To: Joint Steering Committee for Development of RDA

From: Ebe Kartus, ACOC Representative

Subject: Creating instructions for using nominative case for titles (RDA 6.2), names (RDA 8.5),

and places (RDA 16.2)

ACOC thanks ALA for this proposal to codify existing practice with regard to case.

ACOC supports the proposal and offer the following suggestions.

- 1. In the proposed text of 6.2.1.11 we question whether the wording "unless the title is to be accessed under a different case" offers sufficient guidance as to the circumstances in which this condition might apply. At this stage, however, we are unable to suggest alternative wording.
- 2. We believe that the revision to the instructions would benefit from an additional amendment to cover circumstances in which a title, name or place differs from the dictionary form, but the difference is not caused by a change in case or other inflection. This might apply, for example, to changes caused by Welsh mutations, and we would welcome particularly input from the British Library and CILIP on this point.