

**MINIMUM REQUIREMENTS
TO HOST
THE TEXAS STATE SPORTING CLAYS CHAMPIONSHIPS**

Objective:

The Texas State Sporting Clays Championship constitutes the largest regional Sporting Clay events in the state of Texas, as well as being one of the largest State Shoots in the United States. This shoot is currently awarded on a fixed rotational basis, with the host club knowing well in advance when they will be the producers of this major tournament.

The planning and infrastructure requirements for this event go well beyond what may be needed for producing a typical routine week-end or monthly club tournament. With that understanding, the Texas Sporting Clays Association, which is the sanctioning authority for the Texas State Championship tournaments, created this document. It outlines the basic requirements that must be installed or established, in order to produce a championship tournament that ensures a consistently safe, challenging, and rewarding experience for all.

Purpose:

The purpose of this document is to describe a set of clearly defined minimum requirements that must be adhered to by the submitting club for hosting any future Texas Sporting Clays Association (TSCA) sanctioned championships.

These requirements will apply to all sanctioned shooting events, the club facilities and capacities, and the infrastructure and amenities required to hold a multi-day Texas Sporting Clay championship clay target event.

Scope:

These minimum requirements will apply to all shoots that are sanctioned by the TSCA. Currently this requirement will only pertain to the Texas State Sporting Clay Championship, but the TSCA Board will reserve the right to include any future shoot event under this minimum requirement standard. The elements listed herein constitute a minimum set of requirements and will be subjected to periodic audits by representatives of the TSCA in advance of key deadlines and the event dates. A separate companion document will be created to show all critical timeline specifications and course elements and may be used as a checklist to ensure advanced planning and decision deadlines are met and communicated to the TSCA on a timely basis as required by TSCA directors or committee members.

Hierarchy of Documents:

A published Official Shoot Program and advance flyers, which has been approved by the TSCA, shall govern all aspects of TSCA sanctioned tournaments. A section in this document is dedicated to the requirements and approvals needed to publish and distribute the Official Shoot Program.

In the case of conflicting or omitted requirements, this document, along with the current revision of the NSCA rulebook will take precedent in settling all disputes.

<http://www.nssa-nsca.org/index.php/nsca-sporting-clays-shooting/nsca-sporting-clays-shooter-information/nsca-sporting-clays-rule-book/>

AGREEMENTS

Purchases:

In an effort to protect the TSCA, outside vendors within our Industry, as well as the host club, the TSCA shall have the right to monitor all contractual agreements with any or all outside vendors who are supplying products or services to the host club specifically purchased or services provided to produce and manage the State Championship shoot.

The host club shall have 30 days after the conclusion of the shoot to settle all invoices from these vendors and suppliers and remit a copy of the payment records to the TSCA for review. If there is a dispute between the host club and a vendor, the host club shall notify the TSCA board, and disclose the nature of the dispute. The Board may then make allowances for the time needed to negotiate a reasonable settlement between the host club and the vendor. Any host club that does not pay undisputed service and product invoices within this time period will be asked by the Board to make the payment immediately.

If the requested payment is not made in a timely manner, all TSCA sanctioned shoots for the remainder of that shoot year will be cancelled, until such time a settlement has been made. If a settlement has not been reached by the end of the calendar year, all TSCA sanctioned shoots going forward will be forfeited, and the host club will be removed from the State Shoot rotation at the TSCA Boards discretion.

Contract:

By formally agreeing to the minimum requirements set forth in this document, the host club is obligated to the TSCA to produce the Texas State Championship meeting all the requirements outlined within these Minimum Standards. An agreement will be developed between the Host Club and the TSCA to govern the Texas State Championship 12 (twelve) months in advance of the shoot date.

PROMOTION

ADVERTISING:

All print advertising intended for publication needs to include the following:

- All ads must be full color (no black and white) and listed in one or both Sporting magazines (Sporting Clays®, Clay Target Nation©).
- Shoot dates (starting and ending dates inclusive).
- Total dollar payouts and awards for the shoot.
- A list of awards and payouts for all classes in Main event.
- Indicate which awards/payouts are for Texas members and which are for out-of-state attendees
- Listings of all events and the number of targets for each.
- Website addresses for additional information and sign up.
- A list of host hotels for the event.
- A list of sponsors for the event.
- Inclusion of the TSCA logo (mandatory) in all ads.
- Additional TSCA information (like Hospitality tents) may be included as well.

NAMING CONVENTION:

- Events, from this point forward, shall be known as the following:
“The (year) TSCA Texas State Sporting Clays Championships”
- All documents, flyers, and advertising are required to use this naming convention.
- Within 10 (ten) months of the Championship date, TSCA has the right, but not the obligation, to select a title sponsor for the Texas State Sporting Clays Championship.

PRESS KIT:

- A press kit shall be completed and submitted to the TSCA for approval between 9 and 6 months before the shoot.
- The press kit shall be mailed to all TV, Radio, and newspaper outlets in the host club city at least 90 days before the shoot.
- There should be a specific contact person listed in the press kit that shall be responsible for dealing with TV, radio, and newspaper inquiries.

EVENTS

CHAMPIONSHIP EVENT:

- 2 separate 100 target courses set with a minimum of 12 stations, and no more than 14 stations.
- Must be shot over two days, any deviation or changes from this format must be approved by the TSCA Board of Directors.
- 4 specialty target machines per course and at least 1 tower target thrown per event.
- Towers are defined as any structure, including natural terrain, with a minimum height of 25 ft. above the plane of the shooting station.
- Specialty targets are defined as midi, rabbit, battue, or 70mm, and can be used in any combination.

PRELIMINARY EVENT:

- 1 separate 100 target course set with a minimum of 12 stations.
- This event must be available on 2 days which must include Saturday.
- 2 specialty target machines per course and at least 1 tower target thrown per event.
- There must be at least 1 Preliminary event, but additional Preliminary events on Wednesday and Thursday is suggested. Awards for these events will be the responsibility of the host club. The awards must meet the prior approval of the TSCA Awards Committee.
- A final “Adios Cup” event is also suggested, but not required. Awards for this event will be the responsibility of the host club. The awards must meet the prior approval of the TSCA Awards Committee.

5- STAND EVENT:

- Shall be 100 targets set over 4 layouts to include at least one specialty trap per layout.
- Shall include at least 1 tower over the four layouts.
- Each layout of 25 targets must have a minimum of 6 trap machines, and a maximum of 8 machines.
- All machines must be properly marked
- Menu signs must be placed in front of each 5-Stand cage.

FITASC EVENT:

- Either 100 or 200 targets set over 4 or 8 parcours and shall include at least one specialty target per parcours.
- 3 shooting pegs per parcours are acceptable.
- This will be recognized as a “State Championship”.

SMALL GAUGE EVENT: Pump and S x S

- 100 targets, set over two dedicated communal courses, for each of the 28 gauge and 20 gauge events and 410 pump and SxS. At least two specialty targets shall be included per course.
- There is also the option for the host club to throw 3 separate courses, one for each gauge, space and machines permitting. Each course would have to meet the above specialty target criteria for a 100 bird event.
- A 100 target event shall have a minimum of 12 stations.
- On each communal course, each station should have at least 3 different traps and two different shooting positions, to facilitate a different presentation from each cage.
- These sub gauge events will NOT be allowed to be shot on any other format, unless approved by the TSCA board of Directors prior to the event.
- Awards for this event will be the responsibility of the club. The awards must meet the prior approval of the TSCA Awards Committee or assigned Director.

COURSE MANAGERS, TARGET SETTERS, TRAP MECHANICS and VETTING TARGETS:

- Each event is required to have an assigned, qualified Course Manager / Chief Referee, capable of making decisions on the spot and qualified to run a course efficiently.
- All events must have trained score keepers. All scorekeepers must have experience scoring NSCA registered tournaments and preferably shall have passed the NSCA referees test. Provisions should be made for extra referees on-call to facilitate personnel rotation and provide back-up in the case of absences.
- Designated courses shall be ready for TSCA Vetting no less than ONE FULL DAY before the Championship starts.
- Each event must have at least one assigned trap mechanic with electronic communication.
- All targets shall be set by a TSCA Board of Directors approved, recognized, and experienced target setter. Clubs are required to submit the names of each target setter of each event in their bid proposal to host this event. Should an approved setter not be able to perform, and a new setter comes in, he / she must have approval of the President of the TSCA prior to the event.
- It is recommended that each course of the main event have a different target setter, but this is not mandatory. A TSCA appointed Target Committee or assigned Director will approve all courses prior to the start of each event.
- Side events can be set by lesser known target setters, in order to cultivate new setters for the future. These target setters must be approved by the TSCA Board or assigned Director 9-12 months before the shoot.

PRACTICE:

- At least one practice field must be made available consisting of a minimum of 5 Stations or a 5-stand type layout with a minimum of 6 machines throwing a minimum total of 20 targets.
- Practice fields must be made available 45 minutes prior to the first rotation of the day for any event and must remain open until the start of the last rotation of the day. It is permissible to throw all practice birds from one stand with no rotation.
- The price of practice rounds to shooters should be entered in the shoot proposal 12 months before the shoot.
- All flyers, entry forms and programs shall have the price of practice targets listed.
- The price of 20 practice targets shall not exceed \$8.00 without the consent of the TSCA Board or shoot committee in charge.

SIDE GAMES:

- There shall be at least one added game of “Make a Break” or “Snooker” layout, with a minimum of 7 traps, available from noon until at least 5 p.m. on Thursday and Friday, and 9 AM until 4 PM on Saturday and Sunday.
- These games shall include a shooter’s pot “Top Eight Shoot-off” that will commence on Saturday at 6:00 PM. Cutoff time for qualifying entries in the “Top Eight Shoot-off” will be 4:00 PM on Saturday. These games may be shot by any shooter and no shooter will be required to play the “Top Eight Shoot-off” pot in order to participate.

- Additional games such as “long bird”, Tower pairs etc. are encouraged. The price of these to be determined by the host club.
- The Entry Form, advertisements, program and signage shall indicate the cost of the targets, and method for entry.

PROTEST COMMITTEE:

- The host club shall assemble a protest committee consisting of 3 (three) qualified individuals that have extensive experience with enforcing NSCA rules. At least one member of the committee should be a certified NSCA referee.
- At least one member of the Protest Committee shall be a TSCA Board member.
- The Protest Committee may also include the range owner or host, if qualified.
- It is recommended that all protest committee members be certified NSCA referees.
- The members of the Protest Committee should be listed in the shoot program as well as posted at the registration desk.

FACILITIES & INFRASTRUCTURE

DURATION:

- Host club and TSCA shall agree on duration (4 or 5 days) of the event when 500 or more attendees are expected.
- Typically, the Host Club should have sub-gauge, SxS, pump and possibly FITASC events available to be shot on Wednesday of a 5 day event.
- Agreement to be reached 6 or more months prior to the Championship.

CLUBHOUSE / DINING / MEETING FACILITY:

- The host club shall provide access to a clubhouse or covered pavilion of at least 800 sq. ft. and shall be equipped with at least 4 (four) restrooms.
- The pavilion may be a rented tent.
- Cooling via fans, misting system or air conditioning must be provided for the Saturday evening dinner and awards banquet, **no exceptions**.
- There shall be an exterior scoreboard, or monitor, of sufficient size to post all scores of every event and shall be placed in a designated area for all shooters to view.
- Provisions shall be provided to post messages and lost / found information.
- The clubhouse shall be equipped with a functioning PA system for general announcements and emergency notifications.

RESTROOMS:

- It is required that each sporting clays course has a minimum of two restrooms available: one at or near station # 3 and one at or near station #9. Portable rental toilets may be used.

- The clubhouse area shall be equipped with at least 4 permanent or portable rental toilets, with 2 (two) designated strictly as women's restrooms.
- It is required that there be a minimum of 1 restroom facility on the small gauge course.
- 2 (two) Portable rental toilets are required on the FITASC course.
- 2 (two) Portable rental toilets on the 5-stand layout.
- All restrooms must contain toilet paper and be serviced routinely. A bottle of non-water hand wash will be provided in each portable toilet.

HEALTH and SAFETY:

- There shall be tents (12x12 recommended) erected at every third station at every event and 2-4 at the FITASC and 5-Stand events.
- There shall be at least 1 (one) cooler with ice and bottled water, at every 3rd (third) station of every course.
- Fruit and snacks should be provided on each event course and regularly re-supplied.

WATER TRUCK:

- In the situation where any of the events are on trails without pavement and there is a possibility of dust being kicked up by cart and vehicle traffic, the club shall furnish a watering truck to keep trails watered down to prevent excessive dust.
- This shall be done on a scheduled basis prior to the start of the tournament and throughout the day while keeping the inconvenience to shooters to a minimum, or as directed by a TSCA Board member.

SIGNAGE:

- All courses shall be marked with legible signage. Directional markers shall be used to direct shooters to the proper location.
- All shooting stand numbers shall be clearly marked and identifiable from the cart path. Each shooting stand shall contain a menu with a description of targets being thrown.
- Additional caution tape may be utilized to designate non-entry areas and keep course workers and shooters safe.
- All signage shall be of appropriate size and dimension to convey the intended message.
- No "Handmade" signs will be acceptable, unless it is an emergency situation.

AMMUNITION:

- Only factory loaded ammunition (no re-loaded ammunition) will be allowed in any TSCA State Championship or Side event.
- No shot size larger than 7½ shall be allowed on any TSCA registered targets.
- No shot weight greater than 1&1/8 ounce shall be allowed on any 12 gauge registered TSCA sporting clay event.
- No shot weight greater than 1 ounce shall be allowed on any TSCA registered FITASC event.

- The proper shot payloads for the sub-gauges are: 20 gauge = 7/8 ounce, 28 gauge = 3/4 ounce, and the .410 = 1/2 ounce, as designated by the NSCA rule book and adhered to by the TSCA.
- Ammunition rules should be included in the Championship Program.

STATIONS:

- All shooting positions must be affixed to the ground by means of stakes or other fastening devices.
- All stations, except FITASC, must have an NSCA approved cage, with both side restraints and a horizontal crossbar. Hoops affixed to the ground may be used in FITASC.
- Each station must have a sitting bench provided.
- A drum style garbage can shall be placed at each station of sporting and at each layout of FITASC. Garbage removal will be done on a daily basis, or more frequently if needed.
- A menu shall be posted describing the presentation, bird type and number of pairs to be presented at every station.

PARKING:

- Sufficient parking shall exist around the clubhouse area and any courses / layouts that are remote or stand alone.
- There must be a separate designated parking area for golf cart trailers.
- Security will be provided to protect all shooter property and must be on site 24 hours a day during a TSCA tournament.

FOOD SERVICE:

- Food service of some type must be available on-site with sufficient capacity to furnish breakfast, lunch and snacks to a minimum of 500 (five hundred) shooters throughout each day.
- A varied menu with multiple selections shall be available, and multiple food vendors would be preferred to allow participants sufficient time between scheduled events. Soft drinks, Gatorade®, and bottled water shall be made available to all participants (whether shooting, spectators, or refereeing/trapping).
- Food service details shall be included in the shoot program.

VENDORS:

- The host club shall provide ample space for commercial trailers, tents or vendor set-up with easy access for the shooters. This shall include a vendor space that is relatively clean, with minimal dust. This space must also be in a spot that will not be adversely affected by rain or mud. No vendors shall be located “off in the corner”.
- The host club shall begin sending out vendor information 9 (nine) months before the shoot to ensure the vendors have time to sign up and get the shoot on their calendar. This vendor packet shall provide all the logistical information, including price, space size, location, deadlines, and payment policy.
- The host club shall provide all vendors with either access to electricity or the ability to use a gas-powered generator for the duration of the shoot. No exceptions.
- Vendors shall be allowed to display ample signage for help in promotion.

- All vendors shall be included in the printed program for the shoot.

RV/CAMPER SPACE:

- The host club shall have adequate on-site or nearby (within a 30-minute drive) camper facilities for a minimum of 10 (ten) self-contained RV / Campers or dry camping on site must be allowed for clubs without full RV facilities. If a club does not have on-site RV capability, then additional information on neighboring RV parks is mandatory as part of the shoot flyer and printed program and must be listed on the website.
- The fees for camper site rental along with contact information shall be included in the Official Shoot program.

SHUTTLE TRANSPORT:

- The host club shall provide a shuttle transportation system that will enable shooters to reach remote shooting venues if the venue is substantially removed from a vehicle parking area.

MEDICAL SERVICE:

- If the local emergency service response time is more than 10 minutes, a certified EMT shall be required on-site. It is also recommended that the host club have a medical transportation vehicle on-site.

SHOOTER SERVICES

SHOOT PROGRAM:

- Each prospective shooter shall receive an Official Shoot Program with entry application.
- This program will include a listing of all events, pricing and schedules, award structure, options, as well as any official rules that specifically apply to this Shoot.
- Also included in the Official Shoot Program shall be information pertaining to ammunition availability, food services, RV camper availability, host hotels, area map, club map with course locations, and a page of all past champions.
- The Shoot Program will be posted on the TSCA website.
- In the case of any conflicts between any shoot advertisements and the Official Shoot program, the program will govern the outcome. TSCA officials shall approve the Official Shoot Program prior to the publication deadline.
- The host club is encouraged to sell advertising space in the shoot program. All monies received from the advertisements belong to the Host club. This may be used to help offset the cost of production and mailing.
- The front covers of both State Championship Shoot programs shall include the official TSCA Logo, which will be supplied by the TSCA.
- There will be two dedicated pages in the shoot program, reserved for use by the TSCA, for the purpose of promoting the State organization and the State Championship shoots.

SHOOT DATE:

- The host club shall obtain TSCA approval for all proposed shoot dates which will be posted on txclays.com.
- These dates must be published within 30 days of being selected by, and awarded to, the host club.
- The TSCA approves a rolling 4 year or more schedule of Host Clubs and shoot dates in the 4th calendar quarter of each year as per its bylaws.
- The list shall be posted on txclays.com immediately following approval.

TARGET REGISTRATION:

- All Texas State shoot events will be registered and NSCA/TSCA daily fees charged.
- If any additional fees are added to the published entry fee, the amounts must be disclosed in the application and all programs, shooter forms and advertisements.

SHOOTER REGISTRATION:

- The proposed registration form shall be submitted to the TSCA for approval, and this submission should be between 6 (six) and 9 (nine) months prior to the shoot date.
- Once approved by the TSCA, the pre-registration form should be available on the host club website, as well as posted on txclays.com and shooterspages.com.
- The entry form should be available no earlier than Dec 1st of the year prior to the upcoming State Shoot.
- The host club may elect to mail the individual entry forms or use their website registration.
- The completed Official Shoot Program of all events, number of targets, awards and payouts shall be finalized before the registration process goes live.

PRE-REGISTRATION:

- All shooters may pre-register in advance for any event with a minimum required deposit of \$100, plus any published required golf cart deposit.
- The host club may require options to be paid in cash or check.
- The host clubs' refund policy must be clearly stated on the registration form as well as the Official Shoot program. It shall clearly address how the policy will be enforced in the case of shooter withdrawal, or event truncation or cancellation by shoot management.
- The host club shall settle all reimbursement of returnable funds within 10 business days following the conclusion of the event.

SCORING:

The host club will be required to have an approved professional scorer for all registered shooting events listed in the Official Shoot program. The scorer selected shall be responsible for:

- accurate shooter classification
- squadding and squad changes
- collection of receipts payable

- providing shooters with their shooting schedules
- certifying and publishing event score results
- identifying class and concurrent winners
- calculating and publishing all option monies distributed
- host club will provide “write in rain” score cards

Professional scorers that currently have approval from the TSCA are:

- Lois Lessing - <http://www.wyshotgun.com/>
- Casey Chase - <http://www.chshootresults.com/>
- Colette Rodgers - colette@elmfork.com
- Other professional scorers may be added to this list with prior approval from TSCA officials or committee member(s).
- Computer based scoring systems that are currently approved for use by the TSCA are iClays©, Winscore© and ScoringPro. TSCA Board reserves the right to add, delete or alter the list of approved Computer Scoring service providers at its discretion.

SQUADDING:

- All events will be squadded.
- European rotation shall not be allowed except on the sub-gauge events and SxS, pump events, or Side Games.

SHOOT-OFFS:

- All events that that have a State title associated with them will be shot-off for the HOA, and the respective class titles, no exceptions.
- All other ties may be broken with station tie-breakers or other predetermined methods.
- All tie breaker requirements and methods must be published in the shoot program, as well as posted on the official scoreboard.
- The host club shoot staff shall be educated in the shoot-off process and shall be able to direct the shooters to the shoot-off coordinator.
- The host club shall be responsible for staffing and executing all shoot-offs.
- The host club shall identify a shoot-off coordinator, whose function is to ensure all eligible participants are identified, and the time & location of the shoot-off is communicated.
- Shoot-offs for all events must be conducted near the clubhouse, with a layout that shall be used exclusively for the purpose of the shoot-offs.
- All Sporting Clay shoot-offs will be governed according to NSCA/TSCA rules.
- All FITASC shoot-offs will be governed according to FITASC governing body rules.

AWARDS:

It is intended that the awards for the Texas State Championship winners be of the highest quality and fully reflective of the significance associated with winning any Texas State Championship event. To ensure that this

very important aspect receives the correct attention, the TSCA will appoint an Awards Committee or Trophies Director, whose function is to coordinate with the host club the various assigned responsibilities.

The trophies for the 5-stand, Preliminary, Main events and FITASC will be selected and procured directly by the TSCA, based on recommendations from the Awards Committee or Trophies Director.

- TSCA Texas State Championship and RU trophies may also be given by the Host Club.
- Awards for all of the remaining events will be the responsibility of the host club.
- A proposed award structure for these events shall be submitted by the host club to the TSCA Awards Committee or Director six months to one year prior to the shoot date.
- The proposed physical award shall be submitted by the host club to the TSCA Awards Committee or Director at least six months prior to the shoot date.
- The purchase orders for these awards should be placed within six months of the shoot date.
- The host club shall remit a sales acknowledgement that the purchase order for the awards has been placed, and that a ship/receive date, which precedes the start date of the State Shoot, has been acknowledged.
- All awards not picked up at the end of the shoot shall be mailed within 30 (thirty) days of the completion of the shoot.
- Host Club shall provide awards/cash payouts of its choosing to out-of-state attendees.
- Program and host club advertising shall be clear as to awards/payouts, trophies available to out-of-state attendees.

CASH PAYOUTS:

- A proposed cash payout structure for all events shall be submitted by the host club to the TSCA Awards Committee six months to one year prior to the shoot date.
- All cash payouts shall be mailed out within 10 (ten) days of the completion of the State Shoot.
- The Host club shall remit a spreadsheet showing all payout recipients, payout amounts, and date they were mailed, within 30 (thirty) days of the completion of the State Shoot.
- The host club shall remit a list of all award checks that remain un-cashed 60 (sixty) days after the completion of the State Shoot, to ensure that all winners have an opportunity to receive their payments.
- The TSCA will reimburse the host club for all moneys owed once all the above criteria have been met for both the Awards and Cash Payouts.

OPTIONS:

- Options shall be made available to all shooters in all events, and shall consist of, at a minimum High Overall (HOA), Class, and Lewis Class for each class designation.
- All participants who play an option shall receive a statement showing all distributions of winnings and payout information.
- All payouts and awards must be mailed within 10 (ten) business days after the shoot completion.
- Other options such as course options and station options are encouraged.

SOCIAL FUNCTION:

- The host club shall provide for a Saturday night social and dinner. The time and location of this function shall be published in the Official Shoot program.
- While a full dinner is not required, finger food and beverages are a minimum requirement.

GOLF CARTS:

- A sufficient quantity of golf carts shall be available to all shooters on a rental basis.
- The host club is allowed to request a mandatory deposit for golf cart rental on all pre-registration applications.
- The host club shall retain the authority to require a minimum age for rental or operation, require a valid driver's license, and require proof of insurance for personal golf carts used on host club property.

HOST HOTEL:

- The host club must have a minimum of 1 area hotels available to the shooters at a discounted rate.
- This discounted rate and the rate codes, along with address and phone numbers, must be listed in the Official Shoot program, advertising, website, and e-mailed entry form packages.

SPONSORS:

- Host Club may obtain event (Main, 5-Stand, etc.) sponsors with two exceptions. All arrangements with said sponsors are between the Host Club and the sponsor. TSCA shall have no involvement or obligation with the Host Club's chosen sponsor and TSCA will not be obligated to provide any financial or individual support in any manner.
- Exceptions:
 1. Right of First Refusal to sponsor the Preliminary rests with Lonesome Charlie Parker and his successors. No sponsorship fee is due or may be charged. Lonesome Charlie will provide trophy awards as arranged with TSCA's Trophies Director.
 2. TSCA has the right to obtain a Title Sponsor(s) to the Championship. In such cases, the Host Club shall include the Title Sponsors name/logo in all advertising, programs, electronic communications, and the like. All other arrangements, financial or otherwise, are solely between TSCA and the Title Sponsor.