To: Joint Steering Committee for Development of RDA

From: Ebe Kartus, ACOC Representative

Subject: Additional instructions in Chapter 27 for Structured Descriptions of the "Contained in" and "Container of" Relationships

ACOC thanks ALA for this proposal to provide explicit instructions for recording contents notes and a structure for describing relationships.

ACOC supports change 1 but does not support the rest of the proposal. Specific comments on suggested changes are outlined below.

Change #1: Revisions to 24.4
ACOC supports the separation of instructions for structured and unstructured descriptions and all proposed revisions to 24.4.

Change #2: Revisions to 25.1
As does the Library of Congress in their response to 6JSC/ALA/41 conclusion 9, ACOC questions the utility of repeating 24.4 general guidelines in Chapter 25-28.

Pending discussion and/or proposals from the Relationship Designators Working Group, we are unable to support any instruction to use a term outside the relationship designators list.

Change #3: Revisions to 26.1
As with Change #2 (Revisions to 25.1), ACOC is unsure of the usefulness of repeating 24.4 general guidelines in 26.1.

ACOC is unable to support instructions to use relationship terms outside of the relationship designators list before discussions or proposals from the Relationship Designators Working Group.

Change #4: Revisions to 27.1
With reference to 6JSC/AggregatesWG/1, ACOC would like to argue that "contained in"/"container of" relationship designators are not always most effectively conveyed as related manifestations. While it may be easier for RDA practitioners to treat all contained in/container of relationships as manifestation-level relationships, the work of the Aggregates Working Group demonstrates that at least some forms of "contained in"/"container of" relationships are *not* manifestation-level relationships. ACOC believes that casting all "contained in"/"container of" relationships as relationships between manifestations is an undesirable simplification of the FRBR underpinnings of RDA.

Further, ACOC believes that including expression-level elements in descriptions of related manifestations (as in the examples at the proposed 27.1.1.3.2.2) warrants further discussion within the community. Recommendation 3 of 6JSC/TechnicalWG/6 has direct implications for ALA's proposal to include expression-level elements in a description of a related manifestation. It is the Technical Working Group's recommendation that structured descriptions of a related WEMI entity be confined to elements appropriate to the entity.

Our reservations toward Changes #2 and #3 also apply to Change #4.

Change #5: Revisions to 28.1
See above responses to Changes #2 and #3.