

To: Joint Steering Committee for Development of RDA
From: Kevin Marsh, ACOC Representative
Subject: Revision of RDA 2.11.1.3 (Recording Copyright Dates)

ACOC agrees with ALA that this instruction is problematic for all resources with multiple dates associated with different parts of the content. We also agree that the ability to give the other dates in a note, rather than in a separate occurrence of the element, is not sufficient to meet the needs of users.

However, we do not support this proposal as it currently stands, i.e. through adding an optional addition applicable only to audio recordings.

In the longer term, we consider that it is desirable to find a solution which allows for the recording of multiple copyright dates for all mixed content resources in an element. Such a solution would also require that the copyright date could be explicitly associated with the content to which it is applicable. In the context of an environment where rights management is of increasing importance, we would welcome a proposal which addressed this issue more holistically.

In the short term, ACOC would prefer a simpler solution than that proposed, i.e. the addition of the sentence indicated to the paragraph dealing with multiple dates, as follows:

If the resource has multiple copyright dates that apply to various aspects (e.g., text, sound, graphics), record only the latest copyright date. If a resource has both a copyright date and a phonograph date, record both.

This would meet our immediate need to distinguish between the copyright held in sound and copyright held in other content, without the inconsistency and need for institutional policy decisions that would result from introducing an optional addition.