

The **Allen Consulting** Group

RIS analysis of Dedicated School Bus exclusions option

Supporting analysis to Review of the Disability Standards for Accessible
Public Transport

October 2009

Report to Australian Government Department of Infrastructure, Transport, Regional Development
and Local Government

The Allen Consulting Group

The Allen Consulting Group Pty Ltd
ACN 007 061 930, ABN 52 007 061 930

Melbourne

Level 9, 60 Collins St
Melbourne VIC 3000
Telephone: (61-3) 8650 6000
Facsimile: (61-3) 9654 6363

Sydney

Level 12, 210 George St
Sydney NSW 2000
Telephone: (61-2) 8272 5100
Facsimile: (61-2) 9247 2455

Canberra

Empire Chambers, Level 2, 1-13 University Ave
Canberra ACT 2600
GPO Box 418, Canberra ACT 2601
Telephone: (61-2) 6204 6500
Facsimile: (61-2) 6230 0149

Perth

Level 21, 44 St George's Tce
Perth WA 6000
Telephone: (61-8) 6211 0900
Facsimile: (61-8) 9221 9922

Online

Email: info@allenconsult.com.au
Website: www.allenconsult.com.au

Disclaimer:

While the Allen Consulting Group endeavours to provide reliable analysis and believes the material it presents is accurate, it will not be liable for any claim by any party acting on such information.

© The Allen Consulting Group 2009

Contents

Chapter 1	1
<i>The nature and extent of the problem</i>	<i>1</i>
1.1 The Disability Standards for Accessible Public Transport	1
1.2 Scope of the Transport Standards	2
1.3 Treatment of dedicated school bus services in the Transport Standards	2
Chapter 2	9
<i>The objective of government action</i>	<i>9</i>
Chapter 3	10
<i>Options to address the problem</i>	<i>10</i>
Chapter 4	11
<i>Impact analysis</i>	<i>11</i>
4.1 Potential business compliance costs and competition impacts	11
4.2 Costs of Option 2: Phased removal of exclusions for dedicated school bus services from certain parts of the Transport Standards	12
Chapter 5	16
<i>Conclusion and recommended option</i>	<i>16</i>
Chapter 6	17
<i>Consultation</i>	<i>17</i>
6.1 Public hearing locations and participants	17
6.2 Individual meetings	33
6.3 Written submissions	34
6.4 Submissions received on the Draft Report	37

Chapter 1

The nature and extent of the problem

1.1 The Disability Standards for Accessible Public Transport

The introduction of the Commonwealth's *Disability Discrimination Act 1992* (the DDA) represented a fundamental shift in the treatment of people with disability in Australia. The DDA diverged from the traditional medical model of disability, instead adopting a new approach premised on an individual's right to engage in meaningful social and economic experiences. Section 3 of the DDA states that the objects of the Act are:

- (a) 'to eliminate, as far as possible, discrimination against persons on the ground of disability in the areas of:
 - (i) work, accommodation, education, access to premises, clubs, sport; and
 - (ii) the provision of goods, facilities, services and land; and
 - (iii) existing laws; and
 - (iv) the administration of Commonwealth laws and programs; and
- (b) to ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community; and
- (c) to promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community'.

While the DDA makes discrimination on the grounds of disability unlawful it does not:

- specify the ways in which compliance can be tested, or the means by which parties assure compliance with the DDA; or
- provide clarification on the specific matters relating to the requirements of the DDA (except where an exemption is provided by the Australian Human Rights Commission [AHRC] or there is a determination by a court).

In response to these issues, the Australian Government sought to develop Disability Standards under the DDA in the areas of education, access to premises, public transport and employment. The Disability Standards for Accessible Public Transport (Transport Standards) were the first Disability Standards to be introduced when they were passed into law on 23 October 2002.

1.2 Scope of the Transport Standards

The Disability Standards for Accessible Public Transport establish minimum accessibility requirements for the providers and operators of ‘public transport conveyances, infrastructure and premises’. They include a wide range of requirements for: access paths; manoeuvring areas; ramps and boarding devices; allocated spaces; doorways; controls; symbols; signs; waiting areas; boarding points; allocated spaces; surfaces; hand and grab rails; doorways and doors; lifts; stairs; toilets; Tactile Ground Surface Indicators (TGSIs); alarms; lighting; controls; furniture and fittings; street furniture; gateways; payment of fares; hearing augmentation-listening systems; information provision; booked services; food and drink services; belongings; and priority arrangements (Attorney-General’s Department, 2006).

The Transport Standards set out requirements for providers and operators that apply to the following modes of transport or ‘conveyances’

- aircraft
- buses or coaches
- ferries
- taxis
- trains, trams, light rail, monorails, rack railways and
- any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.

The Transport Standards themselves are not structured around modes of transport, but apply to each mode in a particular way (allowing for the nature of the mode and what needs to be done to provide accessibility).

Some transport services, such as school bus services and limousines and hire cars, were excluded from some, or all Parts of the Transport Standards during the implementation phase, in response to particular cost or technical concerns. The AHRC has the power to grant temporary exemptions from the DDA and the Transport Standards on application. These temporary exemptions allow providers a specified period of time to address particular problems with meeting the requirements in the Transport Standards.

1.3 Treatment of dedicated school bus services in the Transport Standards

A dedicated school bus service is defined in the Transport Standards as a service that operates to transport primary or secondary students to or from school or for other school purposes (Part 1.13). These services are excluded from 26 parts of the Transport Standards, as detailed in Table 1.1.

Table 1.1

EXCLUSIONS FROM THE TRANSPORT STANDARDS FOR DEDICATED SCHOOL BUSES

Transport Standards Part	Notes
3.2 Access for passengers in wheelchairs	Requires that passengers in mobility aids must be able to enter and exit a conveyance and position their aids in allocated spaces
6.2 Boarding ramps	Specifies that a boarding ramp must comply with the relevant Australian Standard
6.3 Minimum allowable width (ramps)	-
6.4 Slope of external boarding ramps	Specifies the slope of boarding ramps, for both assisted and unassisted access
8.2 When boarding devices must be provided	-
8.3 Use of boarding devices	Specifies that the boarding device must be provided at all designated stops
8.4 Hail-and-ride services	Specifies the use of boarding devices for Hail-and-ride services
8.5 Width and surface of boarding devices	-
8.6 Maximum load to be supported by boarding device	-
8.7 Signals requesting use of boarding device	-
8.8 Notification by passenger of need for boarding device	-
9.1 Minimum size for allocated space	-
9.4 Number of allocated spaces to be provided – buses	-
9.7 Consolidation of allocated space	Suggests that allocated spaces should be consolidated
9.9 Use of allocated space for other purposes	Specifies that allocated spaces can be used for other purposes
9.11 Movement of mobility aid in allocated space	Specifies that an allocated space must contain movement of a mobility aid towards the front or sides of a conveyance
10.1 Compliance with Australian Standard (surfaces)	Specifies the ground and floor surfaces on conveyances
11.3 Handrails on steps	-
11.4 Handrails above access paths	-
11.5 Compliance with Australian Standards (grabrails)	Specifies that grabrails must comply with the relevant Australian Standard
11.6 Grabrails to be provided where fares are to be paid	-
11.7 Grabrails to be provided in allocated spaces	-
12.1 Doors on access paths	Requires that any doors along an access path not present a barrier to independent travel
12.4 Clear opening of doorways	-
12.6 Automatic or power-assisted doors	-
14.1 Stairs not to be sole means of access	-

Source: Disability Standards for Accessible Public Transport Guidelines 2004 (No. 3), p. 49.

The exclusions set out in Table 1.1 effectively mean that dedicated school buses are excluded from all physical access requirements in the Transport Standards. That is, dedicated school buses are not required to:

- provide a boarding device for people using mobility aids;

- provide handrails or grabrails;
- provide any allocated spaces for people with mobility aids;
- include appropriate surfaces; or
- provide automatic or power-assisted doors, or have doorways of a specific width to assist people with mobility impairments.

Table 1.2 lists those Parts of the Transport Standards that apply to dedicated school bus services.

The rationale behind the exclusions

The exclusion of dedicated school buses from physical access Parts of the Transport Standards was a response to the identified costs of these particular Parts, which require investment in low-floor buses or retro-fitting of coaches. While not a full exclusion, the remaining applicable Parts only provide a small degree of accessibility, primarily to those students with a vision impairment (through the requirements around signs, illumination and information). The exclusions remove any requirement that dedicated school buses are accessible for any student using a mobility device, or any student who has a mobility impairment which means that they cannot negotiate a series of stairs to enter and exit the bus (particularly as there is no requirement for handrails or grabrails).

The RIS for the proposed Transport Standards estimated that the costs of making dedicated school buses fully compliant with the Transport Standards would be \$1265 million over 20 years (1998 prices) (Attorney-General's Department, 1999), which would be incurred by a large number of small bus operators. These costs were deemed to be extremely high. It was further argued by school bus service operators that:

- they are small business people, generally using older and often second-hand vehicles, turning them over less frequently;
- there is little or no demand for accessible services, the cost is not warranted by the limited demand;
- it is unlikely that there would be [an] accessible pathway between the bus stop and home so that improvements to buses would not be utilised; and
- bus stops are generally unformed, sometimes merely the space required for the bus to pull over on the roadside (Attorney General's Department, 1999).

It is also noted on the Attorney-General's Department's website that the reason for the exclusions for dedicated school buses were a response to problems associated with operating low-floor buses on 'difficult terrain' (Attorney-General's Department, 2006).

Table 1.2

THE TRANSPORT STANDARDS THAT APPLY FOR DEDICATED SCHOOL BUSES

Transport Standards Part	Notes
2.6 Access paths – conveyances	-
2.7 Minimum width between front wheel arches of bus	-
2.8 Extent of path	-
9.10 International symbol of accessibility to be displayed	Not applicable for buses without wheelchair accessibility
16.1 International symbol for accessibility and deafness	-
16.2 Compliance with AS2899.1 (1986)	-
16.3 Accessibility symbols to incorporate directional arrows	
16.4 Accessibility symbol to be visible on accessible bus	
17.1 Signs – height and illumination	
17.3 Signs – location (conveyances)	
17.4 Destination signs to be visible from boarding point	-
17.6 Raised lettering or symbols or use of Braille	-
19.1 Emergency warning systems	
20.2 Illumination levels – conveyances	-
20.3 Dimming	-
21.2 Passenger-operated devices for opening and closing doors	
21.3 Location of passenger-operated controls for opening and locking doors	-
21.4 Signal devices for conveyances that stop to request	-
25.1 Passengers to pay fares	Limited applicability
25.2 Fare payment and ticket validation systems	Limited applicability
25.3 Vending machines	Not applicable on school services
26.2 Public address systems – conveyances	Not applicable as address systems are not used
27.1 Access to information about transport services	
27.2 Direct assistance to be provided	
27.3 Size and format of printing	
27.4 Access to information about location	
29.1 Equal access to food and drink services	Not applicable as food and drink services are not provided on school services
31.1 Priority seating	Not applicable as school services do not have booked seating
31.2 Information to be provided about vacating priority seating	Not applicable as per 31.1

Source: Disability Standards for Accessible Public Transport Guidelines 2004 (No. 3), p. 49.

Analysis of this issue in the RIS for the Transport Standards considered that para-transport solutions would be more cost effective than upgrading school buses. The RIS recommended that school buses be considered in Action Plans of States and Territories, with the view to further considering options of making school bus services accessible in the future. In spite of this suggestion, recent Action Plans released have not progressed this issue further; indeed it appears that the majority of

stakeholders consider the exclusions for dedicated school buses to be a full exclusion from the Transport Standards. For example, the Victorian government Action Plan notes that the issue of school buses is not considered in the Action Plan because school buses are ‘excluded from the Transport Standards’ (Victorian Department of Infrastructure, 2006 p. 5).

The impact of the exclusions

In submissions and public hearings for this review, several stakeholders expressed concern about the impact of the exclusions for dedicated school buses. Most stakeholders who commented on this issue considered there to be a full exclusion, rather than partial exclusion as noted above. As noted in the Canberra hearing:

The decision to excise dedicated school buses from the standards is just mind boggling to me. It’s a missed opportunity to use the leveraging power of government spending to get bus operators, manufacturers and designers to start thinking about access and spread that beyond the bus fleet. (Craig Wallace, Canberra Hearing Transcript, p. 10)

While the current exclusions of dedicated school buses do provide a cost saving (through avoided costs of retro-fitting coaches or purchasing low-floor buses), there are other costs incurred due to students with mobility impairment not being able to access dedicated school buses. Currently, some students with disability who are not able to access school bus services receive subsidies to cover costs of alternative transport. The extent to which this support is available varies considerably by jurisdiction. For instance, in some jurisdictions funding is only provided for students in government schools, whereas in others, funding is also available for students who attend non-government schools. Costs of upgrading school buses therefore needs to be considered in the context of:

- on-going costs of government programs that could be significantly reduced if dedicated school buses were upgraded over a 20-year period; and
- reduced cost for parents who currently have to provide private transport for their children, where government subsidy is not available.

In addition, the recent trend of students with disability attending mainstream schools (with reduced use of special schools) provides further evidence that providing a transport service that accommodates all students (as they are travelling to the same destination) is likely to be a more cost effective solution in the longer term. (Allen Consulting Group 2003, p. 50)

This review also received comments from stakeholders about the current gap in assistance for students who wish to participate in vocational education once they have completed school, but have no transport assistance to do so. This issue is particularly important in rural areas, where taxis or other para-transport is funded for students to complete high school, but is not available for tertiary students. While tertiary students in rural areas are able to use the school bus service to travel to TAFE or university, this is not an option for students with a mobility impairment.

The exclusions granted for dedicated school buses have broader implications, outside of their impact on students with disability. In rural and regional areas, where the majority of bus services are provided as dedicated school bus services. Wellington Shire Council, for example, reports in their submission that there are 62 school buses, two route buses and a V/Line replacement service operating in the Shire. As noted below, the preponderance of public transport in rural and regional Australia is inaccessible.

The few town and route services that are provided in 'rural' communities mostly utilize school buses during down time. Because of the exemption from DDA legislation there is no requirement or incentives for local operators to provide 'accessible' transport in rural remote areas. (sub. 14, p. 7)

Exclusions for dedicated school bus services put pressure on the taxi industry to provide accessible transport for school students, reducing its capacity to meet the demands of other WAT users before and after school. Many people with disability that rely on WATs reported that they are generally unavailable for a period in the morning and afternoon when they are doing prearranged school trips for students in wheelchairs. This problem is pronounced in regional centres (such as Launceston) where there are fewer WATs and a lack of other accessible options.

Exclusions for dedicated school bus services also raise concerns about the practice of allowing other patronage on school services. In rural and regional areas it is common practice for non-school students to also use the service to get into town. It is currently not clear if, in allowing other patronage on a school bus service, the service remains a dedicated school service or becomes a general access service. If dedicated school bus services that provide a service to other patrons are considered to be providing a general access service, companies may be forced to stop the practice to avoid being subject to the requirements of the Transport Standards.

The reasons given in the RIS on Draft Disability Standards for Accessible Public Transport (Attorney-General's Department, 1999) for excluding school bus services (as outlined above) do not provide a strong case for maintaining the exclusions. There are many similarities between dedicated school bus services and general access services. Many general access bus companies are small businesses, which operate on rural roads with the same terrain issues as the dedicated school bus services. Further, a lack of patronage was not considered a sufficient reason for exclusion of any other type of public transport service during the development of the Transport Standards (nor are the objectives of the Transport Standards couched in terms of whether there is sufficient patronage). In addition, it is unclear on what basis it was determined that there was no demand for accessible school bus services.

Arguments about a lack of bus stop infrastructure also ignore the fact that bus stop infrastructure is required to be upgraded for route services in the same regions. Finally, the reasoning behind the exclusions was not that they would provide exclusions, but rather that further assessment and consideration would be made to making dedicated school bus services accessible in the future. Unfortunately, the experience has been that stakeholders, including State and Territory governments, have progressed on the basis that dedicated school bus services are fully excluded.

The current distinction made in the Transport Standards creates a market distortion and encourages rent seeking behaviour by reducing the incentives for providing route bus services over school bus services because of the differential requirements. This outcome limits the effectiveness of the Transport Standards. It is also particularly concerning that despite the implementation of the Transport Standards, and the Disability Standards for Education, there is no requirement to remove discrimination against students with disability by providing accessible transport for them to travel to and from school (though most States and Territories fund some form of transport, usually taxis, for students in wheelchairs).

In their submissions on the Draft Report, State and Territory Governments raised low patronage as a reason to keep the exclusions. The Victorian Government reported in their submission on the Draft Report that since 2000 the number of students requiring accessible school transport has been fewer than ten at any one time. This represents approximately 0.01 per cent of the 71 000 students who use the school bus system. Currently Victoria has a fleet of 1540 school buses, only nine of which are wheelchair accessible (sub DR54, p.17). Similarly, the South Australian Government provides 519 regular school bus services and in 2008 provided transport for five rural students who used wheelchairs (sub. DR53, p.4).

State and Territory Governments also argued that even if all school buses were accessible it would still be necessary to provide some alternative forms of transport for some individuals with disability. The New South Wales Government noted this issue in their submission to the Draft Report.

Some children have severe disabilities that prevent them from travelling independently, irrespective of whether the bus is accessible. Other children have intellectual or behavioural disabilities that would prevent them travelling unsupervised with other children. It is likely therefore that a special transport scheme would still be necessary even if all dedicated school buses were accessible. (sub DR37, p.1)

Therefore, the costs associated with providing taxi transport for people with disability in areas that do not have an accessible bus service would not necessarily be negated by the introduction of an accessible bus service.

However, given the integral role played by school buses in the provision of public transport for the whole community in non-metropolitan areas the number of school students does not accurately represent the level of need. There is no accurate measure of other people with disability — other than school students — who would use the school bus network in rural areas if it were more accessible. Mrs Cannon described the difficulty in finding her mobility impaired son transport to attend a NSW Department of Education funded program in Parkes.

Our son has just left school last year and he's been funded to attend Kurrajong Enterprises in Parkes from 9 to 3 five days a week, that's an 80 km one-way trip for us and obviously we can't do that. We can't take him in and out, in and out and go back and get him each day. We have no way of getting him there. (Mrs Cannon, Dubbo Hearing Transcript)

Chapter 2

The objective of government action

The purpose of the Transport Standards are stated as:

Purpose of Standards

(1) The *Disability Discrimination Act 1992* seeks to eliminate discrimination, 'as far as possible', against people with disabilities. Public transport is a service covered by the *Disability Discrimination Act 1992*.

(2) The purpose of these Standards is to enable public transport operators and providers to remove discrimination from public transport services. (Section 1.2)

The objective of government action in reviewing the Transport Standards is to ensure that the Transport Standards are effective and efficient in achieving their objectives. The purpose of government action in considering how dedicated school bus services are treated in the Transport Standards is to ensure that this treatment is consistent with the objectives of the DDA.

Chapter 3

Options to address the problem

The treatment of dedicated school buses was an issue raised in the five-year review of the Transport Standards. Options to address the problems raised by stakeholders were explored through the Draft report and Final report for the review.

The Draft report of the five year review sought views on a proposal to remove the exclusions for dedicated school bus services from the Transport Standards. Stakeholder comments on the potential removal of the exclusion were divided. Industry and State and Territory governments are strongly opposed to the removal of the exclusion on the basis of the costs to providers. Disability organisations support the removal of the exclusion on the grounds that it constitutes discrimination.

This final report considered two options:

Option 1: status quo, maintaining current exclusions in the Transport Standards

Option 2: removing the exclusions in the Transport Standards that apply to dedicated school bus services, over an extended time period.

Chapter 4

Impact analysis

The impact analysis in this chapter assesses the costs and benefits of a removal of the exclusions for dedicated school buses in the Transport Standards. It assesses the impact of this approach (option 2 as set out in chapter 3) against the status quo (option 1) which involves no change to the current arrangement.

This analysis includes an assessment of the potential likely business compliance costs and competition impacts, as required in the preliminary assessment phase of the assessment of a regulatory proposal, and estimates of the costs and benefits of option 2 (based on the preliminary assessment).

4.4 Potential business compliance costs and competition impacts

An initial assessment of a regulatory proposal should consider the potential for business compliance costs, the type of costs, and any potential impacts on competition.

Table 4.3 sets out the expected impact on business compliance costs of removing the exclusions in the Transport Standards for dedicated school bus services, and Table 4.4 sets out the expected competition impacts. On the basis of the potential costs to business for new equipment and materials (i.e. bus purchases), further analysis of the costs and benefits are provided in this Chapter.

Table 4.3

POTENTIAL BUSINESS COMPLIANCE COSTS OF OPTION 2

Types of costs	Relevance	Type of likely compliance costs
Reporting	No	-
Keeping informed of obligations	Yes	Potential cost for providers if Transport Standards are amended
Seeking permission	No	
Purchase of materials, equipment or external advice	Yes	Where providers are required to purchase a vehicle that complies with the new requirements in the Transport Standards, which they otherwise would not have purchased
Record keeping	No	
Audits or inspections	No	
Producing documents	No	
Other changes to procedure or practices	Yes	Potential change for operators in assisting students with disability to access the bus service (though these obligations currently exist to some degree)

Table 4.4

'OTHER IMPACTS' CHECKLIST FOR THE REGULATORY OPTION

Will the proposal...	Assessment
Potentially affect the number and range of businesses in an industry?	The requirements may impact very small providers, though these providers would have a strong case on unjustifiable hardship grounds
Potentially change the ability of businesses to compete?	As requirements will be consistent across the sector, there should not be a competitive impact (if anything, this option removes a current distortion in the market by excluding an element from the requirements in the Transport Standards)
Potentially alter the incentive for business to compete?	See above
Potentially impact on consumers?	Positive impact on students with disability and their families. Positive impact on people with disability seeking to access services which are currently used to transport students with disability (such as WATs)
Potentially have any other impacts on business and individuals or the economy?	None evident at this stage

4.5 Costs of Option 2: Phased removal of exclusions for dedicated school bus services from certain parts of the Transport Standards

The costs of the *immediate* removal of the exclusions relate primarily to:

- the cost of upgrading current vehicles to be accessible for people with mobility impairment, estimated to be:
 - \$30,000 for a light vehicle (sub. DR49)
 - \$40,000 for a heavy vehicle (sub. DR49)
 - \$60,000 for a coach (to fit a 'lift' in a coach) (Canberra public hearing transcript, p.15)
- the incremental cost 'premium' of purchasing a new low floor accessible bus compared with the cost of a new 'standard' bus (estimated to be a maximum of \$100,000).

These costs will be greatest where upgrades are required within a short space of time, or where new vehicles which cannot be retrofitted need to be replaced before the end of their economic life (in this context, this is considered as the period in which the bus fits within the fleet age requirements for school bus contracts).

The commitment in the original development of the Transport Standards, and in the Regulation Impact Statement for the Transport Standards, was to further investigate the inclusion of school bus services into the Transport Standards at a later date, or other options that may improve accessibility of school bus services for students with disability. To date, no further progress has been made against this objective,

though this review considers that it would be valuable to consider developing a timeframe for the future inclusion of dedicated school bus services (and investigating what future timeframe would be most appropriate on cost-benefit grounds). The RIS for the Transport Standards flagged this delayed approach as an option for government in addressing this issue, canvassing an option where:

provision in the draft standards for a longer target date for implementation by dedicated school bus operators, enabling them to move to accessible vehicles in the second replacement cycle rather than the first; (this would require them to be accessible within approximately 30 years).

This suggestion in the Transport Standards RIS reflects a potential option to reduce the overall cost impact of removing the exclusion by extending the timeframe for compliance beyond those requirements in the Transport Standards for route bus services and coaches. This approach would reduce costs because:

- it would effectively remove any costs of upgrading or retrofitting existing vehicles because the timeframes would be such that providers would have sufficient forward planning time to purchase an accessible vehicle once their current stock has reach the end of its ‘economic life’; and
- it enables the first ‘wave’ of second hand low floor vehicles currently being purchased for route services to be available for dedicated school bus providers, which would lower the ‘premium’ on low floor buses that currently exists in the second hand bus market (which stakeholders report is driven by a very small supply of these types of buses in the second hand market).

The cost of removing the exclusions for school bus services can be minimised where the school bus fleet can be replaced at ‘end of life’. State and Territory Governments usually include a maximum and average age for bus fleets within service contracts. Different jurisdictions have different requirements regarding the age of their school and public transport service bus fleets (information from jurisdictions places this age between 12 and 22 years). These differing requirements (and the replacement of buses used for route services) result in a supply of less expensive, second-hand low floor buses that are frequently employed as school buses in rural and regional areas.

Removing the current exclusions for dedicated school bus services will impose costs on providers, but there are options to minimise these costs through a gradual timeframe for implementation.

The least cost approach to removal of the exclusions would be for providers to be able to fully capture the full economic life of the assets they hold at the time of notification of any change to the requirements in the Transport Standards. In this analysis, the notification date is assumed to be 2012, given the required time for amendments of the Transport Standard to be implemented, and the consistency of this being timed with the next scheduled review of the Transport Standards.

Based on State and Territory data the median maximum vehicle age in a school bus fleet is 17 years, meaning that an implementation start date of 2029 would allow for a new vehicle purchased at the time of the change in the Transport Standards to be fully utilised for its contract term (its ‘economic life’ as a school bus).

Data collected from State and Territory governments indicates that an average age for a route service fleet is around 12 years, suggesting that the first ‘tranche’ of vehicles purchased to comply with the 2007 requirements of the Transport Standards will be entering the second hand market by 2019, which will have the effect of reducing the ‘premium’ on low floor vehicles which stakeholders report currently exists in both the new and second hand market. By 2034 (12 years following full compliance requirements in the Transport Standards for buses), the majority of buses entering with second hand market will be vehicles that were required to be compliant with the Transport Standards (this cannot be assumed to be 100 per cent given provisions for unjustifiable hardship and other provisions in the Transport Standards which mean 100 per cent compliance cannot be assumed).

The costs of this option are set out in the table below. The estimates are based on a start date of 2029 and a phased implementation to 2044. The estimates are based on:

- The cost ‘premium’ of a low floor bus reducing over time with more of these vehicles entering the market as a result of requirements on route buses under the Transport Standards. It is estimated that this premium decreases from \$80,000 in 2007 to \$10,000 in 2034 (where it remains constant, reflecting the potential that the inclusion of these buses in the second hand market has a price inflation impact). This estimate is based on an average trajectory of asset life, assuming that as current assets a retired, the premium between these vehicles also fall, with more and more accessible buses in the market (as required by the Transport Standards requirements for route bus services).
- A total fleet size of 7200 vehicles, based on data provided by Queensland, Victoria and New South Wales, scaled to a national estimate, and assuming a 10 per cent growth in total vehicles in the period assessed.

The table below shows the potential total cost of this option as \$31 million (Net Present Value in 2012). It is important to note that, given that this analysis involves the phasing out of all old stock (at the end of asset life) as opposed to retrofitting or removing stock from the fleet, it does not factor in loss of capacity. Loss of capacity typically occurs when a conveyance is retrofitted to remove seats to fit in wheelchair spaces. New purchases will be made on the basis of the new stock available, which does not require adjustments to vehicles that would reduce capacity.

Table H.8

COSTS OF PROPOSED PHASED TIMEFRAME FOR REMOVAL OF EXCLUSIONS FOR DEDICATED SCHOOL BUS SERVICES

	2029	2034	2039	2044
Compliance requirement in the Transport Standards	25%	50%	75%	100%
Number of vehicles required to upgrade (assuming 10% growth in vehicles across the period)	1800	1920	2040	2160
Additional cost of accessible bus (compared with standard bus)	\$22,962	\$10,000	\$10,000	\$10,000
Total cost of upgrading to accessible bus (over and above the cost of replacing with a standard bus)	\$41.3 million	\$19.2 million	\$20.4 million	\$21.6 million
Total cost (NPV) in 2012	\$31.9 million			

Note: Discount rate of 5 per cent used for Net Present Value calculation.

Source: ACG analysis based on price, fleet size and age data sourced from submissions and State and Territory governments

The estimates provided above are considered to be the *least cost* approach to including dedicated school bus services in the Transport Standards. The costs are significantly reduced from those first estimated in the 1999 RIS because:

- the compliance timeframe is more gradual, as it would not require buses to be retrofitted, but rather only require providers to ‘trade up’ to an accessible model at the time when they replace their vehicles (when they reach the end of their economic life); and
- the costs of this ‘trade up’ are lower than would be case if the requirement were introduced immediately because the availability of second hand route buses for use as school buses will reduce the cost premium on these models.

The potential benefits of this option are difficult to measure, primarily because, given the long lead time of these requirements, it would require an estimate of the population of students requiring this access from 2029 onwards. It is important to note the potential benefits of this access not just in terms of the number of students, but the length of time that this access will be provided (potentially 12 years per student) and the avoided costs for families of having a directly accessible service. There are no credible estimates on the potential number of students that would access these services, given current difficulties in making these estimates and the timeframe into the future that these estimates would be made.

Chapter 5

Conclusion and recommended option

The impact analysis in chapter 4 presents an option for a staged removal of exclusions for dedicated school bus services in the Transport Standards. The analysis found a total cost of \$31.2m in NPV terms of the removal of the exclusions starting in 2029.

The analysis shows that, while costs of this option can be estimated, the benefits of removing the exclusions are more difficult to measure. This is because benefits will accrue to a future cohort of students and families with children who have mobility impairment, which at this stage is difficult to identify. The analysis does show, however, that there is an approach to removing the exclusions to dedicated school bus services which is consistent with the method used to develop the compliance timeframe in the Transport Standards when they were introduced in 2002. That is, setting a trajectory of compliance which is consistent with vehicle replacement cycles. The option assessed is also consistent with the findings of the RIS for the Transport Standards, which recommended that further assessment be done on including dedicated school bus services on a timeframe consistent with second replacement vehicle cycles (rather than first cycle, which is what was tested in that RIS).

The recommendation of this analysis is that option 2 be progressed on the basis of the cost minimisation approach outlined in Chapter 4. This approach presents the best way forward in terms of allowing the Transport Standards to meet their purpose, while minimising the compliance costs for government and industry.

Chapter 6

Consultation

The analysis in this RIS was conducted on the basis of consultations with stakeholders as part of the five year review of the Transport Standards. Stakeholder consultations for the review involved 15 public hearings, a public submissions process and an opportunity to comment on the Draft report. The following tables provide details on the extent of stakeholder participation in these consultation processes.

6.6 Public hearing locations and participants

Dubbo – 11 July 2007

Table 6.5

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Jessie Goldsmith	Analyst
Attendees	
Merylyn Ward	Break Thru People Solutions
Frank Newman	Break Thru People Solutions
Geoff Ferris	Buslines Group
Mr Neill	Buslines Group
Tanya Moody	NSW Dept of Ageing, Disability and Home Care
Mr Bryan	Dubbo Radio Cabs
Val and Peter Cannon	NA
Sue Gorman	Ideas Inc
Ian Roberts	Dubbo Radio Cabs
Observers	
Christopher Fallon	NA
James McDonell	Westhaven Association
Lindsay Mason	Dubbo City Council
Kym Starr	Department of Transport and Regional Services

Bendigo – 12 July 2007

Table 6.6

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Melissa Skilbeck	Director
Jessie Goldsmith	Analyst
Attendees	
Jim Dunn	Local Client Group Wangaratta
Raelene Dennis	NA
Robert Pascoe	NA
Chris Walters	City of Greater Bendigo
Maureen McMahon	City of Greater Bendigo
Bill Ellson	N/A (Father of Raelene Dennis)
Observers	
Kate Sommerville	Frankston City Council
Bev Watson	Macedon Ranges Shire
Jenny Sitlington	Macedon Ranges Shire
Emilio Savle	Department of Infrastructure
Derek Tarry	Department of Transport and Regional Services

Hobart – 16 July 2007

Table 6.7

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Sharon Kennard	Manager
Attendees	
Tony Sim	Metro Tasmania (Bus)
Jack Lane	Metro Tasmania (Bus)
David Gordon	Tasmanians with disabilities
Geoff Lewis	Tasmanian Bus Association
Shane Dewsbery	Tasmanian Bus Association
Daniel Burnaby	Department of Infrastructure, Energy and Resources
Jan Miller	Tasmanians with disabilities
David Pearce	Glenorchy City Council
Mr Potts	Glenorchy Access Committee
Observers	
Rebecca Thompson	Advocacy Tasmania Inc
James Verrier	Department of Infrastructure, Energy and Resources
Victoria Jubb	Department of Transport and Regional Services

Launceston – 17 July 2007

Table 6.8

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Sharon Kennard	Manager
Attendees	
Karen Frost	Independent Living Centre (Tas) Inc
Mandy Bowden	Tasmanian Acquired Brain Injury Services
Observers	
Victoria Jubb	Department of Transport and Regional Services

Perth 18 – July 2007

Table 6.9

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Leonie Buktenica	Senior Analyst
Attendees	
Greg Madson	Blind Citizens WA
Keith Hayes	Blind Citizens Australia
Erika Webb	Blind Citizens WA
Mike Mulroy	Ministerial Advisory Council on Disability
John Offer	City of Stirling
Mark Hook	WA Local Governments Department
Mark Hutson	Disability Services Commission
Observers	
Graham McClure	Skywest Airlines
Gail Ambrose	Ministerial Advisory Council on Disability
Denise Barr	Skippers Aviation
Alice Haning	Department of Planning and Infrastructure
Michael Kennedy	Department of Planning and Infrastructure
Kym Starr	Department of Transport and Regional Services

Kalgoorlie – 19 July 2007

Table 6.10

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Leonie Buktenica	Senior Analyst
Attendees	
Sheila Hatton	Disability Services Commission
David Foote	NA
Derek Richards	NA
Kylie Pettit	Disability Services Commission
Maxine Lane	Commonwealth Respite, Carelink
Observers	
Kym Starr	Department of Transport and Regional Services

Sydney – 19 July 2007

Table 6.11

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Mary Ann O'Loughlin	Director
Kathleen Forrester	Senior Manager
Attendees	
Digby Hughes	People with Disabilities
Greg Killeen	NA
Simon Darcy	University of Technology, Sydney
Mark Relf	Association for Consultancy and Access Australia
Ann Mason Furnage	Physical Disability Council
Jordana Goodman	Physical Disability Council
Sean Lomas	Spinal Cord Injuries Australia
Observers	
Joanna Nicol	City of Sydney
Ebru Sumaktas	Vision Australia
Jackie Campisi	Waverley Council
Linda Frow	Council of Social Services
Anita Smith	Sutherland Shire Council
Paul Nunmari	National Disability and Carer Ministerial Advisory Council
Ann Chaffey	National Disability and Care Ministerial Advisory Council
Barry Chapman	Blind Citizens Australia
Jane Bryce	Interagency Access Forum
Danielle Hogan	Interagency Access Forum
Desmond Creagh	Guide Dogs NSW/ACT
Tina Woodman	Buslines Group
Peter Simpson	PSE Access Consulting
Richard Langereis	NSW Ministry of Transport
Derek Tarry	Department of Transport and Regional Services

Sydney – 20 July 2007

Table 6.12

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Mary Ann O'Loughlin	Director
Sharon Kennard	Manager
Attendees	
Jane Bryce	Interagency Access Forum
Barry Chapman	Interagency Access Forum
Susan Thompson	Interagency Access Forum
Blair Davies	Australian Taxi Industry Association
John Bowe	Australian Taxi Industry Association
Douglas Herd	Disability Council of NSW
Tina Woodman	Buslines Group
Dinesh Wadiwell	Council of Social Services NSW
Brenda Bailey	Public Interest Advocacy Group
Alexis Goodstone	Public Interest Advocacy Group
Hazel Myers	NA
Observers	
Joanna Nicol	City of Sydney
Ebru Sumaktas	Vision Australia
Jackie Campisi	Waverley Council
Anita Smith	Sutherland Shire Council
Paul Nunmari	National Disability and Carer Ministerial Advisory Council
Ann Chaffey	National Disability and Care Ministerial Advisory Council
Desmond Creagh	Guide Dogs NSW/ACT
Peter Simpson	PSE Access Consulting
Derek Tarry	Department of Transport and Regional Services

Canberra – 26 July 2007

Table 6.13

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Jessie Goldsmith	Analyst
Attendees	
Craig Wallace	Disability Advisory Council
Robert Altamore	Blind Citizens ACT
Nicole Lawder	Deafness Forum
Michael Apps	The Bus Industry Confederation
Peter Moore	International Association of Public Transport
John Stott	International Union of Public Transport
Kylie Maher	People with Disabilities ACT
Margot Hodge	People with Disabilities ACT
Doug Hjort	Transborder Express
Observers	
Kerry Bell	Department of Territory and Municipal Services
Corey Thoresen	Brindabella Airlines
Adrian Beresford-Wylie	Australian Local Government Association
Derek Tarry	Department of Transport and Regional Services
Paul Highmore	Attorney-General's Department

Brisbane – 30 July 2007

Table 6.14

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Melissa Skilbeck	Director
Kathleen Forrester	Senior Manager
Attendees	
Paul Larcombe	Disability Council of Queensland
Nigel Webb	NA
Bernadette Scalora	NA
Tom Savage	Brisbane City Council
Nick Le Mare	Virgin Blue
Mike Thomas	Virgin Blue
Kay MacLean	Regional Disability Council
Ann Langley	Regional Disability Council
Wendy Lavelle	Cerebral Palsy League of Australia
Sally Mills	Queensland Transport
Kirrily Wyford	Spinal Cord Injuries Australia
Elene Athousis	Medical Aids Subsidy Scheme
Fay Forrester	Caloundra City Council
Judith Quirk	Disability Services Queensland
Mike Lollback	Maroochy Shire Council
Observers	
Elizabeth Navratil	NA
Scott Chaseling	Brisbane City Council
John MacPherson	Brisbane City Council
John Deterling	Queensland Rail
Bill Garsden	Transport Lobby Group
Annie Parks	Disability Services Queensland
Victoria Jubb	Department of Transport and Regional Services
Melanie Brocklehurst	Attorney-General's Department

Townsville – 31 July 2007

Table 6.15

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Names	Organisation/Position
Allen Consulting Group Representatives	
Melissa Skilbeck	Director
Kathleen Forrester	Senior Manager
Attendees	
Anita Murray	NA
Max Murray	NA
Cynthia Berthelsen	Gayndah Shire Council
Ross Maxted	Far North Queensland Operators Association and Tropical Horizons
Gordon Dixon	Far North Queensland Operators Association and Down Under Tours
David Downey	Quicksilver Connections
Observers	
Angela O'Keefe	People with MS Qld
Mark Craig	Regional Pacific
Verne Moyle	Corporate Air Services
Victoria Jubb	Department of Transport and Regional Services
Melanie Brocklehurst	Attorney-General's Department

Adelaide – 6 August 2007

Table 6.16

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr Les Trudzik	Director
Tanuja Doss	Senior Analyst
Attendees	
Cath Gunn	Communication Project Group
Maurice Corcoran	Office of Disability and Client Services
Helen Bevan	Office of Disability and Client Services
Tony Starkey	Royal Society of the Blind
Glenda Lee	Physical Disability Council of Australia
Ian Grundy	NA
Ray Scott	Physical Disability Council of SA
David Hitchcock	Local Government Association of SA
Murray Conahan	Local Government Association of SA
Wayne Crabb	Community Accommodation and Respite Agency
David Frick	NA
Observers	
Thomas Eltridge-Smith	South Australian Government Department of Transport, Energy and Infrastructure, Public Transport Division
Trevor Harrison	Harrison Consultants
Jill Fowler	Harrison Consultants
Julie Viney	Harrison Consultants
Paul Burns	TransAdelaide
Jeanette Bath	TransAdelaide
Leanne Davis-King	City of Port Adelaide Enfield
Julian Sowik	City of Unley
Warwick Mehrtens	Department of Transport, Energy and Infrastructure
Grant Drummond	District Council of Ceduna
Chris Triantafyllou	Adelaide Access Taxis
Sam Kenny	City of Charles Sturt
Kym Starr	Department of Transport and Regional Services

Mount Gambier – 7 August 2007

Table 6.17

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr Les Trudzik	Director
Tanuja Doss	Senior Analyst
Attendees	
Russell Peate	District Council of Grant
Chris Nelson	Consultant for Mount Gambier and District Airport
Tracey Gardsenni	Greater City Access
Ole Gardsenni	Greater City Access
Brett Barney	Disability SA
N Ling	NA
Observers	
Grant Humphries	City of Mount Gambier
Kym Starr	Department of Transport and Regional Services

Darwin – 7 August 2007

Table 6.18

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Jessie Goldsmith	Analyst
Attendees	
Joyce Deering	Integrated Disability Action
Bill Kerr	Integrated Disability Action
Tracy McCurrie	Somerville Community Service
Aaron Blasch	Buslink
Terry Morgan	Buslink
Jane Burford	Epilepsy Action Australia
Rhyanwen Bauman	Darwin Legal Community Service
Observers	
Damien Aird	Capiteq Ltd
Greg Scott	Northern Territory Department of Infrastructure
Leila Collins	City of Palmerston Council
Kym Randerson	Down Syndrome Association
Geoff Johnston	Department of Transport and Regional Services

Melbourne – 7 August 2007

Table 6.19

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Melissa Skilbeck	Director
James Green	Analyst
Attendees	
Frank Hall-Bentick	Disability Australia Ltd
Lindsay Donahoo	Sterling Group
Garry Hammer	Wellington Access and Inclusion Group
Francis Ford	Wellington Shire Council
Carla Anderson	Able Australia
Effie Meehan	Unknown Affiliation
Jessica Zammit	Blind Citizens Australia
Samantha Jenkinson	Australian Federation of Disability Organisations
Maurice Corcoran	Australian Federation of Disability Organisations
Brian Kiley	Disability Consulting Access Committee of Ballarat
Observers	
Christiann Astourian	Diversity and Disability
Leah Hobson	Blind Citizens Australia
Ross Coverdale	Araluen
Collette O'Neill	Australian Federation of Disability Organisations
Bob Kellow	Disabled Access Consultancy P/L
Rhonda Joseph	Scope Victoria
Peter Hibbert	Scope Victoria
John McKenna	Travellers' Aid
Andrea Macdonald	Department of Infrastructure
Jim North	Department of Infrastructure
Anna Giannacos	Department of Infrastructure
Emilio Savle	Department of Infrastructure
Margaret Stevens	Victorian Women with Disabilities
Maree Ireland	Action for Community Living
Rhonda James	East Gippsland Shire Council
Janice Florence	ParaQuad Victoria
Chris Sharkey	Metlink Victoria P/L
Felicity Kotsiaris	Metlink Victoria P/L
Grant Cooper	Metlink Victoria P/L
Nick Highfield	Connex

Name	Organisation/Position
Philip Purdy	Yarra Trams
Ingrid Hindell	NA
Heather Forsythe	National Disability and Carer Ministerial Advisory Council
Helen Karatonis	V/Line
Tracy Steiner	Deaf Access Victoria
Trevor Carroll	NA
Jess Fritze	Victorian Council of Social Services
Victoria Jubb	Department of Transport and Regional Services

Melbourne – 8 August 2007

Table 6.20

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Names	Organisation/Position
Allen Consulting Group Representatives	
Melissa Skilbeck	Director
James Green	Analyst
Attendees	
Leah Hobson	Blind Citizens Australia
Alyena Mohummadally	Blind Citizens Australia
Jeanette Lee	Yooralla
Mary Vella	Yooralla
Kate Colvin	Victorian Council of Social Services
Maree Kelly	Victorian Council of Social Services
Observers	
Christiann Astourian	Diversity and Disability
Ross Coverdale	Araluen
Collette O'Neill	Australian Federation of Disability Organisations
Bob Kellow	Disabled Access Consultancy P/L
Rhonda Joseph	Scope Victoria
Peter Hibbert	Scope Victoria
John McKenna	Travellers' Aid
Andrea Macdonald	Department of Infrastructure
Jim North	Department of Infrastructure
Anna Giannacos	Department of Infrastructure
Emilio Savle	Department of Infrastructure
Margaret Stevens	Victorian Women with Disabilities
Maree Ireland	Action for Community Living
Rhonda James	East Gippsland Shire Council

Janice Florence	ParaQuad Victoria
Chris Sharkey	Metlink Victoria P/L
Felicity Kotsiaris	Metlink Victoria P/L
Grant Cooper	Metlink Victoria P/L
Nick Highfield	Connex
Philip Purdy	Yarra Trams
Ingrid Hindell	NA
Lindsay Donahoo	Sterling Group
Heather Forsythe	National Disability and Carer Ministerial Advisory Council
Helen Karatonis	V/Line
Tracy Steiner	Deaf Access Victoria
Trevor Carroll	NA
Jess Fritze	Victorian Council of Social Services
Kym Starr	Department of Transport and Regional Services

Alice Springs – 8 August 2007

Table 6.21

REPRESENTATIVES, ATTENDEES (IN ORDER OF SPEAKING) AND OBSERVERS

Name	Organisation/Position
Allen Consulting Group Representatives	
Dr John Bell	Associate Director
Jessie Goldsmith	Analyst
Attendees	
Cliff Alexander	Disability Advocacy Service
Lindy Cameron	Central Australia Support Accommodation
Barry Sams	Central Australia Support Accommodation
Michelle Castagna	Disability Services Liaison
Paul Barreau	Alice Springs Town Council
Gerard Waterford	Central Australian Aboriginal Congress
Katrina Whan	Steps Disability Employment
Karen Edwards	Steps Disability Employment
Le Hi Archibald	Buslink
Observers	
Marriane Langford	Acacia Hill School
Heidi Seidler	Australian Red Cross
Geoff Johnston	Department of Transport and Regional Services

6.7 Individual meetings

Table 6.22

INDIVIDUAL MEETINGS

Date	Location	Organisation
6/8/2007	Adelaide	South Australian Government Department of Transport, Energy and Infrastructure, Public Transport Division
8/8/2007	Darwin	Northern Territory Department of Infrastructure
17/8/2007	Sydney	HREOC
17/8/2007	Sydney	New South Wales Ministry of Transport
7/9/2007	Melbourne	Victorian Government Department of Infrastructure

6.8 Written submissions

Table 6.23

WRITTEN SUBMISSIONS RECEIVED (AS AT OCTOBER 5 2007)

No.	Date received	Submitting organisation/individual	Confidential?
1		Alex Naughton-Smtih	No
2		Helen Dare	No
3		Spinal Injuries Association	No
4		Short Statured Peoples Association (WA Branch)	No
5		Royal Blind Society	No
6		Australian Airports Association	No
7		Access for All Alliance (Hard copy)	No
8		City of Stirling	Yes
9		Sally Eves	No
10	07/08/2007	Deafness Forum of Australia	No
11	14/08/2007	Australian Federation of Disability Organisations	No
12	17/08/2007	Blind Citizens Australia	No
13	17/08/2007	Ashfield Access Committee	No
14	21/08/2007	Wellington Shire Council	No
15	22/08/2007	Allen Ringland	No
16	22/08/2007	District Council of Grant (Hard copy)	No
17	22/08/2007	Australasian Rail Association	No
18	22/08/2007	Margo Hodge	No
19	22/08/2007	Association for the Blind WA	No
20	23/08/2007	Joint Industry Response — Australasian Rail Association, Australian Taxi Industry Association, International Association of Public transport (UITP), Bus Industry Confederation of Australia.	No
21	23/08/2007	Rob Pyne	No
22	23/08/2007	City of Onkaparinga	No
23	23/08/2007	South West Advocacy Association	No
24	23/08/2007	East Gippsland Transport Working Group	No
25	23/08/2007	Disability Discrimination Legal Centre (NSW)	No
26	23/08/2007	Local Government Association of NSW and Shires Association of NSW	No
27	23/08/2007	Queenslanders with Disability Network	No
28	23/08/2007	Australian Local Government Association	No
29	23/08/2007	People with Disability Australia	No
30	24/08/2007	Western Australian Local Government Association	No
31	20/08/2007	Hazel Myers	No

32	24/08/2007	Vision Australia	No
33	24/08/2007	Tasmanian Government	Yes
34	24/08/2007	Yarra Trams	No
35	24/08/2007	Regional Aviation Association of Australia	No
36	24/08/2007	South Australian Government	Yes
37	24/08/2007	Cairns Community Legal Centre	No
38	24/08/2007	Physical Disability Council of NSW	No
39	24/08/2007	Disability Australian Limited	No
40	24/08/2007	Anti-Discrimination Commission Queensland	No
41	24/08/2007	Public Transport Authority of WA	No
42	24/08/2007	David Frick	No
43	24/08/2007	Far North Queensland Tour Operators Association	No
44	24/08/2007	Kingsford Legal Centre	No
45	24/08/2007	Greg Killeen	Yes
46	24/08/2007	Local Government Association of South Australia	No
47	24/08/2007	Age Friendly Bus Project – University of Queensland	No
48	24/08/2007	Qantas	No
49	24/08/2007	Inter-agency Access Forum	No
50	24/08/2007	Queensland Department of Transport	No
51	24/08/2007	Australian Taxi Industry Association	No
52	24/08/2007	Local Government Association of Queensland	No
53	24/08/2007	Guide Dogs NSW/ACT	No
54	24/08/2007	Allergy and Environmental Sensitivity Support and Research Association	Yes
55	24/08/2007	Hervey Bay City Council	Yes
56	24/08/2007	Southern Sydney Regional Organisation of Councils (SSROC) Access Forum	No
57	24/08/2007	Holroyd City Council	No
58	24/08/2007	Victorian Equal Opportunity and Human Rights Commission	No
59	24/08/2007	Yooralla	No
60	24/08/2007	Inner West Community Transport	No
61	24/08/2007	Newcastle City Council	No
62	24/08/2007	Hilary Rumley	No
63	24/08/2007	Public Interest Advocacy Centre	No
64	25/08/2007	ParaQuad NSW	Yes
65	27/08/2007	Regional Express	Yes
66	27/08/2007	Joint submission – People with Disabilities WA, Ministerial Advisory Council on Disabilities, Disability Services Commission of Western Australia	No
67	27/08/2007	Epilepsy Action Australia	No
68	27/08/2007	Victorian Council of Social Service	No

69	28/08/2007	John Clarke	Yes
70	29/08/2007	Northern Rivers Social Development Council	No
71	30/08/2007	Victorian Government Department of Infrastructure	No
72	31/08/2007	National Ethnic Disability Alliance	No
73	04/09/2007	New South Wale Bus and Coach Association	No
74	04/09/2007	Peter Simpson	No
75	06/09/2007	Disability Services Queensland	No
76	11/09/2007	Spinal Cord Injuries Australia	No
77	07/09/2007	Human Rights Commission ACT	No
78	03/09/2007	Max Murray	No
79	06/09/2007	National Council on Intellectual Disability	No
80	14/09/2007	Physical Disability Council of Australia	No
81	14/09/2007	Western Australian Department of Planning and Infrastructure	No
82	14/09/2007	Council for Social Services of New South Wales	No
83	14/09/2007	VirginBlue	No
84	14/09/2007	Alan Ringland (second submission)	No
85	14/09/2007	Australian Taxi Industry Association (second submission)	No
86	14/09/2007	National Disability Services Queensland	No
87	14/09/2007	Bus Industry Confederation	No
88	14/09/2007	Association of Consultants in Access Australia	No
89	17/09/2007	ACT Government	No
90	20/09/2007	NSW Government	No
91	25/09/2007	NT Government	No
92	23/09/2007	Simon Darcy	No
93	27/09/2007	Penrith City Council	No

6.9 Submissions received on the Draft Report

Figure 6.1

WRITTEN COMMENTS ON DRAFT REPORT

No.	Date received	Submitting organisation/individual	Confidential?
DR1	24/01/2008	William Hunter	No
DR2	03/02/2008	Alan Ringland	No
DR3	19/02/2008	ParaQuad Victoria	No
DR4	20/03/2008	Dr Lindy Gulland	No
DR5	27/03/2008	Institute of Public Works Engineering Australia	No
DR6	27/03/2008	East Gippsland Shire Council	No
DR7	27/03/2008	NCOSS	No
DR8	28/03/2008	Parramatta City Council	No
DR9	28/03/2008	Victorian Local Government Disability Planners Network	No
DR10	28/03/2008	Outdoor Media Association	No
DR11	31/03/2008	National Ethnic Disability Alliance	No
DR12	31/03/2008	Age Friendly Buses Project, University of Queensland	No
DR13	31/03/2008	Independent Living Centre NSW	No
DR14	31/03/2008	Virgin Blue	No
DR15	31/03/2008	Sutherland Shire Council	No
DR16	31/03/2008	WA Disability Services Commission	No
DR17	14/04/2008	Australian Federation of Disability Organisations — AMENDED	No
DR18	31/03/2008	Newcastle City Council	No
DR19	31/03/2008	Human Rights Commission ACT	No

DR20	31/03/2008	Bus Industry Confederation	No
DR21	31/03/2008	Municipal Association of Victoria	No
DR22	31/03/2008	Greg Killeen	Yes
DR23	31/03/2008	Australian Local Government Association	No
DR24	31/03/2008	Local Government Association of SA	No
DR25	31/03/2008	LINK Community Transport	No
DR26	31/03/2008	Glen Ford	No
DR27	31/03/2008	Blind Citizens Australia	No
DR28	31/03/2008	SCI Australia	No
DR29	31/03/2008	Interagency Access Forum	No
DR30	31/03/2008	Wellington Shire Council	No
DR31	31/03/2008	Australasian Rail Association	No
DR32	31/03/2008	Australian Taxi Industry Association	No
DR33	31/03/2008	Western Sydney Regional Organisation of Councils Ltd	No
DR34	31/03/2008	Kay Maclean	No
DR35	31/03/2008	Deaf Access Victoria	No
DR36	31/03/2008	Yarra Trams	No
DR37	31/03/2008	NSW Government	No
DR38	31/03/2008	Sydney Legacy	No
DR39	19/03/2008	People With Disabilities ACT	No
DR40	30/01/2008	Penrith Photo-Voice Project	No
DR41	10/03/2008	Hobson Bay City Council	No
DR42	31/03/2008	UnitingCare Community Options	No
DR43	14/04/2008	Victorian Equal Opportunities and Human Rights Commission	No
DR44	10/04/2008	Public Interest Advocacy Centre	No
DR45	09/04/2008	Qantas Airways Limited	No
DR46	09/04/2008	People With Disabilities (WA)	No
DR47	08/04/2008	NSW Disability Discrimination Legal Centre	No
DR48	08/04/2008	Physical Disability Council of NSW	No
DR49	18/04/2008	Queensland Department of Transport	No
DR50	16/04/2008	Tasmanian Department of Infrastructure, Energy and Resources	Yes
DR51	10/04/2008	West Australian Department for Planning and Infrastructure	No
DR52	02/04/2008	Northern Territory Government	No
DR53	22/04/2008	South Australian Government	No
DR54	06/05/2008	Victorian Department of Infrastructure, Public Transport Division	No