

**From:** George Beresford  
**Sent:** 19 March 2018 21:34  
**To:** Jim Whitelegg  
**Subject:** Uber relicense

Dear Licensing Panel

My name is George Beresford. I am the representative for Independent Taxis Drivers. This document is for, and on behalf of those drivers.

After having UBL (Uber Britannia Limited) operate in Brighton for more than 18 months now, I'd like to present the issues that have arisen in this short time.

- UBL have software (Greyball & Ripley) to help evade compliance. This software has been found to be used on more than one occasion in the UK. I am aware that UBL have promised they won't use it in Brighton. They also promised they would only use Brighton & Hove cars in Brighton, however, we are all aware that this is not the case.
- On their initial licence application they stated they would only use Brighton & Hove (B&H) licensed drivers, as we are all aware that is not the case, and when questioned on this, they claim they do only use B&H drivers on their operator's licence. This is not what we all had in mind and I'm sure the council agree.
- I constantly receive screen shots of Uber's proposed routes, which show convoluted routes. I know if I were to take customers the long way round I would be answerable. This however is not the drivers' wrong doing, this is UBL taking money from your rate payers' pockets unnecessarily. I realise there is a possibility that no complaints have reached the HCO from the general public, but does that make it right? Surely if BHCC are aware of this problem not being a one off, should you not be bringing UBL to task?
- Lack of insurance and the use of on off hire and reward insurance, where drivers leave the hire and reward off so as to save money, is an ongoing issue. This problem was unheard of before UBL began operating here. I feel sure in stating that on off hire and reward insurance is not used by any B&H driver.
- You should all be aware of the amount of drivers that are sleeping in their cars night in and night out. This is well-documented and still an on-going problem, creating both public hygiene and safety issues.
- UBL have put in new measures for driver-safe working hours. All drivers can work for 12 hours booked in to jobs. This means those hours are only counted from accepting the job until the passenger is at their destination.

For me to work 12 hours under this module, I could be on the road for over 30 hours without taking a break. I feel UBL are trying to make the public believe they are doing the right thing but the truth is, they still have a public safety issue here.

- Over 10 months ago, UBL told the trade and BHCC they would geo-fence all the ranks so to bring an end to the frequent abuse of our ranks by their out of town PHVs ( Private Hire Vehicles). This issue causes great animosity within the trade. I can safely report we are still waiting for UBL to fulfil this promise and photographic and complaints to the HCO can be provided upon request.
- UBL claimed that their B&H drivers were having their vehicles vandalised so they had actively encouraged drivers to remove all livery light box and even private hire plates, before the much appreciated new bylaws started in January. I witnessed B&H drivers new to UBL on day one, working without livery etc. These drivers and cars were brand new to Uber so I fail to see how they had suffered vandalism. I can only suggest that UBL prefer their PHVs to have no markings, then it is difficult to have compliance enforced on them. Also adding to this point, we find a lot of Uber's out of town cars have removed their PH plates; also TfL cars removing their roundels. Again, photographs and complaints to TfL can be provided. Unfortunately we can only complain to TfL on this matter as they are the only district to provide a vehicle registration number check facility. Our HCO, although aware of this epidemic problem, state that if it is not one of their PHVs, they are unable to do anything. I feel this is a massive issue that could have potentially devastating problems, yet the HCO believe they have no duty of care. I assume going out with the traffic police more frequently is difficult to organise.
- On the 14/03/18 Uber dissected the country into 9 areas, this was after over 18 months of asking them to geo-fence Brighton and Hove. They managed to fence an area that will still allow PHVs from New Forest, over 80 miles away, Slough, 70 miles away and Dover, over 100 miles away. Therefore this strategy will not bring to an end, the cross-border hiring issues.
- As we wave good bye to most of the TfL cars, we say hello to new cars from other areas, meaning the congestion and pollution levels that BHCC are struggling to bring into line with EU guidelines will undoubtedly remain high. A recent study showed that since the rise of ride-hailing apps, 60% of the journeys taken, the passenger would have used a different mode of transport pre, the ride-hailing app. The alternatives being: bus, bike or walk. This research can be bolstered by the fact that TfL lost £1.1bn this last year, due to the lack of people using the tube or bus. Give UBL a licence and

it could be our bus company having to pull its services, leaving the vulnerable without any mode of transport.

I now have several questions that I wish to be put to UBL:

•When applying for your last operator's licence, did you inform BHCC of the data breach you had incurred? If not, can you explain why?

•Uber is known to spend lots of money on lobbying. Did any arm or subsidiary of Uber, lobby MPs for the change in legislation in the cross-border hiring law, pre 2015?

•If Uber has no involvement in the contract between the customer and the driver of the vehicle, who accepts the booking?

•If Uber accepts the booking, how does it have no involvement in the contract between the customer and the driver?

•If Uber considers that a driver accepts the booking, does it accept that the driver must also hold a Private Hire Operator's licence to accept bookings?

•If this is the case, what steps will Uber do to ensure that all bookings are only given to licensed operators?

I thank you all in advance for taking the time to read my document and hope we achieve a more favourable outcome.

Yours Faithfully

