

Response ID ANON-QPYE-14PR-6

Submitted to **Have your say on Private Hire Operator Licence Fees**

Submitted on **2017-05-10 14:04:29**

Our proposals

1 Do you agree with our proposal to change the existing structure to reflect the size of private hire operators?

Partially

2 Do you agree with the proposed tiers to be used to allocate fees?

No

3 Do you agree that operators in the three largest tiers should be able to pay the grant of licence fee in annual instalments?

No opinion

4 Do you have any further comments?

Comments:

We wish to make the following comments;

a) We welcome the alignment of fees with the size of organisation

b) We strongly object to a two tier system (per vehicle fees apply at a 1000+ threshold) on the basis of it being both inequitable and arbitrary - the per vehicle fee should be applicable to all tiers. This will make the charge both equitable and reasonable

c) We agree that a car based fee structure is equitable provided that it applies throughout the scheme NOT just organisations with 1001+ registered vehicles

d) We propose that work is undertaken by Transport for London to identify where fees could be directly aligned with function e.g. licensing/relicensing this would enable more granularity in the charging process i.e. can it cost any more to relicense a small or large operator so why not an identical charge for that function? There should be an attempt to separate out fixed and variable costs based on the size of organisation that is being licensed/relicensed.

e) We propose that quality/compliance ratings feature in the scheme e.g. highly rated organisations pay a lower cost as they incur less administrative and enforcement resources. We understand that there is a range from 1-7. The high risk/high regulatory activity operators should pay proportionately more and low risk/low regulatory activity should pay proportionately less.

f) We propose that licensed vehicles that are not registered with an operator incur the basic Licensed Operator Fee. This will not entitle them to be an operator but will adversely impact people who have licensed vehicles for nefarious reasons and remove many incentives to do so.

g) We propose that the Operator Fee is charged on a five year basis i.e. a fixed fee but that the per vehicle fee is collected annually based on the average fleet size in the preceding 12 months. In the case of new licences the per vehicle fee will be reconciled after the first year of operation.

h) We require that an SLA for the functions of administration, licensing and enforcement that show costs to licence, administer and enforce each operator (anonymous data) so that there is more transparency in licence costs and a demonstration of ongoing efficiency together with proposals to improve productivity and efficiency ideally on an annual basis.

About you

5 What is your name?

Name:

██████████

6 What is your email address?

Email:

████████████████████

7 Please provide us with your postcode?

Postcode:

██████████

8 Are you responding as:

A representative of an organisation

Other:
Private Hire Operator

9 If responding on behalf of an organisation, business or campaign group, please provide us with the name:

Organisation:
Addison Lee Limited

10 How did you find out about this consultation?

Received an email from TfL

Other:

11 What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Acceptable

Do you have any further comments about the quality of the consultation material?:

Yes, the level of information provided has been scant. We need far more transparency in the distribution of costs, which costs are volume related and which are not, the distribution of resources between poor quality and high quality operators.

There is no clear rationale apart from a bland generalised statement

Equality Monitoring

12 Gender:

█

13 Ethnic Group:

██████████

14 Age:

█

15 Sexual Orientation:

██████████

16 Faith:

██████████

17 Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (Please include problems related to old age)

No