

To: Joint Steering Committee for Development of RDA
From: Bill Leonard, CCC representative
Subject: **Addition of the Copyright holder relationship – amendments to RDA 21.6.1.1 and Appendix I**

CCC thanks ACOC for preparing this proposal but regrets that we cannot support it.

CCC's main concern is that recording intellectual property information is outside the scope of RDA according to RDA 0.3.3.

"Attributes and relationships currently out of scope. The following attributes and relationships are currently out of scope:
attributes and **relationships** (associated with the entities person, family, corporate body, work, and expression) whose primary function is **to support user tasks related to rights management.**"

On a theoretical note, CCC asserts that it is not always clear as to which FRBR Group 1 entity the copyright holder should be related to. There are cases where the rights are to the work, others to the expression and others to the manifestation. Also, the current discussions of aggregates in the context of a current JSC discussion paper, raise the possibility that there could be multiple copyright holders associated with a particular manifestation. In general, a relationship designator as suggested in the ACOC proposal cannot adequately represent the complexity of intellectual property rights. We suggest this remain the realm of organizations representing the rights of creators and contributors.