



Mr Chris Lock  
A/Director General  
Transport for NSW  
PO Box K659  
HAYMARKET, NSW 1240

Dear Mr Lock

**Passenger Transport Amendment (Taxi-Cab Information) Regulation 2011  
Collection of Taxi Licence Lease and Other Notifiable Transaction Values**

I refer to your letter of 19 December 2012 seeking comments on proposed amendments to Clause 184 of the *Passenger Transport Regulation 2007* that would allow the collection of notifiable taxi licence transaction terms and values such as leases and sub-leases. The NSW Disability Council ("the Council") welcomes the opportunity to review and comment upon these proposed amendments

The Council is an advisory body comprising members who have experience, expertise and knowledge of issues affecting people with disability, their families and carers. Most of the members are people with personal experience of disability.

The Council is of the opinion that any amendments to the *Passenger Transport Regulation 2007* should include a greater focus on the collection of data relating to Wheelchair Accessible Taxis (WAT). More specifically, data collected should include the following:

- Is the vehicle owner driver operated or sub-leased?
- Is the vehicle a Wheelchair Accessible Taxi (WAT)?
- What was the actual plate cost of the Taxi?
- The type and age of the vehicle (noting that a WAT has twice the lifespan of a standard Taxi)
- How many WAT subsidy jobs (M50) were completed in the previous 12 month period?
- How many non WAT subsidy jobs (M40) were completed in the previous 12 month period?
- The operating region/distribution of WAT licences.

Despite the unrestricted availability of WAT taxi licences and reduced licence costs when compared to other Taxi licence classes, the number of WAT licences remains drastically short of passenger demand.

The Disability Council suspects that this is due to the desire by the Taxi industry and Taxi Council to limit the overall number of licences which compete for fares, since some proportion of WAT taxi jobs are for able bodied passengers. Such data would assist in resolving this issue ahead of the Governments predicted growth in numbers of disabled passengers.

Such information would also help clarify the relative cost/value relationship of a WAT compared to the actual plate costs of these vehicles. It appears that the conversion costs alone do not provide a true indication of the actual costs of a WAT. Additional information could also lessen the potential of misinformation relating to the cost of WAT within the industry.

If you require further information, please contact Ms Melinda Savvides, Executive Officer, NSW Disability Council on (02) 8217 2809 or [melinda.savvides@facs.nsw.gov.au](mailto:melinda.savvides@facs.nsw.gov.au).

Kind Regards

A handwritten signature in black ink, appearing to read 'Cain Beckett', with a stylized flourish at the end.

Cain Beckett  
**Chair, NSW Disability Council**