

**To:** Joint Steering Committee for Development of RDA

**From:** Bill Leonard, CCC representative

**Subject:** **Variant title as access point (RDA 6.27.4.1, 6.28.4.1, 6.39.3.1, 6.30.5.1, 6.31.3.1)**

CCC thanks ALA for developing this proposal. We support the general intention of encouraging the creation of variant access points but we wish to note that this instruction is relevant mainly to the construction of a browseable index. We also note that local system capabilities must be taken into consideration before individuals decide to implement these changes. Many of us are used to working on systems that automatically index the title portion of name/title headings in the title index. Our systems require us to build the name and title portions separately before combining them to form the name/title string. In this situation, adding yet another variant title access point would be redundant.

We also wish to point out an unintentional typographical error that may have been caused by differences in character sets during copying and pasting. In Section 3 of the proposal, the word “arrests” should be replaced by the French word “arrêts” in all cases.