23 September 2008

SEE ATTACHED LIST

Dear PERSON

Re: Anonymous Use of Public Roads and Public Transport

There has been a substantial shift in recent years towards tolling of roads, bridges and tunnels. Coupled with that has been a concerted effort by operators to reduce their labour costs by not installing cash-booths on new segments.

There is now a movement to withdraw cash-booths from even the most longstanding of toll-roads. A change of great symbolic significance is the announcement that the cash-booths on the Sydney Harbour Bridge will be withdrawn at the end of January 2009 ('Last cash booths on bridge to close', Sydney Morning Herald, Thursday 18 September 2008)

All tags are essentially identified payment tools. Further, as far as the APF can tell, none of the tolling schemes in Australia has a practicable anonymous option, and some have not even put up a pretence.

The effect of the withdrawal of cash booths has accordingly been that anonymous use of public roads is precluded.

Further, the designs for smartcard-based ticketing for rail, bus and ferry services have in most cases excluded an effective anonymous option, or have imposed high levels of inconvenience or foregone savings.

Together, these developments have a potentially very serious impact on the freedom of movement within the country

Most sets of privacy principles include a requirement that anonymity be supported, and freedom of movement is fundamental to declarations of human rights such as UDHR and ICCPR.

Would you please advise what actions you are taking to bring these serious problems to the attention of Ministers, in order to ensure that anonymous options are designed-in, or retro-fitted to, travel payment schemes.

Thank you for your consideration.

Yours sincerely

Roger Clarke
Chair, Australian Privacy Foundation
(02) 6288 6916 chair@privacy.org.au

The APF – Australia’s leading public interest voice in the privacy arena since 1987
Ms Karen Curtis  
Privacy Commissioner  
Office of the Privacy Commissioner  
G.P.O. Box 5218  
Sydney NSW 2001  
KarenCurtis@privacy.gov.au  

Dear Karen

Judge K V Taylor AM RFD  
Privacy Commissioner  
NSW Privacy  
Locked Bag 5111  
Parramatta NSW 2124  
Ken_Taylor@agd.nsw.gov.au, Kenneth_Taylor@agd.nsw.gov.au  
cc. Philippa_O'Dowd@agd.nsw.gov.au (Ken Taylor)  

Dear Judge Taylor

Ms Helen Versey  
Privacy Commissioner  
Privacy Victoria  
G.P.O. Box 5057  
Melbourne VIC 3001  
Helen.Versey@privacy.vic.gov.au  

Dear Helen

Ms Zoe Marcham  
Information Commissioner  
Office of the Information Commissioner  
G.P.O/ Box 3750  
Darwin NT 0801  
zoe.marcham@nt.gov.au  
http://www.infocomm.nt.gov.au

Dear Zoe

The Hon. John von Doussa  
President  
Australian Human Rights Commission  
GPO Box 5218  
SYDNEY NSW 2001  
paffairs@humanrights.gov.au  

Dear Mr von Doussa

Michael Gorton AM  
Chairperson  
Victorian Equal Opportunity and Human Rights Commission  
Level 3
Dear Mr Gorton

Dr Helen Watchirs
Human Rights and Discrimination Commissioner
A.C.T. Human Rights Commission
G.P.O. Box 158
CANBERRA ACT 2601
human.rights@act.gov.au

Dear Dr Watchirs