



Lyndon Rowe  
Chairman  
Economic Regulation Authority  
GPO Box 8469  
PERTH BUSINESS CENTRE WA 6849

Dear Sir,

**Re: INQUIRY ON SCHOOL BUS OPERATORS CHARTER BUS OPERATIONS**

Thank you for the opportunity to make comment on the above enquiry, we apologise that this response has not been timely.

Our comments are:-

(1) We are purely a Charter Operator with no Government Contracts and we feel we are disadvantaged in this Forum in that we are in the minority. We are disappointed advices received that the original complainants were possibly in a similar business structure to ourselves but have elected not to participate in the submissions at this point in time.

(2) We have no issue with School Bus Operators being involved in the day-to-day shuttle service of the schools (i.e. pool to school etc) and in fact they are essential for this type of service to meet the demand.

Whilst we operate mainly in the long-distance charter we are definitely at a disadvantage even in the school shuttle arena as our Omnibus Licence states clearly we must charge an hourly rate of \$85.00 for the first two hours and then \$60.00 per hour for each additional hour. This stipulation appears not to apply to the school bus operators.

(3) We are aware that school bus operators charge a similar rate to ourselves when chartered for long distance work, however, we effectively make considerably less profit when we need to cover our own overheads and cannot rely on a Government Contract to alleviate some of these costs.

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*Owner / Operators with 22 years Experience*

As regard the service quality and reliability in the industry, we have read the public submissions and take offence to the comment that School Bus Operators who have been supplied with new seat belted buses are in a better position to provide a safe journey for their passengers.

We personally have chosen to purchase reliable vehicles, one of which is fully seat belted and under the terms of our Operators Licence, our vehicles are checked over mechanically every three months and have a full 'pit inspection' before they are permitted to be relicensed each year.

We adhere closely to our vehicle maintenance and fatigue management programmes which were an essential requirement before we were granted permission to commence our business.

Our personal experience comes from the following situations -

- . our own children used the free contract school system;
- . our own children used the RPT system (subsidised user pays);
- . we have been drivers of vehicles in both of the above systems; and
- . we have also been Managers/Administrators of a local PTA controlled RPT system.

We have the following suggestions in regard to the flow-on effect if the Service Charge Model were to be amended.

We have been privileged in the past to have made the acquaintance and in turn have made good friends with some of the School Bus Operators. We believe that they have been subjected to enough difficulty in the past and have experienced a lot of uncertainty in what was, in a lot of cases, their life investment and superannuation for their retirement.

Our perception is that they are not adequately remunerated and if this was to be reviewed then perhaps their desire/need to supplement their personal income with extra charter work would not be necessary.

There have, over the years, been long ongoing disagreements with regard to all children paying the minimum 50c charge for their ride to school with many arguments for and against this issue.

This matter has to be addressed in fairness to inner city children / parents once and for all and whilst there may be some extra accountability for the School Bus Operators to collect and submit evidence of their daily numbers and takings (as per the RPT model) these funds could then be held by the School Bus Operators to supplement their contract payments.

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Further to the Public Submissions, we concur with Ray Gannaway's comment of all School Bus Operators that undertake Charter Work should hold a Tour & Charter Licence for the same reasons quoted.

We also concur with the MTA WA comments regarding Community Based Buses and strongly recommend that an enquiry be held to investigate their lack of Duty of Care and the unfair advantage in the market.

We hope that the above clarifies our personal views and position in this matter and we thank you once again for the opportunity to participate in this Forum.

Yours sincerely,

Juliette Hayward & Ian Knight  
Geraldton Coach Lines

Saturday, 16 June 2007

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