

**To:** Joint Steering Committee for Revision of AACR  
**From:** Canadian Committee on Cataloguing  
**Subject:** **Rule proposals for archival and manuscript resources**

CCC would like to extend its appreciation to the Library of Congress in preparing this detailed document addressing archival and manuscript resources. The proposal was reviewed by the Canadian Committee on Archival Description (CCAD).

In reference to the introductory comments “to direct readers to *DACS* and other authoritative sources for more detailed instruction on archival resource cataloguing,” CCC would like to emphasize that as a multinational code such directional references should also take cognizance of other international and national archival standards, including the *ISAD(G)* and the Canadian standard, *Rules for Archival Description (RAD)*.

While we recognize that many of the Chapter 4 rules in AACR2 are being generalized, we also acknowledge the differences in treatment of archival resources. If rules for archival control are incorporated into *RDA*, there are distinctions that must be accommodated or addressed. Some of our concerns include:

- rules applicable to archival resources be written in language that is profession-neutral (i.e., not use “archivists”) and be rephrased in terms of archival practice
- use of the term “fonds” in *RAD* when referring to an organic collection vs. an artificial collection
- the use of primary access point versus any and all access points. How is primary access point determined for an archival resource? Who is creator? Is it a resource of mixed responsibility even though it may be assembled by an individual? Is this title vs. creator (i.e., assembler) as primary access point? For example, *RAD* does not apply the primary access point criterion.

**Specific comments:**

**11.2.2 (Number of records):** The title is misleading as the archival view of “number of records” is different from the bibliographic interpretation. What is being discussed is the concept of “Level of description” of which two types are elaborated: single-level description and multilevel description. Multilevel description within archival standards such as *RAD* and *ISAD(G)* is well-established. The text could profit from a re-examination of the pertinent parts of these standards as well as principles 4 and 7 of *DACS*. The term “single-level descriptions” introduced in *DACS* needs further discussion. The *RAD* term, “discrete items,” refers to items that do not form part of any larger fonds or collection. This and the related concept of “single item” and that of single-level description are not one and the same.

**12.1 (Title):** The rules for title pertain more appropriately to higher levels of archival description, e.g., at the fonds (collection) and series levels. At lower levels of description, such as the file or item level, supplied titles often indicate more the nature, subject, etc., of the resource being described, particularly within the context of multilevel description. The rules as currently written

could result in considerable repetition or redundancy of the name segment (name of unit) in subordinate levels of description, e.g., at the series or file levels. Additionally, at lower levels of description, particularly at the item level, resources are more likely to carry formal titles.

**12.7 (Date of publication, distribution, etc.)**

**(Date of creation or date of record-keeping activity):** We note that although the date of record-keeping activity is mentioned in the rule, there is no instruction as to how it is to be distinguished from the dates of creation nor the order of its recording.

**(Single dates):** *RAD*'s practice differs from *DACS* in the transcription of dates.

**12.9 (Reference Code):** This is not a descriptive element and does not belong here. As an added comment, the MARC encoding, or any coding, of the examples is not appropriate for *RDA*.

**14.10 (Administrative/Biographical note):** This element contains information about the creator of the resource and not of the resource itself and does not, therefore, fit in Part I. This is recognized in *DACS* where the substantive rules are in Part II – Describing Creators.

**16.2 (Provenance):** The title is misleading; “provenance” (according to *DACS*) is defined as the relationship between records and the organizations or individuals that created, assembled, accumulated, and/or maintained and used them in the conduct of personal or corporate activity. This rule, however, refers only to the immediate source of acquisition and other acquisition related details and custodial history.

The issues raised above, while requiring further discussion and resolution, do not diminish the important aim of providing general rules for the description of archival resources in *RDA* in a manner consistent with internationally-accepted principles of archival description. Doing so can increase dialogue and understanding between the library and archival professions, further standards interoperability, and improve access to documentary heritage collections. We support that wherever possible *RDA* incorporates rules for archival description. However, we have some concerns regarding the allotted timeframe with which to address the issues raised.