

Hill Lee

From: DALTON Daniel <[REDACTED]>
Sent: 14 December 2015 18:34
To: TfL Consultations
Subject: TfL consultation - draft for approval

Importance: High

Dear Mr Daniels,

I am writing to you regarding the TfL's public consultation into your proposed new private hire regulations and gratefully request that you consider this letter as part of the consultation.

Looking at the proposals, I have significant concerns about the potential negative impact, both on consumers and people who wish to offer their time or vehicles, both of which are scarce resources, on ride sharing app platforms. I also have significant concerns about the direction which TfL appears to be travelling on this issue, as they appear to be disregarding the reality of a modern, digitally based economy and the significantly better use of scarce resources the sharing economy in general can offer to a crowded city like London.

By utilising modern technology, and the wish of people to offer their labour outside of traditional working environments, ride sharing services have radically altered taxi markets across the world. Their success have been based partly on convenience, by being able to order a ride simply using a mobile phone. Their simplicity and relatively cheap price have allowed many people to use private vehicles who could not have afforded to do before in a city like London.

I am therefore concerned that these proposals seem focused entirely on penalising consumers and taking away the benefits of ride sharing services, without adequately addressing some of the genuine concerns in this area. Specific proposals such as introducing a five minute wait between a consumer booking and the car setting off seems confused. All it does is make the service less attractive for a consumer without offering the consumer any other alternative, other than having to wait five minutes longer when they previously didn't need to. This does nothing to support consumers travelling in a busy and crowded global city such as London. In addition, the proposal to ban the showing of the location of drivers for immediate hire shows a misunderstanding of modern technology. If the technology exists to do this, why would TfL make a proposal which is so clearly anti-consumer and anti-choice and which specifically blocks a piece of technology which is available for consumers to use and which is available in the rest of the UK and the rest of the world. The additional proposal to stop drivers from working for more than one operator at a time focuses on penalising the most enterprising and hard working in society and sends a very bad message to those who want to work, especially as for many people the cost of living in London is so high that many search for additional work.

The direction that these proposals go is deeply anti consumer, anti innovation and runs counter to the global brand that London seeks to promote for itself. It is a forward thinking, technologically advanced city that should be embracing the benefits that the shared economy can bring, particularly when all the vehicles used by ride sharing apps are already registered and on the streets of London. Using them more effectively and matching surplus resources with unmet demand should be a key priority of TfL, not protecting outdated legislative models at the expense of consumers and tourists, many of whom expect to be able to use ride sharing services with the same freedom they can at home when they arrive in London.

There has been significant protest and frustration from the traditional black cab industry to the rise of ride sharing services. I very much understand this because they currently are not operating on a level playing field. However, ride sharing apps have ruthlessly exposed the weaknesses from a consumer perspective of the black cab experience. By offering a service more tailored to what a consumer wants, such as real time information on drivers and cars, immediate bookings, automatic payments and peer ratings they have exposed the competitive failings of the black cab industry. The response from TfL should be to encourage the black cab industry to take up these technological advances that consumers demand, and not to try to

deny consumers of them. In addition, due attention should be made to the concerns of the black cab industry as they do not operate on a level playing field, particularly with regards to the cost of and the regulations around licence applications. However, the better approach would be to find ways to lighten the regulatory and cost burden which comes with applying for a licence, not to penalise consumers for wanting a service which modern technology has made possible.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

Daniel Dalton MEP

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