

To: Joint Steering Committee for Revision of AACR

FROM: Jennifer Bowen, ALA representative

SUBJECT: Levels of description, access, and authority control

ALA appreciates the efforts of the ACOC representative to draft a set of guidelines for levels of description, access, and authority control. On the whole, ALA approves of the concept of levels as described in the ACOC rep. document. We offer the following responses to the questions posed within the original document, a discussion of our other general concerns, and some comments and suggested revisions on specific rules.

### **Responses to questions within *5JSC/ACOC rep/1*:**

#### **1. Provision of separate levels for description, access, and authority control**

ALA agrees with having separate levels for each section of the rules, as long as the wording of the General Introduction is informative enough to help catalogers understand the “big picture”, especially regarding levels for description and access. This may be something that could be addressed more explicitly in the wording of 0.X.

#### **2. Placement of the levels in relation to the parts of RDA**

Agree with the approach in *5JSC/ACOC rep/1*

#### **3. Adequacy of the general instructions in 0.X**

As mentioned above, we’d like to see more instruction here, in particular a very brief overview of the levels in the three sections. We’d also prefer that the discussion of Options be kept separate from the instructions on Levels in the General Introduction.

#### **4. Number of levels provided**

ALA agrees with the rationale of not creating new levels when they are not needed, as well as with the concept of allowing libraries to add additional data elements in accordance with a library’s policy or cataloger’s judgment. However, we note that this in effect creates an implied third level. ALA is concerned that the lack of an explicit fuller level may lead users of the code to wonder why we have even bothered to include rules beyond those needed for the creation of the “standard” level. We suggest adding wording to explain WHY a library might decide to add elements above and beyond those included in the “standard” level of description, and also to explain why rules for additional elements are included in the code (e.g. to provide guidance and a standard for those libraries who do choose to go beyond the standard level).

**5. The relationship between the levels and related standards, and the choice of related standards**

We question why the ISBDs are not listed as related standards, since they are the source of the element set that is included in AACR/RDA.

**6. Whether the levels should parallel the terminology and structure of the Parts I, II and III rules in RDA**

Agree. ALA notes that using the word “Standard” meaning “default or regular” within a standard is likely to lead to confusion, as the meaning “officially sanctioned rules” is likely to be more salient. Should we consider renaming this level?

**7. In relation to authority control: whether levels for the reference entry and the general explanatory entry are needed?**

ALA believes that these topics should be included.

**8. The usefulness of the tables.**

ALA finds the tables to be very useful. However, their complexity (especially the inclusion of MARC21 data) means that we must make a significant commitment to maintaining them.

## **Other General Issues**

### **Usability of the rules:**

We would prefer that the number of footnotes be kept to a minimum to make these rules easier to read. Footnotes that refer to other standards could be made centrally (or perhaps with links in the text?), while others could be incorporated into the text of the rules themselves.

ALA notes that the distinction between the phrases “applicable to the resource being described” (1.4, 1.4.1, 1.4.2, 11.3.1, 11.3.2) and “applicable to the work or expression embodied in the resource being described” may be lost on some users of the rules. The repetition of these phrases over and over also makes the wording of the rules fairly dense. We do not have any specific simplified wording to suggest, unfortunately, but note that this will be an issue throughout Parts 2 and 3 in particular as we try to simplify the rules as much as possible.

## Comments on the Cover memo

### Background:

ALA notes the phrase "...whole bibliographic description including descriptive access points..." in the second sentence. We suggest phasing out this cataloging-specific meaning of the word "description" to refer to the record as a whole, and to limit its use purely to refer to the portion of the record that we consider "description", as opposed to access points, using the term "record" to apply to the description plus access points.

### Introduction:

The second paragraph says "no elements are treated as mandatory", while the third paragraph seemingly contradictorily says "each level constitutes a minimum set of elements". While on the one hand ALA agrees that it is very important to allow a cataloger to use whichever elements are desired, there is also a need to ensure that records that purport to be at a particular RDA level contain at least that level's element set. In addition to making a level's element set mandatory, or mandatory "if applicable", the rules must be clear whether for repeatable elements all instances must be given, or if only one or two instances are satisfactory. The proposed rules do say "first named" at some elements, but it is not clear what is meant when this is not stated, such as at 1.4.2 "variant title".

## Comments on Specific Rules

**1.4, 11.3, 21.3:** The wording in each of these rules that states that RDA "provides rules for the creation of a comprehensive set of elements" is not technically correct: the set of elements is "created" in the RDA document itself. RDA's rules are for recording values of elements that apply to particular resources.

The word "comprehensive" is also a bit of an overstatement. In addition to the lack of subject elements, there are plenty of bibliographic data elements that are not covered in RDA, including elements applicable to specific types of material (rare books) or to specific communities (archives), as well as the many elements in MARC 21 that are not in AACR/RDA.

We suggest changing the wording "all resources" in these rules to "a resource" or "any resource" so that the rules do not inadvertently imply that a cataloger should always use RDA for "all resources" rather than other content standards.

**1.4:** All three bullets could be eliminated. The first two sentences of the first bullet repeat text from 0.X that does not need to be repeated. The third sentence of the first bullet and the second bullet do not add information.

**1.4.1 and 1.4.2:** While we acknowledge the need to parallel the arrangement of RDA in the layout of the levels, the current formatting makes it difficult to compare the minimum

and standard levels without looking at the Tables, which add the complication of the other standards. Within AACR2, the levels are easy to compare because they are all on one page. We suggest presenting the levels of description in a chart with columns within the text of the rules themselves or otherwise formatting them so that they can be compared easily at a glance.

Without seeing the rules for levels of description within the context of Part 1, it is unclear how these rules will relate to the rules for recording parallel titles. If the rules for *what* to record are included in the Levels of Information, there will still be a need to provide some guidance on *how* to record parallel titles within the rules themselves.

**1.4.1:** For cartographic materials, “Scale” needs to be included in the minimum level of description. Also, we recommend omitting Statement of Responsibility and Series ISSN from the minimum level. In the case of Statement of Responsibility, a cataloging agency may want to omit this from the description and rely on access points for this information.

**1.4.1:** While “Numbering” is very important for identification of a resource, we note that requiring it at the minimum level would be above and beyond current practice. For example, the CONSER guidelines currently require recording the numbering only if the first issue or part is used as the basis for the description. Would requiring it at the minimum level mean that it should be recorded whenever it is known or can be ascertained in some manner? We would prefer that the CONSER guidelines be applied in this case.

In a related issue, we note that while the elements listed under 1.4.1 and 1.4.2 may be enough to support the user task “Identify” in most situations, sometimes they will not. For example, in some cases the “description based on” note (an element not listed either the Minimum or Standard levels) will be the key element of information that will allow catalogers (who are, after all, users of the catalog!) to identify a resource. Rather than add every possible data element to these lists, another approach would be to clarify in the introductory comments for these levels that sometimes additional elements may be needed in order to fulfill the FRBR user tasks, and that these are situations when the addition of optional elements may be desirable.

**1.4.1, 11.3.1:** It is not clear why “access” would be given to all FRBR group 1 entities, but that “description” would only be for manifestations. While bibliographic descriptions are made at the manifestation level, data elements related to the other group 1 entities are present within the description as well. ALA suggests that the wording of 1.4.1 name all four entities to parallel the wording of 11.3.1.

**1.4.1, 11.3.1:** The parentheticals in the element lists that are already a part of the definition of an element (for example, title proper) could be deleted. The parentheticals that are only meaningful in the context of a level need clarification. For example, does “statement of responsibility (principal responsibility)” mean the most major responsibility? the first listed? The parenthetical at “other numbers associated with the

resource” could be deleted, or integrated into the non-parenthesized text: “other numbers important for identification”.

#### 1.4.2:

- Under Identification of the Resource/Edition add “Edition statement”.
- Under Content Description/Related Content/Notes on edition and bibliographic history: add “predecessor” to the list of relationships.
- Under Sourcing Information/Note relating to binding and availability ...: add “if considered to be important”.

**1.4.2 and Table 1:** ALA members noted some discrepancies between Mode of Access/Note on System Requirements (presumably MARC21 Field 538) and the not-yet-completed Technical Description area of Table 1, which currently lists 3.7 “Mode of Access” as MARC 21 field 856. This will need additional discussion.

**11.3:** ALA notes that the wording of the levels of access was quite difficult for some reviewers to comprehend without the benefit of examining a Draft of Part 2 and the corresponding glossary definitions for “access point” and “citation”. The reactions to this portion of Levels of Access document strongly suggest the need for additional, thorough discussion within the JSC of the intended use of this terminology, and whether this intended use will be understandable to users of RDA, even within the context of the entire code.

While some of the following comments go beyond the Levels of Access document *per se*, we are including them here since the process of reviewing that document caused the issues to be raised within ALA. These issues will need additional discussion once we can see the Levels of Access rules within their proper context.

The concept of access point, in particular, is in need of theoretical explanation. Several ALA members were confused about the intended difference between an access point and a citation. There was a general misunderstanding of the function of the primary access point, and an assumption that it was intended to function as a unique identifier for a work (and, consequently, there was then skepticism that it actually **could** function in that regard, without an associated title). The definition of the primary access point (p. 5 of the Prospectus) as “the access point used as the initial element in citing a work” was not helpful, as that was interpreted as referring more to display issues rather than access. It was unclear how the concept of access points in general addresses the FRBR user tasks of “identify” and “select”. ALA members seem to naturally associate the concept of primary access point with the concept of an identifier for a work, and missed the distinction that the concept of primary access for the description of a manifestation was still necessary.

The focus that ALA reviewers placed upon the concept of a “work identifier” also brings up the issue of citation titles: if there is no citation title, how does one identify a work? Within *5JSC/ACOC rep /1*, there is no mention of a “citation for the work embodied within the resource being cataloged” or the use of a citation title (except when there is no primary access point for a name) within either the Minimum or Standard levels of access.

The current (AACR) take on this is that a uniform title is only needed when the title proper is somehow inadequate to identify the work and/or to collocate manifestations of the work. This would suggest that perhaps the title proper may in fact act as the citation title in most cases, and sometimes you will have something that functions as a work identifier by default (if no citation title is needed), and sometimes you won't, if a citation title is needed, but not supplied. If this is the case, then simply listing the elements required for each level of access does not actually tell the user whether or not a level will allow users to identify a work embodied within a resource or not, and the task of relating the levels to the FRBR user tasks becomes very muddy.

The 4<sup>th</sup> bullet is unnecessary and could be deleted.

ALA recommends that somewhere within RDA there be a description of keyword access as opposed to controlled access points. This is especially relevant to the minimum level of access, where a library may rely primarily on keyword access instead of controlled access points, and may not even use Part 2 of RDA at all. If keyword vs. controlled access is covered in the General Introduction or the Introduction to Part 2, we may also want to consider adding wording to 11.3 to acknowledge the use of keyword access as a supplement to the other levels of access.

**11.3.1 a):** the significance of the italicized “or”s is unclear. Could this subrule be reduced to saying simply “primary access point” without the additional explanation?

**11.3.2 b) ii:** This subrule is unclear. What if the primary access point is title? Then these are not “additional” persons, etc.

**11.3.2 c):** As mentioned above under 11.3, where do the levels of access mention the inclusion of a citation for a work contained within a resource, assuming that the resource only contains a single work (as opposed to analytical citations for works)? 11.3.2a) mentions “citation title” only in the context of the citation title as primary access point, but not in cases where the citation for the work is a name/title citation.

**21.3:** As long as RDA is not going to deal with subject information, it needs to be made clear that Part 3 in general and this rule in particular only cover authority records for FRBR group 1 and 2 entities.

**21.3.1:** ALA questions the inclusion of “Nationality of entity” within the Minimum Level of authority control. Despite the inclusion of the footnote indicating that “undetermined” may be used in accord with local or national policies, this may be viewed unfavorably as an example of the rules becoming more complex, rather than simpler.

The text for “see also” references given here is too broad for this level.

**21.3.2:** The text for general notes given here is too broad for this level.