

Taxi  
Regulator



Commission For Taxi Regulation  
An Coimisiún Um Rialáil Tacsaithe

# SERVICES

National review of taxi, hackney and limousine services

Goodbody Economic Consultants  
Institute of Transport Economics, Norway  
Millward Brown IMS

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Larger text copies are also available on the website, or by request from the Commission for Taxi Regulation.

Telephone +353 1 659 3800

Fax +353 1 659 3801

Email [commission@taxiregulator.ie](mailto:commission@taxiregulator.ie)

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The views expressed in this report, including the recommendations made, are those of the consultants. The Commission for Taxi Regulation has had regard to the findings of the report and its recommendations in formulating its proposals which are contained in a document published separately. The document, entitled *'Roadmap towards a new national code of regulations for taxis, hackneys and limousines in Ireland'* is available from the Commission.

Commission For Taxi Regulation  
35 Fitzwilliam Square  
Dublin 2, Ireland  
Tel: +353 1 659 3800  
Fax: +353 1 659 3801  
[www.taxiregulator.ie](http://www.taxiregulator.ie)  
[commission@taxiregulator.ie](mailto:commission@taxiregulator.ie)

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Goodbody Economic Consultants  
Ballsbridge Park,  
Ballsbridge, Dublin 4  
Tel: 353 1 641 0482  
Fax: 353 1 668 2388  
[www.goodbody.ie/consultants](http://www.goodbody.ie/consultants)  
[econsultants@goodbody.ie](mailto:econsultants@goodbody.ie)



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# Contents

Executive Summary	viii	<b>6 Quality of cab services</b>	
<b>1 Introduction</b>		6.1 Introduction	29
1.1 Background	1	6.2 Waiting times	29
1.2 Objectives of the study	1	6.3 Consumer perceptions	30
1.3 Study methodology	2	6.4 Changing trends	33
1.4 Report layout	3	6.5 Quality of services for people with disabilities	34
<b>2 Organisation of the taxi, hackney and limousine market</b>		6.6 Complaints and complaint mechanisms	36
2.1 Overview of the market	4	6.7 Summary	38
2.2 Institutional structures	5	<b>7 Fare levels and structures</b>	
<b>3 Trends in cab numbers</b>		7.1 Introduction	39
3.1 Introduction	6	7.2 Background	39
3.2 National trends in cab numbers	6	7.3 Composition of the typical fare card	39
3.3 Characteristics of cabs	8	7.4 A review of published fares	39
3.4 Distribution of cabs by area	11	7.5 A comparison of fares across taximeter areas	43
3.5 Conclusions	11	7.6 Standardising fare structures	45
<b>4 Taximeter areas</b>		7.7 International comparisons	46
4.1 Introduction	12	7.8 Conclusions	48
4.2 Designating taximeter areas	12	<b>8 Industry structure and economics</b>	
4.3 Current taximeter areas	12	8.1 Introduction	49
4.4 Licences issued	13	8.2 Dispatch companies	49
4.5 Scale of taximeter areas	16	8.3 Profiling taxi drivers	50
4.6 Taxi ranks	17	8.4 Taxi supply	52
4.7 Issues for consideration	17	8.5 Earnings	52
4.8 Conclusions	17	8.6 Summary	54
<b>5 Demand for cab services</b>			
5.1 Introduction	18		
5.2 Cab use	18		
5.3 Trends in cab use in Dublin	22		
5.4 Cab use by businesses	25		
5.5 Cab use by tourists	26		
5.6 Cab use by people with disabilities	27		
5.7 Summary	28		

<b>9</b>	<b>Improving market organisation and operation</b>		<b>12</b>	<b>Streamlining fares and fare setting</b>	
9.1	Introduction	55	12.1	Introduction	74
9.2	The dual system	55	12.2	Maximum fares	74
9.3	Taximeter areas	56	12.3	Streamlining fares	75
9.4	Compliance with SPSV regulations regarding plying for hire	58	12.4	Adjustment of fares	77
9.5	Provision of ranks	58	12.5	Conclusions	78
9.6	Use of Quality Bus Corridors and bus lanes by cabs	58	<b>13</b>	<b>Improving administrative systems</b>	
9.7	Licensing of dispatch companies	59	13.1	Introduction	79
9.8	Conclusions	59	13.2	The current procedure for cab licensing	79
<b>10</b>	<b>Raising the quality of service</b>		13.3	Application for and renewal of a Small Public Service Vehicle driver's licence	80
10.1	Introduction	60	13.4	The role of the Legal Metrology Service	80
10.2	Vehicle quality	60	13.5	The National Car Testing Service	81
10.3	Standard colour for vehicles	61	13.6	The scope for a more streamlined and cohesive administrative system	81
10.4	In-cab consumer information	61	13.7	Setting Small Public Service Vehicle licence and driver licence fees	82
10.5	Driver qualities and standards	61	13.8	Monitoring and information needs	83
10.6	Current procedures for ensuring adequate driver standards	62	13.9	Conclusions	83
10.7	Driver conduct	63		<b>Conclusions and recommendations</b>	
10.8	Driver education and training	63	14.1	Conclusions	84
10.9	Safe operation of the cab	63	14.2	Recommendations	85
10.10	Complaints procedures	64		<b>Appendices</b>	
10.11	Conclusions	66	A	List of members of the Advisory Council to the Commission for Taxi Regulation	88
<b>11</b>	<b>Providing services for people with disabilities</b>		B	List of consultation meetings	89
11.1	Introduction	67		<b>Glossary</b>	90
11.2	Experiences abroad	67			
11.3	Increasing the number of wheelchair accessible taxis	68			
11.4	Improving levels of service	72			
11.5	Conclusions	73			

## List of tables

3.1	Number of cabs in use, 1993–2004	7	5.14	Distribution of people with disabilities by factors inhibiting cab usage	27
3.2	Breakdown of taxis and hackneys by engine cubic capacity, 2004	8	6.1	Distribution of adults by length of waiting times	29
3.3	Number of cabs by type of fuel, 2004	9	6.2	Times of the day when most difficulties/delays experienced	30
3.4	Number of cabs by age (or year of first registration)	9	6.3	Consumer perceptions of cab services	30
3.5	Number of cabs by local authority area, 2002	10	6.4	Distribution of adults by perception of value for money	31
4.1	Populations of towns and cities with taximeter areas	13	6.5	Distribution of adults by perception of ease with which fares are calculated	31
4.2	Taximeter areas by number of SPSV licences in operation	15	6.6	Distribution of adults by perception of display of fare cards	32
4.3	Towns with no designated taximeter area and populations >10,000	16	6.7	Tourist ratings of Irish taxi services relative to services in their own country	32
5.1	Distribution of adults by modes of transport used in last six months	19	6.8	Distribution of adults by waiting times: 1997, 2001 and 2005	33
5.2	Distribution of adults by frequency of cab use	19	6.9	Distribution of people who use wheelchairs by reason given for refusal of service	34
5.3	Distribution of trips by how trips are arranged and geographical area	20	6.10	Perceptions of people with disabilities of cab services	35
5.4	Distribution of trips by time of day trip taken and age of cab user	21	6.11	Perceptions of people with disabilities who use wheelchairs	36
5.5	Distribution of trips by distance travelled and geographical area	22	6.12	Distribution of adults who had ever made a formal complaint	37
5.6	Distribution of trips in Dublin area by method of hire: 2001 and 2005	23	6.13	Distribution of adults by knowledge of where to report complaints	37
5.7	Distribution of journeys in Dublin area by purpose of journey: 1997, 2001 and 2005	23	6.14	Distribution of adults by knowledge of where to report complaints and geographical area	37
5.8	Distribution of journeys in Dublin area by time of day: 1997, 2001 and 2005	24	7.1	The typical fare card structure	40
5.9	Distribution of trips in Dublin area by distance travelled: 1997, 2001 and 2005	24	7.2	Ranking of typical fares by taximeter area	44
5.10	Distribution of businesses by type of cab company used most often	25	7.3	Average daytime fares in major European cities (€)	46
5.11	Distribution of tourists by mode of public transport used	26	7.4	Average fares in major cities during unsocial hours (€)	47
5.12	Distribution of tourists by how cab trips arranged	26	7.5	Average daytime fares in selected Irish and British cities and towns (€)	48
5.13	Frequency of cab use by people with disabilities and the general population	27			

7.6	Average fares in smaller Irish and British cities and towns during unsocial hours (€)	48	11.1	WAT licences in operation by taximeter area	68
8.1	Distribution of drivers by number of shifts worked per week	51	11.2	Capital costs of vehicles	69
8.2	Average weekly hours worked and average annual mileage by shift working pattern	52	11.3	Comparing incomes of drivers of WATs and drivers of ordinary taxis	70
8.3	Annual operating costs	53	11.4	The potential impact of a VRT remission on incomes of WAT drivers	70
8.4	Typical income of a taxi driver	54	11.5	The potential impact of VRT remissions and VAT repayments on incomes of WAT drivers	71
8.5	Gross taxable incomes, hours worked and hourly earnings for industrial workers and taxi drivers	54	13.1	Licence fees for cabs (€)	79

## List of figures

3.1	Breakdown of cabs in use 2004	6	6.2	Consumer perceptions of the availability of cabs	31
3.2	Index of cabs licensed, 1993–2003	7	6.3	Distribution of adults by factors that would encourage greater cab use	33
4.1	Towns with taximeter areas	14	6.4	Distribution of adults by perception of value for money: 1997, 2001 and 2005	34
5.1	Cab users using cabs at least weekly by age group	19	6.5	Distribution of people who use wheelchairs by perceptions of safety equipment in WATs	35
5.2	Proportion of cab trips by purpose of journey	20	7.1	A comparison of fares by taximeter area	42
5.3	Distribution of cab trips by day of the week	21	8.1	Estimated distribution of dispatch companies in Dublin by number of cabs affiliated	50
5.4	Distribution of adults by frequency of cab use in the Dublin area: 1997, 2001 and 2005	22	8.2	Distribution of drivers by weekly dispatch fees paid (%)	50
5.5	Distribution of cab trips in the Dublin area by day of the week, 2001 and 2005	23	8.3	Distribution of drivers by hours worked	51
5.6	Proportion of businesses with one or more dispatch company accounts	25	8.4	Distribution of drivers by typical shift pattern worked (%)	51
5.7	Distribution of businesses by number of cabs ordered daily	25	8.5	Breakdown of all shifts by day and night (%)	52
5.8	Distribution of tourists by frequency of cab use during stay	26	8.6	Distribution of day and night shifts by day of week	52
6.1	Distribution of businesses by frequency with which cabs ordered arrive within a reasonable time	29			

## Executive summary

Goodbody Economic Consultants, in association with IMS Millward Brown and the Institute of Transport Economics, Norway, were appointed by the Commission for Taxi Regulation to carry out a national review of services provided by taxis, hackneys and limousines.

The key objectives of the study were twofold:

- To assess the extent and quality of services provided by taxis, hackneys and limousines in Ireland; and,
- To make recommendations that would inform the development of quality consumer oriented licensing systems for taxis, hackneys and limousines and their drivers.

The methodology employed by the consultants comprised a number of consumer surveys, a survey of taxi drivers, and extensive consultations with key stakeholders and interested parties and bodies. Four public consultation meetings were also held in Clonmel, Cork, Dublin and Sligo, and over 130 written submissions, received from interested parties and bodies and the general public, were reviewed.

The study concludes that the taxi and hackney market is working well. There has been a rapid increase in the number of cabs,\* particularly in the number of taxis, since liberalisation of the market in 2000. This increase in the number of vehicles has meant an increase in the levels of service delivered to the consumer in terms of general availability and reduced waiting times. The increase in service in terms of availability of taxis and hackneys, has not to date been at the expense of a reduction in the quality of service delivered.

Against this background of progress, there remain a number of issues that need to be addressed to maintain and improve taxi and hackney services:

- While consumers in general are satisfied with the quantity and quality of services, services continue to be inadequate for people with disabilities;
- The complaints systems that are currently in place are inadequate and consumers are often unaware of complaint procedures;
- Certain towns of significant size have not declared taximeter areas, with the result that some hackneys are operating outside the law and plying for hire on street;
- Enforcement of the legislation in relation to the operation of hackneys is inadequate outside major urban areas in particular;
- Where taximeter areas have been declared, they are often poorly designed, covering very small geographical areas with the result that the bulk of trips are not on the meter or subject to maximum fare regulation;
- Consumers are faced with a relatively complex fare structure, which differs from one taximeter area to another. The fact that maximum fares operate only within taximeter areas is confusing to the customer;
- Although precise data on earnings is difficult to estimate, the indication is that average earnings for taxi drivers have fallen since market liberalisation;
- Consumers are often not fully aware of their rights and responsibilities, and taxi and hackney drivers of their obligations in relation to cab services; and,

\* The term cab refers to taxis, hackneys and limousines.

- Taxi and hackney vehicle and driver licensing systems are somewhat fragmented at present and measures to streamline the process of vehicle and driver licence application should be considered.

To maintain and further improve taxi, hackney and limousine services, the following recommendations are made:

- Better education of taxi and hackney users in relation to their rights as consumers and the legal code applying to taxi and hackney services is necessary. Consumers would also benefit from the development of a user-friendly guide to the regulations;
- There is a need for better in-cab information. It is recommended that driver and vehicle licence details, and fare cards be displayed both in the front and rear of all taxis and hackneys and that this be accompanied by information on customer complaint procedures with summary details in a number of foreign languages;
- A comprehensive information and complaints system is required. It is recommended that dispatch companies be required to maintain a log of complaints for inspection by the Commission. It is also recommended that the Commission take the lead in the development and administration of a complaints system in co-operation with the Garda Síochána. A penalty points system should be developed for drivers who have complaints against them upheld;\*
- It is recommended that a Customer and Driver Charter be introduced. This would be based both on the obligations and powers of both consumers and drivers as set out in legislation, as well as on societal norms regarding good behaviour. It would detail customers' and drivers' rights and responsibilities, and be an integral element in driver education and training and in the dissemination of information to consumers;
- It should be the aim of policy to expand significantly the proportion of cabs that are wheel-chair accessible and enhance the services they provide, and to monitor the impact on the level of services provided to people with disability;
- In order to incentivise this, a remission by the Government of VRT on new purchases of wheel-chair accessible vehicles is recommended, subject to their drivers affiliating to a dispatch company;
- Government should also consider the removal of VAT on the purchase and conversion of accessible vehicles. This would be done subject to drivers affiliating with dispatch companies and installing additional accessibility features. Such features might include:
  - A bright yellow colour coding of the vehicle;
  - Bright yellow internal grab handles;
  - Clearly marked seat edges, door handles and window controls; and,
  - A talking meter that is activated as the journey begins;
- Access for the public to information on the number of wheelchair accessible taxis that are affiliated to individual dispatch companies would give greater transparency concerning the capacity of dispatch companies to deliver services to people with disabilities;
- It is recommended that the dual system of taxi and hackney licensing is retained in the short term, and the issue reconsidered again when other reforms such as consumer education, greater controls and re-balancing of licence acquisition and renewal charges have been implemented;
- Taximeter areas should be extended to cover towns with significant populations, and to ensure that the geographic boundaries of taximeter areas reflect the settlement pattern;
- It is recommended that two options be considered in this regard:
  - A town-based approach whereby all towns above a certain size, say 7,000 population, have a taximeter area of, say, 15 kilometre radius, with Dublin having an area of approximately 30 kilometres; or,
  - A county-based approach in which each county becomes a taximeter area, with the four local authorities in Dublin continuing to operate a joint taximeter area;

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\* This may require further primary legislation.

- These changes to taximeter areas will reduce the potential for the illegal operation of hackneys in certain towns. However, greater resources should also be applied to enforcement of the SPSV regulations;
- Access to bus lanes and Quality Bus Corridors should be extended to hackneys and limousines;
- The same fare structure and fare levels should apply in all taximeter areas;
- A tiered fare structure is recommended that compensates drivers for long-distance journeys and allows all journeys to be made on the meter. This will extend the operation of maximum fare control beyond taximeter areas;
- Taxi fares should normally be reviewed every two years and reflect changes in the cost of taxi operation and the need for productivity improvements;
- Hackney fares should continue to be unregulated;
- Where it is used, it is considered that the knowledge test for the licensing of small public service vehicle drivers is sufficiently rigorous and that the introduction of a practical element is not a priority. However, attendance at a training course should be obligatory. It is recommended that the renewal period for driver licensing be reduced to two years, and that professional development training be part of the renewal process;
- The adequacy of vehicle and driver licence fees will require further consideration, when the Commission takes on its full functions. It is clear that driver licence fees are insufficient to cover the costs involved, and will need to be raised;
- At €6,300, the first time taxi licence fee may operate as a barrier to entry to the market. It is recommended it be radically reduced in the context of a re-balancing of fees away from first-time fees towards renewal fees;
- With regard to small public service vehicle driver licences, consideration should be given to procuring the issuing of the licence and the testing of applicants from an external provider, with the 'fit and proper person' assessment continuing to be a function of the Garda Síochána;
- A one-stop-shop approach to the licensing, meter verification, and testing of vehicles should be considered. It is recommended that the Commission for Taxi Regulation explore the possibility for joint procurement of these services with the Department of Transport and the Legal Metrology Service, as and when the opportunity arises; and,
- It is not recommended that a standard cab be introduced, as there is no real demand for this and it could unnecessarily increase the costs to the trade. Likewise, there is no real demand for a standard colour for cabs, and such a policy is not recommended.

# 1 Introduction

## 1.1 Background

The 2003 Taxi Regulation Act, when fully commenced, will transfer a broad range of regulatory functions, previously exercised by the Department of Transport, local authorities and the Gardaí to the Commission for Taxi Regulation. The Commission for Taxi Regulation is an independent public body with the principal function of developing and maintaining a regulatory framework for the control and operation of taxis, hackneys and limousines and their drivers to ensure a quality consumer oriented service for users.<sup>1</sup> The Act also established an Advisory Council to the Commission for Taxi Regulation, to advise the Minister for Transport in relation to issues relevant to small public service vehicles and their drivers. The Government appointed a Commissioner, who is commonly referred to as the Taxi Regulator, to oversee the work of the Commission.<sup>2</sup>

The Commission is seeking a baseline of information to inform the development of its strategic plan,<sup>3</sup> which will set out its objectives and proposed actions for the period 2005–2009.

The Commission appointed Goodbody Economic Consultants, in association with IMS Millward Brown and the Norwegian Institute of Transport Economics to undertake a major national review of services provided by taxis, hackneys and limousines. The Commission also appointed Dublin Institute of Technology to carry out a complementary national review of vehicle standards in the SPSV sector. Their findings are presented separately.

## 1.2 Objectives of the Study

The key objectives of this study were:

- To assess the extent and quality of services provided by small public service vehicles in Ireland; and,
- To make recommendations that would inform the development of quality consumer-oriented licensing systems for small public service vehicles and their drivers.

In this regard, there were a number of issues that needed to be researched as follows:

- Consumers' views of the quality of the service offered;
- Measures to improve the quality of vehicles and drivers, and the way in which the service is delivered;

<sup>1</sup> Taxis, hackneys and limousines are referred to collectively in legislation as small public service vehicles (SPSVs).

<sup>2</sup> In this report, the terms 'Commission', 'Commissioner' and 'Taxi Regulator' are interchangeable.

<sup>3</sup> The strategic plan will also be guided by the statutory framework (the 2003 Taxi Regulation Act) and the Government's White Paper 'Towards Better Regulation'.

- The way in which people with disability should be catered for both in terms of vehicle design and operation of the market;
- The need to retain separate licensing systems for taxis and hackneys;
- The need to retain the concept of taximeter areas, and if so, how they should be delineated;
- The advantages and disadvantages of a uniform fare level and structure for the country as a whole;
- The potential to simplify the fare structure;
- The case for extending fare control to hackneys;
- The criteria to be applied and the process to be followed in reviewing fare levels and responding to the requests of taxi interests for fare increases;
- The establishment of an efficient and effective system of complaints and quality assurance; and,
- The potential to streamline the licensing systems that cab owners face.

### 1.3 Study methodology

In line with the terms of reference, the study:

- Examined the nature and structure of the small public service vehicle market in Ireland;
  - Reviewed the supply and demand for small public service vehicles in Dublin, Cork, Sligo and Clonmel together with the overall quality of the service;
  - Examined the current regulatory framework and its impact on the market;
  - Assessed the level and adequacy of services for people with disabilities;
  - Mapped out existing procedures, requirements and terms and conditions in relation to small public service vehicle driver licences and vehicle licences, and the roles of existing agencies involved in the regulation and enforcement of small public service vehicles, and identified the potential for change;
  - Examined the level of competition in the small public service vehicle industry and developed a profile of income generated; and,
- Drew on experience in other countries in relation to such policies and innovative practices as would inform consideration of the above issues.

#### 1.3.1 Data collection

The review of supply and demand and the overall quality of services required a significant data collection exercise to gauge the behaviour and views of consumer groups. Taxis, hackneys and limousines are used by personal consumers, business users and tourists. Each of these consumer groups includes people who use wheelchairs and people with other disabilities. Thus, a number of surveys were carried out to gauge the demand emanating from these groups, and to establish their views on the services provided, as follows:

- A household survey was carried out across Ireland to establish usage of taxis, hackneys and limousines by private individuals and to assess consumer satisfaction with the levels of service provided. Conducted during February and March 2005, the survey took the form of a personal interview with a target representative sample of 2,400 adults across all four provinces;
- A telephone survey was carried out in February 2005 across a random sample of 250 Irish-based businesses. Issues discussed included usage of cab companies and the type of company used, the type and level of service demanded by business consumers, and the level of service delivered as perceived by these consumers;
- A survey of 100 tourists was carried out in Dublin in March and April 2005. Taking the form of an on street personal interview, the survey established tourists' perceptions of the level of service offered. It also measured their understanding of key features of the services such as fares and complaints procedures. Issues discussed included the level of use of public transport in general, the frequency of travel, and how the tourists ranked Ireland's taxi and hackney services against those in their own country;
- A postal survey was also administered, with the assistance of the Irish Wheelchair Association, to a random sample of 1,000 of their members – 135 questionnaires were completed and returned.

The survey gauged the level of service and standards provided by wheelchair accessible vehicles and evaluated the current level of services for people with disabilities. A small survey of 40 members of the National Council for the Blind of Ireland was also administered to establish the needs of people with visual impairment;

- Because supply in the market is crucially determined by the cost situation facing drivers and their approach to the business, a survey of drivers was also administered to collect data on characteristics of drivers and the operating costs and conditions facing them. Conducted during March 2005, the survey took the form of a questionnaire administered, with the co-operation of Dublin City Council, as drivers attended the Council's offices to renew their licences. A total of 150 drivers were surveyed; and,
- In order to draw on international experience, the Institute of Transport Economics analysed policies and practice in a number of countries, particularly in regard to licensing systems, taximeter areas and provision for people with disability.

### 1.3.2 Consultation process

In addition to the data collection process, an extensive consultation process was undertaken:

- Public Consultation meetings were held in Clonmel, Cork, Dublin and Sligo;
- Extensive face to face consultations were held with a number of key stakeholders and interested parties and bodies, including the Advisory Council to the Commission for Taxi Regulation. A list of these is attached as Appendix B at the end of this report. A list of the members of the Advisory Council to the Commission for Taxi Regulation is also attached as Appendix A; and,
- The Commission received over 130 written submissions from interested parties and bodies and the general public. Copies of these submissions were passed to the consultants for review.

## 1.4 Report layout

The report begins by setting out in Section 2 the basic organisation of the market in relation to vehicle and driver licensing, and the institutions that regulate the industry. The national trends in taxi and hackney numbers and trends in vehicle types are then set out in Section 3. Section 4 considers the current number of taximeter areas and their location, as well as towns without taximeter areas. Sections 5 and 6 examine the frequency of taxi and hackney use by different consumer groups and the quality of the services provided as perceived by consumers. Fare structures are examined in Section 7, with comparisons made between structures both within Ireland and abroad. Industry structure and economics are discussed in Section 8, with reference made to the role of dispatch companies, the prevalence of owner-drivers and their potential earnings. Section 9 considers the improvements that might be made to market organisation and operation, and Section 10 discusses the approach that could be taken to raise the quality of service. Section 11 considers both the strategic and short-term approaches to improving the provision of services to people with disabilities. This section also examines the economics of operating a wheelchair accessible taxi. Section 12 makes recommendations for streamlining fares and fare settings, and recommendations for improving administrative systems are made in Section 13. Section 14 presents conclusions and recommendations.

## 2

Organisation of the taxi,  
hackney and limousine market

## 2.1 Overview of the market

This section of the report provides a brief overview of the main features of the cab market nationally. In Ireland, small public service vehicles are public service vehicles with seating for up to eight persons. For ease of expression, these vehicles are referred to collectively as 'cabs' in this report.

There are four categories of cab or small public service vehicle licence as follows:

- Taxi
- Wheelchair Accessible Taxi
- Hackney
- Limousine

Historically, only taxi and hackney licences existed. However, in 1992 the category of wheelchair accessible taxi licence was introduced, with vehicles in this category being subject to lower licence fees. At the time of their introduction, access to the market was controlled, with increases in taxi numbers being permitted only on an occasional basis. The increases were usually confined to wheelchair accessible taxis. Wheelchair accessible taxis must have equipment such as ramps, wheelchair anchorages and belts suitable for accommodating a person seated in a wheelchair.

The category of limousine licence was introduced for the first time in the year 2000. Limousines were previously included within the hackney category. A limousine must have an engine capacity of at least 1900 cubic centimetres and be 'suited by reason of its style and condition for the provision of hire services for ceremonial occasions, or for corporate or other prestige purposes'.<sup>4</sup>

Taxis, including wheelchair accessible taxis, are permitted to ply for hire in the street and to stand at ranks. They are also currently permitted to use with-flow bus lanes and Quality Bus Corridors. They thus acquire business both through picking up passengers in the street and by telephone ordering. Hackneys and limousines are not permitted to pick up passengers on street, and are not currently allowed in bus lanes.

Taxis and hackneys are often affiliated to a dispatch company that provides the cab driver with radio communication and takes telephone bookings from the consumer on his or her behalf in return for a weekly fee.

Largely because they are allowed to ply for hire and stand at ranks, taxis are subject to maximum fare control. They are required to use a taximeter, which displays the maximum fare, and, since 2002, a printer that automatically prints a fare receipt. To distinguish them from private cars and hackneys, they are also required to carry a roof sign.

As a result of a decision of the High Court in 2000 and confirmed by a judicial review in 2001, entry to the taxi market was liberalised. As a result, there has been a substantial increase in taxi numbers throughout the country.

<sup>4</sup> S.I. 255 of 2000

Taxis have usually been licensed for operation in urban areas only, where there are substantial in-street pedestrian movements that create a demand for taxis. These areas are declared to be Taximeter Areas and taxis are restricted to plying for hire within these areas, and are subject to maximum fare control for journeys wholly within such areas.<sup>5</sup> Taxi drivers have an obligation to carry a passenger within a taximeter area, when standing for hire in that area. However, not all urban areas have declared taximeter areas, so that taxis do not operate in several relatively populous towns throughout the country.

To drive a cab, a driver must be in possession of a small public service vehicle driver's licence.

## 2.2 Institutional structures

Currently, responsibility for licensing cabs rests with the local authorities. They also are responsible for the declaration of taximeter areas, the setting of maximum fares and the designation of taxi ranks.

Before a vehicle can be used as a cab, it must pass suitability and safety tests. Since 2000, such testing has been carried out on behalf of the State by the National Car Testing Service (NCTS), which is a private company. Taxis must also have a taximeter fitted and calibrated to the current fare structure by a taximeter supplier. Verification and inspection of taximeters in compliance with the Metrology Acts is the responsibility of the Legal Metrology Service, which is a State body.

The Garda Síochána is responsible for enforcing the legislation in relation to cabs in general. They are also responsible for granting small public service driver's licences. The Garda Commissioner must satisfy himself that the applicant for such a licence is a fit and proper person and has adequate knowledge of traffic regulations, the regulations applying to small public service vehicles, and of the area in which he or she proposes to work. The Garda Síochána also investigate complaints from the general public and operate a lost property service.

The Taxi Regulation Act, 2003, provided for the establishment of a Commission for Taxi Regulation<sup>6</sup> and an Advisory Council. A Taxi Regulator was appointed in 2004, on foot of this legislation. When the legislation is fully commenced, the Taxi Regulator will have wide ranging powers relating to the regulation of cabs, the granting of vehicle and driver licences, the establishment of taximeter areas and the setting of fares. Many of the current functions of the Minister for Transport, the local authorities and the Garda Síochána will then be exercised by the Taxi Regulator.

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<sup>5</sup> or in two contiguous taximeter areas.

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<sup>6</sup> References to 'the Commission' in this report refer to the Commission for Taxi Regulation.

# 3 Trends in cab numbers

## 3.1 Introduction

This section presents an overview of the number of cabs in the country, identifies their principal characteristics, and their distribution by county.

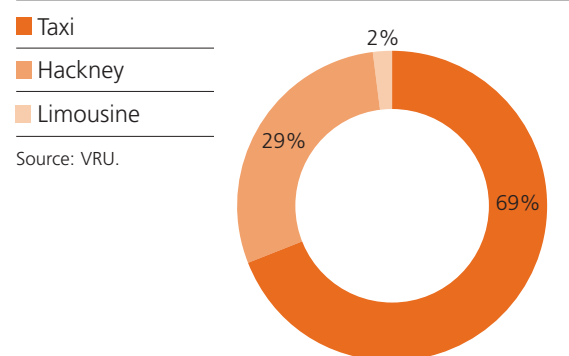
The data used are those published by the Vehicle Registration Unit of the Department of Environment, Heritage and Local Government. The Vehicle Registration Unit (VRU) is responsible for the taxation of all vehicles. It issues Vehicle Licensing Certificates to owners of newly registered vehicles and to new owners of previously registered vehicles. It also issues motor tax reminders and renewal notices to owners of vehicles. This source is used as it provides data extending back a significant number of years, permitting the analysis of trends.<sup>7</sup>

## 3.2 National trends in cab numbers

According to the Vehicle Registration Unit, there were a total of 20,744 cabs in the country in 2004. Of these, more than two-thirds were taxis (68.3 per cent), 29.2 per cent were hackneys and only 2.5 per cent were limousines (See Figure 3.1).

The number of cabs increased rapidly over the last decade. Between 1993 and 2004, the total number of cabs more than trebled from 6,144 to 20,744. The major increase was in the number of taxis, which increased six-fold from 2,726 to 14,171. The increase in taxi numbers was particularly pronounced since liberalisation, while hackney numbers began to decline, (see Table 3.1 overleaf). The result is that the hackney share of the market has declined from 51 per cent in 1993 to 29.2 per cent in 2004, although numbers have increased in absolute terms over that period. Limousines have been separately identified since the separate class of limousine was introduced in 2000. There were 516 limousines in the country in 2004.

Figure 3.1: Breakdown of cabs in use in 2004



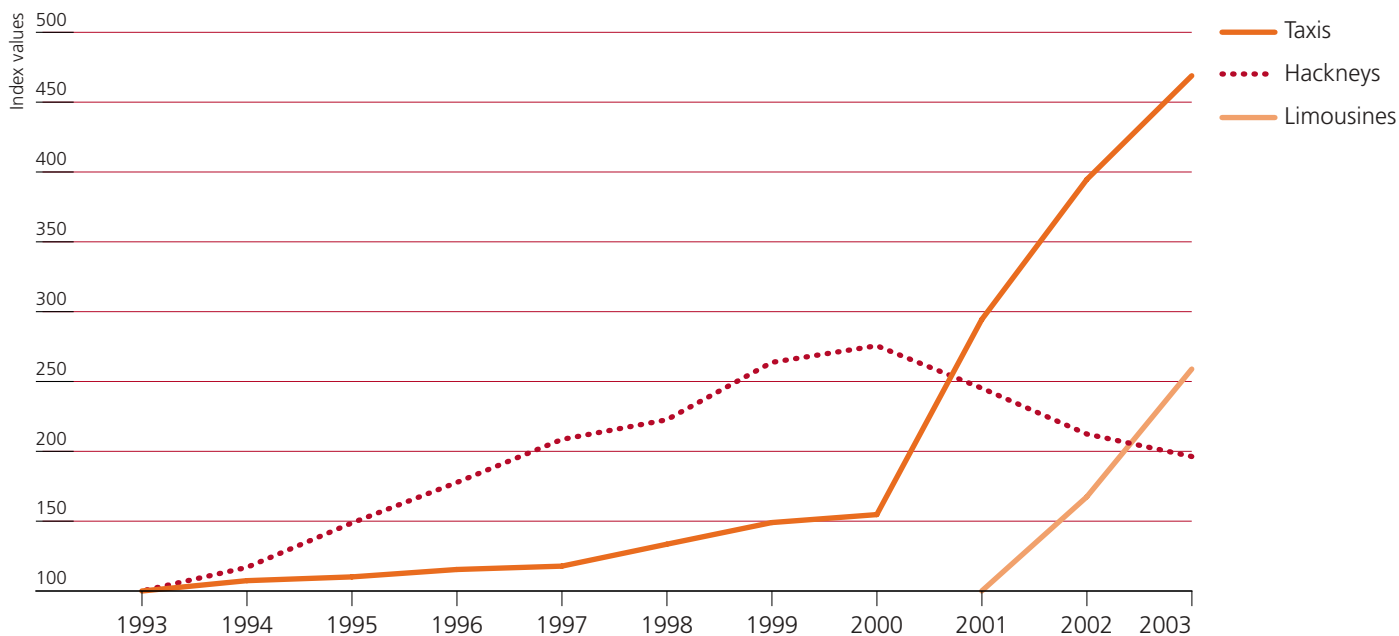
<sup>7</sup> Other sources of data are the licensing authority figures and these are provided by the National Car Testing Service. The VRU figures are close to those emanating from the licensing authorities.

Table 3.1: Number of cabs in use, 1993–2004

Year	Taxi	Hackney	Limousine	Total
1993	2,726	3,418	—	6,144
1994	2,929	3,996	—	6,925
1995	3,002	5,084	—	8,086
1996	3,145	6,074	—	9,219
1997	3,212	7,128	—	10,340
1998	3,639	7,610	—	11,249
1999	4,063	9,013	—	13,076
2000	4,218	9,419	—	13,637
2001	8,025	8,381	141	16,547
2002	10,757	7,259	236	18,252
2003	12,781	6,710	365	19,856
2004	14,171	6,057	516	20,744

Source: VRU.  
Note: Wheelchair accessible taxis are included under the general heading of Taxi.

Figure 3.2: Index of cabs licensed, 1993–2003 (1993=100)



Source: VRU, Goodbody Economic Consultants.

Table 3.2: Breakdown of taxis and hackneys by engine cubic capacity, 2004

Engine capacity	Taxi		Hackney		Limousine		Total	
	Number	%	Number	%	Number	%	Number	%
Not exceeding 900	0	0.0	11	0.2	1	0.2	12	0.0
901–1000	0	0.0	0	0.0	0	0.0	0	0.0
1001–1100	0	0.0	0	0.0	0	0.0	0	0.0
1101–1200	3	0.0	1	0.0	0	0.0	4	0.0
1201–1300	54	0.4	24	0.4	0	0.0	78	0.4
1301–1400	856	6.0	266	4.4	0	0.0	1,122	5.4
1401–1500	323	2.3	82	1.4	0	0.0	405	2.0
1501–1600	3,077	21.7	842	13.9	0	0.0	3,919	18.9
1601–1700	50	0.3	39	0.6	0	0.0	89	0.4
1701–1800	1,033	7.3	287	4.7	1	0.2	1,321	6.4
1801–1900	1,740	12.3	754	12.5	3	0.6	2,497	12.0
1901–2000	4,614	32.6	1,918	31.7	78	15.1	6,610	31.9
2001–2500	1,882	13.3	1,388	22.9	141	27.3	3,411	16.4
2501 and over	539	3.8	445	7.3	292	56.6	1,276	6.1
<b>Total</b>	<b>14,171</b>	<b>100.0</b>	<b>6,057</b>	<b>100.0</b>	<b>516</b>	<b>100.0</b>	<b>20,744</b>	<b>100</b>

Source: Special analysis of the VRU.

### 3.3 Characteristics of cabs

Vehicle Registration Unit data contain information on the engine capacity of cabs, their year of first registration, and the fuel used.

#### 3.3.1 Engine capacity

Table 3.2 provides a breakdown of taxis and hackneys by engine cubic capacity for the year 2004. There are virtually no taxis below 1200 cc, with 49.7 per cent above 1900cc. Just over 91 per cent of taxis exceed 1500cc.

Hackneys are more likely to be larger vehicles than taxis. Some 62 per cent exceed 1900cc, and 93.6 per cent exceed 1500cc.

#### 3.3.2 Type of fuel

Of the 14,171 taxis, 7,239 or 51 per cent run on petrol. Whereas taxis are almost equally divided between petrol and diesel, the majority of hackneys run on diesel (62.2 per cent). Limousines run on predominantly petrol (68.0 per cent).

#### 3.3.3 Age or year of first registration

Table 3.4 presents data on cabs by year of first registration. With regard to taxis, their median age is just over 6 years.<sup>8</sup> In 2004, only 489 taxis were bought new, representing just 3.5 per cent of all taxis. This is a far lower proportion than for private cars, where new purchase typically represents approximately 10 per cent of the total stock.

Hackneys are even more aged: the median age is just under 7 years. Only 218 hackneys were bought new in 2004, representing 3.6 per cent of the hackney fleet.

Limousines exhibit similar characteristics, although there is a higher proportion of very old vehicles in the limousine fleet, no doubt reflecting the presence of vintage vehicles.

<sup>8</sup> Counting vehicles registered in 2004 as one year old.

Table 3.3: Number of cabs by type of fuel, 2004

Type of fuel	Taxi		Hackney		Limousine	
	Number	%	Number	%	Number	%
Petrol	7,239	51.1	2,290	37.8	351	68.0
Diesel	6,932	48.9	3,765	62.2	165	32.0
Other	0	0.0	2	0.0	0	0.0
<b>Total</b>	<b>14,171</b>	<b>100</b>	<b>6,057</b>	<b>100</b>	<b>516</b>	<b>100</b>

Source: Special Analysis of the VRU.

Table 3.4: Number of cabs by age (or year of first registration)

Year of first registration	Taxi		Hackney		Limousine		Total	
	Number	%	Number	%	Number	%	Number	%
2004	489	3.4	218	3.6	51	9.9	758	3.7
2003	553	3.9	235	3.9	37	7.2	825	4.0
2002	891	6.3	326	5.4	36	7.0	1253	6.0
2001	1,283	9.0	449	7.4	45	8.7	1,777	8.6
2000	1,752	12.4	596	9.8	48	9.3	2,396	11.6
1999	1,795	12.7	635	10.5	46	8.9	2,476	11.9
1998	1,809	12.8	696	11.5	34	6.6	2,539	12.2
1997	1,431	10.1	673	11.1	49	9.5	2,153	10.4
1996	1,213	8.6	578	9.5	22	4.3	1,813	8.7
1995	1,020	7.2	509	8.4	26	5.0	1,555	7.5
1994	806	5.7	388	6.4	16	3.1	1210	5.8
1993	488	3.4	287	4.7	13	2.5	788	3.8
1992	300	2.1	185	3.1	15	2.9	500	2.4
1991	143	1.0	91	1.5	7	1.4	241	1.2
1990	108	0.8	60	1.0	12	2.3	180	0.9
1989	47	0.3	28	0.5	9	1.7	84	0.4
<=1988	43	0.3	103	1.7	50	9.7	196	0.9
<b>Total</b>	<b>14,171</b>	<b>100</b>	<b>6,057</b>	<b>100</b>	<b>516</b>	<b>100</b>	<b>20,744</b>	<b>100</b>

Source: VRU.

Table 3.5: Number of cabs by local authority area, 2002

County	Taxi	Hackney	Limousine	Total	Cabs/1000
Carlow	52	88	2	142	3.1
Cavan	9	92	0	101	1.8
Clare	107	288	6	401	3.9
Cork	665	905	20	1,590	3.6
Donegal	105	309	2	416	3.0
Dublin	7,270	1,987	109	9,366	8.3
Galway	365	428	13	806	3.9
Kerry	106	309	8	423	3.2
Kildare	279	432	18	729	4.4
Kilkenny	82	96	1	179	2.2
Laois	49	89	2	140	2.4
Leitrim	3	33	1	37	1.4
Limerick	374	299	8	681	3.9
Longford	34	38	1	73	2.3
Louth	185	165	8	358	3.5
Mayo	100	214	2	316	2.7
Meath	395	226	14	635	4.7
Monaghan	1	111	1	113	2.1
Offaly	10	142	0	152	2.4
Roscommon	17	87	1	105	2.0
Sligo	65	80	2	147	2.5
Tipperary N.R	10	111	1	122	2.0
Tipperary S.R	9	170	0	179	2.3
Waterford	127	149	4	280	2.8
Westmeath	199	65	1	265	3.7
Wexford	26	138	3	167	1.4
Wicklow	113	208	8	329	2.9

Source: VRU and Goodbody Economic Consultants.

### 3.4 Distribution of cabs by area

Table 3.5 presents data on cabs by local authority area. According to these statistics, Dublin accounts for over 50 per cent of the total number of cabs and two-thirds of all taxis. These figures may tend to underestimate the true number of cabs operating in Dublin. This is because vehicles are normally licensed for road tax in the local authority area in which the vehicle owner is resident. Thus, some taxi drivers that are resident in the counties of Wicklow, Meath and Kildare could be operating in Dublin.<sup>9</sup>

A good indicator of the relative supply of cabs by county is the number of cabs per 1,000 persons in the population. There are 4.7 cabs per thousand persons in the country as a whole. On a county basis, this varies from a low of 1.4 cabs per thousand in Wexford and Leitrim to a high of 8.3 cabs in Dublin. The number of cabs per thousand in Dublin is significantly above the next highest, which is Meath with 4.7 cabs per thousand.

### 3.5 Conclusions

- Cab numbers have grown significantly over the last decade, to stand at 20,744 in 2004;
- Since liberalisation of the taxi market in 2000, there has been a rapid increase in the number of cabs, particularly the number of taxis, which more than trebled between 2000 and 2004;
- Taxis are now the predominant type of cab whereas before liberalisation hackneys had the larger share;
- The vast bulk of cabs are above 1500 cc engine capacity, with a majority above 1900cc;
- Taxis are split half and half between usage of petrol and diesel, whereas the majority of hackneys run on diesel;
- Very few cabs are bought new;
- Half of all cabs are in Dublin, which has the highest per capita cab population.

<sup>9</sup> The number of cabs licensed by Dublin City Council in mid-2004 was 10,748.

## 4

## Taximeter areas

## 4.1 Introduction

This section of the report describes the taximeter areas that have been designated in Ireland, and assesses their operation. A taximeter area is a designated area within which taxis can operate. Taxis can ply for hire on street within the taximeter area and stand at ranks, where the latter are provided.

While taxis are operating within the taximeter area maximum fare control is implemented. Taxis are thus obliged to calculate the fare by using a meter, which indicates the maximum fare chargeable at the end of the trip. The driver can charge a reduced amount if he or she so wishes, but the fare displayed is the maximum that can be charged. If a trip takes the taxi beyond the taximeter area, the driver is not obliged to use the meter, as the trip effectively becomes a private hire. In this instance, the fare should be agreed at the commencement of the hiring. If a trip involves a taxi travelling into an adjoining taximeter area, the fare must be calculated on the meter. However, the taxi driver is not obliged to carry a passenger outside his or her taximeter area. Taxis are not permitted to ply for hire within a neighbouring taximeter area.

## 4.2 Designating taximeter areas

Under the current public service vehicle regulations, individual local authorities are licensing authorities for the purpose of granting of taxi, wheelchair accessible taxi, hackney and limousine licences. However, in the case of taxis, for a local authority to grant licences, they must declare a taximeter area. Under current legislation,<sup>10</sup> local authorities are empowered to declare their functional area, or a specific part of it, to be a taximeter area. The legislation also permits local authorities to include part or all of the functional area of another authority within

the taximeter area, but only with the agreement of the latter.

A local authority may declare an area or a specific part of their functional area to be a taximeter area if they feel that there is a need for on street public hire in that area. In conjunction with this decision, the local authority will also determine the maximum taxi fares to apply to that area and may decide to make 'appointed stand bye-laws' to provide for the location of taxi ranks. Once the taximeter area has been declared and the maximum fare structure set, the local authority can process applications for the granting of taxi licences.

## 4.3 Current taximeter areas

The power to declare taximeter areas was given to local authorities on a discretionary basis, so they are not obliged to create taximeter areas. Furthermore, where a local authority feels it necessary to include part or all of the functional area of an adjoining local authority, this occurs with the agreement of the local authority of that area. In some areas, there has been local resistance from established hackney operators. For these reasons, not all urban areas are taximeter areas.

There are currently 34 taximeter areas in operation across Ireland. Table 4.1 overleaf indicates the cities and towns that have designated taximeter areas. They are mapped in Figure 4.1. The table also gives

<sup>10</sup> The Road Traffic (Public Service Vehicles) (Amendment) Regulations, 1995 (S. I. 136).

an indication of the local populations. It is sorted by size of population, although it should be noted that this is not an indication of the size of the actual taximeter area, or indeed the number of taxis in operation. Although the majority of areas with designated taximeter areas have populations of 10,000 or more, it is interesting to note that smaller towns with populations of fewer than 7,500, such as Thurles, Tipperary Town, Mhuinbeag and Tullow also have designated areas.<sup>11</sup>

#### 4.4 Licences issued

All of the local authorities that have designated taximeter areas were contacted and asked for data relating to the number of licences in operation in their area. Of the thirty-three local authorities, data was received back from thirty-one. Table 4.2 overleaf indicates the number of SPSV licences in operation in each of these areas.

Of the local authorities that provided data, the majority (77.4 per cent) have more licensed taxis in operation than licensed hackneys. Interestingly, in Castlebar, Navan, Tralee and Mullingar, the only licensed vehicles in operation are taxis, with the exception of one limousine operating in Castlebar.

Case studies carried out on the industry in Cork and Sligo also indicated that where taxi licences are available, taxis eventually outnumber hackneys.

The case study carried out in Sligo indicated that taxi licences were not issued there until 1989. Throughout the 1990s, the number of licensed taxis in operation remained static at 25. In 1999, the taxi and hackney market was 32.5 per cent taxi and 67.5 per cent hackney. After liberalisation of the market in 2000, a shift began to occur, as taxi licences became more accessible. Now, in 2005, the market is 86.4 per cent taxi and 13.6 per cent hackney.

Local industry sources believe that it was not just a simple shift of hackney licence-holders opting for taxi licences. Previous taxi drivers, who had driven other peoples' taxis in the past, were now in a position to invest in their own licence. Furthermore, hackney drivers, previously employed to drive other peoples' vehicles, also chose to invest in a taxi licence. Both of these groups of drivers had opted not to buy hackney licences pre-liberalisation, indicating a preference for the taxi licence.

**Table 4.1: Populations of towns and cities with taximeter areas**

Towns/cities	Population
Greater Dublin Area	1,004,614
Cork city	186,239
Limerick city	86,998
Galway city	66,163
Waterford city	46,736
Westmeath rural Westmeath excluding Athlone and Mullingar	40,301
Dundalk	32,505
Drogheda	31,020
Bray	30,951
Longford county excluding Longford town	23,511
Ennis	22,051
Tralee	21,987
Kilkenny town	20,735
Sligo town	19,735
Navan	19,417
Carlow town	18,487
Naas	18,288
Wexford	17,235
Athlone	15,936
Mullingar	15,621
Letterkenny	15,231
Killarney	13,137
Portlaoise	12,127
Castlebar	11,371
Cobh	9,811
Ballina	9,647
Mallow	8,937
Longford town	7,557
Dungarvan	7,452
Thurles	7,425
Tipperary town	4,964
Mhuinbeag	2,728
Tullow	2,417
Donegal	2,453

Note: Population figures include the suburbs or environs of each town.

<sup>11</sup> Although they are two separate taximeter areas, Mhuinbeag and Tullow operate using the same fare card issued by Carlow County Council.

Source: Department of Transport and Census 2002 (CSO).

Figure 4.1: Towns with taximeter areas



Table 4.2: Taximeter areas by number of SPSV licences in operation

Taximeter area	Wheelchair accessible taxis	Ordinary taxis	Hackneys	Limousines	Total SPSVs
Athlone	3	80	15	5	103
Ballina	2	52	8	4	66
Bray	7	43	69	35	154
Carlow town	22	48	26	1	97
Castlebar	4	84	0	1	89
<b>Cork city</b>	50	800	251	66	1,167
Donegal	2	22	82	0	106
Drogheda	15	153	29	12	209
<b>Dublin</b>	930	8,969	606	381	10,886
Dundalk	16	99	160	21	296
Dungarvan	2	21	5	3	31
Ennis	4	104	21	2	131
<b>Galway city</b>	46	423	53	17	539
Kilkenny town	9	105	18	1	133
Killarney	9	79	11	23	122
<b>Limerick city</b>	14	451	72	13	550
Longford county	0	3	19	2	24
Longford town	6	46	2	0	54
Mallow	2	37	4	1	44
Mhuinbeag and Tullow	1	2	17	7	27
Mullingar	16	86	0	0	102
Naas	12	78	15	5	110
Navan	12	156	0	0	168
Portlaoise	10	57	70	7	144
Sligo Town	4	98	16	4	122
Thurles	0	11	22	3	36
Tipperary town	0	5	4	1	10
Tralee	4	75	0	0	79
<b>Waterford city</b>	22	157	39	26	244
Westmeath (rural)	5	13	18	6	42
Wexford	17	13	7	0	37
<b>Totals</b>	<b>1,246</b>	<b>12,370</b>	<b>1,659</b>	<b>647</b>	<b>15,922</b>

Note 1: Totals relate to data provided by 31 licensing authorities. Data does not include figures for Cobh Town Council or Letterkenny Town Council.

Note 2: The hackney data contained in the table only refers to hackneys licensed by local authorities with taximeter areas.

The case study carried out in Cork indicated a similar occurrence there, post-market liberalisation. In December 2000, there were 291 taxis in operation and 488 hackneys, making the market 37.4 per cent taxi and 62.6 per cent hackney. For two years following liberalisation there was a marked fall in the number of hackney licences issued and this was mirrored by only a slightly larger increase in the number of taxi licences issued, implying a shift of licence holders from the hackney market into the taxi market. In the years following, the number of hackney licences in operation has been fairly constant at around 250. At the time of writing, there are 850 taxis in operation in Cork, compared to 251 hackneys, making the market 77.2 per cent taxi and 22.8 per cent hackney. The majority of new entrants to the cab market are applying for taxi licences rather than hackney licences.

#### 4.5 Scale of taximeter areas

When a taximeter area is designated, reasonable boundaries should be set that allow maximum fare control to be applied. Currently, the maximum fare that a taxi operating within a taximeter area can charge is the fare as set by the local authority and calculated by the meter. Drivers are entitled to reduce the amount if they so wish. However, if a trip takes them outside the taximeter area, this effectively becomes a private hire, and the fare must be agreed in advance, meaning that maximum fare control and use of the meter ends on leaving the taximeter area.

The boundaries of a number of existing taximeter areas have not moved with local development. As a result, there are taximeter areas that are so small in relation to their locality that the majority of trips go beyond the area and therefore the maximum fare does not apply to them. Examples of this can be seen in Carlow town, Naas and Mallow, where the taximeter areas are just 2.4 kilometres (1.5 miles) in radius. The populations of these towns are 18,487, 18,288 and 8,937 respectively. In other areas, such as Castlebar, Drogheda and Tralee, the taximeter

**Table 4.3: Towns with no designated taximeter area and populations >10,000**

Town	Population
Clonmel, County Tipperary	16,910
Newbridge, County Kildare	16,739
Celbridge, County Kildare	16,016
Leixlip, County Kildare	15,016
Greystones, County Wicklow	11,913
Carrigaline, County Cork	11,191
Tullamore, County Offaly	11,098
Maynooth, County Kildare	10,151

Source: Census 2002.

areas are even smaller in size and do not in any way reflect the actual settlement footprint of the town. Castlebar has a population of 11,371 and a taximeter area radius of 0.264 kilometres (0.16 miles) and Drogheda has a population 31,020 and a taximeter area radius of 0.2 kilometres (0.12 miles). Tralee, another significant town of 21,987 people, has a taximeter area radius of just 0.09 of a kilometre or 100 yards.

The impact of an inadequately designated taximeter area is that the majority of trips will go beyond the area and so maximum fares will not apply. In these situations the only real impact of declaring a taximeter area is that taxis can ply for hire on street and stand at ranks where available within the taximeter area.

## 4.6 Taxi ranks

According to the data returned by the local authorities, a typical rank will provide between five and ten spaces. For example, Mullingar has two ranks, each with an average of eight spaces. Ennis has three ranks each with an average of six spaces. In Dublin there are seventy-nine main ranks and twenty-three feeder ranks each with an average of 6.5 spaces.

The busiest times for taxis tend to be on Friday and Saturday nights. Many local authorities have also designated temporary ranks to cater for these periods. For example, in Dublin as well as the ranks mentioned above, there are an additional 6 evening and night time ranks and an extra 6 occasional ranks. In Waterford City, as well as the six full-time ranks there are a further six part-time ranks for use at night.

## 4.7 Issues for consideration

From Table 4.1, it may be deduced that 70.6 per cent of existing taximeter areas are located in towns or cities of 10,000 people or more. There are a number of other towns in Ireland that have populations of over 10,000 people, but that have not yet had a taximeter area designated. Table 4.3 above lists these towns.

A case study was carried out in Clonmel, a town of 16,910 people with no designated taximeter area and 49 hackneys in operation. Although hackneys are not legally permitted to ply for hire on street, a *de facto* rank has developed that operates mainly in the evenings. With public order being a priority for local Gardaí, particularly on weekend nights, the hackneys are generally seen to be providing a very necessary service. At the time of train arrivals, several hackneys also wait for potential custom at the railway station. It is clear that there is a degree of illegal operation of hackneys outside the major urban areas, and especially in those areas that are not taximeter areas.

## 4.8 Conclusions

There is a clear need to extend taxi services to the towns that do not have a designated taximeter area.

For many towns, the geographic area which is delineated as a taximeter area is either too small or does not reflect the local population settlement pattern, or both. This means that a majority of taxi trips have origins or destinations outside the taximeter area and are thus not fare controlled. Future designations of taximeter areas need to reflect the residential and commercial footprint of the town.

The adequacy of taxi ranks should also be reviewed. Greater use of temporary ranks, where permanent designation is not possible, should be considered.

# 5

## Demand for cab services

### 5.1 Introduction

Within the cab industry there are three discrete types of consumer: personal consumers, business users and tourists.

This section of the report profiles the demand for cab services by each of these consumer groups. Each of these groups includes people who use wheelchairs and people with other disabilities. Demand amongst these groups is considered separately throughout the section. The data in this section are drawn from the Household Survey, the Business Survey, the Tourist Survey and the Survey of People with Disabilities, all carried out in the first quarter of 2005.

### 5.2 Cab use

In 2005, 38.8 per cent of all adults had used a cab within the six months previous to the survey. The penetration of cabs is high relative to some other modes of transport. For example, as Table 5.1 below indicates, for the country as a whole, the same proportion of adults that had taken a taxi or hackney cab had also used local bus services. In Dublin, where there are substantial local bus services, a significant 45.8 per cent of adults reported using cab services in the last six months. Outside of Dublin, although the proportions were slightly smaller, the cab was still the form of transport with the highest incidence of use after the car and walking modes.

#### 5.2.1 Frequency of use

Of greater interest is the frequency with which cab users make cab trips. This is indicated in Table 5.2 below. The proportion of adults using cabs at least once a week is 52.9 per cent, with just over 16 per cent using them more often than once a week.

When frequency of cab use by adults is analysed by age group, it is evident that the younger age groups use them more often. Over 65 per cent of adults between the ages of 15 and 24 years use cabs weekly or more often. This proportion decreases steadily with age, but then increases again to 50.7 per cent for consumers aged 65 or above.

**Table 5.1: Distribution of adults by modes of transport used in last six months**

Method of transport	All adults (%)	Dublin (%)	Rest of Leinster (%)	Munster (%)	Connaught/ Ulster (%)
Bus (Local)	38.8	60.3	30.1	32.0	25.5
Bus/Coach	20.6	13.4	26.1	19.4	26.6
Luas	9.4	25.8	3.3	1.7	2.0
Train/DART/Arrow	21.2	20.8	22.4	23.9	16.4
Car	82.5	73.1	79.9	90.0	90.7
Motorbike/Moped	1.7	3.5	1.0	1.4	0.2
Bicycle	9.5	13.5	9.5	6.9	6.8
Taxi/Hackney cab	38.8	45.8	35.7	40.6	28.9
Walking (non-leisure)	39.4	40.0	42.2	35.5	40.5

Source: Based on the results of the Household Survey (2005).

Note 1: Totals do not add up as many respondents reported using more than one method of transport.

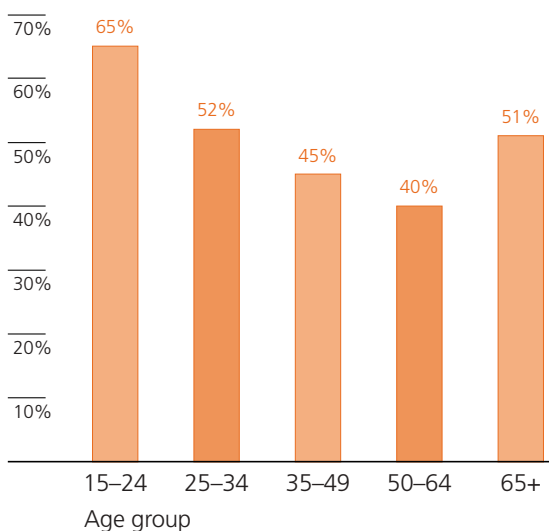
**Table 5.2: Distribution of adults by frequency of cab use**

Frequency of use	Proportion (%)
Daily/more often	2.1
Every 2–3 days	6.0
Every 4–5 days	8.1
Once a week	36.7
Once a month	23.5
Less often	23.6

Source: Based on the results of the Household Survey (2005).

**Figure 5.1 Cab users using cabs at least weekly by age group**

Source: Based on the results of the Household Survey (2005).



### 5.2.2 Structure of demand

Table 5.3 presents a breakdown of the cab market by how trips are arranged. The majority of trips (64.3 per cent) are arranged by telephone, as compared with 33.1 per cent on street and 2.6 per cent in hackney offices. The proportion of cabs that are hired on street in Dublin far exceeds that of other locations in Ireland. This is merely a reflection of the fact that Dublin has considerably more taxis in operation than hackneys. Hackneys, which may dominate the markets in other areas, are not legally permitted to ply for hire on street.

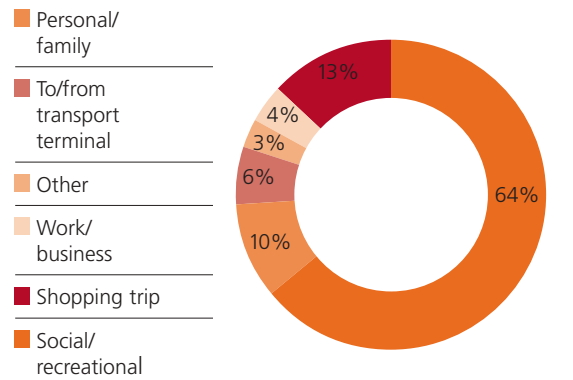
### 5.2.3 Journey purposes

Figure 5.2 indicates the breakdown of cab trips by the purpose of the journeys. Cab use is mainly for social and recreational purposes (64.3 per cent), followed by shopping trips (12.6 per cent). Business use is relatively low.

### 5.2.4 Patterns of cab use

Over 70 per cent of cab trips occur on a Friday or Saturday with just 13.6 per cent of trips occurring from Monday to Wednesday. This ties in with the fact that the main purposes of cab journeys are social outings or shopping trips.

Figure 5.2 Proportion of trips by purpose of journey



Source: Based on the results of the Household Survey (2005).

Table 5.4 on the next page indicates the breakdown of cab trips by the time of day that they are taken. Following the trends that younger people use cabs more often than older people and the most common purpose for a cab journey is social/recreational, the time of day when most cab trips are made is between midnight and 3am (28 per cent). A further 15.9 per cent of trips are made between 6pm and 9pm, which may reflect people going out on social outings or returning from late night shopping trips.

Table 5.3: Distribution of trips by how trips are arranged and geographical area

	All Adults (%)	Dublin (%)	Rest of Ireland (%)
Phone	64.3	52.6	70.5
<i>Phone from home</i>	39.4	42.1	37.8
<i>Phone from work</i>	2.3	4.0	1.0
<i>Phone (other)</i>	22.6	6.5	31.7
Street	33.1	47.4	25.5
<i>Queued at rank</i>	15.5	9.7	18.8
<i>Hailed on street</i>	17.6	37.7	6.7
Went to hackney office	2.6	0.0	4.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Survey (2005).

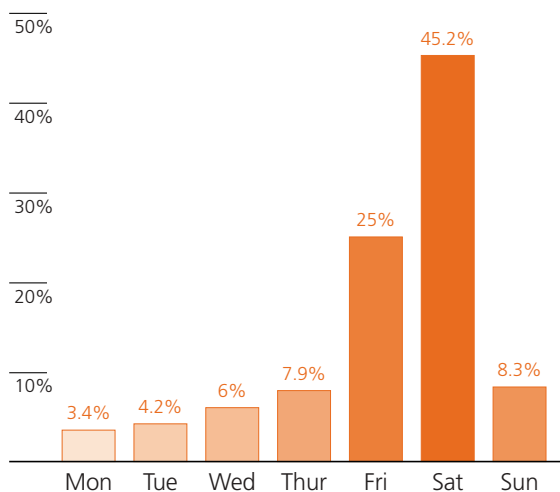
**Table 5.4: Distribution of trips by time of day trip taken and age of cab user**

Time of day	All adults (%)	15–35 years (%)	35+ years (%)
00:01–03:00 hours	28.0	34.6	18.6
03:01–06:00 hours	4.4	6.6	1.6
06:01–09:00 hours	4.6	4.2	5.1
09:01–12:00 hours	15.3	9.4	23.5
12:01–15:00 hours	15.4	11.5	20.8
15:01–18:00 hours	7.7	6.9	8.8
18:01–21:00 hours	15.9	16.2	15.5
21:01–00:00 hours	8.7	10.6	6.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Survey (2005).

**Figure 5.3 Distribution of trips by day of the week**

Source: Based on the results of the Household Survey (2005).



The pattern of cab use varies by age. Younger people (aged 15–34 years) use cabs most between midnight and 3am, whereas older people (35 years or older) use cabs most between 9am and noon and noon and 3pm.

### 5.2.5 Distances travelled

The majority of cab trips tend to be fairly short with the greatest proportion (38.1 per cent) of trips taken in a cab being between 1 and 3 miles. A further 21.4 per cent of trips are between 3 and 5 miles. Thus, almost two-thirds of trips are 5 miles or less.

The trends in distance travelled vary somewhat between geographical areas. In Dublin just over half (52.0 per cent) of trips are 5 miles or less. In Munster 79.6 per cent of trips are 5 miles or less, as are 72.8 per cent of cab trips in the Connaught/Ulster region. Interestingly, the highest proportion of trips taken that exceed ten miles are from Leinster (excluding Dublin). This may indicate the dominance of Dublin as a destination of trips from that area. (See Table 5.5 overleaf.)

Table 5.5: Distribution of trips by distance travelled and geographical area

Distance travelled	All adults (%)	Dublin (%)	Rest of Leinster (%)	Munster (%)	Connaught/ Ulster (%)
<1 mile	5.2	4.0	5.2	5.5	8.0
1–3 miles	38.1	19.3	41.8	57.2	40.0
3–5 miles	21.4	28.7	13.6	16.9	24.8
5–7 miles	17.2	26.2	13.1	12.2	11.2
7–10 miles	9.9	15.3	11.3	3.1	8.0
>10 miles	8.2	6.5	15.0	5.1	8.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Survey (2005).

### 5.3 Trends in cab use in Dublin

Similar household surveys of taxi and hackney cab use were undertaken in the Dublin area in 1997<sup>12</sup> and 2001,<sup>13</sup> enabling a comparison of results over time. For this reason, all of the data referred to in this section refer to the Dublin area only.

#### 5.3.1 Frequency of use

The frequency with which adults in Dublin use cabs has increased over the last number of years. In 1997, 42.6 per cent of adults in Dublin used cabs once a week or more often. This proportion increased to 51.0 per cent in 2001 and 51.4 per cent in 2005.

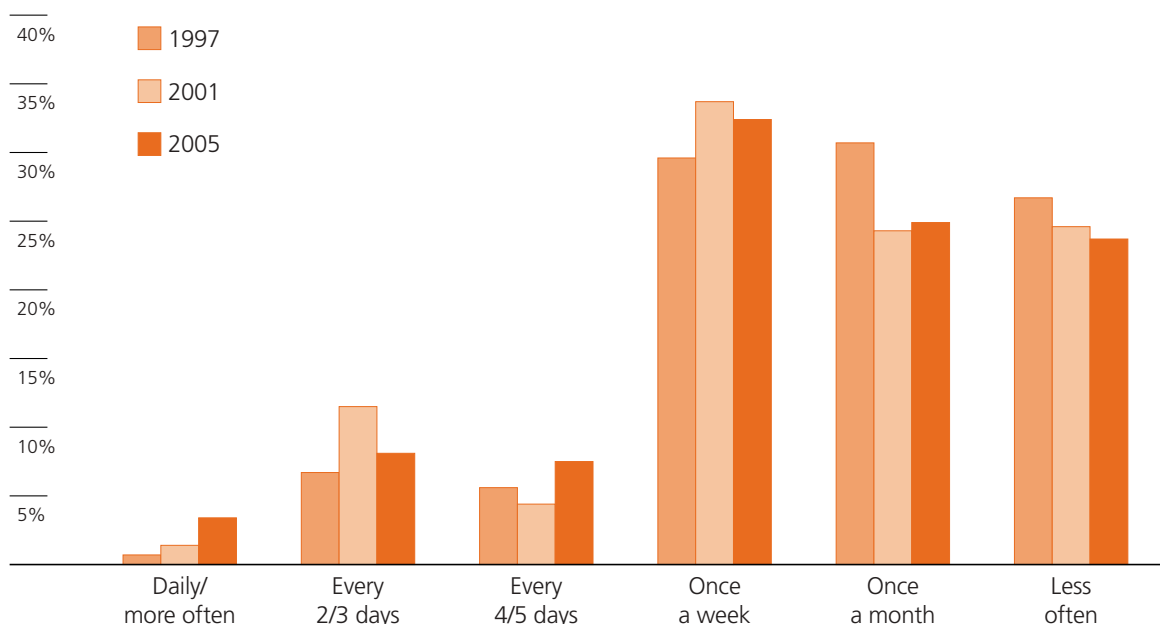
Within this group, there is also an increased intensity in the sub-groups of more frequent users.

#### 5.3.2 Structure of demand

The proportion of trips arranged by telephone in the Dublin area increased from 37.7 per cent in 2001 to 52.6 per cent in 2005. The greatest change was in the number of trips arranged by telephone from home, which increased in proportion by 15.7 percentage points, from 26.4 per cent to 42.1 per cent. This reflects the sharp drop in the proportion of taxis hired on ranks, which fell from 29.1 per cent in 2001 to 9.7 per cent in 2005.

Figure 5.4: Distribution of adults by frequency of cab use in the Dublin area: 1997, 2001 and 2005

Source: Based on the results of the Household Surveys.



<sup>12</sup> Review of the Taxi and Hackney Carriage Service in the Dublin Area, Dublin Corporation, Oscar Faber and Goodbody Economic Consultants, 1998.

<sup>13</sup> Review of the Taxi and Hackney Market 2001 – Demand and Supply, Dublin Corporation and Goodbody Economic Consultants 2001.

**Table 5.6: Distribution of trips in the Dublin area by method of hire: 2001 and 2005**

Method of hire	2001 (%)	2005 (%)
Phone	37.7	52.6
<i>Phone from home</i>	26.4	42.1
<i>Phone from work</i>	2.7	4.0
<i>Phone (other)</i>	8.6	6.5
Street	61.7	47.4
<i>Queued at rank</i>	29.1	9.7
<i>Hailed on street</i>	32.6	37.7
Other	0.6	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>

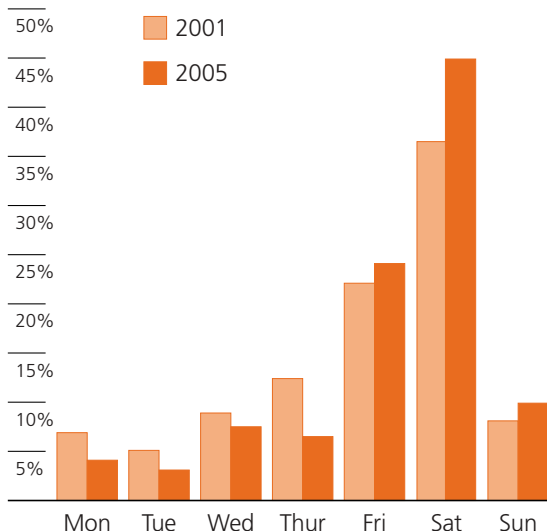
Source: Based on the results of the Household Surveys.

### 5.3.3 Journey purposes

While the main purpose of cab journeys has always been social/recreational, there has been a shift in other journey purposes. In 1997, 7.0 per cent of trips were taken in the course of work or business. This proportion increased to 9.0 per cent in 2001 but has since fallen to 4.3 per cent. Cab journeys taken as part of shopping trips on the other hand, increased from 6.0 per cent in 1997 to 10.4 per cent in 2001 and 12.6 per cent in 2005. The other notable change has been in the cab journeys taken on personal business or visiting friends and family.

**Figure 5.5: Distribution of trips in the Dublin area by day of the week, 2001 and 2005**

Source: Based on the results of the Household Surveys.



In 1997 these accounted for 17.0 per cent of all journeys, but now only account for 10.4 per cent of journeys.

### 5.3.4 Patterns of cab use

In 2001 58.6 per cent of trips were taken on Fridays and Saturdays, with a further 12.4 per cent taken on Thursdays. In 2005, the proportion of journeys taken on Fridays and Saturdays had increased to 69.0 per cent, and the proportion taken on Thursdays had decreased to 6.5 per cent.

**Table 5.7: Distribution of journeys in the Dublin area by purpose of journey: 1997, 2001 and 2005**

Purpose of journey	1997 (%)	2001 (%)	2005 (%)
Business/work	7.0	9.0	4.3
Shopping	6.0	10.4	12.6
Social/recreational	67.0	65.9	64.3
Personal/visiting friends and family	17.0	7.3	10.4
Travelling to transport terminals	—	5.7	5.7
Other	3.0	1.7	2.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Surveys.

Table 5.8: Distribution of trips in the Dublin area by time of day: 1997, 2001 and 2005

Time of day	1997 (%)	2001 (%)	2005 (%)
00:00–09:00	52.0	43.7	31.0
09:00–12:00	7.0	10.3	11.8
12:00–15:00	6.0	10.7	15.7
15:00–18:00	6.0	7.9	11.2
18:00–21:00	19.0	19.6	24.0
21:00–00:00	10.0	7.8	6.3
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Surveys.

Table 5.9: Distribution of trips in the Dublin area by distance travelled: 1997, 2001 and 2005

Distance travelled	1997 (%)	2001 (%)	2005 (%)
<1 mile	2.0	2.3	4.0
1–3 miles	18.0	26.6	19.3
3–5 miles	36.0	19.8	28.7
5–7 miles	24.0	17.2	26.2
7–10 miles	15.0	23.1	15.3
10+ miles	5.0	11.0	6.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Surveys.

The time of day when most trips are taken has always been between midnight and 9am, however the proportion decreased from 52.0 per cent in 1997 to 43.7 per cent in 2001, to 31.0 per cent in 2005. The greatest increase has been seen in the trips taken between noon and 3pm. Where these trips accounted for 6.0 per cent of all trips in 1997, they now account for 15.7 per cent. Trips taken between 6pm and 9pm have also increased from 19.0 per cent in 1997 to 24.0 per cent in 2005.

### 5.3.5 Distances travelled

Cab journey distances have not changed dramatically over the last number of years in the Dublin area. Trips of five miles or less accounted for 56.0 per cent of all trips in 1997 and accounted for 52.0 per cent in 2005. Journeys of up to seven miles accounted for 80.0 per cent of all trips in 1997 and for 78.2 per cent more recently. In 1997, journeys of ten miles or more accounted for just 5.0 per cent of all journeys, and this has not changed much with such journeys now accounting for only 6.5 per cent.

### 5.4 Cab use by businesses

The household survey of adults indicated a relatively small proportion of cab use in the course of work or business. However, people being interviewed at home may be more likely to recall a trip from home compared to a trip made as part of the working day. The data used in this section are drawn from the survey of businesses nationwide.

An indication of the frequency with which a business uses cab services is whether or not it holds an account with a dispatch company. Half of the businesses surveyed hold one or more accounts with dispatch companies. This proportion increases to 60.8 per cent in Dublin.

The majority of businesses (74.0 per cent) use taxi companies more often than hackney companies.

Figure 5.7 below gives an indication of the level of cab usage by businesses in Ireland. Over 20 per cent of businesses use one to two cabs every day. A further 21.8 per cent report using three or more cabs every day.

Figure 5.6: Proportion of businesses with one or more dispatch company accounts

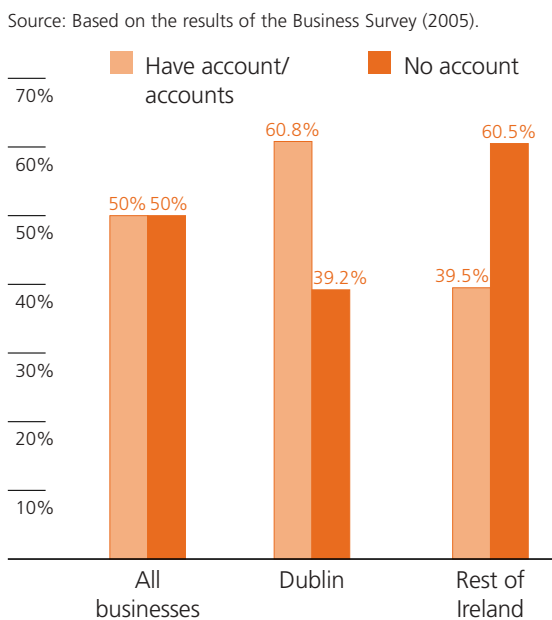
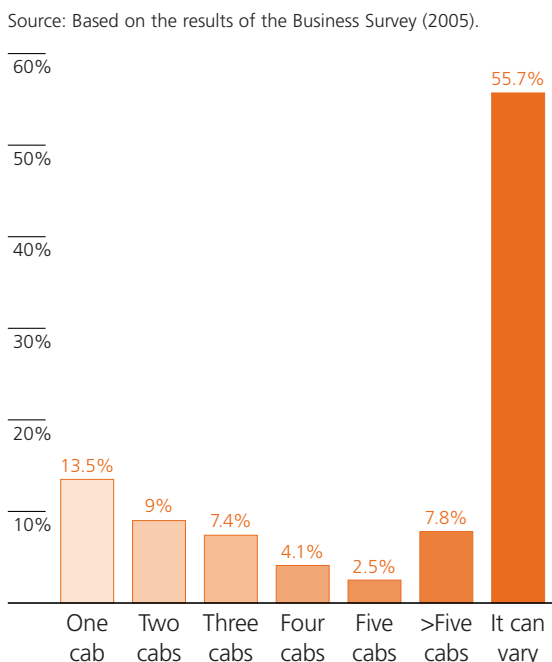


Table 5.10: Distribution of businesses by type of cab company used

Company type	Proportion (%)
Taxi company	74.0
Hackney company	31.2
Limousine company	3.2

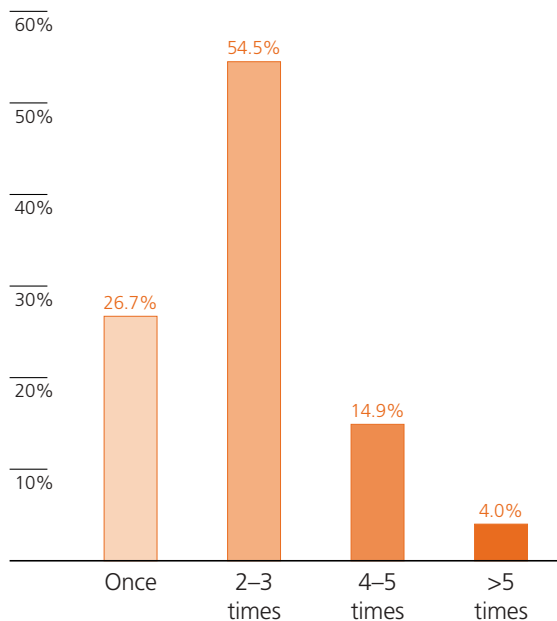
Source: Based on the results of the Business Survey (2005).  
Note: Totals do not add up as some companies reported using more than one company type.

Figure 5.7: Distribution of businesses by number of cabs ordered daily



**Figure 5.8: Distribution of tourists by frequency of cab use during stay**

Source: Based on findings of Tourist Survey (2005).



## 5.5 Cab use by tourists

In 2003 Ireland had almost 6.4 million overseas tourists.<sup>14</sup> With the taxi being the most widely used mode of public transport by tourists visiting Ireland, they form a substantial consumer group. Over 90 per cent of tourists report using a cab during their stay in Ireland, compared to just 28.7 per cent who report using a local bus.<sup>15</sup>

With lengths of stay ranging from weekend breaks to a week or a fortnight's holiday, 73.3 per cent of tourists use cabs more than once during their stay. Almost 55 per cent of tourists use them two to three times and 18.9 per cent use them more than three times.

Table 5.12 below shows that twice as many tourists hire cabs on the street as use the phone.

**Table 5.11: Distribution of tourists by mode of public transport used**

Mode of public transport	Proportion (%)
Bus (local)	28.7
Bus/coach	39.6
Luas	30.7
Train/DART/Arrow	17.8
Taxi	90.1

Source: Based on the results of the Tourist Survey (2005).

Note: Totals do not add up as some tourists had used more than one mode of public transport.

**Table 5.12: Distribution of tourists by how cab trips are arranged**

Method of hire	All tourists (%)
Phone	31.7
Street	74.3
<i>Queued at rank</i>	34.7
<i>Hailed on street</i>	39.6

Source: Based on findings of the Tourist Survey (2005).

Note: Totals do not add up as some tourists had used more than one means of arranging their trip.

<sup>14</sup> CSO Principle Statistics: Visitors to Ireland – Estimated number of overseas visitors 1999–2003.

<sup>15</sup> In interpreting this figure, the small scale of the tourist survey should be noted.

**Table 5.13: Frequency of cab use by people with disabilities and the general population**

Frequency of use	People with disabilities (%)	People with disabilities who use wheelchairs (%)	General population (%)
Daily or more often	2.6	6.3	2.1
Every 2–3 days	6.8	10.7	6.0
Every 4–5 days	6.0	8.5	8.1
Once a week	17.1	14.9	36.7
Once a month	19.7	19.1	23.5
Less often	47.8	40.5	23.6
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the findings of the Survey of People with Disabilities (2005).

### 5.6 Cab use by people with disabilities

Cab use by people with disabilities is low, particularly when compared to use by the general population as discussed in Section 5.2 above. As Table 5.13 indicates, 47.8 per cent of all people with disabilities make cab journeys less often than once a month. This compares to just 23.6 per cent of the general population. The proportion of people with disabilities who use cabs more often than once a week is just 15.4 per cent, although this increases to 25.4 per cent for people who use wheelchairs.

A survey of people with visual impairments was also carried out. Although the response rate was not high enough to enable a detailed analysis of cab use by this group of consumers, the indication is that people who are visually impaired use cabs as often as, if not more than, the general population.

People with disabilities were also asked about the factors that inhibit their use of cabs. The greatest proportion (43.0 per cent) indicated that the price of taking cabs acted as a deterrent, and a further 33.3 per cent reported that their low usage was because of an absence of services in their area. A similar proportion (31.1 per cent) also reported a lack of services from wheelchair accessible cabs.

The quality of cab services delivered to people with disabilities is discussed in more detail in Section 6.5.

**Table 5.14: Distribution of people with disabilities by factors inhibiting cab usage**

Inhibiting factor	People with disabilities (%)
Price	43.0
Absence of service	33.3
Lack of services from WATs*	31.1
Attitude of drivers and cab companies	16.3
<b>Other</b>	<b>15.5</b>

Source: Based on the findings of the Survey of People with Disabilities (2005).

Note: Totals do not add up as some respondents listed more than one factor.

\* Wheelchair accessible taxis.

## 5.7 Summary

Cab usage is high among personal consumers, business users and tourists. Almost 40 per cent of all adults use cabs and of those, 53.0 per cent use them once a week or more often. Roughly one-third of businesses use more than one cab every day. Over 90 per cent of tourists surveyed report using a cab during their stay in Ireland.

Overall, cab use by people with disabilities is lower than the general population with 47.8 per cent using them less often than once a month. However for people who use wheelchairs, frequency of use is more intense with 25.4 per cent using cabs more often than once a week. The greatest deterrent for people with disabilities is the cost of cab fares followed by availability of services.

The busiest days of the week for cab usage are Fridays (25.0 per cent) and Saturdays (45.2 per cent), and the busiest time of the day is between midnight and 3am, although this does vary depending on the age of the cab user. Young people use cabs more often and are more likely to take them late at night.

The purpose of most cab trips is social or entertainment (64.3 per cent), followed by shopping trips (12.6 per cent). 64.3 per cent of all cabs are hired over the phone. The majority of trips (64.7 per cent) are five miles or less, with only 8.2 per cent exceeding ten miles.

In Dublin, the frequency with which adults use cabs has increased somewhat over the last number of years. The proportion of adults in Dublin using a cab once a week or more often has grown from 42.6 per cent in 1997 to 51.4 per cent in 2005.

There has been a shift in the method of hire used by adults in Dublin with 52.6 per cent of them now arranging cab trips over the phone, compared to 37.7 per cent in 2001.

# 6

## Quality of cab services

### 6.1 Introduction

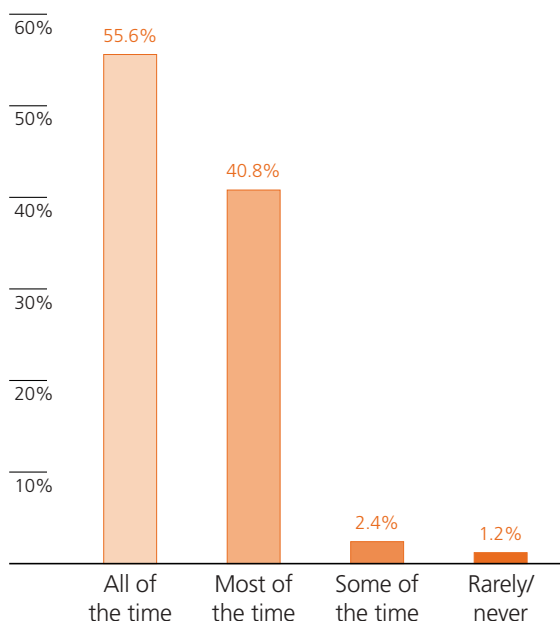
This section sets out the quality of service offered by cabs as perceived by personal consumers, business users, tourists and people with disabilities. Issues discussed include waiting times, availability of cabs, value for money and the changes that have occurred in the quality of services in Dublin over recent years.

### 6.2 Waiting times

Waiting times relate not only to the length of time it takes to get a cab on street, be it by hailing or at a rank, but can also occur when a consumer phones a cab company and requests a cab immediately.

**Figure 6.1: Distribution of businesses by frequency with which cabs ordered arrive within a reasonable time**

Source: Based on the results of the Business Survey (2005).



As Table 6.1 indicates, waiting times in Ireland are low with over one-third of consumers waiting less than five minutes for a cab, and 13.3 per cent getting one immediately. Fewer than 11.0 per cent of consumers experience waits of more than twenty minutes.

This is further illustrated in Figure 6.1 below which depicts the distribution of businesses by their waiting time experiences. Over half of the businesses surveyed reported that cabs ordered always arrive within a reasonable time. A further 40.8 per cent reported that cabs ordered usually arrive within a reasonable time.

**Table 6.1: Distribution of adults by length of waiting times**

Length of wait	All adults (%)
No wait	13.3
Less than 5 minutes	21.3
5–10 minutes	32.1
11–20 minutes	23.4
21–30 minutes	6.0
31–60 minutes	2.7
More than 60 mins	1.2
<b>Total</b>	<b>100.0</b>

Source: Based on the results of the Household Survey (2005).

**Table 6.2: Times of the day when most difficulties/delays experienced**

	Total Sample (%)	Dublin (%)	Rest of Ireland (%)
Before 8am	6.8	7.1	6.6
8am–10am	12.1	14.3	9.8
10am–12 noon	0.0	0.0	0.0
12 noon–2pm	15.9	17.1	14.8
2pm–4pm	7.6	8.6	4.9
4pm–6pm	60.6	62.9	57.4
After 6pm	21.2	17.1	26.2

Source: Based on the results of the Business Survey (2005).

Note: Totals do not add up as some respondents reported more than one difficult time of day.

The time of day when businesses experience most delays is in the late afternoon between 4pm and 6pm, followed by the evening. The least delays are experienced in the late morning between 10am and noon. There are no significant differences between Dublin and the rest of Ireland except that Dublin business users experience slightly more delays early to mid-morning.

### 6.3 Consumer perceptions

In general, consumers seem to be reasonably happy with the levels of service that cabs provide. As part of the Household Survey, personal consumers were asked the extent to which they agreed or disagreed with a number of statements relating to cab services. The majority of adults are quite satisfied with the

overall level of service provided, as well as vehicle quality, vehicle cleanliness and the helpfulness of drivers. This is indicated in Table 6.3 below.

Consumers were asked whether cabs were easily available at busy periods, with the results as set out in Figure 6.2 overleaf. While 46.2 per cent of adults supported the view that cabs are generally readily available, 37.1 per cent were in some level of disagreement.

Over half of consumers consider that they are getting good value for money with just over a quarter taking the opposite view. The proportion of consumers who disagreed increased to 37.8 per cent in Dublin, but this was lower in the other areas where it fell to 19.7 per cent in the rest of Leinster and 12.8 per cent in Connaught/Ulster.

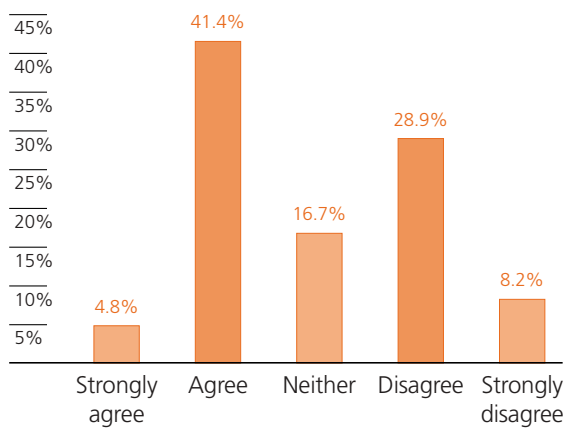
**Table 6.3: Consumer perceptions of cab services**

	Strongly agree (%)	Agree (%)	Neither agree nor disagree (%)	Disagree (%)	Strongly Disagree (%)
Cabs generally provide a good service	17.5	73.8	5.7	2.5	0.5
Cab vehicles are of good quality	13.6	71.3	9.1	5.5	0.5
Cab vehicles are generally clean and tidy	14.6	73.4	7.1	4.8	0.1
Drivers are generally helpful and friendly	17.3	67.4	10.9	3.1	1.3

Source: Based on findings of the Household Survey (2005).

**Figure 6.2: Consumer perceptions of the availability of cabs**

Cabs can be hired easily at busy periods



Source: Based on the results of the Household Survey (2005).

Consumers were also asked about the ease with which fares are calculated. Over one-fifth of adults did not consider the calculation of fares to be easy to understand. This proportion increased to just over a quarter in Dublin and 29.3 per cent in Connaught/Ulster. In Leinster (excluding Dublin) only 17.3 per cent were of this opinion.

Taxis are legally required to have a fare card on display inside the vehicle where a passenger can easily see it. Just over three-quarters of adults are in some level of agreement that fare cards are usually displayed clearly inside the cab, compared to 13.0 per cent who disagree. In Leinster (excluding Dublin) the proportion of adults who disagree falls to 5.3 per cent, which is in contrast to Connaught/Ulster where it increases considerably to 28.2 per cent.

**Table 6.4: Distribution of adults by perception of value for money**

Taxis/hackneys offer good value for money	All respondents (%)	Dublin (%)	Rest of Leinster (%)	Munster (%)	Connaught/Ulster (%)
Agree strongly	6.5	7.1	9.1	3.1	7.2
Agree	51.8	41.2	51.5	57.1	68.8
Neither	15.2	13.9	19.7	15.0	11.2
Disagree	20.8	27.3	16.8	20.1	12.0
Disagree strongly	5.7	10.5	2.9	4.7	0.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Survey (2005).

**Table 6.5: Distribution of adults by perception of ease with which fares are calculated**

How taxi/hackney fares are calculated is easy to understand	All adults (%)	Dublin (%)	Rest of Leinster (%)	Munster (%)	Connaught/Ulster (%)
Agree strongly	10.1	11.4	9.7	5.4	16.3
Agree	52.7	51.4	58.0	53.3	46.3
Neither	14.6	11.1	15.0	22.0	8.1
Disagree	18.8	19.7	15.9	16.9	25.2
Disagree strongly	3.8	6.4	1.4	2.4	4.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on findings of the Household Survey (2005).

**Table 6.6: Distribution of adults by perception of display of fare cards**

Taxi fare cards are usually displayed clearly inside the cab	All adults (%)	Dublin (%)	Rest of Leinster (%)	Munster (%)	Connaught/ Ulster (%)
Agree strongly	14.6	18.1	12.6	10.3	17.7
Agree	60.9	62.2	72.4	58.5	43.6
Neither	11.5	8.0	9.7	17.8	10.5
Disagree	10.7	8.0	4.3	12.2	25.8
Disagree strongly	2.3	3.7	1.0	1.2	2.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the findings of the Household Survey (2005).

Business users are also reasonably happy with the overall level of service offered by cabs in Ireland. When a business user is unhappy on an ongoing basis with the level of service that they receive from cabs, they will invariably change cab company. The main reasons given by businesses that have had to change cab company are reliability (20.8 per cent), poor service (19.4 per cent), and availability of cars (16.7 per cent).

Tourists were asked how taxi services in Ireland compared to those in their own country. In terms of the availability of taxis, 49.0 per cent felt that there was no difference between the countries, 17.3 per cent felt that the service in Ireland was better and

33.7 per cent that their own country was better. This may reflect the actual situation between countries, but it could be argued that tourists would be more familiar with taxi ranks and local cab firms in their own country than they would in Ireland. The response to other aspects of the service suggests that most respondents who believed that there was a difference between taxi services in Ireland and that of their own country, believed services in their country to be better. Regarding the quality of vehicles, 45.0 per cent felt that there was no difference, but 36.0 per cent felt services in their country was better than in Ireland, compared to just 19.0 per cent who believed Ireland to have better services.

**Table 6.7: Tourist ratings of Irish taxi services relative to services in their own country**

	Ireland better (%)	Both same (%)	Own country better (%)	Total (%)
Availability of taxis	17.3	49.0	33.7	100.0
Quality of vehicles	19.0	45.0	36.0	100.0
Ease of getting into/out of vehicles	10.9	59.4	29.7	100.0
Cleanliness of vehicles	15.0	60.0	25.0	100.0
Luggage capacity of vehicles	14.0	59.0	27.0	100.0
Helpfulness of drivers	32.0	54.0	14.0	100.0
Value for money	32.7	36.7	30.6	100.0
Overall level of service	23.8	51.4	24.8	100.0

Source: Based on findings of the Tourist Survey (2005).

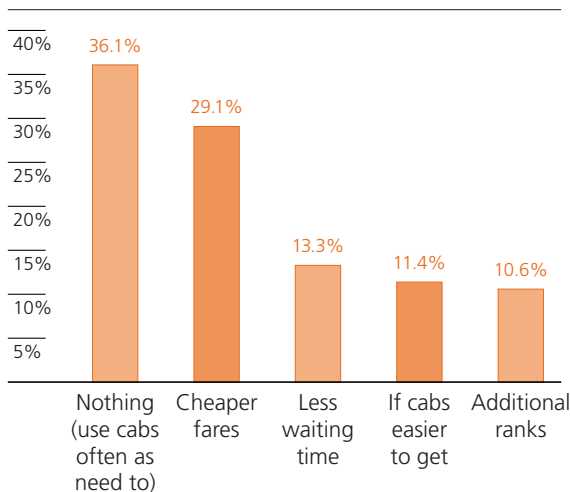
Both personal consumers and business users were also asked what factor if any would encourage them to use cabs more often. The greatest factor for business users was fares. The majority of business users (64.0 per cent) would use cabs more often if fares were cheaper. This was not such a big factor for personal users. Although 29.1 per cent of adults would use cabs more frequently if fares were cheaper, 36.1 per cent do not need to be incentivised to use them more often because they already use them as much as they need to.

### 6.4 Changing trends

As already mentioned in Section 5, similar household surveys of taxi and hackney cab use were undertaken in the Dublin area in 1997<sup>16</sup> and 2001,<sup>17</sup> enabling a comparison of results over time.

The waiting times for cabs that were not pre-booked appear to have reduced. In 1997, 58.5 per cent of adults reported a wait of ten minutes or less. By 2005 this proportion had increased considerably to 74 per cent. Furthermore, in 1997 23.1 per cent of adults had a wait of less than 5 minutes, and by 2005 this proportion had increased by 17.1 percentage points to 40.2 per cent. In 1997, 5.9 per cent of respondents reported a wait of over 30 minutes and this proportion had decreased to 2.2 per cent in 2005.<sup>18</sup>

Figure 6.3: Distribution of adults by factors that would encourage greater cab use



Source: Based on the findings from the Household Survey (2005).  
Note: Totals do not add up as some respondents gave more than one answer.

The perceptions of Dublin consumers in relation to the value for money offered by cabs has also altered somewhat over the last number of years. Where 52.0 per cent of those surveyed in 1997 felt that cabs did offer good value for money, this proportion had decreased to 48.3 per cent in 2005. More notably, where 19.0 per cent of those surveyed in 1997 felt that cabs did not offer good value for money, this proportion had increased to 37.7 per cent in 2005. This may be a reflection of general consumer expectations and price sensitivity that have increased over recent years.

Table 6.8: Distribution of adults by waiting times: 1997, 2001 and 2005

Waiting time	1997 (%)	2001 (%)	2005 (%)
<5 minutes	23.1	47.5	40.2
5–10 minutes	35.4	22.7	33.8
11–20 minutes	29.5	17.4	18.0
21–30 minutes	6.0	6.4	5.8
31–60 minutes	6.0	4.6	1.1
>60 minutes	0.0	1.4	1.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the results of the Household Surveys.

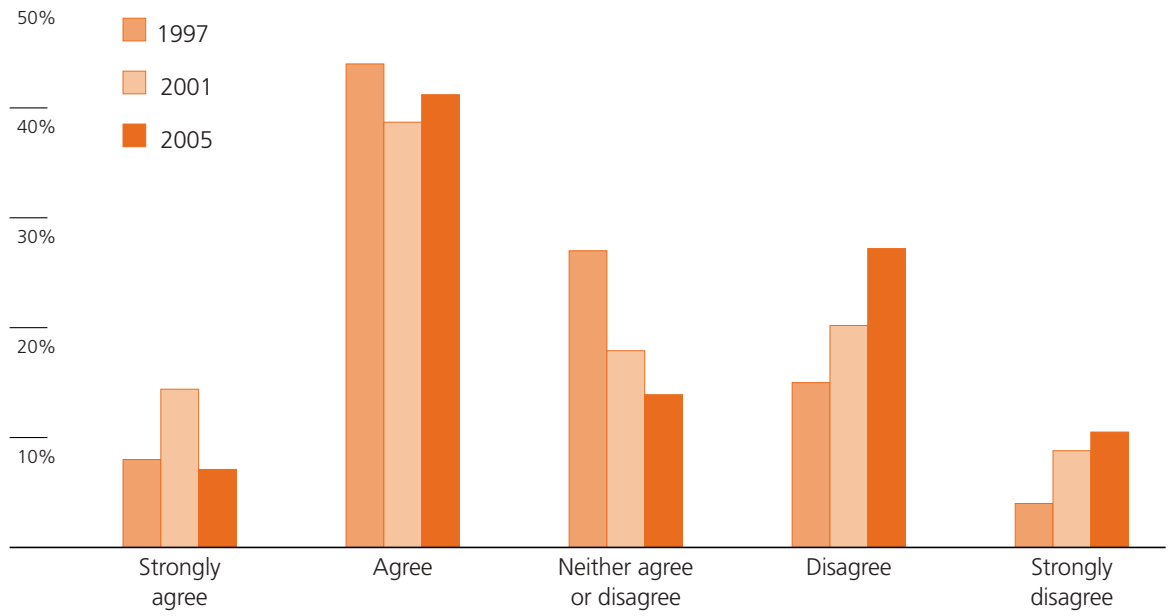
<sup>16</sup> Review of the Taxi and Hackney Carriage Service in the Dublin Area, Oscar Faber and Goodbody Economic Consultants, 1998.

<sup>17</sup> Review of the Taxi and Hackney Market 2001 – Demand and Supply, Goodbody Economic Consultants 2001.

<sup>18</sup> In 1997 and 2001, this question was only asked of people who had telephoned for a cab immediately. In 2005 it was asked of all people who had telephoned for a cab immediately, who had gone to a rank, or hailed a taxi on the street.

**Figure 6.4: Distribution of adults by perception of value for money: 1997, 2001 and 2005****Cabs offer good value for money**

Source: Based on the results of the Household Surveys.

**6.5 Quality of services for people with disabilities**

It should be noted that not all people with disabilities require the services of wheelchair accessible taxis. For people with ambulant disabilities who do not use wheelchairs, a standard saloon cab is usually preferable. In this section of the report the distinction is made where necessary, between people with disabilities generally and people with disabilities who use wheelchairs.

Wheelchair accessible taxis provide a very important mode of public transport for people with disabilities who use wheelchairs, and for some they are the only option. However, it is often perceived that taxi services that are provided for people using wheelchairs are not as good as services provided to other members of the community. The data collected in the Survey of People with Disabilities indicate that 40.8 per cent of people who use wheelchairs have a lack of wheelchair accessible services in their area.

For those who do have a local service, only 39.1 per cent feel that cab companies are willing to provide a wheelchair accessible service, compared to 30.4 per cent who feel that they are unwilling.

Over half (55.1 per cent) of people who use wheelchairs have had experience of a cab company refusing to provide them with a service. The primary reason given by cab companies in such situations was that they had no accessible vehicle available.

**Table 6.9: Distribution of people who use wheelchairs by reason given for refusal of service**

Reason given for refusal	Respondents (%)
No wheelchair accessible taxi available	59.3
No wheelchair accessible taxi in fleet	25.9
No cabs of any kind available	7.4
Other	7.4
<b>Total</b>	<b>100.0</b>

Source: Based on findings of the Survey of People with Disabilities (2005).

Table 6.10: Perceptions of people with disabilities of cab services

	Strongly agree (%)	Agree (%)	Neither agree nor disagree (%)	Disagree (%)	Strongly disagree (%)
Cabs generally provide a good service	22.6	36.8	17.9	12.3	10.4
Drivers are generally helpful and friendly	30.1	52.2	11.5	3.5	2.7
Cab vehicles are of good quality	20.5	47.3	18.8	8.9	4.5
Taxi fare meters are easy to read	19.6	38.2	14.7	15.7	11.8
Taxi fare cards are easy to read	15.8	33.7	21.1	18.9	10.5
Cab fares are affordable	8.4	23.4	15.8	31.8	20.6

Source: Based on findings of the Survey of People with Disabilities (2005).

Wheelchair accessible taxis are required to have anchorages for wheelchairs and appropriate belts for passengers. Only 29.2 per cent of people who use wheelchairs find that the safety equipment is always present in wheelchair accessible taxis.

When safety equipment is present, the proportion of those that find it always in working order is just 34.2 per cent. Only a quarter of people who use wheelchairs feel that drivers of wheelchair accessible taxis always know how to use the safety equipment.

The general perceptions of people with disabilities in relation to cab services provided are mixed. As Table 6.10 indicates, 59.4 per cent feel that cabs do generally provide a good service, compared to 22.7 per cent who disagree. A further 82.3 per cent find cab drivers to be helpful and friendly, compared to just 6.2 per cent who disagree. Over 27 per cent find taximeters difficult to read and almost 30 per cent find fare cards difficult to read. A significant 52.4 per cent do not find cab fares to be affordable, compared to 31.8 per cent who agree that they are.

Figure 6.5: Distribution of people who use wheelchairs by perceptions of safety equipment in WATs

Source: Based on the findings of the Survey of People with Disabilities (2005).

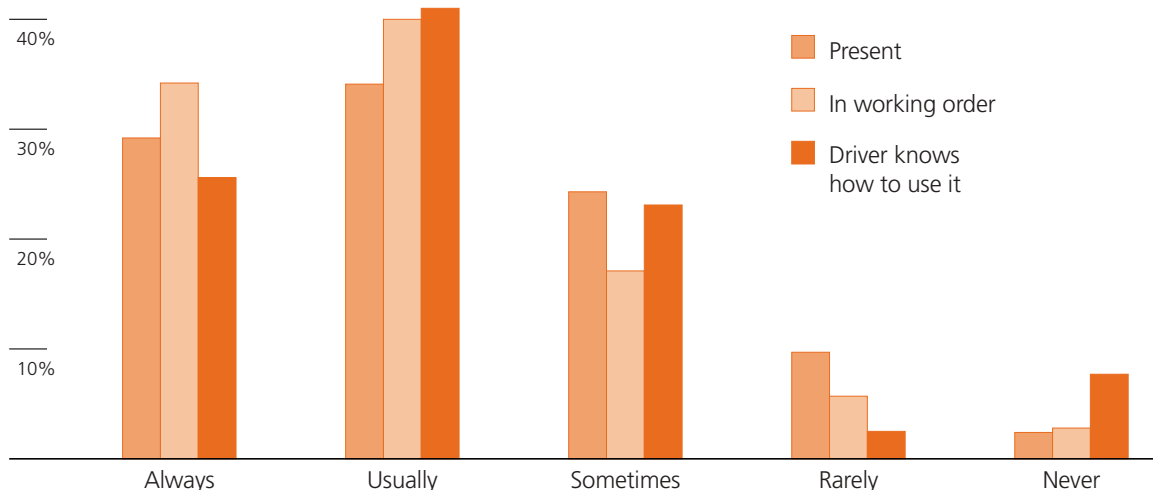


Table 6.11: Perceptions of people with disabilities who use wheelchairs

	Strongly agree (%)	Agree (%)	Neither agree nor disagree (%)	Disagree (%)	Strongly disagree (%)
WATs are suitable to my needs	20.5	40.9	13.6	13.6	11.4
There is sufficient capacity for myself and other passengers in WATs	20.9	48.8	7.0	7.0	16.3
Seating arrangements in WATs are satisfactory	18.7	41.9	13.9	13.9	11.6
Physical layout of WATs is satisfactory	11.9	40.5	11.9	23.8	11.9

Source: Based on findings of the Survey of People with Disabilities (2005).

Just over 60 per cent of people who use wheelchairs agree that wheelchair accessible vehicles are suitable for their needs and a further 52.4 per cent are satisfied with the physical layout of vehicles in terms of door width and ceiling height.

Although the survey of people with visual impairments was small, the responses received in relation to the suitability of services to their needs are valuable. When asked about the inhibiting factors that can deter them from using cabs, 63.6 per cent of people with visual impairments referred to fare levels and a further 39.4 per cent referred to the attitudes of drivers and cab dispatch companies. When asked if there are any changes that could be made to vehicles that would make using a cab easier for people who are blind or visually impaired, 61.9 per cent said that if cabs were colour coded, they would be more identifiable. A further 33.3 per cent said that clearly marked door handles, seat edges and grab handles, would make cabs easier for them to use.

## 6.6 Complaints and complaint mechanisms

Currently, the only official means of making a formal complaint in relation to cab services is through the PSV Inspectorate of the Garda Síochána. In Dublin, the PSV Inspectorate resides in the Carriage Office, which carries out the role of enforcing of the public service vehicle regulations. Elsewhere, this function

is normally carried out by individual officers. There are up to thirty PSV Inspectors in An Garda Síochána.

It would be normal to expect, as with any service, that taxi and hackney dispatch companies would have in place procedures to deal with consumer complaints. However, the fact that approximately half of cab drivers are not affiliated and dispatch companies are small in size limits the possibilities of reliance on companies for complaint resolution.

Very few people make formal complaints about bad cab experiences. Only 6.8 per cent of adults surveyed in the Household Survey had ever made a formal complaint. This proportion varied depending on age and geographical location. Almost 8 per cent of 15–34 year olds had made a complaint at some stage, as had 12.0 per cent of respondents in Dublin.

Of those who had complained, roughly three-quarters felt that their complaint had been resolved to their satisfaction, but 23.8 per cent said that it had not.

Those people who had never made a complaint were asked if they knew where to go to make a complaint. Tourists visiting Ireland were asked the same question. In both consumer groups, roughly 40 per cent said that they would complain to the taxi or hackney company. Where only 14.6 per cent of Irish consumers said that they would go to the Gardaí, an impressive 40.2 per cent of tourists gave this as an answer (this could be influenced by the fact that the tourist survey was confined to Dublin).

**Table 6.12: Distribution of adults who had ever made a formal complaint**

Respondent group	Yes (%)	No (%)	Total (%)
All respondents	6.8	93.2	100.0
15–34 years	7.9	92.1	100.0
35+ years	5.7	94.3	100.0
Dublin	12.0	88.0	100.0
Rest of Leinster	4.7	95.3	100.0
Munster	4.7	95.3	100.0
Connaught/Ulster	1.6	98.4	100.0

Source: Based on the findings of the Household Survey (2005).

When the responses are analysed by geographical area, a number of disparities arise. In Dublin almost half (45.4 per cent) of respondents said that they did not know where they should go with a complaint, but interestingly 29.4 per cent did know to go to the Gardaí. In Munster, 24.6 per cent said that they would not know where to go and only 6.1 per cent said the Gardaí. A large majority (67.3 per cent) said that they would take any complaints to the taxi or hackney company. The survey findings imply that there is uncertainty among consumers, particularly outside of Dublin, over the compliance role that the Gardaí play.

**Table 6.13: Distribution of adults by knowledge of where to report complaints**

	All adults (%)	Tourists (%)
Taxi/Hackney office	40.7	38.2
The Gardaí	14.6	40.2
Local Authority	5.6	3.9
Other	2.2	2.0
Tourist Office	—	2.0
Don't know	36.9	13.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the findings of the Household Survey and the Tourist Survey.

**Table 6.14: Distribution of adults by knowledge of where to report complaints and geographical area**

	Dublin (%)	Rest of Leinster (%)	Munster (%)	Connaught/Ulster (%)
Taxi/Hackney office	19.7	33.3	67.3	48.8
The Gardaí	29.4	11.3	6.1	3.2
Local Authority	1.7	15.2	1.2	6.5
Taxi Representative Body	2.1	2.5	0.8	0.8
The Ombudsman	1.4	0.0	0.0	0.0
Office Of Consumer Affairs	0.3	0.0	0.0	0.0
Don't know	45.4	37.7	24.6	40.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Based on the findings of the Household Survey (2005).

## 6.7 Summary

The general perception of consumers is that the overall quality of cab services provided is good. Waiting times are reasonable and data for Dublin indicate a vast improvement over recent years.

There is room for improvement in certain areas, however, particularly where fares are concerned. Just over a quarter of consumers feel that cabs do not offer good value for money and 29.1 per cent would be inclined to use cabs more often if fares were cheaper. There is also a need for more clarity as to how fares are calculated.

People with disabilities receive a different level of service to other cab users. Just over 40 per cent of people in wheelchairs stated that they have no wheelchair accessible service in their area. The majority have also had some experience of cab companies refusing to provide a service. The explanation most often given is that the companies do not have any accessible vehicles available. Occasions do occur in which wheelchair accessible taxis do not have the necessary safety equipment onboard. When they do there can be times where it is not in working order or where the driver will not know how to use it. Overall, 59.4 per cent of people in wheelchairs feel that cab services are generally good and 82.3 per cent find drivers helpful and friendly. There is room for improvement in a number of areas with affordability of fares and availability of wheelchair accessible taxis being a particular issue for people with disabilities.

Where complaints and complaint mechanisms are concerned, only 6.8 per cent of consumers surveyed have ever made a formal complaint in relation to a cab journey. Many consumers are unaware of how or where to complain if they do have a problem. Of those surveyed that have never complained, only 14.6 per cent knew where to take such complaints.

# 7

## Fare levels and structures

### 7.1 Introduction

Maximum fares are applied to taxis in Ireland. This section of the report reviews maximum fare levels and structures in the taximeter areas throughout the country. It then proceeds to make comparisons with fare levels internationally.

### 7.2 Background

Maximum fares are established by the relevant local authority for each taximeter area and published in the form of a fare card. The fare card sets out how the fare is calculated, and must be displayed in the taxi. The fare structure is programmed into the taximeter and the meter indicates the fare relevant to any given journey. Taxi drivers are, of course, free to charge less than the metered amount.

The fares that apply to taxi travel in Ireland vary from one taximeter area to another. This is because the elected members of Local Authorities set fares and they take into account not only the taxi operating characteristics within their area, but also the views of stakeholders. The rates are reviewed by the Local Authority from time to time, typically upon submission of a request from local taxi representatives.

### 7.3 Composition of the typical fare card

Table 7.1 overleaf lists the elements that can be found in Irish fare cards. Some elements of the fare card will be incurred on all journeys (e.g. the Minimum Fare), others (e.g. a luggage charge) will only be incurred under certain conditions.

The primary elements of taxi fares are those that are dependent on distance and time. At any one point in a journey, these elements are being charged according to either distance or time – but not both. At low speeds, or when the vehicle is stationary, a fare is calculated by time. This rewards the driver for waiting for passengers who have reserved his or her services but are not yet ready to travel, or for the costs of operating in periods of traffic congestion. Once the vehicle exceeds a certain speed (known as the changeover speed) the fare is calculated according to the distance travelled. If the speed falls below the changeover speed, then the next incremental charge will be incurred according to time. In Ireland, the changeover speed averages 16.9 km/hr (10.5 mph), but can be as high as 29km/hr (18 mph).

### 7.4 A review of published fares

In order to accurately determine the structure and rates of fares in Ireland, a review was undertaken of twenty-seven Irish taximeter areas as part of this study. In all cases, the fare cards contain the two fundamental elements of a metered system: the minimum fare and the charge for mileage thereafter.

Table 7.1: Typical fare card structure

Item	Components	Example
<b>Daytime Minimum Fare</b> This structure is designed to incorporate a hiring charge, as well as an allowance to travel up to a specified distance, or elapse of time, at no additional charge. If the initial allowance for distance is exceeded, further charges are applied to the excess distance travelled; this further charge is known as 'mileage thereafter'.	Cost Distance Allowance Time Allowance	€4.50 2 km 300 seconds
<b>Daytime Mileage Thereafter</b> A time- and distance-related charge that applies to trips that exceed the basic allowance for time and distance incorporated in the Minimum Fare	Rate for distance and time	Expressed on a fare card in the increments through which the taximeter rises and the cost is incurred e.g. 20c/30secs and 20c/0.2km
<b>Unsocial Hours: Minimum Fare</b> A premium is usually applied on top of the daytime charges during unsocial hours, i.e. at night and during holidays. The allowance included for distance and time is sometimes reduced.	Cost Distance Allowance Time Allowance	€5.00 1.5 km 250 seconds
<b>Waiting Time</b> A fare typically based on the variation of mileage thereafter with time that compensates the driver for time spent waiting for passengers	Rate for time	40c/minute
<b>Unsocial Hours: Mileage Thereafter</b> A premium can be applied to the mileage thereafter during unsocial hours. In Ireland, this is found only in the cities, and is typically only applied when the premium applied to the minimum fare during unsocial hours is modest.	Rate for distance and time	25c/0.25km 25c/30 secs
<b>Extras</b> These include a range of additional charges for items such as additional passengers, luggage or telephone bookings. They are typically a flat rate, and not time- and distance-related. Furthermore, most taximeter areas only charge for some of these items.	Extra passengers Stops Booking Luggage Premium rank Soiling charge Animals	50c per extra adult passenger €1 per stop €1.50 for radio/ phone booking 50c/item €1.50 at Dublin Airport €75.00 50c/animal: guide dogs free

#### 7.4.1 The minimum daytime fare

The fare cards contain a minimum fare that includes an initial allowance to travel a certain distance – but this distance varies between taximeter areas from 0.8km to 4.8km, and is 2.2 km on average. The value of the minimum fare also varies from €2.40 to €6.00, with higher fares typically including an allowance to travel higher distances without incurring extra charges. Some towns with a high minimum fare also allow a second passenger to travel at no extra cost.

High minimum fares applying over short distances are a deterrent to use of taxis over those distances. It is clear that in some towns, the minimum fares are set too high, and would discourage taxi use for distances for which walking is not a viable alternative.

#### 7.4.2 The daytime mileage-thereafter fare

All fare cards contain a rate that is applied once the distance allowance within the minimum fare is exceeded. There is considerable variation in the rate applied, with values lying between €0.73/km and €1.25/km. The critical issues with regard to the mileage-thereafter rate is not only the absolute value, but the proportion of a typical trip that will be metered according to this rate, as opposed to the initial distance allowance of the minimum fare. For this reason, a direct comparison of the mileage-thereafter rates does not accurately indicate the relative level of charges between taximeter areas.

The minimum fare and the mileage-thereafter are incurred according to the passing of time and distance – except in three taximeter areas. In Dungarvan, County Carlow and Drogheda the charge is solely distance dependent, and time-related charges are not applied.

With the exception of the minimum fare, the mileage-thereafter during daytime, and the soiling charge, no other elements that could appear in a fare card are present in every Irish taximeter area. However, the following elements are present in many areas.

#### 7.4.3 The minimum unsocial hours fare

Almost all fare cards apply a premium to the minimum fare during unsocial hours. The premium applied averages 16 per cent, but some towns have higher rates, and four areas (County Carlow, Ennis, Killarney and Tralee) apply no premium during unsocial hours.

#### 7.4.4 The unsocial hours mileage-thereafter rate

A premium can be applied to the mileage thereafter rate during unsocial hours. This mechanism only operates in Irish cities, and not in other areas. In Dublin, this is the primary mechanism for applying a premium during unsocial hours, with the rate for mileage thereafter increasing by 33 per cent between daytime and night-time. In this instance, the same distance rate is applied to the distance allowance within the minimum fare.

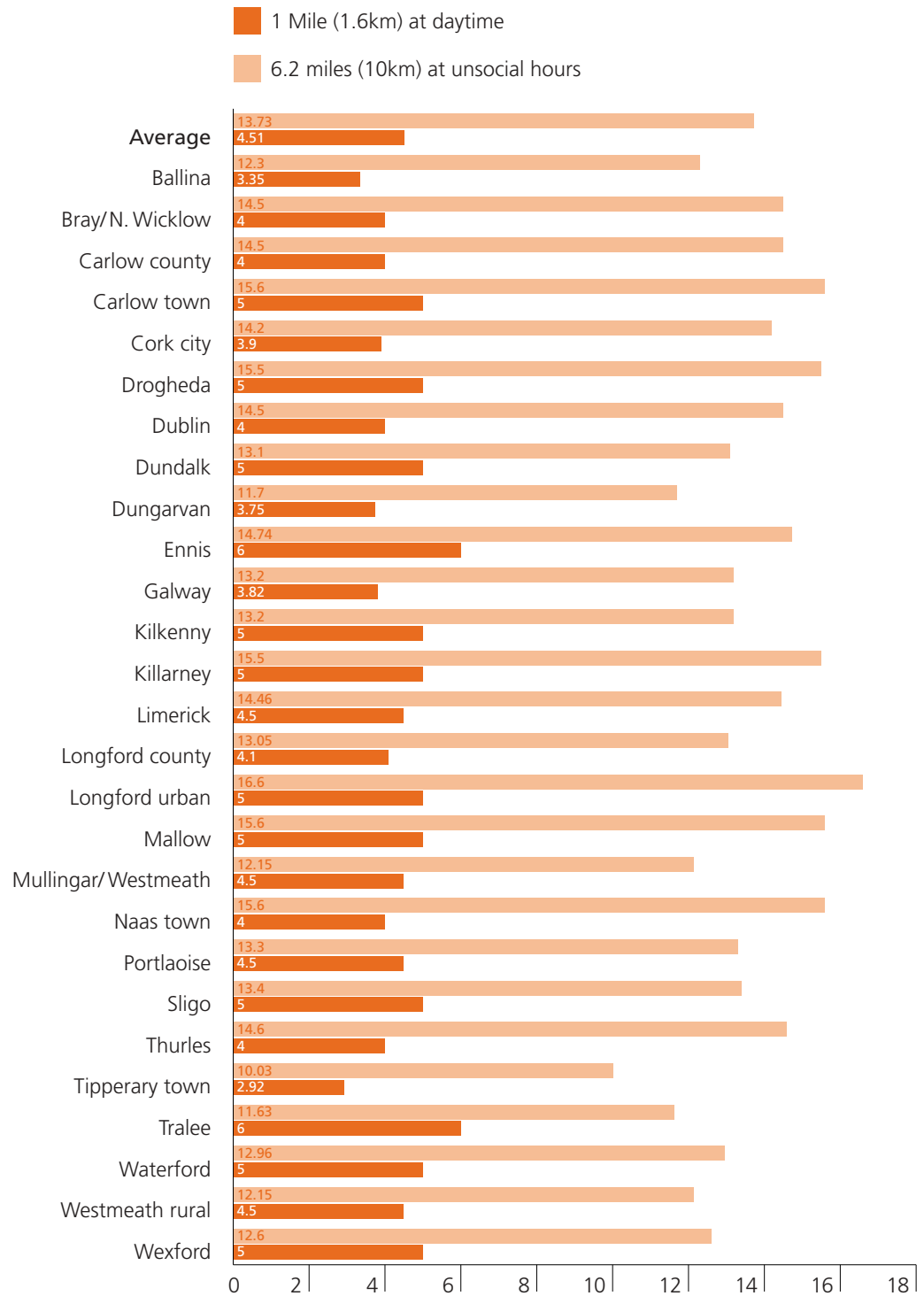
The definition of what constitutes unsocial hours is inconsistent. The time of evening that hours become unsocial begins as early as 8 p.m. in Cork, Galway, County Longford, Waterford, Kilkenny, Ballina and Tipperary; and as late as 12 p.m. in Thurles. The evening rate typically runs through the night and ends early the following morning. In Tipperary, County Longford and Ballina, the definition of unsocial hours does not fit the typical structure: a first phase of unsocial hours begins at 8 p.m. and attracts a premium of €0.50, but between midnight and 5 a.m. the premium rises to €1. The fare then drops to the lower rate for unsocial hours between 5 a.m. and 8 a.m.

Some local authorities define unsocial hours as including all day on Sunday; others define only Sunday evening and night as unsocial, in keeping with the definition for night rates for the rest of the week. The definition of unsocial hours during Public Holidays tends to define them as relating to the whole day. However, Carlow does not define these days as unsocial, and Mallow, Thurles and Portlaoise define unsocial hours only in the evenings and nights. In some cases, the premium relating to public holidays exceeds the normal premium applied to unsocial hours on other days.

In addition to time and distance related charges, there are a number of other, typically fixed, price elements that are applied to fares.

Figure 7.1: A comparison of fares by taximeter area

Fare (€) for a lone travelling passenger with no extras.



Source: Compiled by Goodbody Economic Consultants.

Note: The fares illustrated above are calculated using time-based charges and do not allow for congestion.

#### 7.4.5 The charge for extra passengers

Some taximeter areas, usually those with a high minimum fare, do not charge for extra passengers; but most do. In almost all cases, the charge is 50c per extra adult passenger, with two children counting as one adult.

#### 7.4.6 Extra stops

Some taximeter areas charge for extra stops, either to deliver and pick up goods or passengers before travelling onwards. Most areas that include this charge do not employ a charge for extra passengers.

#### 7.4.7 Telephone booking

The four largest cities in the State (Dublin, Cork, Galway and Limerick), along with Dundalk, Ballina and Tipperary, carry a charge of €1.50 for making bookings by telephone. In County Longford the charge is 50c and in Killarney it is €1.20. The charge does not apply elsewhere.

#### 7.4.8 Luggage

The four largest cities in the State, along with Killarney, Thurles, Ballina and Tipperary, have a charge for items of luggage that exceed a certain size. The typical charge is 50c per item.

#### 7.4.9 Animals

Dublin, Bray, Galway, Limerick, Cork, Ballina, Tipperary and County Longford charge 50c for each animal carried (guide dogs are free). Longford Town charges €1 per animal, Killarney 60c and the charge is €3 in Thurles. In all other areas, no charge applies.

#### 7.4.10 Soiling charge

This charge is found in all areas, and is designed primarily to discourage staining of the cab, due to accidents with food, drink and related issues, that would force the cab out of service until the vehicle had been cleaned and valeted. The charge for this 'extra' ranges from €25 to €100.

#### 7.4.11 Premium pick-up points

In Dublin, there is an extra charge of €1.50 for being picked up at Dublin Airport. In Dungarvan, any pick-up that is not at a rank carries a charge of €0.75. This charge is not found elsewhere.

### 7.5 A comparison of fares across taximeter areas

The review of fare structures, and the typical rates that apply to their constituent element has shown that there is diversity between Ireland's taximeter areas. However, the principal issue is not the fare structure itself, but the fares that the consumer faces. In order to illustrate this, a calculation was made of the actual fare that would be charged for taxi trips over four distances during both daytime and unsocial hours. This allows meaningful comparisons to be made between taximeter areas.

Figure 7.1 overleaf shows the results of the comparison of fares for what one might expect to be the cheap and expensive trips: a 1.6km (1 mile) daytime trip and a long 10km (6.2 mile) trip during unsocial hours. Many short trips incur a charge that is a rounded number (e.g. €5.00); this is because the fare charged equates to the minimum fare, where the distance allowance has not been exceeded. The cheapest areas over this distance are those with a relatively low minimum fare level and a correspondingly low distance allowance. Areas that are relatively low cost over short distances, can end up being amongst the most expensive over longer journeys e.g. Naas. However, some areas, like Tipperary, represent consistently good value for all journey lengths at all times.

Table 7.2 below ranks each taximeter area according to the fare charged to a lone passenger over short distances (1 and 2 miles) and longer distances (5km and 10km) at different times. Areas shaded dark orange are within 10 per cent of the average fare for the country. Areas shaded light orange are within 10 per cent to 15 per cent of the average fare. Clearly, there is already a convergence in fare levels between most areas. This raises the possibility of applying a standard approach to fare setting across a range of taximeter areas.

Table 7.2: Ranking of typical fares by taximeter area

Ranking by cost (lowest first)	Short trips by day	Long trips by day	Average trip by day	Short trips unsocial hours	Long trips unsocial hours	Average trips unsocial hours	All trips
1	Tipperary town	Tipperary town	Tipperary town	Tipperary town	Tipperary town	Tipperary town	Tipperary town
2	Ballina	Wexford	Dungarvan	Dungarvan	Dungarvan	Dungarvan	Dungarvan
3	Dungarvan	Dungarvan	Ballina	Carlow county	Wexford	Mullingar/Westmeath	Ballina
4	Mullingar/Westmeath	Waterford	Wexford	Ballina	Mullingar/Westmeath	Westmeath rural	Mullingar/Westmeath
5	Westmeath rural	Ballina	Mullingar/Westmeath	Mullingar/Westmeath	Westmeath rural	Ballina	Westmeath rural
6	Thurles	Mullingar/Westmeath	Westmeath rural	Westmeath rural	Tralee	Wexford	Wexford
7	Portlaoise	Westmeath rural	Galway	Dublin	Ballina	Dundalk	Galway
8	Galway	Galway	Waterford	Bray/N. Wicklow	Dundalk	Tralee	Portlaoise
9	Cork city	Dublin	Portlaoise	Dundalk	Waterford	Portlaoise	Waterford
10	Dublin	Bray/N. Wicklow	Dublin	Thurles	Portlaoise	Galway	Dundalk
11	Bray/N. Wicklow	Portlaoise	Bray/N. Wicklow	Galway	Sligo	Carlow county	Dublin
12	Longford county	Limerick	Cork city	Cork city	Galway	Sligo	Bray/N. Wicklow
13	Naas town	Kilkenny	Longford county	Portlaoise	Kilkenny	Longford county	Longford county
14	Waterford	Tralee	Limerick	<b>Average</b>	Longford county	<b>Average</b>	Sligo
15	Dundalk	Longford county	Kilkenny	Sligo	<b>Average</b>	Waterford	Cork city
16	Sligo	Cork city	Dundalk	Longford county	Carlow county	Dublin	Tralee
17	Carlow county	Dundalk	Sligo	Limerick	Cork City	Bray/N. Wicklow	Kilkenny
18	Wexford	Sligo	<b>Average</b>	Wexford	Dublin	Thurles	<b>Average</b>
	<b>Average</b>	<b>Average</b>	Thurles	Naas town	Bray/N. Wicklow	Kilkenny	Thurles
19	Kilkenny	Thurles	Tralee	Tralee	Thurles	Cork city	Limerick
20	Limerick	Carlow county	Carlow county	Killarney	Limerick	Limerick	Carlow county
21	Carlow town	Naas town	Naas town	Drogheda	Ennis	Ennis	Naas town
22	Mallow	Carlow town	Carlow town	Kilkenny	Killarney	Killarney	Carlow town
23	Drogheda	Mallow	Mallow	Ennis	Drogheda	Naas town	Drogheda
24	Longford urban	Ennis	Drogheda	Waterford	Naas town	Drogheda	Mallow
25	Tralee	Drogheda	Ennis	Carlow town	Carlow town	Carlow town	Ennis
26	Killarney	Killarney	Killarney	Mallow	Mallow	Mallow	Killarney
27	Ennis	Longford urban	Longford urban	Longford urban	Longford urban	Longford urban	Longford urban

Source: Compiled by Goodbody Economic Consultants.

Areas where the fare is within less than 10% of the average.

Areas where the fare is within 10% to 15% of the average.

## 7.6 Standardising fare structures

### 7.6.1 Introduction

Analysis has shown that, despite the variation in the weighting and rates given to different components of the fare card, the actual fares charged converge to within 10 per cent of the average in most areas. Nevertheless, there are some fare structures that result in fares well above or below the average. Furthermore, there are other fares that give inappropriate weighting to certain components of the fare card, and thus penalise passengers on certain types of trips.

The elements of the fare structure that give rise to such problems are as follows.

### 7.6.2 The minimum fare

The greatest scope for improving Irish fare structures is with regard to the minimum fare, which is applied inconsistently throughout the country in many very similar environments. The components of the minimum fare can be regarded as consisting of two distinct elements: the hiring charge and an initial allowance for distance which is charged at a fixed, flat price. The minimum fare does not quote the price of these two components separately, but the value of both can be inferred. The fixed charge for the distance included in the minimum fare is calculated by applying the rate for mileage thereafter to the initial distance allowance. The balance between this figure and the total minimum fare constitutes the hiring charge. In Ireland, mileage is charged between €0.73 and €1.25; the hiring charge varies from €0.90 to €3.75. Furthermore, the length of the distance allowance, as well as the rate at which it is charged, varies significantly. Further variety is introduced in some areas by including an allowance for a second person to travel free within the minimum fare.

These factors combine to produce regimes that can exhibit one or more of the following failings:

- A hiring charge too low to provide a reward for an operator on a short trip;
- A hiring charge that is so high as to unjustly penalise those taking only a short trip;
- A distance allowance that forces those undertaking short trips to pay for mileage that they do not travel; and,

- No allowance for those instances in which more than one person is being transported.

These elements often combine to result in a flat fare regime. In towns that have a high distance allowance within the minimum fare, most journeys within the boundary of the town incur the minimum fare. This is because the distance allowance is not exceeded. Thus, most trips in that market are effectively subject to the same flat fee, independent of distance.

In order to correct these imbalances a number of principles should be adhered to:

- The hiring charge should be sufficient to ensure a sufficient return to the service provider on short trips;
- The combination of the minimum fare and allowable distance should not result in such a high charge per distance for very short trips as to excessively deter demand; and,
- The minimum fare should relate to travel by one passenger, with additional travelling adults paying an extra passenger charge.

### 7.6.3 The mileage-thereafter

The rates applied to mileage-thereafter are sometimes very low – especially if a high minimum charge has been introduced. If minimum fares were correctly priced and calibrated, then the rate for mileage thereafter would need to be increased in these instances. In some other areas the rate is too high.

### 7.6.4 Unsocial hours

The premium applied to unsocial hours should have the effect of ensuring an adequate supply of taxis during these hours. Furthermore, the premium should take into account the fact that a taxi travelling a long journey incurs higher driver costs than a taxi travelling a short distance. Therefore, the premium should always be applied to the mileage thereafter rate, as well as to the mileage allowance within the minimum fare. It may be appropriate to also apply a premium to the hiring charge.

The mileage-thereafter rate adjusted for unsocial hours is applied only in the major conurbations. In taximeter areas in towns, a flat premium is applied during unsocial hours, regardless of the distance travelled.

### 7.6.5 Extras

In Ireland, there is general consistency in the rates that are charged for most extras. The major inconsistency lies in the fact that in some taximeter areas, there are no charges imposed for certain extras. In general, where a passenger is receiving the benefits of these additional aspects of the basic service, it is appropriate that an operator should have the ability to charge for them. In particular, the following common extras should be chargeable:

- Carriage of extra adult passengers;
- Carriage of animals;
- Carriage of items of luggage over a certain size;
- A telephone booking fee; and,
- A soiling charge

A small number of areas impose a charge for extra stops. If waiting time and charges for extra passengers exist, this charge could be regarded as superfluous.

## 7.7 International comparisons

### 7.7.1 Introduction

The setting of fare levels should be based on the needs of the Irish market, rather than a comparison with other jurisdictions with very different cab markets. However, it is also true that a report of this nature, that is seeking to establish baseline data, would be expected to provide comparative information on fare levels.

In order to place Irish fares in an international context, a survey was undertaken of the fares applicable in a number of major European cities, as well as other smaller towns and cities. The structure of fares in many parts of continental Europe is different to that in Ireland. Most significantly, many European cities include no allowance for a preliminary distance within the minimum fare. In these cities the minimum fare is frequently equivalent to a simple hiring charge. In addition, in cities such as Paris, the rates change not only according to distance or time, but also to whether one is travelling in the city-centre, the suburbs or beyond.

**Table 7.3: Average daytime fares in major European cities (€)**

Distance	1 mile (1.6km)	2 miles (3.2 km)	5 km	10 km	Average
Athens	1.60	1.67	2.15	3.55	2.24
Lisbon	2.44	3.00	3.63	5.38	3.61
Seville	2.81	3.33	4.52	8.02	4.67
Madrid	2.89	4.16	5.50	9.45	5.50
Paris	5.00	5.00	6.20	10.40	6.65
<b>Dublin</b>	<b>4.00</b>	<b>5.50</b>	<b>7.00</b>	<b>11.50</b>	<b>7.00</b>
Vienna	4.10	5.90	7.70	12.10	7.45
Rome	4.09	5.75	7.51	12.68	7.51
Leipzig	3.84	5.76	7.80	13.80	7.80
Brussels	4.29	6.11	8.05	13.75	8.05
Manchester	4.09	6.14	8.18	14.02	8.11
Liverpool	4.38	6.43	8.47	13.44	8.18
Edinburgh	4.13	6.15	8.84	15.56	8.67
Sheffield	4.67	6.72	8.76	14.90	8.76
Munich	4.97	7.29	9.75	16.25	9.56
London	5.55	8.47	11.39	20.45	11.47

Source: Compiled by Goodbody Economic Consultants.

Where such tariffs apply in a taximeter area, it has been assumed for comparative purposes that the journey undertaken was divided equally between the two zones.

### 7.7.2 A Comparison of fares for major cities

Table 7.3 above shows a variety of daytime fares for a lone passenger in Dublin, and in comparable European cities. Athens and Lisbon are low cost cities in general, and this is reflected in their taxi fares, which are amongst the lowest in Western Europe. Madrid and Seville are affluent cities, but Spain is generally a lower cost economy, and the cost of daytime travel is still significantly cheaper than Dublin. However, taxi fares in Ireland's capital are cheaper than most capital cities surveyed such as Vienna, Rome, Brussels and London, but Paris is cheaper. Taxi fares in London are at the top of the European table.

Table 7.4 below presents a comparison of Dublin with average fares in Europe during unsocial hours. Ireland retains its ranking relative to most other cities.

### 7.7.3 A comparison of fares for other cities and towns

Table 7.5 overleaf compares Irish taximeter areas in general, and Cork in particular with a number of British cities and towns of comparable size. In general, taxis in the UK are expensive by European standards, but prices vary widely. Hartlepool is the cheapest taximeter area in Britain, and Kings Lynn is a taximeter area that covers a small town and rural district. Both of these are cheaper areas for travel than Ireland. On the other hand, areas like Warrington are about the same, and Cambridge is significantly more expensive.

Fare prices in other Irish cities and towns compare even more favourably to prices in Britain during unsocial hours, as shown in Table 7.6 overleaf. This suggests that the premium applied in many Irish taximeter areas is modest by comparison to those applied abroad.

Table 7.4: Average fares in major cities during unsocial hours (€)

Distance	1 mile (1.6km)	2 miles (3.2 km)	5 km	10 km	Average
Athens	2.18	3.03	3.93	6.58	3.93
Lisbon	2.92	3.62	4.41	6.61	4.39
Leipzig	3.05	3.75	4.50	6.70	4.50
Seville	3.57	3.57	4.76	8.26	5.04
Madrid	3.13	4.62	6.20	10.85	6.20
Paris	5.00	5.50	7.30	12.60	7.60
<b>Dublin</b>	<b>4.50</b>	<b>6.50</b>	<b>8.50</b>	<b>14.50</b>	<b>8.50</b>
Vienna	4.60	6.80	9.00	14.00	8.60
Rome	6.67	3.42	10.09	15.26	8.86
Sheffield	5.40	7.45	9.49	15.63	9.49
Munich	4.97	7.29	9.75	16.25	9.56
Edinburgh	5.32	7.36	10.05	16.77	9.87
Brussels	6.15	7.97	9.91	15.61	9.91
Manchester	4.97	7.60	10.23	17.53	10.08
Liverpool	5.55	8.11	10.66	16.87	10.30
London	7.01	11.39	16.07	29.22	15.92

Source: Compiled by Goodbody Economic Consultants.

Table 7.5: Average daytime fares in selected Irish and British cities and towns (€)

Distance	1 mile (1.6km)	2 miles (3.2 km)	5 km	10 km	Average
Hartlepool	3.07	3.94	4.82	7.60	4.86
Kings Lynn	3.51	5.27	7.36	12.83	7.24
<b>Cork</b>	<b>3.90</b>	<b>5.50</b>	<b>7.30</b>	<b>12.30</b>	<b>7.25</b>
Warrington	3.36	5.26	7.45	13.51	7.40
<b>Average Irish town or city</b>	<b>4.51</b>	<b>5.50</b>	<b>7.35</b>	<b>12.63</b>	<b>7.50</b>
Cambridge	4.97	7.01	9.64	16.65	9.57

Source: Compiled by Goodbody Economic Consultants.

Table 7.6: Average fares in smaller Irish and British cities and towns during unsocial hours (€)

Distance	1 mile (1.6km)	2 miles (3.2 km)	5 km	10 km	Average
Hartlepool	4.09	5.84	7.89	13.59	7.85
<b>Average Irish town or city</b>	<b>5.25</b>	<b>6.31</b>	<b>8.22</b>	<b>13.73</b>	<b>8.38</b>
<b>Cork</b>	<b>4.80</b>	<b>6.60</b>	<b>8.60</b>	<b>14.20</b>	<b>8.55</b>
Kings Lynn	5.26	7.91	11.04	19.24	10.86
Cambridge	6.43	8.47	11.10	18.11	11.03
Warrington	4.75	7.60	10.88	21.18	11.10

Source: Compiled by Goodbody Economic Consultants.

## 7.8 Conclusions

Fare structures vary considerably across taximeter areas. In many areas, significant elements of the fare structure are omitted. In other areas too much reliance is placed on particular elements. A particular problem in this regard is the high minimum fare set in some towns. This acts as a deterrent to short-distance taxi use.

Despite the differences in fare structures, the actual fares charged for different types of trips do not show equivalent variation. This suggests that there is scope for standardising fare structures and levels across taximeter areas. This would result in significant changes to minimum fares, a rationalisation of the approach to unsocial hours charges, and consistency in the application of 'extras'.

An international comparison of taxi fares shows that fares in Dublin are below those in many European cities, but above those in low-cost countries such as Spain, Portugal and Greece. A similar comparison reveals that fares in Irish towns tend to be lower than those in equivalent towns in Britain.



## Industry structure and economics

### 8.1 Introduction

There is no national database of information relating to the number of SPSV driver's licences issued. However, it is estimated that currently, there are approximately 50,000 such licences. Prior to liberalisation of the taxi industry at the end of 2000, a significant proportion of taxi drivers were operating as drivers for owners of taxi licences. The organisation of the industry changed with liberalisation and now the vast majority of taxi drivers have their own taxi licences and vehicles.

The data used in this section of the report were gathered largely by way of a survey of Dublin-based taxi and hackney drivers. The survey set out to establish their operating behaviour and their perceptions on a number of issues, as well as their estimated average earnings. Conducted during March 2005, the survey took the form of a questionnaire administered, with the co-operation of Dublin City Council, as drivers attended the Council's offices to renew their licences.<sup>19</sup>

As most taxi and hackney drivers are owner-drivers, they have the option of affiliating to a radio dispatch company or operating independently. The data collected in the survey indicate that in Dublin, 51.2 per cent of taxi drivers affiliate to dispatch companies. A case study of the industry in Cork also indicates that roughly half of taxi drivers in the city are affiliated to dispatch companies.

In relation to hackney cabs, while rural operators may not affiliate to radio dispatch companies, in towns and cities the tendency would be for a high proportion to affiliate.

### 8.2 Dispatch companies

There is limited information on the precise number of radio dispatch companies that are currently in operation in Ireland. It would appear that in the Dublin area there are well in excess of fifty companies. Some of these companies have both taxis and hackney cabs affiliated to them, some just have taxis and others just hackney cabs.

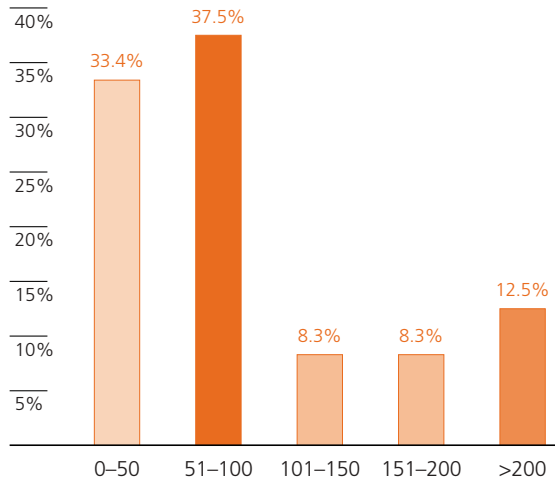
The indication from the trade is that the average dispatch company has probably doubled in size since liberalisation of the market at the end of 2000. Estimates suggest that one third of companies in Dublin have up to 50 cars affiliated to them and 37.5 per cent have between 50 and 100 cars operating on their behalf. Over 10 per cent of companies have over 200 cars affiliated to them, with the largest companies having roughly 500 cars in operation.

A number of companies have working relationships with other companies to transfer business that they do not have capacity to deal with.

The larger companies operate automated dispatch systems coupled with GPS positioning. Others continue to use radio communications only.

<sup>19</sup> A total of 150 drivers were surveyed.

**Figure 8.1: Estimated distribution of dispatch companies in Dublin by number of cabs affiliated**

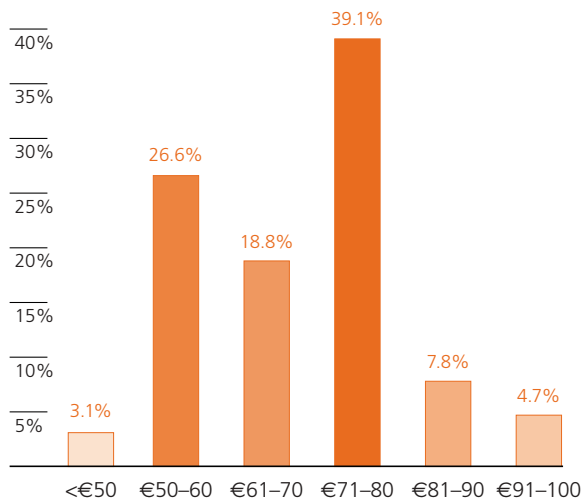


Even when drivers are affiliated to a company, they remain self-employed as owner-drivers. They can decide on the hours that they want to work and when they want to work them. As a result, dispatch companies do not have full control on the numbers of drivers that they have on the road at any one time.

When they affiliate, cab drivers pay a weekly fee to dispatch companies. This fee varies by company and depends on the communications system used and whether the driver operates on a part-time or full-time basis. Data collected in the Survey of Taxi Drivers indicate that the weekly fees payable to the companies range from €45 to €100, with the average paid being €70.70. Figure 8.2 gives an indication of the level of fees paid by all drivers.

**Figure 8.2: Distribution of drivers by weekly dispatch fees paid (%)**

Source: Based on findings of the Survey of Taxi Drivers (2005).



### 8.3 Profiling taxi drivers

The average working week for a taxi driver is 50.3 hours, but this includes both full- and part-time operators. With 11.2 per cent working on a part-time basis,<sup>20</sup> the average working week for full-time drivers increases to 53.8 hours. Just over 20 per cent, or one in five drivers, work more than 60 hours every week. Figure 8.3 overleaf illustrates the distribution of all drivers by the number of hours they work each week.

These hours are spread over a number of weekly shifts. The greatest proportion of drivers (41.1 per cent) work six shifts every week. In total, 80.7 per cent of drivers work between five and seven shifts every week. The data indicate that the average shift length is 9.7 hours. As the average number of paid trips made in a shift was reported to be 16.1, this implies an average of 1.7 paid trips in an hour. This is quite similar to findings of a previous study.<sup>21</sup>

<sup>20</sup> Part-time refers to drivers working 30 hours or less per week. An additional 5 per cent of drivers have another occupation, but work more than 30 hours per week as a taxi driver.

<sup>21</sup> Review of the Taxi and Hackney Carriage Service in the Dublin Area, Dublin Corporation, Oscar Faber and Goodbody Economic Consultants, 1998.

Drivers were asked to indicate the shifts that they would usually work in a typical week. An analysis of the shift data collected indicates that 43.9 per cent of drivers work night shifts only, 22.0 per cent work day shifts only and 34.1 per cent work a mixture of both day and night shifts.<sup>22</sup> For drivers who work day shifts only, the average number of paid trips per hour falls to 1.3, and for those who work night shifts only, the average number of paid trips per hour increases to 1.9. This may be explained by the fact that, as mentioned in Section 5.2 above, the greatest proportion of taxi journeys are taken late at night, and also by the fact that traffic congestion levels are lower at night.

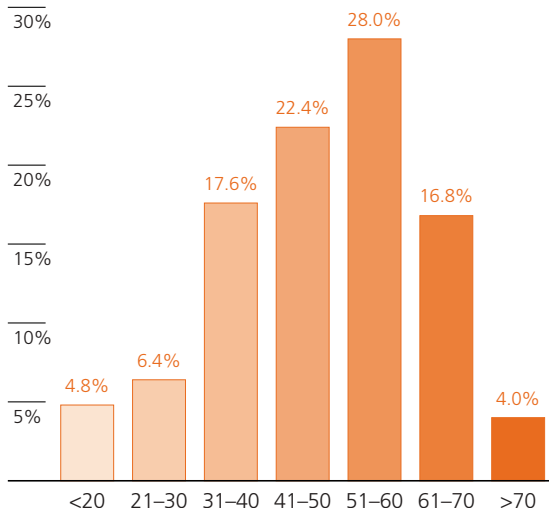
It is possible to compare these three categories of driver by the average number of hours that they work each week. Where drivers working day shifts tend to work the shortest hours (45.0 per week), drivers working both day and night shifts work the longest hours (53.5 per week). Drivers working night shifts only work an average of 50.3 hours each week.

When the three categories are compared by the average estimated annual mileage that they do, drivers doing day shifts only do the least (29,115 miles), and drivers doing both day and night shifts do the most (39,321 miles). Drivers who do night shifts only do an estimated average mileage of 37,065 every year. This compares to the average for all drivers which is 36,067 miles.

The survey asked drivers if they had another occupation. Just under 10.0 per cent reported that they do. The sample size was not large enough to do a very detailed analysis, however the majority (77.7 per cent) of those who do have another occupation reported working more than 30 hours a week in that occupation. When these hours working in another occupation are combined with hours driving a taxi, the total hours worked exceed 60 for all respondents. However, there is no evidence that combined working hours typically exceeded that of the full-time drivers that work more than 60 hours.

**Figure 8.3: Distribution of drivers by hours worked**

Source: Based on the findings of the Taxi Driver Survey (2005).

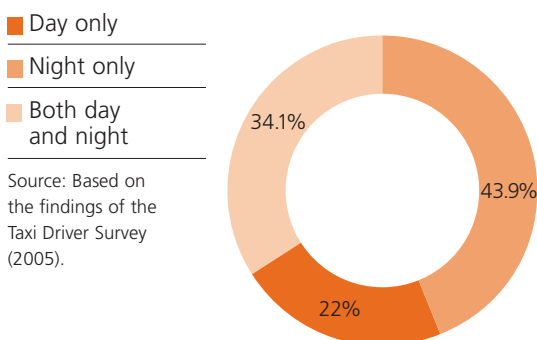


**Table 8.1: Distribution of drivers by number of shifts worked per week**

Number of shifts	Proportion (%)
2 shifts	1.6
3 shifts	4.8
4 shifts	12.9
5 shifts	36.4
6 shifts	41.1
7 shifts	3.2
All drivers	100.0

Source: Based on the findings of the Taxi Driver Survey (2005).

**Figure 8.4: Distribution of drivers by typical shift pattern worked (%)**



Source: Based on the findings of the Taxi Driver Survey (2005).

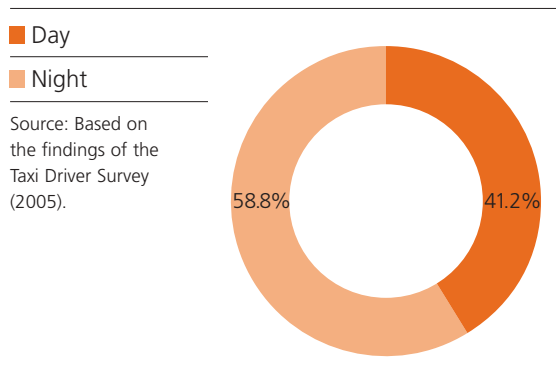
<sup>22</sup> A night shift is defined as one that includes working post-midnight.

**Table 8.2: Average weekly hours worked and average annual mileage by shift working pattern**

Shift working pattern	Average hours worked per week	Average annual mileage
Days only	45.0	29,115
Nights only	50.3	37,065
Mix of both days and nights	53.5	39,321
All drivers	50.3	36,067

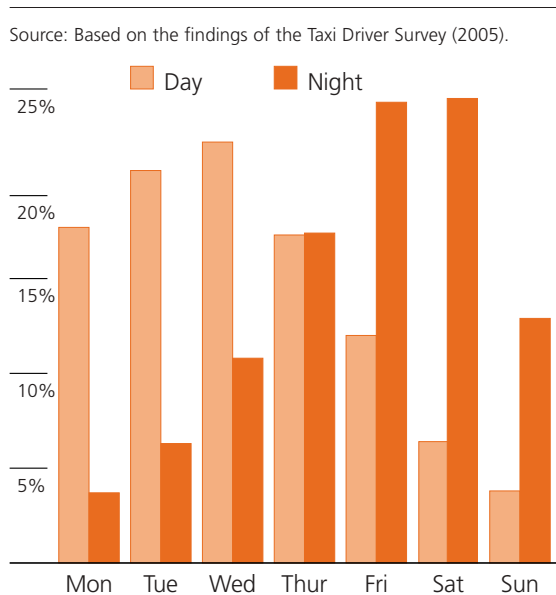
Source: Based on the findings of the Taxi Driver Survey (2005).

**Figure 8.5: Breakdown of all shifts by day and night (%)**



Source: Based on the findings of the Taxi Driver Survey (2005).

**Figure 8.6: Distribution of day and night shifts by day of week**



Source: Based on the findings of the Taxi Driver Survey (2005).

<sup>23</sup> Based on drivers working 48 weeks per year.

### 8.4 Taxi supply

By aggregating all shifts worked by all drivers, it is possible to get an indication of the fluctuations in taxi supply by day and night, and by day of the week. Figure 8.5 illustrates the breakdown of all shifts worked by whether they were during the day or at night. Just over half (58.8 per cent) of all shifts are worked at night, indicating a slightly greater supply of taxis at night than during the day.

The majority of day shifts tend to be worked during the first half of the week. It is worth noting that the quietest day of the week for day shifts is Sunday, despite the fact that a higher fare regime operates on that day. This is perhaps an indication of a reduced demand by consumers for taxis on Sundays, or it may be the case that drivers like to take Sunday as a day off, as do many other workers.

The majority of night shifts are worked at the end of the week, with the greatest supply of taxis being on Friday and Saturday nights. Figure 8.6 below illustrates the distribution of all day shifts and all night shifts worked by day of the week

### 8.5 Earnings

The consultants have developed a cost-revenue model for the taxi industry that can be used to estimate the income of taxi drivers. The model takes the estimated annual fare revenue generated by a driver and then deducts the estimated annual operating costs associated with owning and running a taxi. Such costs are usually categorised as standing and running costs. The balance is the estimated income of the driver.

#### 8.5.1 Annual fare revenue

Based on the survey data, there are a number of ways of estimating annual fare revenue. Three different methods are described below.

The first estimate is based on fare revenues as reported by drivers in the Driver Survey, conducted in the Dublin area. The average weekly fare revenues as reported by full-time taxi drivers is €739, with the maximum amount reported standing at €1,300. These average reported weekly revenues translate into annual fare revenue<sup>23</sup> of €35,472.

The second estimate is calculated using data on hours worked, trips per hour and average fares,

derived from the Driver Survey. Using these data, the average weekly fare revenue of a full-time taxi driver increases to €798, which in turn translate into annual fare revenues of €38,304.

Any estimates will be sensitive to the average fare used in the calculation. For the third estimate, the consultants used data from both the survey of drivers and the Household Survey to build up average fares for both off-peak (lower fare rate) and peak (higher fare rate) trips. Data from the Driver Survey indicate that on average 60.3 per cent of a full-time taxi driver's work will generate fares at the higher rate. The third estimate produces annual fare revenues of €54,611, or €1,137 weekly.

The data gathered in the driver survey relate to fare revenues in the Dublin area only. Although fare revenues will often tend to be lower in more rural areas, case studies carried out in Sligo and Cork indicated that by working at peak times,<sup>24</sup> drivers could generate fare revenues in excess of €800 per week. For the purposes of this report, the consultants decided to use average fare revenues of €900 per week. This gives rise to annual fare revenues of €43,200.

It should be remembered at this point that all of these estimates relate to fare revenues before related costs.

### 8.5.2 Cost structures

The operating costs involved in owning and running a taxi can be broken down into standing costs and running costs.

The annual standing costs of operating a taxi include the annual costs of servicing a loan for the car<sup>25</sup> (capital plus interest), insurance, road tax, taxi licence renewal, radio rental, NCT and the equivalent annual cost of renewing both an ordinary and SPSV driver's licence. Costs relating to meter adjustments and verifications are also included and for modelling purposes are averaged over two years.

The annual running costs relate to the day to day costs of running a taxi. They include fuel and cleaning costs, as well as the costs of spare parts, servicing, and the replacing of tyres. There are also a number of miscellaneous costs that drivers incur that might include the purchase of rolls of paper for receipt printers, receipt books, and business cards.

Table 8.3: Annual operating costs

Annual standing costs	€
Vehicle costs	2,793
Insurance	2,748
Road tax	72
Taxi licence renewal	125
NCT	49
Radio rental	3,676
Meter calibration and verification	69
Driver's licences	5
<i>Total annual standing costs</i>	<i>9,537</i>
Annual running costs	€
Fuel	5,097
Servicing	1,041
Spares	529
Tyres	565
Cleaning	680
Miscellaneous	300
<i>Total annual running costs</i>	<i>8,212</i>
<b>Total annual operating costs</b>	<b>€17,749</b>

Source: Goodbody Economic Consultants.

Note: Drivers may use their vehicles for personal as well as business travel. The estimation of vehicle costs above does not deduct personal travel costs.

Some of the costs included in the model are fixed. These would include road tax, taxi licence renewal fees and NCT fees.

As Table 8.3 above indicates, total annual operating costs are estimated at €17,749.

In reality, operating costs will inevitably vary by driver, depending on a number of things such as whether or not he or she is affiliated to a radio dispatch company and the type of vehicle operated.

For individual drivers providing a wheelchair accessible service, costs would rise significantly. The initial capital outlay on the vehicle would be substantially higher.<sup>26</sup> When the driver wants to replace the vehicle, the trade-in value is also likely to be lower as he or she will be selling to a smaller market. With fewer wheelchair accessible taxis

<sup>24</sup> Friday and Saturday nights.

<sup>25</sup> The vehicle used in the model is a second hand, four-year-old Toyota Avensis Saloon with a 1.8 litre petrol engine, which corresponds to the typical vehicle used by drivers.

<sup>26</sup> The cost of a typical van-type vehicle that can be converted for use as a wheelchair accessible vehicle (Fiat Scudo Combi with a 2.0 litre diesel engine) is €27,445, before any conversions are made. The cost of converting this vehicle type is estimated to be €8,228.

**Table 8.4: Typical income of a taxi driver**

Revenue and cost category	€
Annual fare revenue	43,200
Annual costs:	
Annual standing costs	9,537
Annual running costs	8,212
	17,749
<b>Gross annual income</b>	<b>€25,451</b>

Source: Goodbody Economic Consultants.

in operation, the empty mileage<sup>27</sup> would also be likely to increase because of the greater likelihood of being dispatched to more distant pick-up points. As a result the driver may realise fewer trips per shift and therefore see a decrease in fare revenues. The effects that operating a wheelchair accessible taxi can have on economies are discussed in greater detail in Section 11 of this report.

### 8.5.3 Net annual fare revenue

Using average weekly fare earnings of €900, the estimated income of a full-time taxi driver is €25,451 after costs. This is indicated in Table 8.4 above.

The most recent CSO data available on employee earnings relates to 2004. In 2004, average annual earnings in all industries amounted to €29,208. The average number of hours worked each week in all industries was 40.0 hours.<sup>28</sup>

Where the typical taxi driver earns on average almost €4,000 less per annum than industrial employees, he or she also works an average of 13.8 hours more every week. For a taxi driver to generate an income

of over €25,000 per annum, he or she will have to work a combination of both day and night shifts, and an average of 53.8 hours every week, which is substantially more than other sectors in the economy. The comparison is made clearer when average hourly earnings are compared. The average hourly earnings for taxi drivers are significantly lower than those for industrial workers.

## 8.6 Summary

Data collected indicate that roughly half of all taxi drivers are affiliated to radio dispatch companies. The indications from the industry are that since liberalisation of the market, these companies have doubled in size.

The average working week for a taxi driver operating on a full-time basis is 53.8 hours. To achieve higher fare revenues, it is also necessary for taxi drivers to work night shifts. Almost 44 per cent of all taxi drivers work night shifts only and 34.1 per cent work a mix of both day and night shifts.

While earnings are difficult to estimate and fare revenues will vary considerably depending on the average fare used. Using average weekly fare revenues of €900, annual fare revenues are estimated to be €43,200 before related costs. With annual operating costs estimated at €17,749, gross income is reduced to €25,451. The reality of these earnings becomes clear when the hours worked are taken into consideration. Taxi drivers earn significantly less per hour than the average industrial worker.

**Table 8.5: Gross taxable incomes, hours worked and hourly earnings for industrial workers and taxi drivers**

	Average annual earnings	Average number of hours worked each week	Average earnings per hour
All industries	€29,208	40.0	€14.04
Full-time taxi drivers	€25,451	53.8	€9.86

Source: CSO and based on the findings of the Survey of Taxi Drivers (2005).

<sup>27</sup> For an average taxi operating on a full-time basis, just 56.8 per cent of annual mileage done is earning mileage. The other 43.2 per cent is empty mileage.

<sup>28</sup> Source: Industrial Earnings and Hours Worked, CSO, March 2005.

# 9

## Improving market organisation and operation

### 9.1 Introduction

This section of the report considers proposals for reform of the organisation and operation of the cab market.

### 9.2 The dual system

As indicated in Section 2, the cab market is organised around four distinct types of SPSV licence viz. those for taxis, wheelchair accessible taxis, hackneys and limousines. The fundamental distinction, of course, is between public hire vehicles and private hire vehicles. This division of the market does not occur in all jurisdictions. For example, in the Netherlands, Norway and Sweden legislation provides for public hire vehicles only. In other countries, such as Belgium, France and Spain, private hire vehicles are legislated for, but their market share tends to be small. In contrast, countries, such as the UK, Germany, Austria, and Switzerland have dual markets in which private hire plays a significant role.

In the Netherlands and Sweden, the abolition of private hire has been accompanied by the abolition of taximeter areas, so that taxis operate on a nation-wide basis.

As a result of liberalisation of access to the taxi market in Ireland in 2000, the number of private hire vehicles has diminished significantly in taximeter areas. This has prompted many market observers to question the continuing relevance of the private hire category.

There are problems associated with a dual market. The problems in enforcing the restriction on private hire vehicles plying for hire have already been mentioned. It is also apparent that, among the public at large, the distinction between taxis and hackneys is often not understood, leading to

disputes about fares for journeys outside taximeter areas, for example. Based on these and other factors, a large number of representations called for abolition of the dual licensing of taxis and hackneys.<sup>29</sup>

A key feature of the hackney market is that it is less regulated in that a maximum fares regime is not imposed. This is true of dual systems in other countries as well as in Ireland. A maximum fares regime is usually required to deal with the fact that it is difficult to operate a competitive market for street work: the capacity of cab users to bargain for lower fares is limited and the temptation for drivers to charge exorbitant fares exists. In Section 12 below, it is argued that the system of maximum fares be retained for taxis.

Accordingly, one of the benefits of a dual structure is that it permits flexibility in fares for non-street work. Consumers and service providers are free to agree fares. However, if a taxi-only system were to be introduced, consumers could be less inclined to bargain for lower fares.

Our surveys show that in practice, there is a relatively low level of bargaining for either taxi or hackney fares. This is undoubtedly in part due to a lack of awareness on the part of consumers. One of the recommendations of Section 10 below is that a programme of consumer education be introduced that would cover this and other issues. There is a possibility that the existence of a taximeter inhibits and may continue to inhibit consumers from bargaining for lower fares. In these circumstances,

<sup>29</sup> The separate licensing of limousines would remain.

retention of the dual system would be beneficial. On this basis, it could be argued that the dual system should be retained pending evaluation of the results of a programme of consumer education.

The second argument for retention of the dual system is related to ensuring a ready supply of cab services. As has been indicated, supply of hackney services by part time drivers is a valuable aspect of the current system, particularly in rural areas. Essentially, part-time operators can enter the hackney market, without incurring significant costs in terms of the fitting of taximeters or the acquisition of a taxi licence. In Section 13 below, it is recommended that vehicle licence fees should be re-balanced to reduce the costs of acquisition and raise renewal costs. If this were done, the costs of entry to the taxi market would be reduced. However, the costs of fitting and the inconvenience of having taximeters in their vehicles would continue to be some deterrent to entry.

There is a minority of drivers who opt to drive hackneys rather than taxis on grounds of security. These drivers, who are often in older age groups, are concerned about the security aspects of picking up consumers in street. They prefer to have the peace of mind of responding to telephone bookings where the address and/or place of work of the consumer is known, and where this acts as a deterrent to violent behaviour or non-payment of the fare. While, if a taxi-only system were to operate, they would have the option of concentrating on the telephone market, these drivers are concerned about the obligation not to refuse service that exists for taxi operation. Viewed in this context, the dual system tends to encourage this type of driver to supply services.

These arguments for retention of the dual system, while valid, are hardly overwhelming, when set against the advantages of simplicity and ease of control of a single system. However, it is recommended that the dual system be retained in the short term, and the issue reconsidered again when other reforms such as consumer education, greater controls and re-balancing of licence acquisition charges have been implemented.

### 9.3 Taximeter areas

When Section 41 of the Taxi Regulation Act, 2003 is commenced, the Commission will have the authority to declare any area to be a taximeter area. In these circumstances, it is useful to consider the issues that need to be addressed.

Section 4 indicated a number of problems with the current operation of taximeter areas:

- Several significant urban areas have not declared taximeter areas, and this is causing problems as some hackneys are operating as taxis in contravention of the law and in the absence of officially designated taxi ranks; the level of service is also reduced, particularly to those without local knowledge, such as tourists;
- In many cases, the declared taximeter areas are very small, so that most taxi trips are not subject to maximum fare control or metering; and,
- The taximeter areas often have little regard to the settlement pattern, so that parts of built-up areas are sometimes excluded; this often occurs where the built up area straddles local authority boundaries.

There are essentially three options for the operation of taximeter areas:

- A town-based system;
- A county and city-based system; or,
- A national system.

#### 9.3.1 A town-based system

It is clear that there is a requirement for declaration of taximeter areas in most urban areas of significance, in order to provide the necessary street services within the law. Accordingly, a reform of the current system would see the Commission, subject to the necessary consultations, progressively declaring areas centred on all towns above, say, 7,000 in population to be taximeter areas.

The current practice is to delineate taximeter areas either on the basis of distance from the town centre or on the basis of the functional area of the local authority. At present, a decision to extend the boundaries of taximeter areas might impose additional costs on drivers because of lengthy return trips without a paying passenger.

If there is a graduated fare structure in place that compensates for empty running, as recommended in Section 12, then a wider taximeter area could be applied.

Thus, under this proposal, the taximeter area would be determined as follows:

- For urban areas other than Dublin, set a taximeter area based on, say, a 15 kilometre distance from the town centre;
- For Dublin,<sup>30</sup> introduce an approximately 30 kilometre radial area; and,
- Where as a result of the above, taximeter areas overlap, operation in the area of overlap will be available to taxis from both areas.

If the area of overlap is significant and has a significant population, then consideration could be given to establishing a common taximeter area.

### 9.3.2 A county and city-based system

Another option available to the Commission is the introduction of taximeter areas based on county or city local authority administrative areas, of which there are 34.<sup>31</sup>

In Section 12 below it is recommended that a tiered fare structure be adopted that will compensate drivers for longer journeys, making it feasible for all journeys to be done on the meter, regardless of destination. This will remove the maximum fare control function of taximeter areas. The remaining functions of taximeter areas will therefore be the delineation of areas within which taxis can ply for hire and stand at ranks.

In the county and city system, each county or city local authority administrative area would be a taximeter area for plying for hire and standing at ranks, and would form the basis for the licensing area. Taxis would be obliged to accept all trips of say up to 30km, even to destinations outside the taximeter area, but work could only be sought in the taxi's county or city council area of licensing. With this option, as with the town-based option, knowledge testing of drivers could continue to be applied.

The main drawback of this system would be that the obligation to provide a service would be based on the distance of the trip, rather than geographical boundaries. This might give rise to disputes between consumers and taxi drivers, and could be exploited by drivers to refuse service.

### 9.3.3 National system

One of the options available to the Commission is the introduction of a national taximeter area. Sweden, Finland, and the Netherlands currently operate national taximeter areas. With regard to the first two, the organisation of taxi services continues to be local, with for example, there being a requirement in Finland that taxi drivers return as quickly as possible to their administrative area. The Netherlands operates as a truly national system, and this may be facilitated by the very dense settlement pattern in that country.

There would appear to be two major drawbacks associated with a national system in the Irish context:

- Service providers could not be confined to operate in areas for which they have the geographic knowledge; and,
- Organisation and control would be rendered more difficult. An example of this might be the movement of taxis around the country when big events are on, leaving local areas without services and leading to disruption in the area hosting the event.

### 9.3.4 Overview

Both the town-based and county-based systems address the main issues of concern. Thus, they both extend the area in which taxis can ply for hire to cover the major settled areas. They also increase the area over which taxi drivers have an obligation to provide a service. As it is proposed that all fares be metered, both options extend maximum fare control.

<sup>30</sup> This would incorporate the four Dublin local authorities as one taximeter area.

<sup>31</sup> The City Councils are Dublin City Council, Cork City Council, Limerick City Council, Galway City Council and Waterford City Council.

#### 9.4 Compliance with SPSV regulations regarding plying for hire

Apart from maximum fare control, taxis and hackneys are distinguished by virtue of the fact that hackneys cannot stand at ranks or ply for hire. The latter provisions are often not observed by hackneys in towns outside of the major conurbations. This problem is exacerbated in towns, for which a taximeter area has not been declared. The extension of the number of taximeter areas as envisaged above would mitigate but not eradicate the problem. Other proposals contained in this report, such as the re-balancing of taxi licence charges and the increased provision of ranks would help improve the situation.

At present, it is clear that the level of enforcement of these regulations is inadequate. There is a pressing need for more enforcement resources to be applied.

#### 9.5 Provision of ranks

The provision of sufficient permanent and temporary ranks is a vital factor in the successful operation of taximeter areas. The designation of ranks is the responsibility of the local authority, in whose functional area the taximeter area is situated. Thus, the Commission has no direct role in their provision. However, there is a real need to integrate the decision-making of the Commission and the local authorities. Consideration should be given to amending the provisions of Section 84 of the Road Traffic Act, 1961 to require the local authorities to consult on a regular basis with the Commission regarding the provision of ranks. It would be advantageous also, to arrange for the drawing up of design guidelines for ranks, which would incorporate consideration of the needs of people with disability.<sup>32</sup> The DIT report makes recommendations in this regard.

It should be noted that, under Section 11 of the Taxi Regulation Act, the Taxi Regulator will have powers, when the section is commenced, to provide financial assistance to local authorities towards the provision of infrastructure for cabs.

<sup>32</sup> And other issues such as barriers and CCTV.

<sup>33</sup> With regard to limousines, it may be argued that there are spillover benefits to the State, if foreign industrialists and other high net worth individuals benefit from a high level of limousine services.

#### 9.6 Use of Quality Bus Corridors and bus lanes by cabs

Currently, taxis are allowed access to Quality Bus Corridors and bus lanes under the National Traffic and Parking regulations of 1997 and 1998. There have been repeated demands from hackney and limousine interests to extend use to vehicles with these classes of licence. While this is not a matter over which the Taxi Regulator has any jurisdiction, it is relevant to the efficient operation of the market, which is one of the objectives set for the Commission in the Taxi Regulation Act, 2003.

Presumably, the decision to allow taxis to use bus lanes was based on the view that they are public service vehicles, and that access to the bus lanes would make their operations more efficient. This, in turn would provide benefits to the consumer in that a higher level of service would be forthcoming and to the travelling public as a whole, if car commuters are encouraged to switch to public transport.

Similar arguments apply to hackneys, and to a lesser extent to limousines.<sup>33</sup> Thus, the restrictions on these vehicles must be justified by other factors. The first reason why access has been so restricted is the view that the additional vehicles will cause congestion in the bus lanes to the detriment of bus and coach operation. This is not a strong argument for two reasons:

- Since liberalisation, the numbers of hackneys has declined significantly and thus their impact on lane capacity will be marginal; and,
- Buses are the slowest moving vehicles in bus lanes, and capacity is largely determined by their operating characteristics.

The second reason is that hackneys and limousines are not as visible as taxis by virtue of not having a roof sign. Thus, private motorists may believe that the lanes are being abused by other motorists, with a resultant break-down in compliance. This is a more real concern. However, if it were to become a problem, it could be surmounted by increased consumer information, temporary control measures and improved identification. There is a strong prospect that it would not become a problem, given the high level of compliance with bus lanes currently being experienced. Accordingly, it is recommended that this concession to hackneys and limousines be made in order to promote increased efficiency in the cab market.

### 9.7 Licensing of dispatch companies

Dispatch companies play a crucial role in delivering cab services to consumers. For telephone-booked services, they are the first point of contact for consumers, and should be the initial focus of complaints from consumers. It would be appropriate that such companies adhere to a set of minimum standards. At the same time, these companies are small in size and it would not be appropriate to burden them with unnecessary administrative or compliance procedures. A minimum approach would be to require that these companies be licensed by the Commission, and be subject to a small number of licensing conditions including tax compliance and provision of disability awareness training for their operatives. They would be further required to maintain an up-to-date register of affiliated drivers and their vehicles for inspection by the Commission. In order to increase consumer awareness of the scale of services being offered, the Commission should make available to the consumer details of the number and type of cabs operated by these individual companies, highlighting the number of wheelchair accessible vehicles that they operate. This will ensure greater transparency for the consumer in relation to the scale and potential quality of the service being offered.

### 9.8 Conclusions

The dual system of taxi and hackney licensing should be retained in the short term, and the issue reconsidered again when other reforms such as consumer education, greater controls and re-balancing of licence acquisition charges have been implemented.

There is a need to increase the number and extend the geographic boundaries of taximeter areas to ensure that they reflect settlement patterns. Two options are proposed:

- A town-based system to extend taximeter areas to towns above 7,000 population, and to have radial areas of 30km in Dublin and 15km elsewhere; or,
- A county based system with an obligation on the taxi driver to provide services for trips up to 30km.

These steps will reduce the possibility of illegal operation of hackneys in certain towns. However, there is a pressing need to apply greater resources to enforcement of the SPSV regulations.

Consideration should be given to amending the provisions of Section 84 of the Road Traffic Act, 1961 to require the local authorities to consult on a regular basis with the Taxi Regulator regarding the provision of ranks.

There are strong arguments on efficiency grounds for extending access to bus lanes and Quality Bus Corridors to hackneys and limousines. This is all the more the case, as hackney numbers have declined in the major urban area.

A system of licensing of dispatch companies should be introduced.

## 10

Raising the quality  
of cab services

## 10.1 Introduction

Over 90 per cent of adults surveyed felt that cabs provided a good level of service, while only 3 per cent expressed an opposite viewpoint. With regard to tourists surveyed, only 6 per cent perceived the service to be poor or very poor. Only 2 per cent of businesses expressed themselves dissatisfied with the service provided by cab companies. These are impressive figures and present a very positive view of the industry post liberalisation. Nevertheless, despite high overall levels of satisfaction, concerns have been expressed in relation to certain aspects of the trade in representations made to the Commission and in the public meetings and consultations held as part of this study. This section of the report explores some of these issues.

## 10.2 Vehicle quality

In Section 3 of this report, it was indicated that the median age of taxis is just over six years and the equivalent for hackneys is approximately seven years. Cabs are much less likely to be bought new than private cars. However, the surveys undertaken for this study do not support the view that consumers are particularly concerned about vehicle quality or age. Only 6 per cent of domestic adults interviewed disagreed with the view that vehicle quality is good. Tourists had a somewhat more negative view with 13 per cent indicating that vehicle quality is poor and 36 per cent believing that the quality of vehicles in their own country is better.

Out of approximately 21,000 cabs in the country, only 750 or 3.7 per cent of the total are new cars. The argument is often made that abolition of the Vehicle Registration Tax (VRT) and/or Value Added Tax (VAT) on car purchase would provide an incentive to drivers to purchase new and so the quality of the cab fleet would be enhanced. The major concern

regarding vehicle quality relates to wheelchair accessible taxis, with particular concerns around the absence and poor condition of in-cab wheelchair handling equipment, for example. These issues are addressed in the Dublin Institute of Technology report, which also makes a number of recommendations that impinge on vehicle quality generally, including stipulations regarding minimum vehicle sizes. Proposals in relation to the remission of VRT in respect of wheelchair accessible cabs are made in Section 12 below.

Another proposal often put forward is for the introduction of a standard vehicle of reasonably high specification. It is clear from the analysis in Section 8 that the incomes of taxi drivers at present would not support the additional capital expenditure entailed in such an approach. Neither are there concerns about vehicle quality at present that would require such a step.

### 10.3 Standard colour for vehicles

In several jurisdictions abroad, cabs are of a standard colour. It has been suggested that a similar approach be adopted in relation to taxis in Ireland. The rationale for such an approach is presumably to heighten the visibility of taxis for consumers.

With regard to consumers, there is evidence that they do not have particular problems in terms of recognition of cabs. Less than 2 per cent of domestic cab users felt that taxis were not easily distinguishable, while the equivalent figure for tourists was 10 per cent. Introducing a standard colour could place a number of restrictions and costs on drivers. For example, re-spraying of a taxi could cost in excess of €2,500.<sup>34</sup> It is not considered that the recognition problem is generally of a scale as to warrant the introduction of a standard colour. However, people with visual impairment would undoubtedly benefit from standardisation of colour, and their representatives have argued strongly for this change. In Section 11 of the report, which deals with improving services for people with disability, a limited proposal is made regarding standardising the colour of wheelchair accessible taxis.

### 10.4 In-cab consumer information

At present, legislation requires the display of certain information in-vehicle.

Taxis are required to have, where they can be easily seen by a passenger, driver details including a photograph, the driver's name, signature and their SPSV driver licence serial number. The name and telephone number of the holder of the taxi licence should also be displayed, as well as the licence number of the taxi, the licensing authority name, address and telephone number and a notice of maximum fares for the taximeter area within which the taxi is licensed.<sup>35</sup>

The taximeter must also be fitted so that a person inside the cab can easily see and read it.<sup>36</sup>

With respect to hackneys, a notice must be displayed within each hackney on the dashboard on the passenger side and on the rear of at least one of the front seats. The notice must contain the hackney licence number, the name of the licensing authority, and the name of the driver and his or her SPSV driver licence number. The word 'hackney' or 'hacnaí' must be included in the information.<sup>37</sup>

During the course of the study, both domestic cab users and tourist users were asked for their assessment of these arrangements. In general terms, there were few complaints. For example, with regard to the fare card, only 13 per cent of domestic users and 12 per cent of tourists felt that the fare card was not displayed in a clear fashion. Some 9 per cent of domestic users and 10 per cent of tourists expressed dissatisfaction with the display of driver and cab licence details. Only 8 per cent of domestic users and 6 per cent of tourists had problems with the visibility of meters.

The research also questioned tourists on the need for customer information to be displayed in another language. Over half of respondents felt it was desirable to do so, with French being the marginally preferred language.

The need for information on customer complaint procedures has already been mentioned. It would appear essential that such information be presented in a number of foreign languages.

Accordingly, the following recommendations are made with regard to in-cab customer information:

- That driver photograph, driver name, SPSV driver licence serial number and driver signature be displayed both in the front and rear of all taxis and hackneys; and,
- That this be accompanied by information on customer complaint procedures with summary details in a number of foreign languages.<sup>38</sup>

### 10.5 Driver qualities and standards

Despite comments to the contrary, Irish cab drivers are very highly regarded by consumers. Only 4.4 per cent of domestic cab users and 13.0 per cent of tourists disagreed with the view that drivers are helpful and friendly. Over 86 per cent of tourists indicated that Irish cab drivers are at least as helpful and friendly as their counterparts in their own country. People with disability, who may have reason to be aggrieved at the level of service they receive from cabs, also have strongly positive views of drivers, with only 6.2 per cent disagreeing with the view that they are helpful and friendly.

<sup>34</sup> Estimated by DIT in their report, *National Review of Vehicle Standards in Small Public Service Vehicles*, that was carried out in parallel to this review.

<sup>35</sup> S.I. 136 of 1995.

<sup>36</sup> S.I. 367 of 2000.

<sup>37</sup> S.I. 255 of 2000.

<sup>38</sup> Limousines are not included in these recommendations.

However, there are a number of areas of concern:

- During the consultations for this study, it became apparent that some drivers were unsure of a number of aspects of the SPSV regulations, including issues relating to the relative roles of taxis and hackneys and maximum fares;
- Many drivers are not fully aware of the needs of people with disability or of good practice in providing services to this group. For example, fears were expressed by drivers regarding assisting consumers in entering and exiting the vehicle, where this involved physical contact; and,
- Representations made to the Taxi Regulator indicate that a minority of drivers dress inappropriately, use bad language, and have personal hygiene problems.

## 10.6 Current procedures for ensuring adequate driver standards

### 10.6.1 Legislative background

In order to drive a cab, it is necessary to hold a small public service vehicle driver's licence. The Garda Commissioner must satisfy himself that an applicant for a small public service vehicle driver's licence is a fit and proper person to hold a licence and has an adequate knowledge of:

- The general traffic regulations;
- The area in which he or she normally proposes to make his or her services available as a driver of SPSVs and of the local traffic and parking regulations applying to that area; and,
- The regulations applying to small SPSVs.<sup>39</sup>

Since 1999, the public service vehicle driver's licence has been valid for a period of five years. The successful applicant is granted a driver's badge bearing a serial number and such words as the Garda Commissioner may direct.

The Garda Commissioner must also satisfy him or herself that the applicant has not been convicted of an offence that would render him unsuitable to hold a SPSV driver's licence. First time applicants are required to hold an unendorsed driver's licence.<sup>40</sup>

A person cannot drive a taxi in a taximeter area unless the public service vehicle driver's licence is endorsed (stamped) with a statement that the Garda Commissioner is satisfied that the person has an adequate knowledge of that taximeter area.

The period of validity of the licence has varied over the years. From 1970 to 1977, the period was three years. In the latter year it was changed to one year, before becoming five years in 1999. The change to a five-year period was made because of the burden of annual licensing on Garda resources. However, there is now a concern that five years is too long a period. For example, a driver may be convicted of an offence and serve a prison term within the five year period, and this may or may not come to the notice of the relevant authorities until the renewal date. It is recommended that consideration be given to reducing the renewal period to, say, two years.

### 10.6.2 Public service vehicle driver's licence examinations

In practice, the applicant for a public service vehicle driver's licence must sit an examination. The examination set by the Carriage Office in Dublin is probably the most rigorous. This is a written examination, but arrangements are made for oral examination in exceptional circumstances. There is a widespread view among existing cab drivers that the test is too easy in respect of knowledge of the geographical area in which the driver proposes to operate. To remedy this, a practical test has been suggested that would entail route finding under actual operating conditions.

The current test as set in Dublin comprises over 100 questions relating to the public service vehicle legislation and to knowledge of the area. The area knowledge is assessed via questions on location of landmarks, such as hotels, and on route finding. The Carriage Office has fifteen different papers that are rotated. Applicants are required to achieve in excess of 70 per cent correct answers. The current annual failure rate is approximately 30 per cent of all candidates, including candidates repeating the examination after failure on a previous occasion.

Having reviewed the examination procedure, it would appear that the knowledge test is reasonably rigorous. It is noted too that, in practice, drivers can avail not only of maps and guides, but also of modern GPS based route-finding technology.

<sup>39</sup> S.I.200 of 1970.

<sup>40</sup> Section 36 of the Taxi Regulation Act 2003 (not yet commenced) will strengthen these arrangements. It provides for a system of automatic disqualification from applying for or holding a small public service driver or vehicle licence in respect of persons who have been convicted of one of a range of very serious offences, including murder, manslaughter and various sexual, drug trafficking and other offences. A person who is affected by these provisions can request the courts to allow them to apply for a licence in certain restricted circumstances. In addition, where a person has been convicted of one of a number of other serious traffic offences after the commencement of the relevant subsection, he or she will be disqualified for holding a licence to drive a small public service vehicle for a period additional to any driving disqualification that is applied.

Accordingly, introduction of a practical test is not seen as a priority, given the increased resources that it would entail, and the possibility that it might act as a barrier to entry to the market.

### 10.7 Driver conduct

There are a number of obligations placed on the driver in terms of conduct. Legislation stipulates that it is the duty of a driver of a taxi to proceed at a reasonable speed and by the most expeditious route or a route requested by the passenger, and to wait as directed.<sup>41</sup> Other rules of conduct for a driver of a taxi include:

- Being in constant attendance of the vehicle;
- Behaving in a civil, orderly and respectful manner;
- Complying with reasonable requests;
- Being clean in person and of decent apparel;
- Giving all reasonable assistance and information to the passenger; and,
- When requested by the person, affording reasonable assistance in loading and unloading luggage and in removing luggage to the entrance of a house, station or other place.

Similar requirements are not currently imposed on hackney drivers. Under the Taxi Regulation Act, 2003, the Taxi Regulator will, when it is commenced, have the powers to make regulations relating to the drivers of cabs. It is suggested that common rules of conduct for taxis, hackneys and limousines be introduced after commencement of this section of the Act.

A code of conduct for drivers is also proposed as part of a Customer and Driver Charter (see Section 10.10 below).

### 10.8 Driver education and training

In order to maintain and improve the quality of service offered many industries undertake significant training of their workforce. Currently, in relation to the cab industry, many drivers undergo training provided by a commercial training organisation prior to taking the examination for the public service vehicle driver's licence. Given the deficiencies in knowledge outlined above it is recommended that attendance and qualification through State approved

training courses be part of the requirements for cab drivers. Training would comprise induction training and professional development training.

Induction training is part of the requirements for access to the cab market in many countries, with up to 80 hours of training provided.

At a minimum, the induction course would comprise tuition on:

- The relevant legislation (small public service vehicle regulations, road traffic acts and so on);
- Map reading skills;
- Customer relations;
- Compliance with health and safety at work legislation;
- Disability awareness training;
- Wheelchair handling training;
- Meter and radio-communications knowledge; and,
- Good driving practice

Professional development training would be undertaken, say, every four years, and would comprise a half-day refresher course, aimed at updating knowledge.

### 10.9 Safe operation of the cab

Since the taxi market was liberalised, part-time taxi driving has become more prevalent. The survey of Dublin taxi drivers revealed that just under 10 per cent have another occupation, and that the majority of these worked more than 30 hours in that occupation. The total hours worked in both taxi driving and their other occupation typically amounted to more than 60 hours per week. This has given rise to concerns about the safe operation of cabs in such circumstances, as fatigue is a significant factor in road accidents generally.

It should be recognised that if it is a problem, it is likely to affect full-time cab drivers as well. Again, the survey of Dublin taxi drivers revealed that just over 20 per cent work more than 60 hours per week, with a small minority of approximately 4 per cent working more than seventy hours.

<sup>41</sup> S.I.191 of 1963

There are two pieces of legislation relating to working hours. The Organisation of Working Time Act, 1997, establishes maximum weekly working hours for employees, but does not cover self-employed persons. The EU Regulation 3820/85 sets maximum hours for drivers, but covers drivers of vehicles with eighteen or more seats. Thus, there is no general legislative restriction on the hours worked by cab drivers. However, under the Taxi Regulation Act, 2003, the Taxi Regulator has powers to make regulations pertaining to the control and operation of small public service vehicles including the conditions subject to which the vehicle may be operated as a small public service vehicle.

In some other countries, maximum working hours are imposed on cab drivers and controlled via logbooks or tachographs. It would be possible to introduce legislation that would impose maximum working hours for drivers, differentiating between full time drivers, those with another part time occupation and those with another full time occupation, and to monitor the relevant hours using a tachograph or similar device. Such an initiative could require separate evaluation to establish the need for it. It is also recognised that a number of practical issues arise that could be difficult to resolve. It is recommended that further research on these issues be undertaken. The National Roads Authority Road Accident Database could be used in conjunction with the vehicle mileage data of this report, to assess the safety record of cab drivers as a whole.

## 10.10 Complaints procedures

The survey results presented in Section 6 support the view that consumers are confused as to where to make complaints and that for a considerable proportion of those who do, the complaints are not resolved to their satisfaction.

At present, the procedures and institutional arrangements for facilitating consumers in making complaints suffer from a number of deficiencies as outlined below.

It would be normal to expect, as with any service, that the taxi and hackney dispatch centres would have in place procedures to deal with complaints. A small number of centres do have a rudimentary complaints system and consumers do address complaints to such companies. However, the fact that approximately half of cab drivers are not affiliated and dispatch companies are small in size, limits the possibilities of reliance on companies for complaint resolution.

The State is currently involved in dealing with complaints through the PSV Inspectorate of the Garda Síochána. In Dublin, the PSV inspectorate resides in the Carriage Office, which carries out the role of enforcing the public service vehicle regulations. Elsewhere, this function is normally carried out by individual officers.

The Carriage Office receives complaints from cab users. While a telephone response is available, formal complaints are accepted in writing only, by letter and electronic mail. The Carriage Office assesses these complaints and refers them to the local Garda Station for investigation. Criminal complaints are always referred to the local Garda superintendent. Some complaints cannot be processed in this manner, as neither the badge number of the driver or the taxi licence number is supplied.

Some 600 written complaints are processed annually. The majority of these relate to alleged overcharging. A frequent complaint arises from consumers who believe that they were overcharged, as the driver did not operate the meter. In most cases, the driver was acting within the law, as the destination of the trip was outside the taximeter area. This demonstrates that consumers are not aware of the current regulations regarding taximeter areas and maximum fares. In 2004, complaints led to revocation of 28 licences arising from issues such as drink driving, and flouting of PSV regulations, including over charging.

The telephone centre within the Carriage Office is operated by at most three persons, on a 09.30–16.30 hours basis. Some 12,000 telephone calls are received annually. Queries cover a wide range of issues, including those relating to lost property, SPSV driver licence application procedures, SPSV licence application procedures, among others. The volume of calls is large in relation to the resources available, and it is apparent that many callers have to wait a considerable period or are frustrated in their attempts to make contact. The scale of the increase in cab numbers and usage following liberalisation has given rise to additional demands not matched by resources.

The delivery of a proper complaints system will require a number of elements to be put in place:

- Education of consumers in relation to the SPSV regulations through a variety of media; this would ensure that consumers have sufficient knowledge of their rights and reduce spurious complaints;
- The development of a user-friendly guide to the regulations for consumers;
- Provision of information on complaints procedures inside cabs, alongside driver and vehicle licensing information;
- The development of a user-friendly guide to the regulations for SPSV drivers;
- Making appropriate licence application forms available electronically and through dispatch centres;

- The introduction of a Customer and Driver Charter. This would be based both on the obligations and powers of both parties as set out in legislation, as well as on societal norms regarding good behaviour. It would detail customers' and drivers' rights and responsibilities, and be an integral element in driver education and training and in information dissemination to consumers;
- Requiring dispatch centres to maintain a log of complaints on issues relating to SPSV regulations and imposing an obligation to make the complainant aware of the Commission's complaints service when it is available; and ultimately,
- Development of a penalty points system for drivers who have complaints against them upheld.<sup>42</sup>

Under the Taxi Regulation Act, 2003, the Taxi Regulator will, when the relevant section is commenced, set up a user friendly and accessible complaints procedure. Given the other demands on the resources of the Garda Síochána, an efficient and effective arrangement would ensure that, at a minimum, information dissemination and preliminary assessment of complaints would be undertaken by the Taxi Regulator. However, close liaison with the Gardaí would be required to ensure that, in particular, criminal matters were recognised and dealt with. One approach could entail the secondment of some Garda officers to the Commission for Taxi Regulation. These officers would advise the Commission and liaise with the Gardaí at local level. There is a precedent for such an approach in the Office of the Director of Corporate Law Enforcement, where seven members of the Garda Síochána are seconded. The precise roles of officers of the Commission and the Gardaí, in relation to the pursuit of revocation of licences, needs to be considered further.

Significant additional resourcing will need to be devoted to an information and complaints system, which will have in place procedures to ensure that consumers throughout the country are kept informed, and have ready access to the complaints system.

<sup>42</sup> This may require further primary legislation.

## 10.11 Conclusions

The overwhelming majority of consumers rate cab services highly, with only a minority indicating that they had concerns about vehicle quality. Accordingly, it is not recommended that a standard cab be introduced, as there is no real demand, and could unnecessarily increase the costs to the trade. Likewise there is no real demand for a standard colour for cabs, and such a policy is not recommended. However, people with disability have concerns about vehicle quality and visibility, and these are subject to separate consideration in Section 11.

There is a need for better in-cab information and it is recommended that driver and vehicle licences and fare cards be displayed both in the front and rear of all taxis and hackneys. This should be accompanied by information on customer complaint procedures with summary details in a number of foreign languages. With regard to small public service vehicle driver's licensing, it is considered that the knowledge test is sufficiently rigorous and that the introduction of a practical element is not a priority. However, attendance at a training course should be obligatory. It is recommended that the renewal period for driver licensing be reduced to two years, and that professional development training be part of the renewal process.

It is recommended that rules of good conduct be established in regulations for hackney as well as taxi drivers. A code of conduct for drivers should be established within the context of a Customer and Driver Charter.

A comprehensive information and complaints system is required. This will entail among others the provision of information inside cabs. Dispatch companies should be required to maintain a log of complaints, and to pass on relevant complaints to a State run service. The Taxi Regulator should take the lead in the development and administration of a complaints system in co-operation with the Garda Síochána.

# 11

## Providing services for people with disabilities

### 11.1 Introduction

The provision of taxi services that cater for people with disabilities has been the subject of considerable debate, with government intention at one time being to ensure that all taxis are wheelchair accessible. Strong representations were made in the course of the consultation process for this report, by organisations representing people with disabilities. The main concerns raised were in relation to accessibility and affordability of services.

People with disabilities are seeking a level of service that is generally on a par with services provided to other consumers. Not all people with disabilities want services that are wheelchair accessible, as these are not always appropriate for people with ambulant disabilities who do not use wheelchairs. The aim for the future should be to have vehicles available that are not only wheelchair accessible, but also suitable for use by people with disabilities generally and other citizens. Such a vehicle is not currently available in Ireland, but in the fullness of time, it is something that the taxi and motor industries should be striving towards.

The current problems that can be addressed in the immediate future relate to:

- The inadequate number of taxis that are wheelchair accessible;
- A reluctance on the part of drivers to provide such services; and,
- Affordability of services.

Thus, action is needed both to increase the number of wheelchair accessible taxis in operation and to improve the level of services provided to people with disabilities generally.

### 11.2 Experiences abroad

Rather than imposing a requirement on all taxis to be accessible, most other European countries rely on more targeted approaches.

Some European countries have targeted the demand side by putting grants or subsidies in place to address the issues of accessibility and affordability. In London, the Taxi-Card system operates whereby eligible people pay a minimum fare with the balance subsidised by local and central government. The Nordic countries have developed Special Transport Service (STS) schemes, while in Sweden, for example, qualifying passengers pay just 10 per cent of the journey fare and local and central government pay for the balance. In Finland, people with serious mobility and sensory impairments are provided with a taxi/special transport service for all trips to school or work with an additional eighteen one way recreational trips per month. The cost to the disabled person using the service is the same as the cost of a public transport ticket.<sup>43</sup> In Norway, the STS includes the presence of Maxi Taxis. These are taxis with a maximum seating capacity of 18, that are fully equipped to provide services to people with disabilities. Maxi Taxis are the primary means of transportation for publicly subsidised trips but are

<sup>43</sup> Joint ECMT-IRU Study on Economic Aspects of Taxi Accessibility, May 2001.

Table 11.1: WAT licences in operation by taximeter area

Taximeter area	WATs	Standard taxis	WATs as % of all taxis
Cork city	50	800	5.9
Dublin city	930	8,969	9.4
Galway city	46	423	9.8
Limerick city	14	451	3.0
Waterford city	22	157	12.3
All other towns	184	1,570	10.5
<b>Total*</b>	<b>1,246</b>	<b>12,370</b>	<b>9.2</b>

\*Note: The data in the above table refers to just 31 taximeter areas.

also allowed to operate as ordinary taxis. This means that there are usually taxis available for people with disabilities when they need one, even if the trip is not a subsidised one.

The other approach taken by a number of European countries (including Austria, Denmark, Finland, Germany, the Netherlands, Portugal and Spain) is to target the supply side by allowing reductions in VAT or purchase taxes to people buying taxis. In some cases these reliefs relate to all taxis but in others they are specific to accessible taxis.<sup>44</sup> In Finland, for example, reductions are given on the purchase of any new taxi, with maximum savings of €9,587,<sup>45</sup> and taxis designed for use by disabled people are totally exempt from taxes. In Spain allowances can amount to savings of 23 per cent on the cost of a new vehicle. In Denmark, the savings allowed mean that the vehicle can be sold on after three years for about the same price as was paid for it. France also offers financial benefits but to a lesser extent. Taxi owners are exempt from the tax that would normally be paid on the resale of the vehicle. The Ile-de-France region makes subsidies available towards the capital costs of modifying a taxi to meet the needs of disabled passengers. The subsidy covers 50 per cent of the costs to a maximum of €15,245 if a taxi is fitted with a lift, or up to €3,050 if it is equipped with swivel seats.<sup>46</sup>

Telephone services or dispatch companies also play a significant role in the provision of services to people with disabilities, as they are looking for door to door services. In countries where there is a high affiliation rate, taxi companies have developed to a point where they can specifically target the accessible taxi market. Taxis can play an important role in providing public transport services that are usually carried out on a contractual basis. Such contracts would include the transportation of people with disabilities and the elderly. In a survey carried out in 2003,<sup>47</sup> the indication was that for many countries, public sector contracts can account for more than 25 per cent of taxi trips.

### 11.3 Increasing the number of wheelchair accessible taxis in Ireland

#### 11.3.1 The current fleet size

As already mentioned in Section 4.2 above, the licensing authorities for each taximeter area were contacted and asked for data on the number of licences in operation in their areas. As Table 11.1 indicates, the proportions of taxis that are wheelchair accessible are very low in most areas, with some areas having no wheelchair accessible taxis (WATs) at all. The data in Table 11.1 relates to thirty-one of a total of thirty-three taximeter areas.<sup>48</sup>

<sup>44</sup> Joint ECMT-IRU Study on Economic Aspects of Taxi Accessibility, May 2001.

<sup>45</sup> Figures quoted in 2001.

<sup>46</sup> Figures quoted in 2001.

<sup>47</sup> Bekken, J. & Longva, F., Impacts of Taxi market regulation – An International Comparison. OFT London, UK, 2003.

<sup>48</sup> Data is missing for Cobh Town Council and Letterkenny Town Council.

**Table 11.2: Capital costs of vehicles (€)**

	Second-hand standard taxi*	New WAT <sup>o</sup>
Purchase cost	13,545	33,000
Estimated resale value after three years	7,799	17,500
Actual cost to driver (excluding interest)	5,746	15,500

\*Based on a four-year-old Toyota Avensis Saloon (1.8l petrol engine). This example was selected on the basis that 83.3 per cent of drivers surveyed in the Dublin area reported buying their vehicle second-hand.

<sup>o</sup>Based on a new Fiat Scudo Combi Van (2.0l diesel engine) with conversion costs included.

The overall proportion of wheelchair accessible taxis is just 9.2 per cent of all taxis. This may be compared with a figure of 21 per cent prior to liberalisation of the market. With proportions at such low levels, the chances of a person in a wheelchair receiving a level of service that compares to services received by consumers as a whole are greatly reduced. Representative groups for people with disabilities have requested that at least 20 per cent of taxis should be wheelchair accessible to ensure a greater service provision. Even this level of provision would require other measures to ensure a level of service approaching that available to other consumers.

### 11.3.2 Issues for taxi drivers

There are a number of issues that seem to discourage taxi drivers from applying for and operating wheelchair accessible taxi licences.

Some drivers may be concerned about the extra time that it may take to assist a disabled person to get into a taxi. However, this may just be a lack of knowledge on the part of the driver. In reality, the delays involved are minimal. A study carried out by Computer Cab in the UK<sup>49</sup> indicated that on average it takes just 4.3 minutes to assist a person in a wheelchair into a taxi, and 2.8 minutes to assist a person with an ambulant disability.

Potential health and safety risks to drivers of accessible taxis when assisting a person in a wheelchair to board a taxi are another concern, as are the potential health and safety risks to the passenger if the driver does not know how to safely secure the wheelchair.

Another issue of concern for drivers is the already mentioned low proportion of wheelchair accessible taxis currently in operation. A driver operating an accessible taxi may find him/herself called upon more often to travel excessive distances to pick up people with disabilities. This causes an increased amount of empty running, for which drivers are not compensated. If the fleet of wheelchair accessible taxis were increased, so too would the probability of such a vehicle being close by, when a booking is made.

Probably the greatest barrier to drivers who would like to operate a wheelchair accessible taxi is the increased capital costs involved. Where the driver of an ordinary taxi can reduce their overhead costs by purchasing a vehicle that has already been depreciated somewhat, the driver of a wheelchair accessible taxi will usually have to invest in a new vehicle. The cost of a suitable van-type vehicle, with conversions, is roughly €33,000,<sup>50</sup> compared to a cost of €13,545<sup>51</sup> for a four-year-old saloon car. It should be noted that a four-year-old saloon car used as a taxi would have an estimated resale value after three years of €7,799,<sup>52</sup> allowing for the additional mileage done by taxis. This implies an actual cost of €5,745 plus interest. The wheelchair accessible taxi would have a resale value of roughly €17,500 after three years, implying an actual cost to the driver of €15,500 plus interest. The resale value of €17,500 is based on the assumption that there is a second-hand market for such vehicles, which is another concern of drivers.

Further to the costing model discussed in Section 8 of this report, Table 11.3 overleaf compares the differences that arise when the costs of operating a wheelchair accessible taxi are compared to those of operating an ordinary taxi. The modelling arrived at a number of basic costs that include the capital costs associated with purchasing a vehicle, insurance, road tax, NCT, radio rental, meter calibration and verification costs, taxi licence renewal costs, drivers licence renewal costs, fuel, servicing, spare parts and cleaning.

<sup>49</sup> Sourced in the Joint ECMT-IRU Study on Economic Aspects of Taxi Accessibility, May 2001.

<sup>50</sup> Based on the cost of buying and converting a new Fiat Scudo Combi with a 2.0 litre diesel engine.

<sup>51</sup> Based on the cost of buying a four-year-old Toyota Avensis Saloon with a 1.8 litre petrol engine.

<sup>52</sup> This figure is based on standard depreciation rates for cars with an additional adjustment made for the extra mileage done by taxis. The depreciation is likely to be a minimum estimate due to the fact that former taxis might command lower prices in the used car market.

**Table 11.3: Comparing incomes of drivers of WATs and drivers of ordinary taxis (€)**

	Ordinary taxi	WAT taxi
Annual fare revenue*	43,200	43,200
Less annual costs:		
Vehicle costs	2,793	7,306
Other annual standing costs	6,744	6,744
<i>Total annual standing costs</i>	<i>9,537</i>	<i>14,050</i>
Total annual running costs <sup>o</sup>	8,212	8,052
<i>Total annual operating costs</i>	<i>17,749</i>	<i>22,102</i>
<b>Income</b>	<b>25,451</b>	<b>21,098</b>

\*Based on weekly earnings of €900.

<sup>o</sup>Differences in running costs between the two vehicle types occur as a result of differing fuel costs brought about by the different engine types and sizes.

Using the examples mentioned above, a driver operating a newly purchased wheelchair accessible taxi will have a gross income that is €4,353 per annum less than the driver of a second-hand standard saloon taxi. This is without making allowance for the additional loss in revenue that might arise as a result of increased empty running.

### 11.3.3 Growing the accessible taxi fleet

International experience of increasing numbers of accessible taxis has been to follow one of two approaches. In the first instance, drivers are given grants for purchasing wheelchair accessible vehicles or vehicles that have been adapted for use by people with disabilities. In the second instance, drivers are given a remission of the purchase taxes paid on accessible or adapted vehicles. Both options would be viable in Ireland. However, an approach that focuses on remission of vehicle taxes would be preferable because:

- It would be administratively simpler; and,
- As vehicle specifications improve, remission of vehicle taxes would ensure that the monetary aid to drivers automatically reflects the vehicle purchase prices.

<sup>53</sup> Finance Act, 1989, s. 92 (excise); Finance Act, 1992, s. 134 (3) (VRT); Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations, 1994 (S.I. No. 353/94).

<sup>54</sup> Refers to VAT on the combined cost of the vehicle and its adaptation.

**Table 11.4: The potential impact of a VRT remission on incomes of WAT drivers (€)**

	WAT	WAT exempt of VRT
Annual fare revenue*	43,200	43,200
Less costs:		
Vehicle costs	7,306	4,022
Other annual standing costs	6,744	6,744
<i>Total annual standing costs</i>	<i>14,050</i>	<i>10,766</i>
Total annual running costs	8,052	8,052
<i>Total annual operating costs</i>	<i>22,102</i>	<i>18,818</i>
<b>Income</b>	<b>21,098</b>	<b>24,382</b>

\*Based on weekly earnings of €900.

In order to assess the impact that such remissions would have, the costing model used earlier in the report was used to measure the impact that tax remissions could have on the earnings of wheelchair accessible taxi drivers.

### 11.3.4 The potential impact of purchase tax remissions

There are a number of options where the remission of purchase taxes is concerned:

- Remission of the Vehicle Registration Tax (VRT) on the purchase of the vehicle;
- Remission of both the VRT and the VAT on the purchase of the vehicle; and,
- Remission of the VRT and repayment of VAT on the purchase of the vehicle and repayment of the VAT on the costs of adapting the vehicle for use as an accessible taxi.

The precedent for granting such remissions has already been set in Ireland.<sup>53</sup> People with disabilities are entitled to repayments of both VRT and VAT,<sup>54</sup> to a combined maximum of €9,525, on vehicles that have been adapted for their own private use, on the premise that they will not dispose of the

**Table 11.5: The potential impact of VRT remissions and VAT repayments on the incomes of WAT drivers (€)**

	WAT	WAT exempt of VRT	WAT exempt of VRT and VAT
Annual fare revenue*	43,200	43,200	43,200
Less costs:			
Loan (capital plus interest)	7,306	4,022	2,312
Other annual standing costs	6,744	6,744	6,744
<i>Total annual standing costs</i>	<i>14,050</i>	<i>10,766</i>	<i>9,056</i>
Total annual running costs	8,052	8,052	8,052
<i>Total annual operating costs</i>	<i>22,102</i>	<i>18,818</i>	<i>17,108</i>
<b>Income</b>	<b>21,098</b>	<b>24,382</b>	<b>26,092</b>

\*Based on weekly earnings of €900.

vehicle for a minimum of two years. Furthermore, certain organisations responsible for the transportation of people with disabilities are entitled to the same reliefs to a maximum of €15,875.

There are two broad options if similar reliefs are to be afforded to taxi drivers providing services to people with disabilities. The first option is to offer remissions of VRT only. There would have to be a proviso attached whereby the driver would be required to affiliate with a radio dispatch company.<sup>55</sup> It has already been mentioned that people with disabilities require a door to door service and so depend on radio dispatch companies for taxi services. With more accessible taxis affiliated to such companies, the delivery of services to people with disabilities will inevitably increase. It was indicated in Section 3 that just 3.5 per cent of all taxis are bought new, so exchequer losses associated with a remission of VRT would not be substantial. In fact, there is a possibility that such a policy would not result in a tax revenue loss, as new vehicles purchased would give rise to additional VAT payments.

With remissions of VRT afforded to drivers of wheelchair accessible taxis, the initial outlay for a new vehicle, including conversion costs would decrease from €33,000 to €24,750. This in turn would reduce the costs associated with financing such a vehicle. The end result would be a potential increase in driver incomes of €3,284 per annum for drivers of wheelchair accessible taxis.

Other than a simple increase in the number of wheelchair accessible taxis in operation, people with disabilities are looking for additional features that would enhance accessibility for all people with disabilities, including those with sensory disabilities. Such features include colour coding of the vehicle, brightly coloured grab handles, clearly marked seat edges, door handles and window controls, talking meters that are activated when the journey begins, and induction loops<sup>56</sup> where two-way voice intercoms are installed. All of these features cost money to install and should take account of the industry's capacity to pay for them.

A second option, therefore, would be to offer both a remission of VRT and repayments of total VAT as charged on the purchase of the vehicle and its adaptation, with the proviso that drivers would not only affiliate to a dispatch company but also install certain additional features. Remissions of VRT and repayments of VAT would increase driver incomes by €4,994, enabling the conversion of the vehicle to one that is disability friendly as opposed to one that is merely wheelchair accessible.

It should be noted that in practice, actual savings will depend on the resale value of the vehicle. The model does not take account of the potential that exists for wheelchair accessible vehicles to have reduced resale values. With an increase in the number of wheelchair accessible vehicles in the market, the used value may fall further. On the other hand, a second hand

<sup>55</sup> Where there is a dispatch company with, say, at least ten vehicles in the licensing area of the taxi concerned.

<sup>56</sup> An induction loop could also be considered as technological advances are made.

market may develop after three or four years, which in turn might mean that even greater numbers of drivers choose to operate wheelchair accessible vehicles.

It is proposed that any tax incentives afforded to wheelchair accessible taxis be similarly afforded to drivers of accessible hackney cabs. This would give rise to the need for a new licence category, Wheelchair Accessible Hackney. As hackney cabs are usually affiliated to dispatch companies by the nature of their operation, they are in a prime position to deliver door to door services to people with disabilities.

## 11.4 Improving levels of service

### 11.4.1 Market organisation

As mentioned above, a significant element of the provision of services to people with disabilities is the provision of telephone services by dispatch companies. People with disabilities generally want services that operate door to door and so will usually order taxi services by telephone. With just 50 per cent of drivers currently affiliated to dispatch companies, their ability to provide a service is somewhat reduced.

Even in a situation where all taxi drivers are affiliated to companies, if company sizes are small and consumers are unaware of the numbers of wheelchair accessible taxis on offer, it is difficult for people with disabilities to acquire the level of services that they need. Without knowing how many accessible taxis are affiliated to different companies, they do not know which companies are best placed to provide them with a service. If a company is small, their ability to provide a service is limited. Reasonable levels of service will not be attained unless the proportion of wheelchair accessible taxis in a fleet significantly exceeds the 20 per cent already mentioned in Section 11.3.1 above.

There is a need for greater transparency around the abilities of dispatch companies to serve people with disabilities. Thus, it is proposed that dispatch companies be required to provide details of the number of wheelchair accessible taxis in their fleet and that such details would be published by the Commission for Taxi Regulation. Ideally, this, combined with an increase in the numbers of wheelchair accessible taxis available, will lead to dispatch companies specialising in the delivery of services to people with disabilities, raising the quality of services significantly.

There are certain other areas that dispatch companies also need to be encouraged to address. Specifically, people with sensory disabilities often find it difficult to order taxis or hackney cabs. If dispatch companies also accepted bookings via fax, minicom, e-mail and SMS messaging, these difficulties would no longer exist.

### 11.4.2 Driver training

Section 10 of this report proposed the provision of basic training to all taxi drivers. This training would include, among other things, both disability awareness training and wheelchair handling training. Such training would give drivers a better understanding and increase their ability to give assistance to passengers when it is needed.

Disability awareness training would help drivers to communicate and interact with people with disabilities. Basic aspects of this training would show drivers good practice relating to issues like safely guiding a person with vision impairment or communicating with a person who has a hearing impairment. Some problems that can occur in communications can be rectified very simply. For example, if a driver carries paper and a pen inside his or her vehicle, he or she is better equipped to communicate with someone who has a hearing impairment.

Wheelchair handling training would reduce the potential health and safety risks that some drivers might associate with assisting a person in a wheelchair to board a taxi. It would also ensure that the driver was fully competent in the safe securing and clamping of the wheelchair, thus heightening the health and safety of the passenger. Training in wheelchair handling would also help to dispel the preconceived ideas that some drivers have about the time that it takes to assist a disabled person into a taxi.

### 11.5 Conclusions

It is clear that in addition to the improvements that are needed in terms of vehicle specification and rank infrastructure,<sup>57</sup> there are a number of other issues that need to be addressed to improve basic service provision to people with disabilities. With cabs often representing the only possible public transport option for people with disabilities; availability, accessibility and affordability of cab services are key issues of concern. Although availability is probably the most significant issue in the immediate term, a long-term approach needs to be adopted. As recommended in *Towards an Accessible Taxi Service for All*,<sup>58</sup> a preferable taxi service is not just wheelchair accessible but is an all-encompassing disability friendly service. This should be a target of the taxi industry in the long-term.

With this in mind, the following recommendations are made:

- It should be the aim of policy to expand the proportion of cabs that are wheelchair accessible significantly, and to monitor the impact on the level of services provided to people with disability;
- In order to incentivise this, a remission of VRT to drivers on new purchases of accessible vehicles is recommended, subject to them affiliating with a dispatch company;

- Government should also consider the removal of both VRT and VAT on the purchase and conversion of accessible vehicles. This could be done subject to drivers affiliating with dispatch companies and installing additional accessibility features. Such features might include:
  - A bright yellow colour coding of the vehicle;
  - Bright yellow internal grab handles;
  - Clearly marked seat edges, door handles and window controls; and,
  - A talking meter that is activated as the journey begins.<sup>59</sup>
- There should be greater transparency around the capacity of dispatch companies to deliver services to people with disabilities; and,
- There should be increased driver training in the form of both disability awareness training and wheelchair handling training.

Affordability of taxis is another significant concern of people with disabilities. There is still a need for government to address affordability of taxis for disabled passengers. This is an issue that also needs to be addressed by wider social policy initiatives.

<sup>57</sup> Technical recommendations are made by Dublin Institute of Technology in the National Review of Taxi, Hackney and Limousine Vehicle Standards that was carried out in conjunction with this report.

<sup>58</sup> *Towards an Accessible Taxi Service for All: Recommendations on how to make taxi services accessible.* Disability Federation of Ireland, Irish Wheelchair Association, National Council for the Blind of Ireland, National Training and Development Institute, Not for Profit Business Association and RehabCare, 2004.

<sup>59</sup> Induction loops could also be considered as technological advances are made.

## 12

Streamlining fares  
and fare setting

## 12.1 Introduction

This section of the report considers three issues:

- Whether maximum fare control should continue to apply to taxis;
- The scope for uniform fare structures and fare levels across taximeter areas; and,
- The procedures that should be adopted for adjusting fare levels.

## 12.2 Maximum fares

## 12.2.1 Taxis

Currently, maximum fares are applied to taxis but not to hackneys in Ireland. Maximum fares are normally applied to taxis on the basis that the market exhibits elements of market failure. Market failure arises in the taxi trade for a number of reasons:

- A Consumers suffer from a lack of price information. For example, in the absence of fare control, they would often not be aware whether the fare quoted is fair and reasonable;
- B Consumers face considerable transaction costs in exercising choice. For example, the stopping of taxis on street in order to seek an economical fare would be time consuming, and consumers with urgent travel needs could not afford to undertake this practice;
- C If, nevertheless, consumers were to engage in this practice, it would give rise to increased congestion for other road users, as stopping taxis would hinder the flow of traffic;
- D Taxi drivers could collude to maintain high prices, especially at ranks;
- E If consumers were to shop for low fares at ranks, it could give rise to public disorder; and,

- F Tourists would be at a particular disadvantage as they have little knowledge of the local environs, and would not be in a position to assess whether the proposed fare is reasonable.

Because of the above reasons, state intervention to determine maximum taxi fares is justified and is a widespread practice throughout the developed world. However, in Sweden and in certain areas in Norway, taxi fares are not controlled. This raises the question as to whether maximum fare control in Ireland could be dispensed with.

The position in Sweden merits careful consideration, as it is the only country in Europe with complete fare liberalisation. While the level of fares is not controlled in Sweden, there are strict rules governing the information on fares. Since the market was liberalised, a number of issues have arisen:

- Overcharging compared to advertised fares;
- Unintelligible information on fares: the fare information provided is so complicated that the passengers feel they have been overcharged; Swedish courts have deemed this as overcharging as well; and,
- Drivers gaining extra revenue by not choosing the best route.

With regard to fare information and charging practice, the following systems operate in Sweden:

- Taxi companies must set uniform fares for all taxis, even though customers may negotiate fares. These requirements apply to all individual taxis affiliated to a dispatch centre and to independent drivers;
- All fares that are to be applied to the general public have to be registered with the authorities;
- All taxis are required to have readily visible fare information inside the vehicle as well as outside the vehicle on both sides;
- Taximeters are operated and must reflect the advertised fare; and,
- The basis on which fares are set cannot be adjusted after the trip has started.

It is obvious that the authorities in Sweden have introduced these measures to counteract the possibility of market failure and consequent exploitation of the consumer. The problems that arise from uncontrolled fares and the enforcement of these regulations in this regard is eased by the fact that:

- There is a high level of affiliation to dispatch centres, amounting to 90 per cent in Stockholm and 95 per cent for the country as a whole; and,
- The on-street market is generally only 20 to 30 per cent of the total market.

The Irish situation is very different, with only a 50 per cent affiliation rate in urban areas and an on-street market of almost 50 per cent in major urban areas. Accordingly, it is considered that the Swedish model would not transfer to the Irish situation and that maximum fare control for taxis be retained.

### 12.2.2 Fares for journeys outside taximeter areas

Journeys outside taximeter areas are not fare controlled. It is the practice of taxi representative bodies to disseminate fare cards with recommended fares for such journeys. These would often be used at airports where disembarking passengers want to make lengthy onward journeys by road. These fare cards have no status. There are obvious dangers in this regard in that unsuspecting consumers, and especially foreign tourists, might believe that they are officially mandated.

Apart from these issues, there is a concern that the dissemination of these cards could be construed as price fixing.

The very existence of the fare cards suggests that there is a need to control fares outside taximeter areas. This would simplify matters for consumers who place a value on the assurance that they are not being overcharged. Accordingly, it is recommended that maximum fare control be extended to all taxi journeys.<sup>60</sup> This will require the introduction of a graduated fare structure, with higher per kilometre charges for longer distances to compensate for empty running on return journeys.

### 12.2.3 Hackneys

With regard to hackney fares, the need to set maximum fares is less evident. Hackneys are normally hired by telephone, which offers greater opportunity for consumers to obtain price information and shop around. As hackneys are not hired on-street or at ranks, the negative impacts outlined at (C), (D) and (E) in Section 12.2.1 above do not occur. Moreover, because hackneys are in competition with taxis, their capacity to increase fares is limited by the fact that if they increased fares significantly above taxi fares, they would lose business.

Additionally, it has been recommended in Section 9 that hackneys be retained as a separate licence category partly to encourage price competition and bargaining. The imposition of maximum fare control on hackneys would remove a major *raison d'être* for their existence.

## 12.3 Streamlining fares

### 12.3.1 Introduction

This section of the report examines the scope for standardising maximum fare structures across the country. This is an important issue as a standardised fare structure will improve the transparency of fares for the consumer and ease the process of creating awareness of fare changes. It would also mean that adjustments to fare levels across the country could be accomplished at one time.

<sup>60</sup> A national maximum fare exists in Netherlands and in Norway outside urban areas.

### 12.3.2 Scope for standardisation

Standardisation of fare structures and levels could be taken in two steps:

- Standardising the fare structure itself, so that it contains the same elements, such as minimum fares, charges for additional passengers and so on; and,
- Applying the same rates to these elements.

The analysis in Section 7 indicated that there was a broad similarity in fare structures across the country in terms of the elements. Increased standardisation could be achieved by:

- Abolition of the additional charges for extra stops where it occurs and replacement by a charge for additional passengers;
- Uniformly applying charges for extras, such as those for luggage;
- Introduction of a telephone booking charge, where it does not currently apply; and,
- Application of standard days, a standard time period and hiring charges for unsocial hours in all areas.

Table 7.2 ranked 23 Irish taximeter areas according to the cost of a trip for a lone passenger, over a variety of distances, and during both daytime and unsocial hours. In all of the larger cities and most towns, the costs of such journeys are typically within 10 per cent of the average for the whole country. Also, these cities have virtually identical fare structures. A standardisation of fare structures and levels is, therefore, very feasible for this group.

Despite the diversity in some of the rates applying to individual elements of the fare structure, the actual fare imposed is, for a range of trips, already clustered around the average for most areas. This suggests that there is scope to standardise the absolute value of different fare elements. Moreover, the fact that broadly similar fare levels exist across a range of towns and cities, indicates that the economics of operation of taxis may not differ significantly. Towns differ from major urban areas in two principal aspects viz. the minimum charge is usually higher and unsocial hours are compensated by a minimum charge rather than a mileage-thereafter charge. While towns would suffer a reduction in the minimum fare on

standardisation, this would be compensated by the application of extras and phone booking charges. There is evidence from the case studies conducted for this study, that there is a large degree of overlap between the potential earnings in major cities and smaller towns, in that substantial weekly incomes can be earned in the towns, if weekend night working is undertaken. Moreover, there is also the reality that drivers in towns have lower earnings expectations, and are faced with a smaller market, that makes raising fares more difficult.

As taxi fares are maximum fares, if the standardised fare is set too high for consumers in a particular area, competition from hackneys will drive actual fares downward. Thus, the real risk is that standardised fares might be set too low to ensure an adequate supply of taxis. In light of the fare structures in place, perhaps the only major differential required in fare levels would be that towns require a higher minimum fare to allow for the fact that most journeys are very short.

### 12.3.3 Standardising fares

It is proposed, therefore, that a standardised fare structure be introduced, which could be largely based on the Dublin fare structure, with the inclusion of a social hours hiring charge.

These changes could be implemented in the context of a fare review so as to minimise negative impacts. The consultants have examined the feasibility of this standardisation process using a number of sample fare cards. The results indicate that it is possible to achieve standardisation without negative impacts on the economics of operation in the various taximeter areas.

However, towns, such as Longford, Drogheda and Ennis, which have very high charges at present, could mark time until the standard charges come up to their levels. Towns that have very low charges, such as Tipperary town, Ballina, and Dungarvan could adjust to the higher fares over a number of fare increases, if desired. All other towns could adjust to the standard fare immediately.

## 12.4 Adjustment of fares

### 12.4.1 Introduction

Once standardised fare structures are in place, there will be a need to adjust these from time to time. This sub-section of the report discusses the criteria that should be applied in making these adjustments and the frequency at which these adjustments should be made.

### 12.4.2 Criteria for fares adjustments

Table 8.4 in Section 8 of the report set out the revenue and cost position of the typical taxi driver. Drivers generate fare revenues and incur costs associated with taxi operation. The difference between the two elements is their gross income. Taxi representative bodies will usually apply for fare increases either to compensate for costs or to maintain or increase incomes.

From the viewpoint of economic theory, it is often argued that the justification for a fare increase should be based on the balance between demand and supply in the market. If, for example, there is evidence that supply of taxis is more than adequate to meet demand, then a fares increase would not be justified, as there would be no need to stimulate supply. The existence of taxi vehicle queues and absence of passenger queues is often proposed as an indicator that supply is adequate. If this approach were to be adopted, then taxi fares would not necessarily compensate for cost increases or rise in line with wage rates in the economy as a whole.

Such an approach could have serious consequences, if carried forward over a number of years. A situation could arise in which the level of incomes to be derived from the industry could fall, with entrants to the industry comprising those whose reservation wage is low. This could result in a fall in the number of experienced and skilled drivers, with consequent difficulties for dispatch companies in terms of servicing markets that require high standards, or in terms of making use of advanced cab technology.

Accordingly, the approach to fare adjustment recommended is one that takes account of changes in costs facing the industry and reflects changes in earnings in the economy as a whole, but incentivises the owner-driver and the trade as a whole to reduce cost and increase productivity. The proposed approach is as follows:

- Compilation of an index to reflect costs;
- These costs to be defined to include both annual outlays of taxi drivers and their annual income (after costs) from the trade;
- The weights of each element of cost to be established;
- Changes in the cost index to be measured by the change in outlay prices (fuel and so on) and changes in average industrial earnings<sup>61</sup> to reflect drivers' incomes;
- Weighting of cost elements to arrive at overall index value;
- Comparison of index value with the value obtaining at the time of the last fare increase to determine percentage change in costs;
- The fare level to be determined by the percentage change in costs plus or minus X per cent for each intervening year since the last fare change; and,
- The X percentage factor to be set by the Taxi Regulator from time to time.

This process is akin to the price adjustment process in many regulated industries. It has a number of advantages:

- It takes account of changes in costs affecting taxi drivers;
- It reflects changes in average earnings in the economy, so that taxi drivers incomes will not fall significantly behind in relative terms;
- It both encourages the industry to innovate and introduce cost savings; and
- It allows the Taxi Regulator discretion to adjust fares to take account of market conditions.

The weights for the cost index are readily identifiable from the data presented in Section 8. Given the nature of the taxi industry, the opportunities for cost saving are probably limited in the short term. Accordingly, it is suggested that the X factor be set at a low rate of not more than minus 1 per cent to begin with.

<sup>61</sup> Average hourly earnings (all workers)

### 12.4.3 Timing of fare adjustments

There are strong reasons for adjusting fares at reasonably lengthy intervals:

- The persistence of fare levels for periods of time would facilitate greater knowledge of fare structures and levels on the part of the consumer;
- It would avoid imposing additional costs on taxi drivers in having their meters adjusted and tested;
- As it is envisaged that in future fare adjustments would be advertised to the consumer in a more comprehensive manner, the costs of so doing would be kept in check;
- The taximeter has limitations with regard to the incorporation of extra charges. Less frequent fare adjustments would result in larger fare increases, which would allow greater flexibility in changes in the elements of the fare structure;
- It would reduce the workload of the Legal Metrology Service; and,
- It would allow consumer-friendly presentations of the fare card to be implemented.

It is proposed, therefore, that fare reviews take place at two-yearly intervals. In exceptional circumstances the Taxi Regulator could implement a fare review at his discretion.

More fundamental reviews of the fare structures and levels would take place from time to time.

### 12.5 Conclusions

Maximum fare control should be retained for taxis and be extended to cover all journeys. A graduated fare structure should be introduced. Hackney fares should continue to be unregulated.

There is scope for standardisation of fare structures across taximeter areas. It is proposed that a standardised fare structure be introduced, which could be largely based on the Dublin fare structure, with the inclusion of a social hours hiring charge.

These changes could be implemented in the context of a fare review so as to minimise negative impacts. The consultants have examined the feasibility of this standardisation process using a number of sample fare cards. The results indicate that it is possible to achieve standardisation without negative impacts on the economics of operation in the various taximeter areas.

Adjustments of fare levels should be based on a cost index that is reflective of the outlays of drivers and earnings in the economy as a whole. The fare level should be determined by the percentage change in costs, as measured by the index, plus or minus X per cent for each intervening year since the last fare change. The X percentage factor would be set by the Taxi Regulator from time to time.

Fare adjustments should take place at two-yearly intervals. In exceptional circumstances the Taxi Regulator could implement a fare review at his discretion.

More fundamental reviews of the fare structures and levels would take place from time to time.

# 13

## Improving administrative systems

### 13.1 Introduction

This section of the report describes current administrative structures, assesses the scope for their streamlining, and considers the basis on which licence fee rates should be set.

### 13.2 The current procedure for cab licensing

#### 13.2.1 Application for a new licence

Current procedures for licensing cabs are laid down in broad measure in legislation. While local authorities may differ slightly in the administration of licensing, the general approach is as set out below, which is based on the procedures adopted by Dublin City Council.

The procedure for applying for a new taxi, wheelchair accessible taxi, hackney or limousine licence involves the applicant completing an application form and submitting it to Dublin City Council together with the appropriate fee, the vehicle licensing certificate or registration book, a tax clearance certificate and a photo of the applicant. The fees are as set out in Table 13.1.

A conditional offer will be made to an applicant who provides Dublin City Council with a completed application form and a correct payment amount.

When the applicant receives a conditional offer, they must then arrange to have their car tested by the National Car Test Service. Prior to having the car tested, applicants of taxi and wheelchair accessible taxi licences must have a taximeter installed and a taxi sign affixed to their vehicle. Having installed the taximeter in their vehicle, the applicant must make an appointment with the Legal Metrology Service to have the taximeter verified. There are seven Regional Verification Centres staffed by inspectors located in Dublin, Cork, Galway, Limerick, Waterford, Sligo and Dundalk. Arrangements between Local Authorities and the Legal Metrology Service facilitate the verification of vehicles by inspectors in areas outside the regional centres, as Local Authorities work with the Legal Metrology Service to select suitable road areas where verification can take place.

After the NCT, the applicant must forward a NCT Certificate of Suitability, a NCT Certificate outlining the vehicle's road worthiness and a current insurance certificate covering the use of the vehicle as a taxi.

Table 13.1: Licence fees for cabs (€)

Type of licence	New licence	Renewal of licence	Change of ownership
Taxi	6,300	125	125
Wheelchair accessible taxi	125	125	125
Hackney	250	125	125
Limousine	250	125	125

On receipt of all the above listed documents a licence will be issued to the applicant. The licence will list the licence number, the name of the licence holder, the Vehicle Registration Number and the start and end dates of the licence.

### 13.2.2 Licence renewal

Approximately 6 to 8 weeks prior to the lapse of the licence, Dublin City Council sends out a reminder of renewal letter to the licence holder.<sup>62</sup> The letter outlines the documents necessary to renew the licence.

If the licence holder is renewing their licence on the same vehicle they must provide a NCT Certificate outlining the vehicle's road worthiness, an insurance certificate covering the use of the vehicle as a taxi and a Tax Clearance Certificate, together with the renewal fee.

If the applicant is renewing their licence on a different vehicle, in addition to the above, they must also provide a Certificate of Suitability from the NCT and a Vehicle Licensing Certificate/ Registration Book.

The application for renewal must be received by the licensing authority not later than two months following the date of expiry of the licence.

### 13.2.3 Change of ownership during the year

A licence holder who changes their vehicle during the course of the year must provide Dublin City Council with a fee payment of €125, together with a NCT Certificate outlining the vehicle's road worthiness, a NCT Certificate of Suitability, an Insurance Certificate covering the use of the vehicle as a taxi, a Vehicle Licensing Certificate/ Registration Book and a Tax Clearance Certificate.

## 13.3 Application for and renewal of a Small Public Service Vehicle driver's licence

The Commissioner of An Garda Síochána, under the Road Traffic (Public Service Vehicle) Regulations 1963, is responsible for the issue of small public service vehicle driver licences. The Commissioner devolves his power to authorised officers, viz. a chief superintendent or superintendent.

The established procedure for applicants of a small public service vehicle driver's licence is to fill out a 'PSV 15' form at the applicants local Garda station. Together with a completed 'PSV 15' form, the applicant must provide the Garda with proof of a full EU driver's licence, a receipt (for €12) from the motor taxation office, three photographs (3x4 inches), a valid Tax Clearance Certificate and the names of two referees.

On receipt of an application, the local Gardaí carry out checks on the applicant's character and criminal record. The local superintendent will then make recommendations on the suitability of the applicant, after which the application is forwarded to the authorised officer who processes it.

If the applicant is deemed eligible he or she is then informed, via a letter, and will be given a date when they must attend the Carriage Office to sit written SPSV driver's test. The test consists of a one-hour written examination, testing the applicant's knowledge of:

- The rules of the road and traffic regulations;
- SPSV regulations; and,
- The Dublin Taximeter area.

Subject to passing the test, the applicant is required to pay €3 to the local motor tax office and present the receipt at the Carriage Office, where he or she will be issued with a five-year SPSV licence and badge.

## 13.4 The role of the Legal Metrology Service

The Legal Metrology Service is a statutory body, established by the Metrology Acts 1980–1998, within the National Standards Authority of Ireland. The Legal Metrology Service has the role of type approving taximeters, verifying that they are operating correctly and inspecting them in use.

When a taximeter is initially fitted or after it has been repaired, adjusted or transferred to another vehicle, its owner must request that an inspector verify that it is operating correctly. When verifying a taximeter the inspector tests that the installed instrument measures distance and time accurately so that the correct amount is calculated and shown for payment on the display. The receipt printer is also checked.

<sup>62</sup> Not all local authorities perform this function.

Taximeters that pass the required test are sealed by the inspector. This normally takes the form of a lead disc, which is embossed with the inspector's identification number and the year the seal is applied.

The taxi owner is obliged to have the taximeter verified when first installed and thereafter each time the seal is broken either for repair or when a new fare is programmed.

One of the main functions of the Service is inspection, which means that an inspector can inspect a taximeter in use at any time. Sometimes this is by arrangement with the taxi owner while at other times it may be a spot check at taxi ranks, or following up a complaint by a member of the public. If necessary the driver can be instructed to bring the vehicle to an appropriate location for testing.

Since the taxi market was liberalised, the workload on the Legal Metrology Service has increased substantially, due to the increase in taxi numbers. A particular problem occurs when fares are changed. This is because all meters have to be reprogrammed, which leads to the breaking of the seal and then reverification by the Service. This can result in a large volume of work within a short period of time. The differing methods used by local authorities in setting individual fare cards, which must be agreed by the Legal Metrology Service, also creates significant workloads for the Service.

In order to use the Service's resources efficiently, it is desirable that adequate notice of a fare change be given, so that programming and verification can take place over a period of time. Also, frequent fare changes are wasteful of the Service's resources and have cost implications for drivers, so fare adjustments should be postponed until significant changes are justified, (see Section 12).

Taxi drivers have complained about the delays arising from taximeter verification. The Service is currently exploring options on how to respond to the increased demand.

### 13.5 The National Car Testing Service

The National Car Testing Service (NCTS) is a private sector company responsible for the implementation and operation of the car testing service in Ireland. The National Car Test (NCT) is conducted at 43 purpose built NCT Centres nation-wide. In 2000, responsibility for the suitability and safety testing of small public service vehicles was given to NCTS. Suitability testing occurs when vehicles are entering service as small public service vehicles for the first time. It extends to inspection of meter and roof sign installation. Additionally, a standard vehicle test is carried out annually on all existing small public service vehicles. A more complete account of the NCTS role and an evaluation of its procedures are contained in the accompanying Dublin Institute of Technology Report.

### 13.6 The scope for a more streamlined and cohesive administrative system

The current administrative arrangements for cab licensing cause a degree of frustration to cab drivers. With regard to first-time licensing, after completing the application form and paying appropriate fees, the applicant must, if the application is for a taxi licence have the taximeter and roof sign fitted, and then have the meter verified by the Legal Metrology Services. The vehicle must then be subject to suitability and safety testing by the NCT before returning to the local authority to obtain the licence. The bodies representing taxi drivers, in particular, have suggested that, at a minimum, meter verification and suitability and safety testing could be undertaken by a single body, thus saving time and resources. A more radical reform could see cab licensing also being assigned to this body, with scope for further resource and time savings. With regard to renewal of hackney and limousine licences, a similar process takes place. Delays arising from the renewal process impact on cab drivers in terms of loss of earnings while their vehicle is off the road.

The fact that licensing, meter verification and vehicle testing is undertaken by three separate bodies also results in difficulties in enforcement. For example, it is possible for applicants to obtain meters and roof signs, but decide not to pursue the application, raising the possibility they could be used in non-licensed vehicles. Similarly, the Legal Metrology Service, in verifying meters, is not required to check whether the meter is installed in a licensed vehicle. A one-stop-shop approach would ensure that these types of events were controlled. It would also facilitate the development of a centralised and comprehensive vehicle database, further enhancing enforcement.

The Commission, under the Taxi Regulation Act, 2003, when commenced, will have powers to determine who is entitled to grant licences. While meter verification is the responsibility of the Legal Metrology Service, it should be possible for the Department of Transport, the Legal Metrology Service and the Commission to jointly procure the licensing, vehicle testing and meter verification services, subject to audit by these bodies. It is recommended that the Commission explores this possibility as and when the opportunity arises.

Under the same Act, the Commission will have powers to make arrangements for the granting of cab driver's licences. At present, the Garda Síochána perform this function, which includes the testing of the applicant and the assessment of whether he or she is a fit and proper person. In Section 10 it was recommended that drivers should be required to undergo training prior to obtaining a SPSV driver's licence. This will require a more comprehensive written test to be put in place. Consideration should be given to procuring the issuing of the licence and the testing of applicants from an external provider, with the 'fit and proper person' assessment continuing to be a function of the Garda Síochána. This would free up Garda resources to deal with enforcement of the legislation.

With regard to enforcement of the legislation, there is a clear need for additional resources to be applied, particularly outside the major urban areas. An option in this regard is for the Commission to establish an inspectorate to pursue summary offences.

### 13.7 Setting Small Public Service Vehicle licence and driver licence fees

The adequacy of vehicle and driver licence fees will require further consideration, when the Commission takes on its full functions. The Taxi Regulation Act indicates that income from these shall be applied for meeting the expenses of the Commission and the costs of supporting the provision of infrastructure for cabs.

With regard to the structure of such fees, a sound principle would be to make them as cost-reflective as far as is possible, with deviations from this principle only for the purpose of achieving clear social objectives, that could not be better achieved by other means.

In this context, it is clear that the level at which driver licence fees are set is insufficient to cover the costs involved, and in the case of renewal fees is an incentive to nuisance renewals. They will need to be raised.

More importantly, perusal of the vehicle licence fees set out in Table 13.1 above indicates how anomalous the first time fee for taxi licences is. At €6,300 the fee could operate as a barrier to entry to the market. It is also unclear, if taxi licences are to exceed those for hackneys, why the emphasis should be on first time rather than renewal fees. Reliance on the latter would be more cost-reflective. Accordingly, it is recommended that the first time fee for a taxi licence be reduced in the context of a re-balancing of fees away from first-time fees towards renewal fees.

This re-balancing will ease entry to the taxi market for drivers. This will help ensure that peak demand for services continues to be met and that the illegal operation of hackneys in taximeter areas outside the major cities is diminished.

### 13.8 Monitoring and information needs

In order to enhance control and enforcement measures, it is vital that centralised SPSV and Driver licence databases be developed. These will be a valuable source of data for the Commission on market developments. Prior to this, the licensing authorities should be required to furnish the Commission with data on vehicle licence renewals and non-renewals on a regular basis, together with an annual estimate of the stock of valid licences and the characteristics of the vehicles to which they apply.

During the course of this study, a number of measures of the quantity and perceived quality of cab services were obtained on foot of surveys. Some such measures are now available for the Dublin taximeter area for a number of years, allowing trends to be assessed. It is recommended that the Commission undertake similar surveys to provide updates of these performance indicators at regular intervals, which can now be done on a national basis.

### 13.9 Conclusions

In order to use the Legal Metrology Service's resources efficiently, it is desirable that adequate notice of a fare change be given, so that programming and verification can take place over a period of time. Also, frequent fare changes are wasteful of the Service's resources, therefore fare adjustments should be postponed until significant fare changes are justified.

A one-stop-shop approach to the licensing, meter verification, and testing of vehicles should be considered. It is recommended that the Commission explores this possibility for joint procurement of these services with the Department of Transport and the Legal Metrology Service, as and when the opportunity arises.

With regard to SPSV driver's licences, consideration should be given to procuring the issuing of the licence and the testing of applicants from an external provider, with the 'fit and proper person' assessment continuing to be a function of the Garda Síochána.

The adequacy of vehicle and driver licence fees will require further consideration, when the Commission takes on its full functions. It is clear that driver licence fees are insufficient to cover the costs involved, and will need to be raised.

At €6,300 the first time taxi licence fee may operate as a barrier to entry to the market. It is recommended it be reduced in the context of a re-balancing of fees away from first-time fees towards renewal fees.

## 14

Conclusions and  
recommendations

### 14.1 Conclusions

Since the liberalisation of the taxi market in 2000, there has been a rapid increase in the number of cabs, particularly in the number of taxis, which more than trebled between 2000 and 2004.

The study shows that this increase in the number of vehicles has raised levels of service to consumers across the board in terms of general availability and reduced waiting times. For example, in 1997 in Dublin, over 40 per cent of taxi trips incurred waiting times for the consumer of more than 10 minutes. This proportion has reduced to just 26 per cent. The proportion of trips that incur waiting times of less than 5 minutes has increased from 23.0 per cent in 1997 to 40.2 per cent in 2005.

This increase in service was not only achieved by the increase in vehicle numbers but also by the emergence of part-time operators who now find it economically viable to operate on this basis and enter the market at peak times to help to meet demand.

This increase in service in terms of availability of cabs, has not to date been at the expense of a reduction in the quality of service delivery. The majority of consumers are quite satisfied with the overall level of service provided, as well as with vehicle quality, vehicle cleanliness and the helpfulness of drivers. Over 58 per cent of consumers believe that cabs offer good value for money.

Against this background of progress, there remain a number of issues that need to be addressed to maintain and improve cab services:

- While consumers in general are satisfied with the quantity and quality of services, services continue to be inadequate for people with disabilities;
- The complaints systems that are currently in place are inadequate and consumers are often unaware of complaint procedures;
- Certain towns of significant size have not declared taximeter areas, with the result that maximum fare control does not operate;
- Where taximeter areas have been declared, they are often poorly designed, covering very small geographical areas with the result that the bulk of trips are not on the meter or subject to maximum fare regulation;
- Enforcement of the legislation in general needs to be improved, including enforcement of the operation of hackneys outside major urban areas in particular;

- Consumers are faced with a relatively complex fare structure, which differs from one taximeter area to another. The fact that maximum fares operate only within taximeter areas is confusing to the customer;
- Although precise data on earnings is difficult to estimate, the indication is that average earnings for taxi drivers have fallen since market liberalisation. The estimated average income of taxi drivers is just over €25,000, based on a 54-hour working week. This implies that taxi drivers earn a significantly lower hourly income than people working in industry in general;
- Consumers are often not fully aware of their rights and cab drivers of their obligations in relation to taxi and hackney services; and,
- Taxi and hackney vehicle and driver licensing systems are somewhat fragmented at present and measures to streamline the process of vehicle and driver licence application should be considered.
- A comprehensive information and complaints system is required. It is recommended that dispatch companies be required to maintain a log of complaints for inspection by the Commission. It is also recommended that the Commission take the lead in the development and administration of a complaints system in co-operation with the Garda Síochána. A penalty points system should be developed for drivers who have complaints against them upheld;<sup>63</sup>
- It is recommended that a Customer and Driver Charter be introduced. This would be based both on the obligations and rights of both consumers and drivers as set out in legislation, as well as on societal norms regarding good behaviour. It would detail customers' and drivers' rights and responsibilities, and be an integral element in driver education and training and in the dissemination of information to consumers;
- It should be the aim of policy to expand the proportion of cabs that are wheelchair accessible significantly, and to monitor the impact on the level of services provided to people with disability;

## 14.2 Recommendations

With these issues in mind, a number of recommendations are made:

- Better education of taxi and hackney users in relation to their rights as consumers and the legal code applying to taxi and hackney services is necessary. Consumers would also benefit from the development of a user-friendly guide to the regulations;
- There is a need for better in-cab information. It is recommended that driver, vehicle license details and fare cards be displayed both in the front and rear of all taxis and hackneys and that this be accompanied by information on customer complaint procedures with summary details in a number of foreign languages;
- In order to incentivise this, it is recommended that the Government should give a remission of VRT on new purchases of wheelchair accessible vehicles subject to their drivers affiliating to a dispatch company;
- Government should also consider the removal of VAT on the purchase and conversion of accessible vehicles. This would be done subject to drivers affiliating with dispatch companies and installing additional accessibility features. Such features might include:
  - A bright yellow colour coding of the vehicle;
  - Bright yellow internal grab handles;
  - Clearly marked seat edges, door handles and window controls; and,
  - A talking meter that is activated as the journey begins;

<sup>63</sup> This may require further primary legislation.

- Access for the public to information on the number of wheelchair accessible taxis that are affiliated to individual dispatch companies would give greater transparency concerning the capacity of dispatch companies to deliver services to people with disabilities;
- It is recommended that the dual system of taxi and hackney licensing is retained in the short term, and the issue reconsidered again when other reforms such as consumer education, greater controls and re-balancing of licence acquisition and licence renewal charges have been implemented;
- Taximeter areas should be extended to cover towns with significant populations, and to ensure that the geographic boundaries of taximeter areas reflect the settlement pattern;
- It is recommended that two options be considered in this regard:
  - A town-based approach whereby all towns above a certain size, say 7,000 population, have a taximeter area of, say, 15 kilometre radius, with Dublin having an area of approximately 30 kilometres; or,
  - A county-based approach in which each county becomes a taximeter area, with the four local authorities in Dublin continuing to operate a joint taximeter area;
- These changes to taximeter areas would reduce the potential for the illegal operation of hackneys in certain towns. However, greater resources should also be applied to enforcement of the SPSV regulations;
- Access to bus lanes and Quality Bus Corridors should be extended to hackneys and limousines;
- The same fare structure and fare levels should apply in all taximeter areas;
- A tiered fare structure is recommended that compensates drivers for long-distance journeys and allows all journeys to be made on the meter. This will extend the operation of maximum fare control beyond taximeter areas;
- Taxi fares should normally be reviewed every two years and reflect changes in the cost of taxi operation and the need for productivity improvements;
- Hackney fares should continue to be unregulated;
- With regard to small public service vehicle driver's licensing, it is considered that the knowledge test as set in Dublin is sufficiently rigorous and that the introduction of a practical element is not a priority. However, attendance at a training course should be obligatory. It is recommended that the renewal period for driver licensing be reduced to two years, and that professional development training be part of the renewal process;
- The adequacy of vehicle and driver licence fees will require further consideration, when the Commission takes on its full functions. It is clear that driver licence fees are insufficient to cover the costs involved, and will need to be raised;
- At €6,300, the first time taxi licence fee may operate as a barrier to entry to the market. It is recommended it be reduced in the context of a re-balancing of fees away from first-time fees towards renewal fees;

- With regard to small public service vehicle driver licences, consideration should be given to procuring the issuing of the licence and the testing of applicants from an external provider, with the ‘fit and proper person’ assessment continuing to be a function of the Garda Síochána;
- A one-stop-shop approach to the licensing, meter verification, and testing of vehicles should be considered. It is recommended that the Commission for Taxi Regulation explore the possibility for joint procurement of these services with the Department of Transport and the Legal Metrology Service, as and when the opportunity arises; and,
- It is not recommended that a standard cab be introduced, as there is no real demand for this, and it could unnecessarily increase the costs to the trade. Likewise, there is no real demand for a standard colour for cabs, and such a policy is not recommended.

# Appendices

## Appendix A Advisory Council to the Commission for Taxi Regulation

The Advisory Council to the Commission for Taxi Regulation was established under the Taxi Regulation Act 2003 with effect from 4 November 2003.<sup>64</sup>

The primary role of the Advisory Council is to advise the Commission for Taxi Regulation and the Minister for Transport, as appropriate, in relation to issues relevant to small public service vehicles and their drivers.

The Council consists of a chairperson and 17 ordinary members, appointed for a three year period, representing the taxi, hackney and limousine industry, local authorities, An Garda Síochána, consumer, disability, tourism and business interests and other relevant sectors, as required under the Act. Nominations from a range of interests were considered by the Minister for Transport when deciding on the Council's membership.

## Members of the Advisory Council to the Commission for Taxi Regulation

Mr Pat Byrne, *former Garda Commissioner*  
(Chairperson)

Chief Supt. John Farrelly, *An Garda Síochána*

Ms. Noreen Mackey, *Competition Authority*

Ms. Sadie Doherty, *Consumer and  
Community Interests*

Mr. Jerry Brennan, *SIPTU*

Mr. John Ussher, *Irish Taxi Drivers Federation*

Ms. Deirdre Power, *Irish Hotels Federation*

Mr. Douglas Jordan, *Fáilte Ireland*

Mr. Michael Kilcoyne, *Consumers Association  
of Ireland*

Mr. Vincent Kearns, *National Taxi Drivers' Union*

Mr. Derek Dalrymple, *Taxi Company  
Owners Association*

Mr. Tom Fannin, *National Chauffeur  
Drive Association*

Mr. Brian Killeen, *Transport Logistics*

Ms. Mary Keogh, *National Disability Authority*

Mr. Vincent Thornton, *Irish Motor Industry*

Ms. Lucy O'Donoghue, *Chambers of  
Commerce Ireland*

Mr. Christopher Humphrey, *National Private  
Hire & Taxi Association*

Mr. Joe Gavin, *County and City Managers  
Association*

<sup>64</sup> Taxi Regulation Act 2003  
(Part 4) (Appointment Day)  
Order 2003 (S.I. No. 517  
of 2003).

## Appendix B

### List of consultation meetings

The following key stakeholders and interested parties and bodies were consulted on a face-to-face basis for the purposes of the study.

Accessible Taxi Group<sup>65</sup>

Advisory Council to the Commission for Taxi Regulation

An Garda Síochána

Competition Authority

Department of Transport

Dublin Airport Authority

European Taxi Group Ireland

International Road Transport Union

Irish Taxi Drivers Federation

Irish Wheelchair Association

Legal Metrology Service

National Car Testing Service

National Chauffeur Drive Association (Ireland)

National Disability Authority

National Private Hire and Taxi Association

National Taxi Drivers Union

SIPTU

Taxi Company Owners Association

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<sup>65</sup> Disability Federation of Ireland, Irish Wheelchair Association, National Association for Deaf People, National Council for the Blind of Ireland and The Not for Profit Business Association.

## Glossary

**Cab** An alternative term for a SPSV (see below) covering taxis, wheelchair accessible taxis, hackneys and limousines.

**Dispatch company** A company which takes telephone bookings for cabs and arranges with affiliated cab drivers to collect the booking passenger(s), sometimes referred to as a radio company.

**Fare card** A card which sets out how the fare in the relevant taximeter area is calculated. Fare cards must be displayed in all taxis.

**GPS** Global Positioning System

**Hackney** A SPSV which is used for private hire only and is not subject to fare control.

**NCT** National Car Test

**NCTS** National Car Testing Service

**Public hire** Public hire refers to the hire of a taxi or wheelchair accessible taxi in a public place, either at an appointed stand or on street.

**Private hire** Private hire refers to the hire of a vehicle other than a taxi i.e. a hackney or limousine. A hackney or limousine should be hired on a private hire basis by phone, but cannot be hailed down or ply for trade in a public place.

### **Small public service vehicles (SPSVs)**

vehicles with seating for up to eight passengers. These fall into the categories of taxi, wheelchair accessible taxi, hackney or limousine.

**Taximeter** A device used to measure and calculate and display a taxi fare based on duration and/or distance.

**Taximeter area** A taximeter area is a designated area within which taxis or wheelchair accessible taxis can operate. Taxis can ply for hire on street within the taximeter area, or stand at taxi ranks where available.

**VAT** Value Added Tax

**VRT** Vehicle Registration Tax

**VRU** Vehicle Registration Unit

**WAT** Wheelchair Accessible Taxi

It should be noted that the terms Commission for Taxi Regulation, Taxi Regulator and the Commissioner are one and the same, and are used interchangeably throughout this document.



[www.taxiregulator.ie](http://www.taxiregulator.ie)

Commission For  
Taxi Regulation

35 Fitzwilliam Square  
Dublin 2, Ireland

Tel: +353 1 659 3800

Fax: +353 1 659 3801

An Coimisiún Um  
Rialáil Tacsaithe

35 Cearnóg Mhic Liam  
Baile Átha Cliath 2, Éire

[commission@taxiregulator.ie](mailto:commission@taxiregulator.ie)

[www.taxiregulator.ie](http://www.taxiregulator.ie)