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

From: Ebe Kartus, ACOC Representative

**Subject:** Referential relationships: RDA Chapter 24-28 and Appendix J

ACOC thanks ALA for this proposal to revise Chapters 24-28 and add new relationship designators to Appendix J. ACOC recognises the issues that the proposal seeks to resolve and agrees that the FRBR model supports cross-entity relationships between WEMI.

However, ACOC also recognises that the changes proposed by 6JSC/ALA/45 substantially rely upon an expanded definition of related WEMI to allow for cross-entity relationships. ACOC firmly believes that cross-entity relationships fall under the purview of the Relationship Designators Working Group (Task 1.2).

Pending future discussions or proposals from the Relationship Designators Working Group, ACOC is unable to support this proposal.