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Director, Adjudication Branch
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2600

4 August 2015.

Reference: A91501 - ihail Pty Ltd application for authorisation

Dear Sir,

I write to lodge an objection to the proposed ihail taxi booking “app” on the grounds that it will entrench the dominant position enjoyed by MTData. If the app is to be released it should be on the basis that it can work with other dispatching systems.

MTData currently provides the dispatching system used in virtually all the Australian cities and large regional areas. As a result it probably services at least 95% of taxis in Australia and is indisputably the largest supplier. CellTrack Systems, on the other hand, provides the SmartMove dispatching system used in approximately 60 regional taxi fleets so probably has the largest number of taxi fleets. Sigtec and CabSat have a small share of the market and there may well be other minor players.

The submission from ihail rather disingenuously states that any fleet can use the ihail app, irrespective of size¹. What is not stated is that a fleet must switch to the MTData dispatching system in order to do so. This effectively squeezes out all other dispatching systems.

It is our contention that if the submission is approved it should be done on the basis that the ihail app supports other dispatching systems. It is worth noting that the booking app supplied by the organisation 131008² already allows a passenger to book a taxi in any fleet that is affiliated with 131008 irrespective of the dispatching system used.

I reiterate that CellTrack Systems opposes the current application by ihail Pty Ltd on the basis that it reinforces MTData’s dominant position in the dispatching system market. Adapting it to other dispatching systems will genuinely make it a “universal booking platform”³ and would enhance the product.

A handwritten signature in blue ink, appearing to read "S.W. Cumpston".

S.W. (Bill) Cumpston
Managing Director, CellTrack Systems Pty Ltd

Bill.Cumpston@smartmovetaxis.com



¹ Letter to ACCC dated 26 June 2015. 3rd paragraph.

² See website at 131008.com.

³ Letter to ACCC dated 26 June 2015. 3rd paragraph.