



Dear Mr Brennan,

Thank you for your email. The ridesharing transport model, operating in certain jurisdictions outside Ireland, has been to use vehicles and drivers which, and who, do not hold the conventional licences required for taxis or hackneys for the carriage of persons for reward. That model of operating commercial services for hire without licences is not a model that would comply with primary legislation in Ireland, and it is not anticipated that SPSV legislation will be amended in this regard.

For example, Uber has categorically assured the National Transport Authority that, under its Uber Taxi and Uber Black offerings in Ireland, it contracts only with licensed drivers using licensed vehicles, together with operating the taximeter and remaining within the Maximum Fares Order for taxi journeys as obliged at law. Uber Pop (ridesharing) is not offered in Ireland.

Unlike other countries, Ireland's taxi and hackney vehicle market is very much an open market. There are no quantitative controls imposed and the barriers to entry are low. Analysis undertaken by Indecon Economic Consultants for the Taxi Regulation Review at the end of 2011, identified that "[o]n a national level, oversupply is estimated to be in the range of 13-22% of the current SPSV fleet". While there has been some further reduction in supply since then, and, anecdotally, some increase in demand, there is no evidence of any significant undersupply issues other than in some rural areas where the level of demand to support a fulltime service doesn't exist.

Taxi and hackney license's currently issue only for wheelchair accessible vehicles. This reflects a necessary and proportionate Authority policy of seeking to increase the level of wheelchair accessible vehicles in the SPSV fleet. Currently only about 5% of SPSVs are wheelchair accessible; this can be compared to figures of 100% for London and 45% across Scotland. A major review of the industry was published just three years ago, under a review group chaired by Minister Alan Kelly. As part of that review the issue of permitting new licences for non-wheelchair accessible vehicles was discussed, and such an approach was not recommended in the final report approved by Government.

Overall, it is the view of the Authority that it would be inappropriate to undermine the current policy of seeking to address the public transport needs of mobility impaired people. We do not believe that the Irish market is under-supplied by conventional SPSV services and do not anticipate the amendment of current legislation to facilitate a ridesharing model associated with a commercial booking facility.

Yours sincerely,

National Transport Authority