

Clerk to the Panel on Transport
Legislative Council Secretariat
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

By Email

31 March 2015

Re: Submission to The Legislative Council of The Hong Kong Special Administrative Region Panel on Transport

Dear Madam/Sir,

Please accept the following as our institutional submission to the Panel on Transport in which specific reference is made to operational constraints imposed on our school by the apparent limited availability of student transport services offered by Non-Franchised Public Bus services holding a School Service Endorsement.

A. Context

The Independent Schools Foundation Academy (The ISF Academy) is a through-train, K-12, Private Independent School located on Kong Sin Wan Road in Pokfulam, adjacent to the Cyberport Complex. Now in its 12th year of operations, The ISF Academy has an enrolment of 1,467 students in the 2014-15 Academic Year (August to June) and will commence the next Academic Year with an anticipated enrolment of 1,580. The school is growing towards its enrolment target of 1,800 students, designated as the 'Minimum Number' in the Service Agreement with the Education Bureau (EDB).

While the school is located in close proximity to several large residential developments, such as the Baguio complex and Residence Bel-Air, most students travel to school by means of vehicular transport, either private or public. The school has an existing arrangement with a Non-Franchised Public Bus service (NFB) with a Student Service Endorsement (SSE) that has been in place for at least eight years. Currently, slightly over 50% of all students use the NFB service each day.

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The school's hours of operation are as follows:

- a. School starts each day at 8:00 a.m. (buses typically begin to arrive from 7:15 a.m.);
- b. For Foundation Year students (aged five), lessons conclude at 2:05 p.m.;
- c. For Grades 1 to 12, lessons conclude at 3:25 p.m.; and
- d. For students participating in a school-based co-curricular activity (after school), there are two sessions, the first finishes at 4:30 p.m., the second at 5:30 p.m.

The NFB provider offers a comprehensive service for student 'drop-off' in the morning (all grades) arriving at Cyberport between 7:15-8:00 a.m. In the afternoon, the NFB provider offers a return service for Foundation Year students, (ages ranging from four years nine months to six years old: enrolment of 180) each day at 2:05 p.m. for Grades 1 to 12 students at 3:30 p.m., and a limited service at additional for students participating in school co-curricular activities at 4:30 p.m. and 5:30 p.m.

B. Operational Constraints Arising from NFB Service

As the school depends on the NFB service to deliver 50% of its students to the school at the start of the day and to take these students home in the afternoon, any amendment to the school timetable needs to be approved by the bus company. In most cases, such requests are denied by the bus company, as no/insufficient buses are available to offer a service during the school day.

For a number of years, the school has had to manage increasing traffic congestion in the Cyberport area due to the large number of private vehicles converging on Information Crescent and Kong Sin Wan Road between 7:30-8:00 a.m. each day and at the two major dismissal times (2:00 p.m. and 3:30 p.m.) each afternoon.

In the past year, a proposal, first considered by school management and raised with the Parent and Teacher Association (PTA) to arrange for a staggered start and finish to the day, with secondary school students arriving one hour after primary school students, was rejected by the NFB provider. We were informed that all available buses were deployed to other duties and the staggered start and finish could not be supported by the NFB provider. We are led to understand that this includes meeting the needs of the tourism sector in Hong Kong.

We are able to run a limited service on a small number of half days (Christmas, Chinese New Year, and end of the school year), with students being offered a much truncated choice of drop-off points.

C. Limited NFB Choice for School

When exploring options for alternative service providers we have learned that there are very few choices for large schools. When verbal discussions have been held with our existing service provider, we have learned that only 100 buses (of over 1,000 buses that are operated by the NFB) are allocated for student services. This figure represents roughly about 10% of their revenue.

From the NFB provider's perspective, student bus services tend to be more demanding due to:

- a. The need to provide a bus escort;
- b. Difficulty in hiring qualified bus drivers and escorts; and
- c. Difficulty handling complaints and enquiries from parents, due to their high expectations.

In 2007, the school approached seven bus vendors to quote for the provision of services and only four responded at that time. We awarded the contract to a well-known NFB provider in Hong Kong because it offered the best price for service and had capacity to grow with the increasing numbers of students in the future.

In January 2012, the school approached bus vendors again to quote on providing employee buses, Jackson Coach Hire declined to bid due to existing commitments, and other NFB providers offered similar reasons (see Appendix I).

The overall observation from the school is that there appears to be only a very small number of potential providers in the market offering school services and these providers dictate terms to schools, both in terms of price and scheduling. The number of respondents to any invitation to bid for services has increased with each contract renewal since 2007.

D. Travel Times

One of the issues for parents is the time taken to travel to and from school. For reference, the following offers a summary of scheduled current pick-up and drop-off times for ISF students.

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| Location | Pick-Up | FY Drop-off (5 year olds) | G1-12 Drop-off (6 to 18 year olds) |
|----------------------------------|---------|------------------------------|---------------------------------------|
| Island Resort | 0630 | n/a | 1652 |
| Heng Fa Chuen | 0635 | n/a | 1700 |
| Taikoo Shing HSBC | 0655 | 1440 | 1643 |
| Sham Wan Towers | 0710 | 1420 | 1610 |
| South Bay Road Post Office | 0645 | 1438 | 1635 |
| Belcher's | 0725 | 1425 | 1600 |
| Caine Road, Caritas House | 0658 | n/a | 1615 |
| Old Peak Road #23 | 0700 | 1431 | 1619 |
| Stubbs Road #43 | 0659 | n/a | 1605 |
| La Salle Road, Kowloon | 0630 | n/a | 1630 |
| Clear Water Bay Road, Kowloon | 0648 | n/a | 1700 |
| Nam Cheong Station, Kowloon | 0655 | n/a | 1630 |
| Dynasty Height, Kowloon | 0635 | n/a | 1645 |

Unfortunately, and often for reasons beyond the control of the NFB provider, these scheduled times do not reflect the actual travel times. Please see the case studies below for further information.

E. Case Studies

The following offers several case studies of parents based on feedback covering the actual travel times, costs involved, and the reasons for parent choices. The costs for services this year may be found in Appendix II.

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1. Eastern District – Parent A

Arrival

- a) School Bus pickup at 6:45 a.m. and arrive at 7:20 a.m. (Time: 35 minutes; Cost: \$7000 x 2 semesters / 10 months / average 22 days / 2 trips = \$32)
- b) Mini Bus line up at 6:50 a.m.; depart at 7:00 a.m. and arrive at 7:30 a.m. (Time: 40 minutes; Cost: \$11 for student's one way +\$11x2 for parent's return trip = \$33)
- c) Private Car depart at 7:05 a.m. and arrive at 7:30 a.m. (Time: 25 minutes; Cost: 16kmx\$1/km = \$16)

Dismissal

- d) School Bus depart at 3:40 p.m. and arrive at 5:00 p.m. (Time: 80 minutes; Cost: \$7000 x 2 semesters / 10 months / average 22 days / 2 trips = \$32)
- e) Mini Bus line up at 3:30 p.m.; depart at 3:40 p.m. and depart at 4:15 p.m. (Time: 45 minutes; Cost: \$11 for student's one way +\$11x2 for parent's return trip = \$33)
- f) Private Car depart at 3:30 p.m. and arrive at 4:05 p.m. (Time: 35 minutes; Cost: 16kmx\$1/km = \$16)

2. Kowloon (TST) – Parent B

- a) The family lives in one of the residential buildings on top of MTR's Kowloon Station.
- b) Both parents go to work and so they require a school bus service.
- c) The parents are not completely satisfied with the present service. One reason is that the charges are relatively high. Another reason is that sometimes the parents have found that the buses were not well-maintained (e.g., there have been incidents where buses continued to operate with bald tyres, faulty air conditioners and passengers in excess of capacity).

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- d) Travel time in the morning: 40 minutes (from pick-up point to school). After school: 20 minutes. Total bus fees are HK\$22,000 for the 2014-15 academic year (excluding additional charges for CCA buses). The calculation is that each trip costs around \$50 (\$22,000/10 months/22 days each month/2 trips per day)
- e) The parents temporarily stopped using school bus service because of a safety issue (bald tyre). A complaint was lodged with the NFB provider.

3. Central Mid-levels – Parent C

- a) The father takes the children to school every morning. The bus service is satisfactory, except for the travel time, which is too long. If the parents had a choice, they would definitely NOT use the bus service because:
- The travel time is far too long; it takes one hour to reach home; and
 - Both children are dropped off last on the school bus.
- b) Their child in Foundation Year arrives at home on the school bus at 2:45 p.m. The journey takes about 40 minutes.

Their G1 child arrives home on the school bus at 4:35 p.m. The school bus leaves at around 3:30 p.m. The bus route is very long.

- c) The parents still require school bus service because they have no choice.

4. Central Mid-levels – Parent D

- a) The family stopped using the school bus service because the trips on school bus took too long.
- b) The bus left Dynasty Court at about 6:50 a.m. and arrived at school at about 7:40 a.m. One of the stops on the route was at the Discovery Bay Ferry Pier. The school bus stopped there and waited for the ferry to arrive and for ferry passengers to get on the school bus. A lot of the morning time was spent waiting.
- c) The child's rest was of concern too. The child had to wake up at 6:20 a.m. at the latest and left home at 6:45 a.m. Now that the parents drive their child to school, the child wakes up at 7:05 a.m. and leaves home at 7:30 a.m. There is a difference of 45 minutes.

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- d) The return trip also took about an hour. When the child took the school bus, she usually arrived at home at about 4:30 p.m. She usually dozed off before the bus arrived at her home.
- e) Now that the child goes home in a private car, the trip usually takes about 20 to 25 minutes, i.e. at around 3:50/3:55 p.m. depending on the traffic.

5. Mid-levels – Parent E

- a) The family pays for a one-way service, as the pick-up point in the morning is not very good. The bus company is not flexible and does not cooperate. It takes 15 minutes to drive from home (Babington Road) to school.
- b) It takes at least 40 minutes to arrive at home on the school bus in the afternoon (travelling time - 3:20 p.m. to 4:00 p.m.). This is because the school bus goes to IFC first instead of directly to Mid-levels.
- c) Under the circumstances, the parents can only sign up for bus service for those CCAs that take place at ISF. They refuse to subscribe to any CCA bus service because the drop-off points are not convenient. They feel that they have no bargaining power and the bus company's attitude is take-it-or-leave-it.
- d) The family pays \$7,870 per child (they have two boys with ISF) per year for a one-way bus service (after school). They go on the bus only three times a week. The parents feel that they are paying for their freedom and flexibility.

6. Kowloon (Tai Kok Tsui) – Parent F

- a) The family lives in Olympic, Tai Kok Tsui, Kowloon. They require the school bus service to avoid the problems of driving their two sons to and from school daily.
- b) Pick up and drop offs are usually very punctual. The school bus always arrives within 10 minutes of the specified time.
- c) Drivers have been switched from time to time. Some drivers are young and impatient, and display some tendencies such as reckless driving, including speeding and constant lane switching. These parents complained about the drivers to the NFB provider on two occasions. The

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students have also complained that the bus was dirty with cockroaches found in the bus seats.

- d) The students are picked up at 7:05 a.m. in the morning, and dropped off at 4:15 p.m. in the afternoon. They find the traveling to and from school reasonable.
- e) Bus service for 2014/15 academic year is \$26,850 for the whole year. With two boys studying at ISF, the parents have to spend \$5,370 per month for two boys to commute to and from school. They find the service very expensive.

7. Other areas

- a) Repulse Bay – Parent G: The family lives in Repulse Bay and has two children with ISF. They used the school bus service in the past but stopped due to excessive travel times.

Summary of Case Studies

ISF parents have reported the following issues:

- a) Unreasonably long travelling times;
- b) Service being run like a monopoly, parents feel that they have no bargaining power;
- c) Inflexible conditions of service;
- d) Bus fees generally regarded as expensive; and
- e) School buses not kept in good condition.

F. Summary

For many schools in Hong Kong, traffic congestion at the commencement and conclusion of each school day is a serious community issue. The high prevalence of private car usage exacerbates this problem, but for some schools, such as The ISF Academy, the absence of suitable public transport links with reasonable travel times and appropriate supervision into Cyberport means that parents are left with the choice of either using an NFB service, with its attendant delays and costs, or using private transportation.

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The number of parents using private vehicles has now become a serious issue for the school. This fact is reflected in the most recent Service Agreement with the Hong Kong Government that requires the school to operate the school under a number of conditions, one of which is the following:

(19). The SSB shall impose proper traffic management measures to ensure the traffic in the nearby area would not be disrupted. The SSB shall explain to and resolve with parents and local residents on the traffic issues and to make any adjustment if necessary to the satisfaction of the relevant authorities.

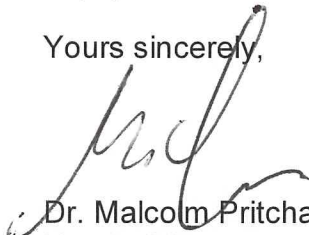
The school (and its School Sponsoring Body or SSB), clearly has very few options at its disposal to 'impose' any form of traffic management on public roads in order to reduce or eliminate traffic disruption in the nearby area. The resolution of traffic issues lies beyond the legal powers conferred on the school, as the issues are occurring on public roads that school parents, along with local neighbours, have the right to use.

The encouragement of parents to utilise NFB services would certainly help reduce the number of private vehicles using the streets adjacent to the school between 7:30-8:00 a.m. and 3:20-3:50 p.m. each day. The capacity to stagger starting and finishing times would also assist in this regard, allowing the school to spread out the traffic peaks across a longer period each morning and afternoon. The provision of more competitive and responsive NFB services would similarly lead to a higher parent uptake of services.

The school therefore respectfully requests that the Panel consider the current challenges for schools in the provision of NFB services, challenges largely imposed by the relatively small pool of service providers with sufficient expertise and operational scale to offer schools such as The ISF Academy with a viable service.

Please do not hesitate to contact the school should this submission give rise to any questions of fact or interpretation.

Yours sincerely,


Dr. Malcolm Pritchard
Head of School

Appendix I

13/01 2012 FRI 17:51 FAX

001/001



Your Ref.:

12 Jan 2012

The Independent Schools Foundation Academy
1 Hong Sin Wan Road, Pokfulam, Hong Kong

By Fax: 2235 4485

Attn: Mr. Victor So

Dear Mr. So,

RE : Declining to Quote - Provision of Shuttle Bus Service for Staff

We would like to thank you for your invitation to quote for the Shuttle Bus Service.

After our considering, we regret to inform you that we are unable to offer owing to our resources are inadequate to serve in coming semester 2012.

We thank you again for the invitation. We look forward to opportunities in serving you in the future.

Please contact the undersigned on 2513-8889 if you have any further queries.

Yours sincerely
For and on behalf of
Jackson Coach Hire Service Ltd.



Alan Wong
Sales Manager

Appendix II

| The Independent Schools Foundation Academy | | |
|--|---|-------------------------|
| 22 Buses in Use | | |
| Route | Pick Up | 2014-15 (whole year) |
| 1 | Island Resort, Hang Fa Chuen | \$12,850 |
| | Pacific Palisades, Braemar Hill | \$11,800 |
| 1A | Taikoo Shing, Kornhill Garden | \$12,850 |
| 1B | Broadwood Rd, Broom Road, Happy Valley | \$11,800 |
| 2 | Tai Hang, Jardine's Lookout | \$11,800 |
| 3 | HK Parkview | \$13,400 |
| | Larvotto, South Horizon | \$9,900 |
| | Bel-Air Phase 4 and 1 | \$7,500 |
| 3A | Chi Fu Fa Yuan, Pokfulam Gardens | \$9,300 |
| 4 | South Bay Road, Repulse Bay | \$13,400 |
| 4A | South Wave Court, Marinella | \$9,900 |
| 4B | Tai Tam Road, Stanley Mound Road, Headland Road | \$13,400 |
| | Shouson Hill Road | \$9,900 |
| 5 | Conduit Road #odd nos. | \$11,800 |
| 5A / 5B | The Belcher's | \$9,300 |
| 5C | Po Shan Road | \$11,800 |
| | Pokfield Rd, Mt Davis Rd | \$9,300 |
| 6 | Macdonnell Rd, Kennedy Rd, Robinson Rd | \$11,800 |
| 6A | Hollywood Terrace, Caine Rd, Bonham Rd | \$11,800 |
| | Pokfulam Road #84 | \$9,300 |
| 7 | Magazine Gap Rd, Tregunter, Old Peak Rd, IFC | \$11,800 |
| | Victoria Road | \$9,300 |
| 7A | Mt. Austin Road, Peak | \$13,400 |
| | Upper Stubbs Road | \$11,800 |
| 8 | Bowen Mansion, Kennedy Rd, Shiu Fai Terrace | \$11,800 |
| 9 | Scenic Villa, Bisney Rd, Upper Baguio | \$9,300 |
| 10 | One Beacon Hill, Laguna Verde | \$22,850 |
| | Homantin Hill Rd, Parc Palais, King's Park Villa | \$24,850 |
| 11 | Clearwater Bay Road, Grand Waterfront | \$22,850 |
| | Tin Kwong Road | \$24,850 |
| | Silver Terrace Rd, Fei Ngo Shan | \$25,450 |
| 12 | The Sparkle, Nam Cheong, Sorrento, Waterfront, Gateway (via West Tunnel both ways) | \$26,850 |
| 13 | Yau Yat Chuen, Dynasty Height | \$24,850 |
| | One Silversea, Park Avenue, Cox Road, Austin Station (via West Tunnel both ways) | \$26,850 |