To: Joint Steering Committee for Development of RDA

From: Ebe Kartus, ACOC Representative

Subject: Simplification of RDA 2.7-2.10

ACOC thanks the British Library Representative for this discussion paper.

ACOC supports both of the aims of the paper: to explore options for simplifying the instructions at 2.7-2.10, and to provide better support for the FRBR user task FIND in the context of sets of resources issued within a given timeframe or at a specified place. We would welcome further work in this area, and suggest that for conceptual clarity this might take the form of separate proposals covering each of the two major issues identified.

Our responses to the specific questions raised are given below.

1. While recognising that Scenario B provides the greater scope for simplification, ACOC prefers Scenario A as it maintains PPDM as separate elements.

2. Our preference is for further exploration of the attribute option. We have some reservations about Place, however, as we do not find the use case compelling. "Timespan" seems problematic as a term as it implies this would always be a range rather than a specific date.

3. We accept the argument of 6JSC/ALA/Discussion/4 that Production needs to be treated differently from Publication, Distribution and Manufacture.

4. We believe the question of simplifying Edition Statement and Series Statement should be deferred until the approach to simplifying PPDM has been resolved.

5. We see no in-principle difficulty in defining element sub-types differently if the instructions are the same for each sub-type. They are logically distinct even if the instructions are identical. If this approach were taken for Date of Manifestation, it could also be applied to Place.

6. If Scenario B was adopted for simplification we believe that the term "Issuance Statement" is not appropriate, partly for the reason noted that if JSC agrees that unpublished and found objects are in scope "issuance" is not an appropriate term, and partly as this would likely cause confusion with the term "Mode of Issuance" used in a different context. We do not see any difficult with calling this a "statement", however.

ACOC supports the Recommendations in the paper to liaise with other groups about the resulting proposals.