

WPHA

WALSALL PRIVATE HIRE ASSOCIATIONS

85 BANNERSGATE Road

Sutton Coldfield

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21st September 2012

Dear Chair and Members

Re: Recommendations for amendments to the Taxi Private Hire And Hackney License Conditions

In respect of the proposed recommendations we would like the Committee to consider amending the following conditions:

Under Section 1.7 of the Hackney Carriage License it requests that a driver supply on demand to a Police Officer or Enforcement officer their Insurance Certificate. We suggest it is neither reasonable nor just to do this as most drivers do not carry this information with them, a 7 day rule would be far more applicable

Under section 1.14 the condition states that should a cancellation of the MOT be made later than 5 working days prior to the booking then the £25 deposit will offset against the booking fee. This condition is unfair and has significant financial restraints on drivers as cars are unpredictable and could potentially break down on the morning of the test. This in turn puts a further financial burden on the driver.

Section 1.16 the conditions state that the vehicle must be inspected every 4 months but we propose that this test be carried out every 6 months.

Section 1.17 – we would ask that this condition be extended to 14 days which would allow for any issues that may arise regarding insuring of the vehicle. If there was an issue on Thursday and nothing could be arranged until the following week then the driver potentially has to repay the fee of the 5 days have lapsed.

Section 1.39 – Tinted windows. The legal requirement from VOSA states the following:
Any glass behind the two pillars which hold up the vehicle at the back of the front doors (ie not the windscreen or front door windows) can be of any light permeation, In fact they could

indeed be painted, as there is no regulation preventing this. See attached VOSA regulations attached.

Section 1.12 Age restrictions. For replacement vehicles it should be noted that as long as the vehicles newer than the previous vehicles age then they shouldn't have to reapply for licensing on the newer vehicle as the license has already been granted for an older model in the 1st instance.

There are no issues regarding the safety of passengers and in accordance to the current condition there is a contradiction in terms when it suggests that a vehicle that has been tinted at manufacturing can be licensed but that if a vehicle has them done at a latter date they won't.

Yours Sincerely

Mr K Hussain

Chair