



NSW Hire Car Association

Response to the NSW Government Point-to-Point Transport Task Force Discussion Paper

24 September 2015

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INTRODUCTION

The NSW Hire Car Association (NSW HCA) is a recently formed association of hire car operators in NSW. In a short few months we have been able to secure substantial membership to formalise representations which individual operators have been attempting to make on behalf of the industry for several years now.

In the past weeks NSW HCA Directors have met with members, industry stakeholders and government representatives at both state and federal levels to present our views on the dangers of unregulated ridesharing, the imperative need for new regulation and in the meantime urgent enforcement of compliance to the current laws of NSW. We have submitted a number of papers which are attached to this Response by way of the Appendices.

In summary we are aligned with the NSW Government Point-to-Point Taskforce as follows:

The NSW HCA understands that *We are changing*¹. Australian consumer choices are being significantly impacted by a number of dramatic global shifts. These global shifts are influenced by four fundamental changes²:

1. Emerging technology – especially the accelerated rate of change of technology and instant access benefits shaping changing expectations towards retail and service delivery suppliers.
2. Data aggregation – particularly targeted application of user relevant information.
3. Demographic shifts – leading to changing social attitudes and also changing human interactions through the increasing acceptance of digital profiles and the associated digital trust framework.
4. Economic shifts – where the increasing pressure of the high cost of living especially in growing city metropolis areas are forcing consumers to demand cost effective alternatives without quality compromises.

All the above clearly point to the inescapable fact that consumers will no longer accept outdated methods of product or service delivery and expect governments and suppliers to move with the times. Reform is therefore essential in the point-to-point transport industry in order to meet not only current customer expectations but to stay ahead of evolving customer aspirations.

The NSW HCA also understands that *Technology is changing*³. The movement towards mobile technology and advanced, multi-tasking hand held devices has forever changed our world. The ability of a consumer to have information and access to products and services at their fingertips is the new normal. There cannot be a sensible debate about whether we need to embrace emerging technology. We must. It is that simple.

The NSW HCA also fully understands the “disruption” model and what is required to “disrupt” a well-established, highly regulated industry such as the global taxi industry.

¹ NSW Government Point-to-Point Taskforce Discussion Paper, p8

² PWC – The Future of Work, A Journey to 2022

³ NSW Government Point-to-Point Taskforce Discussion Paper, p8

But, having said the above and being in complete agreement that *The regulatory framework must change*⁴, we feel it is imperative that the regulatory framework is changed with the following in mind:

1. Public safety remains the highest priority for point-to-point transport
2. Special needs consumers do not become marginalised
3. The new framework ensures a level playing field for all industry participants
4. MOST importantly that there be a readiness for the NSW Government to enforce the new regulatory framework to the letter of the law for all industry participants – WITHOUT EXCEPTION.

The NSW HCA feels that the NSW government has failed in its duty of care to administer the law in the NSW point-to-point transport industry over the past 3 years, and has failed to do so on 2 primary levels:

1. The first example is the use of mobile-device based, GPS-powered metered fare calculators by some hire car operators such as Uber. This is clearly an illegal practice according to the current Transport laws of NSW. Uber has been able to circumnavigate this law due to a technical wording of the law around “fixing” of the metered device. This is viewed by existing NSW hire car operators as a gross negligence of enforcement duty on behalf of the government of NSW and all associated enforcement stakeholders. It is not acceptable that the government in NSW be rendered ineffective by the force and monetary might of a large multinational organisation that is backed by international power brokers. It is the expectation of citizens and operators in this state and country that we be protected from unlawful conduct by our governments and enforcement agencies. The NSW HCA views this as a significant failing on the part of the NSW Government.
2. The second example is the introduction of “ride sharing” in NSW and across Australia. Again, this is an illegal practice according to the current laws of NSW and the NSW Government has completely failed to curb this illegal practice in advance of changing regulation to meet new industry and consumer expectations. The NSW HCA again feels that our industry has been shaken and taken advantage of by a powerful multinational without any protection from the NSW Government and associated enforcement agencies. This has raised genuine fears about the NSW and Federal governments’ ability to enforce the law and protect its citizens. Everyone is watching this space very closely to see how the new regulatory framework will be implemented and how compliance will be enforced.

Despite substantial disappointment we remain hopeful that through the good work of the Taskforce under the leadership of Professor Gary Sturgess we might arrive at a level playing field that is equitable for all industry participants, safe for all segments of the public and which will help create a sustainable point-to-point transport industry in NSW well into the future.

We thank the Taskforce for the opportunity to respond to the discussion paper. We have chosen to respond only to discussion points related to the hire car industry as we feel other industry participants would be best suited to respond on their own behalf.

Thank you in advance for your consideration of our responses and we look forward to your recommendations to the NSW Minister of Transport, the Hon Andrew Constance in the very near future.

Should you have any questions in relation to this submission please contact John Bartolotta, Chairman (0411 699 888) or Ritta Khoury, Director Industry Relations (0421 339 959).

⁴NSW Government Point-to-Point Taskforce Discussion Paper, p9

RESPONSE TO DISCUSSION POINTS

Discussion point 1

The taskforce seeks comment on what steps could be taken to make taxi drivers' income more sustainable.

No response. This is best addressed by the taxi industry.

Discussion point 2

Given the inconsistent application of network authorisation requirements across NSW, the taskforce seeks comment on whether the requirement for a network to be authorised is necessary at all, let alone meet complex application requirements before being able to operate, particularly in regional areas.

No response. This is best addressed by the taxi industry.

Discussion point 3

The taskforce is interested in views around alternatives to the universal service obligation on the taxi industry which could improve access to services for customers.

Could alternative approaches meet the objectives of universal service in a more effective way?

No response. This is best addressed by the taxi industry.

Discussion point 4

The taskforce invites comment on current government initiatives to encourage the availability of wheelchair-accessible vehicles.

How could these be more effective?

No response. This is best addressed by the taxi industry.

Discussion point 5

Should ridesharing services be regulated? If so, how? Is there any need to distinguish them from other booked services?

The taskforce seeks comment as to how the regulatory framework could be simplified so that point to point transport providers have more flexibility about how they provide services. Should there be fewer restrictions as to how they operate?

The NSW HCA believes that the government of NSW is faced with the enormous responsibility of ensuring the new regulatory framework is carefully considered to create a sustainable industry well into the future. **The cornerstone of this new regulatory framework will be the introduction of a new low cost class of point-to-point transport with the correct regulations and governance that will ensure public safety.**

Given the public uptake of ridesharing, we do not believe that absorbing “ridesharing” into the current framework will be acceptable to the public or feasible. The NSW HCA believes it is imperative that “ridesharing” is regulated as a new class of service in a proper and sustainable way with the primary objective of ensuring public safety.

There are substantial dangerous implications for no/low regulations around this new method of transport. These dangers are outlined in our Position Paper and summarised in the Position Summary Sheet, refer Appendix 1 & 2.

The NSW HCA believes that making “ride sharing” safe will best be achieved through the introduction of a new class of service with its own specific requirements.

This new class of service needs to be indicated with a new label other than the name “ridesharing”. We feel the name “ridesharing” name is misleading and deceptive as it better describes “car-pooling” and is confusing to consumers who may not understand the transaction they are entering into. There is a vast amount of literature on the internet on the incorrect naming and classification of “ridesharing” and we are confident that the Taskforce is well across this literature.

This new class of service is a commercial transaction between a consumer and a supplier and needs proper semantics that adequately describe the service being delivered.

Other governments around the world who have introduced regulations around this service have been active in addressing this naming discrepancy. For example, the state of California, USA, was one of the first governments globally to regulate “ridesharing” and address the naming discrepancy⁵:



⁵ <http://www.forbes.com/sites/tomiogeron/2013/09/19/california-becomes-first-state-to-regulate-ridesharing-services-lyft-sidecar-uberx/>

Our recommendations of regulations for this new low-cost service are outline in Table 1 below.

Table 1: NSW HCA recommendations of regulations for a new *low cost class of service**

* currently known as ride sharing

Driver Accreditation	Drivers must be formally accredited as per the current industry standards to ensure the driver is medically fit for the service to be provided and has no criminal history which is established through an independent criminal history check.
Vehicle Registration	We recommend vehicles must be registered to provide this new service and that a registration fee of AUD2, 000.00 per annum be applied in order to secure a licence to provide such services in a private vehicle.
Vehicle Identification	On successful registration and driver accreditation, we recommend permanent official stickers be required to be displayed on the windscreen and back window to easily identify the vehicle as providing such service before drivers can commence providing such service.
Blood Alcohol Limit	We recommend that driver providing this new class of service be required to have a blood alcohol concentration limit of 0.02 ⁶ as currently applicable to taxi and hire car drivers. This is imperative to ensuring driver, passenger and general public safety.
Minimum Age	We recommend that drivers providing this new class of service must have minimum age requirements of 20 years as currently with taxi and hire car drivers. This ensures that the driver is of a responsible age and able to make common sense decisions during the course of the service provision.
Insurance	We recommend that driver be required to have insurance coverage for provision of this type of service in their private vehicle registered for such services. A number of Insurance providers in NSW have already confirmed the consideration and imminent introduction of a new class of insurance specifically created for this new class of point-to-point transport.
No Use of Bus Lanes	We recommend that as providers of this class of service do not offer a full time professional service with associated overheads that they be strictly prohibited from using Bus Lanes. Bus lanes should remain for the use of Buses, Taxis and Hire Cars who pay the Government of NSW a premium to do so.
No Pre Booking	We recommend that this new class of service not be allowed to accept pre-bookings and be restricted to providing on-demand services. Hire cars pay a premium in order to be able to accept pre-bookings and without this differentiation there would be no grounds for a premium licence fee for hire car operators.
Applications of GST	We believe that this class of service should be compliant with administration of goods and services taxes as currently applied to the industry.
Declaration of Income & Payment Taxes	We believe that drivers delivering this new class of service should be subject to the full extent of the law in relation to declaring income and paying appropriate taxes.
No Extra Demerit Point	As drivers of the new class of service are, by their own admission and by the admission of the company who provides their work, not meant to earn a primary living from this trade they should not be allowed to submit for an extra demerit point in the event that that they lose their license.

⁶ NSW Government Point-to-point Taskforce Discussion Paper, p.22

Regarding regulations for hire cars, the NSW HCA is of the view that the state of NSW is at the leading edge of practices for the hire car industry. Following deregulation in 2001 we feel the industry has evolved into a Perfect Market⁷ where supply and demand have reached a relative equilibrium and where prices have also stabilised and are generally meeting consumer expectations for a premium service.

The NSW HCA believes that the current regulations governing the use of chauffeured hire cars in NSW are generally fair and equitable - with the exception of a few changes we would like to see which would allow our industry to compete more equitably in the changed landscape.

Recommendation for changes relating to hire cars are outlined in Table 2.

Table 2: NSW HCA recommendations for changes to existing hire car regulations

<p>Regional Restrictions Removal</p>	<p>We recommend the removal of restrictions recently implemented in regional NSW:</p> <ol style="list-style-type: none"> 1. Min pre-booking time of 30min 2. No signage on HC plated vehicles <p>We believe these measures have been implemented in a bid to curtail the non-compliant conduct of some regional hire car operators who were allegedly conducting illegal “rank and hail” activities. However, we believe these measures have substantially impacted genuine and compliant hire car operators who have never broken any transport laws.</p> <p>It is not acceptable to create laws to police the minority non-compliant operators which have a wider bearing on the industry.</p> <p>We recommend that hire car operators be allowed to fulfil on-demand bookings within the definition of hire car services as outlined in the transport act and that this be coupled with strong non-compliance measures.</p> <p>Further, we recommend there should be more extreme and severe consequences in cases where there is proven non-compliance such as loss of license and confiscation of vehicles for any hire car operator found to be breaking the law in regards to “rank and hail” activities in regional or other locations. We feel this should also be the case for other non-compliant activities such as solicitation or “touting” at airports and other public venues. The establishment and enforcement of such strong measures would greatly reduce non-compliance in our views.</p>
<p>Reduction of Licence Fees</p>	<p>We recommend that the current HC plate license fees be reduced to AUD4, 000.00 per annum.</p> <p>The previous levels were set in 2001 following deregulation of the hire car industry. Current operators cannot see how the government can justify such license fees as the only benefit provided from the HC plate is the ability to use the bus lanes. Given the current transport infrastructure in NSW we believe \$8,000 per annum is an inflated figure to pay for minimum benefits resulting from the HC plate. If relief is not provided in this area we suspect that many HC operators will simply secure a license in the lower class of service and the government will eventually see the erosion of this premium class of service.</p>
<p>Use of Loading Zones</p>	<p>We recommend that hire cars and other point-to-point transport classes be granted access to use loading zones and other similar zones to pick up and drop off passengers.</p> <p>Currently it seems unfair that couriers are allowed to use such zones to pick up and drop of parcels while our industry is prohibited from using such zones to pick up and drop of passengers. The pickup and drop off of passengers is a very quick process that usually takes only seconds and would greatly be streamlined, especially in the inner city areas, by the ability to use such zones. This would also improve traffic flow and passenger safety in peak hours and in congested areas.</p>

⁷ <http://www.businessdictionary.com/definition/perfect-competition.html>

Remove Vehicle Type Restrictions	<p>We recommend the vehicle type restrictions be removed. The provision of different types of vehicles which will affect the pricing options available to consumers is an important part of expanding services to meet customer needs in the hire car space.</p> <p>While we fully support vehicle standards regulations to be maintained we do not believe that the type of vehicle delivers any benefit or guarantee of service to consumers.</p> <p>Ultimately hire car operators will find suitable niche markets which they wish to pursue and the ability to provide particular vehicle types commensurate with that service is reasonable to expect.</p>
Special Privacy Service	<p>We recommend that the new regulation formalise the option to provide point-to-point transport in registered but unmarked vehicles as incidental to the provision of other services such as personal security or VIP transport services. Many clients require point-to-point transport but do not wish to travel in marked vehicles for security or privacy reasons. It is reasonable to expect that operators providing such niche services would have such flexibility to do so as per their customer needs.</p>

Discussion point 6

The above rules are applied differently to different types of point to point transport drivers. How could these requirements be better applied?

The NSW HCA is of the view that the discretionary application of rules relating to the *regulations of drivers for safety* is potentially confusing and difficult to enforce.

We would support standardisation of these rules across the industry for all point-to-point transport drivers, with the exception of extra demerit points which should not be allowed for “ridesharing” drivers. Our view on demerit points is outlined in our response to discussion point 5, in Table 1.

Discussion point 7

The taskforce seeks comment on whether the Government’s current safety standards for public passenger drivers are reasonable.

Also, how could the processes for enforcing these standards be improved? Are there alternatives to the current system that could work more efficiently and effectively?

It is outside the scope of our response to provide comment on the suitability of the current safety standards for all classes of public passenger drivers across the broader industry.

However, the NSW HCA would like to make the following observations:

1. It would be unacceptable and dangerous to public safety to allow any organisation for any class of service to self-administer driver background checks or accreditation. This is clearly a conflict of interest and can give rise to misuse of power in order to cut costs associated with such practices and shorten the time from driver application to generation of income for the supply organisations (hire car, taxi or “ride share”).
2. For companies who can demonstrate implementation of a driver rating mechanism, we feel that once an initial driver accreditation is achieved it would be reasonable to expect that

renewal not be necessary, except for change of circumstances. The ongoing trip-by-trip rating of drivers by customers should provide a powerful incentive for drivers to pursue service excellence and maintain vehicle standards.

This clearly could not be the case for companies who do not have mobile technology with demonstrable driver and vehicle rating mechanisms.

3. It would be reasonable to expect that the government may wish to privatise the driver accreditation process and the NSW HCA would not be against that process, provided the appointed agencies have strict guidelines to ensure impartiality and guard against corruption.
4. Given that driver authorities are occupational licenses it would be expected that there remains an appeal mechanism under the new regulation in the event of refusal, cancellation or suspension of driver authority.

Discussion point 8

Are there ways that the registration regime could be streamlined for point to point transport providers?

The current vehicle registration process is unnecessarily complex and not streamlined. There is substantial room to improve the current process although the full details of such improvement are outside the scope of consideration of this response. However, the NSW HCA would like to make the following observations:

The NSW HCA would welcome a simplification of the processes and removal of unnecessary red tape in order to facilitate efficient business practices and eliminate work vehicles being off the road for extended periods of time while waiting for complex paperwork processes.

In addition to a simplified process the single location of Parramatta is not sustainable and is exacerbating the issues.

The NSW HCA strongly recommends the NSW Government consider opening of another vehicle registration office within the vicinity of the airport which is a high frequency destination for all point-to-point transport operators and which would make the vehicle registration process much easier and reduce the amount of time working vehicles need to be off the road.

Discussion point 9

It seems to the taskforce that, given the anonymity of rank and hail transport, the ability to clearly identify a taxi is important, as well as having some assurance that the vehicle is being monitored remotely. Knowing that there is a visual and electronic record not only helps to resolve matters after the event, but assists in suppressing incidents beforehand.

Having this security equipment uniquely associated with the vehicle (rather than with the driver or customer only) does appear to mitigate risks around handheld devices (such as smartphones) being switched off or stolen.

However, the current detailed, prescriptive requirements relating to the equipment and how and by whom it is to be handled, adds expense for the owner of the taxi.

The taskforce invites comment on whether the current safety and security requirements for taxis are appropriate and whether there are alternative models for how safety outcomes can be achieved.

No response. This is best addressed by the taxi industry.

Discussion point 10

The differing and sometimes quite complex additional requirements placed on the operators of different service types make it harder for them to compete effectively.

The taskforce is aware that in its recent reforms, Victoria greatly simplified the requirements for operator accreditation applicants⁶⁰. For example, applicants for taxi operator accreditation and hire car licensing are now only required to provide evidence of their identity and are subject to a criminal history check. Once accredited, operators have ongoing requirements relating to vehicle safety and working equipment.

The taskforce is interested in views on appropriate safety standards for point to point transport vehicles and how these standards may best be achieved.

For example, are there any requirements beyond roadworthiness you think are necessary?

The NSW HCA does not have any issues with the current process but welcomes any changes that may simplify and standardise this process. It is also our opinion that regulations need to apply equally to all classes of service within point-to-point transport.

Discussion point 11

The taskforce is interested in comment on insurance arrangements for point to point transport providers. How could they be improved?

For example, are there alternatives to the way vehicles are currently classified for CTP insurance?

Is it necessary to specify a minimum level of coverage for third party property insurance?

The NSW HCA is of the view that insurance requirements need to be applied equally to all industry participants and all classes of service. Insurance premiums in relation to using a vehicle commercially for passenger transport are applied for reasons of protecting the driver, passenger and the public and need to be equally applied in all instances of passenger transport.

The hire car industry would not look favourably on insurances that would be perceived to be loosely created as a token cover for new classes of service and which were not commensurate with the levels of insurance currently required for hire car operators and other industry suppliers.

Discussion point 12

Customer satisfaction with fares is low. Customers perceive fares as too high and have low levels of trust in the correct amount being charged.

Could fare regulation be simplified for the benefit of customers?

Do you have any other suggestions about how information to customers could be improved?

The NSW HCA does not believe this comment is true for hire car services. Most hire car companies within Australia generally publish their fares and extras to their customers in advance of the trip being taken. With the exception of surge pricing introduced by Uber, hire car customers expect to pay certain rates for premium services and fares are usually agreed in advance.

The NSW HCA feels that the surge pricing mechanism adopted by Uber, although requires the customer to accept the fare multiplier, is open to misuse. **We would strongly recommend that the Taskforce carefully consider surge pricing and consider capping the degree of multiplication that is allowed in order to protect consumers.** There is extensive literature on the internet discussing surge pricing, manipulation of surge pricing and the potential impact on consumers. We are certain that the Taskforce is well across this literature and will consider the dangers when crafting the final recommendations to the NSW Government.

Discussion point 13

Given the apparent customer dissatisfaction and confusion about taxi fares, it is understandable that some regulators are moving to amend meter standards to provide better clarity for customers. All the same, the taskforce's terms of reference highlight a need to lower the burden of regulation on the industry.

The taskforce seeks comment as to whether there should be any changes to the way fares and meters are regulated, and whether new technologies offer new opportunities at a relatively low cost to industry.

In relation to taxi fares we have no response. This is best addressed by the taxi industry.

In relation to fares in general the NSW HCA feels it is reasonable to expect the new regulations to be equally applicable to all industry participants.

In the introduction we outlined our view that one of the key failures of the NSW Government was appropriate action around the illegal practice of mobile-device based metered fare calculators such as used by Uber. These devices calculate fares using a combination of time and distance parameters, which according to the current laws within NSW is illegal for any transport operator other than a taxi.

We anticipate the new regulation will clearly articulate what is acceptable in relation to calculation of fares for various classes of service and then strict enforcement of compliance to the new regulations, whatever they may be.

The hire car industry will not look favourably on any ambiguity in this area and we respectfully ask the Taskforce to give this space careful consideration.

Discussion point 14

The current prescriptive regulatory requirements aimed at ensuring service quality place additional costs on operators and drivers, particularly in the taxi industry. Should service quality be subject to regulation? Are there alternative ways to ensure service quality for point to point transport customers?

The NSW HCA is of the view that service quality should be self-regulated which will ensure the pursuit of service excellence and the success of suppliers who are able to consistently deliver service excellence and therefore differentiate themselves from other competitors.

Discussion point 15

Should the government manage the supply of taxi services? If so, how should they be restricted (for example, through a cap on the number of taxis allowed to operate)? Should there be different arrangements outside Sydney?

No response. This is best addressed by the taxi industry.

Discussion point 16

Should there be any restrictions on where taxis can operate? If so, how many taxi and hire car operating areas are required across NSW and why? What are the options for broader operating zones?

The NSW HCA believes that the current operating areas for hire cars are sufficient requiring metro license and regional license with regional licenses being half cost of metro licenses. We have no further contributions on this matter at this time.

Discussion point 17

Should the Government manage the supply of hire car services? If so, on what basis?

As stated on page 38 of the Discussion Paper, The NSW Government currently does not place any limits on the number of hire cars in both Sydney and Regional areas, but Government pricing policy on licences may limit supply.

The NSW HCA is of the view that this practice is working well and following the deregulation of the hire car industry in 2001 has helped to create a "perfect market" equilibrium. Within this perfect competitive marketplace supply has been elastic in meeting demand. We think it is reasonable to expect that nothing will change in this regard.

Discussion point 18

At this stage, it is too early for the taskforce to say what the likely impact of any change would be, so detailed consideration of any possible adjustment package is not possible.

Nonetheless, the taskforce invites comment on whether industry adjustment assistance should be considered, and if so, how it might be structured.

The NSW HCA believes that substantial reform will emerge from the recommendations made by the Taskforce to the NSW Government and that reform will most likely see the introduction of a new class of point-to-point transport – the low cost service currently called “ride sharing”.

We believe that the government has failed in its responsibility to enforce compliance of the current NSW Transport laws. Notwithstanding that we understand the disruption model and that acting unlawfully is a strategic tool within the disruptive framework, a new entrant has been allowed to introduce a new class of service which is outside the laws of NSW and to operate that service without obstruction since April 2014.

It is reasonable that the citizens and operators within NSW should expect the NSW Government to uphold the law and protect our livelihood and the investment made legitimately in good faith based on the current laws of the State.

Therefore it is our view that an adjustment package is critical to the smooth facilitation and introduction of the new regulatory framework for point-to-point transport and we recommend the following structure outlined in Table 3

Table 3: NSW HCA Recommended Adjustment Package Structure

Category	Compensation Structure	Per Vehicle Adjustment*
Hire car plates issued after 2001 and prior to April 2014	50% refund on the license fee of \$8,000 per annum over 13 years.	\$52,000
Hire car plates issued after April 2014	None	\$0

*Figure is calculated for HC plates issued in 2001. This figure will need to be pro-rated for HC plates issued after 2001.

The NSW HCA believes that many hire cars which came into the market after April 2014 where licensed by the owner/operator in an environment where they fully understood the changing landscape and made a decision to invest regardless. We feel it would be reasonable to exclude this category of owner/operators from the adjustment package.

It is also our view that the adjustment package should be exempt from income tax for all recipients regardless of the total sum of the adjustment package and regardless of whether the recipient is an individual operator or a company level operator.

APPENDIX 1

NSW Hire Car Association Position Paper - Dangers of Unregulated Ridesharing

See separate attachment.

APPENDIX 2

NSW Hire Car Association Position Summary – Dangers of Unregulated Ridesharing

See separate attachment.

APPENDIX 3

**NSW Hire Car Association, A Framework for Tomorrow -
A View of reform and regulation towards a sustainable point-to-point transport industry**

See separate attachment.