

8 April 2013

Mr David Salisbury  
Deputy General Manager  
Fuel, Transport and Prices Oversight Branch  
Australian Competition & Consumer Commission (ACCC)  
By email: [airport.group@acc.gov.au](mailto:airport.group@acc.gov.au)

Dear Mr Salisbury,

**RE: PROPOSED CHANGES TO THE GUIDELINE FOR QUALITY OF SERVICE MONITORING AT AIRPORTS**

The Australian Taxi Industry Association (ATIA) is the national peak representative body for the taxi industry in Australia. Its membership comprises the following peak State / Territory taxi industry representative bodies –

- New South Wales Taxi Council;
- Victorian Taxi Association;
- Taxi Council of Queensland;
- Taxi Council of Western Australia;
- Taxi Council of South Australia;
- Taxi Council of the Northern Territory; and
- Canberra Taxi Industry Association.

The ATIA has considered the consultation document titled, “Proposed changes to the guideline for quality of service monitoring at airports”, (the Report) and offers the following comments.

1. The ATIA supports an ongoing role for the ACCC in monitoring the performances of the operators of Brisbane, Melbourne, Perth and Sydney airports. Moreover, the ATIA commends the ACCC for seeking to extend the monitoring program to increase the transparency of these airport operators’ performances.
2. The ATIA, and its members, would strongly oppose any removal or dismantling of the monitoring program. We do not believe that the respective airport operators’ commercial interests, or their service level agreements with airlines, provide failsafe or sufficient protection for the interests of taxi passengers or members of the taxi industry.
3. The ATIA is of the view that the ACCC’s role in relation to price and quality of service monitoring, at least as it relates to landside access and taxi services, should not be diminished by Domestic Terminal Leases (DTL). Specifically, the existence of a DTL should not place a relevant matter outside of the scope of the ACCC’s monitoring program.
4. The ATIA shares the ACCC’s concerns, as expressed on page 24 of the Report, that airport operators have “*the ability to impede competition from alternatives to on-airport car parking by imposing excessive charges or restrictive terms and conditions for landside access*” and thereby manipulate higher prices for, and sustainably reap higher profits from, their car parking services.

5. The ATIA endorses the ACCC's view, as expressed on page 24 of the Report, that the taxi industry and its passengers would be able to provide, "*valuable insight ... on taxi facilities, kerbside pick-up and drop-off*" and its proposal on page 58 to consult landside operators.
6. The ATIA supports the ACCC's recommendation on page 58 of the Report for amendments to be made to the Airports Regulations that would require airport operators to collect and report objective data on the capacity of services and facilities provided to landside operators (particularly taxis). The objective measures should include –
  - a. Central Holding Area data about size, facilities, control arrangements, ingress and egress arrangements, and proximity to terminal ranks;
  - b. Terminal Ranks data about size, control arrangements for taxis, passenger queuing infrastructure and support, ingress and egress arrangements, and proximity to terminal baggage areas;
  - c. Taxi drop-off area data about size, congestion management arrangements and proximity to terminal departure areas; and
  - d. Arrangements and infrastructure for wheelchair accessible taxis and the assistance provided to or from pick-up / drop-off points and the terminal building for persons with disability.
7. Subject to our comments in relation to objective measures noted in point 6 above, the ATIA is generally supportive of the ACCC's approach as articulated in Table 6.16 on page 59 of the Report.
8. The ATIA, and its member State associations in Queensland, Victoria, Western Australia and New South Wales would be willing to coordinate the surveying of taxi operators in order to supply the data and information required by the ACCC in relation taxi services and facilities at Brisbane, Melbourne, Perth and Sydney airports. We would also be prepared to assist the ACCC's engagement with taxi operators directly.

Finally, the ATIA would welcome the opportunity to provide further information or clarification on any the points or matters raised in this submission.

Yours sincerely



Blair Davies  
Chief Executive Officer