ACOC thanks the ALA Representative for preparing this discussion paper on the treatment of Subjects in RDA. We note that 6JSC/ALA/Discussion/2 addresses similar issues as 6JSC/Chair/8 - but seeks to resolve these issues in a very different way.

6JSC/ALA/Discussion/2 proceeds along the path of opening up discussion around pursuing a revision in accordance with FRSA&D’s articulation. 6JSC/Chair/8’s proposal proceeds along the path of revising RDA in accordance with (but as an extension of) FRBR’s articulation of Group 3 entities.

In going back over LC rep/3 and responses, ACOC cannot see that the concerns raised by the other constituencies (including ourselves) - particularly those around the JSC extending the FR model within RDA prior to FRBR Review Group completing its work – were resolved.

The FRBR Review Group reports that its work is still underway (see http://www.ifla.org/files/assets/cataloguing/frbrrg/activities_2012-13.pdf).

This being the case ACOC considers it premature to provide a detailed response to each of the 11 recommendations provided within 6JSC/ALA/Discussion/2, and seeks further discussion of the preferred approach to the treatment of Subjects in RDA at the November meeting.

One of the issues ACOC would like to flag for discussion is the choice of terminology. Replacing “Thema” and “Nomen” by the terms “Subject” and “Name of Subject” is not as straightforward as it may appear, and may undervalue the reason for introducing these terms within FRSA&D in the first place (see FRSA&D 3.3 Choice of Terms for FRSA&D Entities, Appendix B.2.2 Name and Nomen, and Appendix C.1 The Importance of the THEMA-NOMEN Model).