TO: Joint Steering Committee
FROM: Jennifer Bowen, ALA Representative
SUBJECT: RDA Area 4 Simplified Rules (5JSC/LC/2)

ALA appreciates the efforts of the Library of Congress to offer simplified rules for inclusion in the new code. We have several specific concerns, however, about the LC proposal, and about Area 4 in general.

Published vs Unpublished

ALA continues to see a need to distinguish between published and unpublished materials, and would like to see more discussion of how this distinction can best be addressed within RDA. We suggest that the terms “published” and “unpublished” be considered for inclusion in the glossary. The distinction should also be addressed within the rules themselves for Area 4 to aid in the understanding of these rules. As we expressed in 5JSC/AACR3/I/ALA response (p. 28–29), we support the inclusion of place and date of production in the description of unpublished resources where applicable.

Comments on Specific Rules in the LC Proposal

A1.4C. Place of Publication

1. Multiple places of publication (Note: these comments also apply to A1.4D regarding multiple publishers)

   ALA is concerned that not enough guidance is presented in A1.4C and A1.4D when two places of publication and/or two publishers appear on an item and a cataloger wishes to transcribe them. We accept the idea that the recording of multiple places of publication and multiple publishers should be governed in part by guidelines for Levels of Description (and by a library’s cataloging policies based on those guidelines). However, 5JSC/ACOC rep/1 does not address the issue in enough detail to provide guidance. Neither the Minimum nor the Standard level of description in that document require the recording of multiple places/publishers, so the cataloger is left with no instructions that even suggest that multiple places/publishers may be recorded, or how to record them. The rules as proposed seem to assume that only one place or publisher appear on the item, although this is not explicitly stated. We propose the inclusion of the words “first named” in each rule.

   We propose the inclusion of an option under each rule that would briefly clarify the situation, without adding excessive detail back into the rules (ALA’s additions to the LC proposal highlighted in blue).
2. The LC proposal for A1.4C includes as its final paragraph an optional provision to supply the actual place of publication in square brackets in certain circumstances. ALA would prefer that this paragraph not be optional, as the comparable rule in AACR2 (1.4B6) is currently not optional. Our revision is included below.

A1.4C. Place of publication. Transcribe the first named place (local city/town) and its larger jurisdiction (if any) as they appear on the resource. If the place is uncertain or unknown choose the appropriate option as follows:

- **Local place not in resource but certain.** Supply the local place name in square brackets.
- **Local place uncertain.** Supply in square brackets a probable local place name followed by a question mark.
- **Local place unknown but larger jurisdiction probable.** Supply in square brackets the probable larger jurisdiction (e.g., state, country) followed by a question mark.
- **No place known or probable.** Supply in square brackets the phrase *place unknown.*

*Optionally,* to help a library user to identify the place of publication when the place on the resource is known to be fictitious, is given in an unusual form, or is not the only place with that name, also supply in square brackets the actual place of publication, the conventional name of the place, or the name of the larger jurisdiction, respectively.

*Optionally,* for *early printed resources* or according to the policies of the cataloguing agency, record places of publication beyond the first in the order in which they appear. If second or subsequent places are omitted, add *[etc.]*.

A1.4D. Name of Publisher

1. Multiple publishers: see comments above under A1.4C paragraph 1. Our proposed revision to the LC proposal follows below.

2. The LC proposal does not include instruction for the situation when no publisher appears on the resource but its name is known. We propose that this be added.

3. The LC proposal does not include an option to include a statement of function of publisher, distributor, etc. We propose that this be added.

A1.4D. Name of publisher. Transcribe the name of the first named publisher as it appears on the resource. When no publisher appears, choose the appropriate option as follows:

- **No publisher on resource but certain.** Supply the name of the publisher in square brackets.
No publisher on resource but a distributor is named. Transcribe the name of the distributor as it appears on the resource. In so doing, transcribe its associated place in accordance with A1.4C.

No publisher or distributor. Supply in square brackets the phrase publisher unknown.

Manufacturer. Transcribe a manufacturer and its associated place only when there is no publisher or distributor recorded; record these data after the date.

Optionally, add to the name of the publisher, distributor, etc., a term that clarifies the role of the publisher, distributor, etc.

For early printed resources, apply the following: 1) if the printer appears on the resource as part of the publication information, record the name as part of the publisher element; 2) optionally, if the printer is named separately and the printer can clearly be distinguished from the publisher or bookseller, record the printer (and its associated place) after the date.

Optionally, for early printed resources or according to the policies of the cataloguing agency, record publishers, distributors, etc., beyond the first in the order in which they appear. If second or subsequent publishers, distributors, etc., are omitted, add [etc.].

A1.4E. Date

Dates for Published Resources (A1.4Ea)

ALA notes that the LC proposal incorporates the rare materials rule from AACR2 into the general rule, and we support this change. However, we also see a need for a further option for early printed resources to transcribe the entire date (not just the year) as it appears on the resource – this would also affect A1.4Eai below.

Dates not in Western-style Arabic numerals (A1.4Eai)

1. ALA constituencies reported considerable confusion over the wording “such numerals” in this part of the rule, and ALA recommends a revision to this wording to clarify this.

2. There was some disagreement within ALA concerning the phrase “as needed for comprehensibility” and some questioned whether there would in fact actually be situations when adding the date in Arabic numerals wouldn’t be needed for comprehensibility. However, there was also concern that requiring the addition of the Arabic date might be confusing when transliterating a record, especially from Hebrew and Arabic scripts, as it would result in different directional data (right-to-left in the original date vs. right-to-left in Arabic numerals) transcribed in one area. If the
option is retained in this rule, we question whether it might be appropriate to reword this rule and format it to follow the format of other optional provisions in the rules.

3. The Association of Jewish Libraries (AJL) and the ALA Committee on Cataloging: Asian and African Materials (CC:AAM) have both noted their concern that the guidance in this rule be appropriate when providing a romanized transcription. It will be important that the general rules for “Language and Script of the Description” be compatible with the wording of this rule to prevent confusion among catalogers who are providing romanized transcriptions. In general, AJL and CCAAM are concerned that options be available not only for romanizing dates according to approved romanization tables, but also for recording dates using Arabic numerals in romanized transcriptions in situations where it would simply be too difficult to provide a transcription for original script numerals. In either case both groups see a need to avoid applying the provisions of A1.4E as written in these situations.

Dates not of the Gregorian or Julian calendar (A1.4Ea(ii))

1. CC:AAM has requested that the JSC consider the need to optionally include an indication of the kind of calendar or designation of an era when recording a date that is not of the Gregorian or Julian calendar. Some suggested wording is included below for possible discussion.

2. An option is needed for early printed resources for situations where the date is given for a calendar that does not begin on January 1. Suggested wording included below.

3. While in general ALA has not suggested new examples for these rules, we would like to offer the two examples below in non-Roman scripts and request that they be forwarded to the JSC Examples Group for consideration. We would welcome the inclusion of additional examples in other languages and scripts as well.

No Publication Date on the Resource (A1.4Ea(iii))

1. ALA questions whether this rule provides sufficient guidance for recording dates for serials and integrating resources when the first issue/iteration is not available.

Unpublished resources or assembles collections (A1.4Eb)

1. ALA suggests that a range of dates may often be appropriate for assembled collections, and suggests a revision below.

A1.4E. Date.

a) For published resources, transcribe the date in which the resource was published as it appears on the resource, usually only as year(s).
Optionally, for early printed resources, transcribe the date of publication or printing, including the day and month, as it appears on the resource.

i) Date not in Western-style Arabic numerals. Add the year(s) in Western-style Arabic numerals in square brackets as needed for comprehensibility.

Optionally, for early printed resources, add the day and/or month in Western-style Arabic numerals in square brackets.

ii) Date not of the Gregorian or Julian calendar. Follow it with the year(s) of the Gregorian or Julian calendar in square brackets.

Japanese example: ..., 平成七 [1995]
..., Heisei 7 [1995]

Hebrew example: . תשנ"ב , ...
..., 762 [2001 or 2002]

Optionally, include an indication of the kind of calendar or the designation of era.

Optionally, for early printed resources, when the year of publication is based on a calendar in which the year does not begin on January 1, and the publication is known to have been published in the following year according to the modern calendar, supply the later year in square brackets.

iii) No publication date on the resource. Record a date in the following order of preference: copyright date (indicated as such; use the latest if there is more than one); date of manufacture (indicated as such); supplied date in square brackets; approximate date in square brackets.

b) For unpublished resources or assembled collections, record the date of production or assembly, as a year or range of years.