

**RESPONSE TO THE INDEPENDENT PRICING AND
REGULATORY TRIBUNAL REVIEW INTO
TAXI FARES
– April 2007–**

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

TAXI 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 (PDCN) recommends the NSW Independent Pricing and Regulatory Tribunal (IPART) advise the NSW Ministry of Transport to implement the recommendations listed below as part of the Taxi Fare Review (2007) to ensure equity for passengers requiring taxis with wheelchair access.

2. **Summary of Recommendations**

The Physical Disability Council of NSW (PDCN) recommends:

Recommendation 1: PDCN urges IPART to recommend the introduction of a universal taxi fleet by providing an equitable taxi service for all members of the community. PDCN further recommends that each of the regular taxis be replaced with taxis that provide access of people with disabilities. This will make the taxi fleet accessible after ten years. ([Section 6](#))

Recommendation 2: PDCN supports the introduction of a 'lift/ loading fee' from \$5- \$10.00 only if this charge is paid by the government but not by the WATS passenger. ([Section 7](#))

Recommendation 3: PDCN seeks the support of IPART:

- To increase the level of the TTSS subsidy from 50% of the metered fare to 75%; and
- To increase the upper limit of subsidised fare from \$30 to \$40. ([Section 8](#))

Recommendation 4: PDCN urges IPART to ensure that information regarding performance standards for WATS to be made public. ([Section 9](#))

Recommendation 5: PDCN seeks the support of IPART to recommend to taxi networks in rural NSW to purchase a WAT as part of the regular taxi fleet, or additional WATS for larger rural towns. ([Section 10](#))

Recommendation 6: PDCN recommends to IPART for increased regulation and monitoring to ensure that passengers of WAT services receive an adequate service. ([Section 11](#))

Recommendation 7: PDCN recommends that the NSW Ministry of Transport increases the current subsidies to the taxi transport providers and people with disabilities. ([Section 12](#))

Recommendation 8: PDCN calls for the introduction of new performance standards for WAT services. ([Section 13](#))

3. Background Information on Taxi Transport Subsidy Scheme

In 1981 the then Minister of Transport established the first Joint Committee on Transportation for the Disabled to examine and make recommendations to improve access to public transport, including the introduction of the Taxi Transport Subsidy Scheme (TTSS) to provide a 50% reduction on taxi fares, with a maximum subsidy of \$30.00. This subsidy is available to passengers using WATS and to passengers with physical disabilities using regular taxis.

Many people with physical disabilities receive either the Disability Support Pension or the Aged Pension, with a fortnightly income of just \$500 per fortnight. Consequently the TTSS offers only limited benefits to many people on limited incomes such as people on these pensions. For many people with physical disabilities using WATS is the only option since other modes of public transport such as buses, trains and ferries are either not available in that locality, or is not accessible.

4. Background Information on Wheelchair Accessible Taxis

- Over the past 30 years the availability of transport for people with disabilities has improved significantly, from needing to travel via ambulance, institutional bus transport, Community Transport available through the HACC program, and Wheelchair Accessible Taxis.
- Accessible and affordable public transport is crucial before equality and true citizenship can be achieved. The availability of transport provides a vital mechanism for all members of the community to participate in all activities of daily living, such as going to school or work. Many people with limited mobility require taxis with wheelchair access up to three times per week to attend appointments. Without access to public transport, the only option for many people with limited mobility is to rely solely on WATS.
- As of 30 June 2006 there was a total of 4,983 taxis in the Greater Sydney Metropolitan area with only 320 or 6.4% of the regular fleet with wheelchair accessible taxis, and 193 or 14.9% in the rural NSW.
- Even these figures for rural NSW vary significantly depending on the locality, and hence misleading to only consider just the proportion in the Greater Sydney Metropolitan area or rural NSW. In the Greater Sydney Metropolitan area, taxis with wheelchair access are difficult to obtain in Newcastle, the Liverpool/Campbelltown areas and on the Northern Beaches of Sydney.
- When compared to other cities in Australia, Greater Sydney Metropolitan area 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.
- Many of the smaller local government areas in rural NSW do not provide taxis with wheelchair access, but in the larger local government areas (LGA) this proportion may vary from only 4% as in the Bathurst LGA to 50% in the following LGA's; Ballina, Byron, Great Lakes, Hastings, Narromine, Port Stephens and Walgett.

5. About the Physical Disability Council of NSW

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

An inclusive society is achieved when people with limited mobility 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.

PDCN is able to represent the needs and interests of people with limited mobility. Membership of PDCN includes people with a range of mobility issues, from young children and their carers, to aged people, living in either Greater Sydney Metropolitan area or rural NSW all 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 limited mobility.

PDCN encourages people with limited mobility to become involved in the decision making process, so that Government and non- Government bodies become familiar with relevant issues.

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

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

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

6. Future Viability of the WAT fleet

Recommendation 1: PDCN urges IPART to recommend the introduction of a universal taxi fleet by providing an equitable taxi service for all members of the community. PDCN further recommends that each of the regular taxis be replaced with taxis that provide access of people with disabilities. This will make the taxi fleet accessible after ten years.

Recently the Australian Taxi Industry Association commissioned a report into the provision of WATS in Australia. This report makes a number of assumptions and fails to understand the relationship between the limited availability of WATS and the delivery of performance standards. Issues identified by the taxi industry include:

- 'The prohibitive cost of entry to become a WAT operator and driver;
- WAT bookings are not lucrative due to the time incurred by drivers in carrying out each booking;
- Disabled people may at times be more difficult and challenging to deal with and thus making it hard to attract new drivers; and

- The potential for the taxi industry to contribute to the ‘community transport’ task given that the population is ageing’.¹

Contrary to the suggestion in this report that transport be provided charitably by the taxi industry, PDCN recommends the introduction of a universal taxi fleet, similar to that available in London since 1999. For further information regarding the Londoncab see <http://www.londonblack-cab.com/aboutus.html>. A universal taxi fleet could be achieved by replacing six hundred (600) regular taxis with taxis that provide wheelchair access as part of the normal replacement program over the following ten years.

7. ‘Lift fee’ to provide financial compensation to operators purchasing Wheelchair Accessible Taxis

Recommendation 2: PDCN supports the introduction of a ‘lift/ loading fee’ from \$5- \$10.00 only if this charge is paid by the government but not by the WATS passenger.

It has been suggested in the report commissioned by the Australian Taxi Industry Association that an additional lift/ loading fee be introduced exclusively for passengers using WATS to assist with the additional costs of purchasing and modifying a WAT.² Only WAT passengers using the 0200 network would be exempt from this charge. In several other states of Australia a lift fee of between \$5- \$10 is provided by the government for this purpose. PDCN will only support this additional charge if paid by the government, for the following reasons:

- Cost of existing taxi fares – Many of our constituency receive only just over \$500 per fortnight in government benefits, and already have many health related expenses such as for aids and equipment, personal care services and home modifications, and hence any additional cost of transport is undesirable;
- Incentive to take passengers requiring WATS – For taxi drivers who have completed appropriate training an incentive may encourage taxi drivers to fulfil their obligations to transport passengers requiring WATS.
- Cost of taxi fares not equitable – The costs associated with taxi travel are already incomparable even without the additional lift fee, when compared to the benefits other pensioners obtain when using other modes of public transport;
- Potential financial abuse – Even after considering the benefits of introducing a lift fee of \$10.00 to offset any potential financial abuse if the taxi metre is turned on too early, the meter would need to be left running for more than 12 minutes on the wait- time of \$0.72 to make this a worthy suggestion; and
- Limited options available – Again it needs to be stressed that utilizing WATS is the only option for many of our constituency.
- It needs to be reinforced that many people with physical disabilities are unable to use other modes of public transport, and consequently rely on WATS for all transport needs.

¹ Australian National University, Transporting the Wheelchair Dependant – A Review of Wheelchair Accessible Taxis in Australia (2007), page 27.

² Australian National University, Transporting the Wheelchair Dependant - A Review of Wheelchair Accessible Taxis in Australia (2007), page 28.

8. Taxi Transport Subsidy Scheme (TTSS)

Recommendation 3: PDCN seeks the support of IPART:

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

PDCN proposes that the level of TTSS be increased from 50% of the taxi fare to 75% and that the upper limit of the subsidy be increased from its current \$30 to \$40. Increases in the subsidy are recommended due to the significant additional costs associated with having a disability. Passengers using WATS in Western Australia are already entitled to a subsidy of 75% with an upper limit of \$25.

PDCN understands that taxi fares in NSW are 22.3% higher than in the late 1990's. During the same period there has been no increase in the level of subsidy made available to people using support through the TTSS. It is well known that many of our contingency are on low, fixed incomes which have not kept pace with inflation. When the effects of the introduction of GST are included it is clear that for most people with physical disabilities there has been a drop in real income during the period when taxi fares have increased. Due to the significance of this issue, PDCN will continue to advocate for an increased level of subsidy.

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%³. The Legislative Council suggested an increase of five percentage points each year for five years to minimise any administrative complexities with these changes.

Many people with physical disabilities depend on WATS to attend essential health related appointments, educational, recreational and employment. Both the State and Commonwealth Governments encourage community participation and employment. For people seeking employment who can only use taxi travel, employment often becomes counter-productive due to the excessive costs of taxi travel.

Due to the large geographic size of the Greater Sydney Metropolitan area, the current maximum of only \$30 is inadequate for people needing to travel from the outer areas into the Sydney or for people living in rural NSW. Often many of these people experience some of the greatest financial difficulty of all groups who use taxi transport, and as a consequence PDCN recommends an increase of \$10 from \$30 to \$40.

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

Recommendation 4: PDCN urges IPART to ensure that information regarding performance standards for WATS to be made public.

PDCN understands that as part of obtaining accreditation, taxi networks are already required to submit quarterly reports to the NSW Ministry of Transport regarding their service delivery and performance⁴. A survey conducted by PDCN on WATS indicated that the response time for WATS was significantly

³ '*Making It Happen*' Final Report (NSW Parliament Legislative Council) Recommendation 12, page 29.

⁴ <http://www.transport.nsw.gov.au/taxi/networks.html>

greater in the following locations and far greater than that considered acceptable by the NSW Ministry of Transport:

- Newcastle;
- Northern Beaches of Sydney; and
- Liverpool/ Campbelltown/ Camden area.

Information on the following conditions need to be made public by the NSW Ministry of Transport so that our constituency have the confidence to continue to use the WATS service:

- Locality of pickup and drop-off;
- Time taken to conduct taxi trip; and
- Time of the day and day of the week.

Improvements in service delivery could be promoted further on the PDCN website.

10. Taxis that provide wheelchair access in country NSW

Recommendation 5: PDCN seeks the support of IPART to recommend to taxi networks in rural NSW to purchase a WAT as part of the regular taxi fleet, or additional WATS for larger rural towns.

Research conducted by PDCN has identified the following local government areas (LGA) in rural NSW as needing a WAT as part of the regular fleet for LGAs where a WAT is unavailable or otherwise additional WATS in larger rural towns where other modes of accessible public may not be available.

- Bathurst
- Broken Hill
- Clarence Valley
- Goulburn
- Maitland
- Nambucca Heads
- Newcastle
- Orange
- Parkes
- Queanbeyan
- Tweed
- Wollongong

11. Regulation of Taxi Drivers with WAT Plates

Recommendation 6: PDCN recommends that IPART advocates for increased regulation and monitoring to be introduced to ensure that passengers of WAT services receive an adequate service.

Currently NSW Ministry of Transport provides taxi networks with cheaper taxi plates to encourage taxi networks to purchase WATS, on the proviso that drivers of these vehicles provide an equitable taxi service to passengers of WATS. PDCN seeks the support of the Ministry of Transport to monitor services to ensure that these conditions are adhered to particularly in the localities identified in recommendation 4.

12. Existing subsidies provided by the Ministry of Transport

Recommendation 7: PDCN recommends that the NSW Ministry of Transport increases the current subsidies to the taxi transport providers and people with disabilities:

- a) \$1,000 to purchase a taxi plate to be used to transport wheelchair passengers;**
- b) Loan of \$30,000 available to taxi networks located in rural NSW;**
- c) That the taxi subsidy for TTSS holders to be increased from 50% to 75%; and**
- d) .That the maximum subsidy to be increased from \$30 to \$40 for TTSS holders.**

13. Performance Requirements

Recommendation 8: PDCN calls for the introduction of 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
24th April 2007

Appendix 1- Taxi Fares in NSW

The table below identifies taxi fares as from June 2006 taxi fares for the following areas of NSW: Metropolitan transport district, Newcastle transport district, Wollongong transport district, Blue Mountains local government area, Gosford local government area, Wyong local government area, Shellharbour local government area, Cams Wharf, Fern Bay, Minmi, Toronto, Williamtown, Medowie, Campvale, Ferodale, Raymond Terrace, Fassifern, Hexham, Maitland, Beresfield, Fullerton Cove, Tomago, Camden, Picton, Thirlmere, Tahmoor and Bargo.

Fall	\$2.90
Distance Rate	\$1.68 a kilometre.
Night-time Surcharge	A surcharge of 20% of the Distance Rate in respect of a journey commencing between 10 pm and 6 am daily.
Booking Fee	\$1.50
Waiting Time	\$43.30 an hour (72.17c a minute) while vehicle speed is less than 25.77 km/h.
Luggage Rates	No charge up to 25kg, then 10c for each subsequent 25 kg or part thereof. Maximum payable 55c.
Tolls	All road, bridge, ferry, tunnel and airport tolls that apply to the journey, and the return toll for a northbound journey over the Sydney Harbour Bridge or through the Sydney Harbour Tunnel.
Maxi-cabs	Except in the case of a multiple hiring, where 75% of the authorised fare applies, all the above maximum fares and charges apply only in the case of a maxi-cab hired from a taxi zone or hailed on the street to carry up to 5 passengers. For any other hiring (except a multiple hiring) up to 150% of the above maximum fares and charges may be charged.

Taxi fares charged in country NSW as from June 2006

Flag Fall	\$3.40
Distance Rate	Tariff 1 - \$1.73 a kilometre for the first 12 km Tariff 2 - \$2.43 a kilometre in excess of 12 km
Night-time Surcharge	A surcharge of 20% of the Distance Rate in respect of a journey commencing between 10 pm and 6 am daily
Holiday Surcharge	A surcharge of 20% of the Distance Rate in respect of any journey commencing between 6 a.m. and 10 p.m. on Sunday or a public holiday notified in the New South Wales Government Gazette.
Booking Fee	\$0.90
Waiting Time	\$42.75 an hour (71.25c a minute) while vehicle speed is less than 24.71 km/h.
Luggage Rates	No charge up to 25kg, then 10c for each subsequent 25kg or part thereof. Maximum payable 55c.
Tolls	All road, bridge, ferry, tunnel and airport tolls that apply to the journey, and the return toll for a northbound journey over the Sydney Harbour Bridge or through the Sydney Harbour Tunnel.
Maxi-cabs	Except in the case of a multiple hiring, where 75% of the authorised fare applies, all the above maximum fares and charges apply only in the case of a maxi-cab hired from a taxi zone or hailed on the street to carry up to 5 passengers. For any other hiring (except a multiple hiring) up to 150% of the above maximum fares and charges may be charged.

