

Final ~~rst~~ draft (redline) of response to Request for Interpretation C02001

Text of Request:

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

Restated Request:

Please clarify that the obligation of the Transportation Service Provider (TSP) to accommodate Title Transfer Tracking (TTT) services arises in the context of supporting services requested to be performed with respect to TTT on its system by Title Transfer Tracking Service Providers TTTSP's (i.e., Third Party Account Administrator(s) 3PAD(s) and the TSP providing TTT services with respect to TTT on its system). While a TSP could also provide TTT services, to the extent a TSP provides the means for a 3PAD to provide TTT services consistent with Standard 1.3.66 (i.e. to act as TTTSP), has the TSP met its obligation to accommodate TTT under Standard 1.3.64?

Related Standards

1.3.64, 1.3.66

Text of Interpretation:

Yes, a TSP is not required to itself take on the role of a TTTSP and offer TTT services. The TSP is required to support 3PAD(s) requesting the TSP to enable the 3PAD(s) to provide TTT services with respect to transactions arising from and terminating in activity on the TSP's system consistent with Standards 1.3.64 and 1.3.66.