Department of Transport

Purpose-built Taxi Trial
Final Review and Recommendations

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Purpose-built Taxi Trial Final Review and Recommendations

Contents

Purpose

This document provides a summary for the performance of a Purpose Built Taxi (PBT) and makes recommendations for their continued use in the Western Australian on-demand transport industry context.

Executive Summary

In December 2013, a four year trial of Purpose-Built Taxi (PBT) vehicles in the Perth Taxi Control Area commenced. The objective of the PBT trial is to assess whether a purpose-built vehicle is better placed than a standard taxi vehicle to overcome taxi-specific safety issues such as driver and passenger assaults.

The purpose-built taxi market is small and the choice of vehicles that can be made available in Australia is limited. A number of vehicle manufacturers in Australia were invited to submit a vehicle for consideration in the PBT trial. The London Taxi Company's TX4 vehicle was the only PBT vehicle available and approved for the trial.

While there were some limitations to the trial methodology, an assessment over the past four years of the PBT has concluded the following:

- Most passengers preferred the PBT over a standard taxi and were willing to wait longer
- There were significantly fewer passenger complaints made against PBT drivers, than other drivers when compared with the size of their fleet
- PBT passengers consider the vehicle is better suited for group travel and is more comfortable than a standard taxi
- The TX4 vehicle used in the PBT trial is not suitable for transportation of persons travelling in wheelchairs
- PBT drivers required fewer security contacts
- The TX4 vehicle approved for the trial currently has significantly lower repair costs than other vehicle types, possibly due to their low age
- The TX4 vehicle has similar or higher fuel costs than other vehicle types used commonly in the taxi industry
- Driver satisfaction with the PBT was low

Continuation of the trial beyond the four years is unlikely to yield any further information on the PBTs performance that will add significantly to the assessment. On this basis, a number of recommendations have been made, including that:

- the PBT trial cease on 1 January 2018;
- PBT lease holders be advised that lease fees will be applied at full cost in the last year of their lease and that the conditions of their

lease will remain until its expiry after five years, or replacement of the PBT lease with an annual taxi vehicle authorisation, whichever comes first;

- PBT lessees be released from the requirement to report trial data for fuel and maintenance costs;

- the Department of Transport develop a strategy and roadmap for extending the types of vehicles that could be made available to TUSS members and people with a disability who need to be transported in a wheelchair;

- the Government implements its reform of the taxi and charter industry as a matter of priority to allow transition for PBT lease holders to the new annual vehicle authorisation framework; and

- this evaluation report and recommendations be made available on the Department of Transport's website for the information of industry and the general public.

Background

In September 2013, as part of the Taxi Action Plan, the then Minister for Transport, announced a four year trial of approved Purpose-Built Taxi (PBT) vehicles in the Perth Taxi Control Area.

The objective of the PBT trial is to evaluate the relative merits of purpose-built taxi vehicles in comparison to re-purposed family vehicles. The trial has allowed assessment of whether a purpose-built vehicle is better placed than a standard taxi vehicle to overcome taxi-specific safety issues such as:

- assault of taxi drivers by passengers;
- assault of passengers by taxi drivers;
- passenger caused distraction of taxi drivers; and
- passenger interference with vehicle controls.

The purpose-built taxi market is small and the choice of vehicles that can be made available in Australia is limited. A number of vehicle manufacturers in Australia were invited to submit a vehicle for consideration in the PBT trial.

The London Taxi Company's TX4 vehicle was the only vehicle available at the time and approved for the trial.

The Department of Transport (DoT) supported the trial with release of 100 taxi plates (4000 series) to drivers so they could participate in the trial, which were leased through an Expression of Interest process under the provisions of the *Taxi Act 1994*.

The PBT leases were each for a period of five years, with the first four years under trial conditions. Variation to each Plate Lease Agreement was made to provide for the standard lease rates to be reduced to a nominal $1 annual fee, providing the lessee abided by the reporting requirements which were mandatory to the trial. The lease was also varied to require the plate to only be affixed to a PBT vehicle for the duration of the lease period.

PBT vehicles attract the same subsidy rates as conventional vehicles in relation to the Taxi User Subsidy Scheme (TUSS).

The PBT trial formally commenced on 1 December 2013, when the first of 100 London Taxis became operational.

Trial Assessment criteria

The broad objective of the trial was to assess the benefits of a purpose-built vehicle over a standard vehicle typically used as taxis. To make this assessment, consideration has been given to the performance of the approved PBT vehicle, in comparison to a standard taxi when measured against the following desirable attributes:

1. Driver satisfaction

   A vehicle that allows transportation of a wider range of passengers and therefore PBT drivers complete a higher number of jobs, as well as improved driver comfort.

2. Driver safety

   A driver-specific compartment and security screen that allows for improved driver safety.

3. Passenger satisfaction

   Improved passenger comfort and lower passenger complaints.

4. Passenger safety

   Separate passenger cabin space offers improved passenger safety and a higher perception of safety by passengers.

5. Accessibility

   Improved access for passengers with restrictions, including accessibility for wheelchairs.

6. Group travel

   Higher frequency of travel by groups of three or more passengers.

7. Plate holder viability

   Similar or improved operational costs in comparison to a standard taxi.

Trial methodology

To assess performance, information was sourced from taxi dispatch job data, driver monthly reporting data and passenger and driver surveys.

The PBT plate lease agreement required PBT lease plate holders to provide DoT with completed information on operator costs and to provide or assist the Department in the collection of customer survey information.

Specifically, lease holders were required to record all repairs and maintenance carried out on the trial vehicle and provide this data each month on the Operator Costs Log and Fuel Consumption Log templates provided.

The vehicle finance costs incurred by lessees were not part of the review and are not included in this report, as they are derived from private commercial arrangements between PBT lease plate holders and Combined Taxi Management.

DoT also periodically ran a customer survey during the trial to capture customer reactions to the PBT vehicles. The survey was hosted by SurveyMonkey and advertised in the trial vehicles. The lessee (or shift driver) was expected to request that customers complete the survey.

Surveys were completed for the periods January – June 2014, 2014/15 and 2015/16.

Assessments were made against a range of standard taxi vehicle types.

Limitations of the Data

Data used to assess the trial objectives was constrained by certain factors including:

- Limited job data (e.g. vehicle occupancy rates is not currently provided to DoT);
- Limited driver survey data – only 90 total responses, mostly sourced during 2014;
- Significant non-compliance by PBT lease holders in the ongoing reporting of vehicle operating costs;
- Lack of baseline data or comparative survey of passengers of standard taxis; and
- Unverified operator cost data.

Trial findings

Assessment of the PBT against relevant standards

Prior to approval of the London Taxi Company's TX4 as the approved PBT vehicle, an assessment of the vehicle against relevant standards was undertaken by DoT.

The London Taxi Company TX4 vehicles were imported into Australia under the Commonwealth Government's Specialist and Enthusiast Vehicle Scheme (SEVS). Vehicles imported under the SEVS must meet all relevant Australian Design Rules (ADRs) and the imported TX4s were issued with Identification Plate Approval. On this basis, the TX4 was deemed to meet the required standard and was approved as the PBT vehicle for the trial.

The TX4 has not been rated by the Australian New Car Assessment Program (ANCAP) for crash worthiness and occupant protection, however, in terms of safety features, the vehicle:

- is equipped with a driver airbag;
- Is not required to comply with ADR 31/02 (brake systems for passenger cars 2009) and does not have Electronic Stability Control; and
- is not equipped with traction control.

An exemption for the TX4 was granted for Rule 14 of the then applicable *Road Traffic (Vehicle Standards) Rules 2002* (Vehicle Standards Rules), solely in respect to Rule 37 of the Vehicle Standards Rules that relates to glazing in the context of the security partition. This exemption relates to the requirement of a glazing mark and was made on the basis that the partition complies with ECE Regulation 43 'Special Glazing Offering Protection From Attack'. The partition otherwise meets all required standards.

The TX4 is also equipped with an auto-locking door that prevents a passenger from alighting unless the brake is applied or the transmission is in 'park' or 'neutral' to ensure that passengers cannot alight until the vehicle is at a complete stop. This system is compliant with all relevant ADRs.

Assessment of the PBT as a vehicle for the transportation of people in wheelchairs

The approved PBT vehicle is designed, built and marketed as a purpose-built, universally accessible taxi vehicle. The wheelchair features include:

- 1350mm door height;
- 1400mm internal headroom;
- a 700mm wide fold-out ramp with a 1 in 3.65 slope to enable access for wheelchairs;
- a wheelchair restraint system designed to carry wheelchairs in a rearward facing position with a two point strap-type tie down; and
- a warning system to alert the driver if the wheelchair straps are not secure.

While the approved PBT complies with requirements for accessible transport vehicles in the United Kingdom, it does not meet the Australian *Disability Standards for Accessible Public Transport 2002*. Australian Standards requires accessible taxis to have:

- 800mm x 1300mm ground space;
- 1500mm minimum headroom;
- 800mm minimum width of boarding ramp, with 1 in 4 slope for assisted access; and
- forward facing seating.

To determine whether the approved PBT could be used to undertake certain limited wheelchair transport tasks, a pilot of a small number of vehicles and trained drivers was conducted in 2015. The pilot study determined that the TX4 vehicle should not be approved to transport persons who are restricted to their wheelchair, however, the access features of the vehicle do benefit persons with lesser mobility restrictions.

Assessment of PBT performance against the standard taxi

Driver Satisfaction

Measures: Number of jobs completed by PBTs; driver comfort.

Driver satisfaction is primarily tied to driver revenue; measured by the total number of jobs they complete. This measure considers the number of jobs completed by PBTs as a proportion of the total fleet and, separately, as a subset of the Black & White Cabs fleet.

Job data for the period 1 January 2014 – 30 June 2017 shows that the PBT fleet completed 1,105,456 of the 32,734,746 jobs undertaken by the entire Perth taxi fleet.

PBTs therefore serviced 3.4% of the total completed jobs, suggesting PBT drivers completed fewer jobs than the approximate 5% share of the total taxi fleet they occupy. However, when the number of jobs completed by PBTs is considered as a subset of the Black & White Cabs fleet, the number of jobs completed is significantly higher, suggesting these vehicles perform a significant amount of work within the Black & White Cabs fleet.

Driver comfort was significantly hampered by the quality of a number of vehicle fittings and manufacturing and warranty concerns. Main driver concerns were poor driver seat quality and braking systems (both later replaced by supplier), a small driver cabin space, and limited servicing and repair alternatives to drive down costs.

Driver Safety

Measures: Driver alarm activations; driver perception of safety.

PBT driver safety is assessed by the total number of driver alarm activations; the number of contacts made by security officers with PBT drivers as part of the weekend Taxi Security Patrol; and driver survey responses.

Job data sourced from the major taxi dispatch services shows there were significantly less alarm activations by PBT drivers during the period 1 January 2014 – 30 June 2017 when adjusted across the entire taxi fleet.

Driver Alarm Activations*

Activations	**Total**	**Proportion of Total**
PBT drivers	19	1.2%
Black and White Cabs drivers	25	1.6%
Swan Taxis drivers	1480	97.2%
TOTAL	**1524**	

* Includes full alarm and safety alerts (M99 activations)

Dependent on the circumstances, a driver alarm may or may not require and result in attendance by Taxi Security Patrol officers. A driver alarm notifies the driver's dispatch service. Attendance by Patrol officers usually takes the form of a rank visit or vehicle escort.

Approximately 3.5% of all contacts by Patrol officers with drivers between 1 January 2014 and 30 June 2017 involved a PBT. This measure is less than the 5% of the Perth taxi fleet size that PBTs occupy.

A PBT driver survey in 2014 collected 90 responses. The survey shows that 96% of drivers responding consider the approved PBT vehicle to be safer than a standard taxi vehicle. It is believed that the presence of the security screen and its impact on the transfer of cash between the driver and passenger results in this improved driver perception of safety.

Passenger Satisfaction

Measures: Passenger survey; number of complaints; passenger comfort.

The PBT passenger surveys conducted between January 2014 and June 2016 showed that there was significantly greater preference by PBT passengers for a PBT over a standard taxi vehicle.

Would you choose a PBT over a standard taxi vehicle for your next taxi trip?

	Yes %	No %	Total Responses
Jan – 30 June 2014	92.3	7.7	352
2014/15	90.4	9.6	418
2015/16	76.0	24.0	75
	89.9	**10.1**	**845**

For the period 1 January 2014 to 30 June 2017, the number of complaints by PBT passengers (by total and type) were lower when measured against all other taxi types - less than 5% as the component of the total Perth taxi fleet that PBTs occupy.

Complaint type	PBT	All other Perth taxis	PBT as a proportion of total complaints for the category %
Serious	4	157	2.5
Customer service	30	1154	2.6
Safety	2	108	1.9
Driver competency	10	298	3.4
Driver disputes	2	85	2.4
Fare evasion	84	2782	3.0
Conduct	7	630	1.1
TDS dispute	0	17	0.0
Other	15	713	2.1
TOTAL	**154**	**5944**	**2.6**

Passengers also report feeling more comfortable in PBT than in standard taxi vehicles.

How comfortable did you feel in the PBT vehicle compared to how you feel in a standard taxi vehicle?

Period	More %	Same %	Less %	Total Responses
Jan – 30 June 2014	86.3	6.4	7.3	342
2014/15	84.1	8.3	7.6	410
2015/16	64.4	12.3	23.3	73
TOTAL	**83.3**	**7.9**	**8.8**	**825**

Passenger Safety

Measures: Number of serious complaints, passenger perception of safety.

As noted in the table of taxi passenger complaints under 'Passenger Satisfaction' above, only 2.4% of all serious complaints involved a PBT. This is significantly less than the 5% share of the Perth taxi fleet that PBTs occupy. This may suggest that passengers feel safer in the PBT than other taxi types.

The passenger survey showed 68% of passengers feel safer in a PBT than in a standard taxi. This is markedly lower than the 96% of drivers that feel safer in the PBT, possibly indicating safety solutions around cabin infrastructure are more important to drivers.

How safe did you feel in the PBT vehicle compared to how you feel in a standard taxi vehicle?

Period	More %	Same %	Less %	Total Responses
Jan – 30 June 2014	73.5	21.2	5.2	344
2014/15	65.0	28.5	6.6	411
2015/16	56.0	29.3	14.7	75
TOTAL	**67.7**	**25.5**	**6.7**	**830**

Accessibility

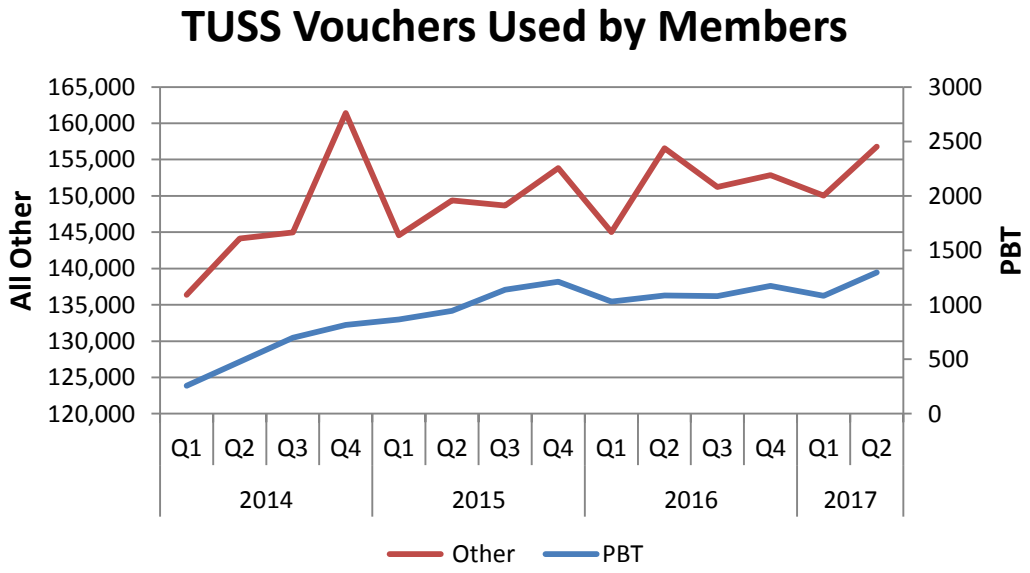
As outlined above, a small-scale pilot concluded theTX4 vehicle approved for the PBT trial could not safely load or unload persons in wheelchairs, although given the improved access features of the vehicle (such as the swivel seat, hearing loop), the vehicle could improve access for persons who could safely transfer themselves into and out of the vehicle (e.g. a mobility or vision restriction).

In February 2016, DoT published passenger guidelines to promote the PBT for specific passengers with mobility restrictions following the conclusion of the pilot. These guidelines are available at https://www.transport.wa.gov.au/On-demandTransport/transport-for-people-with-a-disability.asp#38883

Measures: Taxi User Subsidy Scheme data

Taxi User Subsidy Scheme (TUSS) passenger travel data shows there is a relatively consistent usage of PBTs by TUSS members for the period Jan 2014 – June 2017.

PBT use by TUSS members is low – less than 1% of the total TUSS trips made between 1 January 2014 and 30 June 2017. This amount is less than the 5% of the component of the total Perth taxi fleet that PBTs occupy.



Group Travel

Measures: Driver survey; passenger survey.

The PBT can seat a group of 5 adult passengers, one more than a standard taxi. Passenger feedback about group travel was collected via a survey.

Passengers – Have you used a PBTin a group of 3 or more?

Period	Yes %	No %	Total Responses
Jan – 30 June 2014	29.8	70.2	342
2014/15	31.7	68.3	410
2015/16	28.8	71.2	73
TOTAL	**30.7**	**69.3**	**825**

When travelling in a group of 3 or more people, how did you find the space and social environment the PBT offered for the passengers, compared to a standard taxi?

Period	Better %	Same %	Worse %	Total Responses
Jan – 30 June 2014	93.0	1.0	6.0	100
2014/15	93.1	3.1	3.8	130
2015/16	81.0	4.8	14.3	21
TOTAL	**92.0**	**2.4**	**5.6**	**251**

The above appears to indicate approximately two-thirds of passengers surveyed did not travel in a group of three or more persons, although those that did considered the passenger space in the approved PBT vehicle better than a standard taxi.

The driver survey suggests 91% of the 90 survey responses collected consider that less than 10% of their jobs are for groups of five passengers. Job data provided to DoT does not currently collect tariff 3 work that evidences travel by five or more persons. Driver survey responses cannot therefore be verified.

Plate Holder Viability

Measures: Monthly repairs and fuel costs for the approved PBT vehicle, compared to standard taxi vehicle

Costs to operate a taxi include vehicle finance costs, insurance, rank fees, repairs and fuel costs. This review only considers TX4 fuel and repair costs as these are vehicle specific.

Costs to repair the TX4 vehicle were sourced from data provided by PBT lessees during the period 1 January – 30 June 2017. For comparison, repair costs for a Ford Falcon sedan, a commonly used vehicle for taxis, were collected in 2011 and escalated to 2017 dollars.

Significant differences exist that preclude an accurate comparison between operating costs of the PBT and the standard taxi vehicle, including how vehicle models differ in both type and age.

PBT and Standard Vehicle Operating costs

Based on the period 1 January – June 30 2017, average PBT vehicle repair and servicing costs were $220.36 per month. This amount is significantly less than the $462 average for a typical Ford Falcon sedan in the taxi fleet. This could be partially attributable to the PBT vehicles being younger than the average age of a standard taxi.

Fuel consumption data suggests the TX4 vehicle and a 2014 Ford Falcon FG[2] (6 cylinders, 4L, ULP) consume roughly the same volume of fuel per 100km. The TX4 consumes 8.8L diesel per 100km whereas the ULP fuelled Ford Falcon consumes 9L unleaded petrol per 100km. The LPG fuelled Ford Falcon FG consumes 11.7L per 100km. A 2014 Toyota Camry[3] (4 cylinder, 2.5L) consumes 7.8L of unleaded petrol per 100km; whereas the hybrid[4] version consumes 5.7L per 100km.

Using average fuel prices for Perth between Jan 2014 – June 2017[1], this equates to $0.12/km for the ULP fuelled Ford Falcon, $0.09/km for the LPG fuelled Ford Falcon, $0.10/km for the Toyota Camry, $0.08/km for the Toyota Camry Hybrid, compared with $0.12/km for the TX4.

Vehicle Type	**Fuel Cost ($/km)**	**Monthly Repair Cost ($)**
Approved PBT vehicle - TX4	0.12	220.36
Ford Falcon ULP	0.12	462.16
Ford Falcon LPG	0.09	NA
Toyota Camry	0.10	NA
Toyota Camry Hybrid	0.08	NA

The driver survey determined that PBT drivers perceived the vehicle has lower fuel economy, less reliability and poorer handling when compared with a standard taxi.

References

1 https://www.fuelwatch.wa.gov.au/fuelwatch/pages/public/historicalPriceSearch.jspx
2 https://www.whichcar.com.au/detail/2016-toyota-camry/48788
3 https://www.motoring.com.au/toyota-camry-hybrid-2015-review-48374/
4 https://www.motoring.com.au/ford-falcon-fg2-2014-review-47786/

Conclusion

The PBT trial has found that passengers perceive PBTs as being safer than standard taxis; they submit fewer complaints against PBT drivers; consider the vehicle to be more comfortable and overall have a higher level of satisfaction with the vehicle in comparison to a standard taxi.

Passenger accessibility outcomes have been poor, with low usage of the PBT by members of the Taxi User Subsidy Scheme, coupled with the adverse outcome of the PBT Wheelchair Pilot. It is evident that providing an on-demand vehicle that meets Australian standards for wheelchair access remains a high priority for both Government and industry.

Few conclusions could be made about how the PBT promotes higher-occupancy travel as current taxi dispatch data does not capture this metric. However, limited passenger survey data suggests the vehicle has a high level of comfort for groups of three or more persons.

PBT drivers have a higher perception of safety in a PBT; are involved in fewer contacts with Taxi Security Patrol officers and make fewer driver alarm activations when measured across the Perth taxi fleet.

PBT drivers, however, consider the vehicle to offer a poor level of driver comfort. This, coupled with the fewer jobs completed when compared to other taxi drivers, leads to a lower level of satisfaction overall.

PBT drivers also report lower repair costs and similar fuel costs to an unleaded fuelled Ford Falcon. Fuel costs for the approved PBT vehicle (TX4) are higher than a Toyota Camry, Toyota Camry Hybrid and LPG fuelled Ford Falcon. PBT vehicle repair costs are likely to increase as the vehicles age, thereby closing the gap in repair costs incurred by other taxi vehicle types. Anecdotally, drivers consider TX4 operating vehicle costs to be high due to financing costs. In summary, drivers consider the PBT vehicle is safer but more expensive overall than a standard taxi.

Changes to the industry and future reform

Since the PBT trial began in 2013, there have been significant changes to Western Australia's on-demand transport (OdT) industry, consistent with trends occurring nationally and internationally. Customers now have higher expectations in relation to the types of services they want to use and enjoy, the wait times they are willing to accept and the amount of live information they receive about their OdT service.

Historically, Perth's on-demand transport industry has been served by taxis and luxury small charter vehicles, regulated as two distinct categories. In recent years, however, the distinction between taxis and charter vehicles has diminished and there is now a degree of competition between the two sectors.

The emergence of new entrants into the charter vehicle space, together with a general downturn in the WA economy, has resulted in a decline of taxi jobs across Perth of approximately 40% since 2013. This has been borne by the whole industry including the PBT fleet. Due to this downturn, many PBT operators are experiencing reduced fare revenues and, together with significant vehicle financing costs, this is impacting on the viability of operating the PBT vehicle in the current economic and competitive climate.

The Government is responding to this change in consumer expectations and emergence of innovative on-demand transport business models. In 2018, subject to the passage of legislation, new unifying laws will address current inconsistencies in the way taxi and charter vehicles are regulated and deliver the vision of a safe, flexible, accountable, innovative and customer-focused OdT industry.

In late 2018 it is expected that new legislation will come into effect that provides for a simpler, less prescriptive regulatory environment that will:

- regulate drivers, vehicles and booking and dispatch services which are in the business of conveying passengers for on-demand hire and reward;
- provide incentives and controls to ensure the sustainable delivery of on-demand transport services in areas where market provision of such services may not be optimal; and
- provide incentives and controls to ensure sustainable provision of on-demand transport services to people with disability.

Of relevance to the PBT trial is that the reform will remove restrictions on when, where and how a taxi vehicle is operated throughout the State, placing them on a more equal footing with charter vehicles. Any vehicle that meets an annual roadworthy inspection and has the appropriate level of Motor Injury Insurance will be able to be authorised as an on-demand vehicle. If the vehicle also has security cameras, a meter, roof sign and livery, it can be operated as a taxi, with exclusive access to rank and hail work. A taxi plate lease will not be required going forward.

With its perceived advantages in passenger comfort and group travel, the PBT may be of interest to vehicle operators looking to operate in the general taxi or charter market or as a niche product to groups.

Recommendations

The information and data gathered as part of the four year trial has allowed an assessment of whether a PBT offers advantages to the driver, vehicle operator and customer over a standard taxi vehicle. On this basis, it is recommended that:

1. the PBT trial should cease from 1 January 2018;
2. continued subsidisation of the PBT trial through nominal $1 lease fees should not be supported on the grounds that:
    - the vehicle approved for the PBT trial cannot be used to transport passengers who remain in their wheelchair during transit. It is also difficult for those with fold up wheelchairs to enter and exit the vehicle, so it does not meet the needs to provide adequate services for those requiring universally accessible on-demand transport;
    - fuel usage and running costs for the approved PBT vehicle are generally greater than those of the commonly used taxi vehicles. While not assessed in this trial, it is understood that newer vehicles such as the Toyota Camry Hybrid offers improved emissions than the TX4 vehicle. On this basis, there does not appear to be any real economic or environmental benefit to the approved PBT over a standard taxi vehicle; and
    - while the PBTs provide greater comfort and safety to passengers, in the more demand driven taxi and charter market these attributes will be competitive advantages and do not require subsidisation.
3. all PBT lease holders should revert to full lease fees for the last year of their five year lease, as originally intended;
4. all PBT lease holders should remain on the current terms of their lease and operating conditions until the expiry of their five year lease or replacement of the PBT lease with an annual taxi vehicle authorization, which will be allowed under the proposed OdT legislation, whichever comes first;
5. all PBT lease holders should be advised that the vehicle operating costs and driver survey reports associated with the PBT trial are no longer required to be submitted to DoT;
6. DoT develop a strategy and roadmap for extending the types of vehicles that could be made available to TUSS members and people with a disability who need to be transported in a wheelchair;
7. the Government implements its reform of the taxi and charter industry as a matter of priority to allow transition for PBT lease holders to the new annual vehicle authorisation framework as soon as possible; and
8. this evaluation report and recommendations be made available on the Department of Transport's website for the information of industry and the general public.