



Friday, 12 June 2015

Arndrea Mackie

By email: spsvreview@transport.govt.nz

RE: Small Passenger Services Vehicles Review

Dear Arndrea;

Further to our briefing on the 4th June, on behalf of Zoomy, we would like to provide our opinions pursuant to the key points you have raised.

Zoomy is delighted to have been invited to be part of this process. We are an innovative technology provider to the SPSV sector and have several other taxi interests. We believe we can offer a balanced view to assist all parties to achieve their objectives in providing their services.

Rather than electing a preferred option of the 6 that have been tabled, our preference is to state our view on each of the key issues, which the Ministry can take on board as it continues to refine those for eventual consultation and submission.

We look forward to further consultation.

Yours Sincerely

Ben Unger

Director and Chair

DDI: +64 (0)9 379 5117

Mb: +64 (0)21 919 676



OVERVIEW OF THE ZOOMY VIEW

Zoomy has a view that there should be an equal playing field for all participants in the SPSV sector, whether taxi companies, technology providers, or any other party to it, however they describe their service.

We recognise the problem is in definitions of what *is* the SPSV sector, where the historic definition was “taxi”, but that no longer always applies due to the introduction of new technology (such as ours).

We see only two types of passenger services relevant to this review – commercial hire, and carpooling. Whilst the definitions need to be very specific we believe a common sense approach will identify which is which, but in general:

- Car-pooling which is not-for profit, cost sharing, and does not create any extra journeys;
- Commercial Hire is everything else, and includes Taxis, Shuttles, Private Hire and Ride Share.

For clarity, Zoomy provides its service exclusively to the latter category.

On that basis we believe all rules, regulations and requirements should apply equally across the Commercial Hire sector. We do not comment on the Car-pooling model.

KEY ISSUES (AS DEFINED BY THE MINISTRY, 4TH JUNE)

BOOKING OR HAILING SPV SERVICES

Taken the above overall view, there should be no distinction. All service providers should be able to provide all services, and can elect which ones to provide within one regulatory environment.

SAFETY

We recognise how paramount this is. As a representative of the passengers we provide into vehicles, we believe safety should not be compromised irrelevant of how the ride is gained, or the contract is entered into. Whatever the source of the arrangement, the same safety considerations must be applied. We do not want to explain to our customers the different safety considerations if the (for example) pre-booking, casual hailing, or sharing a vehicle. Worse, we do not believe it constructive that any rider should experience a different safety level depending on which mobile app they used to find a vehicle.

IN-CAR CAMERAS

As per the above under safety, we would expect the Ministry and the participants to agree this, and it be consistent across all forms of Commercial Hiring.

PANIC ALARMS

As per the above under safety, we would expect the Ministry and the participants to agree this, and it be consistent across all forms of Commercial Hiring.



PROVIDING CUSTOMERS ACCESS TO 24/7 TAXI SERVICES

Zoomy operates a 24/7 service. We see the compulsoriness as an outcome of the safety issues defined above, as the newer technologies make the ability to provide the service 24/7 very cost effective. Other than safety, it is a decision at the operator level.

CONSUMER PROTECTION, PRICING AND FARES

Our systems support a greater flexibility in fare structure, and we are aware the rigidity of it currently is a constant source of complaint from our customers. We believe as long as the fare, or the charging methodology, is agreed between customer and provider before the commencement of the service, we feel it is fair on all parties.

REGULATING OF RIDESHARING

As above, Ridesharing is commercial hire and should be covered by the same rules as other forms of commercial hire. We do not differentiate, and neither should the regulations.

ENSURING COMPLIANCE WITH REGULATORY REQUIREMENTS

Of course.

OTHER CONSIDERATIONS

As Zoomy does not operate vehicles on its own accord, we have no view on the need for PSLs, P licences etc., but we would like clarity on exactly what the requirements are to operate Small Passenger Services (so we do not inadvertently provide rides to unlicensed operators).

We would also like clarity on tax and GST implications in ride provision – who is liable for which component. We understand that this is not currently clear, and again could create an unequal environment.