

To: Joint Steering Committee for Development of RDA
From: Kathy Glennan, ALA Representative to the JSC
Subject: Addition of the Copyright holder relationship – Amendments to RDA 21.6.1.1 and Appendix I

ALA thanks ACOC for putting forward a proposal to address the copyright holder relationship. While we conceptually support the addition of a relationship designator for copyright holder, we do not agree with its proposed placement in Appendix I, nor do we support the proposed change to 21.6.1.1.

ALA believes that a copyright holder has a relationship at the work or expression level, rather than at the manifestation level. Section 102(a) of the United States Copyright Law states:

“Copyright protection subsists, in accordance with this title, in original works of authorship fixed in any tangible medium of expression, now known or later developed, from which they can be perceived, reproduced, or otherwise communicated, either directly or with the aid of a machine or device.”

We assume that copyright laws outside of the U.S. also have a similar scope.

Thus, we consider that it would be more appropriate to add the copyright holder relationship to either Chapter 19 or Chapter 20, or possibly both. Such an approach could include:

- Modifying 19.3.1 (Basic Instructions on Recording Other Persons, Families, and Corporate Bodies Associated with a Work)
- Adding a new instruction at 20.3, which would address Other Persons, Families, and Corporate Bodies Associated with an Expression (since copyright holders are not contributors). This would have an impact on the earlier parts of chapter 20 as well.
- Defining a relationship designator at I.2.2 (Relationship Designators for Other Persons, Families, or Corporate Bodies Associated with a Work)
- Defining a relationship designator in a new section of I.3, as I.3.2 (Relationship Designators for Other Persons, Families, or Corporate Bodies Associated with an Expression)