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

**From:** Kevin Marsh, ACOC Representative

**Subject:** Revisions to Change of Name of Jurisdiction or Locality (RDA 11.3.3.4)

ACOC thanks LC for this proposal to revise the instruction at RDA 11.3.3.4 to provide the opportunity to ensure that earlier forms of names of jurisdictions or localities are preserved in the current environment.

We support the proposed revision.

ACOC notes that if the earlier forms are also recorded it may mean the instruction on constructing an access point at RDA 11.13.1.3 needs to specify that the latest form should be used.

We also note that the encoding schema for achieving this may vary between agencies, and this variance may extend further in the future. Although the LC proposal details how both forms can be treated in MARC21 it omits the necessary revisions to RDA which would allow that data (i.e., the dates when the other name was applicable) to be recorded.