

To: Joint Steering Committee for Development of RDA

From: Bill Leonard, CCC representative

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

CCC agrees with the general intention of the proposal to provide guidance in the recording of complex statements and we acknowledge the comments given in the ALA and ACOC responses. CCC's specific comments are listed below in each group of changes.

In general, CCC remains unclear whether these changes will assist when, for instance, the place of publication is grammatically inseparable from a publisher's name.

Concerning the instructions that refer from chapter 2 to chapter 21, CCC has some suggested wording to clarify that we are recording the relationship to the publisher, producer, manufacturer or distributor.

We also note that the word "relationship" could be inserted into instruction and chapter titles in many places in chapters 19, 20, 21 and 22 to help improve clarity.

Change 1. Add instruction about inseparable information to 2.7.1.4

CCC disagrees with the change to 2.7.1.4. CCC views it as unnecessary as the production statement is the only statement applicable to unpublished resources, the following three statements all apply to published resources only.

Move optional omission to 2.7.4.3

CCC agrees.

Make a reference to 21.2

We suggest the wording of the reference to be added to 2.7.4.3 should reflect the function of Chapter 21: For instructions on recording the relationship to the producer of an unpublished resource, see 21.2.

Change 2. Add sentence to 2.8.1.4.

CCC agrees with the addition to the instruction and the addition of the first example. We note that the second example is probably mis-placed. The Impensis Orphonatrophei Baruthini example illustrates the nature of publishing for early printed books where the printer is also the publisher. This example and its explanation could be moved to 2.8.4.4.

Add instruction about inseparable information to 2.8.1.4

CCC agrees with ALA's counter-proposal

Move the optional omission to 2.8.4.3

CCC agrees.

Make a reference to 21.3

We suggest the wording of the reference to be added to 2.8.4.3 should reflect the function of chapter 21: For instructions on recording the relationship to the publisher of a resource, see 21.3.

Change 3. Add sentence to 2.9.1.4

CCC agrees that a sentence should be added, but would prefer to modify the resources mentioned as examples of distribution statements to reflect the types of resources which frequently include such statements. In particular, we would substitute a video or audio recording instead of listing an online resource. Online resources seldom have distribution statements.

Add instruction about inseparable information to 2.8.1.4

CCC agrees with ALA's counter-proposal.

Move the optional omission to 2.9.4.3

CCC agrees.

Make a reference to 21.4

We suggest the wording of the reference to be added to 2.8.4.3 should reflect the function of chapter 21: For instructions on recording the relationship to the distributor of a resource, see 21.4.

Change 4. Revise first sentence for readability and consistency

CCC agrees that examples of resources should be included, but would prefer to modify the resources mentioned as examples of manufacture statements to reflect the types of resources which frequently include such statements. In particular, we would substitute a video or audio recording instead of listing an online resource. Online resources do not normally have manufacture statements.

Remove conditions and first optional addition in 2.10.1.4

CCC agrees.

Add instruction about inseparable information in 2.10.1.4

CCC agrees with ALA's argument that this instruction should not be necessary assuming a linear reading of 2.8 to 2.10.

Move the optional omission to 2.10.4.3

CCC agrees.

Make a reference to 21.5

We suggest the wording of the reference to be added to 2.10.4.3 should reflect the function of chapter 21: For instructions on recording the relationship to the manufacturer of a resource, see 21.5.

Changes 5, 6, 7, 8.

CCC disagrees with these changes. A characterizing word or phrase is defined in chapter 9 as a name so it does not need to be repeated here. The other change is conflating the name and the state of function. Recording statements of function which appear in conjunction with the names is already indicated in 2.7.4.4, 2.8.4.4, 2.9.4.4 and 2.10.4.4.

If these changes are ultimately approved by JSC, CCC would prefer the addition of see references to 9.2.2.25 (characterizing words or phrases as names) and to 2.7.4.4, 2.8.4.4, 2.9.4.4 and 2.10.4.4 (statements of function) from 2.7.4.1, 2.8.4.1, 2.9.4.1 and 2.10.4.1.

Changes 9, 10, 11, 12. CCC sees the value of these changes in some situations, but we prefer the transcribed statements of function to be optional additions. In the case of self-published materials, this

could result in superfluous and repetitive data. We counter-propose that the text suggested by LC be added below the existing "Optional Addition" header.