

Regulatory Consultation Report

Public Consultation on Draft Small Public
Service Vehicle (Emergency Measure COVID-
19) (Fees) Regulations 2021

This report details the following in
relation to the Regulatory
Consultation on Covid-19
Emergency Measures:

- NTA's Statutory
Responsibility
- Background
- Consultation Overview
- Submissions



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1. Introduction

1.1 NTA and Regulatory Function

The National Transport Authority (NTA) is the transport authority for the Greater Dublin Area and the public transport licensing agency for Ireland.

As part of its public transport licensing role, the NTA is responsible for regulation of the small public service vehicle (SPSV) industry in Ireland.

As part of this regulatory function, and in accordance with Section 7, Licensing regulations, of the Taxi Regulation Acts 2013 & 2016, NTA may make regulations in relation to the fees charged in respect of applications for licences and other matters relating to licences.

“(1) The Authority may make regulations (“licensing regulations”) in relation to the licensing of—

(a) small public service vehicles,

(b) drivers of small public service vehicles, and

(c) services involving small public service vehicles (including dispatch operators).

(2) Regulations under this section may in particular and without prejudice to the generality of subsection (1) provide for all or any of the following:

(g) the fees to be charged in respect of applications for licences and other matters relating to licences;”

1.2 Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021

To assist the SPSV industry, which has been decimated by the COVID-19 pandemic and to retain a supply of SPSVs for the travelling public nationwide in the future, the Minister for Transport has confirmed that funding will be made available to NTA to waive the vehicle renewal licence fee for the calendar year 2022 (currently €150 for non-wheelchair accessible vehicles and €75 for wheelchair accessible

vehicles per annum). This is expected to encourage more operators to remain licenced/available for licensing and stay within the industry pending a return to normal market operation.

In December 2020, the NTA Board enacted regulations to facilitate a similar waiver of standard renewal fees and waiver/reduction of late renewal fees throughout 2021. It is proposed to continue that for 2022.

Currently, fees for the late renewal of standard licences are waived. It is proposed that the fee of up to €500 will continue to be waived in full until 30 June 2022 with a reintroduction of a lesser fee (equivalent to a standard renewal fee) thereafter to ensure that operators are encouraged back to service and that the testing infrastructure of the NTA's vehicle inspection contractor is not overwhelmed.

The Department of Transport has confirmed that funding of €3m will be made available to the NTA for 2022 to offset the loss of licence fees.

1.3 Additional Consultation

In addition, the NTA has proposed a further exceptional COVID-19 provision, the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021, in relation to the replacement of expired licences. This would amend Regulation 17 of the Taxi Regulation (Small Public Service Vehicle) Regulations 2015. Currently SPSV licences must be replaced within 12 months of the licence entering an expired status. Should the proposed measure be introduced into law, an SPSV licence may rest in expired status for a period of 24 months, after which it can no longer be replaced. This is a permanent amendment to the current Regulations and, as such, benefits can be availed of by all SPSV licence holders.

This proposed provision is also subject to a separate public consultation exercise.

This report is focused on the findings from the consultation on the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021 only.

1.4 Structure of this Report

The structure of this report is as follows:

- Section 2 outlines the current regulation on SPSV licensing fees (Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015);
- Section 3 outlines the public consultation overview;
- Section 4 outlines the submissions made; and
- Appendix A provides a copy of the submissions

2. Background

2.1 Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015

NTA is responsible for regulation of the small public service vehicle (SPSV) industry in Ireland. As part of this regulatory function, and in accordance with Section 7, *Licensing regulations*, of the Taxi Regulation Acts 2013 & 2016, NTA may make regulations in relation to the fees charged in respect of applications for licences and other matters relating to licences.

Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 specifies the fees payable in respect of the renewal of an SPSV licence for both six and twelve month licence periods. The annual SPSV licence renewal fee currently stands at €150 for non-wheelchair accessible vehicles and €75 for wheelchair accessible vehicles, however licences held in respect of vehicles which have reached their 10th anniversary of initial registration, must be renewed every six months at pro-rata rates.

Other fees include late renewal fees and fees associated with SPSV inspections.

As at 30 June 2021, the SPSV fleet comprised 21,736 taxis, hackneys and limousines in active and inactive licence status (i.e. eligible to be renewed). NTA temporarily waived standard renewal fees for 2021. To further assist the SPSV industry, which has been devastated by the COVID-19 pandemic, and to retain a supply of SPSVs for the travelling public nationwide in the future, the Minister for Transport has advised that funding will be made available to NTA to waive standard vehicle licence renewal fees for the calendar year 2022. The intention of the 2022 renewal fee waiver is to keep operators attached to the industry through financial assistance, supplemented with regulatory, technical and health guidance measures.

2.2 Purpose of Proposal

The purpose of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021 is to give effect to a renewal fee waiver by temporarily amending the renewal fees referenced in Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015

through a standalone, time bound clause for the calendar year 2022. This amendment is intended to be made as an exceptional provision and emergency measure resultant from the COVID-19 pandemic, noting that public transport, specifically including small public service vehicles, is deemed by Government an essential service.

The terms and conditions applicable to SPSV inspections including those governing cancellations and no-shows, will also be amended in light of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021.

NTA temporarily waived late renewal fees (up to €500) from 28 March 2020 to 12 June 2021. After this date, a reduced late renewal fee was to be payable in respect of renewing an expired SPSV licence until 31 December 2021. If these Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021 are approved, this waiver date for late fees will move to 30 June 2022, after which date, a reduced late renewal fee will be payable in respect of renewing an expired SPSV licence until 31 December 2022. SPSV licensing fees will revert to those set out in the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 for all renewal fees on 01 January 2023. Currently SPSV licences must be renewed within 12 months of the licence entering an expired status. A separate consultation is underway to extend this period to 24 months.

As part of this assistance package, SPSV Motor Tax and initial SPSV NCT fees will also be funded by the State for a 12 month period.

3. Consultation Overview

3.1 Online Submission Form

On 18 June 2021, NTA published the Draft Small Public Service Vehicle (Emergency Measure COVID-19) Regulations 2021, together with the information detailed in section 2 of this report, on the public consultation section of NTA's website. Also on that day, a text message was issued to 17,369¹ SPSV vehicle licence holders notifying them of the public consultation. Representations on the Draft Small

¹ This figure is lower than the total number of SPSV vehicle licences as many individuals/companies hold a number of vehicle licences and received a single notification.

Public Service Vehicle (Emergency Measure COVID-19) Regulations 2021 were invited from any interested parties via the submission form on NTA's website. The period of consultation ran from 18 June 2021 to 9 July 2021 inclusive. NTA also consulted directly with the Department of Transport, Tourism and Sport and the Advisory Committee on SPSVs.

A total of 429 submissions were received during the consultation process. All submissions received have been referenced in this report.

Submissions were received via an online survey published by NTA on its website. The online survey contained four response fields:

- Name
- Email address
- Opinion: this was in the form of a two option drop-down menu:
 - I agree with the Draft Regulation.
 - I disagree with the Draft Regulation.
- Other comments (which was a free-text field, restricted to 300 words).

Online Submission Form - Example

Draft Regulation

[Draft Small Public Service Vehicle \(Emergency Measure COVID-19\) Regulations 2021](#)

Your Name (required)

Your Email (required)

Opinion

Comments (max 300 chars)

Submit

3.2 Reporting

An MS excel file containing all responses to the public consultation was downloaded from the consultation site and the following three activities were undertaken:

Data cleansing

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

Duplicate submissions were identified where personal details (i.e. name and email address) matched.

The following approach was taken for duplicates:

- Matching opinion and matching comments from the same respondent – one record was removed.
- Matching opinion and more than one comment from the same respondent – comments were amalgamated to create one response and one record was removed.
- Mismatched opinion (with or without comments) from the same respondent – both records were retained as it was not possible to infer the intended opinion.

This resulted in an MS excel file containing 395 responses for coding and analysis.

Identifications of Trends/Themes

An initial analysis was undertaken to identify the common themes emerging and matters raised within the free-text comments.

Data coding

All submissions were read, interpreted and coded against the themes that emerged following a review of the submissions.

In a small number of cases, respondents' comments contained more than one theme and all themes were coded.

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

4. Submissions

Introduction

Following the cleansing of duplicate submissions a total of 395 people responded to the public consultation on Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021.

4.1 Overall Opinion

The vast majority of respondents (95%; n=377) agreed with the proposed amendment to the regulation and a small minority (5%; n=18) disagreed.

Opinion	Number of Respondents	% of Respondents
Agree	377	95%
Disagree*	18	5%
Total	395	100%

*On reviewing these submissions it was noted that 10 of the 18 respondents who selected 'disagree' when completing the online submission form, agree in principle with the proposed regulations.

4.2 Additional Commentary

Over one-third of respondents overall (39%; n=156) provided additional comments alongside their view of the proposed amendment while over half (61%, n=239) did not.

Additional Commentary		
Included Commentary	156	39%
Did Not Include Commentary	239	61%
Total	395	100%

4.3 Matters Raised by All Respondents who provided Additional Commentary

The table below illustrates the themes and matters raised by all respondents from the 156 respondents who provided additional comments.

Themes/Additional Commentary	Agree	Disagree	Total
General Comment	59	10	69
Positive Feedback	51	0	51
Maximum Permissible Age	34	9	43
Insurance Costs	12	0	12

Licensing Fees	9	1	10
Personal circumstances	8	4	12
Finance Package	7	4	11
Other	11	2	13
Totals	191	30	221

4.4 Key Themes – Respondents who Agreed

The table below illustrates the number of occurrences by theme of respondents who agreed to the proposal and also provided commentary. It is noted that the majority of respondents choose to comment on other matters than the specifics of the draft proposal.

Themes/Additional Commentary	Agree
General Comment	59
Positive Feedback	51
Maximum Permissible Age	34
Insurance Costs	12
Licensing Fees	9
Personal Financial Circumstances	8
Financial Support Package	7
Other	11
Totals	191

Key observations are:

- The majority of commentary that accompanied 'agree' submissions could be categorised as general commentary with some respondents noting that the proposal was timely. Other respondents included queries within their submissions, however it was noted on the consultation web page that queries would not be responded to on an individual basis.
- A notable proportion of respondents provided positive feedback within their commentary, at times displaying gratitude for the efforts being made in support of the industry.
- Many of the comments included reference to the Maximum Permissible Age and called for further extensions in this regard with some respondents stating their vehicle was due to reach its end of life in 2022.
- Some respondents cited the cost of insurance being one of the main running costs, especially so when they ceased/reduced operation.
- A small number of respondents referenced change of vehicle fees and driver licence renewal fees within their comments.

- Personal financial circumstances were also included within commentary which varied from mentions of supports such as the pandemic unemployment payment to repayment of loans and the availability of finance.
- A small number of respondents made reference to financial support packages.
- A small number of respondents made comments relating to a variety of topics such as licensing fees, fares, transferability, private hire vehicles and grants.

4.5 Key Themes – Disagreed

The table below illustrates the number of occurrences by theme of respondents who provided commentary.

Themes/Additional Commentary	Disagree
General Comment	10
Maximum Permissible Age	9
Personal Circumstances	4
Finance Package	4
Other	3
Totals	30

Key observations are:

- Similarly to the above the majority of commentary that accompanied disagree submissions could be categorised as general commentary.
- A number of respondent’s comments included reference to the Maximum Permissible Age and called for further extensions in this regard.
- Personal financial circumstances and a finance package were also cited by some respondents that disagreed with the proposal.
- A small number of respondents made comments relating to licensing fees, private hire vehicles and grants.

4.6 Recommendation

Given the overwhelming percentage of agreement with the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021, it would appear this proposal would be of substantial benefit to SPSV industry members considering the continued adverse impact of the COVID-19 pandemic.

Also taking into consideration the support of both Minister Ryan and the Department of Transport it is recommended that this proposal is approved by the NTA Board.

Appendix A

Submissions with Commentary	
Opinion	Commentary
AGREE	Well done.
AGREE	My limousine business went out of business last year and my license then went out of date. Does this now mean I can still use my limousine license until 2022 as long as my insurance and everything is up to date.
AGREE	What ever comes in this situation is welcomed. Big thank you.
AGREE	I agree but think more should also be done to help drivers especially older drivers
AGREE	I believe should be a big help to many in the business. This is a time we really could do with any help possible to keep our industries going in uncertain times.
AGREE	Also age of vehicles should be extended as finance is hard now to replace older cabs.
AGREE	I have just taxed and nct my car my licence is due 9 sept am I entitled to these changes also can I suspend licence
AGREE	Please consider extending vehicle age limit as this would be very helpful to drivers as it will be very hard to source finance. As an additional measure please extend the vehicle age limit to keep drivers attached to the industry as it will be very difficult to access finance post covid.
AGREE	Nice job, thanks for the assistance.
AGREE	This would a big.help to all operates in the industry.
AGREE	But i would prefer to see the 10 year rule extended, as a single vehicle owner operator for me the extension of the 10 year rule is the difference between staying in business and social welfare. John O'Shea Ennistymon Co. Clare H15761
AGREE	This is of great assistance to drivers, I look forward to the draft regulations being approved. This will encourage many drivers to recommence work.
AGREE	I also feel cars over 10 years of age road worthy and found suitable should be extended beyond their operational life in order to allow drivers remain in an industry devastated by covid
AGREE	Increase max age of taxi to 15 years
AGREE	Every little helps. As I stated previously would be good if the renewal was left at 12 months for all age vehicles as the mileage done by active licenses now is way below the normal.
AGREE	I agree with Draft Regulation
AGREE	I'd like to see fees from late 2020 refunded if you could prove that you haven't worked and haven't been in receipt of PUP. I'm a full time paye earner who usually works part time at weekend but haven't worked since 17 March 2020, but have still had to pay to keep my active taxi legally on the road.

AGREE	We could do with another 1 year extension for older cars. I won't be able to get finance for a new car. That will put me out of the industry and on the dole.
AGREE	Taxis should be back to the 15 year replacement rule
AGREE	Good idea
AGREE	Also the ten year rule for taxis should be looked into seriously because this a heavy burden on taxi drivers finances.
AGREE	What about extending the age of the car
AGREE	We need all we can get.
AGREE	Thanks a lot for this proposal, however it will be great to address the high cost of taxi insurance premium as well. Thanks
AGREE	You should also waive the nct fee for all spsv licence holders during this pandemic I have to pay nct fees twice yearly with no income
AGREE	That's brilliant, will make life easier
AGREE	Thus package is no good what about our insurance we pay which is big money no package for that all this package is worth per driver is only a little over 300 euros that's no good
AGREE	Waiver should be until 31 Dec 2022
AGREE	The taxi insurance is an issue as its still must be maintained in order to avail of full no claims bonus. No relief . Big burden. Thanks for help as its timely and considerate. JF
AGREE	Yep and insurance is aslo major problem and no give on insurance part even that most of years not any work
AGREE	..all very good news (the suitability test is my annual nightmare plus the constant increase in insurance..ie 810€ in 2011 to 2560€ in 2021)....??
AGREE	The draft regulations are very good and thanks for thinking of us but the biggest thing for me is the extra year on a psv vechice, as iam now a year behind on my loan repayments on my car ,which is due to change next year 22 , I can't get a loan nobody will touch TAXI drivers even mirco finance Ire
AGREE	Any help is greatly appreciated; Any help in these times is appreciated
AGREE	It is good to see that, we the taxi industry are finally been helped, the same way as other small businesses. Every little bit helps.
AGREE	Please allow to sell taxi plate if I want to exit
AGREE	We are in unusual circumstances
AGREE	Good idea ,now please allow all taxis to stay on the road for up to 15 years not 10
AGREE	We want the age limit on our car increased from 10 years to at least 15 years..10 YEAR RULE IS DISGRACEFUL..
AGREE	Any waiver is welcome ,the after affects will be with us for a while.
AGREE	Great

AGREE	I think any help that can be provided, is essential because a lot of people are getting out of the industry.it's been a horrible time both financially and mentally for everyone.
AGREE	Any scheme that helps the financial stability of taxi drivers is most welcome. Thank you
AGREE	The taxi industry is a mess and I personally cant see myself staying in it all fees and regulations and just simple maths to many taxis and not enough work even pre covid19 it was getting bad.
AGREE	This is an excellent idea
AGREE	I agree with the new measures.
AGREE	Totally agree with this amendment,However a 5 year extension to the life of a vehicle would help drivers to recoup there losses during the pandemic and help them save and plan for new vehicles.
AGREE	Its the minimum they can do
AGREE	The24month extension for renewal of taxi licences would be a Godsend to me as I am recovering from a serious illness. James.
AGREE	Very much appreciated, zero cost , but a great help in dealing with pandemic; This would really help in helping coping with effects of the pandemic. Very much appreciated
AGREE	Thanks
AGREE	Please bring the age of car to 11 years, before change.
AGREE	This measure will help the struggling taxi industry but a great help would be to further extend the end life of operation of cars for one more year for renewal in 2022
AGREE	Any help at this time is very welcome
AGREE	Any help is good help,the industry has taken a severe knock,an all financial help to keep taxi drivers working is welcome.
AGREE	Agree 100%
AGREE	The late renewal penalty fees should be waived for longer because some drivers are still not back at work and may not be for a long tome
AGREE	It makes sense to assist drivers through these times
AGREE	It's not a enough more should be done about the age of the vehicle at least 15 years should be more than enough
AGREE	All taxis should be allowed to be at least 15 years of age, no cost to taxpayer no brainer
AGREE	Thank you
AGREE	Good work
AGREE	Should also include cars
AGREE	All measures are helpful and appreciated.

AGREE	Yes I agree with this. I have also been unable to save any money during the pandemic to renew my vehicle which expires in three years. I will never make that money back again and as a Carer for my son I can only work part time. Please extend vehicle age limits. Liam Dunne.
AGREE	With no encome this last year you need abreak
AGREE	The age restrictions on taxis (ie 10 year rule) should also be extended for the foreseeable future (3-5 years extra)
AGREE	I agree with draft regulation
AGREE	MORE NEEDS TO BE DONE ON THE 10 YEAR REGULATION THERE ARE VERY GOOD CARS THAT ARE PUT OUT OF SERVICE
AGREE	We need all the help we can get
AGREE	Badly needed to keep drivers in the industry
AGREE	You want to do something about insurance
AGREE	I agree with the 24 months for inactive licence I also want an extension of the vehicle age to 15 years for all small psv.
AGREE	I fully agree with this amendment
AGREE	It's about time so decent financial packages are being looked at
AGREE	Yes I'm happy with that But I wood like to no where I stand with the 10 year rule and why not make it 12 years. As for all taxi drivers we have lost one year of income . And no savings. At least give us a chance to make a living and not end up on the welfare. Tks.
AGREE	Any help would be grateful; Extend 9 year rule with only one nct a year,2 is so stressful
AGREE	Yes this would be a great help.
AGREE	This is a good move , this industry needs a lot more attention as this industry is the most affected directly due to Covid 19 , needs to bring more and more options to make things easy for the license holders
AGREE	When will motor tax and nct fee be refunded
AGREE	Please extend veichle age limit
AGREE	It will be a great help
AGREE	I had no choice but to leave my licence lapse. When covid came in all my work dried up. Still have no reps visiting company's in irl. I was not even making the price of my insurance not including any other bills.
AGREE	This would ease pressure on drivers and take some stress off there shoulders

AGREE	THE REGULATOR MUST EXTEND THE 10 YEAR RULE, TO AT LEAST 11 YEARS, BUT 12 OR 13 WOULD BE BETTER. THESE MEASURES CAN BE REVIEWED IN 2023. DRIVERS WILL OPT FOR SUB STANDARD REPLACEMENT VEHICLES IE CHEAPER, SMALLER AND LESS. WELL EQUIPPED VEHICLES THAT ARE NEWER, BUT ALOT LESS SUITABLE FOR TAXI USE.
AGREE	Would be highly welcomed in the toughest times I think our industry have ever faced
AGREE	The industry is on its knees all taxi drivers need as much help as possible financially and with 10 year rule now 11 this could be another option to help us out if the car passes a Nct and Sgs I can't see why this option can't be sustained for the coming future during these pandemic times.
AGREE	Great will help us to get back to work at little cost
AGREE	All help welcome
AGREE	Could you also please consider freezing taxi fares till at least 31/12/2023 to give certainty to customers and entice them back into using spsvs.
AGREE	I feel the waiving of fees is a step in the right direction bit alot needs to be done to eliminate unlicensed holders from the streets I work in belmullet co mayo sadly enough 4 plates have expired there inside 3 years but there is now 4 illegal drivers on the street
AGREE	It is just right at this difficult time.
AGREE	I think all licences should get a two year extension because of lack of ability to earn during pandemic.
AGREE	Great idea to help the worst hit industry.
AGREE	Most of SPSV license holders are clamouring to appeal to NTA to negotiate about Insurance costs for TAXI in Ireland to know how reduce their prices.
AGREE	Great idea it give taxi drivers a bit of positivity for the future from the NTA.
AGREE	Thank you the renewal fee waiver.
AGREE	Any initiative to put money back in operators pockets is a good thing.
AGREE	Will be extremely helpful to the industry at this very difficult time..
AGREE	Extension must be given to the old taxis in 2022.
AGREE	I think it is right and proper for the help of spsv operators for the difficult period we have had to endure.
AGREE	The 5 Demands that all four Taxi representative groups have asked the Minister for transport and the Taoisheach and Tainiste must be implemented ASAP
AGREE	Yes, spsv drivers need this help

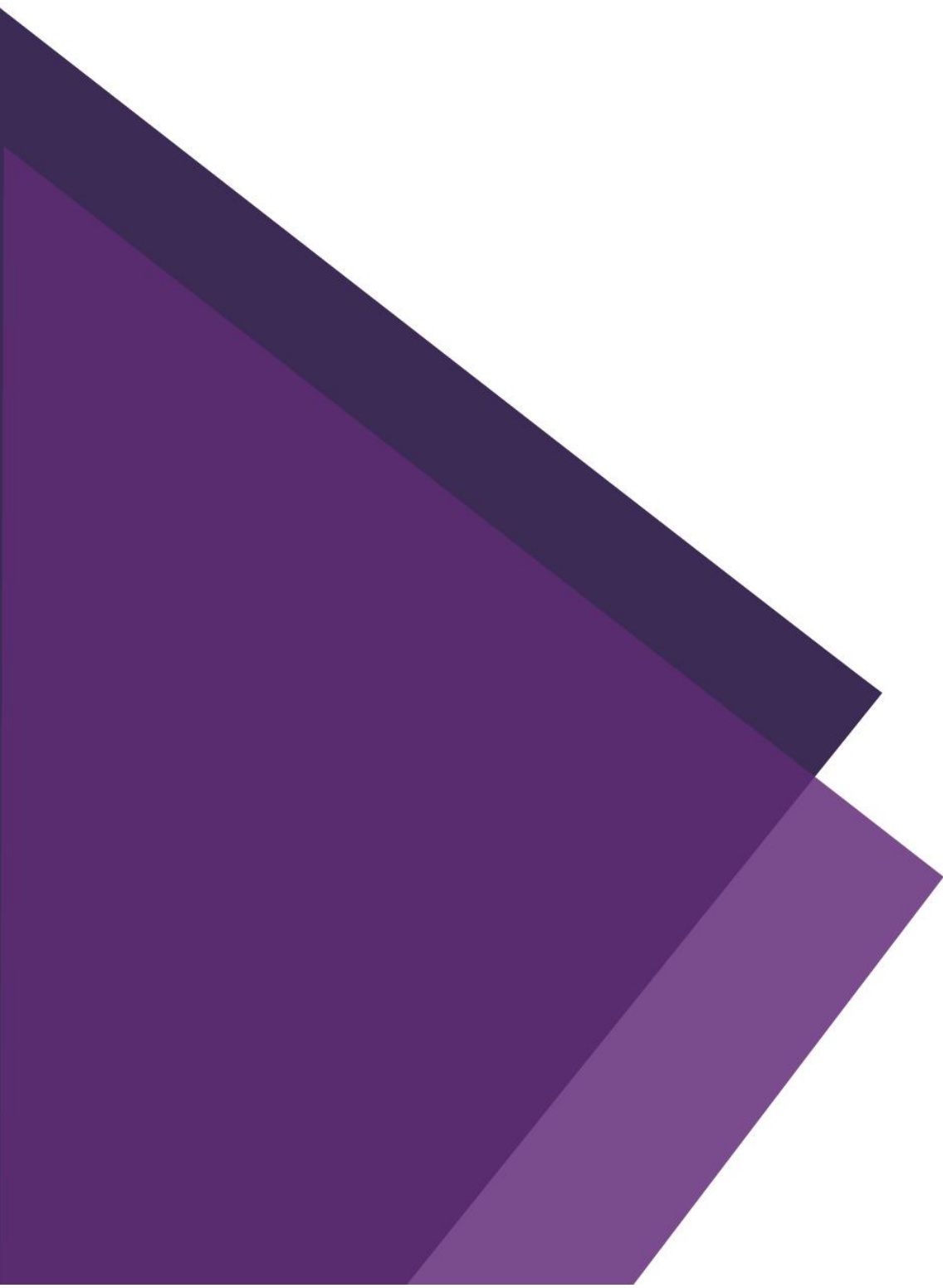
AGREE	It's very important in my opinion that the vehicle age requirement be extended by at least TWO years, because 90percent of the fleet have been parked up for almost 18months and counting . Many thanks.
AGREE	I feel that the NTA should have a consultation process with a representation of taxi drivers when they are looking to implement changes to discuss the impact and fairness of changes to conditions Thank you
AGREE	Operating in Dublin will be totally uneconomical until such time as tourism figures reach over 75% and pubs and clubs and sporting venues get back to near max capacity. This could take two to three years.
AGREE	What would be of most benefit to our business is if NTA would deal with the insurance industry as most people in my position have been forced to pay for very expensive policies while not operating (€2000) and it's due again next month and as I have not had any business since February 2020
AGREE	OK by me
AGREE	i agree that 24 months needs to be put on licence expiration due to the covic 19 .
AGREE	U need to scrap 10 year rule
AGREE	Any help at this point is very good . Unpredictable days with very little earnings and no matter what insurers say,they are lying and need to be called out in this as they give no discounts ti working taxi drivers .
AGREE	How about extending the vehicle licence to cover 2022 that would really help hard pressed drivers to find a way through the rest of 2021 and 2022.
AGREE	Dziekuje
AGREE	Also to change to new cars over the fee should be waived.
AGREE	Any measures to help the taxi industry would be very beneficial received
AGREE	As a night driver the work simply is not there and every financial assistance is appreciated during this pandemic to encourage driver owners back into the industry, Regards, Gerard O Flynn
AGREE	please also consider fee waiver for change of vehicle circumstances.
AGREE	Give us another 12 months on car anniversary
AGREE	I have agree with the Draft Regulation, i would also like for the age of vehicles entering their final year to be extended by another year at least. Also grants for purchasing Hybrid vehicles be extended to SPSV drivers as EV vehicles are very expensive still. I totally agree with these measures.

AGREE	Nta should buyback plates at initial Price then allocate to suitable applicants .Cost neutral to exchequer. Older Drivers retire peace mind feel appreciated and costs of Funeral Covered.Practical way Forward.Please give consideration to say Thank You for Years of loyal service to Public Happydeath
AGREE	Ok
AGREE	Yes I aree with the draft
AGREE	Once again I commend you for taking measures that will ease operators stress in this difficult times
AGREE	This would help greatly to stay with the industry still fell very vulnerable at this time
AGREE	much needed little help.
AGREE	A vehicle who's life as a taxi expires during December 2021 will atomically receive a 12 months licence extension, while my vehicle who's lifetime expires, 3 months later in April 2022 won't, it is disqualified. I cannot get fiance, a car loan or a bank loan to put a new car on the road !!! If an extension of, a minimum or at least a year, to my vehicle licence, I will have to leave the taxi business, having worked for almost 30 years as a full time taxi driver, as my father did before me !!! A car whose licence expires in December 2021, will receive a 12 months extension, while I won The lifetime of my car comes to an end in April 2022. I have no savings, having not worked during the pandemic. I cannot secure fiance for a new vehicle and no bank will lend me money or give me a loan. I will have to leave the taxi business, having worked as a full time taxi driver for almost 30 ye
AGREE	Any and all help in these unprecedented times is very grateful. While here I ask again that the NTA review the 10 year rule and change it to 15 years across the fleet going forward. Not as a temporary Covid measure. The taxi industry is in flux, and will not bounce back in the near future.
AGREE	While it doesn't go far enough it's a start
AGREE	Maybe no fees for change of vehicles would be a big help
AGREE	Ten year rule should be scrapped all Taxis should be 15 year age limit
AGREE	Yes I do agree but I can't understand why there is a extra charge for wheelchair vehicles versus non wheelchair vehicles as really it all the same it's a psv license one way or another doesn't really matter the type of vehicle its on.
AGREE	Yes all renewal and late fees should be abolished for duration of COVID-19

AGREE	5 Yr psv should be free. Age of vehicle extended. 5% Fare increase already passed implemented. Benefit should only be allowed to individual drivers. company should not benefit more. Not enough support for drivers NTA not concerned enough for drivers. Treating reps disrespectful
AGREE	Hi yes I agree , and it's much appreciated support to the industry is always welcome , now some help with the grant ,
AGREE	I haven't worked my taxi since March 2020 and therefore I think this would prove to be of big assistance in getting this designated industry back up and running.
AGREE	It isn't enough to cover tax and NCT fees as some drivers have no means to cover 3000 eur insurance in order to tax the car!
AGREE	Taxi need a longer extension on the 9 year rule
AGREE	Taxi costs are way to high for the very small return from taxi work now plus the dangerous occupation it now is. thank you.
AGREE	waiver date for late fees should be moved to 31st of December 2022.
AGREE	This proposal gives concrete support to a hard pressed industry sector at a time of economical strain. Maintaining connectivity to the industry for those who may not be currently economically active in this domain and will assist their return in more favourable time.
AGREE	When does the wafer for car tax and nct come in had to pay both this month ☹️
AGREE	Yes I believe that it is much needed in the current circumstances
DISAGREE	A plethora of useless legalistic jargon, as usual from NTA. Just like so called grants for electric cars, where drivers have to borrow full cost of vehicle up front, then wait for grant at NTA's discretion. Not a word about any financial covid help to drivers over 66.
DISAGREE	Extend life of licence to 15 years I already benefit from this and just completed 2nd inspect . Check SGS comment on 23273
DISAGREE	I have 2 years payments on the car I have and have been paying for the last 2 years most during the covid pandemic with the 10 year rule I have 3 months left with the car after the payments on it are finished the car is in perfect condition
DISAGREE	Been out of work due to fear of catching covid. Planning on going back but not enough is been done great that we can get the p.u.p. and work but only limiting it to €960 ovr 8 weeks is a joke so were allowed earn €120 euro a week after expenses how can u live off that and pay for a car and rent a ho

DISAGREE	All vehicles regardless of age should be subject to an NCT and suitability test every twelve months and not the ridiculous six months in force at the moment. National transport authority and the regulator have annihilated the PSV private hire industry beyond recovery
DISAGREE	Not enough! License extensions needed!
DISAGREE	disagree completely as part of the minister f transport minister Ryan the legislation he put out last week such as nct tax and sgs so why did I have to pay f my nct on 18.06.2021 explain this please
DISAGREE	This exemption of fees needs to be extended by another 2years And nine year rule needs to be extended to 12 years to allow drivers Get back to normal business
DISAGREE	I think there should be some type of grant up to at least €5000 for drivers due to lost of business and earnings since the pandemic started I haven't worked and still can't.
DISAGREE	Let's go back to normal Pre covid, I'm done with all of this Thanks
DISAGREE	We don't a break on lapsed licenses or have it extended. We need the nine year rule on cars extended so we can build up credit history there fore to give us the ability to change in the future. Once our cars are in excellent condition this should not be a problem.
DISAGREE	Licence fee and late renewal fee reductions will not mean a jot to driver's if 1 their car reaches ten years old or 2 they can't obtain finance to replace it. Extending 9 yr rule to 15yrs is the only real way of helping driver's.
DISAGREE	Fao Min Ryan I disagree with the Draft legislation Especially with regards to the 10 year rule Also with respect to the waiver of the Nct fees for the next 12 months Will the NTA confirm this with the NDLS as they are not aware of the situation△ Regards Mervyn Jones 0871975034

DISAGREE	The gov.needs to look at this industry again as we are essential workers and what has been proposed is devastating for us.our business is destroyed and i personally feel more can be done for the drivers.
DISAGREE	Any of the proposals made are of no benefit to me as my car will be 10years on 8th 22 so I will have to quit the business after 30 years there was no Consideration of my taxi being off the road for 15 months



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Dún Scéine, Lána Fhearchair
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