TO: Joint Steering Committee for Development of RDA

FROM: Alan Danskin, British Library representative to JSC

SUBJECT: Revisions to instructions for production, publication, distribution and manufacture statements (2.7, 2.8, 2.9, 2.10). British Library Response.

The British Library thanks LC for their proposals to simplify and clarify the application of these instructions.

We support the intention of the proposed changes, detailed comments on the specific changes are listed below.

With regard to changes 5-8, we are concerned that the change of scope for each of the name sub-elements contradicts the definition of the sub-element. Term characterizing the publisher name, are not the same as the publisher’s name – which may also be known. We have suggested some wording to mitigate this, but is this sufficient, or should the definitions and element names also be amended?

**Change #1**: Add instruction to 2.7.1.4 about recording statements containing inseparable information belonging to another element. Move the optional omission for levels of corporate hierarchy from 2.7.1.4 to 2.7.4.3. Add a reference at 2.7.4.3 to 21.2 for the producer of an unpublished resource.

**Agree**. We suggest the addition of examples at 2.7.1.4 (as provided at 2.8.1.4).

**Change #2**: Add instruction to 2.8.1.4 about recording a publication statement to improve readability and consistency. Add instruction about recording statements containing inseparable information belonging to another element. Move the optional omission for levels of corporate hierarchy from 2.8.1.4 to 2.8.4.3. Add a reference at 2.8.4.3 to 21.3 for the publisher.

**Agree**.
**Change #3:** Add instruction to 2.9.1.4 about recording a distribution statement to improve readability and consistency. Add instruction about recording statements containing inseparable information belonging to another element. Move the optional omission for levels of corporate hierarchy from 2.9.1.4 to 2.9.4.3. Add a reference at 2.9.4.3 to 21.4 for the distributor.

**Agree.** We suggest the addition of examples at 2.9.1.4 (as provided at 2.8.1.4).

**Change #4:** In 2.10.1.4, remove conditions and first optional addition for recording manufacture statements so that recording the manufacture statement is the basic instruction. Add instruction about recording statements containing inseparable information belonging to another element. Move the optional omission for levels of corporate hierarchy from 2.10.1.4 to 2.10.4.3. Add a reference at 2.10.4.3 to 21.5 for the manufacturer.

**Agree.** We suggest the addition of examples at 2.10.1.4 (as provided at 2.8.1.4).

**Change #5:** Expand scope statement at 2.7.4.1.

We suggest a slight change to the wording:

“A producer's name may be represented by a characterizing word or phrase.”

**Change #6:** Expand scope statement at 2.8.4.1.

We suggest a slight change to the wording:

“A publisher’s name may be represented by a characterizing word or phrase.”

**Change #7:** Expand scope statement at 2.9.4.1.

We suggest a slight change to the wording:

“A distributor’s name may be represented by a characterizing word or phrase.”

**Change #8:** Expand scope statement at 2.10.4.1.
We suggest a slight change to the wording:

“A manufacturer’s name may be represented by a characterizing word or phrase.”

Change #9: Add instruction at 2.7.4.4 for recording statements of function with no name

Agree, but we propose a change to proposed wording to clarify the intention

“Record a statement of function as it appears on the source of information even if no a person, family, or corporate body is only named represented in that statement by means of a characterising word or phrase.”

Change #10: At 2.8.4.4, delete restriction on recording statement of function and add instruction for recording statements of function with no name.

Agree with the change, but we would prefer to see the exclusion retained as an optional omission to avoid redundant work.

Record words or phrases indicating the function (other than solely publishing) performed by a person, family, or corporate body as they appear on the source of information.

EXAMPLE
SAGE Publications on behalf of McGill University
Source of information reads: Published by SAGE Publications on behalf of McGill University
Published by SAGE Publications on behalf of McGill University

[2nd example omitted]

Optional Omission

Omit the word or phrase indicating the function if it relates solely to publishing.

EXAMPLE
Record a statement of function as it appears on the source of information even a person, family, or corporate body is only represented by means of a characterising word or phrase

EXAMPLE
published by the author
Privately published by the estate

Change #11: Add instruction at 2.9.4.4 for recording statements of function with no name.

Agree

Change #12: Add instruction at 2.10.4.4 for recording statements of function with no name.

Agree