Eduskunnan liikenne- ja viestintävaliokunnalle

Arvoisat liikenne- ja viestintävaliokunnan jäsenet,

Kiitokset vielä mahdollisuudesta tulla kuulluksi Suomen Taksiliitto ry:n edustajan valiokunnan kokouksessa perjantaina 21.10.

Me toimialan edustajina pidämme niin asiakkaiden kuin yhteiskunnankin kannalta ensiarvoisen tärkeänä, että kaikissa ajoneuvoissa on vaatimuksena taksamittari tai vastaava laite.

Taksamittari ei estä mitään laillista kuljetustoimintaa eikä ole mitenkään haitaksi ajoneuvossa. Sen sijaan se toimii kassakoneena, kuten muissakin yrityksissä ja
kun mittari (tai vastaava laite) on EU:n mittauslaitedirektiivin mukainen, niin laitteesta saadaan esimerkiksi verottajan käyttöön arvokasta tietoa. Myös kuljettajan ajo- ja lepoaikalainsäädännön
osalta taksamittari antaa merkittävän edun valvontaan.

Ajoittain taksamittariin liittyen kuuluu kummallisia väitteitä sen hinnasta. Olemme keränneet yleisesti Suomessa saatavilla olevista mittareista hintatiedot niiden myyjiltä.
Taksamittarin myyntihinnat vaihtelevat 795 euron ja 1.420 euron välillä. Mittarin siirtäminen autosta toiseen on mahdollista, kunhan vain mittari täyttää asianmukaiset vaatimukset siirtohetkellä.
Käytännössä tämä tarkoittaa sitä, että ihan 30 – 40 vuoden yrittäjäuraa ei yhdellä mittarilla onnistu hoitamaan, mutta auton vaihtuessa ei likikään aina tarvitse uutta mittaria hankkia.

Taksamittari ei hankintakustannukseltaan poikkea juurikaan nykyaikaisista älypuhelimista, eritoten kun otetaan huomioon taksamittarin merkittävästi pidempi käyttöikä kuin yleisesti
älypuhelimilla on tällä hetkellä. Myynnissä olevat taksamittarit ovat rakennettu autokäyttöön ja ovat rakenteelliselta kestävyydeltään ja luotettavuudeltaan ko. käytössä varsin korkeatasoisia.

Myytävien mittareiden lisäksi meillä on muutamia toimijoita, joiden mittarit eivät ole varsinaisesti myynnissä Suomessa vaan niiden ylläpitäjät eri tavoin hoitavat niiden
vuokraamista. Nämä liittyvät lähinnä tilausvälitysyhtiöiden kokonaispaketteihin, mutta niille on löydettävissä omat hintansa myös kk-hintoina (Megtax ja Sunit).

Puheet kalliista tarpeettomista investoinneista näin ollen voitaneen taksamittarin osalta unohtaa ja keskittyä oleellisiin kysymyksiin.
Veronmaksu ja muut yhteiskuntavelvoitteet on syytä varmistaa myös jatkossa. Meillä ei ole mitään sitä vastaan, että taksamittarin sijaan on olemassa jokin toinen laite tai järjestelmä,
joka hoitaa asian asianmukaisesti, kunhan sellainen ylipäätään on ja vaaditaan kaikkiin ajoneuvoihin.

Myös valvonnan kannalta vaatimuksen yksiselitteisyys antaa käytännössä mahdollisuudet todeta tienpäällä onko asiat kunnossa vai ei. Jos mittaria ei vaadita kaikilta, niin aina voi tarkastuksen
tullen väittää, että juuri minun ei tätä mittaria tarvitse käyttääkään. Millä poliisi tai muu viranomainen sen siinä yhteydessä voisi toisin todeta olevan, jos laki ei ole yksiselitteinen vaatimuksen osalta.

Liitteenä vähän tietoa muualta maailmasta taksamittareiden osalta. Ruotsissa taksamittareiden tiedot tulee vuoden vaihteesta alkaen tyhjentää yhteiskunnan ylläpitämiin ”tyhjennyskeskuksiin”,
Tanskassa on autoissa jopa tunnistin, kun kyydissä on matkustaja, Hampurin osavaltiossa verotettavat tulot nousivat merkittävästi, kun autoihin vaadittiin taksamittarit. Kannattaako meidän
Suomessa toimia toisin ja antaa harmaalle taloudelle vapaa toimintamahdollisuus tältä osin?

Meillä Suomessa taksamittari on ainakin toistaiseksi ja toivottavasti jatkossakin pakollinen varuste. Taksamittarin asentaminen on luvanvaraista toimintaa ja asennuksesta tulee erillinen todistus.

Ystävällisesti

Timo Koskinen
Suomen Taksiliitto ry

Taksamittareiden hintoja (alv 0 %)

Valmistaja	Taksamittari
Semel	1 413 €
Mitax	795 €
Frogne	1 420 €
Megtax*	81 €
Sunit**	60 €

* Meg Tax mittareita saa ainoastaan leasingsopimuksella

** Sunit ajoneuvopäätteitä saa ainoastaan leasingsopimuksella, laitteeseen on integroitu tilausvälityspääte

Timo Koskinen
Suomen Taksiliitto ry

Ongoing controls will prevent cheating on taxi journeys...



Denmark is a pioneer country when it comes to ensuring uniform rules and fair conditions in service sector businesses. Not least in the taxi industry whereby a control device in the taxi cab is an absolute necessity if you want to:

- Make tax evasion more difficult
- Strengthen consumer protection
- Ensure fair competition

In the taxi cab industry, the Danish model entailing a combination of taxi meters, seat contacts and signage in the taxi cab, requirements relating to driver training and affiliation to a taxi call center has produced a solid and reliable system which provides the public with secure and efficient coverage.

The price of a legal taxi meter is no hindrance to either society, the taxi companies or the individual private hire vehicle operator: Approximately DKK 6,000 and upwards for an EU-approved taxi meter that provides society with the best protection possible against tax evasion and unfair competition. By way of comparison, nobody today would dream of removing tacographs from lorries. And, the price of a tacograph typically starts at DKK 8,000.

If the law starts to allow taxi services to operate without some form of control of the actual journey, such as a sealed control unit (taxi meter) installed in the taxi cab as is the case today, the authorities will have no chance whatsoever of checking whether the vehicle is being used for the purpose of commercial passenger transportation. This is tantamount to inviting tax evasion and abuse.

Experience from, for example, the Netherlands, Sweden and Germany, who have, to a considerable extent, given free rein to market forces in the taxi cab industry, has shown that there has been a sharp increase in the number of independent taxi cab drivers operating in towns and cities. This has led to increased congestion and poorer service for customers. There has also been widespread problems with bad conduct on the part of taxi cab drivers. The prospect of being subject to tax controls and service requirements from a taxi call center would deter all but the most serious operators.

The ability to keep tabs on revenues and tax payments is an absolute necessity. Again, experience from abroad shows that, in general, tax revenues increase when better controls are in place. The fact is, tax evasion is widespread when controls are weakened. Therefore, it should be a requirement that revenue can be registered, which we do today by means of a control unit: the permanently fixed and sealed taxi meter.

Meanwhile, it is, of course, important that all operators in the industry constantly follow technological developments and introduce more inexpensive solutions where these are proven to be effective. However, it would be socially irresponsible to bid farewell to a control unit fitted in the individual taxi cab.

The Swedish and German model for viable taxi operation





Experience from the liberalized taxi market in Sweden and the German federal state of Hamburg demonstrate ways to avoid cheating and ensure the payment of taxes in a free taxi market. The solution is very simple; through taxi meters that are linked to the taxi exchange and tax authorities, turnover and profits from each taxi can be checked automatically.

Sweden

Sweden liberalized the taxi market in 1990 with free right of establishment and maximum tariffs. In recent years, large cities such as Stockholm, Gothenburg, and Malmö have experienced an influx of pirate taxis, soaring prices where tourists in particular have been ripped off, etc. Most recently, Uber has tried to establish itself as an alternative to existing taxis.

In Sweden, this form of black taxi operation is frowned upon. It is not just seen as a problem for the taxi industry, but as a threat to the entire welfare state by knowingly channeling turnover from taxis outside of regulatory control.

For the same reason, Sweden will introduce compulsory and automatic reporting of all taxi runs via so-called Accounting Exchanges. These will serve as authorized, independent, businesses that offer taxi exchanges that they can receive, manage, encrypt and forward driving information to the tax authorities on a daily basis.

We in Sweden have also experienced that both trips hailed at the curb and booked trips should be checked in order to avoid a divided market and because taxis perform both public and private driving.

Hamburg

From approximately 2000 to 2008 and in line with the rise of the German economy, the federal state of Hamburg experienced an influx of new, questionable taxi companies that wanted to profit from the favorable market conditions. A growing black taxi market was quickly perceived, as well as a lot of complaints about drivers who would only accept cash, declined to drive short trips, etc. Therefore, city governance launched a project which would re-establish the industry's image, document operations, and ensure the legitimate payment of taxes.

The focal point of the project is sealed taxi meters (fiscal taxi meters), which automatically transfer encrypted driving data to the tax authorities who then calculate the correct tax. With these fiscal taxi meters, there was a 50% increase in tax payments per car in 2014 compared with 2006.

The positive experiences from Hamburg with taxi meter control and automatic reporting will successively be implemented in all of Germany.

EXAMPLES OF TAXI JOURNEYS

Below, there are descriptions of taxi journeys, firstly, of how the journey is undertaken by an authorized taxi cab company (with control equipment in the cab) and secondly, how unauthorized pirate taxis (with no control equipment in the cab) typically circumvent laws and regulations.

PRE-BOOKED JOURNEYS

Authorized taxi
The journey is undertaken as commercial passenger transportation, i.e. by a taxi with a visible taxi sign on the roof, CBR number, company logo, rate and payment information as well as seat controls and a control unit (taxi meter) installed in the cab.

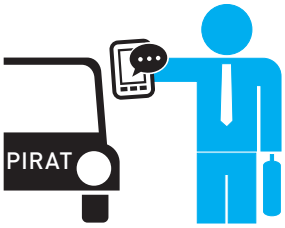
The passenger books the taxi via an app or by telephoning the taxi call center. The journey is registered and assigned to the first available taxi.



Statutory registration, documentation and controls ensure transparent, controllable, uniform and solidary passenger transportation

Pirate taxi
The journey is undertaken by a private pirate taxi, i.e. with no visible sign on the roof, CBR number, rate and payment information or seat controls or control unit in the cab. The passenger books the journey via an app.

Example of cheating: The journey is extended/cancelled



Example of cheating:
- During the journey, the passenger and the driver agree a longer journey that is undertaken with no form of control, i.e. black work

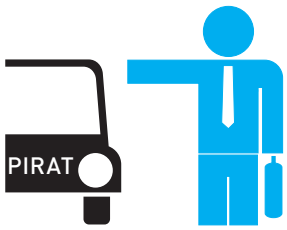
TAXI HAILED ON THE STREET

Authorized taxi
The passenger hails the taxi on the street or at a taxi stance. On entering the taxi, the seat controls and control unit (taxi meter) are activated and the journey is registered with the call center.



Statutory registration, documentation and controls ensure transparent, controllable, uniform and solidary passenger transportation.

Pirate taxi
The passenger approaches the pirate taxi driver (or vice versa). Typically, the pirate taxi hovers/parks in places where there are lots of people, for example, night clubs, stations etc. The pirate taxi driver normally displays a mobile phone with the pirate taxi logo. If necessary, the passenger makes a proforma booking booking to "legalize" the journey.



Example of cheating:
- On entering the taxi, the passenger and the driver agree that the journey will be "fruitless". Consequently, the entire journey will be undertaken without any form of control, i.e. black work

JOURNEYS TO/FROM COPENHAGEN AIRPORT

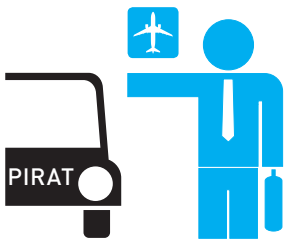
Authorized taxi
In collaboration with authorized taxi firms, Copenhagen Airport has introduced uniform queueing systems for taxis to/from Copenhagen Airport with taxi stances, number plate controls, barriers etc. in order to prevent civil war-like conditions between taxis seeking customers from among travellers.



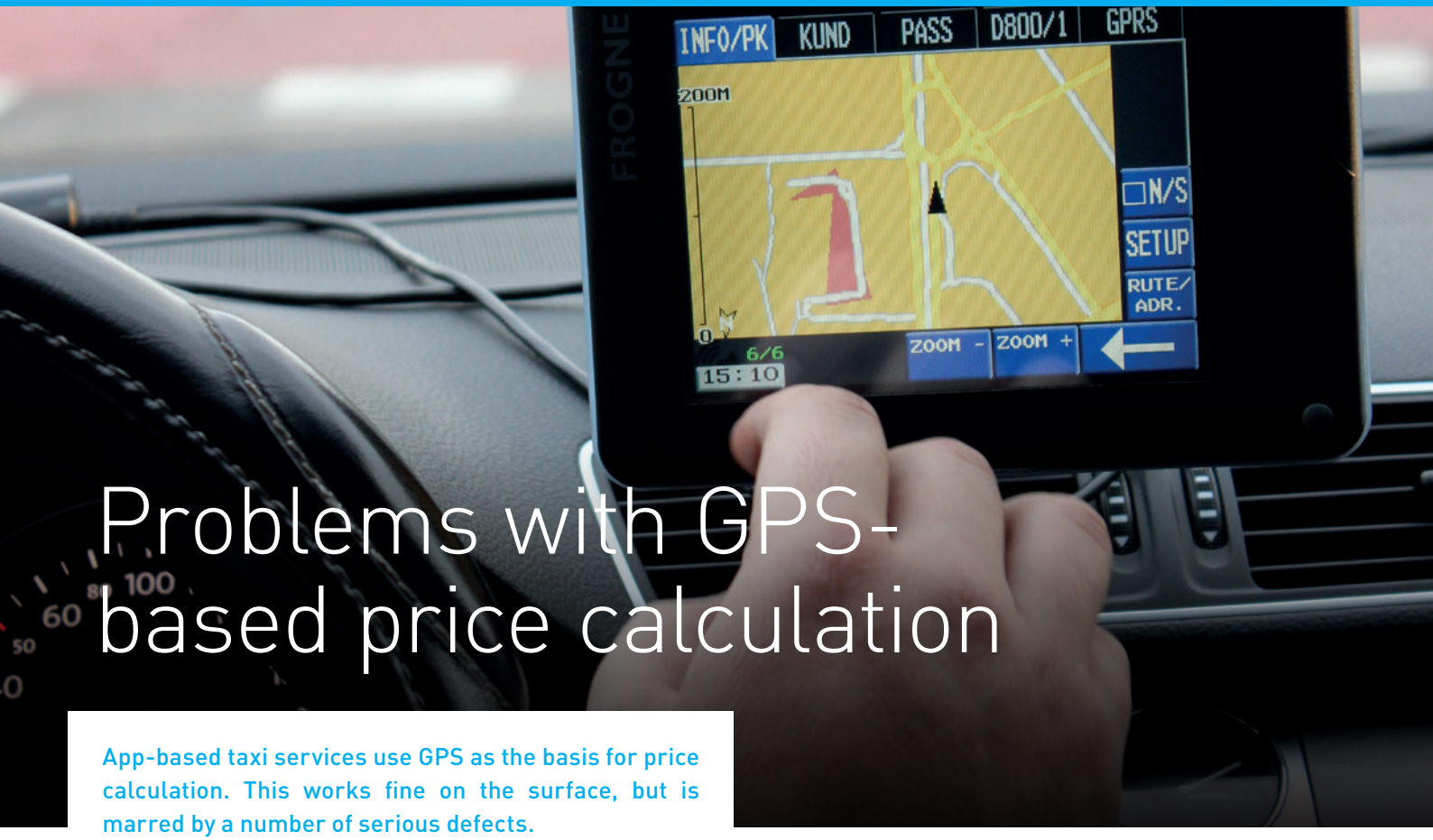
Statutory registration, documentation and controls ensure transparent, controllable, uniform and solidary passenger transportation.

Pirate taxi
Prior to the agreement between taxi call centers and Copenhagen Airport, the residential areas around the airport were plagued by hovering/parked taxis.

The absence of controls and clear, uniform rules for the dropping off and picking up of taxi passengers meant that the whole airport was affected by the law of the jungle that prevailed with regard to taxis.



Today, pirate taxi cab drivers disregard the rules relating to the picking up of passengers and hover around the appointed taxi stances.



Problems with GPS-based price calculation

App-based taxi services use GPS as the basis for price calculation. This works fine on the surface, but is marred by a number of serious defects.

On the other hand, a sealed taxi meter constantly calculates the price based on set rates, time of day, etc. The continuous measuring of the distance is carried out on the basis of the revolutions of the vehicle's wheels, and the price is calculated continuously.

New taxi meters are type approved and manufactured in accordance with international standards, the latest being the EU Measuring Instruments Directive (MID). They comply with requirements for the application environment, clear price display, etc., while manufacture is quality controlled, and they are inspected during installation, given a fixed mount in the vehicle, connected to the driver's identity and have a built-in option to monitor identity and accuracy of measurement.

GPS is used in many contexts (navigation, monitoring, construction, agriculture, sports, games/playing, etc.) and at first glance appears as a secure and thoroughly-tested technology. As the representative for Denmark, we (Finn Frogne A/S) have participated in meetings in Welmec's task force for taxi meters where the use of GPS has been discussed (Welmec is an organization with members from 38 European countries which cooperates to establish a harmonized and consistent common procedure in connection with regulated measurement).

Welmec's taxi meter task force has come to the conclusion that GPS-based taxi meters CANNOT be MID-approved. This is due to a number of serious defects in relation to the wheel-based measuring/price calculation:

1. No traceability There are no international standards, according to which one can make demands on the system and the signals transmitted from satellites launched by the United States and Russia that have complete control of the operation and accuracy of the systems. This violates a fundamental principle of traceability.

2. Does not measure constantly It is known that the system does not work in tunnels and can be blocked by buildings. Nor does it necessarily work immediately after receiving the GPS signal, and therefore distances can be traveled that cannot be recorded.

3. Can be manipulated The possibilities for disturbing the reception or supplying the system with false positions are increasing. Price calculation can easily be influenced systematically without the ability to interfere. Thus, the basis for consumer protection or accounting is note legally present.

4. Outside of police control How the equipment will be able to be identified and checked against a standard such as a police control / annual check or inspection at installation is completely up to the discretion of the provider.

Therefore, if one considers taxis as a legitimate industry – and not an unauthorized friend-based/sharing scheme, then long-standing experience from free taxi markets in Sweden and Hamburg demonstrate commercial, technical, and legally viable solutions that can easily be implemented to Danish conditions.