

To: Joint Steering Committee for Development of RDA

From: Kevin Marsh, ACOC Representative

Subject: Revisions to instructions for production, publication, distribution and manufacture statements (2.7, 2.8, 2.9, 2.10)

ACOC thanks LC for this proposal to revise the instructions within 2.7 Production Statement, 2.8 (Publication Statement), 2.9 (Distribution Statement), and 2.10 (Manufacturing Statement).

ACOC generally supports the proposed changes, including the addition of instructions for recording statements that contain grammatically inseparable information belonging to another element, moving the Optional Omission for omitting levels of corporate hierarchy, the removal of conditions and first optional addition for recording manufacture statements, and revisions to instructions for recording statements of function.

However, ACOC has concerns with part of the proposed changes to 2.7.4.3, 2.8.4.3, 2.9.4.3, and 2.10.4.3. Given that part of the rationale for these changes is to clear up confusion between transcribed elements and Group 2 elements associated with a manifestation, we do not consider the text used in the proposed revisions to 2.7.4.3, 2.8.4.3, 2.9.4.3, and 2.10.4.3 adequately expresses the distinction, and actually runs the risk of introducing greater confusion.

ACOC does not have alternative wording to offer, but considers that minor alteration to some of the proposed wording would serve to clarify the instructions.