

SCHOOLS CUP COMPETITIONS
REGULATIONS 2017-18

1. Introduction

- 1.1 All matches must be played in accordance with these Regulations, World Rugby Laws and Regulations (including any variations and trials that may be adopted by the RFU), ERFSU Rules and Regulations, and RFU Rules and Regulations (with particular reference to RFU Regulation 15 and any U15 and U18 Laws variations set out in Appendix 2 of RFU Regulation 15).
- 1.2 These Regulations apply to the Competition in the 2017-18 season and are effective from 1st August 2017.
- 1.3 For the purpose of these regulations, 'Competitions' shall mean:
- Under 18 Cup
Under 18 Plate
Under 18 Vase
Under 18 Bowl (together 'the Under 18 Competitions')
- Under 15 Cup
Under 15 Plate
Under 15 Vase
Under 15 Bowl (together 'the Under 15 Competitions')
- 1.4 Any other terms not defined in these Regulations shall have the meanings set out in RFU Regulation 1.

2. Organising Committee

- 2.1 The Competition will be administered by an Organising Committee who shall manage the delivery of the Competition and such organising committee shall be appointed by the RFU and ERFSU (the 'Organising Committee').
- 2.2 The Organising Committee shall have discretion to decide on matters not provided for in, as well as on the interpretation of, these Regulations in the context of the Competitions. This discretion shall include the interpretation of these Regulations in accordance with the underlying principles and intent (insofar as it can be ascertained) of the relevant regulation and in the interests of rugby union football.
- 2.3 Any interested party may seek clarification of any of these Regulations by submitting a question to the Organising Committee in writing.
- 2.4 Any educational establishment or other party who is affected by a decision of the Organising Committee on matters not provided for in the Regulations shall have a right of appeal against such decision in accordance with Regulation 18 below.
- 2.5 In the discharge of its responsibilities, the Organising Committee may further delegate some or all of the powers contained within these Regulations to any individual member(s) of the Organising Committee or to any staff member(s) of the RFU Rugby Events & Competitions Department.

3. Administration of the Competitions

- 3.1 The Organising Committee will determine the precise structure of the Competitions which is set out in Annex 1. The Organising Committee will place participating educational establishments into the U18 Cup, U18 Vase, U15 Cup or U15 Vase as appropriate.
- 3.2 The Organising Committee will carry out the draws. When conducting the draws, every reasonable endeavour will be made to minimise travel.
- 3.3 In all Competitions the first-named team in the draw is the home team and the second-named team is the away team, irrespective of where the game is actually played.
- 3.4 The Competitions will be based on a straight knockout format.
- 3.5 Educational establishments that fail to reach the second round of the U18 or U15 Cup) will automatically be entered into the U18 or U15 Plate respectively.
- 3.6 Educational establishments that fail to reach the second round of the U18 or U15 Vase will automatically be entered into the U18 or U15 Bowl respectively.

4. Eligibility of Educational Establishments

- 4.1 The Competitions will be open to educational establishments in membership of the ERFSU, subject to the remaining provisions of these Regulations and the discretion of the Organising Committee.
- 4.2 Any educational establishments participating in the RFU AASE Competition will not be eligible to participate in the Competitions.
- 4.3 Any educational establishment conceding a match will be removed from all Competitions for that season in respect of that age grade.
- 4.4 Any educational establishment which withdraws from any Competition in two successive years may be ineligible to enter that age group's competition in the following year. The decision on such eligibility will be made by the Organising Committee after consultation on the reasons for withdrawal. The decision will be made before the end of the second Season in which the withdrawal is made, and shall be subject to appeal pursuant to Regulation 18.

5. Eligibility of Players

- 5.1 Players must be under 15 years of age at 24:00 hours GMT on 31st August of the effective season to be eligible for the U15 Competitions.
- 5.2 Players must be under 18 years of age at 24:00 hours GMT on 31st August of the effective season to be eligible for the U18 Competitions.
- 5.3 Players taking part in a Competition must be on the roll of the participating educational establishment on 30th September of the effective season and still in attendance at the participating educational establishment, unless otherwise agreed by the Organising Committee.
- 5.4 All teams must comply with RFU Regulation 15, including eligibility requirements for playing up, and the restrictions on playing in the front row. U16s and U17s can only

play in an U18 match if the conditions of RFU Regulation 15.3.6 are satisfied. U16s cannot in any circumstances play in the front row of the scrum in any U18 match (unless the player is an England Academy Player and satisfies the requirements of RFU Regulation 15.3.8).

- 5.5 In the U18 Competitions only a total of three players who have joined the educational establishment in years 11, 12 and 13 are permitted to be part of the squad of players selected.

However, the foregoing shall not apply to educational establishments participating in the U18s Cup and Plate Competitions that have been granted Collegiate School status (the requirements for which are set out below).

- 5.6 Collegiate School status can be granted by the Organising Committee to educational establishments participating in the U18s Plate and Cup Competitions in the following circumstances:

- 5.6.1 If a state educational establishment provides education up to and including the age of 18 years of age and some of its pupils feed into its Sixth Form as part of a normal transfer at this age from a local School/College, or local Schools/Colleges, which only educate pupils up to the age of 16 years, it may apply to the Organising Committee for registration as a Collegiate School.

Collegiate Schools may select any number of such pupils, along with those which have come through the school anyway, to play in the U18 Competitions, provided that the Organising Committee has approved their application for registration as a Collegiate School in accordance with Regulation 5.6.2.

- 5.6.2 Only State educational establishments can apply for Collegiate School status. Any State educational establishment that wishes to register as a Collegiate School must complete and submit the relevant form. Applications must be submitted by a date determined and notified by the Organising Committee. The Organising Committee reserves the right to decline any application for Collegiate School status.

- 5.6.3 Where pupils in two or more educational establishments in the same area are taking one or more subjects in one educational establishment and one or more subjects in a second educational establishment, then players from both the educational establishments involved can play in the team of one or other of the institutions involved, provided that institution has been granted Collegiate School status in accordance with Regulation 5.6.2 above and subject to the approval of the Organising Committee.

Note: In recognition of the fundamental purposes of this Regulation (ensuring safety, fairness and equity for all participants), any team breaching any part of Regulation 5 risks disqualification from the competition.

6. Match Management

- 6.1 All matches must be played by the end of the stipulated week as detailed in Annex 2. Should this not be possible, the home team must contact the RFU Rugby Events & Competitions Department to apply for dispensation to play on an alternative date,

subject to agreement from the Organising Committee. Failure to comply with this Regulation will be a breach of Regulations.

- 6.2 The Organising Committee retains the right to specify the date and kick-off time for any match in the Competitions.
- 6.3 Apart from the Finals and the Semi-Finals and the Vase and Cup, the home team is responsible for arranging the fixture at a suitable venue (defined as the usual home pitch, or alternative school/club/artificial pitch).
- 6.4 Where the Home team is unable to provide a suitable venue for the match, the fixture must be reversed and played at the Away team venue to ensure the match is completed by the due date. If neither venue is available, the matter must be referred to the Organising Committee, which has the power to extend the date by which the Game must be played or to decide which team shall go forward to the next round. Failure to provide a suitable venue will also include being unable to provide a suitable venue in the event of bad weather.
- 6.5 Where a fixture is reversed in accordance with Regulation 6.4, the Home team will remain as published in the draw.
- 6.6 Where the first-named educational establishment to be drawn in a match plays its home fixtures in the Isle of Man or the Channel Islands, the match shall, unless both educational establishments agree to play off-shore at the expense of the off-shore educational establishment, be played on the mainland of England on the ground of the second-named educational establishment to be drawn.
- 6.7 The best possible venue must be used. Where appropriate, every attempt must be made to rope off the pitch.
- 6.8 U15 matches will be 30 minutes each way. Half-time will be 5 minutes, with both teams staying on the Field of Play.
- 6.9 U18 matches will be 35 minutes each way. Half-time will be 5 minutes, with both teams staying on the Field of Play.
- 6.10 Should a fifty-point differential occur at any time during a match, the Referee may end the match and the result at that time will stand, unless both teams are in agreement to continue.
- 6.11 The home team must advise the Referee that the appointment is to a Competition fixture and advise him/her of the Competition Regulations and appropriate Law Variations.
- 6.12 Where a match has not been played, or the result of a match remains unresolved, by the end of the stipulated week, the Organising Committee may, in its sole discretion, determine which team (if any) will progress in the competition(s). This power will only apply to situations where there is no other opportunity to play/replay a match and the successful delivery of the competition(s) is at risk.
- 6.13 The Semi-Finals of all the Competitions, and the Plate and Bowl Finals will be played at a venue and on a date to be determined by the Organising Committee.
- 6.14 The Cup and Vase Finals will be played at Twickenham on such date to be determined by the Organising Committee.

6.15 In all matches in the Competitions, educational establishments must select their strongest squad of eligible players (being the starting 15 and a maximum of 7 replacements).

7. Replacements / Substitutions (see Under 15 and Under 18 Law Variations)

7.1 The number of replacements and substitutes in attendance at all matches shall be no more than seven.

7.2 Rolling Substitutions are permitted in all the Competitions. A player who has been substituted may later replace any player, whether or not that player has been injured (subject to Regulation 7.4).

7.3 In the interests of safety, each team must have nominated in advance at least five suitably trained and experienced front row Players in their nominated match squad, to ensure that: (a) on the first occasion that a replacement hooker is required, the team can continue to play safely with contested scrums; and (b) on the first occasion that a replacement prop is required, the team can continue to play safely with contested scrums.

7.4 If on any occasion a front-row player requires to be replaced and his team cannot (for any reason, including injury, temporary blood injury, temporary exclusion following a yellow card, or permanent exclusion following a red card) provide a replacement, or another suitably trained and experienced player from the nominated squad, to enable the match to continue safely with contested scrums, the Referee, having made enquiry of and having confirmed this fact with the manager of the team (or such other person nominated by the educational establishment as the person responsible for the team), the match will continue with uncontested scrums. The team concerned shall not be entitled to replace the player whose departure caused the uncontested scrums and (subject to Regulation 7.6 below) the final result will stand. On return to the field of play of the front-row player who had been temporarily excluded or injured, the Match shall continue with contested scrums.

7.5 In the unusual event that a Referee decides to continue the game with uncontested scrums on the grounds of safety, because he cannot safely manage the scrums otherwise, the final result will stand, subject to Regulation 7.6.

7.6 The Organising Committee may review the circumstances where a match is completed with or contains uncontested scrums and in its sole discretion may impose penalties in accordance with Regulation 17, subject to the right of appeal set out in Regulation 18.

8. Drawn Matches

8.1 There will be no extra time in any round.

8.2 In the event that the scores are level at the end of a match (other than the Semi Final and Final), the winner of the match will be the team that has scored most tries in the match. If this does not produce a winner, the team that has scored the most goals from tries will proceed to the next round. If this still does not produce a winner or the score is 0-0, the away team shall proceed to the next round.

8.3 In the event the scores are level at the end of the Semi Final, the following order of events shall be applied in order to determine the winner of the drawn match: number of tries, number of conversions from tries, first try, first points. If this still does not produce a winner or the score is 0-0, the away team shall proceed to the next round. The away team shall be determined by a toss of the coin prior to the commencement of the match.

8.4 In the event that the scores are level at the end of the Final, the following order of events shall be applied in order to determine the winner of the drawn match: number of tries, number of conversions from tries, first try, first points. If this still does not produce a winner or the score is 0-0, the trophy will be shared.

9. Postponed or Abandoned Matches

9.1 Weather Conditions (including bad light)

9.1.1 Postponed Match

If weather conditions (including bad light) prevent a match being played, despite the teams having followed any Postponed Match Notification Procedure as may be notified to the participating educational establishments by the Organising Committee, the match will be played at a later date unless the Organising Committee exceptionally, and in its absolute discretion, agrees/specifies otherwise.

9.1.2 Abandoned with Fewer than 50 minutes played

If the match is abandoned solely because of the weather conditions (including bad light) when fewer than 50 minutes have been played, the match will be replayed unless the Organising Committee exceptionally, and in its absolute discretion, agrees/specifies otherwise.

9.1.3 Abandoned with 50 or more minutes played

If a match is abandoned solely because of weather conditions (including bad light) when fifty or more minutes have been played, the score at the moment of abandonment shall stand and be deemed the final score in the match. The Referee's decision as to the necessity for abandonment and the number of minutes played at the moment of abandonment shall be final.

9.2 Other Reasons

If the Referee finds it necessary to abandon a match for any reason other than weather conditions (including bad light), irrespective of the number of minutes played, the result of that match shall be reviewed by the Organising Committee. The Organising Committee may order the match to be replayed and/or impose such other sanction as it deems appropriate. The Referee's report must be submitted on why play was curtailed.

10. Notification of Results

10.1 The home educational establishment must inform the RFU Rugby Events & Competitions Department (*see contact details below*) of the result within 2 hours of the end of the match.

10.2 Contact details at the RFU Rugby Events & Competitions Department:

U18 Competitions/Regulations:
Tel: 0203 118 3136
Email: U18schoolscup@rfu.com

U15 Competitions/Regulations:
Tel: 020 8831 6784
Email: U18schoolscup@rfu.com

11. Team Sheets

- 11.1 Each educational establishment in every round of each Competition must complete and retain a copy of a Team Sheet of the 15 starting players and a maximum of 7 replacements. From Round 4 onwards, educational establishments must also submit a copy to the RFU Rugby Events & Competitions Department, within 72 hours of the final whistle of each match they play, signed by the Team Manager.
- 11.2 The Team Sheet will contain the following information:
- a) Full Name of Player
 - b) Date of Birth of Player
 - c) School attended in Year 11 (U18 only).
- 11.3 Each Team Manager **must** sign their own team sheets (where indicated) prior to the start of the match. The Team Sheet must be retained by the Team Manager for future inspection by the Organising Committee or its representative(s).
- 11.4 Each educational establishment must ensure that information provided on a Team Sheet is accurate and legible. Failure to submit a team sheet, or late submission, will render an educational establishment liable to sanction. The provision of false or misleading information on players or replacements is a serious breach of these Regulations and may give rise to a severe penalty.

12. Kit

- 12.1 Each team is responsible for ensuring that there is no clash of colours and that all its kit complies with World Rugby Regulations.
- 12.2 The first-named team will change shirts in the event of a clash of colour.
- 12.3 All teams in the Quarter-Finals, Semi-Finals and Finals must wear numbered shirts.

13. Referees

- 13.1 The home team shall seek an independent Referee through its local Referees' Society.
- 13.2 If a Referees' Society is unable to appoint a Referee, the home team may ask a **neutral** educational establishment to provide an experienced member of staff to act as Referee or to recommend a neutral, experienced referee from outside the educational establishment. This is only permissible if the away team is notified in advance, and both educational establishments playing in the competition are in full agreement with this arrangement prior to the game being played.
- 13.3 If a Society or neutral referee is not available, the away team must be offered the opportunity to provide a referee, or they can consent to a proposed home referee.

13.4 For the Quarter-Finals, Semi-Finals and Finals, Match Officials will be appointed by the RFU, unless otherwise delegated to a participating educational establishment.

14. Accommodation & Travel Expenses

14.1 For the Semi-Finals and Finals, accommodation will be arranged by the RFU Rugby Events & Competitions Department.

14.2 A contribution towards transport costs for the Semi-Finals and Finals will be made through the RFU Rugby Events & Competitions Department.

14.3 For funding purposes, the travelling party will consist of 26 per team – 22 players, 3 members of staff and 1 coach driver.

15. Disciplinary Procedures

15.1 When any player is ordered off or cited in any match in any of the Competitions, the Age Grade Disciplinary Procedures set out in Appendix 6 of RFU Regulation 19 will apply.

15.2 A player that has been ordered-off in any match (prior to or during the competition) is provisionally suspended and may not play in any forthcoming match or participate in any on-field match day activity (either for Club or any educational establishment) until that player has been dealt with by a disciplinary panel and any sanction that has been imposed has been served. For the avoidance of doubt, a player that is cited by an opposition team is not provisionally suspended pending their disciplinary hearing.

16. Disputes and Breaches of Regulations

16.1 Subject to Regulation 16.4 and Regulation 18 below, and in accordance with Regulation 17, the Organising Committee shall have the power to discipline any educational establishment or person for breach of any of these Regulations and/or any RFU Regulations. Ignorance of any such regulations cannot be deemed an excuse in the event of breach.

16.2 Acting either on its own initiative, or on an allegation of a breach of any of these Regulations, RFU Regulations and/or World Rugby Regulations by an educational establishment from an identified third party, the RFU Rugby Events & Competitions Department may review any aspect of the Competition. Any allegation shall be notified in writing to the RFU Rugby Events & Competitions Department within three school working days of the final whistle of match giving rise to the allegation. The party alleged to be in breach shall be notified of the allegation within two school working days of the details, and shall have three school working days, from its receipt of notification of the allegation, to respond.

16.3 If any member of a County Schools' Union becomes aware of a breach, or potential breach, of these Regulations, ERFSU Rules and Regulations, RFU Rules and Regulations, or World Rugby Regulations, he/she is required to notify the RFU Rugby Events & Competitions Department within 48 hours of knowledge of the occurrence or facts giving rise to the allegation. Failure to comply may be a potential breach of RFU Rule 5.12 (Bringing the Game into Disrepute).

16.4 Any breaches by adults will be dealt with in accordance with RFU Regulation 19 and any breach by Age Grade players will be dealt with in accordance with Appendix 6 of

RFU Regulation 19.

17 Sanctions

- 17.1 Having received the RFU Rugby Events & Competitions Department's evidence, if the Organising Committee finds a breach of a regulation has occurred it may bring disciplinary proceedings. If it feels there is a case to answer, the party alleged to have committed the breach will be notified within two school working days and given an opportunity to make submissions or to attend a hearing, as determined by the Organising Committee. The National Youth Disciplinary Secretary (NYDS) shall be copied in to all correspondence from the start of the proceedings.
- 17.2 Sanctions open to the Organising Committee in respect of any breach of these Regulations and/or RFU Rules/Regulations and/or World Rugby Rules/Regulations will include, but are not limited to, the following:
- Reprimand an individual or educational establishment;
 - Impose a fine up to £100 and/or an award of reasonable costs to the complainant;
 - Order a replay;
 - Order that the result is that an educational establishment has lost the match;
 - Exclude/disqualify an educational establishment from all or any of the Competitions for such period of time as the Organising Committee may decide.
- 17.3 Such action by the Organising Committee will be recorded and reported to the ERFSU Executive. Any fines and costs imposed and collected will be put towards the costs of the Competition. Failure by an educational establishment to pay a fine or costs will be considered a further breach of these Regulations.

18. Right of Appeal

- 18.1 Should an educational establishment or other party who is involved in the proceedings wish to appeal a decision of the Organising Committee, that party shall have a right to appeal in accordance with this Regulation 18.
- 18.2 Such aggrieved party may, within 72 hours from the receipt of the letter or notice informing it of the Organising Committee's decision, lodge an appeal in writing to the RFU Rugby Events & Competitions Department, who shall then notify the National Schools & Youth Disciplinary Officer (NYDS) and the RFU Head of Discipline. An appeal fee of £100 is payable at the time of lodging the appeal. This may be refunded if the appeal is successful, and if so ordered.
- 18.3 The NYDS, together with the RFU Discipline Department, will direct how the appeal will be heard and conducted and will issue case management directions until a panel is appointed to hear the appeal. Any appeal will normally be determined by written submissions unless the NYDS and RFU Discipline Department consider it appropriate to have a live hearing in which case such hearing will take place as soon as practicable to avoid undue delay to the next round. The decision of the appeal panel is final.

19 Obligations

- 19.1 Each educational establishment entering its team in the Competition agrees:
- 19.1.1 that by commencing its programme of matches in the Competition, it has entered

into a legally binding obligation with the RFU and the ERFSU, and, as a separate covenant, with every other team in the Competition and with any sponsor and/or commercial partner as may be associated with the Competition in which the team plays;

- 19.1.2 to comply in every particular with these Regulations, the RFU Rules/Regulations and the World Rugby Rules/Regulations;
- 19.1.3 to permit access to its premises during a match to any person authorised by the RFU, ERFSU or Organising Committee (with or without notice) to check compliance with all or any of the above Regulations.

Broadcasting & Image Rights

- 19.2 All broadcasting, media and image rights relating to the Competitions belong solely and exclusively to the RFU and the ERFSU, and all participating educational establishments agree not, by any act or omission, to do anything to prejudice, or that is in conflict with, these rights.
- 19.3 In all competition matches, apart from the Quarter-Finals, Semi-Finals and Finals, participating teams may record matches for the purpose of analysis and non-commercial purposes only. Any team wishing to record a match using television or any audio-visual or electronic media must obtain the permission of both participating teams prior to the match. For the avoidance of doubt, no team is permitted to record the Quarter-Final, Semi-Final or the Final matches.
- 19.4 Anyone wishing to broadcast any match by means of radio, television or any other audio-visual or electronic media must obtain permission from the RFU and ERFSU by contacting the RFU Rugby Events & Competitions Department.
- 19.5 No team shall take any part (either as organiser or participant or in any other way) in any match that is in whole or in part broadcast by means of radio, television or any other audio-visual or electronic media, where doing so shall be a breach of any broadcasting, or other, contract entered into by the RFU and ERFSU or any other person acting for or on behalf of itself or any group or association of Clubs, Schools, Constituent Bodies or Unions.

Annex 1

CUP/CHAMPIONS TROPHY STRUCTURE

| | U18 Format | U15 Format |
|---------------|---|---|
| Tier 1 | The 32 team Champions Trophy will become the top tier of U18 competition (Please see separate regulations) | 256 teams will be selected to enter the Cup . Teams will be asked to select their level on entry. The OC will then determine the 256 based on the entries. Final at Twickenham |
| Tier 2 | 128 teams will be selected to enter the Cup . Teams will be asked to select their level on entry. The OC will then determine the 128 based on the entries. Final at Twickenham | Those teams losing in Round 1 of the Cup will drop into the Plate . No Final at Twickenham. |
| Tier 3 | Those teams losing in Round 1 of the Cup will drop into the Plate . No Final at Twickenham. | The remaining teams who enter the tournament will participate in the U15 Vase . Final at Twickenham |
| Tier 4 | The remaining teams who enter the tournament will participate in the U18 Vase . Final at Twickenham | Those teams losing in Round 1 of the Vase will drop into the Bowl . No Final at Twickenham. |
| Tier 5 | Those teams losing in Round 1 of the Vase will drop into the Bowl . No Final at Twickenham. | |

Annex 2

ROUND DATES FOR 2017-18

U18 ROUND DATES FOR 2017/2018

| DATE | CHAMPIONS TROPHY | U18 CUP (128) | U18 PLATE (64) | U18 VASE (256) | U18 BOWL (128) |
|-------------------|------------------|---------------|----------------|----------------|----------------|
| Wed 13 Sept 17 | | | | Round 1 | |
| Wed 27 Sept 17 | Round 1 | Round 1 | | Round 2 | Round 1 |
| Wed 11 Oct 17 | Round 2 | Round 2 | Round 1 | Round 3 | Round 2 |
| Wed 8 Nov 17 | Quarter Finals | Round 3 | Round 2 | Round 4 | Round 3 |
| Wed 22 Nov 17 | Semi Finals | Round 4 | Round 3 | Round 5 | Round 4 |

| | | | | | |
|-------------------|--------------|----------------|----------------|----------------|----------------|
| Wed 6 Dec 17 | Final | Quarter Finals | Quarter Finals | Quarter Finals | Quarter Finals |
| w/c 26 Feb 18 | | Semi Finals | Semi Finals | Semi Finals | Semi Finals |
| Tues 13 Mar 18 | | | Final | | Final |
| Wed 14 Mar 18 | | Final | | Final | |

U15 ROUND DATES FOR 2017/18

| DATE | U15 CUP (256) | U15 PLATE (128) | U15 VASE (256) | U15 BOWL (128) |
|---------------------|------------------|--------------------|-------------------|-------------------|
| Wed 27 Sept 17 | Round 1 | | Round 1 | |
| Wed 11 Oct 17 | Round 2 | Round 1 | Round 2 | Round 1 |
| Wed 15 Nov 17 | Round 3 | Round 2 | Round 3 | Round 2 |
| Wed 29 Nov 17 | Round 4 | Round 3 | Round 4 | Round 3 |
| Wed 17 Jan 18 | Round 5 | Round 4 | Round 5 | Round 4 |
| Wed 31 Jan 18 | Quarter Finals | Quarter Finals | Quarter Finals | Quarter Finals |
| w/e 3 & 4 Mar 18 | Semi Finals | Semi Finals | Semi Finals | Semi Finals |
| Tues 13 Mar 18 | | Final | | Final |
| Wed 14 Mar 18 | Final | | Final | |

a) All rounds to be played in specified weeks.

- b) Flexibility within week as stated but not beyond week ending (Sunday).
- c) Semi-Finals & Finals subject to change.