

**To:** Joint Steering Committee for Development of RDA  
**From:** Kathy Glennan, ALA Representative to the JSC  
**Subject:** Revisions to instructions for production, publication, distribution and manufacture statements (2.7, 2.8, 2.9, 2.10)

ALA thanks LC for this proposal. We generally agree with the intent but offer the following suggestions and comments.

***Changes #1-#4:***

**General comments:** As written, the proposed language addresses any other element; it is not restricted to elements related to production, publication, distribution or manufacture. We believe this needs a clearer definition of scope. For example, is this revision intended to cover a publisher named in the title? Although the proposal is not specific on this point, we suspect a narrower interpretation is intended, limiting the scope to elements that fall into RDA 2.7-2.10. Our comments below reflect this assumption.

We also believe that the instructions in RDA 2.8-2.10 should be applied in the order written, and this proposal does not change that understanding. Thus, we recommend making it clear that inseparable information be recorded with the earliest applicable element, regardless of the order that the information appears on the resource. Thus a statement such as “Engraved, printed, manufactured and published by G.W. & C.B. Colton & Co.” [OCLC #52562402] would be recorded as part of the publication statement.

***Change #1:***

**Add instruction about inseparable information to 2.7.1.4:** Disagree.

We wonder if this is truly applicable to production statements and thus question the proposed change. If this change is really needed, an example would be helpful. In addition, if this change is accepted, we recommend a modification to the conditional clause similar to what we suggest under Change #2 below.

**Move optional omission to 2.7.4.3:** Accept.

**Make a reference to 21.2:** Disagree.

We are not convinced that a reference to these instructions will clarify anything; in fact, it might be more confusing. RDA does not currently contain references to Chapters 18-22 from any instruction in Chapter 2.

***Change #2:***

**Add first sentence to improve readability and consistency:** Agree.

**Add instruction about inseparable information to 2.8.1.4:** Agree conceptually; suggest revisions.

For grammatically inseparable information, the proposed instructions say to “transcribe the information in the order found.” The proposal does not go on to state where to transcribe the inseparable information (i.e., which element). We wonder if the instructions should be modeled after RDA 2.5.2.6 (Designation of Edition Integral to Title Proper, Etc.), which not only specifies in which element to enter the edition information, but also what to put in the edition element under those circumstances (nothing).

Thus, we suggest the following replacement wording for the proposed conditional instruction in 2.8.1.4, based on our assumption that this proposal as a whole is intended only to address a mixture of publication, distribution, and manufacture elements:

*If.* The publication statement contains information ~~belonging to another element~~ relating to the distribution or manufacture of the resource  
*and* the information is not grammatically separable, or its transposition would result in an ambiguous or otherwise confusing construction  
*then:* transcribe the information in the order found as part of the publication statement. Do not record the distribution or manufacture information in a separate element.

**Move optional omission to 2.8.4.3:** Agree.

**Make a reference to 21.3:** Disagree.

For our rationale, see comments under Change #1.

**Change #3:**

**Add first sentence to improve readability and consistency:** Agree.

**Add instruction about inseparable information to 2.9.1.4:** Agree conceptually; suggest revisions.

We suggest similar changes to the wording of the conditional clause here, related to those detailed under Change #2 above. Our revision here only adds the manufacture elements to the instruction, based on our assumption that this proposal as a whole is intended only to address a mixture of publication, distribution, and manufacture elements. It also assumes a linear reading of RDA 2.8-2.10.

*If.* The distribution statement contains information ~~belonging to another element~~ relating to the manufacture of the resource  
*and*

the information is not grammatically separable, or its transposition would result in an ambiguous or otherwise confusing construction

*then:*

transcribe the information in the order found as part of the distribution statement. Do not record the manufacture information in a separate element.

**Move optional omission to 2.9.4.3:** Agree.

**Make a reference to 21.4:** Disagree.

For our rationale, see comments under Change #1.

*Change #4:*

**Modify first sentence to improve readability and consistency:** Agree.

**Remove conditions and first optional addition in 2.10.1.4:** Agree.

**Add instruction about inseparable information in 2.10.1.4:** Disagree.

Based on our assumption that this proposal as a whole is intended only to address a mixture of publication, distribution, and manufacture elements, we do not recommend adding this instruction. Our recommendation here assumes a linear reading of RDA 2.8-2.10.

**Move optional omission to 2.10.4.3:** Agree.

**Make a reference to 21.5:** Disagree.

For our rationale, see comments under Change #1.

*Changes #5-#12:*

Agree.