

TO: Joint Steering Committee for Revision of AACR

FROM: Hugh Taylor, CILIP representative

SUBJECT: AACR3 – Part 1 – Constituency Review of December 2004 Draft

In addition to the comments incorporated – sometimes more easily than others – into the template provided, CILIP members noted a number of more general points during their discussions on the draft which are noted here.

CILIP has observed that the draft, and the process leading to its appearance, have provoked considerable comment from the community. It agrees that it is impossible for those who might wish to participate in some way to do so without having access to the draft. At the same time, CILIP is conscious of the difficulties that a more open process would bring in terms of the analysis of comments. In that regard, the current “representative democracy” that characterises the review process is a more appropriate model than a “participatory democracy”. What the remainder of the development of AACR3 perhaps needs, though, is wider consultation in advance on the principles on which the new rules are founded and greater input from the community into the shaping of those rules.

The weight of reactions observed – principally, it should be noted, outside our own constituency – might seem to suggest that there is no way the current process can go forward. However, CILIP would urge JSC to consider how fundamental the objections are, and whether the points they raise can be accommodated within the present structure. CILIP is only too conscious that the new edition has to maintain some degree of continuity; it cannot simply overturn or ignore what’s gone before. Evolution has to be at the heart of the process, not revolution.

AACR3 needs introducing and presenting in simpler language. The terminology, although generally consistent, requires either a greater understanding of the specific (often technical) meanings assigned to words and phrases or more frequent recourse to the Glossary.

At the practical level, future users – even if they cannot be a direct part of the revision process – need to be able to see and understand how the rules are intended to “work” for them, to develop a feel for how they would come to use those rules in their day-to-day workflow. We commend to the Outreach Group the need for some form of outline “practitioner’s” view of the rules to facilitate a practical understanding of the objectives of the new edition.

Amongst the various “views” of the new edition that might in due course be published, CILIP would particularly commend the inclusion of more examples using images – reproductions of title pages, screen shots of OPACs, and the like – in the way utilised by, amongst others, the *CONSER Cataloging Manual*

Review of future parts would be facilitated if a transition table mapping AACR2 rules against AACR3 equivalents were to be provided.

A few of the issues raised in this response are unrelated to any changes the draft introduces and, technically, are comments on AACR2 and not on the draft per se. CILIP would be happy to

follow standard “revision proposal” procedures should JSC agree that changes to AACR in respect of these points are desirable.

AACR3 – Part I

Comments on the December 2004 Draft

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Date: 28 March 2005

Note: The chapter designators (A1, A2, A3, B1, etc.) in the draft of part I have been used in order to differentiate chapter and rule numbers for the new edition from those used in AACR2 for purposes of the constituency review. The final form of numbering for chapters and rules will be determined once the complete structure for AACR3 has been finalized.

1. Objectives and principles

General comments on the formulation or application of the objectives and principles established for part I:

A. Scope, structure, terminology, etc.

General. There remains tension between the description of a manifestation of a published work and the recording of information more appropriate to item-level description, e.g. provenances, MS annotations in a work, imperfect copies.

Objectives:

Comprehensiveness
Consistency
Clarity
Rationality
Currency
Compatibility
Adaptability

Ease and efficiency of use

This should include ease of use for people with accessibility issues, such as visual impairment, e.g. compatibility with text/speech software and text enlargement software. Also how about issuing of a concise version that can be easily assimilated whether in print or electronically?

7 Early printed resources. There is reference to directing cataloguers to other manuals. Will this also apply to other areas, e.g. Cartographic materials?

Format

Principles:

Generalization
Specificity
Non-redundancy
Terminology
Reference structure

B. Functional Requirements

Objectives:

Responsiveness to user needs

CILIP would like something to be said in the introduction to the rules about what catalogues do and are for.

Cost efficiency
Format independence

Principles:

Differentiation
Sufficiency
Relationships

Representation

Background document, p. 6. "The data in the description should reflect the resource's representation of itself." Whilst we understand what this is attempting to say, we're not sure what it actually means.. Representation is not a function of the resource – rather of the describer.

Accuracy
Uniformity
Common usage

2. Organization of the rules

Comments on the scope and organization of the sections and chapters in part I:

We hope that there will be no temptation to retain this numbering system. It is very cumbersome to have capital letters appearing twice in each rule number.

The general introduction will need to address things like the definition of 'prominently'.

Section A – General rules

Scope and organization of chapter A1 – General rules for description

A1.0F2. This rule seems perfectly reasonable in the case of data that is transcribed in a different form from that in which it appears on the item (usually changing upper case to lower), but it is unclear why the cataloguer should tacitly supply diacritics missing in the original in cases of direct transcription. Also, there is no guidance offered to help determine whether such characters are indeed missing, nor is any attempt made to define what's meant by "context".

A1.1B4. Since "title proper" and "statement of responsibility" are two separate elements, this rule would be clearer in its intention if it were redrafted to begin: "If the title proper includes information which would normally be a statement of responsibility"...

A1.1B6. Do we need to try to provide some sort of guidance about "long" in respect of this rule, or should it be left to the cataloguer's judgment?

A1.1B6. The first part of this rule would be better incorporated into A1.1B4 as they're essentially different aspects of the same problem. Guidance is needed on how the cataloguer might be able to determine what's "intended" by the author, publisher, etc.

A1.1B11. It's important to ensure that a supplied title is sufficiently distinctive to allow differentiation from other similar resources. For example, items in a collection of photographs of a building, place, etc., should not all have the same supplied title as this leads to retrieval and display problems. This should be made explicit in the rules here (or at B4.1B if it's felt that it's not capable of generalization), perhaps with examples or suggestions for creating specific supplied titles (e.g., by including the compass direction of the camera, time of day, season, etc.).

A1.2A2. We are opposed to the limitation introduced on taking only data found on the chief source of information and to enclose information from all other sources in square brackets and feel this is a retrograde step.

A1.2B1. As the second sentence of this rule contradicts the first, they would be better combined into a single sentence, joined together with a "but".

A1.2B2. It is unclear why this rule should be applied in the case of symbols etc. which can be reproduced by the cataloguer as it goes against the principle of transcription set out in A1.2B1. This rule should be rewritten to give specific guidance on the application of A1.0F6 to edition statements.

A1.2B3. The first sentence of footnote 5 seems of limited practical value. Whilst it may be a useful warning, it doesn't help you determine whether you have an edition statement or printing information. Isn't the user's need for some more

specific help about what is or isn't an edition statement in this context, rather than a warning that some things that might appear to be in fact aren't?

A1.6H3. Whilst understanding that this rule has its basis in the rules for continuing resources, we remain concerned that the diametrically opposed ways of handling phrases such as "new series" – dependent entirely on whether or not the series is numbered – is unhelpful and confusing to both cataloguers and, because of the different ways in which such data is likely to be indexed, to users of our catalogues. We would urge that some consideration be given to providing consistency in the way in which such series information is recorded.

A1.8B1. There is no evidence of an electronic ISSN ("eISSN"). It would be helpful if there were, and some recognition given also of whether or not this affects the creation of a new record (without seeing the draft of Part 2 it is impossible to make any sensible comment on this). The ISSN that is given at A1.8B1 is for a serial ("American libraries", ISSN 0002-9769) that continues a ceased serial ("ALA bulletin", ISSN 0364-4006) and the change of title has necessitated the creation of a new record. The new title has a new ISSN. No account is made of this situation and the multiple situations where titles undergo a "major" change but ISSNs don't change at all, for example.

One might expect to find some instructions on multiple ISSNs associated with a serial title (whether represented by one record or not; e.g. if it exists in multiple formats) in A1.8. AACR2 12.8B1 at least had three examples of ISSN. The first example at AACR2 12.8B1 is for a serial that also has another ISSN ("Jahrbuch der Psychoanalyse", 0448-1321), but no new record. The second example is for a serial that has only one ISSN but exists in both print and electronic versions ("Environmental entomology", 0046-225X). The last example is for a corrected ISSN (formerly for the serial title "Nachrichtentechnik") that is qualified by: "(corrected)". Each of these more complex examples of ISSN has been dropped from A1.8B1. This results, for example, in no example at A1.8E1. (Qualification) of an ISSN that is qualified. Reading A1.8 one could continue in infelicitous ignorance of the existence of the ISSN Agency's rules for the assignment of ISSNs.

A1.8B2 "If the resource bears two or more such numbers record the one that applied to the resource." What about an item bearing both ISBN-10 and ISBN-13? Both numbers apply to the item. Given the projected publication date of AACR3, and the full implementation of ISBN-13, the rules need to take this into account.

A1.9B2. This section is quite detailed, yet it still does not advise what to do if all these different types of media are issued as a pack or kit. It does not offer the option of describing it as a "case" in the technical description area, with the added option of describing the contents of the "case" in a note. Presumably the line "Record each technical description on a separate line" would, when translated into a machine-readable format mean a separate field for each of these media? Cataloguers should at least be given the option of using "1 case" or "1 kit" where various multimedia types are issued in a container. "Kit" seems to have

disappeared from the glossary – presumably it is intended this term be no longer used?

Scope and organization of chapter A2 – Resources issued in successive parts

A2.1B1. Consideration should be given to making this a “serials only” rule (i.e. reverting to AACR2 practice), so that multipart monographs follow the general rule at A1.0F8.

A2.[8]. It would be helpful if at least some cross reference was made from A2 to A1.8 since anyone looking at A2 for guidance on what to do with ISSN as one of the most widely-used identifiers for serials is left high and dry.

Scope and organization of chapter A3 – Integrating resources

Section B – Supplementary rules applicable to specific types of content

Scope and organization of chapter B1 – Text

Scope and organization of chapter B2 – Music

Scope and organization of chapter B3 – Cartographic resources

Scope and organization of chapter B4 – Graphics

Scope and organization of chapter B5 – Three-dimensional resources

Scope and organization of chapter B6 – Sound

B6.7B8. We suggest adding:

Make notes of the names of narrators of spoken word recordings of textual works to assist visually impaired people; it is also useful to indicate gender and if the narrator is known to be a non-native speaker of the language of the text).

Reason: visually impaired people often have preferences regarding narration; some dislike certain voices and will choose not to listen to recordings by them.

Some also find male (or conversely, female) voices easier to hear.

Comprehension is also affected by whether the narrator is speaking in their native tongue: e.g. English narrated by someone with a French accent is less comprehensible to some people. Revealweb's catalogue of resources in accessible formats always includes the name of the narrator; gender and non-native speaker status are included if known.

Scope and organization of chapter B7 – Moving images

Section C – Supplementary rules applicable to specific types of media

Scope and organization of chapter C1 – Print and graphic media

We suggest *printed* as a more appropriate term. People might mistake it for 'prints' at first glance.

C1.5C4 Production method and Technical description note C1.7B13. Indicate where items are in large print or giant print and the actual font size. Preferably in the technical description rather than the notes area. The default of no statement would indicate standard size (point 12 or smaller). *Reason:* In the UK, visual impairment is the inability to read point 12 print even with the assistance of spectacles or lenses; but people may be able to read a larger font size with corrective aids or magnification. However, this is highly individual: a person may not be able to read commercial large print (14, 16) but can read specially produced large print (e.g. 20, 24)

Scope and organization of chapter C2 – Micrographic media

Scope and organization of chapter C3 – Tactile media

C2.5D1. Second sentence is now redundant – covered by general rule A1.5D1.

Scope and organization of chapter C4 – Three-dimensional media

Scope and organization of chapter C5 – Audio media

Scope and organization of chapter C6 – Projected graphic, film, and video media

C6.5. The technical description should include, where appropriate, an indication that the item has features to support those with sensory impairments. E.g., 'subtitles' and 'close captioning' (hearing impairment), 'audio description' (visual impairment). Note that 'close captioning' sometimes requires the use of specific equipment.

Scope and organization of chapter C7 – Digital media

MARC 21 has provided for the input of URLs etc. for some years but their existence, and their value in a catalogue record, is still completely ignored by AACR. Can we not have a Note where such details can be recorded? Some kind of evidence of existence needs to be included, in a way which is not necessary for conventional materials. It's hard to imagine that anyone who catalogues an internet resource would not wish to indicate where it could be found.

3. Focus of the description

Comments on instructions in the Introduction and in rule A1.0A1 on focus of the description:

We generally like this approach; it looks like it is getting around the difficulties of differing (national) approaches. It will be interesting to see whether, in practice, it works - or is just side-stepping the problem!

A1.0C Punctuation. The comment about metric unit symbols doesn't really seem to be appropriate here – both too specific for this rule and concerned with something that *isn't* punctuation, therefore out of scope for the rule.

CILIP notes that it was opposed to treating metric unit symbols such as cm and mm as symbols rather than abbreviations when this issue was first raised, and remains unconvinced that the community at large will welcome this change.

4. Resources in an unpublished form

Comments on the scope and placement of rules pertaining to resources in an unpublished form:

General rules (A1.1B11, A1.2A1, A1.4C8, A1.4D9, A1.4F8, A1.7B12.2, A1.7B14, A1.7B30)

There's an issue about how to describe MS items in which works and/or redactions are physically overlaid on one another, as in revised drafts or in palimpsests. Is such an item better seen as 'finite' or 'integrating' or something else again, such as 'composite' (different from mere aggregated collectanea)?

Supplementary rules applicable to text (B1.1B11, B1.1E6, B1.4F8)

Rules on resources in an unpublished form from AACR2 omitted from the draft of AACR3

5. Resources issued in successive parts

Comments on rules pertaining to resources issued in successive parts:

General comments

It is very helpful that rules for serials and integrating resources have been separated into two chapters. This is not the view of the CONSER response ("CONSER comments on the December 2004 draft", hereafter referred to as the "CONSER response"), but experience has shown that while these are both continuing resources (a concept apparently lost in AACR3 anyway) it is much easier in training to deal with loose-leafs or updating Web sites etc. *separately*. It is not at all the case internationally that integrating resources are catalogued by serials cataloguers or monograph cataloguers discretely and thus it is useful for the IR rules to be provided discretely.

The same point applies, but in reverse, to the conflation of multi-parts and serials in one chapter on resources issued in successive parts: serials cataloguers are now lacking a chapter on serials specifically and while the *acquisitions* function cannot rule how these resources are *catalogued*, it is questionable how this conflation may impact the real world where the manifold acquisitions tasks associated with multi-parts and serials are quite different.

Numbering area (A1.3)

A1.3C4, final paragraph. The wording of the text preceding the last two examples remains unchanged, with the exception of the substitution of “record” for “give” (AACR2 12.3C2). The first example, however, has been changed so that where formerly a forward slash separated the year from the number now there is a dash. Both examples retain the parenthetical explanation “(Designation appears on issue/part as: ...)” presumably to illustrate both the rule of recording the year before the number *and* the punctuation. So, it would now appear that you follow the punctuation on the issue since now the issues’ dash and the numberings’ dash match. The CONSER response to this change is to recommend that the slash is used (not the dash) by analogy with the use of the slash in the 5th and 7th examples at A1.3C1, viz. “97/1-” (following, for example: “1961/2-”).

While the use of the slash for recording numbers/dates (like “1998/1999-”) is clearer than a dash, surely the point of the last section of the rule A1.3C4 is that the year is treated as or is effectively representing a *volume*. In this case, then, it would surely be clearer if the punctuation were prescribed and that prescribed punctuation should be a comma. This punctuation clearly conveys to the user that the first number is the “volume” number and the following number is internal within that volume. Neither a slash nor a dash achieves that same clarity which is understood by the convention for this use of the comma.

Variation in practice will remain for as long as the examples are either self-contradictory or suggest punctuation that does not immediately make sense to the user. The phrase at A1.3C1 “but not necessarily with the same punctuation” seems to mean, at least when read in conjunction with these two examples, that the cataloguer uses a dash since there is no explicit instruction on how to punctuate. The examples therefore are loaded with an importance they should not be made to bear. In order to avoid the situation where the cataloguer is given the impression s/he can punctuate as s/he pleases, an explicit instruction should be given on using the comma to separate the two levels of enumeration (whether the volume is presented as “Vol.” or as a year treated as a volume).

A1.3E1. The draft has: “record the systems in the order in which they are presented”; The current equivalent LCRI 12.3E1 has: “prefer to record as the first a system that uses the form of volume number and internal number”. While the LCRI achieves consistency of presentation for the double numbering situation, it may destroy the “intention” of the publisher where a numbering system *without* an internal number is the system that most obviously identifies a given issue. It may, of course, be impossible to determine which system is intended to perform this function. Can it be considered whether the rule may be adapted to retain its present instruction to record in the order of presentation on the item but when this cannot be determined to give the system using a volume number and internal number first?

General comments on numbering area in connection with source of information

It is generally unhelpful for serials cataloguers that the section on numbering has been removed to A1.3 where rules on numbering that apply to serials only must be teased out from rules that apply to cartographic resources, for example. Can

reference be made from A2 to A1.3 that A1.3 is where the serials cataloguer will find rules on numbering? Ideally, it may be better to recognize that this area cannot be generalized into A1 at all.

A1.0A1 c) certainly retains the instruction to “choose a chief source of information pertaining to the first issue or part or, lacking this, the earliest available issue or part following the instructions in A1.0A2”. However, A1.3 and A2 (in its entirety) lack this fundamental rule’s wording that is found in AACR2 12.0B1 a) and 12.3A1 a). There do need to be cross references given from A1.3 and A2 back to A1.0A1 c) or each section (and this is preferred) requires an introductory paragraph restating this crucial rule. A1.0A1 c) could not be further removed from the two sections of AACR3 where the instruction needs stating: A1.3 and A2. By both this relocation to A1.0A1 c) and lack of reiteration at A1.3 and A2 the point about the “source of information ... [being] the first issue or part or, lacking this, the earliest available issue or part” becomes fuzzy indeed.

Fuzziness is also exacerbated by the use of the word “pertaining”. Why is this word used and what is it intended to mean; does it mean anything different to the rule as currently worded? If it is intended to refer to the multiple sources available – but only one of which may pertain to the first/earliest issue – for describing remote access electronic serials, then this needs to be said. Otherwise, it is not clear.

Further blurring is made by A1.0A2 where this addition is made: “(e.g., a title page and its verso, the labels on either side of a disc, a sequence of title and/or credit frames)”. The CONSER response takes this addition to task and CILIP endorses those criticisms. A further point is that such a rule does not provide for retrospective cataloguing of serials where current practice (see: CONSER Cataloging Manual, Module 16, 16.2.5 b. “Selection of the chief source”) pragmatically requires the cataloguer to choose, for example, the most stable title (different from a difference in “degree of completeness”) or the title that is not necessarily that on the title page in order to avoid generating multiple records. It would be very helpful if AACR3 could take account of these situations or at least not codify the rule on source of information such that for serials transcription of titles may become ever more troublesome.

Title and statement of responsibility area (A2.1)

A2.1B6. Although the use of “etc.” always allows for just about any scenario, one CILIP representative proposed that it would be clearer if “title” could be added to the list of elements which, if they changed from issue to issue, could be omitted.

Examples could be added:

Focus on ... (National Archives of Canada) [Uniform title]

MAPE focus on ...

The Fabulous Furry Freak Brothers

Edition area (A2.2)

Publication, distribution, etc., area (A2.4)

Technical description area (A2.5)

Series area (A2.6)

A2.6G1. The CONSER response to the part of this rule that applies to serials is to request that the rule be made optional. We prefer that it is *not* made optional since it is not pragmatic to edit the record repeatedly to add each new issue's number within the series as and when it appears. However, if such an option were to be accepted, the rule should state clearly that it applies only to serial analytics.

Note area (A2.7)

A1.7B (as it applies to resources issued in successive parts). This rule continues to impose an ordering of notes which is helpful as it guarantees a consistency of presentation that would otherwise be lost.

A2.7B9. General comments. It could well be argued that it is inconvenient to be forced to consult two different rules (A2.7B9 and now also A1.7B9) for notes on bibliographic relationships (for serials in particular). More grievous, though, is the continued lack of acknowledgement in AACR that these types of notes are handled in MARC as linking entries. Further, these linking entries in Web OPACs commonly display to the user as hypertext links which s/he may follow to the related record. While it is probably incumbent on MARC (rather than on AACR) to reform the use of the first indicator in linking entry fields that is intended to be used to suppress display of the "note", surely it is timely for AACR3 to present the examples in A2.7B9 (but not in A1.7B9) to reflect OPAC displays as well as, or instead of, as they would appear on a catalogue card? For splits, mergers, and absorptions some adaptation of A2.7B9 would be helpful to indicate that more than a "simple" note is normally being made.

A2.7B13.1. It is unclear why this is .B13 data rather than .B12 (i.e. Technical description rather than Publication, distribution, etc.)

A2.7B13.2. The significance of the word "other" in this rule is unclear; it may have belonged to a previous draft and be no longer relevant.

A2.7B27. Issue, part, or iteration described

The word "iteration" is used in the heading for this rule, but the text goes on to say "if the description is not based on the first issue or part, make a note". As iteration is currently defined in the AACR2 glossary, its use here in the chapter on resources issued in successive parts is inappropriate ("Iteration. An instance of an integrating resource ..."). This point applies also, but in reverse, at A3.7B27.1 where the use of "issue" and "part" is inappropriate in a chapter on integrating resources.

The current LCRI on this rule says the opposite of the AACR3 draft: "The 'Description based on' note may be combined with a 'Source of title' note but not with a 'Latest issue consulted' note. If needed, always give a 'Latest issue consulted' note as a separate note". The rationale for the LCRI would appear to be that the source of title for the earlier issue, upon which the description is based (DOB), may or may not be the same as the source of title for the latest issue consulted (LIC). Should not AACR3 take account of this problem and require that the LIC is given as a separate note if (but *only* if) the source of title actually differs from that of the DOB?

6. Integrating resources

Comments on rules pertaining to integrating resources:

Title and statement of responsibility area (A3.1)

Edition area (A3.2)

Publication, distribution, etc., area (A3.4)

Technical description area (A3.5)

Series area (A3.6)

Note area (A3.7)

Standard number and terms of availability area (A3.8)

7. Assembled collections

Comments on the scope and placement of rules pertaining to assembled collections:

General rules (A1.4C8, A1.4D9, A1.4F8, A1.5B5, A1.5D3)

A1.4C8. It seems a long way from the beginning of A1.4C before you discover you can ignore this section if you have an unpublished item (same applies to A1.4D). This may be unavoidable, but possibly flag the exception in A1.4C1 and A1.4D1 ("Unless the resource is in an unpublished form, transcribe...")

Supplementary rules applicable to text (B1.1B11)

Supplementary rules applicable to print and graphic media (C1.5D3)

8. Early printed resources

Comments on the scope, placement, and application of rules pertaining to early printed resources:

General rules (A1.4D1, A1.4G1,)

Supplementary rules applicable to print and graphic media (C1.5B2.1.19, C1.5D1.1, C1.7B13.2, C1.7B28.1)

Rules on early printed monographs from AACR2 omitted from the draft of AACR3

9. Sources of information

Comments on the generalization and reworking of rules on sources of information (A1.0A):

A1.0A2. Whilst the objective of trying to cover all physical forms in the same rule may be an admirable one, the result suggests this may not be the best approach. At the very least, it would surely be much clearer for cataloguers if each format still had its own list of sources as well.

A1.0A2. Another source of information for websites is an 'About' or similar section accessible from the initial display screen, navigation bar, or menu. This source will often have a statement of responsibility. The other specific sources noted are all 'opening' or 'entry' screens (equivalent to title page), but it is frequent practice to put statement of responsibility, publication and other information in an About section.

A1.0A5. This rule now requires that the Edition area use chief source of information only. This is far too restrictive, as edition statements so often do not appear on the chief source.

A1.0A5: The colophon is no longer a prescribed source of information in the Publication etc. area. Is there a reason for this?

10. General material designation

Comments on the revision of rules on general material designation and the terms used as GMDs (A1.1C):

A1.1C. CILIP is divided on the revised rules for GMD. The division of the terms into separate lists for Content and Medium, and the option to combine lists, is welcomed in some quarters, but the results regarded as more complex than ever in others.

A1.1C1. Medium. The term "print" may be read by some as referring to "art print" – "printed" might be a preferable term.

A1.1C1. Medium. Is this list prioritising 'digital' or is it making it mean - or interpreting as meaning - something other than what it actually means? (For example, where is 'analog'?). It seems that we could have [sound : digital] but are explicitly not allowed to use [sound : audio]. So it's unclear what happens about reproductions of sound that are not digital and how they would be represented.

A1.1C1. Notwithstanding the division of the GMD terms into separate lists for Content and for Medium, and the option to combine lists, there is still an issue for accessible materials - due to the fact that the ISBDs only provide for GMDs in the title area of bibliographic descriptions. However, for a record to state that it is [text : print] is of no use to a visually impaired person - only a large print item is likely to be of use and they can't tell that from the statement. Again, to state [text

: tactile] gives some information but someone who reads Braille is unlikely to be able to read Moon and vice versa. If the cataloguing has been thorough, the additional information can appear in the technical description. However the GMD is useful in results lists before you get to the full records, and visually impaired users need that information at that initial level. For the VI community it would be preferable for the Medium list to be SMDs not GMDs.

A1.1C1. It is unclear what Medium designation would be used for manuscript text. If it were to be "graphic" (and it would be the only option left after all the others had been more easily ruled out of the running) then that would seem to conflict with the laudable principle that terminology should reflect current usage.

11. Publication, distribution, etc. area

Comments on the revision of rules pertaining to the publication, distribution, etc., area:

Elimination of the use of "s.l." and "s.n." (A1.4C6, A1.4D7)

CILIP believes the complete omission of this element is unsatisfactory in view of the fact that it would also be omitted for *unpublished* material. In future, how can the user tell if the cataloguer has made an error and missed out this information rather than there being no indication of place or name in the publication area? CILIP would prefer to indicate this in some way. Complete absence could look like a mistake.

12. Technical description area

Comments on the scope, placement, and application of rules pertaining to technical description:

There seems to be no point in trying to include so much in the main chapter when the detail for individual formats is all in the separate chapters. It would be much better to delete almost the whole of A1.5, write something in very general terms to replace it, and refer to the individual chapters, because as it is it is overwhelming with detail. It would be much clearer if each format were completely separate.

General rules on extent (A1.5B)

A1.5B1. Table 1 for SMDs is not exhaustive, e.g. recorded sound (where are wax cylinders?). What about digital sound, such as MP3 files? How are these treated? Also, is DVD audio or digital? There is a general problem when separating carrier into content columns in this way as the carrier can be used for one or more media.

A1.5B1 What is the meaning of the term 'braille cassette' in Table 1? It's not a term with which those working with the VI sector are acquainted and it's not in the glossary.

A1.5B3. This rule uses the expression “Playing time” – but not all resources are “played”. Are films “played”? It would be better to use something like “running time” (“Playing time” is also used in C6.5.B3).

General rules on other technical details (A1.5C)

General rules on dimensions (A1.5D)

General rules on ancillary material (A1.5E)

Supplementary rules applicable to print and graphic media (C1.5)

C1.5B2. In the first of the instructions in this rule, the use of “pages, leaves, etc.” must implicitly also mean “bearing text, images, etc.”, otherwise this rubric would apply equally to scores, parts, maps, etc. This should be made explicit.

C1.5B2.1.1. Whilst appreciating the clarity and consistency brought about by recording the number of physical units for all materials (A1.5B1), CILIP does not believe that being required to specify the number of volumes for *all* books will be welcomed by the community. Could we not continue with the default that everything is one volume unless stated otherwise (cf. dimensions of microfiche, etc.)?

C1.5B2.1.8. The fact of something being “loose-leaf” seems to be recorded twice – here and in A3.8E1. Although the provision of this information arises in different contexts, the need for such duplication needs to be investigated.

Supplementary rules applicable to micrographic media (C2.5)

Supplementary rules applicable to tactile media (C3.5)

Supplementary rules applicable to three-dimensional media (C4.5)

Supplementary rules applicable to audio media (C5.5)

C5.7B. This could do with either instruction on, or examples of, “analog in origin, digital enhanced sound” (e.g. digitally enhanced recordings where the original recording was analog but has been digitally enhanced – and to what specification).

Supplementary rules applicable to projected graphic, film, and video media (C6.5)

See comment at A1.5B3

Supplementary rules applicable to digital media (C7.5)

C7.5C13.1. ‘When recording ... considered to be important.’ We suggest rewording to: ‘...considered to be important, for example to enable a visually impaired person to decide whether they are able to use the file.’

Potential for further generalization of rules on technical description (e.g., X.5C10)

13. Note area

Comments on the scope, placement, and application of rules pertaining to notes:

A1.7A4. Other works... “Use the title or name-title...” – this is an inelegant way of expressing the concept, although we’ve been unable to come up with anything better! Furthermore: “If this is not possible” – when wouldn’t it be? Or does this phrase actually mean “If it is not possible to determine what this would be”?

A1.7B10. This is one of a number of places in which the draft continues to refer to “the library”; JSC may wish to consider whether it should try to generalise such terminology.

A1.7B20. The rule carries over from AACR2 an instruction not to provide a summary for a resource “that consists entirely or predominantly of music”. This requires review. What about, for example, a sound recording that accompanies an art installation? (Real world example: Recorded sound that accompanies sequence of paintings by Richard Mortensen at Trapholt Museum, Denmark. The sound is available on a separate medium). There seems to be no provision for providing this information in a B6.7 note either.

A1.7B20 Summary. We would argue strongly for retaining this, at least for accessible materials. *Reason:* The catalogue record is the basis on which visually impaired people select items to ‘read’ – they cannot pick an item off the shelf and flick through it. Perhaps the text could indicate this as a reason for including a summary. Revealweb includes a summary for all items, whether fiction or non-fiction, apart from music scores.

A1.7B22. The inclusion of finding aids is welcome. The scope might be clearer if it indicates that, while indexes can apply at item-level and collection-level, other aids - such as lists, catalogues and descriptive monographs - apply to collections of resources.

A1.7B22. It is difficult to know whether an index is ‘considered to be important’. It would be much better either to be told either to mention indexes every time or to ignore them altogether. The rule needs to be unequivocal, otherwise we shall never get any consistency.

Generalization of rules on notes (e.g., A1.7B15)

Potential for further generalization of rules on notes (e.g., X.7B21)

14. Glossary

Comments on the terms and definitions included in the glossary:

Assembled collection: The definition should make it plain that it covers distributed collections; that is, collections which are not stored in a single contiguous location. This will clarify application of the rules to collections assembled by multi-branch services, or stored in split locations within a library for curation purposes, etc.

May be useful to add ‘audio description’.

Audio media. Does not mention MP3 format, etc. i.e. digitally stored and reproduced sound. This is contrasted with “Digital media” which excludes recorded sound for reproduction.

Couldn’t find ‘braille cassette’ (referred to in A1.5B1, Table 1) so don’t know what this is (a US term, perhaps?).

May be useful to add ‘close captioning’.

Entry for ‘dependent supplement’ needed (A1.5E4 refers)

Also add entry for ‘Moon’ (another tactile alphabet based on simplified letter forms).

Pamphlet. The definition in the Glossary is not very helpful.

Statement of responsibility. The glossary definition seems pretty clear that such a statement must include the name of a person or corporate body. A1.1F14 allows statements that lack the name of a person or corporate body to be regarded as statements of responsibility. The glossary definition needs to be extended to cover the situation provided for by A1.1F14.

Tactile media. Change ‘for use by the visually impaired’ to ‘for use by visually impaired people’. *Reason:* this is preferred usage within this sector.

There is no entry for “Work”. However, both “expression” and “manifestation” are defined in terms of “work”.

15. Style

Comments on matters of style:

“Data” is used as a plural noun. Conventional usage now clearly leans towards the singular?

The purpose and/or significance of the use of italics for “or” and “and/or” (in A1.1C1 and *passim*) is unclear.

Tables of contents for chapters and areas

Captioning of subrules

Should the caption always appear in the body of the text that follows? This seems to happen most of the time – even when not necessary either for reasons of grammar or intelligibility. But it's not always the case.

A1.1B7. In caption consider replacing “forms” with “languages or scripts”.

References to related and supplementary rules

A1.5B3. This rule seems to require a further forward reference to B6.7B21.

Clarity of instructions

A1.1F5. Includes parenthetical comment “or its equivalent in a nonroman script” in respect of “et al.”, but A1.0F8 does not say this for “sic” or, indeed, “i.e.” –this seems inconsistent.

There are some very long sentences (e.g. A1.1F13).

A2.1F1. Make wording more like A3.1F1.

A2.1F16. Make wording more like A3.1F16.

C2.5D1. Consistency of wording issue – cf. C1.5D1.1 & A1.5D1.

16. Typographical and grammatical errors, etc.

Please reference errors, etc., in the form: [page number] - [rule number] - [paragraph or example number]

- A1-9 A1.0C1, example: ‘but’ should be in Times, not part of text of example (cf. next example on next page).
- A1-14 A1.1A1, para. 2: for ‘data as they appears’ read ‘data as they appear’
- A1-24 A1.1F1. sentence ‘If the statement of responsibility...’ which is at the end of the examples: wouldn’t this make more sense *before* the examples, as one of them illustrates its application?
- A1-46 A1.4D2, example 2: *not* should be in Times
- A1-71 A1.5E3: Add space before opening quotation mark
- A1-104 A1.11A, example 1: error in para 2: delete full stop after Vols. 39-40
- A2-3 A2.1B6, example: The word *Note* should be in Times, as being part of the text, not part of the example itself. Same thing several times in C1.5B2.1.12 etc. and probably elsewhere.
- C6-6 C6.7B13.2, example: x should be multiplication sign ×

Appendix. Comments on examples (provision, absence, style, coverage)

(Comments that cover rules and examples at one and the same time are repeated here for sake of completeness)

A1.0F5. Example needs a long dash, not hyphen

A1.0F8. Add example(s), or move from A1.1B1.

A1.1B1. The examples for the use of “[sic]” and “[i.e. …]” are interchangeable, and don’t illustrate the difference (if any) of the application of this device as given at Page A1-12 - A1.0F8.

A1.1B1. Provide an example of a title proper containing and embedded colon.

A1.1B8. Can we have some typical examples of multi-volume books here?

A1.1C2. Is the Jules et Jim example correct? Consider:
[moving image : video]

A1.1C2. The WordStar example lacks a medium element – is it assumed or otherwise not wanted? If so, add suitable comment to end of A1.1C1.

A1.2B2. Replace the “three asterisks” example with one that includes an unreplicable character.

A1.2D1. In the first two examples, the use of upper case at the start of the statement relating to a named revision of an edition (“Reprinted with corrections”, “New ed., rev...”) should be changed to lower case, in line with ISBD(G), 2004 version.

A1.3G1. Example needed for situation in which caption changes but nothing else (e.g. “Issue” to “No.”)

A1.5B1. – Optionally (p. A1-56, top): The examples duck the issue of the plural of “DVD-audio” etc. Will practice be “2 DVD-audios” or “2 DVDs-audio”? This will lead to inconsistency in practice, and the examples should be changed. “DVD-audio” is usually applied to the recording format and not the carrier. “DVD-A” is used to refer to both the format and the carrier, and would be a better example. This also follows past history: an example of “1 CD-recordable” would have implied “3 CD-recordables”. In practice, of course, “3 CDRs” is a relatively pleasant alternative. “5 CD-RWs” and “2 DVD-Rs” are equally acceptable, consistent, and extendable examples.

A1.5C4 / A1.7B13 Suggest that one or other section requires an example of ‘audio described video’. These are versions of ‘ordinary’ videos and DVDs with additional narration (describe action sequences, characters facial expressions, etc when there is no dialogue) for visually impaired people.

A1.5D3. Remove last example – it’s in the wrong block of examples, and there’s already an equivalent example provided to demonstrate the point

A1.7A4. – Notes relating to reproductions: It would help clarify the application if examples were given, particularly to illustrate the production of a single note for all aspects of the original, while retaining separate notes for different aspects of the reproduction.

A1.7B15. – MLA examples: These are not consistent with the established standard forms given in the other examples and in C7.7B15. Our interpretation of established practice is that this note is given when the default requirements implied by other areas of the technical description are inadequate. Thus, a system requirement is not usually given for a digital resource which is a plain text file, but is given for a Word or PDF document, etc. Extending this to audio (digital) and moving-picture (digital) resources results in an example like "System requirements: Windows 98 and photo-viewing software - for accompanying JPEG files." instead of the third MLA example. Similarly "System requirements: SACD-compatible player - for optional SACD component." is more consistent (and concise) than the second MLA example.

A1.7B22. It would also be useful to include an example involving a catalogue.

A1.7B24. It might be useful to include an example of a locally-assigned number when the resource is a manuscript or is unpublished (i.e. is a unique item).

A1.7B24. Add serial and more current: e.g. CODEN; DOI (restoring also the serial example currently at AACR2 12.7B20).

A1.7B30. The example "Access restricted to subscribers via a username and password or IP address authentication" is too clumsy and will lead to needless variation in phrase in application. Better phrasing is "Access restricted by username and password or IP address authentication". The use of "subscribers" and "subscription", as in another of the examples, may, or may not, indicate charges (as would "members", etc.), but there is a case for noting any such costs under A1.8D1. "Access restricted to authorized/registered/licensed users." may be a better general, standard phrase.

A1.8B1 An example of a 13-digit ISBN should be included.

A1.8B2. Please restore the serial examples from AACR2 12.8B1

A1.8D1. It would be useful to add "For subscription by individuals and institutions" as an example, following the pattern of "For hire" (see A1.7B30.)

A1.11A, example 3, note 2: wouldn't it be more in the spirit of AACR to say
This translation originally published: 1922 ?

A2.7B9 a) Merger. In the 2nd example "become" is used, as it is in AACR2 12.7B8. It is common practice to use "form" in such notes on mergers. "Form", used intransitively, is more precise than "become" which implies something more amorphous has taken place.

B2.7B24. In preparation of the December draft, some of this rule (relating to a resource in several volumes) was generalized and placed in A1.7B24? The editor noted that some of the examples will need to be moved too.

C5.7. The note area for Audio Media could do with either instruction on, or examples of, "analog in origin, digital enhanced sound" (e.g digitally enhanced

recordings where the original recording was analog but has been digitally enhanced – and to what specification).

C7.5C13.1. Add example with the file type 'Braille file'. Note that visually impaired persons can use other file types, e.g. ASCII with speech synthesis software as it has little formatting; other files with more formatting can cause problems.