



REQUEST FOR CLARIFICATION OR INTERPRETATION

C02001

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GISB Standard Number: 1.3.64

Clarification or interpretation request:

Standard 1.3.64 states:

At a minimum, the Transportation Service Providers (TSP) should be responsible for accommodating Title Transfer Tracking (TTT) services at all points identified by the TSP as pooling points, where TTT services are requested. In absence of existing pooling points or in addition to existing pooling points where access to TTT activity is not reasonably accessible for supply receipt locations covered by an OBA, TSPs should be responsible for accommodating TTT at no less than one location.

And Standard 1.3.66 states:

All Third Party Account Administrators (3PADS) wishing to provide title transfer tracking services shall so notify the Transportation Service Provider (TSP). All coordination between 3PADS and a TSP should be performed under a contract between the parties. Where the TSP is a Title Transfer Tracking Service Provider on its system, tariff provisions (terms, conditions and rates) or general terms and conditions of the TSP, may take the place of a contract.

Possible interpretations or clarifications, if known:

*Please clarify that the obligation of the TSP to accommodate TTT services arises in the context of services requested to be performed by TTTSP's. While a TSP could provide TTT services, if a TSP provides the means for a 3PAD to provide TTT services consistent with Standard 1.3.66 (i.e. to act as TTTSP), that the TSP has met its obligation to accommodate TTT under Standard 1.3.64*