

**For discussion  
on 17 April 2015**

## **Legislative Council Panel on Transport**

### **Public Transport Strategy Study – Provision of Student Service Vehicles**

#### **PURPOSE**

Eight topical issues will be covered by the Topical Study under the Public Transport Strategy Study (“PTSS”). The Topical Study on the supply and demand of student service vehicles (“SSVs”) (commonly known as “school buses”) and whether the existing arrangement concerning the issue of student service endorsement to non-franchised buses (“NFBs”) can meet demand has been completed. This paper briefs Members on the outcome and consults Members on the new arrangements with respect to school bus service arrangement for the new school year commencing September 2015.

#### **BACKGROUND**

2. In tandem with the further development of the heavy rail network, we consider it necessary to examine the overall strategic arrangements of the public transport system so as to enhance the complementarity amongst the various public transport services. This is to ensure that the public can enjoy efficient services with reasonable modal choices on the one hand, and public transport operators can enjoy sustainability on the other hand. To this end, the Government would commence the PTSS. As explained in our work plan presented to the Legislative Council (“LegCo”) Panel on Transport in November 2014, the PTSS comprises two parts, namely the Role and Positioning Review (“RPR”) and the Topical Study. The RPR will review the roles and positioning of various public transport services, while the Topical Study will look into important topics that are of concern to LegCo members, the public and the public transport trades. The workflow of the two parts is repeated at **Annex 1**.

3. As regards NFBs, they play a supplementary role in the public transport system through relieving the demand for franchised bus and public light bus services during peak hours, and providing tailor-made services for specific groups (such as students and tourists). NFBs provide service in accordance with the Public Bus Services Ordinance (Cap. 230) and Road Traffic Ordinance (Cap. 374). The law requires an operator to obtain from the Commissioner for Transport (“the Commissioner”) a passenger service licence before he/she can

provide passenger service. Furthermore, an operator is required to provide documental proof (such as service contracts) to the Commissioner for the actual service(s) that he/she is to provide before he/she will be granted the appropriate service endorsement(s). NFBs can only provide service according to the following endorsements –

Type of Service	Code <sup>1</sup>
Tour Service	A01
Hotel Service	A02
Student Service	A03
Employees' Service	A04
International Passenger Service	A05
Residents' Service	A06
Contract Hire Service	A08

An NFB may be granted a single endorsement or multiple endorsements<sup>2</sup>. In other words, an NFB can provide a single or multiple types of services so that the fleet can be put to more efficient use. As at end-2014, there were over 7 000 NFBs in the market with service endorsements. Details are at **Annex 2**. As NFB services are basically arranged directly between the users and the operators, their services can flexibly meet market needs and their fares need not be approved by the Transport Department (“TD”).

4. NFB service has generally been operating well. Yet, there has been some public concern over the supply of SSVs in recent years. Some schools have also reflected that they encountered difficulties in arranging tender for school bus service or that the bid prices were high. To increase the supply of school buses, the TD has since 2012 implemented a new measure to allow an NFB operator in possession of student service endorsement to use all vehicles meeting the relevant requirements in his/her fleet for carriage of students upon application. Over 400 additional vehicles have since been granted student service endorsement through this measure. Despite having this measure in place, the number of NFBs with student service endorsement still decreased between 2012 and 2014. We are also given to understand that some schools are facing difficulties in tendering their

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<sup>1</sup> There is another service endorsement coded “A07” for multiple transport service. The Transport Department has not issued this type of endorsement for years due to market changes.

<sup>2</sup> Generally, an NFB may hold 3 – 4 endorsements at a time.

school bus service. According to the survey conducted by the TD in 2014, about 70% of NFBs with student service endorsement (around 2,400 NFBs) were actually providing student service. About 98% of these NFBs were also in possession of other service endorsements. This suggests that some NFBs that can provide student service are in fact not providing such service. In other words, some NFBs with student-cum-other service endorsements have opted to provide services other than student service because of market force. At the same time, there were 59 NFBs with student service endorsement only at end-2014.

5. Against the above, we have looked into the supply of vehicles that can provide student service under the Topical Study. As regards the other types of NFBs, their supply and demand has remained broadly steady<sup>3</sup>. Nonetheless, having regard to the commissioning of new transport infrastructures in the pipeline and further socio-economic development, we will review under the RPR whether there is a need to allow certain flexibility on NFB operation as appropriate to meet new service demand. We will consult the trade in the process.

#### **(a) Regulation of NFBs**

6. Before 2003, there was a rapid increase in the number of NFBs. The growth of passengers in the same period was, however, relatively slower<sup>4</sup>. Owing to limited road space, the public and the transport trade showed concern over the over-supply of NFBs, and the operating of unauthorised services by some operators. In this regard, the Transport Advisory Committee (“TAC”) carried out a review on the regulatory framework and the licensing regime for NFB service. The TAC suggested in July 2004 that while there was no need to set a ceiling on the total number of the NFB fleet, the Government should tighten the licensing regime and vetting procedure, so that NFB service could be adjusted taking into account the change in demand. The TAC also suggested that the Government should strengthen enforcement action to maintain the delicate balance of various public road transport services. Since 2005, the Government has implemented the measures recommended by the TAC with a view to controlling the increase in NFBs. One of the measures implemented is to encourage applicants for new NFB service or fleet expansion to source vehicles from existing fleet in the market (“sourcing requirement”). The objective is to have some control over the overall number of NFBs in the market. Under the sourcing requirement, an applicant would be given a period (usually six months) to try sourcing vehicles from the existing fleet in the market. The sourcing requirement is applicable to NFBs providing student service.

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<sup>3</sup> The number of NFBs remained at around 7,000 between 2011 and 2014. According to the survey conducted by the TD last year, the utilisation rate of the fleet reached about 90%.

<sup>4</sup> Between 1998 and 2003, the number of NFBs increased considerably by about 23%, from about 5,900 to about 7,200. The number of public transport passengers only rose by 2.3% over the same period.

**(b) Supply of SSVs**

7. Apart from NFBs with student service endorsement, vehicles that can carry students include school private light buses (commonly known as “nanny vans”) and private school buses owned and operated by schools or school sponsoring bodies direct. Details are as follows –

<b>Vehicles that can provide student service</b>	<b>NFBs with “student service” endorsement</b>	<b>Private school buses</b>	<b>“Nanny vans”</b>
Type of vehicle	NFB	NFB	private light bus
Mode of operation	<ul style="list-style-type: none"> <li>• Run by NFB operators. Operators can apply for student service endorsement from the TD with contracts signed with school(s) or supporting letter(s) signed by school(s)</li> <li>• Operators can provide service in different districts or for different schools</li> <li>• Mainly serve primary school students</li> </ul>	<ul style="list-style-type: none"> <li>• Schools or school sponsoring bodies can apply for student service endorsement from the TD, for buses owned and operated by themselves</li> <li>• Mainly serve primary school students</li> </ul>	<ul style="list-style-type: none"> <li>• Run by operators of “nanny vans”. Operators can apply for passenger service licence from the TD with contract(s) signed with school(s) or supporting letter(s) signed by school(s)</li> <li>• Operators can provide service in different districts or for different schools</li> <li>• Mainly serve primary school and kindergarten students</li> </ul>
Permitted uses	Have to obtain student service endorsement, but can also apply for other endorsements as mentioned in paragraph 3 above to provide other	Can only be used for carrying students of the designated school or school sponsoring body, and not for any other purposes	Can only be used for carrying students of the school(s) as approved under the passenger service licence, and not for any other purposes. If there is any change with the

Vehicles that can provide student service	NFBs with “student service” endorsement	Private school buses	“Nanny vans”
	types of services		school(s) being served, the operator needs to apply to the TD for the change
Whether the sourcing requirement applies	Yes	Yes	No
Number of seats	Over 16 seats; 30 seats on average	Over 16 seats; 30 seats on average	16 seats or less
Number of vehicles as at end-December 2014	3,286	74	1,899

8. The supply of SSVs mainly depends on free market operation. It is up to the schools to make arrangements for student transport services in accordance with the needs of the students and parents. The number of the above three types of vehicles between 2011 and 2014 is at **Annex 3**. Although there is some change in the number by individual vehicle types, the overall carrying capacity of student service has remained more or less the same.

**(c) Demand for student service**

9. Annual student figures at the beginning of the new school year show that the total student population has decreased by around 2,500 during the four school years from 2011/12 to 2014/15 (see **Annex 4**). Notwithstanding, between the 2013/14 school year and 2014/15 one, the number of kindergarten and primary students has recorded a notable increase by a total of around 15,000. Although the total student population has shown little variation, the proportion of kindergarten and primary students has increased. There would remain a certain demand for school bus service in future.

## **New Measures**

### **(a) The TD's proposal for consultation**

10. In view of the community's concern over SSV supply during the past few years (particularly the demand from schools and parents), the supply and demand situation despite the implementation of the new measure in 2012 (see paragraph 4 above), and the number of kindergarten and primary students in the coming few years, the TD has considered whether the flexibility of SSV supply should be suitably increased, with a view to better catering for market demand. In this connection, the TD is of the view that the sourcing requirement can be suitably relaxed, and has prepared a relaxation proposal for the purpose of trade consultation. Details are at **Annex 5**.

### **(b) Proposals from the transport trade**

11. On 27 March 2015, the Transport and Housing Bureau, Education Bureau and the TD had a meeting with a number of LegCo Members, as well as representatives of transport trade organisations and groups of the education sector to exchange views on the TD's proposal. The transport trade had no difficulty with TD's proposed exemption of private school buses from the sourcing requirement. However, they had concerns over the TD's proposal of granting new endorsement for "solely for student service" (with a code of A03R) to NFBs. The transport trade has provided some operational data on using NFBs to provide school bus service, attached at **Annex 6**. The trade has put forth an alternative proposal in the form of an undertaking (at **Annex 7**). Subsequently, some members of the trade have also proposed other measures through a press release (see **Annex 8**).

### **(c) Measures for the new school year commencing September 2015**

12. The TD will implement the measure of exempting private school buses from the sourcing requirement as soon as possible. As for school bus service provided by NFBs, following the in-depth discussion at the meeting on 27 March, representatives of the transport trade and the education sector will set up a working group to actively explore how the arrangements with respect to the supply and demand of school bus service can be improved for the new school year in September 2015. The Government welcomes the formation of the working group, and will encourage it to kick-start its discussion with the two proposals under paragraph 11 above as the basis. The Government will closely monitor the supply and demand of school bus service after the working group comes into operation, and will collect comments from the transport trade and the education sector regarding the effectiveness of the work of the working group in improving the arrangements with respect to the supply and demand of school bus service.

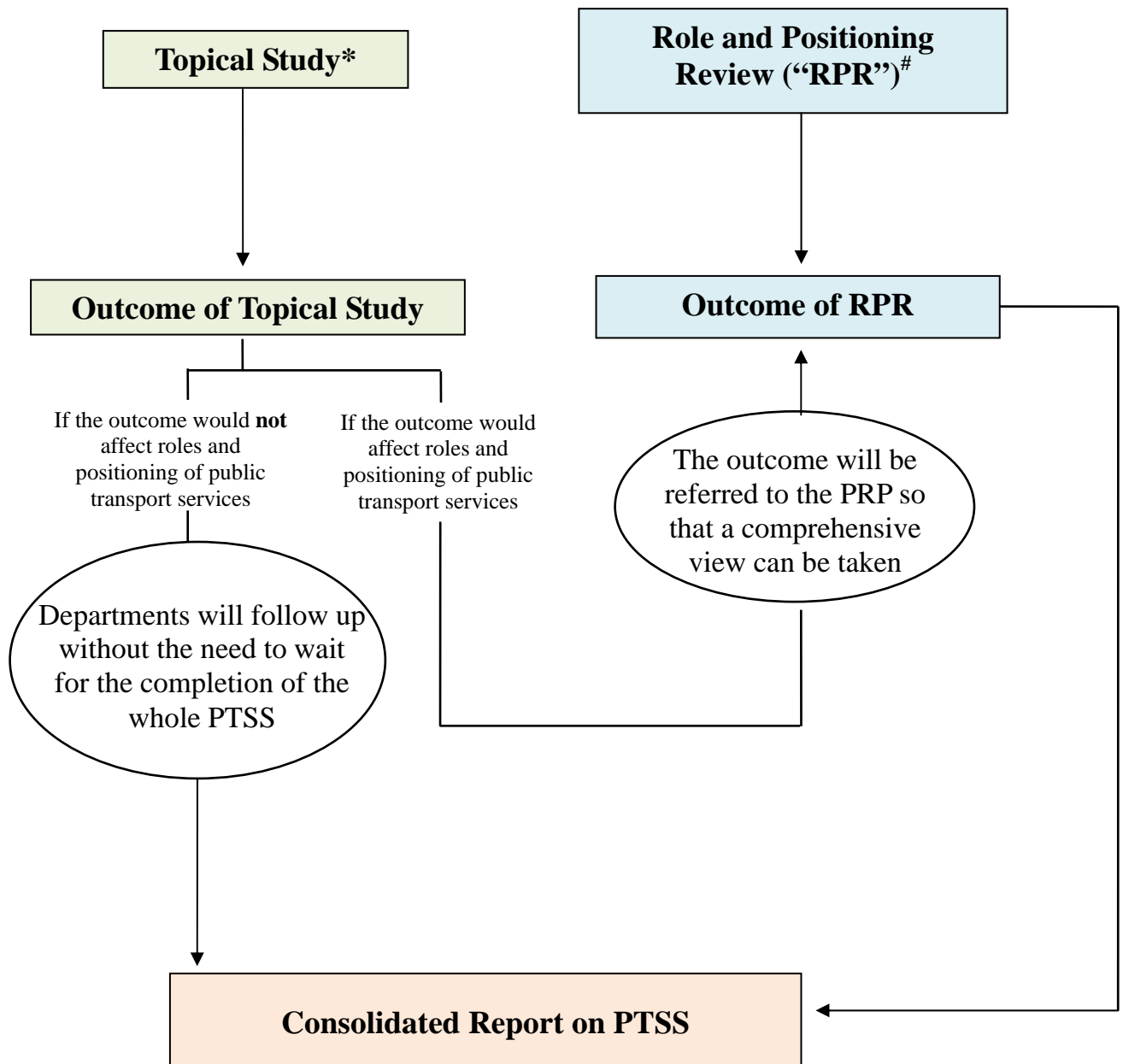
The TD will see how the situation unfolds and decide whether, and if so when, the proposal under paragraph 10 above should be implemented as appropriate.

**Advice Sought**

13. Members are invited to comment on the proposals as set out in paragraphs 10-12 above. In addition, as pointed out in paragraph 5 above, under the RPR of the PTSS, we will review whether there is a need to allow certain flexibility on NFB operation as appropriate to meet new service demand, having regard to the commissioning of new transport infrastructures in the pipeline and further socio-economic development.

**Transport and Housing Bureau  
April 2015**

**Work flow of the  
Public Transport Strategy Study (“PTSS”)**



\* We will report the outcome of individual issues covered by the Topical Study starting from the first quarter of 2015.

# The RPR will be commenced after the LegCo has approved in due course the resources and manpower required under the established procedures.



**Number of service endorsements of non-franchised buses (“NFBs”) since 2011**

<b>Year (as at end-December)</b>	<b>Number of various service endorsements</b>							<b>Total number of registered NFBs</b>
	<b>Tour service</b>	<b>Hotel service</b>	<b>Student Service</b>	<b>Employees’ Service</b>	<b>International Passenger Service</b>	<b>Residents’ service</b>	<b>Contract Hire</b>	
2011	2,925	2,188	3,577	1,855	1,128	1,132	5,479	7,071
2012	2,918	2,015	3,489	1,752	1,163	1,135	5,438	7,055
2013	3,108	1,937	3,468	1,704	1,169	1,108	5,463	7,054
2014	3,155	1,865	3,286	1,751	1,169	1,117	5,514	7,053

Note: An NFB can be granted with more than one service endorsement, thus the total number of service endorsements does not equal to the total number of NFBs.

**Annex 3**

**Number of vehicles that can provide student service since 2011  
(as at end-December)**

	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>Change between 2011 and 2014</b>
Non-franchised buses with student service endorsement	3,577	3,489	3,468	3,286	-291 (-8.1%)
School private buses	60	64	67	74	+14 (+23.3%)
School private light buses (known as “nanny vans”)	1,259	1,480	1,740	1,899	+640 (+50.8%)
<b>Total number</b>	<b>4,896</b>	<b>5,033</b>	<b>5,275</b>	<b>5,259</b>	<b>+363 (+7.4%)</b>

**Annex 4****Number of students for each school year since 2011/12  
(as at end-September of each school year)**

	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/15</b>	<b>Change between 2011 and 2014</b>
Kindergartens	157,433	164,764	169,843	176,397	+18,964 (+12.0%)
Primary schools	322,881	317,442	320,918	329,300	+6,419 (+2.0%)
Secondary schools (Secondary 1 to 3)	208,010	197,667	187,631	180,153	-27,857 (-13.4%)
<b>Total number</b>	<b>688,324</b>	<b>679,873</b>	<b>678,392</b>	<b>685,850</b>	<b>-2,474 (-0.4%)</b>

## **Transport Department (“TD”)’s Proposals**

### **Measure 1:**

- Private school buses will be exempted from the sourcing requirement, meaning that schools or school sponsoring bodies will not be required to source second-hand vehicles in the market and can procure new vehicles as needed.

### **Measure 2:**

- Non-franchised buses (“NFBs”) solely used for student service will be exempted from the sourcing requirement, meaning that operators will not be required to source second-hand vehicles in the market and can procure new vehicles as needed. These NFBs will be issued with endorsement for “solely for student service”. The service endorsement code will be “A03R” so as to distinguish it from the ordinary service endorsement for “student service” (with a code of “A03”).
- In order to ensure the endorsement for “solely for student service” (A03R) will not be abused, NFBs granted with such an endorsement have to comply with more stringent requirements. These include –
  - (a) the applicant must submit to the TD a school bus contract signed with a school for a period not less than a full school year or 12 months. The contract shall be signed by the school principal or the school representative responsible for school bus service on behalf of the principal. Sub-contracts will not be accepted;
  - (b) NFBs concerned can only provide service for the school as specified in the signed service contract. If there is any change with respect to the school for which service is provided, the operator must immediately submit an application along with a new service contract to the TD, and can only provide service for the new school upon receiving written approval from the TD;

- (c) NFBs concerned will only be allowed to provide student service, and cannot be used for other services. The operator is required to affix signs of a particular size, printed in a particular colour and with a particular font, on the bus body to facilitate TD's supervision; and
- (d) if such NFBs are no longer used to provide student service, they can be resold to others as replacement for current NFBs with passenger service licence. The original passenger service licence and service endorsement granted by the TD for such NFBs will be cancelled at the time of resale.

**Monthly basic operating costs of non-franchised buses  
providing student service  
(Information provided by the Public Omnibus Operators Association)**

<b>Item</b>	<b>Amount</b>
Driver's salary	\$16,000
Depreciation	\$15,000
Fuel	\$6,500
Repair and maintenance	\$7,000
Nanny's salary	\$4,500
Parking	\$4,000
Licence fee and insurance	\$3,000
<b>Total</b>	<b>\$56,000</b>

- Remarks: (1) The amount of depreciation is calculated based on a 60-seater NFB at an average cost of around \$1.6 million and with a 10-year depreciation period.
- (2) If a bus owner purchases a new bus on mortgage, the amount of monthly repayment is about \$28,000 based on a 5-year repayment period.

**Monthly basic operating costs for “nanny vans”  
(Information provided by the Motor Transport Workers General Union  
Non-franchised Bus Branch School Children Vehicle Section)**

<b>Item</b>	<b>Amount</b>
Driver’s salary	\$10,000
Depreciation	\$3,300
Fuel	\$6,000
Repair and maintenance	\$3,000
Nanny’s salary	\$5,000
Parking	\$3,000
Licence fee and insurance	\$3,000
<b>Total</b>	<b>\$33,300</b>

- Remarks: (1) The amount of depreciation is calculated based on a 16-seater school private light bus at an average cost of around \$600,000 and with a 15-year depreciation period.
- (2) If a school private light bus owner purchases a new light bus on mortgage, the amount of monthly repayment is about \$11,000 based on a 5-year repayment period.

(Only Chinese version is available)

## 承 諾 書

為保證 2015/16 學年學童校巴服務招標工作順利進行，公共巴士同業聯會（下稱：“本會”）針對運輸署及香港教育工作者聯會（下稱“教聯會”）提出有關 2014/15 學年學童校巴服務“招標難”的問題，本會摯誠地做出以下承諾，協助學校解決招標問題，補助校車公司部分虧損，同業互助。

本會確信市場上有足夠運力，只是報價模式引致風險及經營車資入不敷支問題。

面對 2015/16 學年，部分學校招標校巴服務無人問津的問題，懇請相關學校先向運輸署及教聯會同時登記，以便統計，再經運輸署或教聯會通知本會，本會當即協助校方進行第二輪招標，並採取以下措施，提高招標成功率：

- (1) 將招標檔廣發給所有公共巴士及 16 座保姆車同業，確保所有營辦商獲發招標通知，避免校方聯絡不在當區。  
經營的校巴公司，加強學校所在地區及車公司營運區域配對，提高招標成功的機會。
- (2) 幫助校方擬定合理招標路線及上車時間等招標條款，減低因校方不熟路線而令校巴公司虧損經營的機會。
- (3) 制定區域學童校巴服務協作方案。  
針對個別學校招生不足問題，而引起跨區上學及長距離學童分散問題，單一校巴公司根本無法經營，本會將連同 16 座保姆車（學童車協會）聯繫屬下當區的校巴公司聯合提供服務，提供多公司協作方案，以解決承載率不足所引起車資大幅上升的問題。
- (4) 本會直接補助虧損投標的校車公司。  
若以上問題仍未解決，在校方合理服務要求下，經本會衡量校巴公司確實“收不抵支”情況下，本會將在 2015/16 學年內有限度補貼校巴公司的虧損，或提供更多的業務機會，幫補有關校巴公司收益不夠的問題，條件是該學校校巴服務整體是虧損經營（不是單一線路），經本會核實成本、營運數據，本會樂意補貼部分虧損，上限為該校校巴服務整體估算虧損的 30%，作為針對性補貼人口老化地區及偏遠地區校車車資，以為日後政府考慮推行“校車券”，提供有力的參考數據。

本會當竭股肱之力，冒著虧損上百萬的風險提出上述莊嚴承諾，雖不是長治久安之策，但以盡最大的誠意，力諫運輸署提出增發 A03R 客運營運證，不但弄巧反拙，好心做壞事，減低了車公司營運彈性，提高了校巴經營者的固定成本，導致學童校巴車資飛升，令校巴招標更難，而且還因政策失誤而引致大幅減少 A03 學童批註的巴士供應。本會財力有限，但為爭取更多時間給運輸署調研利弊及政策局擬出“長治久安”之策，只能短時期（2015/16 學年）有限度（虧損的 30%）補貼 投標後持續虧損經營的校巴公司，不竟業界不能長期虧損經營，以成就學校及學童，此不是持續發展之計。

以上承諾，言出必行，崙此奉達，佇候鴻裁。

公共巴士同業聯會



*黃良柏*

第十六屆執行委員  
主席 黃良柏 謹啓

二零一五年三月二十七日



## 新聞稿

### 要求運輸署按原有機制諮詢各交通業界 暫緩執行新批 A03R 巴士牌照

就 2015 年 3 月 4 日運輸署突然向各非專營巴士業界發出有關修訂“經營公共巴士服務的條件”之政策檔（共 6 頁文檔），完全顛覆了 2004 年 7 月立法會交通事務委員會有關“檢討規管非專營巴士營運的規管架構和發牌制度”，本會認為立法會交通事務委員會於 2014 年 11 月 25 日會議上，曾討論<公共交通策略研究>工作計劃，正收集及徵詢各界意見，而該研究工作計劃的課題已包括非專營巴士的校巴服務。運輸署根本沒有實際及急切的必要，而越過立法會及交諮會，由一個執行單位推翻政策制定機關，倉促向業界推出修訂校巴服務的建議。

本會認為運輸署此舉既不合理，也不公平，原因如下：

#### 1. 繞過現行諮詢架構

現行規管非專營巴士營運的規管架構和發牌制度是按照 2004 年 7 月特區交通諮詢委員會的“檢討規管非專營巴士營運工作小組報告”及經立法會交通事務委員會公告天下，召開聽證會，經 93 個交通團體代表發表意見，然後才通過。為何運輸署作為一個執行機關，只發出 6 頁紙(附件)，沒有數據資料及前因後果說明，就可繞過現行諮詢架構，推翻各個交通業界凝聚共識的結果及立法會的決定。

無疑，任何政策也應因時修訂，但修訂也須按照多年來行之有效的諮詢方式，將行政機關權力放在籠裡，具透明度地、負責任地受公眾監管。

#### 2. 新政策只得十四天書面諮詢期

政策影響深遠，可能短期會增加 2,000 輛以上大巴(增加 28%巴士)，牽涉到道路交通擠塞，巴士維修場地及停車位不足，市場嚴重欠缺司機等配套設施，只給十四天諮詢期，及只能給書面通知，實不合理。

#### 3. 所有交通業界都反對，仍堅持強行執行

所有交通業界包括的士、小巴、非專營巴士、專營巴士、16 座學童車

協會均表示反對，運輸署仍力排眾議，堅決強行執行，既然無一個業界得益及支持，為何要冒天下之大不韙，令人聯想背後有巨大利益集團推動。

4. 無序無上限暴增供應，牽動小微校巴公司倒閉潮

無序無上限的暴增供應，只會偏幫大公司，對“一車一主”的單幹戶或只擁有數輛車的小型校巴／保姆車公司，根本承受不了無業務支持的暴增供應振盪，牽動校巴單幹戶及小微企的倒閉潮，製造校巴行業的寡頭壟斷，為日後飛升的校巴車資塑造條件。對“一車一主”的單幹戶及保姆車公司，抗爭，只為生存而戰。

5. 校巴供應，應按實際需求，有序地逐步增加

無序無上限的供應，根本不是政策，美國聯儲局加息都不敢無序無上限，一蹴而就，加上三數厘，深怕經濟、市場承受不了，為何運輸署心思就不能細密？眾所周知，校巴需求年年下跌：香港出生率世界最低、學校教育模式由上下午班轉為全日制、教育署推行“原區就學”令校巴車資下跌、校車“一返三放”，分三段時間放學、小班教學、人口老化地區／偏遠地區招生難，均令校巴服務需求年年委縮，加上過去數年，學童保姆車／A03 批註大巴座數沒有減少，在需求委縮，供應不變下，校巴經營者收入自然下跌，何以，運輸署逆其道而行，反提出無上限暴增校巴供應，置校巴經營者苦撐於不顧，如何以理服人？

6. 打著“自由市場”，反“自由市場”

校巴“零”投標，是因為校巴按自由市場規律經營；學校收生不足，而導致學童遍佈全港，每車 10 數個學生，收不抵支，自然不投標。然而，運輸署卻簡單認為大量增發校巴牌照，必定可減低車資。殊不知“自由市場”是需要大量不同規模的經營者加入，才可營造“價格競爭”，短時無序大量增加供應，汰弱留強的，只是淘汰經濟實力低的小公司，而不是經營能力差的大公司。最後，剩下來的只會是 10 數間大公司形成的寡頭壟斷校巴市場。莫非寡頭壟斷的，自由議價的，就是“自由市場”，待壟斷形成後，校巴車資必定無休止的大幅上升。

7. 不同尺度看待“教育服務”及“校巴服務”

“校巴服務”是按自由市場規律經營，學校生源不足，學生分散，必招

致收不抵支而停辦，然而“教育服務”是社會服務 (Social goods)，即使學校短期招生不足，大部份官校、津貼學校仍獲教育署財政資助，根本不用憂心因短期招生不足而停辦。

近年，校方因招生不足，而要求教育署停建新校，減低新校搶學生的情況，同一個學童不足問題，應該減少校巴供應，何以校方卻不斷施壓以大幅增加校巴供應？

說到尾都是校方為求增加招生的吸引力，以提供校巴服務配套，把校巴公司辦不來的責任推給業界。

**本會認為上述發牌政策倉促執行，會出現以下兩點深遠影響：**

1) 將權力放在籠裡

免費發出學童巴士牌照，牽涉莫大利益，須按現有機制經特區交通諮詢委員會、立法會交通事務委員會諮詢業界意見，再形成政策檔，不能閉門造車，以快打慢，草草推行。

2) 政策弄巧反拙，好心做壞事，未能對症下藥

政策的目的是“解決校巴招標難問題”及“緩解車資提升壓力”，但新牌照只許經營校巴，365 天成本分攤 200 天上課日收取，校巴營辦商固定成本大升 82.5% 以上，最後只有轉嫁給家長，逆其道而行，好心做壞事。

**綜上所述，本會誠盼運輸署可考慮我會以下幾點要求：**

1) 諮詢方面

a. 要求運輸署延長諮詢期，任何重大政策改變應按現有行之有效機制，將理據交予特區交通諮詢委員會及立法會交通事務委員會，廣泛諮詢業界，凝聚共識，始能通過。

b. 發牌政策沒有實質及急切需要，只給予十四天諮詢期，以便草草通過。發牌政策存在莫大利益，恐防私相授受，貪腐之嫌，遭人口實，以傷特區廉潔之名。

2) 短期建議

- a. 建議學校以包車或包班的方式招標校巴服務。

校巴公司不投標校巴服務，主要是擔心收生不足的風險，若校方以每轉計算投標價，免校巴公司面對計價風險，自然吸引更多車公司報價投標校巴服務；再者此方式易於執行，亦無須政府改變現行的政策。

- b. 建議學校實施彈性上、下課時間。

建議教育署調整幼稚園、小學及中學上學時間，令校巴公司早上可多做一轉車，提高車輛使用率，間接減低車資升幅。

3) 長遠建議

- a. 政府向所有學生提供校巴補貼“學生車券”。

由政府向所有學生（非只為跨區清貧的學生）提供校巴津貼，如學童車券，與現行的車船津貼類同，以減輕學生的交通費負擔。

- b. 政府向個別人口老化地區／偏遠且交通不便地區的學校，提供給學生“特殊地區”交通補貼，以針對性補助上述校車乘坐學童不足地區的部份車資，緩解車資調整壓力。

屯門區旅運巴士同業聯會 啟