To: Joint Steering Committee for Development of RDA

From: Bill Leonard, CCC representative

Subject: 2.7 Production Statement: changing method of recording

CCC thanks the British Library for continuing the discussion of the issues specific to production statements. CCC does not support the changes as proposed at this time.

While being sympathetic to the advantages of recording, instead of transcribing, production statements for some materials, we have other concerns about the changes in this proposal.

- 1. This creates a specialized practice for one category of material. For the publication, distribution and manufacture statements, we transcribe what is found on the resource. When a correction or explanation is required, that is given in a note. This proposal proposes the reverse for unpublished material, creating confusion for practitioners.
- 2. The proposal undoes principles that have gone a long way to bringing together descriptive practices for libraries and archives.

Looking beyond RDA, one finds that the FRBRoo model makes a distinction between a manifestation singleton and a manifestation product type. Looking forward, one sees a potential impact of the prospective FRBR LRM in providing a comprehensive solution for production, publication, manifestation and distribution statements.