ABN 64 449 386 822 A.C.N. 006 067 563 556 BALLARAT ROAD., SUNSHINE. VIC. 3020 PH: 9311 8111

13 June 2013

Submissions to the Tow Truck Review Essential Services Commission Level 37, 2 Lonsdale Street Melbourne VIC 3000

Dear Mr Nick Hague,

Thank-you for the opportunity in which to respond to the ESC Periodic Review of Accident Towing and Storage Fees 'draft report' May 2013; specific to 5 draft recommendations at present.

Accordingly, I have responded to 3 of the 5 draft recommendations as follows;

<u>Draft recommendation 1</u> - Regulated accident towing and storage fees.

I strongly disagree with the ESC recommendation that the regulated accident towing and storage fees should continue until the annual adjustment mechanism is next applied in 2013-14.

I further find that the suggestion for reference to this decision based on 'key issues' of licence values and changes in industry productivity as one-dimensional and therefore should not be the sole contributing factors for the following reasons;

- a. ESC at 1.2 of the report admits that 'the exact value of an accident towing licence is difficult to assess..." and further more, "VicRoads did not receive transfer values for all transactions and its sample size was too small to provide a weight average.
- b. Licences values are volatile and should not be considered as a key issue, the recent 'wiping off' of hundreds of thousands of dollars per taxi licence should be a solid foundation for the ESC to learn from.
- c. The efficiency of productivity should be measured by rise and fall in profitability. Merely glossing over or reflecting figures of a 1.2% industry growth (Table 1.7) between 2010 and 2012 and blanketing it as 'the demand for accident towing services experiencing recent growths' is actually pitiable given the investment outlay required.

It is ignorant to set aside the following factors that have reduced and will continue to reduce profitability within the towing industry should the regulated accident towing and storage charges remain unchanged and should give reason to the justifiable cause of consistently incrementing the accident towing and storage fees per annum which are as follows but not limited to;

 The demand from Victoria Police on Flat-top requests as impacted on our business so much so that we are retiring conventional tow trucks and forced to replaced them with Flat-tops (Tilt-trays), the cost difference being

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approximately \$80,000 per transaction for used equipment and \$110,000 for new equipment.

- ii. The efficiency for our business occurs at our substantial investment in specialised equipment which are constantly increasing; ie. OHS compliant Recovery Gear and Salvage Equipment.
- iii. Rising Cost in Diesel.
- iv. Rising Servicing Costs.
- v. Rising Insurance Premiums.
- vi. Rising Workcover Premiums.
- vii. Rising Wages from Receptionists to Tow Truck Operators.
- viii. Rising Council Rates.
- ix. Rising Rent
- x. Rising Registration / Fees
- xi. Rising costs associated in the waste disposal of accident related debris left or abandoned.
- xii. Rising Electricity & Water Bills.
- xiii. Rising costs associated in the maintenance of a triple intercept cleaning area specific for our tow trucks so that battery acid, engine and transmission oil spills do not contaminate the waterways.
- xiv. The rise in insurance companies assigning Private and or Corporate Investigation Officers in investigating their insured's accident claim. This has impacted greatly on our business by having to assign a specific person to handle such demanding requests.

I do not believe that the level of accident towing fees are at an appropriate level and as such recommend and support the VACC, in that; fees for accident towing should be increased based on the benchmark data provided by the Pitcher Partners Report.

Draft recommendation 3 - Regulation of basic salvage.

This recommendation is strongly opposed and should not be regulated.

Salvage is a multifarious arrangement interrelated by accident environment verses tow truck operator experience.

What may seem basic salvage to a competent tow truck operator may conversely be deemed complex salvage to an inexperienced tow truck operator and accordingly, the use of recovery equipment and or time extraordinarily different.

It is for this very reason that Salvage should not be dissected into categories.

Furthermore, it is conflicted by the interpretation of competence by the tow truck operator which may be lawfully challenged.

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<u>Draft recommendation 4</u> – Determining the basic salvage and after hours basic salvage fees.

Again, this recommendation is strongly opposed and should not be regulated and consequently should remain as deemed fair and reasonable in like circumstances, verified by images as is currently enforced.

The ESC suggestive rate is unfeasible.

The ESC acknowledges that the average clearance of accident related tows is 50mins or the better part of 1hr to complete and benchmarked (at present) the regulatory price in providing that 1hr service is \$196.90 as a day rate.

Now given that the tow truck operator has to perform a salvage operation in addition to the prescribed service, it would not be deemed unreasonable to charge out accordingly, the same hourly rate for service at \$196.90 per hour or \$98.45 per half hour; which is a fair and reasonable rate, that is unless specialised salvage and or recovery gear is required.

Conversely, the after hours salvage rate in addition to the prescribed service, would not be deemed unreasonable to charge out accordingly, the same hourly rate for service at \$264.10 per hour or \$132.05 per half hour; which is a fair and reasonable rate, that is unless specialised salvage and or recovery gear is required.

Furthermore, the costs payable to tow truck operators attending 'after hours' vary significantly across depots however tow truck operators are paid very generously as incentive to perform the arduous task.

The suggestive after hour rate of \$78.00 inc GST is frankly an absolute insult to the towing operators of this industry and I challenge the Minister and ESC to produce documentation indicating that it is acceptable that a subcontractor of any nature that is required to be on call 24 / 7, that supplies their own \$130,000 machinery within a regulated 30mins and perform in adverse conditions of darkness and often unprotected hazards on a road related area for 1 hour at \$70.91 ex GST.

As a suggestive alternative, if the Minister and ESC deem that \$78 inc GST is a profitable hourly rate in supplying a man with \$130,000 worth of machinery within 30mins to salvage a vehicle within the Controlled Area then maybe the alternative is that the salvage operation be provided by the Government, possibly subsidised by Insurance Companies and the towing industry just focus on timely attendances and towing.

Unfortunately, what is apparent is that the mind set of what is bantered around as fair and reasonable to insurance companies and consumers isn't a cognitive reflection as what is fair and reasonable to tow operators and tow truck operators; should the introduction of basic salvage 'fixed' pricing be implemented as currently recommended.

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In relation to feed back on an appropriate fee for an additional tow truck to attend and assist to the undertaking of salvage, I believe that it should be charged out at the same regulated day rate and or after hour rate, given that the tow operator incurs additional cost's i.e. Wages, Diesel, Running Costs of Wear & Tear, etc..

However; I do agree with the ESC that in the event the Depot already has another tow truck in attendance (i.e. a double allocation) then the Depot would not be entitled to charge for an additional tow truck; <u>unless</u> - an additional tow truck, other than the tow trucks initially nominated and already in attendance, was required to attend to assist in the salvage operation. In this instance it would reasonable to ensure supportive photographic evidence is taken which clearly demonstrates the attendance of the 'additional' tow truck and salvage assistance performed.

SALVAGE DATA:

In addition to that of the supportive material provided by VACC to the ESC submission on 'comparison with reported typical salvage fees in Victoria' reporting an average salvage fee of \$133.75 across 48 invoice; please find *attached* our collective data produced in the Magistrates Court of Victoria in 2010.

Our Data (with associated Tax Invoice Reference Numbers) demonstrates an collective salvage average from 112 authority to tow tax invoices of \$132.59 for Depot 704 and a collective salvage average from 76 authority to tow tax invoice of \$136.17 for Depot 715.

Combined - this equates to a salvage average from 188 authority to tow tax invoices of \$134.03.

You will also note, that our depot also produced to the court a combined salvage average charged derived from 97 authority to tow tax involces specifically to insurance Companies which equated to \$133.95.

What is consistently clear here is the sample group of 48 invoices provided by VACC and our larger sample of 188 authority to tow tax invoices clearly draws a consistent parallel picture that an average industry salvage charge is \$133.75 - \$134.03.

Should you wish to discuss this at any stage please do not hesitate to email or call.

Regards,

Scott Maxman

Operations Manager

Action Towing Pty Ltd

Ph: 03 9311 8111 Fx: 03 9311 1111

Em: scott@actionmotorindustries.com.au

ACTION TOWING PTY LTD

Accidents v Salvage Performed Analysed Data - April 2008 to September 2008

	Total Accidents Allocations Attended	Total Accidents Requiring Salvage	Total Salvage Amount Charged	Average Salvage Amount Charged	Ratio of Salvage to Accidents	Percentage of Accidents Requiring Salvage
Depot 704	256	112	-\$14,850.04	-\$132.59	1:2.3	43.75%
Depot 715	196	76	-\$10,348.68	-\$136.17	1:2.6	38.78%

Note: (-) Negative value is displayed as per audited extraction from accounting software.

The negative value should be disregarded and viewed as a positive value.

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Salvage v Insurance Company Analysed Data - April 2008 to September 2008

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	Total Accidents Requiring Salvage	Total Salvage Amount Charged	Average Salvage Amount Charged
AAMI	16	-\$2,160.00	-\$135.00
AAMI Insurance Airport West	41	-\$5,199.95	-\$126.83
ALLIANZ AUSTRALIA	6	-\$720.00	-\$120.00
ANSVAR AUSTRALIA INSURANCE	1	-\$180.00	-\$160.00
CGU - VACC INSURANCE	3	-\$300.00	-\$100.00
GIO General Ltd	14	-\$2,100.00	-\$150.00
GUILD INSURANCE	1	-\$160.00	-\$160.00
HBA INSURANCE	1	-\$350.00	-\$350.00
INSURERS HOTLINE	1	-\$80.00	-\$80.00
JUST CAR INSURANCE	5	-\$690.00	-\$138.00
LUMLEY GENERAL INSURANCE	1	-\$100.00	-\$100.00
MISCELLANEOUS	76	-\$10,343.77	-\$136.10
QBE MERCANTILE MUTUAL	2	-\$220.00	-\$110.00
RACV INSURANCE	11	-\$1,315.00	-\$119.55
POLICE - REGION 2 HEADQUATERS	3	-\$390.00	-\$130.00
SHANNONS INSURANCE	11	-\$160.00	-\$160.00
SUNCORP METWAY	2	-\$360.00	-\$180.00
VERO INSURANCE	1	-\$160.00	-\$160.00
ZURICH AUSTRALIAN INSURANCE	1	-\$80.00	-\$80.00

-\$133.95 Total Combined Average Salvage:

Note: (-) Negative value is displayed as per audited extraction from accounting software.

The negative value should be disregarded and viewed as a positive value.

Note: Miscellaneous refers to uninsured vehicles or unknown insurance company.

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Type	Date .	Name	Description		
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Tax Invoice	01/07/2008	AAMI Insurance Aiport West	SALVAGE - OFF SIDE OF ROAD OUT OF DITCH PULL TO SAFE GROUND FOR PICKLIP	5 6	-100.00
Tax Invoice	01/07/2008	AAMI insurance Aiport West	SALVAGE - PULLED VEHICLE OUT OF DITCH LIFT UP RECOVER WHEEL TO PREPAIR FCR TOWING	5 5	-180.00
Tax Invoice	01/09/2008	MISCELLANEOUS	SALVAGE - NO KEYS AND VEHICLE WAS LOCKED IN PARK	1 2	00.00
Tax Invoice	02/04/2008	JUST CAR INSURANCE	SALVAGE - REMOVED OFF OF TRAFFIC ISLAND	5 5	25.55
Tax Invoice	02/05/2008	AAMI	SALVAGE - REMOVAL FROM MEDIUM STRIP	15	0000
Tax Invoice	02/05/2008 ·	AAMI	SALVAGE - REMOVAL OF VEHICLE FROM MEDIUM STRIP	20.	8 8
Tax Invoice	02/05/2008	AAMI	SALVAGE - OFF WALL AS REQUIRED	5 5	8000
Tax Invoice	03/04/2008	MISCELLANEOUS	SALVAGE - REMOVED FROM TREE	3 6	120.00
Tax Invoice	03/04/2006	MISCELLANEORIS	SAI VAGE	3 6	200.00
Tax Invoice	03/07/2008	MISCEL AND ST	CALLYACE -	2	-79.62
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ax invoice	05/06/2008	AAMI	SALVAGE - REMOVAL FROM NATURE STRIP	70	-100.00
Tax invoice	05/09/2006	AAM! Insurance Aiport West	SALVAGE - PULLED OF GUTTER ON SIDE OF ROAD AND FOOTPATH	707	-80,00
Tax invoice	06/07/2006	AAMI Insurance Aiport West	SALVAGE - REMOVED FROM NATURESTRIP AS REQUIRED	20,	-100 00
Tax Invoice	06/08/2006	MISCELLANEOUS	SALVAGE - JAMED FRONT WHEEL ON FOOTPATH	704	80.00
Tax invoice	06/08/2006	GIO General Ltd	SALVAGE - PULLED VEHICLE OUT OF GUTTER ON SIDE OF ROAD	704	00'001-
Tax Invoice	07/04/2006	GIO General Ltd	SALVAGE - WEDGED BETWEEN POWER POLE. REQUIRED ASSISTANCE FROM FIRE TRUCK	704	-150.00
Tax invoice	07/04/2006	AAMI	SALVAGE - TWO TRUCKS REQUIRED TO REMOVE VEHICLE FROM INSIDE HOUSE	707	-350.00
Tax Invoice	07/05/2006	GIO General Ltd	SALVAGE - REMOVED FROM TRAFFIC ISLAND	707	-100.00
Tax Invoice	07/07/2006	AAMI Insurance Aiport West	SALVAGE - DISCONECT BATTERY FOR SAFETY OF AIRBAG REALINE BUMPER BAR TO PREDAIR FOR TOWING AS RED	704	-150.00
Tax Invoice	07/08/2006	MISCELLANEOUS	SALVAGE - OFF CENTRE MEDIUM STRIP AS REQUIRED	25	-80.00
Tax Invoice	07/08/2006	AAMI Insurance Aiport West	SALVAGE -PULLED OF SIDE OF ROAD UP ON NATURE STRIP	70.	-100.00
Tax Invoice	07/09/2006	CGU - VACC INSURANCE	SALVAGE - DRAG AROUND FROM FRONT TO PREPAIR FOR TOWING	2 20	-120.00
Tax Invoice	08/04/2006	MISCELLANEOUS	SALVAGE	2 2	-158 18
Tax Invoice	08/07/2006	MISCELLANEOUS	SALVAGE -	25	-120 00
Tax invoice	08/09/2006	AAMI Insurance Aport West	SALVAGE - Removed from out of Bottle Mart Car Park	2 5	00.08
Tax Invoice	08/09/2006	MISCELLANEOUS	SALVAGE - PULLED OUT OF DRIVE WAY OF OWNERS HOME	3 5	00.00
Tax Invoice	09/04/2006	MISCELLANEOUS	SALVAGE - REMOVED FROM ROADWAY	5 5	00.00
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Tax Invoice	11/08/2008	CICT CAD INC. IDANICE	SALVACE - DRAG OFF CENTRE OF KOAD WITH WINCH TO REALINE FOR TOWING	40,	-180.00
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	14/00/2008	GIO General Ltd	SALVAGE - SIDEWAYS ON ROADWAY	8	-100.00
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	17/09/2008	MISCELLANEOUS	SALVAGE OF CURB	5 6	85.00
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TO HOURS TO T	REMOVE ELECTRICAL SYSTEM	SALVAGE - F
1-1/2 HOURS 1704 1704 1704 1704 1704 1704 1704 1704	PULLED OUT OF GATER ON SID	
I VEHICLE & CLEAN UP TIME TOA ORE TOWING DISCONECT ELECTRICAL SYSTEM ALOF PLATATION HICLE DOWN AND COLLECT FROM FRONT TOA FOR ON OPPOSIT SIDE OF ROADWAY DISCONECTING ELECTRICAL S TOA TO PREPAIR FOR TOWING TO PREPAIR FOR TOWING TOA ROLKUP TOA ROLKUP TOA TOA TOA TOA TOA TOA TOA TO	CLEAN UP ROLL OVER & DRAG	SUNCORP MEIWAT INSURANCE LID SALVAGE -
5	OFF ROAD 30 METRES UP ON D	SALVAGE
2	REMOVED FROM SERVICE LAN	SALVAGE - P
2	SKAG OF ROAD	SALVAGE
\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	ULL APARI STUCK ON TRAY O	SALVAGE-P
\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	N POLE AND FOOT PATH	SALVAGE - O
<u> </u>	N ROOF PULLED ON TO WHEE	SALVAGE - OF
\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	HEEL LOCKED NO KEYS PRE	SALVAGE - W
2222222222 222222222222222222222222222	VEYS VEHICLE FULL LOCKE	SALVAGE
\$ \$ \$ \$ \$ \$ \$ \$ \$ \$	RAG OF CENTRE MEDIUM	SALVAGE - DI
\$ \$ \$ \$ \$ \$ \$ \$ \$ \$	LED VEHICLE FROM CURB D	
\$ \$ \$ \$ \$ \$ \$ \$ \$	VITING TIME AND MOTORCYC	MAJOR COLLISION INVESTIGATION UNITSALVAGE - WA
2 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	EMOVING VEHICLE FROM NAT	SALVAGE - R
704 704 704 705 707	MOVED FROM FOOTPATH	SALVAGE - RE
704 704 704 704	JET UP TO REALINE & ELEVATE	SALVAGE - 1
704 704 705	DRAG TO SIDE OF ROAD TO PRE	SALVAGE
TAGE TAGE	OFF ROAD INTO PROPERTY WEI	SALVAGE
DRAG AROUND TURN AROUND & PICK UP FROM FRONT	SALVAGE - OFF PLATATION	SALVAGE
9	OFF FOOT PATH DRAG AROUNT	SAI VAGE