

Dear Economic Regulation Authority of Western Australia

Please see below comments made on behalf of the WA Country Taxi Operators Association with regards to the Draft Report in relation to the Taxi Industry.

The ERA paper is very incorrect in noting that the Metropolitan and Regional Taxis operate in ways that are “broadly similar”. In fact there are numerous differences in terms of the legislation they operate under and the actual management of country taxi plates, driver training and the overall income derived from country taxi plates. Due to continued significant increases in fuel, insurance and general maintenance costs many operators in regional areas of WA are struggling. In fact in towns such as Port Hedland, Karratha etc it is very difficult to recruit and retain Taxi Drivers due to ongoing high costs of living and mining income downturns in these areas. Although taxis provide a vital service in these areas, some of which do not have public transport available, (reducing drink driving, disabled and elderly transport provision) they are often marginal businesses in terms of driver and operator incomes.

In regional areas taxi drivers and operators receive very little assistance in terms of driver safety. The Transport Officers in many towns have larger roles and less support staff than in the Metropolitan area and therefore have significantly less time to focus on taxi issues. Unlike the metropolitan area there is no requirement to have cameras installed in vehicles and despite lobbying for over 7 years and the previous Transport Minister Troy Buswell giving a “promise” to begin a project to provide financial assistance for the installation of cameras in regional taxis this has not been commenced. There is also often limited Police support for Taxi Drivers and Operators (in part due to lack of evidence because of inability to provide camera footage of incidents etc) with fare evasion, driver assaults and vehicle damage also attributing to increased operating costs and inability to recruit and retain taxi drivers for regional taxi services.

The quality of taxi services in the majority of regional areas (with populations large enough to make a taxi service viable) is excellent as it is usually a personalised service provided by the owner of the plates who operates and coordinates the plate(s). In most larger regional towns companies or cooperatives manage the taxi service 24/7 often working together to balance the demand for taxis with the viability of income for the taxi drivers on a shift by shift basis so they can retain the taxi drivers. The management of country taxi plates is very time/labour intensive in order to provide a 24/7 service. Many country taxi plate owners do everything from fleet management, driver training, complaints management, dispatching and even taxi driving themselves to ensure their business remains profitable. It doesn't take a lot for these small operators to lose their profit margins and become unviable. In fact, in larger regional cities and towns the Cooperatives/Companies often manage the quality of taxi service provided through their own policies, regulations etc as there is often limited Dept Transport personnel available to monitor taxis. These valuable cooperatives would cease to exist if deregulation of taxi plates occurred in regional areas and this would definitely have a major impact on the quality of the taxi service provided or even if one was able to continue. Despite the focus and concern by the Dept Transport over competition creating better taxi services, in fact in many regional area economies of scale actually have a greater impact.....6

individuals operating taxis independently will often provide a lesser passenger service than 6 taxi plate owners operating together (maybe sharing a dispatch service, vehicle repairs etc) to ensure that all jobs are covered and there are always vehicles available 24/7.

With the uptake of electronic dispatch systems in most larger regional areas in WA taxi service provision to the public can be more easily monitored and the three yearly regional taxi reviews can be undertaken with a much more realistic approach using data, rather than hearsay surveys to ensure that services are adequate for the area. In a smaller regional centres the current ad hoc method of releasing extra taxi plates can destroy a towns taxi service altogether as taxi drivers and operators will leave the industry if they cannot make an income that allows them to remain in the town.

Whilst there is always room for improvement in terms of the provision of taxi services in regional areas there should be a comprehensive review of the level of taxi service that is currently provided in country areas and whether this suits the community prior to making significant changes which could potentially destroy what regional areas presently have and perhaps leave them with no taxi service at all which is even more problematic if the town has no public transport service in place either.

Please contact me if you need any further details and/or to discuss.

Regards

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WA Country Taxi Operators Association- WACTOA (Secretary/Treasurer)



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