this intervention, written dockets were submitted and charges levied for longer periods of waiting than actually occurred. A passenger with a physical disability may have been unable to independently complete the paper dockets required for the Scheme and/or pay the taxi driver and hence required assistance from the taxi driver. Subsequently there was increased risk of totals being manipulated by the taxi driver. Passengers were often manipulated by taxi drivers and subsequently pressured into covertly participating in this fraudulent action.

It is understood that the 'Smart Card' has the capacity to electronically record all details regarding the taxi journey. Due to the combined technologies of the Smart Card and Global Positioning System, it is understood that when introduced, abuse of the system will be largely decreased. Implementation of the 'Smartcard' will provide the opportunity for all stakeholders including passengers, drivers, operators, networks and Government Departments to regain confidence in the Scheme. Consequently PDCN strongly believes the Smartcard needs to be introduced before considering removal of the fifteen-minute limit on WAT waiting time.

For these reasons PDCN urges the Tribunal:

- **To retain the 15-minute upper limit on waiting time for taxis which provide wheelchair access unless and until a Smart Card regime is established for the NSW Taxi Travel Subsidy Scheme.**
- **For the NSW Ministry of Transport to implement the Smart Card for TTSS passengers as soon as possible.**

5. Collection of accurate data to determine why the taxi response time is unacceptable for 30% wheelchair passengers.

The Physical Disability Council of NSW is in favour of the NSW Ministry of Transport adopt a greater responsibility in monitoring the delivery of services to ensure that M50 trips are equably distributed. Particularly in areas where response times are unacceptable, such as on the Northern Beaches of Sydney and Liverpool/ Campbelltown/ Camden area.

In 2004/05 TTSS provided 218,892 M50 trips in the Sydney Transport District. Approximately 30% of booking response times for taxis providing wheelchair access took more than the 20 minute limit, accepted as the limit by the NSW Ministry of Transport. Consequently PDCN would recommend that the NSW Ministry of Transport conduct further analysis to try to determine why a large portion of taxi passengers are not receiving services that are acceptable to the Ministry. To investigate this issue further, it is suggested that the NSW Ministry of Transport assess the following:

- Time of making the booking, dispensing the taxi trip and the point of pickup
- Locality of pickup and drop-off
- Time taken to conduct taxi trip
- Time of the day and day of the week
- Type of taxi preferred

PDCN urges the Tribunal:

- **To recommend that the NSW Ministry of Transport obtains additional data to determine why response times are unacceptable for 30% of wheelchair passengers.**

6. Taxis that provide wheelchair access in country NSW

Research conducted by PDCN has identified the following local government areas in country NSW require taxis with wheelchair access or otherwise require additional taxis services:

- Clarence Valley
- Eurobodella
- Great Lakes
- Hastings
- Nambucca
- Shoalhaven

- Cooma- Monaro
- Forbes
- Gunnedah
- Nambucca
- Narrabri
- Parkes
- Wellington
- Young
- Bathurst
- Broken Hill
- Clarence Valley
- Goulburn
- Newcastle
- Orange
- Queanbeyan
- Tweed
- Wollongong

PDCN recommends the Tribunal:

- **To investigate the possibility of increasing the number of taxis providing wheelchair access in the local government areas identified above.**

7. Regulation of Taxi Drivers with WAT Plates

Currently NSW Ministry of Transport provide taxi operators with cheaper taxi plates for drivers offering wheelchair access on the proviso that these drivers transport wheelchair passengers. The Ministry must regulate to ensure these conditions are adhered to. Increased regulation will increase the availability for service passengers and hence decrease waiting time for the 30% of service passengers who are still receiving an unacceptable service from the M50 taxi service.

PDCN recommends the Tribunal:

- **Increase regulation and monitoring of taxi drivers with WAT plates to ensure that passengers using the M50 service receive an adequate service.**

8. Taxi Transport Subsidy Scheme

PDCN proposes that the level of subsidy be increased from 50% of the fare to 75% of the fare and that the upper limit of the subsidy be increased from its current \$30 to \$40. Passengers in wheelchairs travelling in Western Australia are already entitled to a subsidy of 75% with a \$25 limit.

In Table 5.4 on page 32 of its *Issues Paper*, IPART reports taxi fares in NSW are currently 22.3% higher than they were on 1st July 1999. During the same period there has been no increase in the level of subsidy made available to people eligible for support through the TTSS. It is well known that most people with disability live on fixed incomes which have barely kept pace with inflation. (According to various sources it is about 80% of the total number of people with disability.) When the effects of the introduction of GST are included it is clear that for most people with disability there has been a drop in real income during a period when taxi fares have increased.

PDCN has argued in favour of an increase to the subsidy since at least 1998 and will continue to do so.

The Final Report on Disability Services, entitled *'Making It Happen'*, published by the Legislative Council of the NSW Parliament in December 2002, recommends the subsidy be increased to 75% **(2)**. The Legislative Council suggested an increase of five percentage points each year for five years. We understand their wish to see staged introduction of any increase herewith the administrative complexities outweigh the financial benefits. Therefore PDCN proposes an immediate increase from 50% to 75% of the fare.

Many people with disability rely more than most on wheelchair accessible taxi services. They may experience some of the greatest financial difficulty of all groups who make use of these vehicles. We are thinking, particularly, of people who live in regional NSW or on the fringes of the major city centres who may have to travel above average distances more often than most services passengers. It is to recognise the financial burden placed on people in such circumstances that we propose an increase of \$10 in the upper limit of the subsidy. We seek its increase from \$30 to \$40.

Most wheelchair passengers will never need to avail themselves of the upper end of the scale of subsidy available because they make journeys that are, most of the time, below the upper limit. For people whose living

situations mean they must make longer journeys to reach health, community or other settings, an increase to the upper limit of the fare subsidy would be a just development.

PDCN seeks the support of the Tribunal:

- **To increase the level of the TTSS subsidy from 50% of the metered fare to 75%.**
- **To increase the upper limit of subsidised fare from \$30 to \$40.**

9. Existing subsidies provided by the Ministry of Transport

PDCN recommends that the NSW Ministry of Transport retains the current subsidies to the taxi transport providers and people with disabilities:

- a. \$2,000 to purchase a taxi plate to be used to transport wheelchair passengers
- b. Loan of \$30,000 available to country taxi networks

PDCN recommends the Tribunal:

- **Support the current subsidies provided by the NSW Ministry of Transport and increase entitlements to the Taxi Transport Subsidy Scheme.**

10. Performance Requirements

PDCN calls for the introduction of new performance standards for WAT services.

The key date for taxi cooperatives, networks and drivers is 31 December 2007 to ensure conformance with the Commonwealth Disability Standards for Accessible Public Transport.

Physical Disability Council of NSW
26th April 2006

[PDCN-IPART](#)

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1. "Wheelchair Accessible Taxi Taskforce" – Draft Taskforce Report (Report by the Wheelchair Accessible Taxi Review Taskforce) Chaired by the Barrie Unsworth November 2005, page 26
 2. 'Making It Happen' – Final Report (NSW Parliament Legislative Council) Recommendation 12, page 29
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