CILIP welcomes LC/6 and its proposals to cover family names in RDA. Although the immediate context may have been requests primarily from the archival community, CILIP notes that the inclusion of family names is consistent with FRBR Group 2 entities. The logic can therefore be relatively easily understood, with or without an archival perspective.

Combining the concept of “family” names with personal names does seem to sit a little awkwardly at times in this proposal. We are even unsure about retaining the phrase “personal author” - it clashes with “person”. Perhaps “domestic author” or some such term of that type would be better; the distinction being sought is that between groups related genetically from all other groups – “group” here can consist of a single person, so the genetic relationship is “self”, and logically overrides any other type of group consisting of one member. Corporate bodies, of course, can consist of a single person.

Logically, too, there might seem to be a closer fit with corporate bodies, although we note that LC does not favour that approach. As development of RDA progresses, it may be possible to see all three types of name (person, family, corporate) treated for their differences rather than their similarities. This may be closer to what LC is suggesting in its first paragraph.

For information, we offer the following extracts from the National Council on Archives Rules for the constructions of personal, place and corporate names (1997) [online version available at: http://www.archivesnetworkwales.info/ncarules/title.htm]:

2.1.1 Definition of a personal name

[relevant extract only]
For the purpose of the present Rules, the name of a family indexed as a unit is to be regarded as a personal name e.g. Harley family.

2.6.1 Definition of a family name

A family name is the name shared by a group of related individuals. Under the present Rules, the name of a family treated as a group is a personal name.

Read as a sequence of rules, the addition in this proposal of “or family” to every rule where family names might be relevant does seem excessive. However, the needs of the online version of RDA may make such repetition inevitable.
The whole issue of forms of heading for family names is clearly beyond the scope of this proposal, but in its fourth introductory paragraph LC raises the issue of groups such as dynasties, royal families, etc. CILIP notes, in passing, that the NCA rules (para. 2.6.4) state that:

- **title must be included**

and gives the following examples (the use of the vertical bar reflects NCA presentation, distinguishing different elements of the overall heading):

- **Stewart | family | Earls of Galloway**

On a similar theme, LC’s proposal for a non-unique approach to the form of heading for a family name does not accord with the NCA’s view (although it does, as the proposal makes clear, follow DACS). The following is another example taken from the NCA rules:

- **Lever | family | of Bolton, Lancashire**

CILIP believes the question of a non-unique approach will need to be looked at again at an appropriate point in the RDA development schedule. It does not think an approach from which differentiation is excluded to be the most helpful to users.

**Comments on specific rules**

21.4A2. It’s unclear what is being proposed in the case of a work etc. by two or three members of the same family. Is this treated as a work “of family authorship”, or would 21.6 take precedence?

21.6B1. The example is not, in itself, totally clear as a demonstration of the application of the rule concerned. It assumes that principal responsibility lies with Jefferson, i.e. that he was the writer, but this isn’t self-evident from the title (he could have been the recipient of letters from other members of the “Jefferson family”).

21.6C2. Since LC indicated in its introduction that it was not attempting to incorporate “rule of three” changes into this proposal, CILIP records purely for information the comment that this rule, as currently drafted, would not be considered adequate to a description of archives if it were to lead to responsible authors not being identified.