



Geelong Radio Cabs

Co - Operative Ltd
ABN: 29 926 229 831

9 July 2004

Attention: Mr J. Byrne
Australian Competition & Consumer Commission
PO Box 1199
DICKSON ACT 2602

FILE No.
DOC:
MARS/PRISM:

Dear Jason,

**Your Ref: C2004/32 Authorisation: A90463 Geelong Radio Cabs Co-Operative Ltd
Taxi Service**

We acknowledge receipt of your letter of 17 June 2004, and advise that:

1. This company still engages in the conduct which was the subject of authorisation A90463.
2. This company still requires that authorisation.

Additionally we submit that:

1. After years of acceptance, taxi passengers now have an expectation that they may pay taxi fares by a variety of methods other than cash, and a greater proportion of people and corporate entities in our society now prefer non-cash transactions.
2. It would create an inconvenience for taxi passengers to have to check a selection of taxis on a rank or when hailed off the street to ascertain whether the driver was prepared to accept their preferred method of payment, especially if the passenger only had one non-cash option by which to pay the fare.
3. In the case of taxis booked by telephone, we do not interrogate each passenger calling us as to their preferred method of payment. To do so would slow the call-taking process and greatly inhibit our ability to allocate the nearest suitable vehicle available for prompt customer service. Indeed a very large number of passengers prefer to access IVR (interactive voice response) booking services which would not allow for questioning the preferred method of payment.
4. Front time to time we have occasion to counsel drivers on the importance of accepting all approved methods of payment for the convenience of passengers. The other consideration is that non-cash settlement of fares provides greater safety for drivers as they are less attractive targets for robbery without large amounts of cash.

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MEMBER COMPANY OF

Cabcharge

NATIONAL CHARGE CARDS FOR CABS

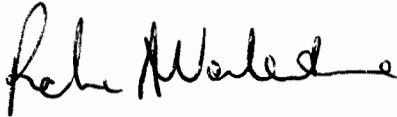
5. We are unaware of how the ACCC may have formed the view that there has been a material change of circumstances since the authorisation was granted. We cannot see any change which could be construed in this way.

We, along with the taxi industry nationally, have responded to that section of the market which has clearly indicated a growing preference for non-cash settlement of taxi fares, in the belief that to do so provides options for the consumer and enhances competition between competing modes of transport.

The Authorisation was sought, and should be continued, in the interests of service and convenience for taxi passengers, and maintaining the expected range of payment options.

Taxi drivers and taxi operators can use, and some do, alternative processing of non-cash transactions. Some may wish to reject non-cash transactions, perhaps to reduce their accountability.

Yours sincerely,



Peter A. Valentine
General Manager