

Regulatory Consultation Report

Small Public Service Vehicle (Cashless Payment Facility) Regulations



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1 Introduction

1.1 NTA and Regulatory Function

The National Transport Authority (NTA) is responsible for regulation of the small public service vehicle (SPSV) industry in Ireland. As of 30 April 2022, the Small Public Service Vehicle (SPSV) fleet comprised 22,155 taxis, hackneys and limousines in active and inactive licence status.

Under section 20 and section 48 of the Taxi Regulation Act 2013 (No. 37 of 2013), the Authority proposes to make regulations that will require drivers of taxis to carry a Payment Card industry (PCI) compliant functioning cashless payment facility whilst operating and to accept cashless payments for any journey. These regulations will also be declared as Fixed Payment Notice offences.

1.2 Small Public Service Vehicle (Cashless Payment Facility) Regulations

This proposal for a cashless payment facility regulation concerns only the fleet of taxis in Ireland, which makes up 84 per cent of the total SPSV fleet. Hackneys and limousines are excluded from this proposal being pre-booked vehicles, where payment can be made prior to the journey as the fares are agreed in advance rather than calculated in real time on a taximeter.

Providing cashless payment options in each taxi aligns with Government policy as set out in the National Payments Plan 2013 and aligns with the actions or stated intent of most taxi drivers in recent years but particularly strongly since the advent of Covid-19.

KPMG Future Analytics was commissioned by NTA to undertake review of suitable cashless payment technology offerings in the Irish Market. The assessment focused particularly on taxis and their acceptance and integration of this technology, leading payments systems currently available in the Irish market and a review of comparable features offered. This report was provided to the Board in the April board pack. The full report includes details of the main cashless payment facilities currently available in Ireland, the associated transaction fees for each, and various other details relevant to the procurement and use of such facilities.

The cashless payment experience is more critical now than ever, as consumers consciously choose where to shop based on how they can pay. The payment sector was undergoing an evolution prior to the Covid-19 pandemic, and the sector's development post-pandemic is likely to see these trends accelerated. Over the last decade, card and other cashless transactions have become much more

prominent as a form of payment across a wide variety of sectors, and the Covid-19 pandemic has played a recent and significant role in customer preference when it comes to payment options.

It is recognised that accepting cashless payments is the norm for most service industries and an increasingly preferred method of payment in Ireland. NTA encourages SPSV operators to provide the widest and best service for passengers in all areas including fare payment facilities.

2 Background

2.1 Legal basis

Unlike some analogous jurisdictions, there is no Irish SPSV regulation surrounding forms of payment which must be accepted by drivers for taxi journeys.

NTA has responsibility for the regulation of the SPSV industry, which includes the regulation of the methods of payment of fares, including in-taxi cashless payment acceptance, under the powers set out at section 20 of the Taxi Regulation Act 2013:

“(1) The Authority may make regulations, to be known in this Act as small public service vehicle regulations (“SPSV regulations”) in relation to the following:

(j) the regulation of the duties of a driver of a small public service vehicle, to provide for all or any of the following: [...]

(via) methods of payment of fares;”

NTA is proposing to make in-taxi cashless payment facilities mandatory. Each passenger may avail of those facilities or pay cash as desired.

As with any card payment facility in Ireland, the device provided must be PCI compliant. The Payment Card Industry Data Security Standard (PCI DSS) is a set of security standards designed to ensure that all companies that accept, process, store or transmit credit card information maintain a secure environment. The PCI DSS applies to any organization, regardless of size or number of transactions, that accepts, transmits or stores any cardholder data. This information is set out in the draft guidelines which are associated with this proposed regulation.

The consistency and proportionality of these regulations are positive for both the public and the driver. They are necessary as there is currently no effective method of encouraging compliance by that proportion of drivers who refuse passengers on the basis of cash only payments being accepted and there is little NTA can do to follow through on passenger complaints in this regard. This impacts the compliant professional driver and the reputation of the industry. As these regulations are proposed to be declared as fixed payment offences, for which a fixed payment notice is issued, any driver can choose to have the matter heard in the District Court for a third party judgement rather than paying the fine.

2.2 Current environment

The most recent taxi driver surveys (February 2022) indicate that 92% of drivers already offer a cashless payment option, 5% confirm that they intend to offer same in the coming months and 3% state that they do not wish to offer a cashless option at all (mainly citing the associated requirement to hold a bank account, a fear of technology, concerns over insufficient funds/inability to pay by a passenger and technology/connectivity failure as the reasons).

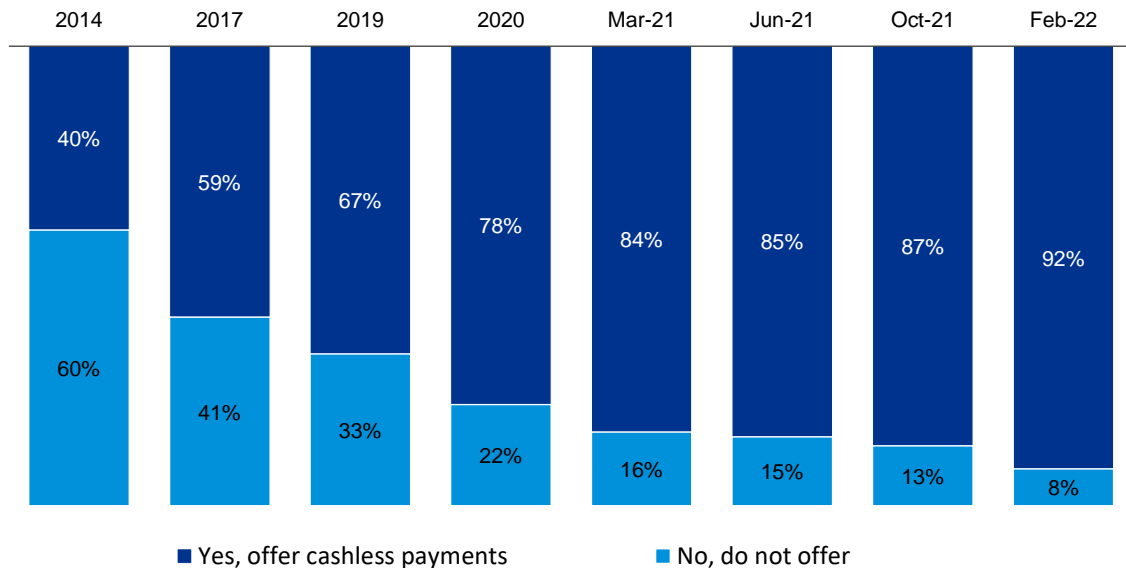
However, much anecdotal, mainstream and social media evidence, together with complaints received by the NTA indicate that whilst a card machine / point of sale terminal is often present in a taxi, drivers continue to refuse to offer same as payment options (broken, out of charge, etc.), requesting cash or refusing to take passengers. In 2021, 12% of all taxi passenger complaints received by NTA related to a refusal to take a card payment for a journey. In Q1 2022 that had risen to 15%. Outright refusals to take non-cash paying customers numbered 6 in all 2021 but to the end of May this year had reached 11.

3 Industry & Consumer Research

Throughout the course of the Covid-19 pandemic the NTA ran an iterative study which looked at the impacts the pandemic has had on taxi drivers and customers. This study sought to understand the immediate impacts that Covid-19 was having on the industry and the potential future and longer-term impacts arising, while also incorporating questions on driver and customer views of cashless payments.

3.1.1 Driver Perspective

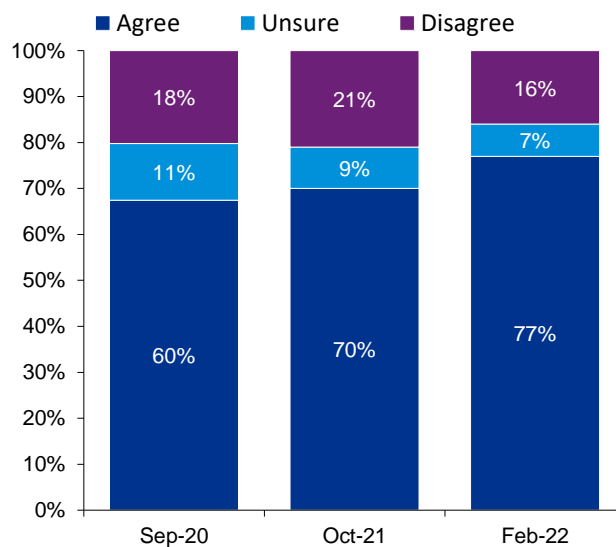
Over the last number of years there has been a substantial increase in the proportion of drivers offering cashless payment options. As shown below, the most recent results indicate that over 90% of drivers are offering this payment option. This is reflective of the wider consumer trend of card and cashless payment becoming the preferred payment option.



Proportion of Drivers offering Cashless payment options, NTA Feb 2022

In February 2022, 77% of drivers agreed that customers want to pay with cards rather than cash.

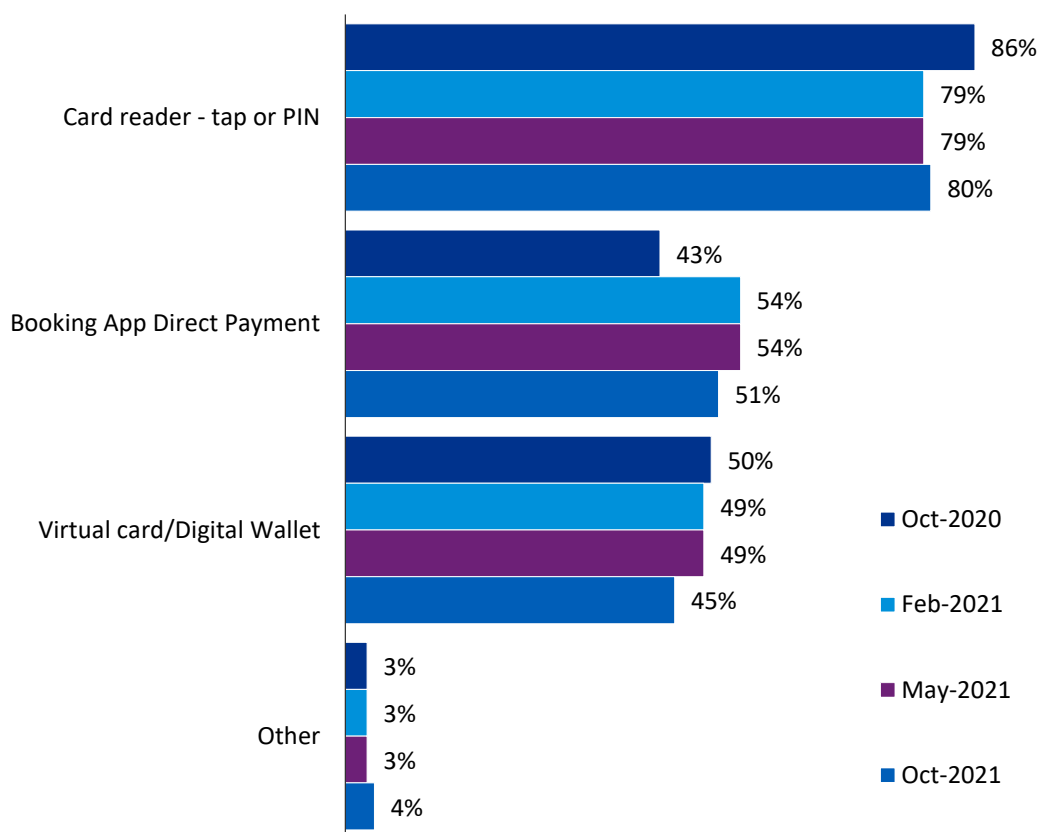
Most customers now want to pay with cards for journeys



Driver Perceptions NTA 2022

3.1.2 Passenger Perspective

Passenger/Customer sentiment leads heavily towards the necessity of having a card reader available within taxis (~80%), with other cashless payment options being of less importance but still seen as an appropriate offering within the service.



Customer opinion of payment methods, NTA October 2021

In February 2022, 88% of consumers surveyed advised that payment by card through the use of a terminal available in taxi should be the additional payment option.

In summary, the vast majority of consumers agree that there should be the option to pay by card through the use of a card terminal. They also concur, to smaller degrees that other cashless payment options should be available, but the ubiquitous card terminal is the preferential option. This is true for all age groups, with the older generation (65+) being the most keen on this option (86%). This is likely due to the ease of use and accessibility offered by the card terminal and contactless card payments compared to the increased technical knowledge needed to access smartphone apps and digital wallets.

4 Consultation Overview

On 25 April 2022, the NTA published the proposed Small Public Service Vehicle (Cashless Payment Facility) Regulations, together with the Cashless Payment Market Research Report 2022 and an associated factsheet, on both the NTA (industry) and Transport for Ireland (public facing) websites. Also on that day, a text message was issued to 17,728 licence holders for whom we have mobile telephone numbers, and an email to 23,775 SPSV licence holders notifying them of the public consultation. Newspaper advertisements were also placed in the Independent and Examiner newspapers and their online platforms. Good media coverage was experienced in the following days.

Representations on the proposed Small Public Service Vehicle (Cashless Payment Facility) Regulations were invited from any interested parties via online form or by post. Email was also accepted. The period of the consultation ran from 25th April 2022 to 27th May 2022 inclusive. NTA consulted directly with the Advisory Committee on SPSVs, An Garda Síochána and the Department of Transport.

The proposed Small Public Service Vehicle (Cashless Payment Facility) Regulations and consultation process was announced to industry members by newsletter, text and/or email on the following dates:

21 February	01 March	10 March	11 March
25 April	16 May	18 May	25 May

A total of 555 submissions were received during the consultation process. All submissions received have been referenced in this report.

Submissions were received via an online CiviQ survey platform published by NTA on its website, by post and by email. The online form contained the following fields:

- Data Privacy Statement (Agreement required to proceed)
- Your Interest
- Full Name
- Email Address
- Opinion on Cashless Payment Facility Regulations
 - Agree
 - Disagree
 - Unsure/no clear position
- Additional Commentary (optional)

Online Submission Form - Example

Data Privacy Statement



Please indicate that you agree with the [NTA Public Consultation Privacy Statement](#) and [CiviQ Consultation Statement of Privacy](#). If you require further information please contact privacy@nationaltransport.ie.

I agree

Your interest *

Please enter your interest from the list below

- Member of Public / Non-Industry Member
- Taxi Driver / Owner
- Taxi Industry Representative
- Other

Other (please specify)

Full Name *

Please enter your email address *

Please re-enter your e-mail *

Email addresses may only be used once to make a submission

Cashless Payment Facility Regulations



Your opinion *

- I agree with the proposed Cashless Payment Facility Regulations
- I disagree with the proposed Cashless Payment Facility Regulations
- Unsure / no clear position

Additional commentary (optional)

Please note, due to the large volume of submissions received by NTA, only commentary directly related to the proposal will be considered.

Content limited to 300 characters, remaining: 300

4.1 Reporting

The CiviQ online platform was utilised by the majority of the respondents. The following actions were completed following the closure of the consultation:

Data cleansing

Data cleansing was undertaken to remove duplicate submissions and test submissions made by the NTA.

Data coding

All submissions were read, interpreted and categorised against the trends and themes that emerged. In a number of cases, respondents' comments contained more than one theme and for these submissions, multiple themes were assigned to the submission.

Reasonable endeavours were made to ensure consistency in the application of themes including a quality review of a sample of analysed responses, but it is noted that while most respondents were reasonably clear in presenting their views, some submissions did contain a degree of ambiguity.

5 Submissions

Introduction

A total of 555 submissions were received to the public consultation on the proposed Small Public Service Vehicle (Cashless Payment Facility) Regulations. This total includes those submissions where the opinion selected was '*Unsure/no clear position*' but contained additional commentary nonetheless.

Interest	Number of Respondents
Taxi Driver / Owner	350
Member of Public / Non Industry Member	182
Other	20
Taxi Industry Representative	3
Total	555

The majority of respondents (58%; n=322) agreed with the proposed Small Public Service Vehicle (Cashless Payment Facility) Regulations; 39% (n=217) disagreed with the proposal; and a small

number of respondents were unsure or had no clear position (6%, n=16) but added additional commentary and so have been included.

Opinion	Number of Respondents	% of Respondents
Agree	322	58%
Disagree	217	39%
Unsure / no clear position	16	3%
Total	555	100%

Key Themes

The table below illustrates the themes and trends raised by the 213 respondents who provided additional comments. A number of respondents included multiple matters in their additional commentary.

Proposed Cashless Payment Facility Regulations				
Themes/Additional Commentary	Agree	Disagree	Unsure/No Clear Position	Total
Issues with internet coverage/facility	1	26	3	30
Should be the norm in 2022/long overdue	29	0	0	29
Respondent (driver) does not want to pay transaction fees	5	15	3	23
Respondent (driver) currently accepts cashless payment	11	5	4	20
Cashless is customer preference/cashless more popular	17	1	0	18
Concerns around insufficient funds	1	13	1	15
No cashless option has impact on passenger safety	11	0	0	11
Enforcement required/agree with enforcement	9	0	0	9
Driver safety/beneficial to drivers	8	0	0	8
Disagree with penalties/reduce penalties	2	5	0	7
Customers believe drivers have a preference for cash jobs	6	0	0	6
Driver age/issues using technology	0	5	3	8
Concerns around fraud/stolen cards being used	0	6	0	6
Expense to driver not catered for	0	6	0	6
Increase enforcement/increase penalties	4	0	0	4
Reduction in tips/rounding up fares	0	5	0	5

Key Themes by Interest

The table below illustrates the themes and trends raised by all respondents and their interest, from the 213 respondents who provided additional comments.

Proposed Cashless Payment Facility Regulations					
Themes/Additional Commentary	Industry Member	Consumer	Industry Rep	Other	Count
Issues with internet coverage/facility	26	2	2	0	30
Should be the norm in 2022/long overdue	9	17	0	3	29
Respondent (driver) does not want to pay transaction fees	17	4	2	0	23
Respondent (driver) currently accepts cashless payment	20	0	0	0	20
Cashless is customer preference/cashless more popular	5	8	0	5	18
Concerns around insufficient funds	12	2	1	0	15
No cashless option has impact on passenger safety	0	10	0	1	11
Enforcement required/agree with enforcement	1	8	0	0	9
Driver safety/beneficial to drivers	2	3	0	3	8
Misunderstanding of proposal: cashless in addition to cash	5	2	0	1	8
Disagree with penalties/reduce penalties	6	1	0	0	7
Customers believe drivers have a preference for cash jobs	0	6	0	0	6
Driver age/issues using technology	5	1	2	0	8
Concerns around fraud/stolen cards being used	5	1	0	0	6
Expense to driver	4	2	0	0	6
Increase enforcement/increase penalties	0	4	0	0	4
Reduction in tips/rounding up fares	4	0	1	0	5

Key Themes – Unsure / No Clear Position

Unsure/No Clear Position Respondent Themes	
Themes/Additional Commentary	Unsure/No Clear Position
Issues with internet coverage/facility	3
Respondent (driver) does not want to pay transaction fees	3
Respondent (driver) currently accepts cashless payment	4
Concerns around insufficient funds	1
Misunderstanding of proposal: cashless in addition to cash	2
Driver age/issues using technology	3

The key themes raised by those who disagreed with the proposal cited concerns with internet coverage or the reliability of a cashless payment facility (26).

The second most common theme from disagreeing respondents related to transaction fees (15) with some stating they believed these should be passed to the passenger directly which has not been permissible at law for personal payment cards since the introduction of the EU PSD2 Directive on 18 January 2018. It also appears there may have been a lack of appreciation of the 1% addition to the

proposed maximum taxi fare increase for the costs incurred by operators across all fares to cater for such costs and a misunderstanding of the level of transaction fees currently marketed by payment processors despite the research provided.

Concerns around insufficient funds was a key theme for those respondents who disagreed with the proposal (13), although the same issue arises with passengers having insufficient cash to pay. Drivers are entitled to request intending passengers provide proof of payment ability and/or pay a reasonable deposit before commencing a journey.

Each of the key concerns raised has been catered for in the guidelines associated with these proposed regulations, now produced following this feedback. The Advisory Committee on SPSVs will be asked to review the guidelines prior to promulgation of any regulation in this regard.

5.1 Submissions: Agency, Group/Organisation, and Industry Representatives

5.1.1 Submissions from State Agencies

A summary of the submissions from public bodies can be found below:

An Garda Síochána

“The proposal for cashless payment will enhance security for Small Public Service Vehicles (taxis) and it is anticipated that this will result in a reduction of crimes such as robbery, theft and assault on taxi drivers.

The National Disability Authority

“The National Disability Authority (NDA), as the independent statutory body, provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities. We have a role to assist the Minister for Children, Equality, Disability, Integration and Youth in the co-ordination of disability policy. We work through our Centre for Excellence in Universal Design to promote the universal design of the built environment, products, services and information and communication technologies so that they can be easily accessed, understood and used by everyone, including persons with disabilities.

The NDA wishes to make a submission with regards to the proposed maximum fare increase tariff and the cashless payment guidelines due for publication by the National Transport Authority (NTA).

The importance of integrated universally designed public transport services that include the built environment and information and communication technologies is underpinned by Article 9 of the UN Convention on the Rights of Persons with Disabilities. Ireland ratified the UN Convention in 2018. Article 9 states that in order for persons with disabilities to live independently and fully participate in all aspects of life, they need to have access not only to accessible transportation but also to the wider infrastructure, the built environment, information and communication processes and technologies and to other public facilities and services.

Section 6.3 of the National Planning Framework for Project Ireland 2040 also identifies universally designed transport services, in addition to housing, education, and health services, as key areas that need to be developed to facilitate the development and progression of diverse and inclusive communities.

The importance of transport in the lives of persons with disabilities and the necessity for transport services that are accessible to everyone is also highlighted in The Comprehensive Employment Strategy 2015 – 2024; National Disability Inclusion Strategy 2017 – 2021.

Requirements for payment and self service terminals

No information is provided about the specifications of the payment terminals to be used in taxis, but the NDA advises the following points. It should be noted that terminals which are touch screen only are not accessible for some people with disabilities and older people and may lead to them being unable to confirm the fare to be paid at the terminal or to expedite payment in the absence of any kind of tactile interface. The NDA would like to stress that the NTA should make use of payment terminals which have been designed with accessibility in mind. Some examples of the features which should be incorporated into payment terminals in order to ensure their use by the widest range of people possible include, but are not limited to:

- ☐ The provision of a tactile overlay to aid people with disabilities to locate and interact with the keyboard*
- ☐ The provision of appropriate fonts and/or typography to ensure that the information can be clearly read*
- ☐ The provision of auditory (voice and/or non-speech audio), as well as haptic feedback to aid in use of the device.*

Further technical accessibility requirements can be found in the EN 301549 harmonised standard.

The NDA advises extensive consultation with disabled persons organisations (DPOs) and persons with disabilities on the accessibility of payment terminals. Further, the NDA recommends that use of accessible payment terminals should be mandatory in all cases.

The NDA also wishes to emphasise that drivers must still have the facilities to accept cash payments. It is not detailed in the document whether drivers will still be required to take cash payments as well as to accept cashless payment, but this will be vital so as not to disadvantage people with disabilities, older people or others who may be unable to use a payment terminal. Many older people rely on cash as their default way of paying and some do not have bank accounts or bank cards and some people with disabilities may prefer this method over using an unfamiliar method of payment.

The NDA advises that the NTA will need to take account of the European Accessibility Directive (EU) 2019/882, on the Accessibility Requirements for Products and Services (European Accessibility Act). Member states are obliged to transpose the European Accessibility Act (EAA) into national legislation by 28th June 2022 with implementation commencing from June 2025. Accessibility requirements are

binding on public administration organisations and the private sector, that is, anyone who produces or provides products or services falling within the scope of the EAA. From 28 June 2025 the legislation will apply to a wide range of products and services, including Payment terminals and certain self-service terminals such as ATMs. It is important that the proposed Guidelines for the Acceptance of Cashless Payments in Taxis and corresponding requirements are aligned with the requirements set out by the EAA to ensure the greatest possible accessibility and to avoid the need for retrofitting in future.

Further to this, the NDA would like to remind the NTA that Section 27 of the Disability Act, 2005 requires the head of a public body to ensure that services provided and goods supplied to the public body are accessible to people with disabilities, unless that would not be practicable, would be too expensive, or would cause an unreasonable delay. As such the Code of Practice on Accessible Public Services and Information provided by Public Bodies highlights that procurers in public bodies should highlight accessibility "as a criterion to be considered throughout the entire tendering process (from drawing up and running tender competitions through tender evaluation and placing the contract to final debriefing)".

It is also worth noting that the EAA contains a legal obligation for procurement of accessible ICTs including payment and self-service terminals as well as websites and mobile applications. The Public Procurement Directives were updated in 2014 to require public services to procure ICT products under the specifications outlined in EN 301 549. The new Directives contain a significantly stronger focus on the use of public procurement to achieve social gains. Accessibility is arguably one of the strongest social considerations within the text of the new Directives, however the NDA wishes to emphasise that accessibility features in ICT benefit everyone, not just persons with disabilities. Therefore, public procurers may justify inclusion of accessibility requirements on the grounds that it improves the quality of the product or service overall.

It must be noted that Article 42 on Technical Specifications under the updated Public Procurement Directives significantly strengthens the obligations of public bodies except in 'duly justified cases' to take into account accessibility criteria for persons with disabilities or design for all users. This is perhaps the most significant development in the updated directives as it requires all public bodies to include accessibility as a mandatory requirement in the public procurement of all goods and services for use by people, be they members of the public or employees of the government.

Additionally, under the Web Accessibility Directive, the procurement and development of public websites and mobile apps must comply with relevant clauses of EN 301 549 v3.2.1 (which is equivalent to WCAG 21. AA).

To assist the NTA in meeting these requirements the NDA recommends communication and consultation with persons with disabilities and older people to determine their needs with regards to any changes to booking and payment infrastructure. This will ensure that payment infrastructure takes a universal design approach, which will mean a payment structure and mechanism that is easy to access, easy to understand and easy to use for everyone, including persons with disabilities and older people.

Conclusion

Transport plays a crucial role in empowering people with disabilities to participate in everyday life and the activities of their communities. Approximately one in ten people with disabilities said that inadequate/inaccessible transport systems prevented them from participating in social events.⁸ About one in six people with a disability are not in work who would be interested in a job, cite transport or parking as an issue for them. Those with sight, mobility or intellectual disabilities are most likely to cite transport as an issue for employment.

In this context therefore, the NDA advises that the NTA should adopt and implement a Universal Design approach when engaging with the public on taxi fare changes and cashless payment services. The NDA advises that the NTA must also be aware of requirements with regards to the procurement and provision of services.

The NDA is happy to meet with the NTA to discuss this submission. The NDA is looking forward to continuing to work with the NTA to develop and implement integrated universally designed transport services.

5.1.2 Submissions from Other Groups

A summary of the submissions from other groups can be found below:

Bolt

2.2 Cashless Payment Facility Regulation

Whilst Bolt is not a driver representative organisation, it has considerable experience in the use of cashless payments and has shared this experience below;

Bolt services in Ireland and across much of Europe are based on cashless payments. This has been no obstacle to customer take up and has been welcomed by many. The increased use of cashless payments options enhances safety for drivers as less cash is carried, ensures that drivers are paid for the journeys they undertake and enables efficient and automated receipting. Additionally, it avoids the need for customers to carry cash, change up currency and be concerned about tracking expenses if in Ireland on business.

Bolt welcomes the move to introduce mandatory acceptance of cashless payments.

5. CASHLESS PAYMENT FACILITY REGULATION

As explained in section 2.2 Bolt welcomes the NTA's proposals to require the provision of cashless payment facilities in Ireland's taxis. Bolt believes that this will enhance safety and convenience for drivers and passengers.

Since October 2016 when acceptance of credit and debit cards in taxis became a mandatory requirement in London by Transport for London⁸ London taxi drivers have reported a significant shift by customers from traditional cash payments to the use of payment cards in taxis. Providing evidence that customers find this facility useful.



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National Transport Authority
Dún Scéine,
Harcourt Lane,
Dublin 2,
D02 WT20

27 May 2022

RE: National Maximum Taxi Fares Review and Cashless Payment Facility Regulation

To whom it may concern,

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development (SDG) goals and stronger integration with our local community and the principles of sustainability, resilience, inclusion, equality and diversity. Specifically, Goal 8 Decent Work and Economic Growth is most relevant to this public consultation.

Cork Chamber is cognisant of the many challenges and pressures the taxi sector has faced over the past two years in the wake of the COVID-19 pandemic and continues to face as the War in Ukraine impacts our supply-chains resulting in inflation and fuel price surges.

Considering the current economic environment and the review the NTA undertook, we are supportive of the 12% increase in the National Maximum Taxi Fare. It is essential that taxi drivers receive a fair and decent wage as service providers and valuable community members. We advise that perceptions and reactions of taxi users to these price increases are managed effectively, through the supply of information in relation to the rising costs and pressures the sector is facing.

We are further fully supportive of the introduction of mandatory acceptance of cashless payments. The country's payment landscape has become increasingly digital over the years, with the COVID-19 pandemic pushing consumers further away from cash. While cash payments will no doubt remain a part of our economy, it is essential that card and virtual wallet payments are properly facilitated.

The COVID-19 pandemic brought many challenges to our economy and society. It is no surprise that demand for taxi services decreased as society locked down and many cocooned and re-imagined their mobility modes due to public health and safety concerns. However, with the pandemic behind us, society is returning to normal life.

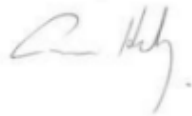
Further, Cork is on the path to population growth. In the Southern Region, the National Planning Framework (NPF) plans for up to 380,000 additional people and Cork will be home for 60% of these people. Cork will also host up to 135,000 new jobs. With additional plans, outlined in the Cork City Development Plan 2022-2028 and CMATS, to reduce private car dependency and enable a multi-modal transport system, it is imperative that a diverse and sufficient supply of transport options are made available to facilitate this.

Cork Chamber advises that the supply of active taxis in the fleet increases in accordance with the increased demand being recognised across the Cork region. Whether people are commuting into work or using taxi services for leisure and tourism purposes, it is essential that taxis be available for hire especially at peak times.

Finally, the emergence and increase in supply of electric cars in the fleet is most welcome. With Cork's selection to be a carbon neutral city by 2030, every element and player within our economy must consider how this ambition is being driven forward. The continued decarbonisation of the taxi fleet and contribution towards this goal is encouraged at every front.

Cork Chamber looks forward to working with the NTA to deliver a sustainable and accessible transport system for Cork, and are available at all times for consultation, discussion and support.

Sincerely,



Conor Healy
CEO

Dublin Town

“Thank you for forwarding the opportunity to respond to the consultation to us. In relation to the issues raised Dublin Town would make the following observations:

- 1. Dublin Town supports the introduction of mandatory card acceptance. The increased preference of the public to use card payments has been noted by many city businesses since the pandemic. The acceptance of cards is now something increasingly expected by customers. We would consider this to be of increased importance within industries with increased tourist engagement.*
- 2. Dublin Town supports a premium rate for drivers who provide a service at less sociable hours, at night and bank holidays. The availability of taxis at night, is an increasingly significant issue for the city’s Evening & Night Time Economy trades. Customers are complaining of the unavailability of taxis late at night and impact that this has on their ability get home safely following a night out. Workers in the evening & night time economy have also raised issues of taxi availability at night.*
- 3. Dublin Town supports taxi drivers receiving an appropriate income that reflects the increased cost base which they are experiencing. We believe that the proposals set out by the NTA in this regard appear fair and reasonable.*
- 4. Dublin Town would see the above in the context of raising standards and the enhancement of the customer experience. We would envisage the renewal of the programme to provide more comprehensive night time public transport which had begun before the pandemic struck.*

Yours sincerely,

*Richard Guiney.
CEO
Dublin Town.*

Free Now

“FREE NOW strongly supports the proposed Cashless Payment Facility Regulations. There is significant consumer demand, and an expectation, for this facility. It is important that taxi regulation in Ireland is in line with international best practice and offers consumers convenience and security.”

Irish Hotels Federation

“IHF members are strongly in favour of this proposal. With the high cost of taxis, it should be expected that this service is available to all customers. Overseas visitors often do not carry sufficient cash for a taxi journey & many business people need to pay by card for expenses purposes.”

Irish Wheelchair Association

"I am unsure, as I assume there are still many people possibly older people who do not use bank cards to pay for everything"

Uber

"Uber agrees with the draft Cashless Payment Facility Regulations as outlined by the NTA. Uber's app securely registers cards which are then automatically charged, and even allows for other secure payment options."



Maximum Fares and Cashless Payments Review
National Transport Authority,
PO Box 436,
City North Business Park,
Tuam Road,
Galway

**RE: Proposed National Maximum Taxi Fares and Proposed Small Public Service Vehicle
(Cashless Payment Facility) Regulations**

27 May 2022

Dear Sir/Madam,

Uber welcomes the opportunity to respond to the National Transport Authority (NTA) consultations on both the National Maximum Taxi Fare Review and the proposed SPSV (Cashless Payment Facility) Regulations.

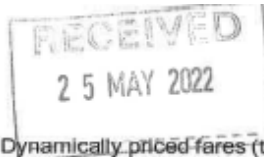
Uber notes that the NTA has provided an online portal for responses to the consultations, which we have responded to separately. We believe the Fare Review also provides an opportunity to look again at how the Irish taxi market is priced, taking account of new technologies that will enable drivers to earn more and offer a safer, more reliable service to customers. The comments below provide additional detail on the potential benefits of greater pricing flexibility for Ireland, as well as examples of other markets where this is already working well.

National Maximum Taxi Fare Review

In the context of the National Maximum Taxi Fare Review, Uber encourages the NTA to consider introducing greater pricing flexibility to Ireland's taxi market by: 1) allowing fares for pre-booked (e.g. through an app) trips to be calculated dynamically with an app, versus statically with a meter, and 2) replacing the flat €2 booking fee with a transparent, dynamic fee, based for example on how far a vehicle would have to travel to a pickup point.

We believe that such a move would deliver a range of benefits for passengers and drivers in Ireland's taxi market including:

1. **A more efficient taxi market** - Platforms like Uber use technology that calculates fares based on trip time and distance, combined with real-time rider demand and driver availability. This ensures that prices reflect local demand and supply at any particular moment. Compared to traditional taximeters, Uber's pricing model creates a more efficient market in real time by actively managing demand and incentivising supply. In other words, it encourages more drivers to drive to busy areas at busy times. It incentivises riders who are not in a hurry to wait until fares fall or seek alternatives. This improves reliability for riders and earning opportunities for drivers.
2. **Improved service quality and safety** - Pricing that is able to rise and fall with demand would incentivise more drivers to look for app-based work during peak times. That means better ETAs and reliability for passengers throughout the day. This is not just important for service quality, but can have safety implications, especially for people ordering a taxi at night.



Uber

3. **Improved driver earnings** - Dynamically priced fares (that rise and fall with demand) can also enable drivers to earn more, incentivising them to actively seek out trips at times and in areas of high demand.
4. **Serving Ireland's hard-to-reach areas** - When taxi drivers can accept trips pre-booked via an app, it becomes easier for riders outside of busy, central "hail zones" to access taxis, as metered taxis are more likely to primarily service higher-density areas. The result is better transportation access for riders and more earnings opportunities for drivers, particularly when making drop-offs outside of central business districts.

Uber operates in taxi markets across the globe and has already seen the benefits of moving to a more dynamic pricing structure. Below are some examples of where this has been considered. We would of course be happy to share more information if this is of interest.

- **Japan** - Uber undertook a two-month trial in Tokyo, implementing dynamic pricing for ~13k taxi drivers. Not only did we see a positive rider experience with >85% of riders satisfied with dynamic pricing due to competitive taxi fares at non-peak hours, we also saw an uplift in driver earnings of +37% trips per hour and +16% gross earnings. (Note that seasonal demand changes and other factors may also influence driver earnings.)
- **Austria** - In March 2021, Austria introduced a taximeter exemption for pre-booked trips in order to enable more dynamic pricing. This has led to an increase in overall demand for taxis but also seen supply shift to peak hours. It has also led to greater efficiency in the market. While per-trip earnings may be lower (driven by off-peak hours), our estimates suggest earnings per hour have improved, as drivers are able to complete more trips, are incentivised to go to busy areas, and can opt for higher-priced trips during surge periods.
- **India** - An Uber [study](#) from Mumbai in 2017 showed that drivers who were able to undertake app-based, dynamically priced trips in addition to their normal metered street-hail trips, saw a 30% uplift in their total revenue KMs/Hour (the number of kms driven per hour while actively generating revenue) and a 44% increase in revenue per hour as a result of less time spent idling.

Cashless Payment Facility Regulations

Uber agrees with the draft Cashless Payment Facility Regulations as outlined by the NTA. Uber's app securely registers cards which are then automatically charged, and even allows for other secure payment options.

We welcome the opportunity to share our views on the current consultations and look forward to working with you to deliver for passengers and drivers alike.

Yours sincerely,

Laurent Slits
Head of Rides, Uber Ireland

5.1.3 Submissions from Industry Representatives

National Private Hire and Taxi Association (NPHTA)

Submission RE: cashless payment Facility Reg

The proposed statutory instrument places a very onerous obligation on the taxi driver and contains no contingency clauses or qualification of the requirement in the event of the following common scenarios in this jurisdiction:

- Failure of payment system on a local or wider scale
- Cyberattack
- Areas with no or poor phone signal coverage
- Areas with no or poor wifi coverage.



The matter needs to be reviewed by the authorities in greater detail. While it is accepted the introduction of electronic payment systems in all taxis is a reality for the industry there must be contingency contained within the SI for situations beyond driver's control where the electronic payment system will not work or more likely where a passenger's card may not work, for whatever reason. As the SI is currently drafted the onus of payment for the service by the customer appears to be completely eroded and the SI must reflect the overriding obligation on a customer to pay the fare for the service provided. As currently drafted it may be argued the service provider has no recourse in the event the electronic payment does not work.

We believe protections need to be incorporated into the SI in this jurisdiction as the current draft is too onerous and takes no account of the multiple possible situations where electronic payment cannot be processed.

Also should the cashless payment system become faulty as commonly happens. It takes up to 10 days to have it repaired or replaced. Under the proposal drivers will not be able to work for that period of time.

The costs of providing cashless payments vary but 1% incorporated in the new fare proposal will not cover same. According to NTA survey over 90% of drivers are already providing this service and since inception increasing use of cashless payments sees increased costs up to 4.8%.

It is our opinion should the si be passed as stands It will change the fundamentals of taxi drivers work place (customers obligation to pay) and creates a grey area for customers to start confrontation. It should be considered taxi drivers encounter customers who have consumed drugs and or large amounts of alcohol. These encounters happen in places and situations were no assistance from An Garda is possible.

It is for the above reasons we believe not only is this proposal unfair we believe it dangerous to the safety of taxi drivers throughout Ireland.

We object to its introduction in the present format. We would like to contribute to an alternative proposal.

Jim Waldron On Behalf of the National Private Hire and Taxi Association.

Jim Waldron N.P.H.T.A.

17-5-22

Submission to the taxi regulator for public consultation 2022

Irish Taxi Driver's Federation

Submission

To the taxi Regulator

The members and committees of the Irish taxi driver's federation (I.T.D.F) are very concern with the taxi regulator putting out for public consultation to make it mandatory for taxis to have card reading devoices in their taxis. We strongly recommend the regulator dose not pursue this avenue to make it monetary and leave it to the discretion of the taxi drives. As many taxi drivers do have card reader thay also have the discretion.

The taxi regulation says the passenger must have the ability to pay the taxi fare that relegation will be certainly weakened or perhaps no longer apply if it becomes mandatory and it will be open season on taxi drivers to be scammed by customers knowingly hiring a taxi and their card will decline. We have anecdotal evidence that drivers with the card reading devices have experiences some problems with people's cards declining and giving drivers many excuses. Thay give the driver false contact details name mobile numbers and so on even if the driver is lucky enough to get the correct mobile number when the driver call the next day looking for the fare thay will tell the driver they will call them back and then block the number it's all at a lost to the driver. Nobody in any business should have to put up with that behaviour. The Gardaí will be inundated with these type of calls from drivers on a daily basis that will end up with a great loss of time to the driver which will not be worth the fare.

This would be exposing drivers to scammers and con artist it would leave the drivers personal safety in jeopardy most disputes in taxis with customer's gets heated and can sometimes lead to a hostile situation and even assault's on drivers and also causes mental stress to the driver afterwards The health & safety also the duty of care to taxi drivers is paramount to our organisation

Submission to the taxi regulator for public consultation 2022

A taxi is a mobile business drivers can only charge at the end of a journey. For example a shop will not give you goods if your card declines in the taxi drivers case they risk not getting paid at the end of the journey using card payments.

It is rumoured the regulator also wants to issue fines to drivers of €200 or more if the driver does not have a card reader device in the taxi can this be clarified.

1 Irish legal currency is euro's any other type of payments is a promise to pay

2 We don't know of any law for private business to have card rendering devices to run their business

3 There is no law for anyone to have a bank account some taxi drivers don't have a bank account

4 your proposal would certainly force drivers out of the taxi business.

We also bring to your attention a couple of facts with card readers when a taxi derives a passenger across the east link and through the port tunnel the driver pays tolls of €4.90 off peak times and €11.90 at peak times most drivers pay cash at the toll kiosk then the driver gets the toll's paid back by card payment the driver's cash comes back in an electronic payment. The card company's/bank's takes their commission out of the toll's when that payment arrives into the driver's bank account it can't be distinguished the next year when filing their income taxes which transactions has toll's paid . To our research there is no card company or bank that has a card reading device to allow for tolls or gratuity so card companies /banks get to charge on the whole transactions.

The regulator says a taxi drivers cannot charge on personal cards i.e. A.I.B / bank of Ireland and others so the driver takes the loss. The Banks charges is in and around 2% on personal cards for example on a €20.00 fare the driver loses 40 cent and so on this is on top of losing their gratuity using card readers.

Drivers are reporting up to 95% of their gratuity being lost when being paid by card. We are part of the service industry gratuity is paid to the taxi drivers for delivering a good and professional services to the customer

Submission to the taxi regulator for public consultation 2022

Just to bring you up to date the mandatory implementation of card readers at Dublin airport some drivers have stopped working the airport and did not renew their permit due to the enforcement of card readers the D.A.A did not make any allowances for any driver who has not caught up with modern technology or for the natural phase out of the older taxi generation. In any job or business there would be allowances and exceptions made for these people.

The email we received from your office states the cost of running a taxi since 2017 has risen between 10.7% and 11.5 % and says a 12% increase on the taxi meter which also incorporated card reading devices. Credit cards like Amex / American express and Diner along with some outside EU/UK cards carry a 5% and more commission so that mean that realistically you are proposing a 7% increase to the taxi industry. We propose a 12% increase excluding any card charges due to the higher cost of purchase and running a taxi. The C.S.O. figures for inflation up the end of March was 6.7% and the consumer price index was 8.5% to the end of March. Up to the end of March this year fuel prices has gone up by 33%.

The I.T.D.F propose to allow an emergency charge for example €1 to be added on to a €10 fare and €2 to a €20 fare this is a 10% emergence fuel charge. You made emergence changes to composite for a public holiday on the 18 of March this year and also with the card reading devices to cover the card percentage. A precedent has being set already. We also propose that when taxi meters have to be reprogram that you put in a 3% annual increase that can be pre-programed on the meter to automatically come into effect on an annual bases rather than every 2 years.

Kind Regards

Des Dempsey

Assistant secretary

I.T.D.F



24/05/2022

T.T.n.H. FARE REVIEW SUBMISSION DOCUMENT 2022

Dear Sir/Madam,

I wish to advise on surveying our Members with regard to the impending fare review 2022 and the issue of cashless payments a number of concerns have been raised.

Currently non-payment of cash fares in many cases results in a visit to a local Garda Station and in most of the cases time lost and indeed payment are never recovered. This is causing difficulties for drivers whereby in the case of cashless payments a declined card will mean funds are unavailable. Many systems Hotels, Fuel Stations and other providers offer a pre-payment system with the card being authorised initially. It is vitally important that operators be paid for their services with payment guaranteed and the NTA who is introducing this mandatory payment ensure operators are fully protected.

Another concern raised centres around technology. Operators currently providing cashless payments have had issues with mobile phone networks and signalling resulting in a payment by cash where available with time lost due to a trip to the nearest available A.T.M. Another difficulty raised by members is with payment by multiple passengers in vehicle wishing to pay separately by card with the driver paying multiple merchant costs and fees for the one trip. Considering the current age profile of the industry many operators are simply not tech savvy and will need upskilling prior to the introduction of cashless payments to best offer their services

Alan Brennan
Secretary

T.T.n.H - Tiomanai Tacsai na hEireann
Unit 9 Bellevue Industrial Estate
Finglas d.11.
Telephone: 085 2157999 ttnh2012@gmail.com

5.1.4 Statutory Consultation - Advisory Council on Small Public Service Vehicles

*Advisory Committee on Small
Public Service Vehicles
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2
D02 WT20*

Ms. Wendy Thompson
Director of Public Transport Regulation
National Transport Authority
Dún Scéine
Harcourt Lane
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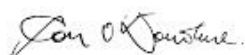
27 May 2022

Re: Draft Small Public Service Vehicle (Cashless Payment Facility) Regulations 2022.

Dear Wendy,

I refer to the above and advise you that the Advisory Committee on Small Public Service Vehicles has considered the draft Regulations and is in favour of the proposal to require drivers of taxis to carry a functioning cashless payment facility whilst operating and to accept cashless payments for any journey.

Yours sincerely,



Con O'Donohue
Chairperson
Advisory Committee on Small Public Service Vehicles

6 Appendix A – Individual Submissions

Submissions with Additional Commentary	
Opinion	Additional Commentary
Agree	There must be an easy way for passengers to report drivers unwilling/unable to accept cashless payments. There should be consistent and high enforcement of the proposed penalties. Should there also be a 3 strike rule eg 3 fines in a rolling 6 month period results in withdrawal of license?
Agree	64% of all payments made in ireland in 2019 were card. This surely has only increased since the pandemic & the focus on cashless payments. Less & less people carry cash & it is creating dangerous situations where people are being left stranded as taxis will not take the most popular form of payment
Agree	When it's a taxi drivers job and duty to take the consumer from point A to point B in as safe a manner as possible, There is zero reason in 2022 for such means of transport to limit the payment methods offered in an age where the majority of consumers own a card/smartphone
Agree	Enforcement will be key. I think a €200 penalty may be a bit light.
Agree	Many times I've only had a certain amount of cash on me and ask the driver to pull over when the fare reaches X amount. Despite having enough in the bank account. Resulting in either a very sound driver bringing me to my door for free, or me having to walk home alone and feeling unsafe in the dark
Agree	Accepting cards should be the law. It's been said to me many times it 'costs' the driver to accept card, I believe this is as low as 2% which implies to me it's a tax dodge issue. Apart from Covid etc, it's 2022 card payments should be the complete norm for a service such as this
Agree	Mandatory cashless payment availability is long overdue. This should be standardised to accept debit, credit, and contactless. This alone helps justify the increased fare proposal.
Agree	As a taxi driver I already take cards, its the future, we have as an industry to move along with the changing times and needs of out customers
Agree	I support proposed changes to Cashless payment for Taxis. Current scenarios allows taxi drivers to pick and choose fares, with preference for cash payment, and has left myself, and peers stuck accessing taxis in the evening.
Agree	About time.
Agree	It would be great to see more options for payment machines. I use sum up and can sometimes cause delays restarting the Bluetooth with connectivity issues.
Agree	Cashless facilities are a must in this day and age. The technology has been available for years to taxi drivers and there is no excuse for this still being optional.
Agree	Every taxi should have one
Agree	Cost of running card machines should be passed on to consumers
Agree	About time. I've accepted card payments for the last 4 years. Why not add Revolut or similar while we're at it.
Agree	In the interest of public safety taxis should be required to accept cashless payments.
Agree	NTA are way behind on this. Cashless facilities should have been mandatory from years ago. I, personally, have had a "chip n pin" option since 2006!!!
Agree	It makes my job easier.
Agree	Walking home alone as a woman is dangerous. Taxi drivers regularly deny a fare because they won't accept card payment. This would make getting. Taxi fairer for all across the board.

Agree	Taxis picking and choosing if they wanna take you with card is ridiculous
Agree	It's the 21st century long overdue really
Agree	While I also agree with the cashless payments, what happens in the event of no Internet coverage, insufficient funds and other unforeseen issues. There has to be legislation to ensure payments in these circumstances as a fall back for Drivers.
Agree	I have had a card payment facility in my taxi for the last few years and it is easy to use and takes a couple of minutes to set up and use
Agree	Too many taxis refusing to take passengers unless they are paying with cash at heuston station, disgraceful behaviour....
Agree	Entirely appropriate that cashless payment be facilitated for all fares. Notwithstanding the pandemic, there is little in technological or other rationale to prevent this being in place.
Agree	Yes all taxis must have chip and pin machines which can also issue receipts and not just an app payment system which should close any unforeseen loophole, but there must be only a minimum merchant fee
Agree	If someone wants to pay by bank card. There should be an extra €0.50 charge for service charges. As all service providers takes commission.
Agree	Hi, I've been using card payment for 4 years now it should have been mandatory long time ago.
Agree	A fine for non compliance should be imposed on drivers who won't accept card
Agree	I have it from first day since I started as a taxi driver
Agree	Most drivers already have this facility. What % of drivers don't?
Agree	It's a no brainer. Makes sense for tourists and those who reside here. People are carrying less and less cash. Going to an ATM late at night to withdraw cash just to get a taxi is unsafe and unnecessary. The treatment of people by some drivers not accepting card in recent times is scandalous.
Agree	The inability to know if a taxi driver will accept card is a large deterrence in hailing a taxi from the street. Recently I was in London, where all Black Cabs come fitted with a card machine - which basically made it much easier to decide on jumping into a taxi, rather than using any app.
Agree	I believe cash payment facilities must be visible inside vehicle as well as compulsory.
Agree	Should be mandatory to have a card reader, but we should still be able to accept cash in case something goes wrong say with the internet connection. Customer should be able to choose what they want.
Agree	A high percentage of customers now want to pay by card
Agree	I term should be in enclosed to monitor that the maintenance and upkeep of devices. This will ensure all taxi are working card machines and where a device is out of service is should be reported
Agree	Ive had card option for years with sum up even before covid all taxis should have the option why wouldn't they
Agree	How is this taking so long??
Agree	It's imperative that we taxi drivers get mandatory card machines , as it will significantly help win back the work from the unscrupulous App companies
Agree	I have always taken credit card payments.. I'm happy for this type of facility to be mandatory but drivers should be able to continue to use whichever company/device they wish to use.. I currently use Sumup
Agree	They dont have the range and there arent enough charging stations, if i dont get extension on my 13 lexus then im afraid i will have no choice but to cease trading. I purpose you leave the drivers with there current vehicle and when they change then they must get a ev vehicle, by then the infrastru

Agree	Without question this is required - cash has little place in modern society and the lack of requirement to accept cards is a safety issue for many, and an embarrassment by international standards.
Agree	Given that, NTA provides a cost free cashless technology to which there will be no commission charge or atleast is levied by the govt if partnered with contactless payment methods such as "sumup".
Agree	Cashless taxi journeys will benefit a lot of passengers
Agree	Absolutely 100% - a large number of taxis are refusing to take card payments despite in most cases having card payment machines(they always seem to be "not working" LOL) - this is obviously to avoid tax. However, main issue is it is a massive inconvenience for customers, no one has cash any more.
Agree	Why do taxis want to deal in cash? It's obviously more dangerous and puts them at higher risk of robbery. Same for the customer. They must want cash in hand jobs and there is no justification for this. They need auditable earnings like the rest of us
Agree	I have female friends who couldn't get a taxi as they didnt have cash on them. They were left feeling unsafe in the city centre. This could lead to a potential decline in the nighttime economy. In 2022 it's ridiculous that a service wouldn't take card.
Agree	In the era of technology we should be allowed to pay everywhere with card and not to worry if we don't have cash on us.
Agree	I see there are two offences: failing to carry a cashless device and failing to accept a cashless payment. I agree with this, as I expect otherwise many drivers will do as they do at the moment and say their device is broken. Failure to accept card should also void the payment for the trip.
Agree	Wholeheartedly agree - all taxis should take card. Given we are now a mostly cashless society and taxis need to move in tandem with this.
Agree	Most taxis are already accepting cashless payments and so proposals will have little effect.
Agree	I completely agree with the proposed cashless payment facility regulations. A taxi should not be on the road without a fully operational cashless payment facility.
Agree	I have a card machine since my first week on taxi business
Agree	All forms of modern payment methods must be accepted without question. The default option should be Credit / debit card, contactless with phone, contactless with card. However an option for cash payments should also be provided.
Agree	Take into consideration that if the driver has a card machine but on a night it those not work. Don't penalise the driver
Agree	Move with the time Machine only
Agree	They shouldn't be allowed to charge any fees to go cashless as they charge when ordering by app 2€ normally
Agree	I believe these are essential and cashless payment should be enforced. I would go further in ensuring that the regulations ensure that there is easy follow up for drivers refusing to take cashless. Operators claiming that their machines are broken or similar should not be allowed operate until fixed
Agree	Insane that it's taken this long to do this- get it done.
Agree	It's absolutely ridiculous that taxis don't take card as standard, it's actually embarrassing when compared with other countries
Agree	The fines are too high at €200. What option has a driver if the card reader stops working and has to be replaced. Has the driver to stop working or risk the possibility of being fined while he is waiting for a replacement card reader

Agree	This should be introduced immediately and combined with strict enforcement. Already, many taxi drivers engage in taxi dodging by claiming their POS don't work or that they don't have one. Without enforcement this move will be pointless.
Agree	These cashless providers charge up to 2% handling fee There is no mention of passing this on to the customer As well as the base controller fees of up to 15% from providers like FREENOW. Or UBER or BOLT This takes up to 17% out of the fare This is another drain on income
Agree	This will be a better customer experience for the public
Agree	This will make the customer experience better a make the taxi industry more professional with payment options
Agree	In this day and age we should not even have this conversation. Having a card machine should be Mandatory and if one can't accept card payment he should let the customer go for free.
Agree	Taxi is public transport and all the taxis should have card machines as buses. Nta should check all the taxis to have this implemented. As a customer I shouldn't be constrained to pay with cash. We need to progress.
Agree	When payment is processed, it should be linked to the license of the taxi to improve transparency amd security for passengers
Agree	Accepting contactless/card payments is something that is around in many other EU countries for a long time. In a post covid era, it can be considered an expected minimum for businesses to accept these payments - taxis should be no different in accepting payments.
Agree	It's long overdue and it's moving with the times
Agree	In this day and age, if a taxi driver was not to provide a card payment system, it would simply be to not report it and avoid paying tax on it. It gives taxi drivers a bad name and should definitely be mandatory.
Agree	Good decision
Agree	If the minimum fare had to be given in full to the driver and booking apps charge a maximum of €1 per journey to customer on booking then the fares don't even have to go up. Drivers are paying hundreds a week in commission 15% to booking apps that costs them €15 a month to run. NTA bring in own app.
Agree	The cost of the credit card facility should be passed on to the customer
Agree	I have traveled extensively throughout the world and Ireland is the only country I've visited that taxis doesn't generally accept card, this is including several countries in the developing world in Africa. It's an embarrassment. Also, Ireland should offer Uber/Lyft, another embarrassment.
Agree	It's unreasonable for operators to refuse a fare if that person cannot pay cash now that all other consumer transactions are cashless and to avoid operators being targeted, attacked, injured or worse, and robbed of cash takings. Or an impression of operators taking cash only to avoid paying tax.
Agree	Absolutely necessary to have a cashless payment option in order to operate a non discriminatory system
Agree	I currently accept cash less payments but would like to highlight problems i have encountered.In ALL AREAS WHERE CASHLESS PAYMENTS TAKE PLACE THE CARD IS VERIFIED OR PAYMENT IS TAKEN BEFORE THE SERVICE IS PROVIDED . IT IS THEREFORE VITAL THAT SOME MEASURE IS PUT IN PLACE TO REPLICATE THIS WITH TAXIS
Agree	There should also be the complete introduction of Uber and Lyft services for fair market competition
Agree	we have to move with the times we live in every other industry has this facility.
Agree	Think there may need to be exceptions to this

Agree	Passengers should be able to use LEAP CARDS in Taxis and Gift Vouchers for taxis should be available to purchase on line....
Agree	Cashless payment no problem with it I have it already but leave the fares alone please
Agree	I fully agree
Agree	It is vital that taxi drivers are required to accept cashless payments to bring them in line with other services.
Agree	If the driver cannot process a cashless transaction after taking the fare the passenger should get the trip free of charge.
Agree	I would suggest that the fines for the non provision of cashless payment facilities should be significantly higher, and any breach of these regulations on more than one occasion should result in the driver being suspended for a period of time, or loss of licence for a third offence.
Agree	Ireland has become a place where contactless payments are more appropriate and common for private transactions. Covid expedited that process. Taxis and hackneys should be part of that development. I would imagine that it is also safer for taxi/hackney drivers not to have cash on their persons.
Agree	If a card machine is not working, after the passenger has indicated they wish to pay by card, the journey should be free - same as with bus journeys when the Leap Card machine isn't working. At the very least, a substantial fine for the driver should be standard.
Agree	It is so handy to have card payment mandatory. Thanks
Agree	A comparison of the cost of offering cashless payments versus cash should be carried out before passing on an additional 1% for the cost of cashless payments to customers when processing of cashless payments is cheaper than processing cash.
Agree	While the proposed change would result in charges for taxi operators, the NTA has taken into account the additional costs of implementation; in order to alleviate this they have taken the impact of costs into consideration when conducting the fare review. It should be noted that taxi drivers are potentially losing out on customers who no longer carry cash. Beyond greater customer access, there are other benefits to taxis. Going cashless should improve drivers' health and safety as they are less likely to be targets for robbery. Less administration will also be required in terms of counting cash and depositing it into bank accounts, with the associated handling costs.
Disagree	Always should be multiple options of payments, but not mandatory with fines!
Disagree	I operate in a largely rural area and mobile internet coverage is non-existent in certain areas. This obviously means that in some circumstances I would be unable to process a cashless transaction.
Disagree	Always should be options of payments but not with penalties on drivers
Disagree	Who will be pay fee for card payment!? That discriminate small business in Ireland. Fee for card payment can't be cover by taxi driver when passenger choose card payment.
Disagree	As Taxi driver I have been accepting card payments for many years and I believe we should all have facilities to do so. However it's very problematic when it's put into regulations to do so . Taking card payments is reliant on mobile wi fi and there is still too many areas with poor wi fi
Disagree	Cashless can be unreliable what happens when you get a customer to their destination and cashless doesn't work
Disagree	It costs money to accept cards that the taxi driver has to pay. The banks are the winners here. It should be left to the discretion of each taxi operator and not insisted upon.

Disagree	In 1 hand you're offering to increase fares but then the credit card companies will take up to 5% fee on transactions.
Disagree	For card payments, Tips are gone and rounding off is gone too, so it has to be more than 1% for card payments, it should be 1 euro atleast for card payment rather than 1%
Disagree	My elderly parents get taxis from time to time and neither of them have cards. Cash is how they pay for things. I think the option shouldn't be one system only as in CCs only. Dont make them mandatory as not everyone uses credit cards. Its the same for shops.They use both
Disagree	Reason: not everywhere has good service of Internet that will be useful for payments and sometimes perssengers account cards declined due to shortage of funds
Disagree	20% of Dublin roads have signal problem/ issues with tall buildings, trees or cul the sac or signal loss areas, windy days, heavy raining days, icy days. Also Drivers need to be protected from stolen card processed from unknown passengers.
Disagree	We have limited space in cars to carry all we are already obliged to carry, we have still got areas of poor Internet connection in rural areas so card machines will not work and is cash not legal tender anymore. I also presume that it will be mandatory for ALL businesses to have card machines.
Disagree	Card machines also take commission
Disagree	Credit card transactions are charged at 1.50% by the provider, so 1 % increase for that is not justified. Please reconsider
Disagree	This option should be optional especially for drivers over 60 years old
Disagree	Whilst there are people who would pay with stolen cards and found cards on the street using to getting home. Also there is a charge for us to pay with cards we should charge the extra costs to passengers because this way we don't get the full amount of the taxi fare. Thank You
Disagree	I dont trust the technology. I'm a luddite regarding all technology and to old to learn. I dont and never want to work for banks. A sticker on window telling customers whether cashless or not is fair to all and sufficient. Let customers choose their taxi as they do when selecting any on rank.
Disagree	I work nights as there is less traffic .Customers/ Students from pubs & nightclubs are my main target customers. Either they don't have enough money in their card or they forgot the card at home Tap function in their phone doesn't work. This happens at least 4-5 times a week.
Disagree	A problem I have with being forced to get a card machine is if the person may or may not have the money to pay for said fare, who is going to pay the bank charges on said machine , it doesn't matter if if its 5 euro a week or more it all adds up at the end of the year
Disagree	My reason of opposition is the card reader machine will charge additional money at the bank, however passenger will not pay this charges incurred by the driver
Disagree	If it starts with taxis what's next. My fear is this idea will spread to buying your weekly shop or a drink in a bar or resturant and who benefits from this only the banks. Every transaction will be recorded. Another erosion of freedom. 1984 may have passed but the same plan is still in operation.
Disagree	It is my understanding that that any transaction other than cash has to be agreed by both parties is the proposed change going to remove my statutory right to agree or disagree to the card payment
Disagree	If the customers are paying by cards, there'll be less tips (most no tips)from the customers which would subsequently reduce our motivation to provide decent services to the customers

Disagree	Additional cost on drivers due to commission charge. Gross inconvenience while accepting payments on busy city streets due to time taken (delay) in online transaction
Disagree	Acute shortage of taxis in Dublin, many more will quit. Immediate cash is often needed in poor households to meet immediate needs. Proposal assumes always-on internet access which is not available, not even in Dublin. Is it even legal to insist that one specific trade pays fees to banks?
Disagree	it involves extra financial burden to a driver i.e. > A good smart phone. >Internet >Credit Card Machine. Percentage of each transaction to card company. if making mandatory then should be allowed to charge extra on card payment. if anything out of order can be a big dispute with a customer.
Disagree	Mandate is unnecessary I love freedom and mandates take away our freedom.
Disagree	It is an unfair expense on the individual Taxi driver, if people want to pay by card there are other ways like paying through Free now or bolt, which is convenient for everyone
Disagree	Cards has alot of issues specially me being a night driver people ask me if I take card I say yes and then i could be driving all the way to bray and at the end of journey their card wouldn't work and then tell you come tomorrow ill pay you or they fo a runner shouldnt be mandatory only optional
Disagree	The reason I disagree about cashless payment because many time we get trouble we customers they don't have money In the card they show you tap payment after they tap no credit in the card that my appointment and I would prefer cash less payment has to fine a solution for it : thank
Disagree	Extra expenses paying providers and fee transactions should b left to the individual drivers because as u know fraud will become apart of it with cloning of cards etc
Disagree	Card reader company up their price too and taxi apps up their percentage too without regulation.
Disagree	I agreed with the fare increased. Cashless payment must not be mandatory due to Internet Availability in some part of the country. Internet connection is very poor in some areas especially in the mountains or hill area. Strictly, there should not be €200 Penalty for not accepting card Payment.
Disagree	I don't want to link my bank details for this service
Disagree	My comment is to do with cashless payments. Are the NTA going to supply all drivers with credit card machines? Why should the drivers have to buy their own? Also going cashless means the drivers will have to pay a % of their fares to credit card companies, very very unfair pushing this on them
Disagree	There are chances that cards could get declined or in area without Internet. There are lots of cost involved by banks and financial institutions though I support taxi app payments.
Disagree	As this another taxi regulators enforcing measure as if there are not enough already it should be let up to each individual driver if they want to accept card payments or not as a lot of other business and trade people are not forced to accept card payment why should be taxis be any different .
Disagree	As a taxi driver i find i recieve more tips when dealing with cash and i find people would use card much more if they thought they always can.

Disagree	I disagree cause lot of cuatomers who wants to pay with card in night time and when u reach at destination and paying with card then there is no money in the card and there is no Atm around that aread and then u loose the fare and lot of them run away then and driver left with unpaid fare in night
Disagree	Cash mechine wont work some places,people drunk too much they do not know their pin number for card processing, some people they do not have money in the card and finally taxi driver loose the fare, use fraud apps for card payment, later on declined,i filed similar case at greystones garda station.
Disagree	This regulation puts the taxi operators at a huge disadvantage. It obliges the taxi owners/drivers to have a card machine but it does not restrict the amount that a card reader provider can charge. Cost to have a card machine can be as high as 5.6%, we will be worse off than in 2017. $11\% + 5\% = -6\%$
Disagree	There are possibilities of card being declined and at many areas' mobile network is not as good as Dublin city. Most of use bank card reader connected to our mobile network so if the network is poor then the card reader will not work.
Disagree	Cash is legal tender and therefore both the taxi driver and the customer should have the choice (and the right) to cash/cashless payments on ALL public transport vehicles.
Disagree	Already have a card reader and will always offer this facility. Disagree with making it compulsory.
Disagree	There are blockspots where card machine will have no signal Passenger then will say here is my card it's your problem not mine
Disagree	A lot of people prefer to pay cash, every day I have that customers! I think they should have a choice how to pay!!!
Disagree	So what you are saying is if my card machine is not working i can't work until I get a new machine which can take up to a week to get (will this new rule apply to rickshaw) I all ready have a card machine
Disagree	Other businesses that don't accept card payments are not fined. Why should a taxi driver be fined? Surely it is up to the individual in a democratic society if they prefer cash to card. I strongly object to having this decision made for me by some one else.
Disagree	What if card payment failed end of the trip or even before journey card payment worked and after customer doesn't want to go where he want to go how we can process the refund ?
Disagree	loads of reasons to oppose this. 1) my personal experience, There are loads of mobile network black spots which make the card payment declined. 2) in a busy street, wouldn't get enough time to make it and will make traffic block 3) can't ask payment in advance to avoid runners 4) card fee?
Disagree	I am taking with my own experience,many people take advantage of the system while they know they do not have enough fund or some time out of coverage? So please take a alternative before to make it as rules.
Disagree	1.) It is discriminatory against Taxi Drivers. 2.) It also adds to an already high costs for Taxi Drivers, at a time with Fuel Costs going through the roof. 3.) More Taxi Drivers will leave the Industries, at a time when people can't get Taxis. 4.) Unless the NTA STARTS Listening to Drivers
Disagree	This will only cause an extra cost for Taxi Drivers especially at a time when we need More Co- Operation from Taxi Drivers. Perhaps in a few years we could revisited this option
Disagree	As there are thousands of business in Ireland who are taking cash and having no this type of device facility where they may have cards payment, in the same way, Taxi should also be

	allowed to have cash, as in the night time and specially around in country side of Ireland, people haven't cards.
Disagree	It should be stays the way it is And it should be on driver choice.
Disagree	No thanks to cashless regulation
Disagree	Its useless
Disagree	I am using a credit card reader the last 6 months, it takes 3 to 4 attempts to get it to work. People who have consumed large amounts of alcohol are a nightmare trying to operate cashless payments. Another problem is, in Dublin dropping off in the city blocking streets processing card payments.
Disagree	I have cashless payment in my taxi. I still feel it shouldn't be forced on older drivers. Some shops have a minimum payment of €10 for card payment would we be allowed do the same
Disagree	I disagree because in my experience if the driver or customer has no network coverage at the end of the journey payment can not be made and the driver will loose out . I have cashless payment and this has happened plenty of times.
Disagree	Sir I have three examples as to why cashless payments should not be made compulsory. 1. A passenger arrives at Dublin Airport after a holiday and gets a taxi home. The Laser card/credit card are maxed out and no money to pay the driver... Whats the point of consultation if I cant comment.
Disagree	Mobile data is week in many areas and won't work .
Disagree	How can you expect one sector to be forced to accept cashless payment while no other business is, Dublin bus does not take card payments! Next we will be told we can only take payment in rubles
Disagree	Mandatory card machine in the car will add extra trouble for Taxi Drivers. No internet connections or card declined. New that from my own experience with customers. Driving around looking for signal in the card machine or phone. People don't Tip if pay by card. Big No for Card machine in the taxi!!
Disagree	I feel that no soul trader should be made accept cashless payments for any service they provide or goods they may be selling cash is still legal tender and there for the trader should have a choice of payment card or cash
Disagree	It should be a choice. Not mandatory.
Disagree	All the taxi driver have card machine But some time drunk people have money in the card, so taxi driver want to see the money on front, in that case cash less options not working 100% in the taxi business,
Disagree	Extra fee should be added to pay for bank % and cost of device, and wait time
Disagree	My town get new work but many place out town no network always problem no signal
Disagree	Outside town many place don't get network so very difficult and problems. My taxi roof sign no xxxxx.
Disagree	Outside network failure and problems
Disagree	Outside town many place no network
Disagree	I don't think it should be compulsory. A lot of older drivers are leaving because of new technology but we should be doing our best to hold on to these drivers.also collecting credit card payments can be problematic in country areas when people are intoxicated. Should be a choice like any business

Disagree	Not everywhere is connect to WiFi or can get a reception has happen me just recently
Disagree	As cash is legal tender and not everybody has a card , sometimes card don't work and some passengers prefer cash , if I'm asked to take payment by card I'll always do
Disagree	Let people operate the way they want.
Disagree	I will stop driving a taxi if this goes ahead!
Disagree	There is room for both.
Disagree	Because i don't trust banks and i don't want my money blocked in case of a recetion (the way things are looking now, we are moving towards it). Banks will be the first to limit their acces and i do not want to deal with that. I have children to raise, i can't wait for a week/month to get money out.
Disagree	I think cashless payment should be an option not a mandatory thing. Some taxi drivers are old and don't know how to use certain gadgets, why make their life harder? And if there is no internet conection in some areas, how will they get their payment? Tataly disagree with cashless.
Disagree	As a taxi driver, I don't think it should be mandatory to accept cashless payments. On completing a journey recently the passenger's credit card was declined on two attempts, they had no cash. The only option was to bring passenger to the local Garda Station. I was wasting time and money.
Disagree	As a taxi driver, I disagree with cashless payments as a live internet connection is always required to receive payment, the internet connection was interrupted several times this year.
Disagree	Free market is what made this country what it is.
Disagree	No need.
Disagree	Should only be implemented if all public transport becomes able to accept cashless payment.
Disagree	Atms everywhere. No need.
Disagree	Cash is king
Disagree	They theses lads operate freely. We built this country with liberal ideas. Respect.
Disagree	cash is legal tender.older customers use cash.scams are rife.more expense and making more profits for banks.just because it suits the woke i and include the policy makers doesnt make it right.just another nail in the coffin of decent people and pandering to the irresponsible .20e cash and ur sorted
Disagree	Card payment is not secure for taxi driver .they had no money when they arrived !!! Also they say they will the card .when I arrived .they legging out the taxi
Disagree	I agree with cashless payment but not the penalty if machine is not working. Please investigate cloned cards and stolen cards. Once the payment approved it can not be cancelled later by the customer. The customer must go through normal procedures
Disagree	If cash is still accepted then no objection
Disagree	Failure of payment systems on a local or wider scale, cyberattack, areas with no or poor signal coverage and areas with no or poor wifi coverage.
Disagree	The taxi regulation says the passenger must have the ability to pay the taxi fare that relegation will be certainly weakened or perhaps no longer apply if it becomes mandatory and it will be open season on taxi drivers to be scammed by customers knowingly hiring a taxi and their card will decline. The regulator says a taxi drivers cannot charge on personal cards i.e. A.I.B / bank of Ireland and others so the driver takes the loss. The Banks charges is in and around 2% on personal cards for example on a €20.00 fare the driver loses 40 cent and so on this is on top of losing their gratuity using card readers. Drivers are reporting up to 95% of their gratuity being lost when being paid by card. Dublin airport some drivers have stopped working the airport and did not renew their permit due

	to the enforcement of card readers the D.A.A did not make any allowances for any driver who has not caught up with modern technology or for the natural phase out of the older taxi generation.
Unsure / no clear position	I reserve judgement on the mandatory use of card machines until i see what proposals are made for the validation of customer cards PRIOR to conclusion and payment of a journey
Unsure / no clear position	I have cashless facility however older drivers might find hard to use and also quite discriminative since hairdressers, beauticians, barbers, car wash , tyre company do not have to provide cashless facilities and refuse point blank to provide it. All industry should have too comply.
Unsure / no clear position	Not sure how this will work in view of the availability of the method by all Taxi Users (especially the older ones).
Unsure / no clear position	when u intrduce the cashless payment scheme please do make sure that there shuld be a charge for it as we r paying a commission and there is a monthly payments as well for the Terminal. Thanks
Unsure / no clear position	if implementation of cashless payment happens make sure the additional payment should be paid for the drivers as they have to pay the commission for the card payment.
Unsure / no clear position	Many people don't have card!!
Unsure / no clear position	Will not work properly all the time, technology is not 100% sure
Unsure / no clear position	I have offered this facility for many years now and the only concern I have is that the technology can be very unreliable. You are totally dependent on a good Internet connection and this can vary from time to time and from place to place. The airport is one of the least dependable locations.
Unsure / no clear position	I think it will drive out many of the taxi operators working on a part-time/flexi-time basis and could over the long term make the industry more professional which is very much in the gig industry territory without the leadership of strong taxi companies who promote good customer focused standards.
Unsure / no clear position	I already take card but we'll overdue fare increase Diesel prices
Unsure / no clear position	There needs to be clear regulations in place as to what legal safe guard the driver has and what procedure is required by the driver if payment of the fare is not processed or rejected by the passengers Debit /Credit card similar to a passengers legal obligations if they refuse to pay a cash fare.
Unsure / no clear position	Probably too early. Should be in line with other businesses. Should be like any other till, the customer may choose the payment method.
Unsure / no clear position	I agree wit card I've never refused card payment but I have been in the situations were cards have been declined we need to be solute someone has sufficient funds to pay
Unsure / no clear position	It should be opened to anyone whether they want it or not
Unsure / no clear position	I am unsure, as I assume there are still many people possibly older people who do not use bank cards to pay for everything

Unsure / no clear position

Currently non-payment of cash fares in many cases results in a visit to a local Garda Station and in most of the cases time lost and indeed payment are never recovered. This is causing difficulties for drivers whereby in the case of cashless payments a declined card will mean funds are unavailable. Many systems Hotels, Fuel Stations and other providers offer a pre-payment system with the card being authorised initially. It is vitally important that operators be paid for their services with payment guaranteed and the NTA who is introducing this mandatory payment ensure operators are fully protected. Another concern raised centres around technology. Operators currently providing cashless payments have had issues with mobile phone networks and signalling resulting in a payment by cash where available with time lost due to a trip to the nearest available A.T.M. Another difficulty raised by members is with payment by multiple passengers in vehicle wishing to pay separately by card with the driver paying multiple merchant costs and fees for the one trip. Considering the current age profile of the industry many operators are simply not tech savvy and will need upskilling prior to the introduction of cashless payments to best offer their services

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