To: Joint Steering Committee for Development of RDA  
From: Christine Frodl, DNB Representative  
Subject: Revisions to instructions for production, publication, distribution and manufacture statements (2.7, 2.8, 2.9, 2.10)  

DNB thanks LC for this proposal. We agree with the proposal and have the following amendments:

**Change 1:** We recommend placing the sentence at 2.7.1.4 /2.8.1.4 /2.9.1.4 / 2.10.1.4 „Transcribe places of production and producer’s names as they appear on the source of information (see 1.7 RDA)“ at the beginning of the instruction at RDA 2.7.1.4.

2.7.4.3 Recording Producers’ Names: We propose a slightly reworded instruction: For instructions on recording the relationship of a producer of an unpublished resource as a person, family, and corporate body associated with a manifestation, see 21.2.

**Change 2:**

The example

Impensis Orphonatrophei Baruthini

*Printer treated as publisher for an early printed resource*

should be deleted, because the orphanage is not the printer, it is the publisher.  
(German translation of the Latin text: “auf Kosten des Bayreuther Waisenhauses” = publisher).  
(English translation of the Latin text: “at the expense of the Bayreuth orphanage” = publisher).

We would also recommend to delete the sentence “For instructions on recording the publisher, see 21.3”, because it refers to a relationship.

**Change 10:**

For reasons of clarity in brief lists of titles and the reduction of efforts we would like to keep the sentence in parenthesis “other than solely publishing”. Exception: For early printed resources, record words or phrases indicating the function performed by a person, family, or corporate body as they appear on the source of information.
Question regarding the example:

- Published by the author
- Privately published by the estate

Is there a reason for the different capitalization?

We note that in Appendix A there is no rule to capitalize these words (as there was in AACR2 A.7B1). ISBD 4.2.5 does also not call for capitalization at this place.

**General remark:**

The discussion within the German expert group on cataloguing has shown different positions to the changes suggested in this proposal. The group would welcome, if the JSC Examples Group would provide examples to each instruction.