To: Joint Steering Committee for Development of RDA

From: John Attig, ALA Representative

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

ALA thanks the Library of Congress for this proposal to allow earlier forms of the name of a place to be recorded as Place Associated with the Corporate Body. While we believe that these should ultimately be treated as sequential relationships between instances of the Place element, we do not oppose adding this instruction so that "earlier forms may be preserved *in the current environment*" [emphasis added]. However, we suggest that the additional instruction be presented as an *Optional Addition*, rather than as a part of the basic instruction

ALA notes that the question raised by ACOC about whether the instructions on constructing authorized access points (11.13.1.3) also need to be changed. We agree that only the latest form of name in use during the lifetime of the body should be added. If the addition to 11.3.3.4 is presented as an *Optional Addition*, it may be sufficiently clear which name is to be added to the authorized access point. However, we believe that it may be preferable to make this explicit at 11.13.1.3.

ALA also notes that ACOC once again raises the issue of the absence in RDA of instructions relating to data about data. ALA continues to believe that this is something that RDA needs to address (rather than leaving it to the tender mercies of the encoding standard). Although this is much too large an issue to deal with in the context of this particular proposal, we would like to see further discussion of the "data about data" issue.