

Australian Taxi Drivers Association

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The only taxi driver's association that works.....

Comments on Draft Minimum Specifications for Taxi Security Systems

For the most part these draft standards are sensible and acceptable, and fully implemented will assist the security of taxis in NSW. They do not address that which should be the real issue - the safety and security of taxi drivers.

To the extent that it is the driver with whom concern as to his occupational safety and security is a prime consideration of the Australian Taxi Drivers Association, this draft is an inadequate and partial solution.

It is most at fault in that which is omitted, rather than the immediate content, and the extent to which it relies on work done in Victoria, without local initiatives, says very little about the capacities of the NSW Ministry of Transport.

It is no doubt of considerable comfort for a taxi driver to be assured that his murderer will be apprehended, and probably be imprisoned for at least a short period of time. Should he be assaulted and seriously injured, there is a moderate chance that the assailant will be caught, but not much chance of his imprisonment. Should he merely be assaulted or robbed ... tough!!

In the vast majorities of instances of abuse and or fare evasions by passengers, (matters which occur with alarming frequency,) nothing in these standards will make a difference.

The issues raised in the recent Madden Report, of the Taxi Safety Task Force, demonstrated clearly the extent of violence against taxi drivers, and the risks , perceived or real that they face on a daily basis. A taxi security system must address all the issues related to taxi driving, and not just the narrow focus of this draft. One major point is that many assaults, and one of the two last murders, take and took place outside the cab.

Just whose safety is the system designed to protect - taxi or taxi driver ???

A major failing in these specifications is the total omission of what is to be done with the recordings and the actions to be taken in the event of an alarm alert on camera or through the duress alarm. These are specifications for the technical aspects of the system, and are but one aspect of the system.

The current specifications at least make provisions for downloading. Now the authorised networks are spared that obligation.

Particular Issues

System Power

11. Should be operational at all times the vehicle is being driven and for at least a set time after "ignition off":

12. Issues of diesel vehicles (e.g. Lime) with a kill switch unrelated to ignition.

14. Does this mean that during a long trip the cameras cease recording. Interface

19. issues of not recording with "ignition off"

Installation

23. Precludes use of miniature / pin hole cameras - already advise as to camera presence. Issue of ease of interference and blocking of view by pax

24. What about the view of a weapon or threatened weapon below shoulder height

25. how are external cameras triggered, and issues of external view whilst taxi in motion. What will cause images to be recorded of an approaching pax before a trigger event.

30. floor alarm location is of concern as the area is already limited for driver comfort. Needs more consideration.

Image Recording

34. on a 20 hour per day usage plus trigger events, 20,000 images will be recorded in 5 days before overwriting

39. No details as to frequency of imaging in "alarm" mode.
No details as to camera sequencing from multiple camera heads.

Image Appearance

46. AS 4806.2 is not publicly available, but there is confusion as to recognition and identification.

47. 360 pixels per meter needs to be represented by an example, to confirm just what definition/ resolution this means. Research at this stage would indicate this is not sufficient.

51. Previous specifications called for image quality in zero visible light, now it is low ambient light.

57.the issue should be encryption of images not extraction or copying. The objective should be for ease of retrieval by any person for an authorised purpose, and to restrict display by encryption.

Self Test & Alarms

60.The use by a driver of any taxi in which a camera fault or memory lock condition is present must be proscribed by Regulation. A monetary penalty should apply on the operator who permits use of a taxi in such conditions.

MDT not defined"

or" should be "and"

Vehicle Tracking Device

61.All taxis should be required to have a vehicle tracking device.

62.The requirement for a odometer pulse connection presupposes a hard wired installation and not a more readily available mobile connection.

64. No comment as to how a alarm is negated, and under what circumstances.

65.No comment on all the ancillary and consequential requirements of "audio listen in"

68.No provision for system of on-forwarding duress tracking information to Police etc

The issues not addressed.

It may well be the intention of the Ministry to proscribe a mandatory action plan or sequence in the event of an alarm; but now is the time to do it.

The existence of such a document as this draft is misleading because it appears to ignore all the consequential requirements of how the system operates, and most of the recommendations of the Madden Report.

At least in the previous specifications there were clauses relating to the transmission of images, and for twenty-four hour download facilities, and for a mobile facility.

Just what has caused the absolute about face in the Ministry about the requirements previously to facilitate image retrieval without permitting manipulation and by using encryption. Last time it was a good idea that images properly recovered should be able to be printed on standard printers in standard format. Now all "generic" computers cannot display any images or files.

If one steps on a Government Bus, you can see yourself in living color, and any mobile phone can snap the image

These are minimum specifications, and there is no reason for an operator not to install something better, by way of continuous imaging, in color or with better resolution and definition. But nor is there any detail of an authorization process.

The Regulations provide that an Authorised Network (at least in the Metropolitan area) must ensure that taxis are fitted with a compliant camera system, and also that an Operator must ensure that a camera system is fitted. Curiously, nowhere are there provisions or penalties to require that the system is functional. There is a penalty for interference such as may impede the proper working, but nothing to ensure that it works.

Previously the specifications for Tracking Devices covered testing, recording of all data and all alarms by the Network. Now no such imposition or requirement.

It is the view of the ATDA that a Taxi Security System must relate to all the issues of a taxi, and of a taxi driver's safety. What the Ministry proposes falls far short of that objective.

The proposed Clause 57 provides that images or files cannot be displayed, copied or extracted by generic business or home computers. In one fell swoop the suggestions of drivers, taken up in the Madden Report, for in-car display of the live images as a preventative measure is proscribed. Certainly there needs to be data encryption such that personal privacy is protected from unauthorized use of images - and the Passenger Transport Regulations already do just that, but now, through a minor clause, the progress of driver safety is blocked.

Nothing in these specifications cover the problems faced by a driver outside the taxi - where so many of the incidents occur. Now would be a good time to specify a personal duress alarm, such as our fellow drivers in Western Australia have incorporated into a mobile *eftpos* device.

Again, are we seeking to protect the taxi driver or the taxi ?

Another issue of omission is that of audio reporting and recording. To the best of our knowledge there are no regulatory provisions which authorize audio recording of drivers and or passengers. There is generally a sticker advice that recording may be made (on the passenger window) - but is that legal ? There

is mention in the specifications of a minimum 30 second "listen-in" monitoring by the network, presumably in the event of a duress alarm, but no mention of recording the same.

Our greatest concern is to the purpose and use of camera , and of voice recordings. Not in this document is there mention of the intent or purpose of making recordings. Elsewhere there have been provisions that the downloading of images be for "serious" incidents.

Fare evasions, and robberies without violence are "not serious". Malicious or even negligent damages to a taxi cab are not downloadable events. Nor is the request of a driver to determine whether or not he was talking on a mobile phone such an event. But all those are actionable offences which elsewhere are provided, in the Regulations, as authorised purposes.

And the Regulations , as amended in 2007, say nothing about an authorised person being the only one able to download images, but that use of a video recording only be done by a person for an authorised purpose.

The ATDA wants drivers and passengers to be able to use recordings for authorised purposes as provided for in the Regulations, and not for a misdirection to occur by way of these flawed Taxi Security Specifications.

We intend to publish these comments on our website, in reply to the public posting by the Ministry on its website. We will also republish the suggestions attached to the Madden Report made by us over a year ago, and which appear to have been studiously avoided and ignored

Michael Jools
President ATDA
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