ACOC thanks ALA for providing this discussion paper on issues around the use of structured and unstructured descriptions to record a relationship. We agree that the lack of instructions for creating structured and unstructured descriptions is problematic.

**General comments**

ACOC has concerns about the methodology that appears to have been used to inform the preparation of the strawman proposal. ACOC does not feel that it is appropriate to use the existing examples of structured and unstructured description in RDA to inform discussion of possible instructions. In our opinion, the starting point of this discussion should be consideration of the purpose of the structured and unstructured description in relation to expressing relationships. We feel that discussion at the broader level would usefully serve to inform the development of appropriate instructions. Following such discussion and development of instructions, the existing examples should then be reviewed to ensure they properly exemplify the instructions.

The instructions in RDA at 24.4 indicate that description of the related work, expression, manifestation, or item (either structured or unstructured) may be used in two ways;

1. To record the relationship, as an alternative to identifier or authorized access point
2. As an adjunct to identifier or authorized access point

ACOC suggests that these two different uses should be teased out. Clarity regarding these uses would inform the development of more detailed instructions on structured and unstructured descriptions.

**Comments on Tentative Recommendations**

1. ACOC agrees that more guidance is required for cataloguers in recording relationships as descriptions, but it is not appropriate to specify details of where these instructions should go until the broader issues outlined above are addressed.

2. While a structured description may be made of appropriate elements defined elsewhere in RDA, ACOC does not believe that the composite description constitutes an element.

3. We are unsure what is being recommended here. According to Chapter 24.4, the relationship is recorded *first* (using identifier, authorised access point, and/or description) and the relationship designator is *then added* as a separate element. Therefore, when considering instructions for recording the relationship, relationship designators should not be included at this point.

   If, however, this is a broader recommendation to make relationships designators core, this needs to be considered as a separate issue.
4. ACOC are inclined to agree with the LC response on this point, and would welcome further exploration of both suggestions outlined in the background to the LC response.

5. Our preference would be to create instructions that are broadly applicable to a range of related entities, instead of creating specific instructions for particular situations. Perhaps resolution of the broader issues outlined in our general comments above will inform how to approach this.

6 & 7. While we agree that the current lack of instructions for contents notes and accompanying material statements is problematic, the details of how these and other more specific instructions should be written would be better left until the broader issues relating to structured and unstructured descriptions have been addressed. However, we would be happy for the suggestions made by LC to be explored in the meantime. It may also be appropriate for libraries to adopt a similar approach to LC and set institutional policies to guide cataloguers until appropriate instructions can be drafted for RDA as a whole.