TO: Joint Steering Committee for Revision of AACR  
FROM: Barbara B. Tillett, LC Representative  
SUBJECT: Rule proposals for archival and manuscript resources

The following is a revised proposal based on comments received from the constituents to date. It is intended to serve as the “talking paper” for the October JSC meeting. It also reflects our response to the comments and suggestions made by the other JSC constituents and should be read in conjunction with the JSC Secretary’s response table, “Responses to 5JSC/LC/3.” If you use Word’s “Track changes” you will see the additions and changes made to our original proposal.

In recognition of the obsolescence of AACR2 Chapter 4 and the emergence of ISAD(G) (International Standard for Archival Description), DACS (Describing Archives: a Content Standard), The IASA cataloguing rules: a manual for the description of sound recordings and related audiovisual media, and RAD (Rules for Archival Description), the Library of Congress offers the following concepts, principles, rules, and examples (primarily based on ISAD(G), DACS, and RAD) to include in RDA. This proposal has been developed in consultation with experts in several divisions at the Library of Congress that catalog archival and manuscript resources: the Manuscript Division, the American Folklife Center, and the NUCMC Team of Special Materials Cataloging Division.

We also note the following source might be added to our recommended listing of other authoritative standards:

LC recognizes that the style and format of the rules will be adjusted by the RDA Editor and in some cases may fold into more generalized rules, depending on future drafts, and expect the editorial discretion in best using the agreed upon content. Our intention was to keep the rules at the level of a general cataloger’s needs with references in the RDA General Introduction and in other relevant locations throughout the rules to direct readers to ISAD(G), DACS, RAD, and other authoritative sources for more detailed instruction on archival resource cataloging (identified below).

Refer to response table.
The arrangement below follows the rule numbering suggested in the Prospectus.

RDA 11.2 Setting up the description

Refer to response table.

RDA 11.2.1 Identifying Archival Resources

Move definition of archival resources to glossary.

Archival resources consist of materials that an institution chooses to control archivally using principles/standards defined by the archival community. These materials are organically created, accumulated, and/or used by a person, family, or organization in the course of the conduct of affairs and preserved because of their continuing value. These resources may be aggregations of documents or discrete items. These resources may also be collections acquired and assembled by archival repositories, individuals, and other institutions that do not share a common provenance or origin but that reflect some common characteristic, for example, a particular subject, theme, or form.

Once a resource has been identified as an archival resource, the cataloger may turn to a manual for the processing of archival resources, for instance, ARRANGING AND DESCRIBING ARCHIVES AND MANUSCRIPTS (Archival Fundamentals Series II), written by Kathleen D. Roe, published by the Society of American Archivists in 2005.

Refer to response table.

RDA11.2.2 Number of records: Determining archival resource to be described

When describing “multilevel descriptions” in RDA, we request that the editor include mention of the exception for archival resources, where “multilevel description” has a different meaning than for RDA. We suggest adding a reference in RDA to see ISAD(G) for multilevel descriptions in the archival sense.

Refer to response table.

RDA 12

Refer to response table.

RDA 12.1 Title

Deleted: the documents

Deleted: Arrangement and description of archival resources are closely intertwined, but it is possible to distinguish between them in the following way. Arrangement refers to the intellectual and/or physical processes of organizing documents in accordance with accepted archival principles, as well as the results of these processes. Description refers to the creation of an accurate representation of the archival resource by the process of capturing, collating, analyzing, and organizing information that serves to identify an archival resource and to explain the context and records systems that produced it, as well as the results of these processes. Two principles form the basis for archival arrangement and description: the principle of provenance and the principle of original order. The principle of provenance means that the records that were created, assembled, accumulated, and/or maintained by an organization or individual must be represented together, distinguishable from the records of any other organization or individual. The principle of original order means that the order of the records that was established by the creator should be maintained by physical and/or intellectual means whenever possible to preserve existing relationships between the [1]

Single-level descriptions can describe archival resources at any level. They can, however, only describe those resources at one explicitly articulated level. Examples of single-level [2]
Non-selfdescribing resources such as archival resources generally do not have formal titles, and when they do, the formal title can be misleading or inadequate. Supply titles, composing a brief title that uniquely identifies the resource. Supplied titles generally have two parts:

1. A name segment consisting of the name of the creator(s) or collector(s). Record the name(s) of the person(s), family (families), or corporate body predominantly responsible for the creation, assembly, accumulation, and/or maintenance of the resource.
2. A term indicating the nature of the resource being described. For a resource consisting of three or more forms of documents created, assembled, accumulated, and/or maintained and used by its creator, supply the word “fonds” or “records” for resources of a government agency or other corporate body; supply the word “fonds” or “papers” for resources of a person or family. When describing an intentionally assembled collection, supply the word “collection.”

Supplied titles at subordinate levels in a multi-level description should not repeat information inherited from higher levels.

Do not enclose supplied titles for archival resources in square brackets. (Adapted from DACS 2.3, 2.3.3, and 2.3.4)

Examples:
- Bessye B. Bearden papers
- St. Paul African Methodist Episcopal Zion Church records
- Semans family papers
- William Gedney photographs and writings
- Andrew Jackson letter
  - Articles, addresses, reviews
  - Series in the G. Bilson fonds
  - Forestry and conservation activities
  - Series in the R. St. Barbe Baker fonds

Optionally, record a topical segment to indicate the subject, theme, or form of the resource being described.

Examples:
- Caroline and Erwin Swann collection of caricature and cartoon
- Paul Bowles Moroccan music collection
- Collection on Isadora Duncan
  - Collection is about Isadora Duncan, she is not the collector
- Collection of Robert Browning materials
  - Collection is materials by Robert Browning, he is not the collector

Refer to response table.
RDA 12.7 Date of publication, distribution, etc.

For resources in an unpublished form (e.g., manuscripts, unpublished microforms, nonprocessed sound recordings, unedited or unpublished film or video, stock shots, unpublished digital resources, art originals) record the date of production (creation, inscription, manufacture, recording, record-keeping activity, etc.). Record the year or years . . .

**Add to glossary:** Date(s) of record-keeping activity are the dates during which the unit being described was created, assembled, accumulated, and/or maintained and used as a unit in the conduct of affairs by the organization or individual responsible for its provenance. They are distinct from the dates of creation of individual documents. Although the dates of record-keeping activity may often coincide with the dates of creation, the date types differ in two ways. First, the date(s) of record-keeping activity refer to the dates of a number of interrelated activities (including, but not limited to, creation and accumulation); and secondly, the activities pertain to the unit as a whole as opposed to individual documents. Records may be accumulated and used for a current purpose long after they were originally created, for example, where much earlier records are assembled to support an investigation or a legal action.

Incorporate following rules in general rules:

**Inclusive dates.** If the resource being described spans a period of time, always record the inclusive dates; that is, the earliest and latest dates of the resource or activity in question. (Adapted from DACS 2.4.7)

Example: 1849-1851

**Bulk dates.** Optionally, where the dates pertaining to the majority of the documents in the unit being described differ significantly from the inclusive dates, provide predominant or bulk dates. Specify them as such, preceded by the word “predominant” or “bulk.” Never provide predominant or bulk dates without also providing inclusive dates. (Adapted from DACS 2.4.10)

Example: 1785-1960, bulk 1916-1958

**Single dates.** If the date of a resource falls within a single year, record that year or a more specific date therein. (Adapted from DACS 2.4.13 and 2.4.14)

Note: Practice varies for the order of date elements, but the cataloguing agency should choose one order to use consistently (e.g., year, month, day or day, month, year as shown in examples). We’d like the editor to include a note to this effect.

Example: 1906 March 17
Undated. If no date can be found on or in the resource itself or determined from any other source, estimate the nearest year, decade, century or other interval as precisely as possible. It is recommended that terms reflecting estimation be spelled out rather than abbreviated. When it may be misleading to record an estimated date, use “undated.” (Adapted from DACS 2.4.15 and 2.4.16)

Examples:
- probably 1867
- approximately 1952–1978
- circa 1952–circa 1978
- before 1867

Refer to response table.

RDA 12.9 Resource identifier

Reference Code
For archival resources, provide a reference code, which is a unique identifier for the unit being described. The identifier may consist of three subelements: a local identifier, a code for the repository, and a code for the country. The repository identifier and the country identifier codes are required only for purposes of consortial, national, or international exchange. (Adapted from DACS 2.1)

Examples:
- 008 bb 941228119461998cau eng dcbcIaa (country code)
- 040 bb ‡a CUS ‡e dacs ‡c CUS (repository code)
- 099 bb MSS 0112 (local identifier)

The national repository codes are constructed in accordance with ISO 15511.

Refer to response table.

RDA 13.2 Extent

Add these examples to a general rule:

Examples:
- 45 linear feet
- 5,321 items
- 2 scrapbooks.

Deleted: This element indicates the extent and the physical and/or technical nature of the archival resource being described and consists of two parts, a number (quantity) and an expression of the extent or material type. Repositories should establish a consistent method of articulating statements of extent. (Adapted from DACS 2.5 Purpose and Scope)

¶ Record the numerical quantity associated with each expression of physical extent as linear or cubic measurements, number of containers or carriers, or number of items. Terms reflecting physical extent should be spelled out rather than abbreviated. (Adapted from DACS 2.5.4 and footnote 32)
1 sound cassette (90 min.) : analog, mono.
7 videocassettes of 7 (VHS) : sd., col. ; 1/2 in.

Incorporate in general rules:

**Multiple statements of extent**

If a parallel expression of extent is required or desirable, add this information in parentheses. (Adapted from DACS 2.5.7)

Example:

89.5 linear feet (150 boxes and 109 oversize folders)
2,400 folders (12 linear feet)

Optionally, provide multiple statements of extent for various material types. (Adapted from DACS 2.5.8)

Example:

12 linear feet of textual materials, 68 photographs, 16 architectural drawings

Refer to response table.

**RDA 13.3 Dimensions**

Record dimensions of materials, containers, or objects using the metric system or imperial system of measurement in accordance with best practices developed for the specific types of materials described, if considered to be important. Add a word to indicate which dimension is being given, if necessary. If multiple dimensions are given, give them as height x width x depth. (From AACR2 10.5D1; not taken from DACS)

Example:

various sizes, 8 x 10 in. and smaller
in container, 22 x 20 x 16 cm

Refer to response table.

**RDA 13.6 Alternative formats**

**Existence and location of copies**
Provide information about the existence and location of copies or other reproductions of the resource being described. (Adapted from DACS 6.2)

Examples:
- Also available on videocassette.
- Diaries available on microfilm for use in repository alone.
- Digital reproductions of the Christie family Civil War correspondence are available electronically at: http://www.mnhs.org/collections/christie.html.

Existence and location of originals
Provide information about the existence and location of originals when the resource being described consists of copies and the originals are not held by the repository. (Adapted from DACS 6.1)

Examples:
- Originals are in the Minnesota Historical Society.
- Original letters in the collection of the Watkinson Library, Trinity College, Hartford, CT.

Refer to response table.

RDA 14.2 Nature, scope, etc.
Archival practice combines Nature, scope, etc. and Summary. For archival resources provide information about the nature of the resource and activities reflected in the resource being described to enable users to judge its potential relevance. This may include information about any or all of the following, as appropriate: the documentary form(s) or intellectual characteristics of the resource being described; the function(s), activity(ies), transaction(s), and process(es) that generated the resource being described; the time period(s) covered by the intellectual content or subject of the resource being described; geographic area(s) and places to which the resource pertains; subject matter to which the resource pertains; and any other information that assists the user in evaluating the relevance of the resource. (Adapted from DACS 3.1)

Examples:
- Minutes, membership and dues records, journals, daybooks, forms, circulars, and correspondence from a carpenters' union local in St. Paul, Minnesota. Correspondence and minutes contain data on the union's formation, internal affairs, assessments and benefits, social functions, organizing activities, relations with other local and national unions, and political participation. There is also information on St. Paul labor issues, hiring practices, boycotts, strikes, and employers' attitudes toward unions. Present also are minutes (1914-1923) of Millmen's Local Number 1868, which affiliated with the carpenters in 1923.
Letter presented by twenty-one Oneida Indians, signed with their marks, requesting that Jasper Parrish pay them the amount they are owed for serving in the War of 1812. They state that they are aware that he received the money three months previously and they are anxious to settle the account.

Refer to response table.

RDA 14.3 Language and script

Archival description requires the recording of the language(s), script(s), and symbol systems employed in the resource being described, particularly as they may affect its use. Additionally, language and script information may be represented using the appropriate ISO codes. (Adapted from DACS 4.5 Purpose and Scope)

Examples:
- Resource entirely in English.
- Collection is predominantly in Vietnamese; materials in English are indicated at the file level.

Refer to response table.

RDA 14.6 Contents

System of arrangement. Optionally describe the current organization within the archival resource in terms of its various aggregations and their relationships. This information may also be conveyed in the Nature, scope, etc. element or in related descriptions of the resource. (Adapted from DACS 3.2.2)

Example:

 Optionally give information about the arrangement of component files or items. (Adapted from DACS 3.2.3)

Example:
- This subseries is arranged alphabetically by the geographic location of the photograph and then by the item number assigned by the photographer.
Refer to response table.

RDA 14.7 Related content

**Related materials**  Optionally, indicate the existence and location of archival resources that are closely related to the resource being described by provenance, sphere of activity, or subject matter, either in the same repository, or in other repositories, or elsewhere. (Adapted from DACS 6.3)

Examples:
Related materials providing visual documentation of racially segregated facilities may be found in the following collections in this repository: Birmingfind Project Photographs and Common Bonds Project Photographs.

Harold C. Conklin's map manuscripts, personal papers, and field notes are held at Yale University Library.

Motion picture films and sound and video recordings transferred to Library of Congress Motion Picture, Broadcasting and Recorded Sound Division.

Refer to response table.

RDA 14.10 Administrative/Biographical note.

For archival collections of organizational records or personal papers, provide an administrative history or biographical note in order to identify the organization, family, or person primarily responsible for creating or accumulating the resource. Provide a brief summary of the most relevant aspects of the corporate body’s existence, typically including name and name changes, dates of existence, main functions or activities, and geographic location. Provide a brief summary of the most relevant aspects of a person’s or family’s life, typically including name and name changes, dates, profession, and geographic locations. Information in this note should not necessarily be restricted to name and name changes, dates of existence, functions or activities, professions, and geographic locations reflected in the resource being described, but may include any information relevant to the understanding of the life, activities, and relationships of the person or family, or of the corporate body's functions, activities, and relations with other corporate bodies. Alternatively, record this information in an authority record. (DACS 10.15 and 10.26)

Examples:
The American Missionary Association was established in 1846 as an interdenominational missionary society devoted to abolitionist principles. From its beginning the major support for the Association came from Congregationalists, but it also received support from Wesleyan Methodists, Free Presbyterians, and Free Will Baptists. In 1865 it became the official agency of the Congregational churches for conducting educational work among the freedmen. Support from other
denominations gradually declined until the Association became exclusively a Congregational organization.

Frederick Reines (1918-1998) was a particle physicist, Nobel laureate, and educator internationally recognized for his verification of the existence of the neutrino and investigation of its properties.

The Ker family was related to the Baker and other families of Mississippi and Louisiana. Prominent family members included John Ker (1789-1850) of Natchez, Miss., and Concordia Parish, La., who was a surgeon, planter, 1830s Louisiana state senator, and vice president of the American Colonization Society; his wife Mary Baker Ker (d. 1862); their daughter schoolteacher Mary Susan Ker (1838-1923), who taught at the Natchez Institute; and two grandnieces whom Mary Susan raised: Matilda Ralston (Tillie) Dunbar (fl. 1890s-1960s), who clerked in a Fayette, Miss., bank, and Catharine Dunbar Brown (d. 1959), who first taught at the Natchez Institute and later owned a rare book and antiques store.

Refer to response table.

RDA 15.1 Terms of availability

Existence and location of originals and Existence and location of copies placed under RDA13.6

Alternative formats.

Refer to response table.

Name and Location of Repository

For archival resources, the name and location of the repository that holds the resource being described is a required element. Record the name of the repository, including any parent bodies. Include the mailing address and other contact information if desired. (Adapted from DACS 2.2 Purpose and Scope, 2.2.2, and 2.2.3)

Example:
Alabama Department of Archives and History. 624 Washington Avenue, Montgomery, AL 36130-0100

[This element may belong elsewhere in RDA but is an essential element in archival description.]

Refer to response table.

RDA 16.2 Immediate source of acquisition or transfer,
Immediate source of acquisition or transfer.

Optionally, record the source(s) from which the resource being described was acquired, the date(s) of acquisition, and the method of acquisition, if this information is not confidential. (Adapted DACS 5.2)

Examples:

Received from Charles Edward Eaton, Chapel Hills, N.C., in a number of installments beginning in 1977.


RDA 16.2.2 Custodial history

Optionally, record the successive transfers of ownership, responsibility, or custody or control of the resource being described from the time it left the possession of the creator until its acquisition by the repository, along with the dates thereof, insofar as this information can be ascertained and is significant to the user’s understanding of the authenticity of the resource. (Adapted from DACS 5.1)

Example:

Franklin Delano Roosevelt's gubernatorial records were initially deposited at the Roosevelt Presidential Library following his death. In 1982 they were returned by the Roosevelt Library to the New York State Archives.

Refer to response table.

RDA 16.3 Restrictions on access and use

Restrictions on access

Record all restrictions on access to the resource, including the nature and duration of the restriction. If there are no restrictions, state that fact. (Adapted from DACS 4.1)

Examples:

The collection is open for research use.

Researchers must receive prior written permission to use the collection from the Trustees of the Kenneth Winslow Charitable Remainder Unitrust. The collection is partially processed. Please contact Special Collections for more information.

Access is restricted; consult repository for details.

Restricted access according to signed release form and related notes.

Originals not available; consult repository for details.

Restrictions on use

Record all restrictions to use of the resource, including the nature and duration of the restriction. (Adapted from DACS 4.4)

Examples:
Copyright retained by the donor during her lifetime, at which point it will revert to the Regents of the University of California.

Literary rights of Solon J. Buck have been dedicated to the public.

Donor permission is required for public screening of films in this collection.

Permission of the collector is required to cite, quote, or reproduce.

Refer to response table.

RDA 16.4 Appraisal and accrual

Where the retention or destruction of materials has a bearing on the interpretation and use of the resource being described, provide information about the materials destroyed or retained and provide the reason(s) for the appraisal decision(s), where known. (Adapted from DACS 5.3)

If known, record whether or not further accruals are expected. When appropriate, indicate frequency and volume. (Adapted from DACS 5.4)

Examples:
Appraisal criteria for file retention included the presence of attorney's handwritten notes, substantiating correspondence, depositions, and transcripts, which are seldom or never present in the Supreme Court's files.

Originals destroyed after microfilming, 1981.

The repository continues to add materials to this collection on a regular basis.

Refer to response table.

Part II of RDA: RDA 22.1 Primary access point

Various relationships exist between archival resources and the organizations or individuals associated with them. The primary one is responsibility for the creation, assembly, accumulation, and/or maintenance and use of the resource being described. Depending on the nature of the resource, one may express that relationship by various terms: author, collector, artist, cartographer, photographer, custodian, etc., or, more generically, as the provenance of the resource. (Adapted from DACS, Chapter 9).

Examples:
Hamilton, Alexander, 1757-1804
Smith, John, 1891-1976, interviewee
Refer to response table.

Part III of RDA: Access Point Control

The creators of archival resources, as well as the resources themselves, must be described.

If the principle of provenance is fundamental to the arrangement and description of archival resources, it follows that the provenance, or the creator(s), of archival resources must be described as well. Except in cases where the creator or collector is truly unknown, this principle means that the creator or collector of the resource must be identified and included in (or linked to) the description of the resource. Moreover, the functions and activities of the creator(s) that produced the archival resource must be described. Finally, standardized access points must be provided that indicate not just the primary creator but also the relationships between successive creators, for example, parts of a corporate body that has undergone reorganization(s). (Adapted from DACS, p. xv, Principle 8)

Once formulated, this information may be presented to the user in either of two ways. Traditionally, the names of creators and contextual information about them are incorporated directly into archival descriptions, both in catalog records and in finding aids. Alternatively, information about creators of archival resources can be captured and maintained in a separate system of archival authority records that are linked to the archival descriptions rather than being embedded within them. This approach reflects the model created by the International Council on Archives where the General International Standard for Archival Description (ISAD(G)) provides rules on description and the International Standard Archival Authority Record for Corporate Bodies, Persons and Families (ISAAR(CPF)) governs the creation of information about creators. See DACS, Chapter 11 for guidance on the construction of archival authority records based on the structure of ISAAR(CPF). Archival authority records may be encoded using the Encoded Archival Context (EAC) XML DTD. (Adapted from DACS Part II Describing Creators)

Refer to response table.

Other elements for RDA

Finding aids element

Record information about any existing finding aids that provide information relating to the context and contents of the resource being described. As appropriate and available, include information about the type (e.g., list, index, guide, calendar, etc.), medium (e.g., cards, electronic, etc.), and content (e.g., names of correspondents, subjects, etc.) of the finding aid, the number or other identifier of the finding aid (if any), level of control, any relevant information about its location or availability, and any other information necessary to assist the user in evaluating its usefulness. Include finding aids prepared by the creator (e.g., registers, indexes, etc.) that are part of the resource being described. (Adapted from DACS 4.6.2)

Examples:
Box list available.

Electronic finding aid available via the Internet in the Online Archive of California; folder level control: http://www.oac.cdlib.org/findaid/ark:/13030/kt8z09p8pd.

An item list, a file of calendar sheets, and indexes by subject, type of author, and (selectively) place written from are available in the repository; filed under M316.

A Marriage Index database of information from these records is maintained by the Ulster County Clerk's Office Archives.

Refer to response table.

Ancient, Medieval, and Renaissance Manuscripts (AACR2, 4.7B23)

DACS does not address current 4.7B23 Ancient, medieval, and Renaissance manuscripts. The issue of whether or not the specific terms and subrules are still appropriate should be referred to the appropriate constituents, users of Descriptive Cataloging of Ancient, Medieval, Renaissance, and Early Modern Manuscripts (AMREMM).

Refer to response table.
Arrangement and description of archival resources are closely intertwined, but it is possible to distinguish between them in the following way. **Arrangement** refers to the intellectual and/or physical processes of organizing documents in accordance with accepted archival principles, as well as the results of these processes. **Description** refers to the creation of an accurate representation of the archival resource by the process of capturing, collating, analyzing, and organizing information that serves to identify an archival resource and to explain the context and records systems that produced it, as well as the results of these processes. Two principles form the basis for archival arrangement and description: the principle of provenance and the principle of original order. The principle of provenance means that the records that were created, assembled, accumulated, and/or maintained by an organization or individual must be represented together, distinguishable from the records of any other organization or individual. The principle of original order means that the order of the records that was established by the creator should be maintained by physical and/or intellectual means whenever possible to preserve existing relationships between the documents and the evidential value inherent in their order. (Adapted from DACS p. xi-xv, Principles 1-7)

Archival resources may be described at any level, from accumulations commonly referred to by archivists as collections, record groups, fonds, or record series, to single items, and any level in between. The archivist must determine the level that is being described, and then determine whether to provide single-level or multilevel description. (Adapted from DACS Introduction to Describing Archival Material)

**Single-level descriptions** can describe archival resources at any level. They can, however, only describe those resources at one explicitly articulated level. Examples of single-level description include a MARC 21 record not linked to other MARC 21 records or a METS record for a description of archival resources. (Adapted from DACS 1)

**Multilevel descriptions** can describe archival resources beginning at any level (e.g., collection level, series level) and must include at least one sublevel, such as a file or item. Levels of description correspond to levels of arrangement. Relationships between levels of description must be clearly indicated and information provided at each level of description must be appropriate to that level. Examples of multilevel description would be a collection inventory or register, which may be encoded using EAD, or multiple linked MARC 21 records. (Adapted from DACS 1)

**Availability of archival originals, when not held by the repository**
For archival resources provide information about the availability of originals when the resource being described consists of copies and the originals are not held by the repository. (Adapted from DACS 6.1)

Examples:

- Originals are in the Minnesota Historical Society.

- Original letters in the collection of the Watkinson Library, Trinity College, Hartford, CT.
Availability of copies of archival copies or reproductions

For archival resources provide information about the availability of copies or other reproductions of the resource being described when they exist for use in a repository. (Adapted from DACS 6.2)

Examples:

Also available on videocassette.

Diaries available on microfilm for use in repository alone.

Digital reproductions of the Christie family Civil War correspondence are available electronically at: http://www.mnhs.org/collections/christie.html.

[Note: The existence and location of originals and existence and location of copies have been placed under RDA 13.6 Alternative formats and availability of originals and copies under RDA 15.1 Terms of availability. However, in DACS the concepts of the existence of originals located elsewhere and existence of copies are combined with availability and so the examples are the same in 13.6 and 15.1. LC is open to these rules being placed wherever they are appropriate in RDA.]