

HUMAN RIGHTS AND EQUAL OPPORTUNITY COMMISSION

APPLICATION FOR EXEMPTION UNDER SECTION 55 OF THE *DISABILITY DISCRIMINATION ACT 1992*

APPLICANT: **THE TAXI COUNCIL OF QUEENSLAND INCORPORATED
AND THE TAXI COUNCIL OF WESTERN AUSTRALIA
INCORPORATED**

SUBMISSION: **THE SUSTAINABLE TRANSPORT COALITION OF
WESTERN AUSTRALIA**

1. This submission is made by the Sustainable Transport Coalition of Western Australia (STCWA) in response to the application by the Taxi Council of Queensland (TCQ) and the Taxi Council of Western Australia (TCWA) for temporary exemption from the Disability Standards for Accessible Public Transport 2002 (*The Standards*), specifically the requirement that response times for wheelchair accessible taxis are to be the same as for non-wheelchair accessible taxis.
2. The submission deals with matters relating to the generality of such an exemption and also to some specific matters relating to Western Australia, where the existence of an agreement reached in the Human Rights and Equal Opportunity Commission (HREOC) in 1996 has implications for any exemption that might be granted. Finally, we provide some specific responses to statements made in the *Application* and the associated *Affidavit of Blair Davies*.

The Sustainable Transport Coalition of Western Australia (STCWA)

3. The STCWA is a not-for-profit volunteer organisation that brings together community and stakeholders to seek sustainable transport in Perth and throughout Western Australia. The STC works towards more sustainable and liveable communities, where the transport system facilitates access, protects the environment and promotes quality of life.¹

¹ <http://www.stcwa.org.au>

4. Social and equity issues are an integral part of the STC's definition of sustainable transport is the one developed by the Canadian Centre for Sustainable Transportation²: *A sustainable transportation system is one that:*

4.1. allows the basic access needs of individuals and societies to be met safely and in a manner consistent with human and ecosystem health, and with equity within and between generations.

4.2. is affordable, operates efficiently, offers choice of transport mode, and supports a vibrant economy; and

4.3. limits emissions and waste within the planet's ability to absorb them, minimises consumption of non-renewable resources, limits consumption of renewable resources to the sustainable yield level, reuses and recycles its components, and minimises the use of land and the production of noise.

5. Whilst most of the STCWA activity has been in the areas of environment, energy and economy, the principal concern is with the outcomes for the community and for people as individuals. Paragraphs 4.1 and 4.2 above in the definition of sustainability clearly relate to the outcomes for people. Committee Members of the STCWA come from a variety of transport and non-transport backgrounds.³

6. This submission was compiled primarily by Ian Ker and Diana Ryan, both Committee Members of STCWA.

6.1. Ian Ker is a transport planner and economist who specialises in walking, cycling, travel behaviour change and universal access. After a long career in transport policy, planning and research in the public sector, he is now an independent consultant and is also a local government Councillor. He was the prime mover behind the Perth Bicycle Network Plan and the Perth Accessible Public Transport Plan and was part of the development of TravelSmart, all of which were national and international leading-edge initiatives.

In addition to leading the team that developed the Perth Accessible Public Transport Plan, Ian was an inaugural member of the National Accessible Transport Committee (established under the *Disability Discrimination Act, 1992*)

² <http://cst.uwinnipeg.ca>

³ http://www.stcwa.org.au/index.php?option=com_content&task=view&id=22&Itemid=98

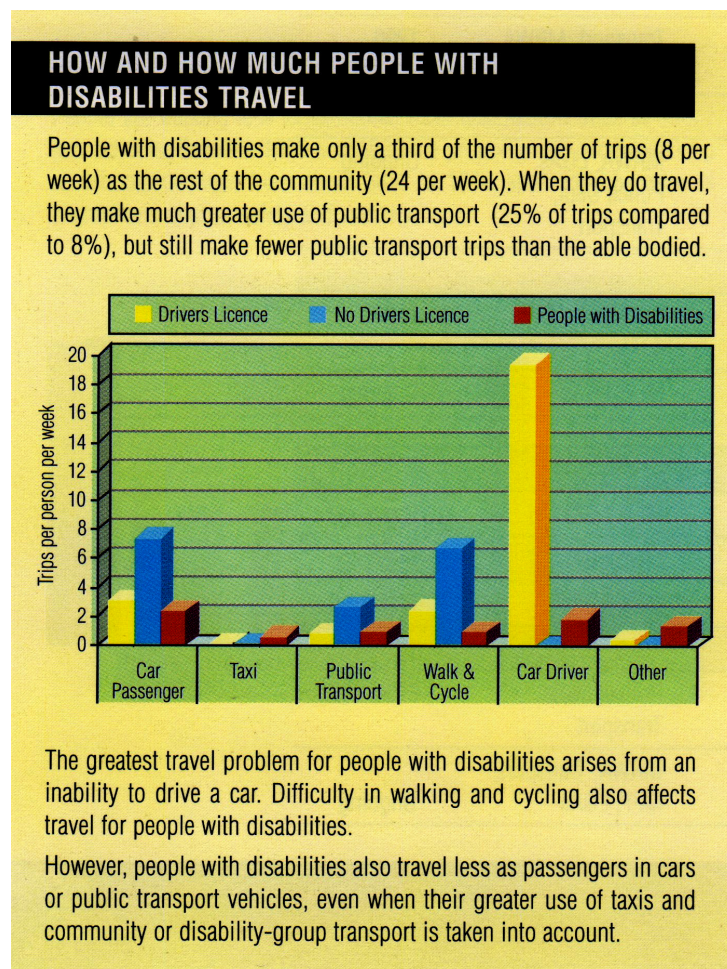
and of the Accessible Public Transport Standards Working Group, established by the Australian Transport Council of Ministers in October 1994.

As an elected Councillor for the Town of Vincent, he was responsible for the establishment of the Town's Disability (now Universal) Access Advisory Group and has chaired the group since its inception.

6.2. Diana Ryan is studying Planning at the Institute of Sustainability and Technology Policy, Murdoch University, with interests in quality public transport systems and equitable access to housing. Diana is a member of Women With Disabilities WA.

Background on Multi-Purpose Taxis in Perth

7. People with disabilities have very low levels of mobility, even compared with people who do not have a drivers licence or a disability. People with disabilities use taxis more than the community generally and are proportionately much more dependent on taxis for mobility and access to services, activities and employment.



Source: Perth Metropolitan Transport Strategy (1995).
http://www.dpi.wa.gov.au/mediaFiles/about_archivemts.pdf

Single Operator

8. MPTs in Perth are co-ordinated by a single taxi booking service (currently Black and White Taxis). This is subject to periodic tendering, but at any one time there is only a single telephone booking service for MPTs. We believe (although this would need to be confirmed with the Department for Planning and Infrastructure) that the conditions of tender include the 'equivalent response time' requirement.
9. With a single phone booking service, the task of ensuring compliance with the equivalent response time requirement is less difficult than it would be with a multiplicity of operators.

Performance-based regulation is standard practice for taxis in Western Australia

10. The Department for Planning and Infrastructure is responsible for regulation of taxis, in general, and multi-purpose taxis in particular. It's main tools are:
 - 10.1. Regulation of supply, through progressive release of additional taxi plates, including time-restricted and area-restricted plates, to meet demand where the performance of the taxi industry fails to achieve required standards; and
 - 10.2. Regulation of price, to ensure that taxi operators receives a reasonable income whilst not exposing customers (particularly in the 'rank' and 'hail' markets) to an imbalance of negotiating power.
11. This form of regulation, and its associated practice in Western Australia, has been the subject of a competition policy review⁴ and accepted as being consistent with the requirements of national competition policy.

Multi-Purpose Taxis are offered a wide range of concessions by the WA Government

12. The Department for Planning and Infrastructure provides a wide range of concessions⁵ for the operators of multi-purpose taxis, including:
 - 12.1. Concessional lease rates (currently \$100/week for 10 years, compared to \$250/week for 8 years for conventional taxis);⁶

⁴ BSD (1999). Review of the Western Australian Taxi Industry: BSD Consultants, Economics Consulting Services and Estill and Associates FOR Department of Transport: Perth, WA.

- 12.2. A \$15,000 vehicle modification grant to help meet the cost of modifying a vehicle so that it is wheelchair accessible.
 - 12.3. A \$700 vehicle equipment grant to pay for the installation of an additional taxi meter that can be read by passengers in wheelchairs.
 - 12.4. Half-price MPT plate lease fees for 6 months for new entrants (worth \$1,300 per lease).
 - 12.5. Up to \$1,500 in training assistance to new MPT drivers through the MPT Cadetship Scheme.
 - 12.6. Lifting-fee subsidies in addition to the metered fare for every wheelchair job undertaken through the Taxi User Subsidy Scheme:
 - 12.6.1. \$10 when allocated through a taxi dispatch service; or,
 - 12.6.2. \$7 when booked through private arrangements.
13. Users of MPTs are covered by the Taxi user Subsidy Scheme, which provides a 50% or 75% subsidy for taxi travel (depending upon whether the user actually travels in a wheelchair or can transfer to a seat in the taxi) to a person with a disability that prevents use of conventional public transport. This is subject to a maximum subsidy of \$25 per trip.⁷ Whilst this is technically a user subsidy, it is paid to the driver. This substantial subsidy has an important impact on increasing the mobility of people with disabilities, especially those who use wheelchairs – in turn, this increases the demand for MPTs and the income of taxi operators.

Matters Relating to the Accessible Public Transport Standards

14. The taxi industry already receives substantial concessions under the Accessible Public Standards 2002, as other modes of public transport are subject to requirements for all vehicles to be accessible within a timeframe largely reflecting the lifespan of vehicles. The equivalent response time criterion applies only to the telephone hire segment of the taxi market, with much more limited accessibility requirements applying to the remainder of the market.

⁵ <http://www.dpi.wa.gov.au/taxis/15179.asp>

⁶ <http://www.dpi.wa.gov.au/taxis/15247.asp>

⁷ <http://www.dpi.wa.gov.au/taxis/15155.asp>

15. Part 36, Section 36.1 of the *Standards* encourages consultation between operators, providers, all levels of government and the community to ensure that accessible public transport initiatives will reflect local and regional needs. There is no evidence that TCQ or TCWA has undertaken any such consultation in respect of this application for exemption. On the contrary, the *Application* (para 51) and the *Affidavit* (para 30) both state that *It is unknown whether an exemption of the type sought by the TCQ and TCWA would be opposed.*

Matters Specific to Disability Access in Western Australia

16. Accessible public transport in Perth is subject to the requirements of *Going Out and Getting There*⁸, which is a conciliated Action Plan in resolution of a complaint under the *Disability Discrimination Act, 1992*. This includes an identical provision to that in the *Standards* for equivalent response times for MPTs (Action Ta7, p43).
17. As a conciliated agreement in resolution of a complaint under the *DDA*, the provisions of *Going Out and Getting There* are enforceable in the Federal Court. Any changes would have to be approved by the original complainants and endorsed by the HREOC.
18. Any change to the *Standards* to apply a lower level of accessibility requirement than required by *Going Out and Getting There* has no impact upon the requirements of the Action Plan, which states (p10 – emphasis added):

When disability standards for public transport are proclaimed under the Disability Discrimination Act, this Action Plan will be reviewed and upgraded ... where it does not already meet or exceed those standards. Where this Action Plan exceeds the standards, its provisions will not be diminished.

Since an exemption is specifically allowed by the *Standards*, we submit that this provision would also apply to the temporary exemption sought by TCWA.

Matters Relating to the Application and the Affidavit.

19. The *Application* is, on the face of it, for the exemption of the taxi booking companies from the equivalent response time requirement. In principle, this does not remove the

⁸ <http://www.dpi.wa.gov.au/access/1697.asp>

criterion, per se, but would leave the responsibility for compliance with others. Given that criterion is a collective one:

- 19.1. individual taxi operators are unable to ensure collective compliance; and
- 19.2. the Department for Planning and Infrastructure (the taxi regulator) is able to create the conditions for compliance (releasing sufficient MPT plates for lease), but does not manage the taxi booking and job-allocation process.

Only the taxi booking company can directly influence the allocation of MPT phone bookings in a way that is consistent with the equivalent response time requirement.

20. No information is presented on why Queensland and Western Australia are different from the other States and Territories. If the taxi industries in other States and Territories are not seeking the same exemption, it begs the questions:

- 20.1. What is different about Queensland and Western Australia?
- 20.2. What might be learned from the other states and territories to facilitate the effective implementation of the equivalent response time requirement?

21. Neither the *Application* nor the *Affidavit* makes any mention of:

- 21.1. Consultation with government or community stakeholders (see paragraph 15 above); or
- 21.2. What measures the applicants will implement, nor how such measures would be developed, instead of the *Standards* from which it seeks exemption.

22. Paragraph 14 of the *Application* (paragraph 13 of the *Affidavit*) states that:

The requirement that response times for wheelchair accessible taxis are to be the same as for non-wheelchair accessible taxis has the potential to create real practical difficulties for taxi booking companies.

No evidence is provided of any such difficulties actually having been experienced, despite the equivalent response time requirement having been in place under the *Standards* since 2002 and, in Perth, since 1996 under the *Going Out and Getting There* Action Plan.

23. The *Application* largely rests on the assertions that taxi booking companies:

- (a) do not control the number of wheelchair accessible taxis within their fleet and/or control; and

(b) are unable to compel the driver of a wheelchair accessible taxi to accept a fare request from a disabled person who requires a wheelchair accessible taxi.

24. In Western Australia, the number of wheelchair accessible taxis in the fleet is not a relevant compliance issue, as the Department for Planning and Infrastructure makes available sufficient MPT plates to allow the criterion to be satisfied. If the equivalent response time requirement is not satisfied, it would be sufficient for the taxi booking company to demonstrate either that the DPI had not made sufficient MPT plates available or that these plates had not been taken up in sufficient numbers. At 3 December, 2007, there were only two MPT plates available for lease⁹ out of a total of 84 Multi Purpose Taxi plates.¹⁰

25. As already noted (para 19 above), the *Application* does not provide any information on what might be learned from other states and territories in respect of achieving compliance with the equivalent response time requirement. In the case of Western Australia:

25.1. All MPTs are co-ordinated by a single taxi booking company (para 8 above);
and

25.2. The MPT co-ordinator operates under contract to the Department for Planning and Infrastructure, which reflects the equivalent response time requirement required by both the *Standards* and the *Going Out and Getting There* Action Plan.

It is, therefore, open to the MPT co-ordinator to require that MPT operators give priority to those users requiring a wheelchair accessible taxi. Global positioning systems (GPS) and information systems already in operation allow the company to identify the location of MPTs and whether they are already carrying a fare.

26. Paragraph 18 of the *Application* quotes the *Guidelines on applications for temporary exemption under the Disability Discrimination Act*, specifically matters that should be addressed in any such application. Most of these have not been addressed in this *Application*:

⁹ <http://www.dpi.wa.gov.au/taxis/15247.asp>

¹⁰ http://www.stcwa.org.au/index.php?option=com_content&task=view&id=1428&Itemid=134

- 26.1. *Why immediate compliance with the DDA is not possible, or why immediate compliance with the DDA, though technically possible, should not be required, regarding the matters to be covered by the proposed exemption.*

The *Application* refers only to potential problems and does not document or provide details of any actual problems experienced, their extent or their impacts on the applicants.

- 26.2. *Processes and results of any review undertaken by the applicant to identify discriminatory practices or circumstances and means for their removal.*

No information is provided on any such review, including, for example, practices and experience in other states and territories.

- 26.3. *In particular, details of any consultations undertaken with people with a disability and their representative organisations for these purposes.*

No such consultations have been carried out (see paragraph 15 above).

- 26.4. *Any measures already implemented or planned by the applicant to achieve the objects of the DDA.*

No information is provided. Paragraphs 37 and 38 of the *Application* are assertions about the impact of an exemption not evidence of measures already undertaken or planned.

- 26.5. *Reference to any relevant details of any Action Plan developed and lodged in accordance with Part 3 of the DDA.*

No reference is made to any such Action Plan, despite taxi services in Perth being covered by requirements under the *Going Out and Getting There* Action Plan.

- 26.6. *Details of success or difficulties in implementation of any such Action Plan to date.*

No information is provided.

- 26.7. *Details of financial or other hardship to the applicant or other persons which will be incurred if the exemption is not granted.*

The *Application* asserts that there would be no financial gain for taxi booking companies (paragraph 34) but that 'potential cost savings' would accrue *in the area of unrecoverable legal costs associated with the successful defence of complaints arising from taxi booking companies being unable to comply with the Standards* (paragraph 36). The latter is tantamount to an argument

against the *Standards* per se, as it applies equally to all parts of the *Standards* and all public transport operators.

- 26.8. *Measures proposed to minimise or reduce any hardship which may occur to people with a disability and any other people affected by the circumstances or practices in question, due to non-compliance with the DDA during the period of the exemption.*

No information is provided, other than the general statement that *taxi booking companies would still be obliged and expected to use their reasonable endeavours to eliminate unlawful discrimination, including disability discrimination, from all of their operations* (paragraph 35). This is pure sophistry, as the purpose of the exemption sought is to remove a specific requirement to remove discrimination.

The HREOC states that the Commission *has not been prepared to grant exemptions simply to certify that discrimination may continue, on the basis of unjustifiable hardship or other defences. However, the Commission has been prepared to grant exemptions on condition that the applicant makes and meets commitments to improve access or opportunity within a reasonable period.*¹¹ The *Application* provides no information on alternative measure that will be developed or implemented to improve access to taxi services for people in wheelchairs.

It must be noted that the proclamation of the *Standards* under the Disability Discrimination Act 1992 effectively supersedes the Act itself unless comparable provisions have been included in the *Standards* themselves. This is why the exemption provision of the DDA is restated in the *Standards*.

- 26.9. *To what extent the exemption is designed to preserve the status quo, and to what extent it would permit new actions which may be contrary to equal access and opportunity for people with a disability.*

This begs the question of what the 'status quo' should be regarded as being six years after the promulgation of the *Standards* and, in Western Australia, 10 years after the *Going Out and Getting There* Action Plan.

¹¹ http://www.hreoc.gov.au/disability_rights/exemptions/exemptions.html

26.10. *Terms or conditions which promote achievement of the objects of the DDA and which the applicant is prepared to meet as a condition of receiving the exemption.*

No information is provided.

27. In paragraphs 21 – 23, the *Application* argues that the exemption sought is ‘fair and reasonable’, largely on the grounds that *taxi booking companies seek to merely be responsible for those matters that are within the responsibility of the taxi booking company*. The *Affidavit* (paragraph 16) clarifies by stating that it *seeks to remove any potential responsibility for the actions or inactions of others involved in the delivery of taxi services (such as taxi drivers and Government regulators of the taxi industry) over whom the taxi booking companies have no legal or other capacity to exercise control*.

The issue of the Government regulator has been discussed elsewhere in this submission (paragraphs 10, 11 and 24).

For the argument in respect of the taxi drivers to have any validity, we submit that the applicants would need to demonstrate:

- (a) that the taxi booking company bears no responsibility for the delivery of conventional taxi services in response to telephone bookings; and
- (b) there is a technical or legal impediment to their directing drivers of MPTs to give priority to phone bookings from people requiring a wheelchair accessible taxi.

Neither the *Application* nor the *Affidavit* provides any information to support either of these.

28. In paragraphs 24 - 28, the *Application* argues that there are ‘compelling reasons’ for granting the exemption. The argument is essentially the same as that in paragraphs 21 – 23, dealing with the inability to direct drivers or to control the number of MPTs in the fleet. These issues have been responded to in paragraph 27 above of this submission.

This part of the *Application* also states that, as a result, *it is effectively impossible for taxi booking companies to control whether the Standards target is met at all times* (paragraph 26 of the *Application*). This appears to be a misinterpretation of the equivalent response time criterion, which can only be effectively measured over a period of time and not in respect of individual taxi bookings.

29. In paragraphs 29 – 31, the *Application* argues that *there are sound social reasons for granting the exemption*. This largely relates to the diverse nature of the taxi market and the fact that MPT vehicles are not acceptable to some segments of the market or to some individual customers.

We submit that this is not an argument for exemption from the equivalent response time requirement but, rather, an argument in support of it. It was precisely the difficulty of developing a wheelchair accessible vehicle that would also meet the needs and preferences of other users that led to the *Standards* accepting that only part of the taxi fleet would be required to be accessible, provided that a suitable performance measure was in place to guide the supply of MPT services to offer a comparable level of service to people with disabilities.

As already noted (paragraph 14 above), one consequence of this is that there is not equality of access in the 'rank' and 'hail' markets. This makes it all the more important not to remove equality of access in the telephone booking market.

30. In paragraphs 32 and 33, the *Application* argues that the exemption would be *in the public interest and for sound social reasons*. This relates entirely to unsupported and unsubstantiated claims that *it is quite possible that any changes to response times may seriously impede the ability of taxi booking companies to sustain operations and this is especially the case with the smaller taxi booking companies*.

No information or evidence in support of this assertion is provided.

In Perth, MPTs are coordinated by a single taxi booking company so any other companies would be unaffected.

31. In paragraphs 34 – 36, the *Application* argues that the exemption *would not result in the personal gain for taxi booking companies*. Our response to this is at paragraph 26.7 above.

32. In paragraphs 37 and 38, the *Application* argues that *taxi booking companies have taken reasonable steps to avoid/reduce/eliminate discrimination*. This does not provide information or documentation of any such 'reasonable steps' and consists entirely of assertions that taxi booking companies will treat all of their customers equally.

33. In paragraphs 39 – 42, the *Application* argues that *the exemption is broadly consistent with the objects of the DDA*. This is largely a restatement of the inability to be responsible for the actions or inactions of others (taxi drivers or taxi regulators).

We acknowledge that the actions of others will affect the ability of the taxi booking company to achieve the equivalent response time requirement. We also note that taxi drivers and taxi regulators also have requirements upon them to comply with the *Standards*. However, this should not be used as an excuse for removing a requirement for taxi booking companies to use their best efforts to ensure compliance with the equivalent response time criterion.

34. In paragraphs 43 – 46, the *Application* argues that *there are no other non-discriminatory ways of achieving the objects/purposes for which the exemption is sought*.

The applicant has not demonstrated this, although it has argued, with little practical evidence as distinct from assertion, that the existing requirement should not be retained. In particular, it has not provided information on models in other states and territories of Australia for which exemption is not being sought.

35. In paragraphs 47 – 49, the *Application* argues that *the exemption is necessary*. It does so largely on the basis of a lack of certainty and the inefficiency of determining breaches through courts and tribunals.

Any lack of certainty can be addressed by provision of guidance to both the taxi industry and to people with disabilities regarding the interpretation of the equivalent response time requirement. We submit that such guidance should be that:

- (a) the distribution (over a specified period of time) of response times should be no worse than that for conventional taxis; and
 - (b) where the MPT performance is not comparable to that of conventional taxis over the specified period, the taxi booking company should seek operational improvements and/or an increase in the number of MPTs authorised by the taxi regulator.
36. In paragraphs 50 – 53, the *Application* argues that there would be support from some other stakeholders and opposition from others. Again, no evidence is provided, but the *Application* acknowledges that this can only be determined by the Commission's own processes.
37. In paragraphs 56, the *Application* submits that *there is no act of unlawful discrimination if a person has no discretion to act otherwise*.

In response, we submit that the taxi booking companies responsible for MPTs do have both discretion and technical ability to achieve the equivalent response time requirements of the *Standards*, subject to a caveat concerning the actions of the taxi regulator. If non-compliance can be shown to be a result of the taxi regulator not allowing sufficient MPTs to be licensed, the taxi booking company cannot be held at fault. This is not an argument for exemption, however, but for clarification of responsibilities.

In Perth, taxis are subject to the *Going Out and Getting There* Action Plan, which also includes an equivalent response time requirement and MPTs are operated by Black and White Taxis under contract to DPI (which is also bound by the Action Plan). In this case, even if the exemption from the *Standards* were to be granted, the taxi booking companies would have no discretion not to comply with this requirement.

Summary

38. People with disabilities make many fewer trips by all modes of transport, except taxis and specialised community transport, than the community generally.
39. Multi-purpose taxis are a very important part of the access and mobility opportunities for people with disabilities who rely on wheelchairs.
40. MPTs in Perth receive a wide range of financial concessions to support their operation and also benefit from the highest rate of subsidy (75%) under the Taxi User Subsidy Scheme.
41. The *Application* is, on the face of it, for the exemption of the taxi booking companies from the equivalent response time requirement. In principle, this does not remove the criterion, per se, but would leave the responsibility for compliance with others. Given that criterion is a collective one, only the taxi booking company can directly influence the allocation of MPT phone bookings in a way that is consistent with the equivalent response time requirement.
42. MPTs in Perth are co-ordinated by a single taxi dispatch service. This minimises any difficulties associated with the equivalent response time criterion.
43. There has been no consultation with government or the community with respect to this *Application*.

44. The taxi industry already receives substantial concessions under the Accessible Public Standards 2002, as other modes of public transport are subject to requirements for all vehicles to be accessible within a timeframe largely reflecting the lifespan of vehicles.
45. In Western Australia, taxis are also subject to an equivalent response time requirement under *Going Out and Getting There*, the accessible public transport action plan for Perth. This requirement would not be affected by a change to the *Standards*, as *Going Out and Getting There* is a conciliated resolution of a complaint under the *Disability Discrimination Act, 1992*.
46. The *Application* has not demonstrated the existence of a real problem, especially in view of the fact that the equivalent response time requirement has been in place under the *Standards* for over five years and, in Perth, under the *Going Out and Getting There Access Plan*, since 1996.
47. The *Application* has not provided information on why other state and territory taxi associations are not party to this application. This is particularly important in terms of whether the models used in these places might preclude the problems foreseen by the TCQ and TCWA.
48. Most of the arguments put forward by TCQ and TCWA in support of the exemption are not supported by information or evidence; the *Affidavit*, on which the *Application* relies very heavily, contains little in the way of substantial information.

Conclusion

49. This *Application* for exemption should be dismissed as the applicant merely seeks exemption and does not provide any indication of what measures the applicants will implement nor how such measures would be developed instead of the *Standards* from which it seeks exemption. Whilst the *Application* is for a five-year temporary exemption, the lack of any such information or intent strongly suggests that the situation would be unchanged at the expiry of any such temporary exemption and that the TCQ and TCWA would seek extension under Section 33.15 of the *Standards*.
50. The *Application* deals largely in assertion rather than evidence and practical experience either in Queensland and Western Australia or in the other states and territories that are not a party to the *Application* for exemption. It has not provided

information on or assessed the opportunities to facilitate compliance with the equivalent response time requirement of the *Standards*.

51. Guidance should be provided to both the taxi industry and to people with disabilities regarding the interpretation of the equivalent response time requirement. We submit that such guidance should be based on:

- (a) the distribution (over a specified period of time) of response times should be no worse than that for conventional taxis; and
- (b) where the MPT performance is not comparable to that of conventional taxis, the taxi booking company should seek operational improvements and/or an increase in the number of MPTs authorised by the taxi regulator.

Ian Ker

and

Diana Ryan

For and on behalf of the SUSTAINABLE TRANSPORT COALITION OF WESTERN AUSTRALIA

31 January 2008