

To: Joint Steering Committee for Development of RDA

From: Bill Leonard, CCC representative

Subject: **Revision of RDA 2.12.8 and 2.12.16, regarding recording ISSNs**

CCC has reviewed 6JSC/ALA/7 and supports the proposed revision of RDA 2.12.8 and 2.12.16. We recognize the importance of identifiers for identification and collocation but we do note a theoretical concern with these changes. The ISSN of Series and ISSN of Subseries are subelements of the series statement and are attributes of the manifestation. ISSNs not present on the resource identify a related work, not the manifestation that is related to the series. It is appropriate to employ those identifiers in the relationship to the work, not in the series statement. We note that the preferred sources of information for some other subelements of the series statement are also limited to the resource (e.g., Numbering within Series).