

Mr Jonathan Roberts
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Re: Fare review for unbooked commercial passenger vehicle services: consultation paper

Dear Mr Roberts,

Thank you for the opportunity to contribute to the Essential Services Commission's (ESC's) 2018 review of fares for unbooked commercial passenger vehicle services. I am pleased that the ESC intends to consider the needs of both passengers and service providers in promoting the efficient provision and use of applicable services, and that this extends to allowing for innovation in the industry and provision of a range of services.

I support the inclusion in this project of a review of fare structure. The Taxi Services Commission (TSC) would like to suggest that a simpler, more flexible fare structure could facilitate innovation and efficiency in the industry, ultimately leading to better market outcomes. In the opinion of the TSC, continuation of point-in-time speed-based fare determination may be overly-prescriptive, and serve as a barrier to competition and innovation: both in fare calculation devices used, and flowing into the broader industry. One potential improvement could be maximum time and distance charges; similar to the current structure, but based on overall trip features, not point-in-time speeds.

If it were the case that some industry participants prefer to retain existing tariffs, the TSC considers that it would still be possible to provide a simplified maximum fare structure that could afford a range of specific, provider-determined tariffs within that maximum, with participants able to select an approach that is appropriate in the context of their metering technology and service offerings. The TSC considers that the ESC's fare structure should be possible to implement using existing fare calculation technologies, but should be flexible enough to allow various implementation approaches. It should focus on broad market outcomes, rather than pre-empting specific technologies and modes of operation.

The TSC supports ESC's role in promotion of efficiency in the market for unbooked commercial passenger vehicle services, and hopes that this can be achieved through a fare determination that is flexible enough to allow for a range of services and fair competition industry-wide.

The TSC is committed to assisting the ESC with its work for this fare review, including providing relevant data to assess market outcomes. If you have any questions regarding this submission, or would like further assistance, please contact [REDACTED] Director Strategy & Innovation on [REDACTED]

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A de Rozario', with a long, sweeping horizontal line extending to the right.

Aaron de Rozario
Chief Executive Officer
Taxi Services Commission