**To:** Joint Steering Committee for the Development of RDA

From: Ebe Kartus, ACOC Representative

Subject: Clarifying core element status for "not identified" elements in the

Distribution and Manufacture Statements (RDA 2.9 and 2.10)

ACOC thanks ALA for preparing this proposal to clarify instructions for "not identified" elements in Distribution and Manufacture Statements.

ACOC supports the proposal, but is concerned that application of the alternatives to omit unknown distribution and manufacture elements may lead to descriptions that lack a PPDMS. Although the alternatives to omit unknown distribution and manufacture elements in lieu of recording "[XXX] not identified" would be valid when publication elements are present in the description, it is possible that cataloguers may not recognize the requirement to record "[XXX] not identified" in distribution and manufacture statements when publication elements are not present in a description. That is, faced with the alternative to omit distribution and manufacture elements that are not readily ascertainable, cataloguers may fail to remember the conditionally core status of these elements. ACOC would like the proposed revisions to include clarification that alternatives may not be applied if the publication element is lacking.

ACOC also recognizes that the proposal may be influenced by discussion arising from 6JSC/BL rep/1.