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To: The Economic Regulation Authority
Western Australia

Re: Participation by School Bus Contractors in the Commercial Bus Charter Industry.

We wish to submit the following points for your consideration:

1. Non School-Related trips are a very small part of our work.
2. The only other vehicles available locally are:
 - a) Two small (20 and 22 adult seat) buses owned by the Donnybrook Taxi Company, the proprietor of which has no complaints about the few commercial trips we do. Much of his work involves providing "back-packers" with transport to and from local farms, at times of the day when our vehicles are fully occupied with school contracts.
 - b) An old bus (adapted to take wheelchairs and 17 passengers) owned by the local shire and hired on a "supply your own driver" basis. We were asked at short notice to supply a substitute bus for Donnybrook HACC to take pensioners to Bunbury when the shire notified HACC that this vehicle was not available to them that day.
3. The next nearest Commercial Charter Vehicles are based at Mullalyup and Bunbury. Any "commercial advantage" we have over these would not be due to our remuneration for school contract work, but because of the need for their operators to charge for the extra distances involved. A bus hired from Bunbury would have to travel at least an additional 60 kms to service passengers from Donnybrook.
4. We pay the Department for Planning and Infrastructure over \$300 p.a. for a Charter licence covering our two smaller buses, and \$20 per trip for a Temporary Omnibus Licence when we use either of our larger buses for commercial (non-school) trips.
5. Most of our extra work is with local sporting and community groups. We think that we are providing an important community service for organizations who do not wish their members to drink and drive when attending social occasions in nearby districts.
6. The local schools are dependent on School Bus contractors for cultural and sporting trips. We provide inexpensive transport to the local recreation centre for regular physical education lessons and in-term swimming lessons. As parents of two now adult daughters who did not have access to a swimming pool during their school days, we are proud of the many hours we worked to help get this facility in our town, and wish to continue supporting the recreation centre. We also transport students between primary and high school sites and school and local hall, free of charge, for such occasions as Anzac Ceremonies, Art Shows and School concerts. We provide free transport of pensioners to the annual Lions picnic each December. Until February 2006, we also provided a weekly free shopper bus to local shops for any residents who needed it. This service was originally subsidised by the largest local shop, but we continued it despite a new

store owner declining to assist with costs after the Transport Dept gave us written notice that we had to greatly increase our fee or we could be deemed to be in competition with taxis.

(We regard this as another example of Government getting in the way of common sense) Donnybrook HACC now look after any elderly residents who need help with their shopping.

7. In any industry, the owners of plant and equipment have to build all anticipated costs, such as vehicle replacement, repairs and maintenance, running costs, wages, superannuation, licences and insurance, employer's indemnity, administration etc into the charges made to their clients. The clients do not have the right to claim that they have ownership of the plant and/or equipment hired by them. They most certainly do not have the right to claim part of the operator's trade-in when the equipment is being replaced with new machines. Nor does any individual client have the authority to forbid the owners to use the said equipment to service other clients at times when the first client has no work available for the owner. The only exceptions to these rules seem to be in the conditions set down by the Public Transport Authority of W.A. in the new contracts for School Bus Services. When we bought our last new school bus, we had to pay more than \$4,000 of the \$18,000 trade-in from our old bus back to the P.T.A. As the purchase price of the new bus was about \$200,000 we needed every dollar we could find towards this, and really resented parting with money that should have been ours. This is one area in which we most certainly do not have a "Commercial Advantage".

8. The contractors make arrangements for financing vehicles at the time of purchase, while the P.T.A. spread the "Bus Replacement" payments to contractors over the life of the bus, which is 15 years for the larger buses and 10 years for the smaller "Coaster" ones. We do not believe the P.T.A. own our vehicles.

9. As the holiday pay for drivers does not cover all the school holidays, and our drivers are only employed for four hours per school day, the dozen or so charter trips per year are a welcome chance for them to supplement their incomes a little.

10. We trust this inquiry will not result in any restrictions on our transporting local people in locally owned vehicles driven by local drivers.

Yours faithfully,

For Leslie K. Combes and Eileen J. Combes