

To: Joint Steering Committee for Development of RDA  
From: Susanne Oehlschläger, DNB Representative  
Subject: Subject Relationship Element in RDA Chapter 23

DNB thanks ALA for this proposal. In general, we agree with the proposal and have the following comments:

- Subject as a core element:

We fully agree in the wording on page 3 "Retain Subject as a core element. The subject relationship is an essential part of a full description, and ALA wishes to endorse its importance. However, the description of a work should not be an invalid RDA description simply because it did not include any subject relationship element. This would make invalid many records that otherwise follow RDA." But it seems to us that this consideration is not covered by the proposed changes. Maybe, a note could be added indicating that also records without a subject element are considered to be RDA conform records.

- Use of controlled vocabularies

We welcome the priority of controlled languages and cataloguing systems however we also see the danger that the proposed wording could lead to a limitation and a much too static focus on the conventional cataloguing. We do not want to be obliged to do minimal subject cataloguing only to produce RDA-conform records. Unfortunately, there is no evidence that indicates the possibility to use non-controlled vocabulary, too. We think this option should also be possible (at least, by means of a note at 24.4.1.3).

- Relationship designators

We are not sure whether the two proposed relationship designators "depiction of" and "set in" are useful as the selection seems arbitrary. ALA's proposal already notes "that the specific types of relationship will most often be specified by the authoritative subject system being used". Therefore we wonder whether these two relationship designators are needed in RDA at all.