To: Joint Steering Committee for Development of RDA

From: Margaret Stewart, Chair, JSC

Subject: RDA: Resource Description and Access – Full Draft – Review by AFNOR Group CG46/CN357/GE6 (France)

These are comments on the full draft of RDA received from AFNOR Group CG46/CN357/GE6.

Full Draft of RDA
French comments on RDA
prepared by the AFNOR Group CG46/CN357/GE6 working on the evolution of the bibliographic description

General comments

Paragraph	Page	Comments
General comments		We're aware of the big amount of work done to develop RDA in close connection with the FRBR and FRAD models and we congratulate the JSC for that effort.

An ambiguity runs through the whole draft: is it a cataloguing code for the Anglo-American world (what seems to be asserted in paragraph 0.2) or is it a cataloguing code with a really international dimension ?
It seems that the JSC claims a sort of "Anglicization" of the spirit of RDA by prejudging the necessary translation for those who wish it. The problem is that it is not only a question of translating but also a question of adaptating the text (for example, replace "in English" by "en français", replace all the examples that are referring to English language by default as the cataloguing language by examples adapted to French language, etc.): this will emphazise the perception of rules with many alternatives not explicitly developed and will generate a work much heavier from translators; this will also lead to distorsions in the spirit of some rules (what induces us to say that this work is not as international as it is asserted).
In the prospect of a really international code, some rules should not be so detailed but give a generic frame. For example,
- the rules on legal works that refer to Anglo-Saxon law will have to be adapted in countries that follow another legal system
- the rules on the attributes (in 9.10 Country associated with the Person, 9.11 Place of residence or 9.12 Address) will have to be systematically corrected and adjusted in each context of cataloguing, according to national laws on the protection of private data.

It would be better to have a generic frame and no detailed rule.

Likewise the international standardized abbreviations intended for by ISBD for additions in the description such as: "i.e.", "s.l.", "s.n." should be maintained instead of being replaced by indications in English, in order to permit an international understanding of records.

Instructions remain that prescribe punctuation which is a matter of display, wheras RDA is intending to define the elements of information and not the prescribed punctuation associated with these elements.
In some cases, it would be better to define sub-elements instead of prescribing punctuation.

The analysis according to the FRBR$_{ER}$ entities and the new organization of the bibliographic information in attributes and relationships has been more completely achieved for the entity "Manifestation" (bibliographic description) than for the entities "Work" and "Expression".

In some cases, there is a confusion between the entities of Group 1 of the FRBR model, particularly in the examples.

Many instructions have decision left too much at the discretion of the "cataloguer" according to the actual terms of JSC's answers to some of

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Paragraph	Page	Comments
		the French comments on RDA of Spring 2008.
		We do not always rightly know where and how the listed informations are given in a record insofar as RDA wants to be independent from formats and display.
		Many definitions are tautological: for examples of some of them see 2.5.1.1, 2.7.1.1)
		The rule is too often inferred from the examples.
General comments on Examples		Examples should: - be more commented in order to be explicit and useful In fact, the comments that accompany the examples are not sufficiently explanatory for the case treated. - be presented in a clearer manner: the statement of the case should appear **before** the mention "FOR EXAMPLE" - be numbered to allow an easy referencing (particularly when more than one page of examples are illustrating the same case). In Section 6, examples should: - include the relationship designator (Section 6) - recall access points other than those covered by the case treated which have been established for the resource described; this could be done by way of a comment with a cross reference to the related paragraphs.

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Table of contents pages

Paragraph	Page	Comments
Table of contents pages : 2.15.2 Publisher's number for music& 2.15.3 Plate number for music		Why are these numbers thus set aside?
Table of contents pages : 6.10 Content type		"Content type" should be named "content form" in order to be in accordance with FRBR 4.3.2.
Table of contents pages : 19.3.2 other person or corporate body associated with a legal work & 19.3.3 Otehr person or corporate body associated with a religious work		Why are these two cases thus set aside?

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Chapter 0
Introduction

Paragraph	Page	Comments
0.2 Relationship to Other Standards for Resource Description and Access		"RDA is built on foundations established by the Anglo-American Cataloguing Rules (AACR) and the cataloguing traditions on which it was based. Other key standards used in developing RDA include the International Standard Bibliographic Description (ISBD),8 the MARC 21 Format for Bibliographic Data,9 and the MARC 21 Format for Authority Data." **Our comment** : The boundaries of RDA are explicitly limited to the AACR world. Why not foresee a more general dimension that would allow connecting the existing and compatible systems of cataloguing (ISBD, MARC, etc.) with the FRBR and FRAD models?
0.4.3.3 Relationships	p.7	"The data describing an entity associated with a resource should reflect all significant bibliographic relationships between that entity and other such entities." **Our comment** : The meaning of this 2nd indent that is not clear should be explicited. What exactly is referred to? To entities that make the subject of authority records ?
0.6.2 Section 1 : Recording attributes of manifestations and item	12	Typo The 11th entry of the list "Publisher''s name" has 2 apostrophs. Typo 14th entry of the list "…(… nor distributor **i,** if …): delete the "i" after "distributor".
0.6.2 Section 1 : Recording attributes of manifestations and item ****		In the core elements, should be considered the case of the manifestation of a musical expression that requires to transcribe two responsibilities: that of the work (creator) and that of the expression (performer).
0.6.2 Section 1 : Recording attributes of manifestations and item ****	12	Core elements : place of publication is optional **Our comment** : This rule is in accordance with FRBR but not with ISBD: place of publication is an important element for serials and should be mandatory for this category of resources (see our comment on 1.3).
0.6.3 Section 2: Recording Attributes of Work and Expression	12	In the case of a sound recording of a literay or musical work, the performer should obligatorily be transcribed in order to distinguish an expression (see also 1.3, 2.20.3 …)

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0.6.3 Section 2: Recording Attributes of Work and Expression	13	Core elements Add to the list : • Rite (for liturgical work)
0.6.3 Section 2: Recording Attributes of Work and Expression	13	"Content type" should be named "content form" in order to be in accordance with FRBR 4.3.2.
0.10.5 Units of measurement	20	Last indent, last line "Playing speeds for analog tapes, however, are recorded in inches per second." **Our comment** : Why this exception for magnetic tapes in regard to the other types of media? In ISBD playing speed for a magnetic tape is indicated according to the metric system, for example "19 cm/s". Inches are used for width of videocassettes, for example "(1/2 p, 3/4 p)".

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Chapter 1
General Guidelines On Recording Attributes of Manifestations and Items

Paragraph	Page	Comments
1.1.3 Mode of issuance	2	4th indent "The term *serial* refers to a resource issued in successive parts, usually bearing numbering, that has no predetermined conclusion (e.g., a periodical, a monographic series, or a newspaper). » **Our comment** : "or chronological designation" is missing after "usually bearing numbering".
1.1.3 Mode of issuance ****	2	6th indent "Guidelines and instructions in chapters 2–4 that are designated as being applicable to serials apply also to resources that exhibit characteristics of serials, such as successive issues, numbering, and frequency, but whose duration is limited (e.g., newsletters of events) and to reproductions of serials. » **Our comment** : The rules relating to serials cannot be applied to their reproductions of which the mode of issuance is the one of monographic resources.
1.3 Core elements ****	5	In the core elements, should be considered the case of the manifestation of a musical expression that requires to transcribe two responsibilities: that of the work (creator) and that of the expression (performer).
1.3 Core elements ****	5	Place of publication, etc. is missing, which is consistent with FRBR that do not take it into account in the basic level. However, it is an important element for serials for which the name of the publisher is not relevant (often these serials have no publisher or else (s)he changes much) whereas a place of publication can be identified.
1.4 Language and script	6	24th to 27th entries: "Numeric and/or alphabetic … last issue of first sequence", "Chronological designation of last issue … of first sequence" » ; " Numeric and/or alphabetic … first issue… of new sequence", "Chronological designation of first issue … of new sequence" **Our comment** : The current wording refers only to the case of two sequences of numbering. A larger formula is needed that would permit to treat the case of **more than two sequences**.
1.6.1.1 Change in mode of issuance of a multipart monograph	10	The reference to 2.1.4 (mode of issuance) is to be corrected in 2.1.3.

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Paragraph	Page	Comments
1.6.2.1 Change in mode of issuance of a serial	10	The reference to 2.1.4 (mode of issuance) is to be corrected in 2.1.3.
1.6.3.1 Change in mode of issuance of an integrating resource	10	The reference to 2.1.4 (mode of issuance) is to be corrected in 2.1.3.
1.7.1 General guidelines on transcription	11	We appreciate the possibility to apply alternative rules for transcription, in particular for older books where the true transcription of the title page, including the original punctuation, is an important element of identification.
1.7.3 Punctuation	12	"Transcribe punctuation as it appears on the source, omitting punctuation on the source that separates data to be recorded as one element from data to be recorded as a different element, or as a second or subsequent instance of an element." **Our comment** : The wording is not very clear and the examples do not give any clarification: If RDA means that one may omit the original punctuation that would be replaced in a record by a punctuation of ISBD type, by sub-fiel codes in a MARC type format or by a mark-up tag in a DC type system, RDA should state it in a more explicit manner. In the examples on whether the punctuation should be transcribed or not, a comment should be added to specify under which form and with which punctuation the information appears on the resource.
1.8. Numbers expressed as numerals or as words		In the examples a comment should be added to specify under which form the information appears on the resource.
1.8.2 Form of Numerals	16	1st indent: "Record numerals in the form preferred by the agency creating the data, unless the substitution would make the numbering less clear." **Our comment** : The examples do not illustrate the right rule, move them as follows: - the 3rd example illustrates the rule given first (form preferred by the agency) - the 1st example illustrates the first alternative (transcribe the form found on sources of information) - the 2nd example illustrates the second alternative (addition between brackets of the form preferred by the agency).
1.8.4 Inclusive numbers	17	1st indent: "When recording inclusive dates and other inclusive numbers record both the first and last number in full."

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Paragraph	Page	Comments
		Our comment : The rule is clear but the examples induce an ambiguity; one knows under which form to record the number but not how to choose the punctuation: dash or slash between the dates ? In which case does the cataloguer use one or the other?
1.9 Dates	18	There is no instruction on recording years notated only with the last two digits (for example, 86). Should it be transcribed "[19]86" or "[1986]"?
1.9.1 General guidelines	18	Rectify the reference 1.10.3 in 1.9.2.
1.9.2.5 Decade known to 1.9.2.10 Probable range of centuries	19- 21	The indications of decades or of centuries (1.9.2.5 to 1.9.2.10) follow the Anglo-American uses (1970s) and not international uses. Moreover, this way of recording induces confusion for the first decade of each century: how to distinguish "1800s" (century) from "1800s" (decade)? The use of a non numeric and non ambiguous character to replace the missing elements of the date would be better. We suggest that a range of dates be expressed according to the international standard ISO 8601, for instance: *[1971/1980]* *(Decade certain)* *[1971/1980?]* *(Decade uncertain)* *[1801/1900]* *(Century certain)* *[1801/1900?]* *(Century uncertain)* or that the missing elements be replaced with dots, for instance: *[197.]* *(Decade certain)* *[197.?]* *(Decade uncertain)* *[18..]* *(Century certain)* *[18..?]* *(Century uncertain)*
1.10.3 Quotations	1 p. 22	"Record quotations from the resource or from other sources in quotation marks. Follow the quotation by an indication of its source, unless that source is the preferred source of information for the identification of the resource (see 2.2.2)." **Our comment** : What is important is to identify the source and to transcribe what has been found there; the order is not very important. Therefore it would be better not to prescribe an order at an international level as the logic may vary from a country to the other. For instance, in France the logic is quite the opposite: first the indication of the source is given then the quotation.

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Chapter 2
Identifying Manifestations and Items

Paragraph	Page	Comments
2.2.2 Preferred source of information	5	The sources of information are clearly ordered.
2.2.2.2 Preferred sources of information for resources consisting of one or more pages Leaves, Sheets, or Cards (or Images of One or More Pages, Leaves, Sheets, or Cards)	6	"Exception **Early printed resources** **b) a cover (or an image of a cover)**" **Our comment** : A "cover" is cited as a source of information just after the title page and the colophon but this term "cover" is not defined: in particular, the draft makes no distinction between what pertains to the item data (binding or cover related to a previous owner, which is the more frequent case for early printed resource) and a probable cover issued by the publisher. As a substitute for the title page, the caption should precede the cover or the binding in the sources of information.
2.2.2.3 Resources consistinf of moving images and 2.2.2.4 Other resources (Preferred source of information) ****	6-7	"*Alternative* Use an eye-readable label bearing a title that is permanently printed on or affixed to the resource(excluding accompanying textual material or a container) in preference to the title frame or frames, or title screen or screens. If the resource does not contain a title frame or title screen, use as the preferred source of information, as applicable: either a) a label bearing a title that is permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g., a label on a videodisc) or b) embedded metadata in textual form that contains a title (e.g., metadata embedded in an MPEG video file). If the resource contains neither a title frame or title screen nor a source of information falling into category a) or b) above, use as the preferred source of information another source forming part of the resource itself, giving preference to sources in which the information is formally presented." **Our comment** : The alternative in 2.2.2.3 or the rule in 2.2.2.4 do not suit: why systematically prefer the label to the container when, more and more, the container or the jacket carry the relevant information? For instance, in the case of videogames, the container carries the French title and the label carries an English title while it is a French version. The label of an audio CD – unlike the title page of a book – is often –only a recall that is used to identify the resource itself if this one is separated from its container: on the label the titles and the statements of responsibility are often much abbreviated. In paragraph 2.2.2.1 General guidelines, the 3rd indent does

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prescribe "treat accompanying material as part of the resource itself when describing the resource as a whole using a comprehensive description" and "treat a container such as a box in which a game or kit is issued as part of the resource itself".

One should have the possibility to use an accompanying leaflet, a container as preferred source of information: so the formula "excluding accompanying material or a container" should be deleted.

2.2.3.3. Preferred sources of information for the reproduction and the original	8	"If the resource is a facsimile or reproduction of an original resource, and it contains a preferred source of information for the reproduction as well as a preferred source of information for the original, use the source for the reproduction as the preferred source of information." **Our comment** : To be related to 2.2.2.2 b)?
2.2.4 Other sources of information ****	9	1th indent, point b) in the list "If information required to identify the resource does not appear on a source forming part of the resource itself (see 2.2.2.1), take it from one of the following sources (in order of preference): a) accompanying material (e.g., a leaflet or an "about" file) **b) a container that is not an integral part of the resource (e.g., a box or case)** c) other published descriptions of the resource d) any other available source (e.g., a reference source). **Our comment** : There is a contradiction between "b) a container that is not an integral part of the resource (e.g. a box or case)" and paragraph 2.2.2.1, 3rd indent "treat a container such as a box in which a game or kit is issued as part of the resource itself": is it a "container purchased or made by an owner or custodial agency"? If it is the case, RDA should be more precise in the enumeration of other sources. For audiovisual and electronic resources, the original container (at the issuing stage) and the accompanying leaflet pertain to the resource itself. See also ISBD.
2.2.4 Other sources of information ****	9	3rd indent "When preparing analytical description… treat accompanying material as a source outside the resource itself." **Our comment** : Same remark as for 2.2.3 & 2.2.4: often the totality of information related to the tracks of a disc is only on the accompanying leaflet.
2.2.4 Other sources of information	10	4th indent "If information taken from a source outside the resource itself is supplied in any of the following elements, indicate that fact either by means of a note or by some other means (e.g., through coding or the use of square brackets): …

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Producer's name

…

Date of production

…"

Our comment :
We think that the terms "Producer's name " and "Date of production" are ambiguous in this list and that the type of production/producer should be specified as related to the material production of the resource: for sound recordings the statements of production are related to the expression and not to the manifestation.

2.3.1.1 Title Scope	11	"a) title proper (see 2.3.3)": correct reference is 2.3.2 "d) parallel other title information (see 2.3.4)": correct reference is 2.3.5 "g) later variant title (see 2.3.7": correct reference is 2.3.8 "h) key title (see 2.3.8)" :correct reference is 2.3.9 "i) abbreviated title (see 2.3.9)": correct reference is 2.3.10
2.3.1.2 Sources of information	p. 12	"b) For parallel titles, take the information from a source within the resource itself"

Our comment :
Point b) should follow the same rule as c) …from the same source as the title proper". Such as exposed, it is contrary to ISBD 1.3 "presented as an equivalent of the title proper on the prescribed source() of information".
For a title to be a parallel title, it is not sufficient that it is in another language than the title proper but the cataloguer should have the possibility to choose it as a title proper, which implies that this title in another language appears on the same source of information as the title proper.
Contradictory with the definition of parallel title, cf. RDA 2.3.3.1 "A parallel title is the title proper in another language or script"

Moreover this rule is dangerous as, to be able to take the parallel title anywhere on the resource, can lead to consider as a parallel title the translation of the title proper taken in the publication details (frequent case, as it seems, in books published in Hebrew in Israel that give an abstract and/or publication details in English). For instance,

האקנתוס עקיצת [Texte imprimé] / רותי רום.
– אביב-תל ; אחרונות ידיעות ד: חמ ספרי, 2007.
– 1 vol. (461-[1] p.) ; 21 cm.
– (עברית פרוזה).
– Le verso de la page de titre porte : "Stings of the acanthus".
– ISBN 965-482-315-2 (br.)

Comment: "Stings of the acanthus" is an English translation of the original Hebrew title made by the publisher and placed on the title page verso.

2.3.1.4 Recording titles	15	"Inaccuracies **FOR EXAMPLE:** Housing starts

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Source of information on v. 1, no. 1 reads: Housing s**t**arts"

Our comment :
Rectify the note:as follows: "Source of information on volume 1, number 1 reads: Housing **sa**rts"

2.3.1.4 Recording titles	16	4th For example " … annual report"

Our comment :
The mark of omission at the head of the title of an element that varies from an issue to another is in contradiction with ISBD 1.1.5.1 For continuing resources "if the title includes a date, name, number, etc., … . this omission is indicated by the mark of omission, except when it occurs at the beginning of the title."

2.3.1.7 Titles of parts, sections, and supplements ********	18	1st indent "If the resource is a separately issued part or section of, or supplement to, another resource and its title as presented on the source of information consists of: a) the title common to all parts or sections (or the title of the larger resource) and b) the title of the part, section, or supplement and if these two titles are grammatically independent of each other, record the common title, followed by the title of the part, section, or supplement. Disregard the order in which the parts of the title are presented on the source of information. Use a full stop to separate the common title from the title of the part, sections, or supplement."

Our comment :
RDA gives a miss on the intellectual autonomy of the title proper and confines itself to the material designation. See also the last indent of this paragraph, ""If the title of a part, section, or supplement is presented on the source of information without the title that is common to all parts or sections, record the title of the part, section, or supplement as the title. In the case of a part or section, record the title that is common to all parts or sections as part of the series information (see 2.12). In the case of a supplement, record the title of the main resource as the title of a related manifestation (see 27.1).", where RDA gives the rule for titles of parts on a source of information different from the one of the title common to all parts.

A title such as "Part A, General papers" or "Série B" or else "Supplement" or else "Student handbook" that appears on a source of information different from the one of the title common to all parts, should be chosen as the title proper according to RDA own rule exposed in the first indent, as no reference is made to the autonomy of the title.
Moreover, a title of section is always treated as a dependent title, according to the rules of ISSN network.

2.3.1.7 Titles of Parts, Sections,	20	Is the mention "new series" or "second series" really to be considered as a dependent title for an unnumbered series, which

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and Supplements ****		leads to a new description in case the mention changes? If the series is numbered, this mention is considered as a 1st level of <u>numbering</u> (cf. 2.6.8.3) and not as an element of the title. Such a difference in the treatment is not justified (as more as the director and/or the publisher can at any time decide to introduce or suppress a numbering in her/his series). The mention "new series" should be considered in any case as an element of the numbering. If the series is not numbered, this may be indicated in a note: for instance, "Volumes for 1965- mention "new series".
2.3.2.4 Title in more than one language or script	22	"choose the title proper on the basis of the sequence, layout, or typography of the titles..." **Our comment** : Here the draft does not specify if it is an order of preference but, if it is the case, then it is the reverse of ISBD 1.1.4.1.2 that prescribes to follow first the typography and, by default, the order of the elements.
2.3.2.10 Resource with no title	28	There is an ambiguity: is it here the manifestation or the item? Is it a *manifestation* issued without a title that needs a *devised title* (cf. 2.3.11 infra)? Or else is it an *item* without a title for which one can find the title elsewhere (cf. 2.2.4 Other sources of information) in order to make up for the lack of title in this item? A clear dictinction should be made between these two cases.
2.3.2.12 Major and minor changes in the title proper of serials	29- 31	It would be useful to add a paragraph that would specify that an ephemeral title change (some issues) may be considered as a minor change. This is what we already do in order not to multiply uselessly the records. For instance, a) title varies in the last issue La Gazette des enfants [Texte imprimé] : paraissant tous les jeudis / réd. en chef Mie d'Aghonne. – N° 1 (19 octobre 1876)-n° 2 (26 octobre 1876) … Variante historique du titre : La Petite gazette des enfants, n° 2 Notice n° : FRBNF32780800 b) title varies on an intermediary issue 1848 [Texte imprimé] : revue des révolutions contemporaines : revue périodique d'histoire politique, économique et sociale. – T. 40, n° 183 (juillet 1949)-t. 43, n° 189 (décembre 1951) ; n° 1 (1985)-n° 10 (1994) … Variante historique du titre : Revue des révolutions contemporaines, n° 187 (décembre 1950) Notice n° : FRBNF34394481 c) title varies on the two first issues (title proper taken from the stable form, from issue numbered 3) L'À-propos financier [Texte imprimé]. – N° 1 (24 octobre 1926)-n° 298 (11 avril 1934) [?] … *Variante historique du titre* : L'À-propos, n° 1-2 Notice n° : FRBNF32680470

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2.3.3.1 Parallel titles Scope	31	**3rd indent** "An original title in a language different from that of the title proper that is presented as the equivalent of the title proper is treated as a parallel title."

Our comment :
There is uncertainty on the location of this title: "presented as the equivalent of the title proper " is not quite the same thing as "appearing on the prescribed source of information". Only the titles present on this source may be transcribed as parallel titles, according to ISBD.

2.3.3.2 Sources of information	31	"Take parallel titles from any source within the resource"

Our comment :
This is not in accordance with ISBD 1.3 Introductory note which states: "A parallel title consists of a title in another language and/or script than the title proper and presented as an equivalent of the title proper on the prescribed source(s) of information". See also remark made on 2.3.1.2.

2.3.3.3 Recording parallel titles	32	**1st indent** "If there is more than one parallel title, record the titles in the order indicated by the sequence, layout, or typography of the titles on the source or sources of information."

Our comment :
This is not in accordance with ISBD 1.3.5.2 which states: "When a prescribed source of information bears more than one parallel title, these titles, if given, are transcribed in the **order indicated by the typography of** statements on the prescribed source of information or, if there is no typographical distinction, by the sequence of statements on the prescribed source of information."

2.3.3.3 Recording parallel titles	32	**3rd indent** "If a parallel title is taken from a different source than the title proper, and that fact is considered important, make a note on the source (see 2.20.2.3)."

Our comment :
In this present case, it is not a parallele title as defined by ISBD.

2.3.4.1 Oher title information Scope	34	**4th indent** "Other title information may be supplied for cartographic resources (see 2.3.4.5) and moving image resources (see 2.3.4.6)."

Our comment :
Why these exceptions ? ISBD 1.4.3.1 is larger in scope: "When the title is incomplete or ambiguous it may be completed by additional information supplied from the content of the resource. This addition, enclosed in square brackets, is treated as other title information."

2.3.4.3 Recording other title	36	1st indent after "Exception" "If more than one element of other title information is being

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information		recorded, record the elements in the order indicated by the sequence, layout, or typography of the elements on the source of information."

Our comment :
This is not in accordance with ISBD 1.4.4.4 which states: "When a prescribed source of information bears more than one statement constituting other title information, these statements, if given, are transcribed in the order indicated by the typography of statements on the prescribed source of information or, if there is no typographical distinction, the sequence of statements on the prescribed source of information."

2.3.4.6. Supplying other title information for moving image resources	38	Why is not this rule more general? It could be applied to sound recordings in the case of extracts, when this is not specified in the resource. For instance, "La bohème: [choix]"

2.3.4.7.1 Multipart monographs	39	1st indent "If other title information is added or changed on a subsequent part of a multipart monograph, record the added or changed other title information as later other title information (see 2.3.8.6)."

Our comment :
RDA is more restrictive than ISBD which states: "If other title information has been recorded in the title and statement of responsibility area and that information changes on subsequent issues or parts, the variation(s) are specified in area 7 when considered important to users of the catalogue (see 7.1.3). Alternatively, a note that the other title information varies may be given (see 7.1.3), or the change may be ignored."

The multipart monographic resources should follow the same rule as serials (2.3.4.7.2) and integrating resources (2.3.4.7.3) as this rule is in keeping with ISBD.

2.3.5.1 Parallel other title information Scope	40	"Parallel other title information is other title information in a language or script different from that of the title proper."

Our comment :
Such as it is defined in this rule, if the title proper is in a language and other title information in another language, then other title information is parallel other title information.
How is it possible to have a parallelism between title proper and other title information that are different elements of information?

2.3.5.3 Recording parallel other title information	40	"For example Eskimo women's music of Povungnituk …"

Our comment :
Rectify the last line "Chants inuit-gorge et guimabarde" in : "Chant inuit - gorge et guimbarde"

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2.3.5.4 Recording changes in parallel other title information Multipart monographs, Serials, Integrating resources	41- 42	Why is it not optional for multipart monographic resources when it is optional for serials and integrating resources?
2.3.6.3 Recording variant titles	44- 45	2nd For example

2nd For example

The world of television
Title proper recorded as: The world of television

Our comment :
what is the difference between these two titles ?

- two last For example
We're still standing
Title on container

LCIB
Commonly known title

Our comment :
If the comment would add the titles proper it would be easier to compare these to examples.

2.3.8.4.1 Multipart monographs	51	2nd example, "Dictionnaire des églises de France, Belgique, Luxembourg, Suisse **later title proper appearing on volume 2. Title proper ecorded as:** Histoire générale des églises de Ffrance, Belgique, Luxembourg, Suisse"

typo "ecorded" for "recorded"

2.3.9.1 Key title Scope	54	"A **key title** is the unique name assigned to a resource by an ISSN registration agency."

Our comment :
Specify "to a **continuing** resource ", in order to abide by the scope of ISSN.

2.3.9.2 Sources of information	54	"Take the key title from any source."

Our comment :
We disagree with this rule as the preferred source of information should be the ISSN register.

2.3.9.3 Recording key titles	54	"If the key title appears in the resource or is otherwise readily available, record it as found."

Our comment :
Only after checking it in the ISSN Register where the only reliable form appears.

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2.3.11 Devised title	55	Add an alternative that allows to use the incipit (incunabula, broadsheet, lampoons, etc.) as devised title.
2.3.11.3 Recording devised titles	55	Nowhere are brackets mentioned to indicate at the first very that the title is devised; what is intended in the last indent of this paragraph is only a note (see 2.20.2.3).
2.4.1.1 Statement of responsibility Scope	59	"A **statement of responsibility** is a statement relating to the identification and/or function of any persons, families, or corporate bodies responsible for the creation of, or contributing to the realization of, the intellectual or artistic content of a resource. A statement of responsibility may include words or phrases that are neither names nor linking words. Statements of responsibility may occur in conjunction with a title (see **2.4.2–2.4.3**), a designation of edition (see **2.5.4–2.5.5**), a designation of a named revision of an edition (see **2.5.8–2.5.9**), the title of a series (see **2.12.6–2.12.7**), or the title of a subseries (see **2.12.14–2.12.15**). For statements identifying performers of music whose participation is confined to performance, execution, or interpretation, see the instructions given under **7.20** . For statements identifying performers, narrators, and/or presenters in a motion picture or video recording, see the instructions given under **7.20** . For statements identifying persons who have contributed to the artistic and/or technical production of a motion picture or video recording, see the instructions given under **7.21** . For statements identifying persons, families, or corporate bodies responsible for the production, publication, or distribution of a resource, see the instructions given under **2.7.4** , **2.8.4** , and **2.9.4** , respectively. **Our comment** : This definition is very much (too much) large: it applies as much to the set of the statements of responsibility as to a single statement of responsibility corresponding to a specific function.. It is not specified when one moves from one statement of responsibility to another one.
	59	4th indent : correct reference is 7.23 not 7.20 5th indent : correct reference is 7.23 not 7.20 6th indent : correct reference is 7.24 not 7.21
	59	Why these references to 7.20 and 7.21 (format of notated music, medium of performance of musical content) ? The performers for music correspond to a type of responsibility per se that determines an expression : consequently they should be wholly taken as a statement of responsibility Likewise narrators and preseners in moving images, technical collaborators who correspond to a type of responsibility and should be considered as wholly taken as a statement of responsibility. In the last indent, the production considered is not audiovisual but archival. This should be specified clearly.

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| 2.4.1.4
Recording statements of
responsibility | 61-
62 | *"Optional Omission*
Abridge a statement of responsibility only if it can be abridged without loss of essential information. Do not use a mark of omission (…) to indicate such an omission. Always record the first name appearing in the statement. When omitting names from a statement of responsibility naming more than one person, etc., apply the instructions given under **2.4.1.5** ."

Our comment :
Here the examples explain which type of information may be omitted without indicating the omission: for this case, ISBD 1.5.37 and 1.5.5.5 is more precise and clearer.
ISBD 1.5.3.7 "A statement that is not connected with responsibility for the intellectual or artistic content of the resource is not considered a statement of responsibility.
Statements such as mottoes, dedications, and statements of patronage or prizes (e.g. "Winner of the Tchaikovsky Award, 1971") may be omitted or given in area 7 (see 7.1.4).
Information such as "with 33 maps", "with 32 parts", "accompanying gramophone record", "with accompanying reference manual" may be given in area 5.
For statements connected with such responsibility but present within the other title information, see 1.4."
ISBD 1.5.5.5 "Initials indicating membership of societies, academic degrees, etc., and statements of positions held and qualifications following a person's name are transcribed when the initials, etc., are necessary linguistically, or for identification of the person or in establishing a context for the person's activity. In all other cases initials, etc., are not considered part of the statement of responsibility and are omitted (see 1.5.3.7)."

With this current wording, it is not known exactly which omission may not be indicated. Furthermore, not to indicate omissions is not very honest towards the users who thus ignore the existence of the information in the resource and consequently this harms identification. |
| 2.4.1.5
Statement naming more
than one person, etc. | 62 | "Record a statement of responsibility naming more than one person, etc., as a single statement regardless of whether the persons, families, or corporate bodies named in it perform the same function or different functions."

Our comment :
For this case too ISBD 1.5.4.1 is clearer as it specifies "A single statement of responsibility occurs when the wording on the prescribed source of information shows a single statement. More than one person or corporate body may be named in such a statement, as when they are represented as performing the same function or, although performing different functions, their names are linked by a conjunction. " (example: "/ by Donald Elliott and illustrated by Clinton Arrowood") "
See also our remarks on RDA 2.4.1.1 |

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2.4.1.5 Statement naming more than one person, etc.	63	Optional Omission , 2nd example coordinated by University of Maryland [summary of omission] **Our comment** : The second example is not complete, "[summary of omission]" should be replaced by the summary concerned.
2.4.1.5 Statement naming more than one person, etc.	63	last indent, correct reference is 7.23
2.4.1.6 More than one statement of responsibility	64	**1st indent** "If there is more than one statement of responsibility, record the statements in the order indicated by the sequence, layout, or typography of the source of information from which the associated title, designation of edition, designation of a named revision of an edition, title of a series, or title of a subseries is taken." **Our comment** : ISBD 1.5.5.9 prescribes first the typography of the source of information ; if the mentions are taken outside this source, then the logical order applies.
2.4.2.3 Recording Statements of Responsibility Relating to Title ****	68- 69	"if not all statements of responsibility appearing on the source or sources of information are being recorded, give preference to those identifying creators of the intellectual or artistic content " **Our comment** : We disagree with this rule: in certain cases such as song, variety, the performer is the most important. Either (s)he is considered as a "creator" or the statements of responsibility are not limited to "creators" .
2.5 Edition statement Core element	70	"Designation of edition and designation of a named revision of a revision are core elements" **Our comment** : Wording : is it really "revision of a revision" and not "revision of an edition"?
2.5.1.6.1 Multipart monographs	73	"If edition statements differ from one part of a multipart monograph to another, make a note if the difference is considered to be important for identification or access (see 2.20.4.5.1)." **Our comment** : The paragraph referred to (2.20.4.5.1) says exactly the same thing in another wording.
2.5.1.6.2 Serials	74	"If an edition statement is added, deleted, or changed on a subsequent issue or part of a serial, make a note if the change is considered to be important for identification or access (see 2.20.4.5.2)."

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Our comment :
The paragraph referred to (2.20.4.5.2) says exactly the same thing in another wording.

2.5.1.6.3 Integrating resources	74	If an edition statement is added, deleted, or changed on a subsequent iteration of an integrating resource, and this change does not require a new description, change the edition statement to reflect the current iteration. If the earlier edition statement is considered to be important for identification or access, make a note giving the earlier statement (see 2.20.4.5.3).

Our comment :
The paragraph referred to (2.20.4.5.3) says exactly the same thing in another wording.

2.5.3.1 Parallel designation of edition Scope	77	"A parallel designation of edition is a designation of edition (see 2.5.2.1) in a language or script that differs from that of the title proper."

Our comment :
The parallelism is between elements of the same nature, so the wording should be « … that differs from that of the designation of edition. »
cf ISBD :2.2 « A parallel edition statement is an equivalent of the edition statement in another language and/or script. »

2.5.3.3 Recording parallel designation of edition	78	**2nd indent** "If there is more than one parallel designation of edition, record the statements in the order indicated by the sequence, layout, or typography of the statements on the source or sources of information."

Our comment :
This is not in accordance with ISBD 2.2 that states : "When the prescribed source of information bears edition statements in more than one language and/or script, the statement in the language and/or script of the title proper is given. When this criterion cannot be applied, the edition statement made prominent by typography or, if there is no typographical distinction, the one appearing first is given. The parallel statement(s) may also be given."

2.5.5.1 Parallel statement of responsibility relating to the edition Scope		"A **parallel statement of responsibility relating to the edition** is a statement of responsibility relating to the edition (see **2.5.4.1**) in a language or script that differs from that of the title proper."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "… that differs from that of the statement of responsibility relating to the edition".

2.5.7.1 Parallel desgnation of a	84	"A **parallel designation of a named revision of an edition** is a designation of a named revision of an edition (see **2.5.6.1**) in a

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named revision of an edition Scope		language or script that differs from that of the title proper."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "… that differs from that of the designation of a named revision of an edition".

2.5.7.3 Recording parallel designations of a named revision of an edition	84	"If there is more than one parallel designation of a named revision of an edition, record the parallel statements in the order indicated by the sequence, layout, or typography of the statements on the source or sources of information."

Our comment :
Why not follow the rule given in ISBD 2.2 and 2.4.4 that states: "When the prescribed source of information bears edition statements in more than one language and/or script, the statement in the language and/or script of the title proper is given. When this criterion cannot be applied, the edition statement made prominent by typography or, if there is no typographical distinction, the one appearing first is given. The parallel statement(s) may also be given." and "Parallel additional edition statements may be given."

2.5.9.1 Parallel statement of responsibility relating to a named revision of an edition Scope	p. 86	"A **parallel statement of responsibility relating to a named revision of an edition** is a statement of responsibility relating to a named revision of an edition (see **2.5.8.1**) in a language or script that differs from that of the title proper."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "... that differs from that of the statement of responsibility relating to a named revision of an edition."

2.6.1.3 Numbering of serials : facsimiles and reproductions	88	"When describing a facsimile or reproduction that has numbering relating to the original manifestation as well as to the facsimile or reproduction, record the numbering relating to the facsimile or reproduction. Record the numbering relating to the original manifestation as numbering pertaining to a related manifestation (see **27.1)"**

Our comment :
The facsimile or reproduction is not issued serially, therefore it has no numbering of this kind.
The details on the period covered by the reproduction can be given in a note.

2.6.1.4 Recording numbering of serials	89	2nd indent, "When describing a serial that has ceased publication, record the numbering for both the first issue or part (see 2.6.2–2.6.3) and the last issue or part (see 2.6.4–2.6.5). For example Vol. 3, no. 6 numeric designation of first issue

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Aug./Sept. 1970
Chronological designation of first issue

vol. 5, no. 3
numeric designation of last issue
Mar. 1972
Chronological designation of last issue"

Our comment :
For need of clarity illustrating the rule, it would be better to pair the corresponding elements of the numbering, that would give the following examples :
"Vol. 3, no. 6
numeric designation of first issue
vol. 5, no. 3
numeric designation of last issue

Aug./Sept. 1970
Chronological designation of first issue
Mar. 1972
Chronological designation of last issue »

2.6.1.4 Recording numbering of serials	90	1st indent "If the numbering starts a new sequence with a different system, record: a) the numbering of the first issue or part under the old system (see 2.6.2–2.6.3 b) the numbering of the last issue or part under the old system (see 2.6.6–2.6.7) **and** c) the numbering of the first issue or part under the new system (see 2.6.8–2.6.9).

For example
Volume 1, number 1
numeric designation of first issue
November 1943
Chronological designation of first issue

volume 10, number 12
numeric designation of last issue of first sequence
June 1953
Chronological designation of last issue of first sequence
number 1
numeric designation of first issue of new sequence

July 1974
Chronological designation of first issue of new sequence"

Our comment :
For need of clarity illustrating the rule, it would be better to pair the corresponding elements of the numbering, that would give the following examples: "For example
Volume 1, number 1

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numeric designation of first issue
volume 10, number 12
numeric designation of last issue of first sequence
number 1
numeric designation of first issue of new sequence

November 1943
Chronological designation of first issue
June 1953
Chronological designation of last issue of first sequence
July 1974
Chronological designation of first issue of new sequence"

2.6.2.3 Recording numeric and/or alphabetic designation of first issue or part	92	Add an example of coupled numbering separated by a slash (/) on the same model as what is done in 2.6.3.3 for the date. suggested: "No. 1/3 Designation appears on issue as : No. 1-2-3"
2.6.3.3 Recording chronological designation of first issue or part	94	2nd "**FOR EXAMPLE:** 1993/1994 **Designation appears on issue as:** 1993-4 » **Our comment** : An example is needed too showing a year represented only by the last two digits "oct. 75" even "10/75".
2.7 Production statement to 2.10 Manufacture statement		Why not gather the totality of prescriptions on the manner to record places, names and dates (manner that is always the same) and define after that each type of mention (production, publication, diffusion, manufacture), while specifying to which case each prescription applies and which mention to record first. This would be easier and clearer than to be obliged to navigate between the four ones and read the same thing more than once to find in the definition the few words that indicate the differences. This would also allow to explain how to record these elements for earlier resources (apparently there is the same distinction to be made as for modern book, even if the notions differ slightly).
2.7 Production statement	106	It is necessary to distinguish clearly the different possible types of production: production in the archival sense (as treated here) has nothing in common with the production of audiovisual resources.
2.7.1.1 Production statement Scope	106	A **production statement** is a statement identifying the place or places of production, producer or producers, and date or dates of production of a resource. Production statements include statements relating to the inscription, fabrication, construction, etc., of a resource in an unpublished form. **Our comment** : The definition of "production statement" is tautologic and ambiguous as it does not specify precisely that it is not the case of production for audiovisual resources. In RDA the element important for its meaning "*in an unpublished form*" is mentioned only in the next indent – and even then, the verb

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"includes" implies that one cannot be sure that statements of responsibility are reserved for unpublished resources. It becomes clearer when one arrives at every element.

2.7.1.5.1 Multipart monographs	108	1st indent, correct reference is 2.20.6.4.1
2.7.2.4 More than one place of production	110	"If more than one place of production is named on the source of information, record the place names in the order indicated by the sequence, layout, or typography of the names on the source of information. If there are two or more producers, and two or more places associated with one or more of them, record the place names associated with each producer in the order indicated by the sequence, layout, or typography of the place names on the source of information."
		Our comment : This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..
2.7.2.7 Change in place of production	112	The correct reference is 2.7.1.5.
2.7.3.1 Parallel place of production Scope	112	"A parallel place of production is a place of production (see 2.7.2.1) in a language or script that differs from that of the title proper."
		Our comment : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "... that differs from that of the place of production."
2.7.4.4 Statement of function, optional addition	113	"Enclose the addition in square brackets":
		Our comment : In this option, RDA prescribes a punctuation; in 2.2.4, on information taken from a source other than the preferred source of information, the wording was larger and that is preferable: "indicate that fact either by means of a note or by some other means (e.g., through coding or the use of square brackets)". The same remark applies to 2..8.4.4, 2.8.6.3, etc.
2.7.5.1 Parallel producer's name Scope	114	"A parallel producer's name is a producer's name (see 2.7.4.1) in a language or script that differs from that of the title proper."
		Our comment : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the producer".
2.7.6.3 Recording date of	115	***"Optional Addition*** If the date as it appears in the resource is not of the Gregorian or

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production, optional addition		Julian calendar, follow it with date or dates of the Gregorian or Julian calendar."
		Our comment : In this option, RDA introduces an order of the elements when the important thing is that they be recorded and qualified not that they follow a precise order. Also, why this choice "Gregorian or Julian"? Is this according to the uses of the cataloguing agency?
2.7.6.4 Chronograms	116	Why not put the prescriptions relating to the chronograms in 1.9? Then, it would suffice to refer to them. This remark applies also to 2.8.6.4, 2.9.6.4 et 2.10.6.4
2.8 Publication statement		core element : place of publication is optional
		Our comment : This rule is in accordance with FRBR but not with ISBD: place of publication is an important element for serials and should be mandatory for this category of resources (see our comment on 1.3).
2.8 Publication statement		It is unfortunate that a general alternative is not intended for the case of earlier printed resources.
2.8.2.4 More than one place of publication	123	"If more than one place of publication is named on the source of information, record the place names in the order indicated by the sequence, layout, or typography of the names on the source of information. If there are two or more publishers, and two or more places associated with one or more of them, record the place names associated with each publisher in the order indicated by the sequence, layout, or typography of the place names on the source of information."
		Our comment : This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence...
2.8.2.6 Place of publication not identified in the resource	125	2nd indent : « If neither a known nor a probable local place or country, state, province, etc., of publication can be determined, record *Place of publication not identified*. »
		Our comment : This is not very international and not in accordance with ISBD prescribed abbreviations. Why abandon the conventional abbreviation "s.l."prescribed by ISBD that is internationally understood ? At the time of catalogues on the web (therefore worldwide attainable), to give such an information in the language of the catalogue is not helpful to other users. The equivalent of "*Place of publication not identified* " in a language not known by the internet surfer will lead to misunderstanding and will confuse this statement with the name of

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		the place.
2.8.3.1 Parallel place of publication Scope	126	"A parallel place of publication is a place of publication (see 2.8.2.1) in a language or script that differs from that of the title proper." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the place of publication".
2.8.3.3 Recording parallel places of publication	127	2nd indent "If there is more than one parallel place of publication, record the names in the order indicated by the sequence, layout, or typography of the names on the source or sources of information." **Our comment** : This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..
2.8.4.5 More than one publisher	129	"If more than one person, family, or corporate body is named as a publisher of the resource, record the publishers' names in the order indicated by the sequence, layout, or typography of the names on the source of information." **Our comment** : This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..
2.8.4.7 No publisher identified ****	130	2nd indent : "If neither the publisher nor the distributor of a resource that is in a published form can be identified, record *publisher not identified*." **Our comment** : This is not very international and not in accordance with ISBD prescribed abbreviations. Why abandon the conventional abbreviation "s.l."prescribed by ISBD that is internationally understood ? At the time of catalogues on the web usable (therefore worldwide attainable), give such an information in the language of the catalogue is not helpful to other users. The equivalent of "*publisher not identified* " in a language not known by the internet surfer will lead to misunderstanding and will confuse this statement with the name of the publisher.
2.8.5.1 Parallel publisher's name Scope	130	"A parallel publisher's name is a publisher's name (see 2.8.4.1) in a language or script that differs from that of the title proper." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the publisher's name".

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2.8.5.3 Recording parallel publisher's names	131	2nd indent « If there is more than one parallel publisher's name, record the names in the order indicated by the sequence, layout, or typography of the names on the source or sources of information. » **Our comment** : This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..
2.8.6.6 Date of publication not identified in the resource	136	1st indent: "If the date of publication is not identified in a resource that is in a published form, record (in order of preference) the date of distribution (see **2.9.6**), the copyright date (see **2.11**) or the date of manufacture (see **2.10.6)"** **Our comment** : The date of legal deposit should also be mentioned.
2.8.6.6 Date of publication not identified in the resource	136	4th indent "If an approximate date of publication for a resource that is in a published form cannot reasonably be determined and neither a date of distribution, a copyright date, nor a date of manufacture is available, record *date of publication not identified* » **Our comment** : It is a rule contrary to that of ISBD 4.4.9 and moreover an internal inconsistency in RDA: rules developed in RDA 1.9 allow to give a date, including a range of centuries, so here the rule should be to give a date as ISBD never prescribed "[s.d.]".
2.8.6.6 Date of Publication Not Identified in the Resource	136	In the case of earlier resources, it would be useful to recall the alternative of 1.8.1 for the concerned elements from which, the date: "For *early printed resources*, transcribe numbers expressed as numerals or as words appearing in numbering of serials, date of production, date of publication, date of distribution, or date of manufacture in the form in which they appear on the source of information."
2.9.2.5 Place of distribution in More Than One Language or Sscript	141	"If the place of distribution appears on the source of information in more than one language or script, record the form that is in the language or script of the title proper. If this criterion does not apply, record the place name in the language or script that appears first." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the place of distribution".
2.9.2.6 Place of distribution not identified in the resource	141	2nd indent "If neither a known nor a probable local place or country, state, province, etc., of distribution can be determined, record *Place of distribution not identified*."

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Our comment :
- if "Place of distribution is optional", why bother to record that there is no information on the resource?
- and, if this means that the resource carries no information of any kind relating to the place of publication, then it should be recalled here, as RDA is not intended to be read through out (we are able to realize this at this time) and as this rule then depends on what is worded in 2.9: "Core element - Distributor's name is a core element if the publisher is not identified. Date of distribution is a core element if the date of publication is not identified. Place of distribution is optional."

2.9.3 Parallel place of distribution	143	"A parallel place of distribution is a place of distribution (see 2.9.2.1) in a language or script that differs from that of the title proper."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "... that differs from that of the place of distribution"

2.9.4 Distributor's name 2.9.4.5 More than one distributor	145	"If more than one person, family, or corporate body is named as a distributor of the resource, record the distributor's names in the order indicated by the sequence, layout, or typography of the names on the source of information."

Our comment :
This order in recording is not in accordance with the specifications of ISBD 4.2.2 that prescribes first the typography then the sequence..

2.9.4.7 No distributor identified	146	"If no distributor is named within the resource itself, and the distributor cannot be identified from other sources as specified under 2.2.4 , record *distributor not identified*. If no distributor is named within the resource itself, and the distributor cannot be identified from other sources as specified under 2.2.4, record *distributor not identified*. Indicate that the information was taken from a source outside the resource itself as instructed under 2.2.4 ."

Our comment :
If this means that the resource carries no information of any kind relating to the publisher, then it should be recalled here, as RDA is not intended to be read through out (we are able to realize this at this time) and as this rule then depends on what is worded in 2.9: "Core element - Distributor's name is a core element if the publisher is not identified. Date of distribution is a core element if the date of publication is not identified. Place of distribution is optional."

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2.9.5 Parallel distributor's name		
2.9.5.1 Scope	146	"A parallel distributor's name is a distributor's name (see 2.9.4.1) in a language or script that differs from that of the title proper." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the distributor's name"
2.9.5.3 Recording parallel distributor's names	147	2nd indent "If there is more than one parallel distributor's name, record the names in the order indicated by the sequence, layout, or typography of the names on the source or sources of information." **Our comment** : This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..
2.9.6.4 Chronograms	148	Why repeat prescriptions relating to chronograms ? Do resources exist where the chronogram would not apply to the publication but to the distribution ?
2.10 Manufacture statement		
2.10.1.2 Sources of information	150	"a) the same source as the title proper (see 2.3.3)" **Our comment** : The correct reference is"(see 2.3.2)"
2.10.1.4 Recording manufacture statements	150	"Record a manufacture statement or statements for a resource that is in an unpublished form (e.g., a manuscript, a painting, a sculpture, a locally made recording)." **Our comment** : The indents of this paragraph 2.10.1.4 that mention resources "in an unpublished form" contradict 2.10.1.1 ("published") and should therefore be deleted or moved to 2.7.1.4.
2.10.2.4 More than one place of manufacture	154	This paragraph is incorrectly aligned: it should be aligned in the same way as all the others paragraphs numbered with 4 digits. If not, paragraphs 2.10.2.5 Place of manufacture in more than one language or script and 2.10.2.6 Place of manufacture not identified in the resource seem to depend on "More than one place of manufacture", which is not the case.
2.10.2.4 More than one place of manufacture	154	1st indent "If more than one place of manufacture is named on the source of information, record the place names in the order indicated by the sequence, layout, or typography of the names on the source of information. If there are two or more manufacturers, and two or more places associated with one or more of them, record the place names

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associated with each manufacturer in the order indicated by the sequence, layout, or typography of the place names on the source of information."

Our comment :
This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..

2.10.2.6 Place of manufacture not identified in the resource	155	**1st indent** "If neither a known nor a probable local place or country, state, province, etc., of distribution can be determined, record *Place of distribution not identified*." **Our comment** : - If "Place of distribution is optional", why bother to record that there is no information on the resource? - And, if this means that the resource carries no information of any kind relating to the place of publication, then it should be recalled here, as RDA is not intended to be read through out (we are able to realize this at this time) and as this rule then depends on what is worded in 2.10: "Core element -Manufacturer's name is a core element if neither a publisher nor a distributor is identified. Date of manufacture is a core element if neither the date of publication, the date of distribution, nor the copyright date is identified. Place of manufacture is optional."
2.10.3.1 Parallel place of manufature Scope	156	"A parallel place of manufacture is a place of manufacture (see 2.10.2.1) in a language or script that differs from that of the title proper." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the distributor's name"
2.10.3.3 Recording parallel places of manufature	156	"If there is more than one parallel place of manufacture, record the names in the order indicated by the sequence, layout, or typography of the names on the source or sources of information." **Our comment** : This order in recording is not in accordance with the specifications of ISBD 4.2.2 that prescribes first the typography then the sequence..
2.10.4.5 More than one manufacturer	158	"If more than one person, family, or corporate body is named as a manufacturer of the resource, record the manufacturers' names in the order indicated by the sequence, layout, or typography of the names on the source of information." **Our comment** : This order in recording is not in accordance with the specifications of ISBD 4.2.2 that prescribes first the typography then the sequence..
2.10.4.7	158	"If no manufacturer is named within the resource itself, record

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No manufacturer identified		*manufacturer not identified .*"

Our comment :
This element is mandatory only in case of absolute lack of information relating to the publisher and the producer, see 2.10.4 Core element (p. 157) "Manufacturer's name is a core element if neither a publisher nor a distributor is identified. Date of manufacture is a core element if neither the date of publication, the date of distribution, nor the copyright date is identified. Place of manufacture is optional."
This should be recalled in the rule itself as RDA is not intended to be read through out (we are able to realize this at this time) and as this rule then depends on what is worded in 2.10 Core element "*Manufacturer's name* is a core element if neither a publisher nor a distributor is identified. *Date of manufacture* is a core element if neither the date of publication, the date of distribution, nor the copyright date is identified. *Place of manufacture* is optional. »

2.10.5
Parallel manufacturer's name

2.10.5.1
Scope
159
"A parallel manufacturer's name is a manufacturer's name (see 2.10.4.1) in a language or script that differs from that of the title proper."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the manufacturer's name".

2.10.5.3
Recording parallel manufacturer's name
159
"If there is more than one parallel manufacturer's name, record the names in the order indicated by the sequence, layout, or typography of the names on the source or sources of information."

Our comment :
This order in recording is not in accordance with the specifications of ISBD that prescribe first the typography then the sequence..

2.10.6.1
Date of manufacture
Scope
159
2nd indent:
"For an archival resource, the date of manufacture is the date the resource was produced or the date or dates of record-keeping activity."

Our comment :
Delete the indent relating to an archival resource that have been already treated in 2.7 *Production statement* and that have no place here as "manufacture statements" are applying to published resources.

2.10.6.6
Date of manufacture not identified in the resource
162
2nd indent
"If an approximate date of manufacture for a resource that is in a published form cannot reasonably be determined, record *date of manufacture not identified*."

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Our comment :
It is a rule contrary to that of ISBD 4.4.9 and moreover an internal inconsistency in RDA: rules developed in RDA 1.9 allow to give a date, including a range of centuries, so here the rule should be to give a date as ISBD never prescribed "[s.d.]".

2.10.6.7 Archival resources and collections	162	2nd indent

2.10.6.7
Archival resources and collections — 162 — 2nd indent
"If the archival resource or collection spans a period of time, record the inclusive dates (i.e., the earliest and latest dates of manufacture of the resource or of the record-keeping activity). »

Our comment :
Delete this paragraph 2.10.6.7 the contents of which have already been treated in 2.7.6.7 and that has no place here with statements of "manufacture".

2.11.1.1 & 2.11.1.3 Basic instructions on recording copyright dates — 163-164 — Scope, 2nd indent
"Copyright dates include phonogram dates (i.e., dates associated with claims of protection for sound recordings)."

Our comment :
It should be useful to replace "phonogram dates" by "dates of protection of phonograms", which is more precise and corresponds exactly to the definition given in the parentheses, in order to make possible the real development of the symbol "P" that signifies "protection" and not "phonogram".

2.11.1.3
Recording copyright dates — 164 — The symbol ℗ is not the symbol for phonogram but for the protection attached to the phonogram.
In our own records, if we could not reproduce the appropriate symbol © or ℗ we would record only "cop." or "P", according to ISBD 4.4.7.

2.12.5.1
Parallel other title information of series
Scope — 172 — "Parallel other title information of series is other title information of a series in a language or script that differs from that of the title proper of the series."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the other title information"

2.12.7.1
Parallel statement of responsibility relating to series
Scope — 174 — "A parallel statement of responsibility relating to series is a statement relating to series (see 2.12.6.1) in a language or script that differs from that of the title proper of the series."

Our comment :
Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "...that differs from that of the statement of responsibility relating to series".

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2.12.9.7 Alternative numbering systems	179	**"FOR EXAMPLE :** 1 **When series changed title, publisher began a new system with** 1 **and continued the system from the earlier title with** 235 235" **Our comment** : As it is a single example, the comment should follow the two components of this example (1 and 235) or precede them but in no case be between them.
2.12.13.1 Parallel other title information of subseries Scope	183	"Parallel other title information of subseries is other title information of a subseries in a language or script that differs from that of the title proper of the subseries." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "... that differs from that of other title information of subseries".
2.12.15.1 Parallel statement of responsibility relating to subseries Scope	185	"A parallel statement of responsibility relating to subseries is a statement relating to subseries (see 2.12.14.1) in a language or script that differs from that of the title proper of the subseries." **Our comment** : Same remark as on paragraph 2.5.3 Parallel designation of edition, the parallelism can exist only between elements of the same nature, so the wording should be "... A parallel statement of responsibility relating to subseries is a statement *of responsibility* relating to subseries (see 2.12.14.1) in a language or script that differs from that of the *statement of responsibility relating to subseries"*
2.15.1.1 Basic instructions on recording identifiers for the manifestation Scope	190	2nd indent "Identifiers for manifestations include identifiers registered applying internationally recognized schemes (e.g., ISBN, ISSN, URN), as well as other identifiers assigned by publishers, distributors, government publications agencies, document clearinghouses, archives, etc., following internally devised schemes. *ifiers include identifiers registered in accordance with internationally recognized schemes (e.g., ISBN, ISSN, URN), as well as other identifiers assigned by publishers, distributors, government publications agencies, document clearinghouses, archives, etc., following internally devised schemes."* **Our comment** : The part of this indent indicated here in italics is a repetition of what precedes it; to be deleted.
2.15.1.4 Recording identifiers for manifestations	191	1st "For example, ISRC FR-Z03-91-01231" is an example erroneously given as an identifier of a manifestation. ISRC should **absolutely not** appear among identifiers of manifestations. ISRC identifies an expression and a same ISRC may

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****		appear in different manifestations. Conversely, a single manifestation may contain different ISRCs. Replace this erroneous example by an example of EAN, for instance EAN 3453277539730.
2.15.1.4 Recording identifiers for manifestations	191	Should not the UPC code be taken into account with other standardized numbers?
2.15.1.5 More than one identifier for the manifestation	192	"*Alternative* If there are more than three identifiers for individual parts, record only the first identifier and the last identifier, separated by a hyphen if the identifiers are consecutive, or by a diagonal slash if they are not." **Our comment** : This rule does not apply to all types of identifiers. It is applicable to trade numbers such as numbers in a trademark for a boxed set of discs. At the opposite, it has no meaning for standardized numbers such as ISBN that are ending with a check digit even if numbers appearing in the last but one segment are following each other.
2.15.2.3 Recording publishers' numbers for music	194	1ˢᵗ FOR EXAMPLE Example Nimbus : NI 5144-NI5448. It is not a publisher's number but a reference in a trademark.
2.20 Note	199- sq.	It is a pity to gather the instructions about notes in a separate paragraph, on the contrary these prescriptions should be at most given directly with the element to which they apply. This would avoid repeating the definition as it is the case in 2.20.3.1 Note on statement of responsibility, Scope.
	p. 199 sq.	Notes mix up information relating to the *manifestation* (for example, page 201: *French title from cover)* and information relating to the *work* (for example, page 202: *also known as The: blue boy).* The second ones are to be repeated in the description of each manifestation that contains the work concerned while the first ones apply only to a unique manifestation. The *attribution* (see 2.20.3.3 page 206) applies only and exclusively to the work whereas the Publication statement (see 2.20.7 page 214) applies evidently and only to the manifestation. Yet, the great quality of RDA is to distinguish scrupulously information relating to the work from information relating to the manifestation … till we arrive to 2.20 Note.
2.20.2.2 Sources of information	200	These sources of information being the same for all notes "any source", there is no need to repeat the basic instruction as in 2.20.1.2. In RDA online just a link would suffice.
2.20.2.3 Title source	200	The sources of information for the choice of the Title source are not adapted to phonograms and particularly points a) and b) do not apply to sound recordings. Either a point c) for sound recordings is missing or the rule is to systematically make a note on the title source for sound recordings

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(that has neither title page nor title frame or title screen).
Which one of these hypotheses is the right one ?
The case of electronic resources is not treated here whereas ISBD
prescribes a note on the title source in all cases.

2.20.3 Note on statement of responsibility	205	The performers should be treated in a statement of responsibility in order to answer the tasks "identify" and "select", because manifestations could not be distinguished without reading all notes (see also comments on 0.6.3 and 1.3).
2.20.3.1 Scope	205	2nd indent, typo : read "resource" not "esource".

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Chapter 3
Describing carrier

Paragraph	Page	Comments
General remarks on Chapter 3 ********		We have general remarks on the whole chapter 3 regarding audiovisual resources. This organization by discrete elements is useless for all carriers that conform to a standard; in this case it is sufficient to indicate the standard and, if the case arises, to add complementary specifications when parameters exist that have a certain margin of variation, for instance, "1 CD audio" is suppposed to have a diameter of 12 cm, to be digital or optical, etc. Moreover, this is the standard whicht is the most known to the largest audience: then, to indicate the standard rather than dividing the resource between its different technical characteristics is a direct application of the rule of "common use" and of the principle to respect "the convenience of the user" , cf. *Statement of international cataloguing principles*.
****		In the domain of audiovisual and sound resources, certain technical informations that are regarded as associated to a carrier come under expression (case of phonograms) and work (case of videograms). (See also 3.3.1.2. ; 3.5.1.4.3 ; 3.5.1.4.4 ; 3.16.4 …)
		Where is the accompanying material described? It is however related to the manifestation. The solution "Related manifestation" as proposed in the appendix D seems to us not very good as it is the same manifestation in a relation whole/part. It is very heavy to deal with and is justified only in the case of muiltiform multimedia resources.
		Where is the characteristic "one-sided/double-sided" for discs specified?
3.1 **General guidelines on describing carriers** **3**.1.4.1 Recording Only Carrier Type and Extent of Eeach Carrier	2	The standard should be indicated at the very beginning of this generic stage of audio disc or computer disc.
3.1.4.2 Recording Carrier Type, Extent, and Other Characteristics of Each Carrier	3	Being standardized, the dimensions of CD (sound recordings), sound cassettes, etc. have no need to be repeated.
3.1.5 Online Resources	7	How to articulate format of the file with the extent?

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Paragraph	Page	Comments
3.1.5 Online resources	8	"FOR EXAMPLE text file File Type, Encoding Format, and File Size for a Text File in an Online Resource RTF 73 KB" **Our comment** : If this example represents a single resource, then its presentation "File Type, encoding …" should be put at the beginning of the enumeration of different material details characterising the resource described and not be interpolated between them.
3.2 **Media type** 3.2.1.2 Recording media type	9	Add the possibility to indicate "multiform" as an alternative c), which is allowed by ISBD.
3.2.1.2 Recording media type	10	last indent, after the table "If none of the terms listed above apply to the carrier of the resource being described, record *other*." **Our comment** : This value "other" is justified only in the case of coded data processed by machine. In the prospect of display for human eye reading, « other » gives no information. Either "the media type applicable to the resource is readily ascertained" and, in this case, it is identified by a specific term taken out of the list and defined by the cataloguing agency or, the value "unspecified" is used according to its definition as given in the following indent, page 11: "If the media type or types applicable to the resource being described cannot be readily ascertained, record *unspecified*."
3.2.1 Media type Table 3.1 **3.3** **Carrier type**	10	"Electronic" that is the term retained by ISBD is to be preferred to the term "computer".
3.3.1.2 Recording carrier type ****	11- 14	The definition given in 3.3.1.1 "format of the storage medium and housing of a carrier <u>in combination with the type of intermediation device required</u> to view, play, run, etc. the content of a resource" contradicts the terms listed in 3.3.1.2. Why not give directly the name of the carrier when it is standard and give directly the indication of the necessary intermediation device, for instance CD (sound recordings) DVD video, etc. ? In addition, this list is not sufficiently precise: "audio disc" gives no information at all on the reading device needed if CDs are included. Where are put the DVD video? How to articulate this with the "encoding format" in paragraph 3.19.3? See also 3 ; 3.5.1.4.3 ; 3.5.1.4.4 ; 3.16.4 …)

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Paragraph	Page	Comments
		In a general way, the fact to multiply elements to describe details of standard carriers rather than name them directly goes against the principles of Cost efficiency described in 0.4.2.2 and of Common usage described in 0.4.3.8.
3.3.1.2 Recording carrier type	14	"If none of the terms listed above apply to the carrier or carriers of the resource being described, record *other*. If the carrier type or types applicable to the resource being described cannot be readily ascertained, record *unspecified*."

Our comment :
We make the same remark as we did for 3.2.1.2.
This value "other" is justified only in the case of coded data processed by machine.
In the prospect of display for human eye reading, « other » gives no information. Either "the carrier type applicable to the resource is readily ascertained" and, in this case it is identified by a specific term taken out of the list and defined by the cataloguing agency or, the value "unspecified" is used according to its definition as given in the 2nd indent: "If the carrier type or types applicable to the resource being described cannot be readily ascertained, record *unspecified*".
Cf. what is said in 3.4.1.5 Other terms used to designate the type of unit. As 3.4.1.5 gives some indication in reference to 3.3.1.2; a parallel reference from 3.3.1.2 to 3.4.1.5 could be made.

Paragraph		Comments
3.4 Extent		Why is there no extent for carriers of sound or audiovisual resources? The extent is expressed in terms of duration or length, for instance the total duration of a disc that contains several expressions.

The other characteristics of the carrier for these resources as, for instance, the speed of rotation for a disc, the format for an electronic file, the specification "one-sided" for discs or "double-sided" for DVDs should be treated as qualifiers of "carrier type".

Paragraph	Page	Comments
3.4.1 Basis instructions on recording extent 3.4.1.3 Recording extent ****	15	"Exceptions Cartographic resources, Notated music, Still images, Text, Three-dimensional forms"

Our comment :
Is there really a general rule when so many exceptions are listed ?
It would be useful to treat all types of resources according to the same logic of description. We give once again the remark that we made in 2006 and that seems to us essential in catalogues containig descriptions of all types of resources: "

The outline of RDA, which is based on data elements rather than on types of documents, highlights the inconsistency with which information is introduced in this data element: the confusion between content and carrier comes from very old practices; according to the type of the resource, the statement will be different:
- for some types of resources, the focus will be on content:

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Paragraph	Page	Comments
		e.g.: 1 score, 1 map, 3 diagrams - for some other types of resources, the focus will be on carrier: e.g.: 1 microfilm cassette, 1 optical disk, 2 audio tape reels, 1 film reel - additionally, in the case of printed books, the physical description is implicit and is only explicated when the plural form is required: e.g.: 327 p. (there is only one volume) 6 v. (there is more than one volume)"
3.4.1.7 Number of subunits	18	2nd sentence of the indent: "Record the number of subunits, **in parentheses**, following the term designating the type of unit." **Our comment** : Here, RDA prescribes a punctuation "in parentheses" when punctuation was declared out of the rules of RDA as being a question of display. We see the difficulty here: how to indicate recording the sub-unit and distinguishing it formally from the unit on which it depends? And, leave the care of this to cataloguing agencies would be dangerous in terms of interoperability and exchange of data. Why not make a sub-element of it?
3.4.1.7.1 Computer discs, cartridges, etc.		"If the resource consists of one or more files in a format that parallels a print, manuscript, or graphic counterpart (e.g., PDF), specify the number of subunits by applying the instructions for extent of cartographic resources (see 3.4.2), notated music (see 3.4.3), still images (see 3.4.4), and/or text (see 3.4.5), as appropriate. For Example: 1 computer disc (184 remote-sensing images) 1 computer disc (xv pages, 150 maps)" **Our comment** : This rule and its examples lead to confusion: a page cannot be a subunit of a CD, it is the number of files that represents the sub-units of a CD. Moreover, "remote-sensing image", "maps" refer to contents and do not come under the physical description. This raises a problem of consistency in the description of the resource: what exactly is described in chapter 3?
3.4.1.7.4 Microfiches	19	"If the format of the resource parallels a print, manuscript, or graphic counterpart, specify the number of subunits by applying the instructions for extent of cartographic resources (see 3.4.3), notated music (see 3.4.3), still images (see 3.4.4), and/or text (see 3.4.5), as appropriate. For Example: 3 microfiche (1 score (118 pages))" **Our comment** : We make the same remark as on 3.4.1.7.1: a page cannot be a subunit of a microfiche, it is the number of views that represents the sub-units

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Paragraph	Page	Comments
		of a microfiche. "Score" refers to content and to music format. FOR EXAMPLE 3 microfiche (1 score (118 pages)

  - typo: missing: an "s" to "microfiche", a second closing parenthesis after "118 pages)".

Paragraph	Page	Comments
3.4.1.7.5 Online resources	20	"If the resource consists of one or more files in a format that parallels a print, manuscript, or graphic counterpart (e.g., PDF), specify the number of subunits by applying the instructions for extent of cartographic resources (see 3.4.2), notated music (see 3.4.3), still images (see 3.4.4), and/or text (see 3.4.5), as appropriate. For Example: 1 online resource (68 pages) 1 online resource (3 scores) 1 online resource (36 photographs)"

Our comment :
We make the same remark as on 3.4.1.7.1: a page cannot be a subunit of an electronic resource, it is the number of files that represents the sub-units of an electronic resource or their size expressed in bytes. Moreover, "scores", "photographs" refer to the content of the resource and do not come under its physical description. The mention of pages should rather be mentioned in a note.
This raises a problem of consistency in the description of the resource: what exactly is described in chapter 3?

Paragraph	Page	Comments
3.4.2.2 Recording Extent of cartographic resource	27	Exceptions should not be made for cartographic resources as these exceptions induce to give indications of content in an element that corresponds to carrier. It is all the more useless if, as in the case of atlases (3.4.2.5), details on carrier are given between parentheses. In consequence, information of the same nature will not be in the same element according to the type of resource. Cf. 3.4.1.7.4 and 3.4.7.5 where, on the reverse, an indication of content is given as a subunit of the carrier. This way of doing does not facilitate the organization of data: the same type of information should be given in the same element and it is too bad if that hinders to make a pretty phrase such as "3 maps on 2 CD-ROMS".
3.4.2.3 More tyhan one cartographic unit on one or more sheets	28	"If the resource consists of two or more sheets each containing a single cartographic unit record the extent as instructed under 3.4.2.4 . If the resource consists of more than one cartographic unit on one or more sheets, and the number of cartographic units, differs from the number of sheets, record the number of cartographic units and specify the number of sheets. For Example: 6 maps on 1 sheet 8 sections on 3 sheets"

Our comment :
This rule maintains a regretful confusion between content (the map) and its material designation (the sheets).

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Paragraph	Page	Comments
3.4.2.5 Atlases	29	"Specify the number of volumes and/or pages, etc., in an atlas as instructed under 3.4.5 For Example: 1 atlas (3 volumes) 1 atlas (xvii, 37 pages, 74 leaves of plates) 1 atlas (1 volume (various pagings))" **Our comment** : Here in the examples a punctuation (parentheses) can be seen that makes a rule but on which nothing is clearly and explicitly indicated. As it is presented this example then avoids the analysis of the different elements of the material designation and maintains the confusion between information on the content (atlas is a form of cartographic work) and the material designation. In 3.4.5 where prescriptions relating to printed resources in the form of leaves, volumes, etc. are gathered, no punctuation appears.
3.4.3 Notated music	30	Reference to 3.4.2 is incorrect.
3.4.3.2 Recording extent of notated music	30	"Record the extent of a resource consisting of a notated music by giving the number of units and an appropriate term for the format of notated music as listed under 7.20.1.3 . If the resource consists of more than one type of unit, record the number of each applicable type in the order listed under 7.20.1.3. Specify the number of volumes and/or pages, leaves, or columns as instructed under 3.4.5, in parentheses, following the term designating the format of notated music. For Example: 1 score (38 leaves) 1 vocal score (x, 190 pages) 1 condensed score (2 volumes) 1 score (23 pages) 1 piano conductor part (8 pages) 1 choir book (240 pages) 1 table book (50 unnumbered pages)" **Our comment** : Where is the music format (area 3 of ISBD) indicated, according to RDA? We do make the same remarks as already made: the information relating to the carrier should be in the same element as for the other types of resources and not be treated as extent. See our remark on 3.4.1.3. One more time there is a confusion between information relating to the content (score, etc. qualifies an expression) and the material designation. Here in the examples a punctuation (parentheses) can be seen that makes a rule but on which nothing is clearly and explicitly indicated.
3.4.4.2 Extent of still image	31- 34	Here there is confusion between the typology that comes under content, for instance "poster", "technical drawing" and the technique itself

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Paragraph	Page	Comments
		(drawing, photograph) that applies really to material designation.
3.4.4.2 Extent of still image	33	"If the exact number of units is not readily ascertainable, give an estimated number preceded by *approximately*."
		Our comment : In the perspective of web catalogues, then available by users ignoring the language used in the catalogue, the approximation should be expressed by the international abbreviation "ca" or by a question mark "?" rather than by the term "approximately".
3.4.5 Extent of text 3.4.5.2 Single volume:	35	"For a resource consisting of a single volume, record the extent in terms of pages, leaves, or columns as appropriate to the presentation used in the resource, applying the following general guidelines: …"
		Our comment : Why not always indicate the material designation and record "1 volume" in order to be consistent with the material description of other types of material designation?
3.4.5.2 Single volume:	36	1st "FOR EXAMPLE 1 volume (loose-leaf)"
		Our comment : If it can be recorded "1 volume" when this volume is a loose-leaf why not do the same when it is not loose-leaf and so, be consistent with material description of other types of material designation.
3.4.5.3 Unnumbered pages, leaves, or columns	37	"c) record 1 volume (unpaged)."
		Our comment : If it can be recorded "1 volume" when this volume is unpaged why not do the same when it is paginated and so, be consistent with material description of other types of material designation.
3.4.5.5 Misleading numbering	41	"When correcting misleading numbering, record the numbering as it appears on the last page or leaf followed by that is and the correct number. For Example: 48, that is 96 pages 329, that is 392 pages"
		Our comment : ISBD (0.9 and 5.1.4.1.4) intends to use the international abbreviation "i.e." and to give the added mention between brackets. For international understanding of records, it is largely preferable to an indication such as "which is" in the cataloguing language. The record thus becomes unreadable when this record is in a language unknown from the user – which is contrary to the principles of ISBD.

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Paragraph	Page	Comments
3.4.5.8 Complicated or irregular paging, etc.	43	« c) record 1 volume (various pagings). For Example: 1 volume (various pagings) resource with 1000 Pages in Various Pagings » **Our comment** : If it can be recorded "1 volume" when this volume has different sequences of pages, why not do the same when it contains only one sequence of pages and so, be consistent with material description of other types of material designation.
3.4.5.12 Duplicated paging	45	"If the paging is duplicated, as is sometimes the case with books having parallel texts, record both pagings and make an explanatory note (see 3.4.5.8). For Example: xii, 35, 35 pages For Example: Bilingual Dictionary with English to French Terms Followed by French to English Terms Separately Paged xi, EN185, FR189" **Our comment** : The 2nd For example is very surprising. There should be at least a comment explaining that the specification of the language associated to the pagination appears on the resource.
3.4.5.18 Individually paged volumes	49	"If the volumes are individually paged, record the number of volumes and omit the pagination." *Optional addition* Specify the number of pages, leaves, or columns in each volume as instructed under 3.4.5.2-3.4.5.13, in parentheses, following the term designating the type of unit." **Our comment** : We agree and appreciate the flexibility of this *optional addition* that allows a precise collation but does not oblige to do it.
3.5 **Dimensions** 3.5.1 Basic instructions on recording dimensions		
3.5.1.4.2 Cartridges **3.5.1.4.3** Cassettes	54- 56	In these two paragraphs 3.5.1.4.2 and 3.5.1.4.3 dimensions of things that do not go together are mixed up. 8 or 16 or 35 mm that are the width of films, have an action on the technical quality of the audiovisual content (as the playing speed of an analogical disc or of a tape). On the reverse, the dimensions of a cassette describe a standard material designation. Once more time, what is the use to record dimensions that are standard for a given type of "carrier" (dimensions of a video cassette, width of the tape of video cassettes)? In these paragraphs too, RDA introduces a punctuation that makes a

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Paragraph	Page	Comments

rule when it was stated that punctuation in RDA will be limited to display conventions.

3.5.1.4.4
Discs

57

"Record the diameter of the disc."

Our comment :
If "CD audio", "CD-ROM", etc. has been recorded, it is useless to precise 12 cm when, in the great majority of case, they are standard.

3.5.1.4.14
Dimensions.

62

These rules have no value for early printed books.
And, since the paragraph 3.12 Book format (page 98) is mandatory for early printed books, why not substitute it to 3.5.1.4.14 for this case?

3.5.1.6
Resources consisting of more than one carrier

64

"Exceptions:
Unbound texts. For texts consisting of two or more unbound sheets, apply the instructions on recording the dimensions of a volume as given under **3.5.1.4.14**. If **the manuscript** is kept folded, add the dimensions when folded."

Our comment :
 "Unbound texts" are not obligatorily manuscripts: replace "the manuscript" by "the resource" or by "the text".

3.5.1.6
Resources consisting of more than one carrier

66

"Notated music.
For notated music, if the resource consists of more than one carrier of differing sizes, record the dimensions of each carrier containing a different type of unit in the order in which the units are listed under **3.4.3.3"**

Our comment :
Are there no other means to link each carrier with its dimensions?

3.5.2.4
Map, etc., in segments designed to fit together

69

 "If the map, etc., is on one or more sheets in two or more segments designed to fit together to form one map, etc., record the dimensions of the complete map, etc., followed by the dimensions of the sheet or sheets. Separate the dimensions by a comma and precede the sheet dimension with *on* unless the number of sheets is recorded in the extent (see **3.4.2.4**). If If the segments have been assembled and mounted together, record the dimensions of the whole map, etc., alone."

Our comment :
Instructions here are complex ("*separate the dimensions by a comma and precede... with* on *(unless the number of sheets is recorded in the extent)...")* and not very convenient for an exchange of records as the same information may be given in two different elements.

 "*If the segments have been assembled and mounted together":* does this not come under a specific characteristic of the item? The instruction should refer to what is to be done according to the instructions given by the publisher ("*if the segments are intended to be mounted..."),* and not to what has been or not done by the custodian.

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Paragraph	Page	Comments
3.6.1.3 Recording Base Materials	74	In what does "illustration board" come under material?
3.7.2 Emulsion on Microfilm and Microfiche	80	
3.7.2.1 Scope	80	"Emulsion on m icrofilm and microficheis a suspension of light-sensitive checmicals used as a coating on a microfilm or microfiche (e.g., silver halide)." **Our comment** : 1st line : delete space internal to « microfilm » ; add a space between « microfiche » and « is »
3.9.1.3 Recording Production Methods	84	***"Exceptions:*** *Manuscripts.* Record the method of production for manuscripts as instructed under **3.9.1.4** . *Tactile resources.* Record the method of production for tactile resources as instructed under **3.9.1.5**." **Our comment** : Rectify reference 3.9.1.4 in 3.9.2 and reference 3.9.1.5 in 3.9.3.
3.10 **Generation**		
3.10.1.1 Scope	88	"Generationis the relationship between an original carrier and the carrier of a reproduction made from the original (e.g., a first generation camera master, a second generation printing master)." **Our comment** : Add a space between "Generation" and "is the relationship"
3.11 **Layout**	93-98	
3.11.1.3 Recording layout	94	"Exceptions: Cartographic images. Record the layout of a cartographic image as instructed under 3.11.1.4". **Our comment** : The correct reference is "3.11.2.3"
3.12 **Book format**	98-99	
3.12.1.3 Recording book formats	98	"Record the book format of an early printed book, etc., using an appropriate term from the list below. Record details of the book format if they are considered important for identification or selection. folio 4to 8vo 12mo 16mo

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Paragraph	Page	Comments
		24mo 32mo 48mo 64mo"
		Our comment : Other ways exist to record bibliographic formats for early printed books. RDA should be more open and follow the ISBD that says: "For older monographic resources: The bibliographic format of the resource is given in a standard designation as chosen by the cataloguing agency, e.g. in one of the following forms: ; 1o, 2o, 4o, 8o, 12o etc. ; 1:o, 2:o, 4:o, 8:o, 12:o etc. ; 1mo, 2do, 4to, 8vo, 12mo etc ; in-plano, in-fol./in-2, in-4, in-8, in-12 etc."
3.16 Sound characteristics	103	The specification "mono-sided" and "double-sided" for DVDs appears nowhere.
3.16.1.3 Recordind sound characteristics	103	1st & 2nd indents are identical
3.16.2 Type of recording	104	In a general way, the type of original recording comes under expression and should appear in the chapter 7 (1st letter of 3, as ADD, DDD, ...). On the reverse, master and medium come under manifestation (2nd and 3rd letters). Should not the difference *acoustic/electric* be also indicated for early sound recordings ?
3.16.3 Recording medium	105	"Scope Recording medium is the type of medium used to record sound on an audio carrier (e.g., magnetic, optical)." **Our comment** : What is exactly indicated here? The scope should be more precise.
3.16.4 Playing speed	106	What is the use of these instructions for a CD? If CD-audio" is, one could avoid to record the details associated with the standard. See our remark on 3.3.1.2.
3.16.5 Groove characteristic	108	We do not find the distinctions between groove directions (vertical/lateral) that are essential in the case of early sound discs.
3.16.8 Configuration of playback channels	111	Mono/stereo come rather under expression: if a recording is originally mono, it could be difficult to make a stereo manifestation! ! ! Yet in chapter 7, it is only referred to sound for moving images (mute/talking).

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Paragraph	Page	Comments
3.18.1.1 Basic instructions on recording video characteristics scope	116	The references are not the good ones.
3.18.3.1 Scope	119	"Broadcast standard a system used to format a video resource for television broadcast." **Our comment** : This sentence lacks the verb "is".
3.19.1 Basic Instructions on Recording Digital File Characteristics 3.19.1.1 Scope	120	**"Digital file characteristics** are technical specifications relating to the digital encoding of text, image, audio, video, and other types of data in a resource. Digital file characteristics include file type, encoding format, file size, transmission speed, data type, object type, number of objects, density, sectoring, etc. For instructions on recording the colour characteristics of a digital file, see **3.12** . For instructions on recording other sound characteristics of a digital file, see **3.16** . For instructions on recording other video characteristics of a digital file, see **3.18**." **Our comment** : The organization that is retained here scatters the characteristics of sound recordings or of videograms between electronic resources (for DVD) and sound recordings (in 3.1.6) or else videos (3.18.2) with multiplication of references. Reference to 3.12 is incorrect.
3.19.4 Regional encoding 3.19.4.1 Scope	126	"Regional encoding a code identifying the region of the world for which a DVD videodisc has been encoded and preventing the disc from being played on a player sold in a different region." **Our comment** : This sentence lacks the verb "is".
3.19.7.3 Recording digital representation of cartographic data	128	1st indent, list: "For digitally encoded cartographic data, record the following information if it can be readily ascertained and is considered important for identification or selection: • data type (i.e., raster, vector, or point) • object type (i.e., point, line, polygon, or pixel) • number of objects used to represent spatial information." **Our comment** : It should be useful to have definitions, for "data type (i.e., raster, vector, or point)"; "object t "object tpe (i.e., point, line, polygon, or pixel); "number of objects used to represent spatial information", either

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Paragraph	Page	Comments
		in this paragraph or in the glossary where there are entries but without a definition.
3.21.1.3 Recording item-specific carrier characteristics	132	2nd indent "Record details of the library's holdings of a serial, integrating resource, or multipart monograph if those holdings are incomplete." **Our comment** : We would suggest to enlarge the viewpoint and replace the term "library" by that of "institution" or some equivalent term to indicate the custodian corporate body.
3.22 **Note**	134- 141	Some of these notes (and all, if possible) should gain to be described in the paragraphs to which they refer rather than to be gathered at the end of the chapter.
3.22.2.9 Early printed resources	137	The signatures could be considered as an element per se.

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Chapter 4
Providing Acquisition and Access Information

Paragraph	Page	Comments
4.2.1.2 Recording terms of availability	2	"Record the terms on which the resource is available. These terms consist of the price (recorded in numerals with standard symbols) if the resource is for sale, or a brief statement of other terms if the resource is not for sale. For Example: £8.99 £6.99/$11.99 Free to students of the college For hire £0.50 per issue $6.45 per year Not for sale, for promotion only Rental material" **Our comment** : Use the symbols standardized at the international level in ISO 4217, for instance USD, CAD, etc. that are universally known to users as they are displayed in any exchange office.

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Chapter 5
General Guidelines on Recording Attributes of Works and Expressions

Paragraph	Page	Comment
General comment on Chapter 5		Sources : See also our general comments on chapter 6 See our comments on Memorandum (5JSC/LC/12) § 6.15.1.2. About the practice of Wikipedia, The JSC answered to our previous comments : "RDA does not specify sources to consult and the Wikipedia is not the major source to be used". Netherthless, mention Wikipedia several times in the examples and especially in the last complete examples give it weight. At least, it is essential to quote exactly the entry and to give the date of the consultation in a standardized form : This is not done for example in 5.8.1.3, p. 7 : « Wikipedia, viewed on December 7, 2007 (Ginza Rba (in Mandaic, which translates into The Great Treasure) or Siddra Rba ».
5.1.2 Work and expression ***		We have noted JSC's answer to our previous comment : "..It is hoped in the future that the data about a work will be linked to the data at the expression level and further data at the manifestation and item levels, avoiding redundant information." However, it should be clarified if the definition of the expression includes also sound recordings ? That would reduce considerably the description of the manifestations. But, it is essential to distinguish clearly the two levels in RDA, especially in the examples. *Comment already made in March 2008* *(general comment in the previous draft)*
5.1.4 Access point	2	"The preferred access point representing a work or expression is constructed using the preferred title for the work preceded by the preferred access point representing a person ..." "A variant access point … is constructed using a variant title for the work preceded by the preferred access point representing a person ..." **Our comment**: The approach is excessively formal and too restricting. We would prefer to say that a title matches with an author name or is in relation with him. Is it possible to replace "preceded by" with "associated with" or "paired with » for example ? Nevertheless every library should have the capacity to pair off data as needed.

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Paragraph	Page	Comment

New version of a comment already made in March 2008 (paragraphs5.3 in the previous draft)

Paragraph	Page	Comment
5.2 Functional objectives and principal	3	"The data recorded to reflect the attributes of a work..."

Our comment:
Could you define the meaning of « attribute » in RDA?. It does not appear in the Glossary.

Representation
"The title designated as the preferred title for a work should be (in order of preference) the title most frequently found in resources embodying the work in its original language, the title as found in reference sources, or the title most frequently found in resources embodying the work. Other titles found in resources embodying the work or in reference sources, or that the user might be expected to use when conducting a search, should be recorded as variant titles."

Our comment:
The proposed order of sources is not suitable for titles of musical works.
See our comment in *Memorandum* (5JSC/LC/12) § 6.15.1.2.

***

The paragraph about the « language preference » (in ex 5.2.5) which was in the previous draft was deleted.
For non significant titles of musical works and expressions, it is the language of the agency which is chosen (voir 6.15.2.5)

| 5.3 Core elements | 3 | « When the preferred title is recorded as part of the preferred access point representing the work, **precede it**, if appropriate, by the preferred access point representing the person...,» |

See also our general comments on 5.1.4

| 5.3 Core elements | 4 | **Core Elements** |

"Record the elements either as additions to the access point representing the work, as separate elements, or as both.
• Form of work
• Date of work
• Place of origin of the work
• Other distinguishing characteristic of the work
• Medium of performance (*for music*)
• Numeric designation (*for music*)
• Key (*for music*)
• Signatory for a treaty, etc."

Our comment :
Add to the list :
- Rite (for liturgical work)

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Paragraph	Page	Comment
		Some additional elements listed above are inseparable parts of the heading in an authority record and then cannot be recorded as « separate » elements. For titles of musical works, the French standard Z-44079 § 2.2 specifies that medium of performance and key are mandatory after every non-distinctive title and not only to differentiate homonyms. The numeric designation (number of thematic index or opus) is an identifier for the work and is mandatory in all cases (distinctive titles or not-distinctive, homonyms or not). Form, date and place of origin are added only for works with the same title.
		"When recording data identifying an expression, include as a minimum the elements listed below that are applicable to that expression. • Identifier for the expression • **Content type**" **Our comment :** Could you give examples of expressions with element « Content type ». *Comments already made in March 2008 (paragraphs 5.3.2 in the previous draft)*
5.5 Preferred access points representing works and expressions	5	" If applicable, construct the preferred access point representing the work by combining (**in this order):** a) the preferred access point for the person... b) the preferred title for the work" See also our general comments on 5.1.4
5.6 Variant Access Points Representing Works and Expressions	6	« Construct a variant access point to represent a **compilation** of works aplying the instructions given under 6.27.4.3 » **Our comment :** We disagree to consider a compilation as a work or even as an expression. See also our general comments on chapter 6 . *Comment already made in March 2008 (general comment on Chapter 6 in the previous draft)*
5.9 **Cataloguer's Note**	10	**Our comment :** In spite of JSC's answer to our previous comment, the examples always mix annotatations useful for other cataloguers and annotations which can help final users.

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Paragraph	Page	Comment
		The first example (Don Giovanni) with reference to a point of RDA is useful for professionals (but unnecessary since the resort to the standard is the rule in all cases)
		The examples 4 (Consider this and Polska...) and 6 (...Bible. Gospels...), formulated differently could be notes for final users.
		The two following examples are compressed : « Commonly known in film reference sources under title Mon oncle Not the same as FAO animal production and health paper »
		'The example : "Commonly known in film reference sources under title Mon oncle" : If "Mon oncle" is the preferred access point", this note is useless since it follows the general instruction.

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Chapter 6
Identifying Works and Expressions

Paragraph	Page	Comment
General comments on Chapter 6		Keep specific parts for religious works and legal works does not seem justified for us.
		General comment already made in March 2008
****		Answer of JSC to our previous comments : ***"Anonymous works and works with known author(s) :** We have also not discussed your comments on using the form of title found in IFLA Anonymous Classics. Anonymous Classics **could** be included in the list of sources to be maintained on the JSC website. »* **Our comment :** *IFLA Anonymous classics* as an international list is a major source. As such a list should (and no « could ») be included in the list of sources to be maintained on the JSC website. » *General comment already made in March 2008*
****		For liturgical works, the major source is : *List of uniform titles for liturgical works of the Latin rites of the Catholic Church, 2nd ed., 1981.* See our comment under 6.23.2.8. We notice that the choice of the component elements of the preferred access point for a work or an expression is rather frequently made after the physical presentation of the resource embodying the work, or the expression of the work, (i.e. based on the editorial choice of presenting these elements on the manifestation) and not according to absolute intellectual criteria allowing to accurately identify the work or the expression. *General comment already made in March 2008*
***		We disagree to consider a compilation made by a publisher as a work or even as an expression. As such no authority record should be created for them. These are manifestations for which we refuse to create factitious works. *General comment already made in March 2008*
6.2.1.5	5	"When recording a title for a work, record numbers expressed as numerals or as words in the form in which they appear on the source of information." *Comment already made in March 2008* *(paragraph 5.5.2.1 in the previous draft)*

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Paragraph	Page	Comment
		Our previous comment: A certain amount of liberty would be preferred when referring to Music Titles as the script of the document is not relevant if the number heads first before the title shown. According to the French standard **Z 44-079 "Documentation – Cataloguing – Form and Structure of Headings for Uniform Titles for Musical Works"**, the title is given with letters or numbers whether it is significant or not. It is a cardinal number expressing the number of works. Script is to be followed when the number is shown within the title. A number located within a title must be transcribed as mentioned in the reference material. *JSC: The JSC has not discussed your comments on this issue. The RDA instructions are to transcribe information <u>as it appears on the source</u>* **Our comment** : We disagree with this choice for the source of information (See our comment on *Memorandum* (5JSC/LC/12) § 6.15.1.2)
6.2.1.7 Initial articles ****	6-7	We insist on the requirement to maintain the initial article in titles of works and expressions. The constant omission of the initial article leads to grammatical monstrosities, especially when there is an enumeration. [Le] Rouge et le noir [The] Good, the bad and the ugly [A] Thing or two about music mais aussi dans d'autres cas où l'article semble essentiel [Le] Monde (Paris. 1944) [Le] Cid In some languages the omission of the initial article may alter the meaning of a word. In German sometimes it may be erroneous. According to the JSC answer to our previous comments, you seem to agree with this point : *« Initial articles:* The JSC decided that these instructions would remain as a concession to the current state of many library management systems. However, we agree that change is desirable and this issue has been added to the list of <u>Issues deferred until after the first release of RDA</u> (5JSC/Sec/6)." Then, the paragraph 6.2.1.7 and the examples should be amended : « Enfant et les sortilèges not L'enfant et les sortilèges » *New version of a comment already made in March 2008 (paragraph 5.5.4 in the previous draft)*
6.2.1.9 Abbreviations	8	Example : *«*Konzert über ein Thema von Joh. Seb. Bach »

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Paragraph	Page	Comment

Our comment :
It would be better to give the full form of forenames, unless the work is mentioned in reference sources.

| 6.2.2.2, 6.2.2.4 and 6.2.2.5 Preferred title for the work : sources of information | 8-11 | **Our comment :**
Distinction between works earlier 1500 and later 1501 for the source of information is not judicious and uselessly complicated. It is always better to give priority to reference sources.

Comment already made in March 2008
(paragraph 6.0.2.2 in the previous draft) |

| 6.2.2.2 Sources of Information | 8 | « Determine the title to be used as the preferred title for a work created before 1501 from modern **reference** sources. If the evidence of modern reference sources is inconclusive, use (in this order of preference):
a) modern editions
b) early editions
c) **muanscript** copies. (correct it) » |

Our comment :
We have noted that "modern sources" was changed in "modern reference sources". Nevertheless, we maintain our previous request of integrate these modern references sources into the list in order to prevent the cataloguer does neglect them if he does not read the introduction :

Proposal :
Determine the title to be used as the preferred title for a work created before 1501 from ~~modern~~ the sources below ~~If the evidence of modern reference sources is inconclusive, use~~ (in this order of preference):
    a) modern references sources
    b) modern editions
    c) early editions
    d) manuscript copies.

Comment already made in March 2008
(paragraph 6.2.0.2.2 in the previous draft)

| 6.2.2.5 Works created before 1501 | 11 | "For works created before 1501, choose the title or form of title in the original language by which the work is identified in **modern sources** as the preferred title. If the evidence of modern reference sources is inconclusive, choose (in this order of preference) the title most frequently found in:
a) modern editions
b) early editions
c) manuscript copies. » |

Our comment :
 "modern sources" was not corrected in "modern reference sources" as in 6.2.2.2

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Paragraph	Page	Comment

We do the same request of integrate these sources in the list.

| 6.2.2.5
Works created before 1501 | 12 | Classic and Byzantine Greek works : |

Our comment :
Why not adopt the same reasoning as regards the works of Greek and Latin Antiquity and patrology ? Instructions are given to record Latin works in the original language Greek and works in the language preferred by the agency.
We propose to adopt the same approach in both cases:
- Either record in the language preferred by the agency
- Or record in the original language
- Or record in both cases the Latin form (given that for nearly 99% of Greek works there is an attested Latin form) as is the proposal of RDA for cases in which no English form exists

Comment already made in March 2008
(paragraphs6.2.2.1 and 6.2.2.2 in the previous draft)

| 6.2.2.5
Works created before 1501 | 12 | "Exemple
Ecclesiastical history
not Ekklēsiastikēs historias" |

Our comment :
"Ekklēsiastikēs historias" is incorrect (form in the genitive).

The example was exact in the previous draft : Ekklesiastike historia.

| 6.2.2.5
Works created before 1501 | 14-
15 | "If there is neither a well-established title in the language preferred by the agency creating the data nor a Latin title, choose the Greek title." |

Our comment :
There exist Latin titles for the following works (Reference information source: DOC / Vittorio Volpi, 1994).

"Synopsis historike
(*Preferred title for work by Constantine Manasses*)
Georgos
(*Preferred title for work by Menander of Athens*)
Perikeiromene
(*Preferred title for work by Menander of Athens*)
Katamyomachia
(*Preferred title for work by Theodore Prodromus*)"

There is a typographic error in the last example: Katamyomachia = Katomyomachia

Comment already made in March 2008
(paragraph 6.2.2.2.3 in the previous draft)

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Paragraph	Page	Comment
6.2.2.6 Cycles and stories with many versions	15- 16	We propose the following title for this section : **Cycles and works with several versions** Record the names of the cycle in conformity with IFLA Anonymous classics and not after the resource described. (see also our general comment not to construct the preferred access points for works after the manifestation embodying these works) 　　　⮌record: 　　"Cycle de Guillaume d'Orange" 　　and not 　　"Guillaume d'Orange" (just as you have "Ulster cycle" (LC authority), "Baal cycle" (LC authority), "Cycle des Lorrains" (BnF authority), "Geste Rainouart" (IFLA Anonymous classics) comment on "Guillaume d'Orange" : 　o　the component titles of the cycle should be given in modern spelling 　o　the list of works composing the cycle is not complete: ➜ add "etc." if this example is maintained *Comment already made in March 2008* *(paragraph 6.2.3 in the previous draft)*
6.2.2.6 Cycles and stories with many versions	16	"If the cycle is only identified by a descriptive phrase (e.g., "the Arthurian romances," "the Grail legends," "the St. Francis legends") or has no established title, use the title proper of the first resource received as the preferred title for the work." 　　Légende arthurienne 　　(First Resource received : La légende arthurienne : études et documents ...les plus anciens textes) » **Our comment:** The example is not correct, "Légende arthurienne" is but a generic title coined by the author of the resource described and not the title of the first resource received for the cycle. The form retained by IFLA, Anonymous classics is : "Romans de la Table ronde" *Comment already made in March 2008* *(paragraph 6.2.3.1.2 in the previous draft)*
6.2.2.6 Cycles and stories with many versions	16	« For a basic story found in many versions, choose as the preferred title the title that is established in **reference sources** in the language preferred by the agency creating the data. Example : Reynard the Fox Amis et Amiles »

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		Our comment : The form : Amis et Amiles corresponds to old French. The preferred title must be : - either **Amis and Amiloun** : english form retained by « IFLA, Anonymous classics » - or **Ami et Amile**, modern form in French. *Comment already made in March 2008* *(paragraph 6.2.3.2 in the previous draft)*
6.2.2.7 Manuscripts and manuscript group	16-17	"a) a title that has been assigned to the work subsequent to its creation or compilation exemple : "Codex Amiatinus" **Our comment:** It would be necessary to add an explanation in order to justify the presence of this example in this section. Bible is the work, Vulgate the expression and Code Amiatinus an item. Is it considered here as a work because of his picture? *New version of a comment already made in March 2008* *(paragraph 6.2.4 in the previous draft)*
6.2.2.7 Manuscripts and manuscript group	17	"c) …If the manuscript is a single item within a collection, add the **foliation** if known." **Our comment:** It is not specified whether the manuscript identifiers are always given in their full form (as in the examples) or whether the cataloguer may abridge them. Cod. Cap. 74 ? Cap. 74? or Codice Capponiano 74 ? Capponiano 74 ? *Comment already made in March 2008* *(paragraph 6.2.4.1 in the previous draft)*
6.2.2.8 Incunabula	17-18	**Our comment**: The denomination « Incunabula » corresponds to a document published at a certain period and not to a type of work. ➔No specific case should be made of them as far as the construction of the access points is concerned. The example « De viris illustribus urbis Romae » of Pline has to be recorded as a Latin work, according to the guidelines in 6.2.2.5, just like « De bello Gallico ». *Comment already made in March 2008* *(paragraph 6.2.5 in the previous draft)*
6.2.2.9 Recording the preferred	18	« Apply the additional instructions given under **6.2.2.10–6.2.2.12** when recording the preferred title for part of a work. »

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title for a work		Refer only to **6.2.2.10**.
		« Apply the additional instructions given under **6.2.2.13–6.2.2.16** when recording the preferred title for a compilation of works. »
		Refer only to **6.2.2.11**.
		For additional instructions on recording the preferred title for special types of works, see 6.15.1 (musical works), 6.20.1 (legal works), and **6.29.1** (religious works).
		Correct the third reference in **6.23.1** (religious work).
6.2.2.10.2 Two or more parts	22	"When recording the preferred title for a sequence of two or more consecutively numbered parts of a work, each of which is **identified** only by a general term and a number, record the designation of the parts in the singular followed by the inclusive numbers of the parts recorded as numerals. » **Our comment :** A general term or a number are not themselves sufficient elements to identify a title of work. The computer information systems allow to manage them as qualifiers when establishing a relation between the described manifestation and corresponding work or expression. "Exemple : Book 1–6 Preferred title for the first six books of Homer's Iliad » **Our comment :** The singular « book » or « chapitre » is grammatically incorrect. The whole chapters 1 to 6 of Iliad have neither particular title nor autonomy and do not form a work. It is just a grouping made by a publisher therefore a manifestation.
6.2.2.11 Recording the preferred title for a compilation of works	23	« Record the preferred title for a compilation of works applying the instructions given under **6.2.2.14–6.2.2.16**, as applicable. » **Our comment**: The reference to 6.2.2.14-6.2.2.16 is erroneous.
6.2.2.11.2 Complete works in a single form	24	« If the compilation consists of two or more but not all the works of one person, family, or corporate body in a particular form, apply the instructions given under **6.2.2.16**. » **Our comment**: The reference to 6.2.2.16 is erroneous.
6.2.3.4 Alternative linguistic form	26- 28	**Our Comment :** Some examples are losing their relevance and usefulness because

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of title for the work		they mix languages and scripts. Example : Manuscript. Волоколамское собрание no. 630 Russian transliterated form recorded in preferred title: Manuscript. Volokolamskoe sobranie no. 630. A manuscript in the collection of the Rossiĭskai a naùsional nai a biblioteka Besides, the presentation of the title is not standardized: the first element should be the name of the library in Cyrillic letters followed by a full stop then by the mention "Manuscript" also in Cyrillic letters.
6.2.3.5 Other variant title for the work	29	"Exemple Encyclopædia Britannica Films presents Historical America in song Preferred title recorded as: Historical America in song" **Our comment**: Introducting words to the title of work do not constitute a form needing a variant. Besides, it would be in contradiction with the prescriptions in 2.3.1.6.: « Introductory Words, etc. Do not transcribe words that serve as an introduction and are not intended to be part of the title. For example: Sleeping Beauty Source of information reads: Disney presents Sleeping Beauty »
6.3-6.10 Additional elements General	31- 49	**Our comment**: RDA does not give instructions about the order of choosing elements to distinguish two homonymous works. What do we choose in priority ? date, form, etc. ? The examples are not sufficiently clear since similar cases are treated in a different way : For example, p. 32 : The form has been retained : "Exemple Motion picture Form of work of: Ocean's eleven. A film released in 2001. Form recorded to differentiate this work from other works with the same title » And p. 36, The date has been retained : "Exemple 2004 Date of release of the motion picture Harry Potter and the prisoner of Azkaban" In the second example, why have not choosen « Motion picture » for distinguish the film and J. K. Rowling's book ?

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		The date is only useful to distinguish a first film with a second with the same title.
6.3 Form of work 6.3.1.3 Recording form of work	33	"Form of work is required when needed to differentiate a work from another work with the same title" **Our comment**: Complete the phrase : "...with the same title **or from persons with the same name or corporate bodies with the same name."** This to justify the presence in 6.3.1.3 of the last three examples which differ of the previous in the list since they distinguish titles of works from names of persons and names of corporate bodies. Besides, in the following example, there is only homonymy because the preferred titile is not the good title. « Chanson de geste Form of work of: Guillaume. Form recorded to differentiate this work from the 13th century person known as Guillaume » **Our comment :** The preferred title should be « Chanson de Guillaume ». In the following example : « Poem Form of work of: Chanson de Roland. Form recorded to differentiate a variant title for this work, Roland, from persons known only by the given name Roland » The form qualifying the variant should be « Chanson de geste » and not « Poem ».
6.4 Date of work	33	"Date of work is required when needed to differentiate a work from another work with the same title". **Our comment :** For titles of musical works, date is used at the level of the work to distinguish several versions of the same work or homonymous works of the same composer and not to distinguish homoymous works of different authors. Examples in the French standard Z-44079 § 2.3.2.1 : Brunetti, Gaetano. – [Quatuors (6). Cordes (1789)] Brunetti, Gaetano. – [Quatuors (6). Cordes (1791)]
6.4.1. Basic instructions on recording Date of work	34- 35	"Date of work is the earliest date (normally the year ») associated with a work. In our previous comment, we have suggested to add : "for **modern**

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works":

JSC : The RDA wording is consistent with the wording in FRAD. Please see the revised instructions in the November 2008 draft.

Our comment:
FRAD is not more precise. So, it would be really necessary in this part to distinguish modern works, for which it is normally possible to precise year, and the ancient works, for which we often know just the century.

We propose the following examples :

Anonymous classics :
Charroi de Nîmes
Date : Première moitié du XIIe s.

http://catalogue.bnf.fr/ark:/12148/cb12008395q/

Courtois d'Arras
Date : Premier quart du XIIIe s.

http://catalogue.bnf.fr/ark:/12148/cb12066900m/

Sumerian work :
Enmerkar
Date : IIIe siècle avant J.-C.
http://catalogue.bnf.fr/ark:/12148/cb15550388t/

Egyptian text :

Lamentations d'Ipouer

Texte datant vraisemblablement du début du Moyen Empire, 2000 av. J.C., dans lequel le sage Ipouer décrit l'état de l'Égypte plongée dans l'anarchie et les catastrophes qui en découlent.
http://catalogue.bnf.fr/ark:/12148/cb13560297f/

Latin poem :
Veillée de Vénus

Poème de 93 vers à la gloire de Vénus, écrit soit au IIe s. soit vers les IIIe-IVe s.

http://catalogue.bnf.fr/ark:/12148/cb15509763q

« Date of work may be the date the work was created, or the date the work was first published or released. »

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		Our comment: It would be useful to record several dates and to be allowed to qualify them to precise their nature. Besides, the part about the « date of creation » in the previous draft has disappeared but it is still ambiguous since the date of creation appears in comments to the examples p. 34-35. Therefore, we maintain our previous comment : The term "creation" is ambiguous in the case of musical or dramatical works, as it can designate the first performance or representation of the work, and not the date of composition or writing. The two kinds of dates should be mentioned in RDA and instructions given on the preferred order for recording these dates. *Comment already made in March 2008* *(paragraph 6.5.0.1.1 and 6.5.1in the previous draft)*
6.4.1.3 Recording Date of work	34	« Record dates in terms of the calendar preferred by the agency creating the data. »
***		**Our comment :** We agree with the choice of the calendar, BUT the date must be recorded in a standardized form in order to be understandable internationally and to allow a real chronological filing." *Comment already made in March 2008* *(paragraph 6.5.0.3.1 in the previous draft)*
6.5 Place of origin of the Work	36	**Core element** *"Place of origin of the work is required when needed to differentiate a work from another work with the same title."* **Our comment**: For titles of musical works, place of origin is used at the level of the work to distinguish several versions of the same work or homonymous works of the same composer and not to distinguish homoymous works of different authors. Example in the French standard Z-44079 § 2.3.5 : Mozart, Wolfgang Amadeus. – [Don Giovanni. KV 527 (Prague)]
6.8.1.3 Recording the History of the Work	43	Exemple « The Book of the dead » « ...The collection, literally titled "The Chapters of Coming-Forth-by-Day," received its present name from Karl Richard Lepsius, German Egyptologist who published the first collection of the texts in 1842." **Our comment** : We contest this example because it is not a certified title but a form

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of usage in English. This title was not given by the German scholar in 1842.
The 1842 edition has a German title :
Das Todtenbuch der Ägypter, nach dem hieroglyphischen Papyrus in Turin, mit einem Vorworte zum ersten Male herausgegeben von Dr R. Lepsius,..., 1842

http://catalogue.bnf.fr/ark:/12148/cb30796269d/

6.9.1.1
Scope

44

"An **identifier for the work** is an alphanumeric string uniquely associated with a work that serves to differentiate that work from other works."

Our comment :
For titles of musical works, number of thematic index, whenever it exists, is considered as an identifier for the work (See also 5.3)

6.10
Content type

45

Our comment:

"Content type" should be named "content form" in order to be in accordance with FRBR 4.3.2.

6.10
Content type

45

It would be useful to precise here that the content type is a core element of the expression. The previous elements concern the work and the linking between the different levels is not clear enough.

6.11.1.3
Recording Date of expression

***

50

"Record the date of the expression by giving the year or years alone."

Our comment :
Dates more precise than the year alone can be useful to distinguish one expression from another, for example in the case of different versions of the same opera. This possibility should be given when appropriate.

In the following examples :
« 2000
Resource described: The complete works of Oscar Wilde / general editors, Russell Jackson and Ian Small. — Oxford ; New York : Oxford University Press, 2000- . Date of expression recorded to differentiate this expression of Wilde's complete works from others »

Our comment :
Different expressions of the complete works should be distinguished by the scientific editor and not by the date.

Example :
« 1940
Resource described: Babar and his children. An audio recording of the children's story »

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Our comment :
The expression is not clearly identified in this example.
The date 1940 corresponds to what exactly ? Is it the date of the sound recording ?

Comment already made in March 2008
(paragraph 6.12.0.3.2 in the previous draft)

6.12.1.3
Recording language of
expression

51

"Record the language or languages of the expression using an appropriate **term or terms** from the list of languages specified in ISO 639-2 (http://loc.gov/standards/iso639-2/langhome.html)."

**

Our comment :
Guidelines are not clear. Should we choose the name of the language in clear or the nearest ISO 639-2 code at the upper level ?
If it is recorded in clear, the name of the language must be in the language of the Agency creating the data.
If the name of the language is to be taken from the list of languages specified in ISO 639-2, there will be a problem with dialects or languages for which a specific code do not exist in ISO 639-2 : the precise name of the language should be given (and not only a group of languages).

New version of a comment already made in March 2008
(paragraph 6.13.0.3.1 in the previous draft)

6.12.1.4
Expressions Involving
More than One Language

52

" If a single expression of a work involves more than one language, record each of the languages.

For Example :
English
Dutch
French
German
Italian
Spanish
Portuguese
Resource described: Joan Blaeu Atlas maior of 1665 / introduction and texts by Peter van der Krogt ; based on the copy in the Österreichische Nationalbibliothek, Wien ; with a selection of original texts by Joan Blaeu ; directed and produced by Benedikt Taschen. An atlas in six volumes; each volume includes text in English and two of the other languages

For example :
Greek, Ancient
Latin
Resource described: Aristotelous Peri poiētikēs = Aristotelis De poetica liber : Græce et Latine, cum notis. Greek text followed by Latin translation and notes

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For example:
Hindi
English
Resource described: Anarkali = Anārkalī / Filmistan ; directed by
Nandlal Jashwantlal. A Hindi motion picture with English subtitles

Our comment :
Under what rules of presentation and punctuation are the languages
recorded in these examples ?

6.13.1.3
Recording other distinguishing characteristics of the expression

***

54 Our previous request pointed on the term « Version ». It has
disappeared in the present draft. It is replaced by « other
distinguishing caracteristics of the expression ».

The JSC has not answered to our request to precise « if applicable »
for medieval or traditional works for which it is not always easy to
define the different versions.

Comment already made in March 2008
(paragraph 6.14 in the previous draft)

6.13.1.3
Recording other distinguishing characteristic of the expression

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56 Example :
« Baryshnikov
A version of the choreographic work The nutcracker choreographed
by Mikhail Baryshnikov in 1976 »

Our comment :
In the previous draft, this example illustrated the part "other
distinguishing characteristic of works"

We maintain our comment :
According to the French practice, the choreography of a ballet is
considered as a work in its own and the choreographer as the creator
of the work. The preferred access point is constructed by combining
in this order :
- the preferred access point for the choreographer and
- the title of the ballet

We can consider that Baryshnikov is the creator of a new
choregraphy and record his name in the access point to the work as it
is made p. 148 in the following example :
« Tudor, Antony, 1909-1987. Soirée musicale
Resource described: Soirée musicale / choreography by Antony
Tudor ; suite of movements from Gioachino Rossini, arranged by
Benjamin Britten ; notated by Ann Hutchinson Guest. Choreography
for a ballet, notated in Labanotation »
In this example, the choregraph is placed in first in the access point
to the work.

Comment already made in March 2008
(paragraph 6.7.0.3.1 in the previous draft)

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6.13.1.3 Recording other distinguishing characteristics of the expression	56	Example : « Nelson Thornes An expression of Shakespeare's complete works published in 2003 by Nelson Thornes » « Yale University Press Another expression of Shakespeare's complete works published in 2003 by Yale University Press » **Our comment**: There is probably a scientific editor responsible for these two editions of complete works. He should be choosen for distinguish the two expressions and not the publisher.
6.14 Identifier for the expression	57	**Our comment**: Examples of ISRC and V-ISAN are lacking.
6.20.4.1.2 Preferred title for a legal work : sources of information	93	See our comments on 6.2.2.2, 6.2.2.4 et 6.2.2.5 about distinction between works earlier 1500 and later..
6.20.4.1.3 Choosing the preferred title for a legal work 6.20.4.1.4 Recording the Preferred Title for a legal work	93- 94	"Exceptions : For laws, etc., apply the instructions given to **6.20.2.5-6.20.2.6** For treaties, etc., apply the instructions given under **6.20.2.7-6.20.2.8**" **Our comment**: The references are inadequate.
6.20.4.2.1 Compilations	94	« Record Laws, **etc**. as the conventional collective title..." We contest the use of « etc. »
6.20.4.3 One treaty, etc.	96	« Record Treaties, etc. » **Our comment**: For a single treaty, the plural is not justified. More, we contest « etc. » « c) the Holy See » The right term is « Concordat ».
6.20.4.4. Compilations of treaties, etc	96	"For a single treaty, etc., in the compilation, see **6.20.2.3.1**" The reference is inadequate. Exemple Treaty of Utrecht "Collective name for a group of treaties signed between 1713 and 1715 »

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		Our comment: We disapprove the form "Treaty of Utrecht", the plural form should be used "Treatises of Utrecht". See our comment on p. 245. *Comment already made in March 2008* *(paragraph 6.24.2.2.2 in the previous draft)*
6.21 Date of work	101	**Our comment**: To avoid ambiguity in the summary, complete the title : Date of the **legal** work "Date of work is required when needed to differentiate a work from another work with the same title." **Our comment**: The date should be mandatory in all cases and not only to distinguish two homonymous works.
6.21.1 Basic instructions on recording date of work **	102	**"Date of work** is the first date (normally the year) associated with a work." **Our comment**: The precision « normally the year » pertains only to modern and contemporary works. For more ancient works, the date should be as precise as possible: decade, quarter of century, century. See also our comment under 6.4.1. *Comment already made in March 2008* *(paragraph 6.26.0.1.1 in the previous draft)*
6.21.2.3 Recording Date of promulgation of a law, etc.	102	"Record the year in which a law, etc., was promulgated applying the basic instructions given under 6.21.1." *Comment already made in March 2008* *(paragraph 6.26.1.3.1 in the previous draft)* **Our previous comment**: Why not give the precise date (year, month and day) of promulgation of a law when it is known (as it is done for a treaty)? The precise date can be recorded in the description even it is not part of the preferred access point. **Our new comment :** Compilations (codes) and laws should be distinguished. For a single law, an exact and complete date is mandatory. For book of laws, year is sufficient. There are only examples of codes in this paragraph. It would be useful to give an example of a single law.

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		We suggest : Bénin [Loi. 1981-10-10] Loi organique N ° 81-009 du 10 octobre 1981, portant création, organisation, attributions et fonctionnement des organes locaux du pouvoir d'État et de leurs organes exécutifs [Texte imprimé] / République populaire du Bénin, Assemblée nationale révolutionnaire. - [Porto-Novo] : Office national d'édition de presse de publicité et d'imprimerie], [1981]. - 58 p. ; 23 cm. Corée (République populaire démocratique) [Loi. 1980-04-03] Loi sur la santé publique de la République populaire démocratique de Corée [Texte imprimé] : adoptée à la 4e session de la VIe législature de l'Assemblée populaire suprême de la République populaire démocratique de Corée, le 3 avril 1980. - Pyongyang : Editions en langues étrangères, 1980. - 16 p. ; 19 cm. Pologne [Loi. 2004-01-23] Loi du 23 janvier 2004, portant élection des membres du Parlement européen [Texte imprimé] : Dziennik Ustaw du 23 février 2004, n°25, texte 219 / [trad. par Helena Klugiel-Królikowska]. - Varsovie : Kancelaria sejmu, cop. 2004. - 110 p. ; 18 cm.
6.21.3.3 Recording date of signing a treaty, etc.	103	Record the date a treaty, etc., or a protocol to a treaty, etc., was signed following the basic instructions given under 6.26.0. Record the date in the form: year, name of the month, number of the day. 1948 March 2 1783 September 3 **Our comment**: The date should be recorded in a standardized form YYYY-MM-DD in order to be understandable in an international context. The date would be standardized : 1948-03-02 and 1783-09-03 See our comment on 6.21.2.3. *Comment already made in March 2008* *(paragraph 6.26.2.3.1 in the previous draft)*
6.23-6.25 Religious Works and expressions + 6.30 Access points	104- 135 + 254- 281	Additional instructions for religious works JSC : The JSC have not discussed your comments on these issues. We hope that JSC will be able to discuss before the release of RDA.
6.23.2.5 Sacred scripture	106	**Our comment**: Among the examples there is a text which is not a « sacred scripture » but a « founding text » : "Holy Piby"

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		So, we suggest to modify the title of the chapter : "Sacred scriptures **and founding texts**"
6.23.2.6 Apocryphal books	107	"Choose the title commonly found in sources in the language preferred by the agency creating the data as the preferred title for an apocryphal book (i.e., one included neither in the Catholic canon nor in the Protestant Apocrypha)."

Our comment:
Examples are Biblical apocryphal texts. Is the rule exclusive? If not, add apocryphal books of other religions. For example, apocryphal sutras for the Buddhism.

Comment already made in March 2008
(paragraph 6.29.2.1 in the previous draft)

| 6.23.2.8 Liturgical works | 108-109 | Exceptions Early Catholic liturgical works |

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Our comment:
Replace
"If a Catholic liturgical work compiled before the Council of Trent (1545-1563) has a close counterpart in a Tridentine work, use the Tridentine title"
by :
"If a Catholic liturgical work compiled before the Council of Trent (1545-1563) has a close counterpart in a Tridentine work, use the preferred title of the *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*, 2nd ed., 1981 for Tridentine liturgical works, in Latin or in the language of the agency."

Caution! Some pre-Tridentine liturgical works have the same title than a post-Tridentine liturgical works but are not identical, it must be clear in the explanation

Comment already made in March 2008
(paragraph 6.29.5.1.1 in the previous draft)

| 6.23.2.8 Liturgical works | 109 | "Recent catholic liturgical works Titles of Tridentine texts are not applicable to those post-Vatican II texts that vary in language and content. Where such variations exist, use the individual title of the resource being described as the preferred title." |

Our comment :
We totally disagree with this rule: the preferred titles for post-Vatican II liturgical texts must be conform to the the *List of uniform titles for liturgical works of theLatin rites of the Catholic Church*, 2nd ed., 1981.

All titles of liturgical works must be constructed on the same way :
- Title, if it is significant

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		• Rite or religious group
		It should be refer to *List of uniform titles for liturgical works of theLatin rites of the Catholic Church*, 2nd ed., 1981, which is more precise than RDA for these works which present particular difficulties. Nevertheless, the IFLA list must evolve and we have to make suggestions for that.
6.23.2.8 Liturgical works	109	"Exceptions
		Jewish liturgical works "Choose as the preferred title for a Jewish liturgical work its name as found in the *Encyclopaedia Judaica*.""
		Our comment: The source prescribed to choose the preferred title is "Encyclopaedia Judaica". This reference book is in English. In a perspective of an international code, each agency should be allowed to choose the preferred source. We wonder that there is no other rule for Jewish liturgical works. How construct the preferred title in the case of part of a whole: is the title of the part chosen as the preferred title or is it recorded as a part of the whole? Guidelines about mention of the rite are necessary. An appendix with the list of the rites and the prescribed form for this addition is needed. See **Appendix 2 Liturgical rites of the Roman Catholic Church** in our previous comment.
		Comment already made in March 2008 (paragraph 6.23.2.8 in the previous draft)
6.23.2.8	110	Example Euchologion Name of corporate body : Orthodox Eastern Church
		Our comment "Orthodox Eastern Church" does not correspond to an entity, it is a generic term to denominate all the Orthodox Churches (id est patriarchates of Constantinople, Alexandria, Antioch, Jerusalem together with their associated Churches) **Cf.** 6.30.1.6.
6.23.2.9 Parts of the Bible ****	110-111	**Our comment**: We agree with the fact that the headings "Bible. O.T." represents a Christian approach, unsatisfactory for Hebrew Bible. We also agree with the choice of fuller forms for "Old Testament" and "New Testament", instead of abbreviations, especially in a web context. BUT We disagree with the structure proposed by RDA, it presents a great disadvantage: Bible will be the heading for the corpus of Hebrew Bible and for corpus of Christian Bible.

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		We think that the distinction between Christian version and Jewish version of a book of the Old Testament could be indicated at the expression level.
		Example :
		<u>Level of the work</u> :
		Bible. Baruch
		
		<u>Level of the expression</u> :
		Bible. Baruch (Christian canon)
		Bible. Baruch (Jewish canon)
		It presents the advantage to gather books of the same religious tradition in the indexes for final users
		
		We propose "Christian **canon**" "Jewish **canon**" and not "Christian" or "Jewish" only :
		  o for consistency with page 54 "Buriat version", "Mongolian version"
		  o to avoid implicit, thinking in WEB use directly
		
		Comment already made in March 2008
		(paragraph 6.29.7 in the previous draft)

6.23.2.9.2 Books (of the Bible)	111	"For books of the Catholic or Protestant canon, record the brief citation form of the Authorized Version as a subdivision of the preferred title for the Bible". **Our comment**: We propose : "record the brief citation form of the Authorized Version (or preferred reference chosen by the national agency) as a subdivision …"
6.23.2.9.2 Books (of the Bible) ****	111	"If the resource being described is part of a book… add the chapter (in roman numerals) and verse (in Arabic numerals)…" **Our comment**: We do not see the point of creating so specific access points controlled by authority records. Besides, we do not consider that such little quotations are "works". The precision of the chapter and verse can be made at the manifestation level in recording the relation between the resource and the work embodied in this resource. *Comment already made in March 2008* *(paragraph 6.29.7.2.3 in the previous draft)*
6.23.2.9.2 Books (of the Bible)	111	« Use commas to separate the name of the book, the number of the chapter and the number of the verse or verses. » **Our comment :** Use a full stop and not a comma to separate name of the book and

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		number.

In the examples, the presentation should be :

Bible. Corinthians. 1. XIII, 12

Paragraph	Page	Comment
6.23.2.9.3 Groups of books	113	**Our comment :** Correct the presentation of the notes. We read "12 Chronicles" "12 Corinthians" etc. instead of « 1-2 Chronicles », etc.
6.23.2.9.4 Apocrypha	113- 114	**Our comment**: The word "**Apocrypha"** has not the same meaning in a catholic or protestant context. The denomination "**Apocrypha**" corresponds to Catholic "**Deuterocanonical books**" and other books (Prayer of Manasses, 3-4 Maccabees, 3-4 Esdras). What is the preferred title for a compilation of Deuterocanonical books? "Apocryphal books": what is the preferred title for a compilation? Is the preferred title "Pseudepigraphs" ? *Comment already made in March 2008* *(paragraph 6.29.7.4 in the previous draft)*
6.23.2.9.6	115	Exemple : « Bible. Gospels Resource described: Il Vangelo e gli Atti degli apostolic » **Our comment**: Correct « apostolic » in « apostoli ».
6.23.2.14 Parts of the Vedas	121	Exemples : Vedas. Atharvaveda Vedas. Sāmaveda » **Our comment**: Plural is inadequate to a sanskrit title. The title appears in the singular in « IFLA Anonymous Classics », 1964. We can refer to this list, even if it does not contain transliteration.
6.23.2.17 Parts of the Avesta	122	Avesta. Yasna. Gathas **Our comment**: Plural is inadequate to a sanskrit title. This title appears in the singular in « IFLA Anonymous Classics », 1964. .
6.23.2.18.2 Verses [of the Qur'an]	123	For Example: Qur'an. Sūrat al-Baqarah, 177 to 255

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		Our comment: Separate the two dates by an hyphen and not by « to ».
6.23.2.20.2 Offices and masses	125	The works which are treated quickly in this part are works of both musical and liturgical. "If the day is a saint's day, add only the saint's name in direct order and in the language of the preferred access point representing the saint". **Our comment**: The direct order is not satisfactory. "Example: Mass, Sainte Thérèse" **Our comment**: The example raises the problem of homonyms. We suggest to add the saint's name using the preferred access point for the saint : Mass, Thérèse de l'Enfant-Jésus (sainte) *Comment already made in March 2008* *(paragraphs 6.29.18.2 and 6.29.18.2.1 in the previous draft)*
6.24.1.4 The Bible and parts of the Bible	131	"Record the year of publication of the resource." **Our comment**: The year of publication of the resource pertains to the manifestation level (and not to the expression). *Comment already made in March 2008* *(paragraph 6.32.0.4.1 in the previous draft)*
6.24 Date of expression of a religious work 6.24.1.4 The Bible and parts of the Bible	131	"Alternative If the resource is a facsimile reproduction, identify the original and the facsimile separately, applying the instructions given under 6.30.1.2 . Add the appropriate year of publication to each." For Example: 1534 Resource described: Biblia, das ist, Ddie gantze Heilige Sschrifft deudsch / Mart. Luth. ; begnadet mit kürfurstlicher zu sachsen Ffreiheit. — Kköln : Taschen, ©2002. Facsimile of a 1534 publication" **Our comment**: See our comment under **6.30.3.2** Our analysis is that such information pertains to the manifestation level. Otherwise why this instruction about the mention of date for

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facsimile is given here and not in the general instructions? Is it specific to the expressions of the Bible?

Comment already made in March 2008
(paragraph 6.32.0.4.2 in the previous draft)

Paragraph	Page	Comment
6.24.1.4 The Bible and parts of the Bible	132	

"If the resource was published over more one year, record the earlier or earliest year"
Exemple :
1883
Resource described: La Sagrada Biblia / traducida de la Vulgata latina al español, aclarado el sentido de algunos lugares con la luz que dan los textos originales hebreo y griego, é ilustrada con varias notas sacadas de los santos padres y expositores sagrados, por d. Félix Torres Amat. — Barcelona : Montaner y Simon, 1883-1884

Our comment:
This instruction does not allow to distinguish between an edition of a single year and an edition published over more one year. It would be better to give the two dates connected by a hyphen.

Our Examples:
Bible. French. 1965
(Paris : Club français du livre)
Bible. French. 1965-1966
(Paris : Editions Planète)

We are in this part at the level of early manifestations associated with the expression and not at the level of the expression itself.

Comment already made in March 2008
(paragraph 6.32.0.4.3 in the previous draft)

Paragraph	Page	Comment
6.25 Other distinguishing characteristic of the expression of a religious work 6.25.1.4 The Bible and parts of the Bible	133	

"Record a brief form of the name of the version"

Our comment:
A list of the preferred names of the versions seems necessary.

Comment already made in March 2008
(paragraphs 6.31.0.4 and 6.32.0.4.2 in the previous draft)

In our previous comment, we had given in an **Appendix 1**, the complete list used at the BnF. We wish the integration in RDA of the preferred forms in this list **for French versions** (for example, "Port-Royal" instead of "Le Maistre" cf 6.28.3.1.1). We are ready to complete this list.

Paragraph	Page	Comment
6.26 Title of an Official Communication	136	

6.26.1.1 Scope
«... For purposes of identifying **religious** works, titles of the work are categorized as follows: »

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Paragraph	Page	Comment
		6.26.1.3 General Guidelines on Recording Titles of **religious** Works.

Our comment :
Replace « religious works » by « official communications »

Paragraph	Page	Comment
6.26.3.5 Recording other variant titles for official communications	140	Exemple Papal election decree Preferred title recorded as: In nomine Domini

Our comment:
We contest the preferred title :
« In nomine Domini » is an incipit and not a title.

Paragraph	Page	Comment
6.27.1.3 Collaborative works	144	"Alternative Include in the preferred access point representing the work the preferred access points for all creators named in resources embodying the work or in reference sources (in the order in which they are named in those sources), formulated according"

Our comment:
This rule risks to pertub index.

Paragraph	Page	Comment
6.27.1.4 Compilations of Works by different Persons, families, or Corporate Bodies	150- 151	"If the compiler is not considered the creator of the work, construct the preferred access point representing the work using the preferred title for the compilation, formulated according to the instructions given under **6.15.2**" For Example: Best of Broadway Resource described: The best of Broadway. A set of five CDs with selections from original cast »

Our comment:
It is not a work but a manifestation which gathers three works of different composers, without collective title. The title has been devised by the cataloguer. It is not necessary to construct an access point to the whole as a single work.

"If the compilation lacks a collective title, construct separate access points for each of the works in the compilation."
« *Alternative*
Instead of (or in addition to) constructing access points for each of the works in the compilation, construct a preferred access point for the compilation using a devised title formulated according to the instructions given under **2.3.9**
For Example :
Three Norwegian symphonies"

Our comment:
We agree with constructing access points for each of the works in the compilation, but not with constructing a preferred access point for the title devised by the cataloguer for the manifestation.

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Paragraph	Page	Comment
6.27.1.5 Adaptations and revisions	152	« Example: Hines, Earl, 1903-1983. Indispensable Earl Hines A selection of recordings by the jazz pianist, with various accompanying musicians, of music by various composers » **Our comment :** The example does not illustrate the chapter since it is a compilation of recordings of a jazz pianist, not an adaptation. This is still a manifestation and not a work.
6.27.1.8 Works of uncertain or unknown origin	155	"If the work has been attributed to one or more persons, families, or corporate bodies, but **there is uncertainty as to the probable person**, family, or body responsible, …" : If reference sources indicate that **one person, family, or corporate body is probably responsible** for creating the work…" "If the person, family, or corporate body responsible for the work **is unknown,** or **if the work originates from an unnamed group**, …" *Comment already made in March 2008 (paragraphs 6.1.1.6, 6.1.1.6.1, 6.1.1.6.2 and 6.1.1.6.3 in the previous draft)* Our previous comments were not discussed by the JSC : 1) Modify the order of the parts : move 6.1.1.6.3 on the top. 2) In 6.1.1.6.3 for clarification purposes, it would be preferable to deal separately with each of the two mentioned cases: the "unknown" and the "unnamed group" 3) Generally speaking, the guidelines proposed in 6.1.1.6 appear to be based upon very formal and schematic principles. **New comment** (2009): This approach is not sufficiently nuanced. It does not account for the presumed author. Only a note in RDA allows to express this nuance which does not exist in the Relationship designator neither. See our comment under en 18.6. We find it useful to give some examples illustrating our practices, issued from the Authority file of the BnF: - for a work first attributed to an composer and then to another : http://catalogue.bnf.fr/ark:/12148/cb13963970r **Mozart, Wolfgang Amadeus (1756-1791)** **[Wiegenlied. KV 350]** *allemand* Berceuse sur un texte de Friedriech Wilhelm Gotter, faussement attribuée à Wolfgang Amadeus Mozart. - Dates de composition : 1795?-1796? **Voir : Flies, Bernhard (1770 ?-18..). – [Wiegenlied]** - for a work began by a composer and finished by another : http://catalogue.bnf.fr/ark:/12148/cb147249881 Varèse, Edgard (1883-1965)

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[Tuning up] anglais
Oeuvre laissée par Varèse à l'état d'esquisse (1947), reconstruite et complétée par Chou Wen-chung (1998)
Forme(s) associée(s) :
>> << Achevé par **:** Chou, Wen-chung (1923-....)

6.27.1.8
Works of uncertain or unknown origin

157

Example :
"Unknown Memphis family photo collection
(*Unpublished collection in the Mississippi Valley Collection of the University of Memphis. Title devised by cataloging agency*)"

Our comment :
An explanation is needed in this case. In our opinion the preferred access point would be the one constructed for the manifestation; which corresponds to the Title and responsibility statement.
Is it necessary to make an authority access point in this case?

6.27.3
Preferred access point representing an expression

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"a) a term indicating content type (see **6.9**)
b) the date of the expression (see **6.10**)
c) a term indicating the language of the expression (see **6.11**) and/or
d) a term indicating another distinguishing characteristic of the expression **6.13**"

Our comment :
The references are inadequate.

6.27.3
Preferred access point representing an expression

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"For Example:
Schoenberg, Arnold, 1874–1951. Moses und Aron. Libretto. Hebrew
Resource described: Mosheh ṿe-Aharon : operah be-shalosh
ma arakhot / Arnold Shenberg ; tirgem Yiśraśel Eliraz. the libretto to Schoenberg's opera Moses und Aron"

Our comment:
For processing of librettos, see our comments in *Memorandum* (5JSC/LC/12) § 6.2.3.3

6.28.3.7
Translations

201-202

"If the resource described contains expressions of the work in more than one language, create access points for each of the language expressions."

Comment already made in March 2008
(paragraph 6.13.0.6.1 in the previous draft)

Our comment :
According to this instruction, in the case of DVDs that contain several versions in diverse languages of the same work, as many expressions (and authority records) as versions will be created. It will increase a lot the cataloguing process of these resources.

JSC : Please see the revised instructions in the November 2008 draft.

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		Instructions seem not have changed on this point. If we must do descriptions of expressions for every dubbed film but also film with subtitles contained in a DVD, the cataloguer cannot create all these multiple access points. They must be managed by a computer system. It would be useful to insert in this paragraph an example of DVD containing a film with subtitles including all the necessary access points.
		« Record the name of the language applying the instructions given under **6.11** »
		Our comment : Correct the reference in 6.12.
6.29.1.5 Bills and drafts of legislation	216	"b) the preferred title for the legislative bill, formulated according to the instructions given **under 6.20.2**."
		Our comment : The reference is inadequate.
		Exemple : « United States. Congress (70th, 1st session : 1927–1928). Senate. Bill to designate a building site for the National Conservatory of Music of America, and for other purposes.
		Preferred access point for: A bill to designate a building site for the National Conservatory of Music of America, and for other purposes : 70th Congress, 1st session, S.2170 »
		Our comment : Is it the real title of the work or just the first words of the manifestation ?
6.29.1.6 Ancient Laws, Certain Medieval Laws, Customary Laws, etc.	217	"For the laws of ancient jurisdictions; laws of non-western jurisdictions before the adoption of legislative institutions based on western models; and customary laws, tribal laws, etc., use as the preferred access point (in this order of preference): a) the title by which the law or early compilation of laws is known (see 6.20.2.2.1.3) **b) the title proper of the resource containing the laws, etc.**"
		Our comment: The letter b is adequate for a specific text not for a compilation.
6.29.1.17	227	Examples Catholic Church. Treaties, etc. (*Preferred access point for:* Das Konkordat zwischen dem Heiligen Stuhle und dem Freistaate Baden)
		Catholic Church. Treaties, etc. (*Preferred access point for:* Základná zmluva medzi Svätou stolicou a Slovenskou republikou)

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		Our comment: A concordat is a very specific kind of agreement. So « Treaties » seems to us a too generic term to be used as preferred title for a concordat. Why not include « concordat » in the list of (collective) titles corresponding to the diverse forms of legal works? See also our comment under 620.4.2, §c *Comment already made in March 2008* *(paragraph 6.23.1.16.1 in the previous draft)*
6.29.1.23 Citations, digests, etc.	236	**Our comment**: Why create preferred access points controlled by authority records that repeat the title proper of the manifestation being described? They are not uniform titles that gather the different editions of the same work, and the resource can be searched by the title proper and the creator (corporate body or person). *Comment already made in March 2008* *(paragraph 6.23.1.22 in the previous draft)*
6.29.1.33 Additions to Access Points Representing Treaties, etc.	245	"If the access point for a single treaty is constructed using the preferred access point representing one of the parties, and if there is only one party on the other side, add (in this order): a) the name of the other party (see 6.18) b) the date, earlier date, or earliest date of signing (see 6.21.3)." **Our comment**: A variant access point should be made using the preferred access point for the other party as entry element. The date should be given in the standardized form in order to allow a real chronological filing and to be internationally understandable. *Comment already made in March 2008* *(paragraph 6.23.1.32.4 in the previous draft)*
6.29.1.33 Additions to access points representing treatises, etc.	245	"If the access point for a compilation of treaties, etc., is constructed using the collective name for the treaties, etc., (see **6.20.2.3.2**), and the compilation contains all the treaties, etc., add the year, earlier year, or earliest year of signing (see **6.21.3**). **For example :** Treaty of Utrecht (1713)" **Our Comment :** We don't agree : this form must be used for the specific treaty. Why add the year it is a compilation of treaties, and why the earlier or earliest year ? It would be more exact to give extreme dates.
6.30 Constructing access points	254- 280	**Our comment :** What about Biblical concordances? Is it only mentioned in subject

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to represent religious works and expressions		access points?
6.30.1.2 Works accepted as sacred scripture	254	"For a work that is accepted as sacred scripture by a religious group, construct the preferred access point representing the work using the preferred title for the work, formulated according to the instructions given under 6.29.3 »
		Our comment:
		Modify the title of the paragraph: Works accepted as sacred scripture and **founding texts**.
		See our comment in 6.23.2.5.
		Comment already made in March 2008 (paragraph 6.28.1.1 in the previous draft)
6.30.1.3 Harmonies of scriptural passages	256	**Our comment**: In the title and the text of the instructions, replace « passages » by « texts ».
		Comment already made in March 2008 (paragraph 6.28.1.2 in the previous draft)
6.30.1.4 General instructions on Theological creeds, confessions of faith, etc.	256	" For a theological creed, confession of faith, etc., construct the preferred access point representing the work using the preferred title for the work, formulated according to the instructions given under **6.29.3**"
		Our comment: The reference is false.
6.30.1.5 Liturgical works	257-259	**Proposal**
		We notice inconsistency in the way the rite of liturgical works is mentioned: Catholic Church. Missale Romanum (1970) = the rite is included in title of the work Catholic Church. Antiphonale pro diurnis horis (Benedictine) = the rite is a qualifier Catholic Church. Liturgy of Saint John Chrysostom = the rite is assumed to be known etc.
		We propose to harmonize the structure of the preferred access point (for all religions): 1. at the Work level Preferred title : preferred form of the title of the liturgical work 2. at the Expression level 2.1 Mention of the rite as a qualifier of the preferred title for the Expression. The mention of the rite must always be given

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Examples :
- o Roman rite, Ambrosian rite, Mozarabic rite, Benedictine rite, Hyde Abbey, Diocese of Braga
- o Byzantine rite, Coptic rite, Malabar rite
- o Ashkenaz rite, Conservative rite, Karaite rite, Sephardic rite

2.2 Mention of the intended users of the liturgical work as a qualifier of the preferred title for the Expression.
The experience has shown that it would be useful to differenciate between liturgical works for use by the celebrants and the liturgical works addressed to the faithful (for example, between Catholic Church: Missale Romanum, *"editio typica"* and a missal for lay use)

Examples of preferred title for liturgical works at the Expression level :

Liturgical book for use by the celebrants
[Lectionnaire de la messe (Rite romain) (français). Extrait. Ad experimentum]
Title proper: Lectionnaire ad experimentum pour la veillée pascale

Liturgical book for use by the faithful
[Missel (Rouen) (latin-français). Extrait. Fidèles]
Title proper: Petit eucologe complet en latin et en français,... publié avec autorisation de S. A. Em. Mgr le Cardinal Prince de Croy, archevêque de Rouen, à l'usage de son diocèse…

[Missel (Rite romain) (français). Adaptation. Enfants]
Title proper: Je vais à la messe : missel pour les enfants / éd. par Françoise Destang…

Paragraph	Page	Comment
6.30.1.5 General instructions on liturgical works	257-259	**Our comment**: Catholic Eastern rites are omitted. Instructions and examples would be necessary. Eastern rites are present only in **6.30.1.6 Liturgical works of the Orthodox Eastern Church.** What is the rule • when the origin of a Byzantine liturgical book is unknown? • when the name of a particular Church is inappropriate (for example, manuscripts or editions which are not published by a Church) ? The solution of creating 2 access points: Catholic Church. Liturgy of Saint John Chrysostom Orthodox Eastern Church. Liturgy of St. John Chrysostom is unsatisfactory. *Comment already made in March 2008 (paragraphs 6.28.1.4 and 6.28.5 in the previous draft)*
6.30.1.5 General instructions on liturgical works	257	"Apply the instruction given below to the following types of works" ... e) "prayer books known as « books of hours"."

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Our comment:
We disagree with including "prayer books" among liturgical works. Such "prayer books" are "intended for private devotions, not for liturgical use", and this point should be specified in the definition. Therefore these books are not liturgical works, and they should be dealt with in another paragraph.
They are not in *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*, 2nd ed., 1981

Comment already made in March 2008
(paragraph 6.28.1.4.1 e) in the previous draft)

Paragraph	Page	Comment
6.30.1.5 General instructions on liturgical works ****	257-259	"For a liturgical work falling into one or more of the categories listed above, construct the preferred access point representing the work by combining (in this order): a) the preferred access point representing the church or denominational body to which it pertains, formulated according to the instructions given under 11.12.1 b) the preferred title for the liturgical work, formulated according to the instructions given under 6.29.3"

Our comment:
Gather examples by religious body, and number them.
"Church or denominational body" as the first part of the constructed access point does not seem easy for Christian Churches except for Catholic Church. Under what corporate body liturgical works used by several Churches should be entered?

"Example 3
United Lutheran Church in America. Common service book of the Lutheran Church"

Our comment:
It does not seem necessary to repeat the name of the Church in the preferred title. Omit it in the preferred title allows to avoid useless redundancy.

For liturgical works of Catholic Church published subsequently to Council of Trent, the preferred title **must conform to the *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*, 2nd ed., 1981**

"Example 4
Catholic Church. Missal
Example 5
Catholic Church. Missale Romanum
Example 8
Catholic Church. Liber usualis"

Our comment:
Examples 4 & 5 are inconsistent regarding to the language and the

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form of the preferred title.

We propose to mention always the rite, as a **separate addition**, in the **language of the agency** creating the data: See in Appendix 2 below the French proposal for the mention of the rite.

Example 4 & 5
Catholic Church. Missale (Roman rite)
Example 8
Catholic Church. Liber usualis (Roman rite)

Example 6
Church of England. Calendar, lectionary, and collects

Our comment:
We disagree with this access point: if the manifestation contains 3 works, 3 access points (one by work) should be created.

Example 9 :
Catholic Church. Restored Holy Week liturgy

Our comment:
If it is a liturgical **text**, the preferred title must conform to the *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*; if it is only the musical work (as it seems from the comment), it must be constructed according to the instructions that applies to uniform musical titles.

Comment already made in March 2008
(paragraph 6.28.1.4.2 in the previous draft)

6.30.1.5
General instructions on liturgical works

259

"For a single passage from a sacred scripture used in religious services, construct the preferred access point representing the work applying the instructions given under 6.30.1.2."

Our comment:
The biblical "Book of Psalms" and the liturgical book "Psalter" (Psalterium) should be distinguished: The instructions for the Bible apply to the first one, and the preferred title for the second one must conform to the *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*.

Comment already made in March 2008
(paragraph 6.28.1.4.3 in the previous draft)

6.30.1.6
Liturgical works of the Orthodox Eastern Church

261

The preferred access point "Orthodox Eastern Church" does not correspond to an entity, it is a generic term to denominate all the Orthodox Churches (id est patriarchates of Constantinople, Alexandria, Antioch, Jerusalem together with their associated Churches)
Cf. 6.23.2.8

An autocephalous Orthodox Church generally is not creator of the liturgical books that it uses. Most of liturgical books used are

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common to different Churches.
Moreover some of these books are shared by the Byzantine rite of the Catholic Church, for example.

So for the same work, it is impossible to consider different corporate bodies as the entities creators. So we disagree with these preferred access points

6.30.2.2 — 263

Exemple :
Vedas. Atharvaveda.

Our comment:
Plural is inadequate.

See our comment under 6.23.2.14

6.30.3.2
Preferred access point representing an expression of a religious work — 268

"If the resource is a facsimile reproduction..."

Example :
Bible. German. Luther. 1534
Resource described: Biblia, das ist, Ddie gantze Heilige Sschrifft deudsch / Mart. Luth. ; begnadet mit kürfurstlicher zu sachsen Ffreiheit. — Kköln : Taschen, ©2002. Facsimile of a 1534 edition
Bible. German. Luther. 2002 »

Our comment:
Our analysis is that such information pertains to the manifestation level.
Otherwise why this instruction about the mention of date for facsimile is given here and not in the general instructions? Is it specific to the expressions of the Bible?

Add "facsimile" after the date of the original publication.
Example
Bible. German. Luther. 1534 facsimile
Bible. German. Luther. 2002

Comment already made in March 2008
(paragraphs 6.28.3.1.4 and 6.32.0.4.2 in the previous draft)

6.30.3.3
Preferred access point representing an expression of the Talmud, Mishnah and Tosefta, or Midrashim — 269

"Exception
If the resource consists of the original text and a translation, **do not add the name of the language**. Create a second access point using the name of the language of the translation as an addition."
Talmud
Talmud. English

Our comment :
Why this exception? The language of the expression must always be indicated: implied information should be avoided in an on-line catalogue, and in a multicultural context as the web context.
It would be better to have to access points as follows:

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Talmud. Hebrew
Talmud. English

Is this exception applicable only to Hebrew in the case of the sacred scriptures of Judaism? Or is it a general rule, applicable to the original language of the work for all kinds of works? In the last case, where is it formulated in chapter 6?

Comment already made in March 2008
(paragraph 6.28.3.2.2 in the previous draft)

6.30.3.4
Preferred Access Point Rrepresenting an Eexpression of the Vedas

269 « If the resource being described is a particular version of one of the four standard compilations of Vedas, add the name of the version in parentheses. »

For example :
Vedas. Sāmaveda (Kauthumasaṃ hitā) »

Our comment:
There is no consistency with the instructions given for the expressions of other sacred texts: for the Bible, versions are given after a full stop (in a specific subfield in MARC), but for "Vedas", versions are given in brackets after the name of the work (same subfield in MARC). Why such a difference?

« Vedas »: Plural is inadequate.

See our comment under 6.23.2.14.

6.30.3.5
Preferred access point representing a variant or special text of a liturgical work

270 "If the resource being catalogued contains an authorized or traditional variant or special text of a liturgical work, add to the preferred access point representing the work (in this order of preference):

a) the name of a special rite (e.g., a Latin rite other than the Roman rite for Catholic works; a rite other than the unmodified Ashkenazic rite for Jewish works)"

Our comment:
In order to have consistent access points, **the rite** should always be given as a **separate addition**, in the **language of the agency** creating the data. This rule should be a general rule that applies to all religions when it is pertinent.
This practice has the advantage to avoid any implicit element in a web context and to facilitate searching.
There is a need for an authoritative list for denomination of rites
Latin rites for Roman Catholic Church (See Appendix 2 below)
Eastern rites
Jewish rites

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b) the name of the place (e.g., country, diocese) or institution (e.g., monastery) in which the variant is authorized or traditional; if necessary, add both elements, with the institution preceding the place

Example
Catholic Church. Officia propria (Ireland)

Our comment:
The preferred title doesn't conform to the *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*, 2nd ed., 1981.
It should be : Proprium officii (Ireland)

Comment already made in March 2008
(paragraphs 6.28.3.4.1 and 6.28.3.4.1 b in the previous draft)

6.30.3.5
Preferred access point representing a variant or a special text of a liturgical work

****

272   "For post-Vatican II liturgical texts that vary in language and content, use the individual title of the resource being described as the preferred title, and add a term to distinguish between different texts that have the same title."

Our comment:
We totally disagree with this rule: the preferred titles for post-Vatican II liturgical texts must be conform to the *List of uniform titles for liturgical works of theLatin rites of the Catholic Church*, 2nd ed., 1981.
The unique option may be the language chosen : either latin (language of *editio typica*) or language of the agency creating the data.

Examples are inconsistent. The preferred titles in examples 3 & 4 should have the same structure as those in example 2 of this paragraph.

Example 3
"Order of Holy Cross" must be indicated as the mention of the particular rite (as Servite in example 2)
   Liturgy of Hours (Order of Holy Cross)

Example 4:
The preferred access point should be constructed as follows :
1) The preferred title must conform to the *List of uniform titles for liturgical works of the Latin rites of the Catholic Church*, 2nd ed., 1981, with the option of choosing the language of the agency.
2) "Order of the brothers of the blessed Virgin Mary of Mount Carmel" should be added as the mention of the particular rite
   Proper of the Office (Order of the brothers of the blessed Virgin Mary of Mount Carmel)

It is the only way to gather the same liturgical works and to arrange them according to the rite. In a web context the preferred title, with

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all its elements (additions), must be comprehensive without reference to the related corporate body

Comment already made in March 2008
(paragraph 6.28.3.4.3 in the previous draft)

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Chapter 7
Describing Content

Paragraph	Page	Comment
7.0 Describing content : purpose and scope	1	It is not necessary to give again in footnotes the definitions of « work » et « expression ». They are already in chapter 0 and in the glossary.
7.9.2 Academic degree	12	It would be useful to have an example and a rule on the language to use to record an academic degree. It should be in priority the language of the original thesis.
7.11.3.3 Recording date of capture	17	« 1997 April 22-23mois » Give rather the date under a standardized form : AAAAMMJJ
7.17.2.3 Recording colour of still images	29- 30	The examples must be placed after the rules they illustrate : • The first example illustrates the third paragraph after the exception, • The second example illustrates perhaps the fourth paragraph • The third example illustrates the first paragraph after the exception, • And the last example illustrates the second paragraph. References to 7.22.1.3 and 7.22.1.4 are false.
7.18 Sound content	33	This paragraph is far less complete than 7.17 Colour content.
7.22 Duration	38	The global duration pertains to the manifestation and should be included in extent in 3.4. The duration of every piece pertains to the expression.
7.23 Performer, narrator, and/or presenter ****	41	This part pertains to statements of responsability and should be removed to 2.4 Statement of responsibility.
7.24. Artistic and/or technical credits ****	42	« Artistic and/or technical credits are listings of persons, families, or corporate bodies (other than the cast) who have contributed to the artistic and/or technical production of a motion picture or video recording. » **Our comment :** A note is not sufficient to record a composer or a script writer. The authors of the original idea, of the scenario, of the dialogues, the composer and the director have all an equal responsability for an audiovisual work.

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Chapter 8
General Guidelines on Recording Attributes of Persons, Families, and Corporate Bodies

Paragraph	Page	Comment
General comment on Chapter 8		We insist on the importance to refer to international sources and IFLA's normative documents.
		We do not agree with JSC's answer about « IFLA Names of persons ». « Further references to Names of Persons may be considered in future when that standard has been updated. »
		The document, in its present form, is a reference for many countries, even if a new edition is in preparation.
		No reference is made to authority files of each country and to national usages.
		This chapter should contain only the information and instructions which are common to persons, families and corporate bodies and which cross refer to the dedicated chapters of each of these entities, as is the case in 8.5.
8.1.2 Person, family, and corporate body	2	The terms person, family, and corporate body are used as follows: "The term person refers to a human or non-human individual or to an identity established by an individual (either alone or in collaboration with one or more other individuals)." **Our comment:** We note that this definition differs from the definition of FRAD : "An individual or a persona established or adopted by an individual or group". Is there any particular reason ? It should be clarified criteria of identification and treatment when a person has several identities. The case of collective pseudonyms should be clarified too. *New version of a comment already made in March 2008 (paragraph 8.1.1 in the previous draft).*
8.2 Functional Objectives and Principles	3	Representation. The name or form of name designated as the preferred name for a person, family, or corporate body should be the name or form of name **most commonly found in resources associated with that person...**" **Our comment:** These guidelines are lacking of precision. Would it be possible to give an order of priority for the use of sources, especially for the authors of the Antiquity.

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Paragraph	Page	Comment
8.5.2 Capitalization	6	**Our comment :** Just follow national usages. *Comment already made in March 2008* *(paragraph 8.5.1.1 in the previous draft).*
8.5.6 Spacing of initials and acronyms	7	"When recording the name of a person or family: a) leave a space between a full stop following an initial representing a forename or surname and the subsequent initial or name b) if the name consists entirely or primarily of separate letters, leave a space between the letters (regardless of whether they are followed by full stops or not) c) if the name includes initials or abbreviations forming part of a title or term of address, leave a space between the initial or abbreviation and a subsequent initial, abbreviation, number, or word." **Our comment:** These guidelines are in contradiction with the 1.7.6 (Spacing of initials and acronyms) : «...transcribe the letters without spaces between them... » The examples in RDA of names of persons containing initials have not always spaces. For example : M.J. Farrell in chapter 9, p. 19 Unify the guidelines between the chapters and the presentation of the examples. Is it possible to give an example of name of person "consisting of entirely or primarily of separate letters". Is the instruction to leave constantly a space between the initials even when it doesn't happen to be one in the resource? Doesn't this fall in contradiction with the instruction according to which the form of the name found in the resource should be respected ? For persons the French standard prescribes : "an author's name is provided in the heading in the form that he or she has chosen or by which he or she is commonly known. Any peculiarities as to spelling (spaces, abbreviations, etc.) should be painstakingly recorded." (NF Z 44-061, § 1) *Comment already made in March 2008* *(paragraph 8.5.5.1 in the previous draft).*
8.5.6 Spacing of Initials and Acronyms	8	«b) if separate letters or initials appear on the source of information without full stops between them, record the letters without spaces between them. » **Our comment:** The French instruction is not to respect the typo of the publication (cf NF Z 44-060, note 7.) and to transcribe without developing,

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without full stops and without spaces. (§ 0.4.3, § 1.2.2.2).
This is in conformity with the revised text of IFLA's "Form and structure of corporate headings", published in International cataloguing & bibliographic control, October/December 1992.
Citation from that source:
"this text is to be added at the end of the chapter « general recommendations" as 7.6 alinea.
When choosing an abbreviated form […] transcribe the abbreviated form, without dots and without spaces, whatever the form of name used in the publication may be, be it an initialism or an acronym"

Comment already made in March 2008
(paragraph 8.5.5.2 in the previous draft).

8.5.7
Abbreviations — Page 9

Suppress the full stop in the example :
« Rosenblum, Mlle. »

8.12
Sources consulted
8.12.1.1
Scope — Page 13

"Sources consulted are publications or reference sources used in establishing the form of name or title on which the preferred access point or a variant access point is based."

Our comment:
Reference should also be made to the appropriate national authority file.

Comment already made in March 2008
(paragraph 8.12.0.1.1 in the previous draft).

8.13.1.1
Cataloguer's note — Page 13

"A cataloguer's note is an annotation that might be helpful to those using or revising the preferred access point, or creating a preferred access point for a related person, family, or corporate body"

Our comment :
This scope lacks precision. Different types of annotations are made reference to without any explicit differentiation as to their nature and purpose. The paragraph mixes up different kinds of annotations, some of them being helpful to the cataloguer for establishment of access point, others being useful to all the users since they serve to identify the entity and distinguish it from other entities.

Although this "mixture" is also foreseen by GARR, the definition given in GARR § 1.5.1.1 (see below) appears however more precise than that of RDA.
GARR's definition :
"The cataloguer's note area may include notes on sources consulted in establishing the heading, references to specific rules applied, notes limiting the use of the heading and/or differentiating persons or bodies with similar names, notes justifying the choice of form of name, etc."
A distinction should equally be made between public notes and notes which should remain confidential for privacy reasons during the lifetime of the person, as is the case of notes about the usage of

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		pseudonyms when the person doesn't whish that the relationships between his/her identities be revealed. *Comment already made in March 2008* *(paragraph 8.13.0.1.1 in the previous draft).*
8.13.1.3 General guidelines	15	We suggest to change the order of the items of the list as follows: place c) and d) before a) and b): The list would read as follows if the suggested change is accepted: a) notes limiting the use of the access point b) notes differentiating persons, families, or corporate bodies with similar names. c) notes on the specific instructions applied in creating the preferred access point d) notes justifying the choice of preferred name, the form of the access point, etc. *Comment already made in March 2008* *(paragraph 8.13.0.1.1 in the previous draft).*

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Chapter 9
Identifying Persons

Paragraph	Page	Comment

General comment on Chapter 9

Constructing access points to represent persons
We have not found in RDA general principles on constructing an access point from a name for a person. Even if such principles are known by cataloguers, it seems important to give them in a cataloguing code.
These general principles are :
When the name of a person consists of more than one element, one of these elements is chosen as the entry element.
If the entry element is the first element of the name, the form of the name chosen as the basis for the access point is the same as the name.
If not, those elements that are before the element chosen as the entry element are given after the last element of the name. The form of the name chosen as the basis for the access point then has two parts : the entry element and the other part of the name.
Inside these two parts, the order of the elements constituting the name should be maintained.

Construction of access points is independent of the structure of the encoding format. For example, in UNIMARC/A format, each part of the name chosen as the basis for the access point has its own subfield (200 $a Entry element $b Part of name other than entry element) ; in MARC21 format, there is only one subfield for the two parts of the name chosen as the basis for the access point, with prescribed punctuation between them (100 $a Entry element, Part of name other than entry element).

Examples :

Name	Entry element	Part of name other than entry element
Martin Cruz Smith	Smith	Martin Cruz
Gilles Martin-Chauffier	Martin-Chauffier	Gilles
Mrs Humphry Ward	Ward	Mrs Humphry
Leonardo da Vinci	Leonardo da Vinci	

****

FRAD attributes qualifying the form of a name or of an access point are missing in RDA :
• Language of name : The language in which the name is expressed. Ex :
Thomas d'Aquin (saint ; 1225?-1274) forme courante français
Thomas Aquinas (saint ; 1225?-1274) forme internationale latin

• Script of name: The script in which the name is rendered.

• Transliteration scheme of name : the scheme used to produce the transliterated form of the name.

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		Such attributes are important to understand the different forms and to select one form as the preferred access point in a given catalogue.
		There is no mention of the possible (and desirable) combination of the attribute Date with other attributes such as Place of residence, Address, Affiliation or Profession.
		General comment already made in March 2008.
		The term "patronymic" has different meanings depending on the usages in constructing the names in different times or cultures (names of the European Middle Age, Russian names, Scandinavian names before the XXe century, etc.). The exact meaning of the term should be explained in each case : surname transmitted by the father or name (or part of the name) constructed from the father's name
		General comment already made in March 2008.
9.0 Purpose and scope	1	References to paragraphs in the Appendix F are wrong. Numbers must go from F.2 to F.12 , not from F.1 to F.11.
9.2.1.1 Scope	2	« by which a person isknown » **Our comment:** Add a space between « is » and « known ».
9.2.2 Preferred name for the person 9.2.2.2 Sources of information	3	"Determine the preferred name…from the following sources (in order of preference)… c) other sources (including reference sources)" **Our comment :** Add : "giving priority to the national authority file responsible for this person at an international level" e.g. the German authority file for a German author, the French authority file for a French author, etc. *Comment already made in March 2008* *(paragraph 9.0.2.1 in the previous draft).*
9.2.2.4 Recording the preferred name	5	"If the name consists of several parts, record as the first element that part of the name under which the person would normally be listed in authoritative alphabetic lists in his or her language or country of residence or activity, followed by other parts of the name." **Our comment :** We propose to add : use as authoritative list the authority file of the country of the person as available. Otherwise, choose the first element according to national use, such as described in "Names of persons, 1996" Erase the word "alphabetic" to make it applicable to all sorts of

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Paragraph	Page	Comment
		scripts.
9.2.2.5.1 Different forms of the same name. Fullness	6	"If the forms of a person's name vary in fullness, choose the form most commonly found as the preferred name." **Our comment :** The criterion « most commonly found » doesn't apply to classical authors frequently and universally cited. Example : J. Barbey d'Aurevilly (Most common form: J. Barbey d'Aurevilly) (Occasional forms: Jules Barbey d'Aurevilly; Jules-Amédée Barbey d'Aurevilly) (Rare form: J.-A. Barbey d'Aurevilly)» **Our comment :** We refuse this example. The abbreviated form of the given name is not commonly used for French authors and is not used in the preferred access point. For a French author, the preferred form should be the form chosen as the preferred access point in the BnF authority record. Barbey d'Aurevilly, Jules (1808-1889) < Barbey d'Aurevilly, Jules Amédée (1808-1889) < Aurevilly, Jules Amédée Barbey d' (1808-1889) < Aurevilly, Jules Barbey d' (1808-1889) < Aurevilly, Barbey d' (1808-1889) < Barbey, Jules (1808-1889 < Syrène, Maximilienne de (1808-1889) http://catalogue.bnf.fr/ark:/12148/cb118901433 Note that in this example the abbreviated form of the given name is not used even as a variant access point. *Comment already made in March 2008* *(paragraph 9.2.1.1.1 in the previous draft).*
9.2.2.5.2 Language	9	Established form in the language preferred by the agency creating the data **Our comment :** In order to be consistent with the general instruction given under « language preferred by the national agency creating the data », the examples should not give only the English form as the preferred form, but the form in diverse languages with a comment: Saint Francis of Assisi (when English is the language preferred by the national agency) Saint François d'Assise (when French is the language preferred by the national agency) San Francisco de Asís (when Spanish is the language preferred by the national agency)

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		Pope Benedict XVI (when English is the language preferred by the national agency) Pape Benoît XVI (when French is the language preferred by the national agency) Papa Benedicto XVI (when Spanish is the language preferred by the national agency) *Comment already made in March 2008 (paragraph 9.2.1.2b in the previous draft).*
9.2.2.5.3 Names written in a non-preferred script	10	Add examples using other transliteration standards, particularly ISO international standards. For an international perspective, ISO transliteration standards, when they exist, should be preferred to national tables. Furthermore, for some scripts, ISO transliteration standards ensure the reversibility of the transliteration and the possibility of automatic data processing, that is rarely the case with other transliteration systems. The examples given here are in contradiction with the note 4 on p. 10 and the paragraph b) on page 12. *New version of comment already made in March 2008 (paragraph 9.2.1.3a.2 in the previous draft).*
9.2.2.5.3 Names written in a non-preferred script	10	Same comment as under 9.2.5.2: examples should present diverse preferred forms according to the preferred language of the national agency creating the data. Not only: Homer (Name appears in original script as: Ὅμηρος) but also: Homer (when English is the language preferred by the national agency) Homère (when French is the language preferred by the national agency) Homero (when Spanish is the language preferred by the national agency) *Comment already made in March 2008 (paragraph 9.2.1.3a.1 in the previous draft).*
9.2.2.5.3 Names written in a non-preferred script	12	Exemple : « A.N. Scriabin Name appears in original script as: A.H. Skri͡abin » **Our comment:** The original form of the name should be given in the Cyrillic script : Скрябин, Александр Николаевич (1872-1915)

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		http://catalogue.bnf.fr/ark:/12148/cb13899609r/ The same example must be corrected on page 15.
9.2.2.5.3 Names written in a non-preferred script	14	"Note 6: Alternative instruction… b) Surname recorded as the first element …Choose the form of name that has become well-established in reference sources in the language preferred by the agency creating the data for a person whose surname is recorded as the first element in the name (see 9.2.5–9.2.9) and whose name is in a language written in a script that differs from the preferred script of the agency creating the data. **For a person who uses Hebrew or Yiddish** and whose name is not found to be well-established in those sources, choose the transliterated form appearing in resources associated with the person" **Our comment :** Why a particular rule for these two languages? *Comment already made in March 2008* *(paragraph 9.2.1.3b in the previous draft).*
9.2.2.5.4 Spelling	15	"If variant spellings of a person's name are found, and these variations are not the result of different transliterations, choose the form found in the **first resource received."** **Our comment :** A distinction must be made between the ancient authors and the contemporary authors. For ancient authors, according to the international rules, if there is no modern form of the name, the preferred name is in the spelling most frequently found in the resources. *New version of comment already made in March 2008* *(paragraph 9.2.1.4.1 in the previous draft).*
9.2.2.7 Change of name	17	The type changes in the example : Ford Madox Ford not Ford Madox Hueffer
9.2.2.9 General guidelines on recording names containing a surname	23	« Record the surname as the first element. If the surname is not the first part of the name, follow it by a comma and transpose the parts of the name that precede it. If the first part of the name is the surname, follow it by a comma… » **Our comment :** For an international perspective (and also with the objective to define data elements pertaining to access points), it would be better to adopt a less formal approach and to avoid prescribed punctuation (it can be a layout option). Why not distinguish "entry element" and "inverted element" (or part of name other than entry element)?

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		It would be useful to have some comments accompanying the examples.
		Comment already made in March 2008 (paragraph 9.2.5.1.3 in the previous draft).
9.2.2.9 General guidelines on recording names containing a surname	24-25	"Omit terms of address from any name that includes a surname unless: a) the name consists only of a surname (see 9.2.2.9.3) or b) the name is of a married woman identified only by her husband's name and a term of address (see 9.2.2.9.4). Read, Miss Strong, Harold, Mrs.
		Our comment : The example « Read, Miss » should appear on page 24, after the paragraph a) to which it applies.
****		When a married woman is identified only by her husband's name and a term of address, the term of address must be considered as part of the name : Strong, Mrs Harold not Strong, Harold, Mrs.
		Besides, some given name can be used equally for men and women (e.g. "Dominique" in French names, "Robin" or "Leslie" for English names), and the construction such as « Strong, Harold, Mrs. » doesn't allow the ambiguity to be resolved.
		New version of comment already made in March 2008 (paragraph 9.2.5.1.4 in the previous draft).
9.2.2.9.2 Part of the name treated as a surname	26	See appendix F for additional instructions on names in the Arabic alphabet (**F.1**) and certain Indonesian (**F.6**) and Malay names (**F.7**).
		Our comment: Change to **F2, F7 et F8.**
9.2.2.9.5 Words, etc., indicating relationship following surnames	27	Why distinguish Portuguese names from other names? The general rule is to maintain such terms in the preferred form of the name when it is the usage of the language. Otherwise, such indication should be recorded in a note, as part of the FRAD attribute "Other designation associated with the person". We think that this paragraph should be deleted and superseded by a reference to "Names of persons".
		Comment already made in March 2008 (paragraph 9.2.5.6 in the previous draft).

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9.2.2.9.5 Words, etc. Indicating relationship following surnames

**

« Dumas, Alexandre, père »

Our comment:
This example is false. Such a form with the term indicating a relationship (filiation) can occur for Alexandre Dumas fils who used this form on his publications, but not for his father who never used « Alexandre Dumas père » on his publications.
It seems more correct, objective and precise to follow the general rule for homonyms and to give the biographical dates of the person in order to precise the name and identify the person. Follwing the general rule allows also the names to be filed in the correct chronological order in the indexes.
The preferred form in the BnF's authority file is :
Dumas, Alexandre (1802-1870)

Besides, in the FRAD model, such an addition to the name is considered as « a designation other than a name or title by which a person is known or identified » (see FRAD §4.1, Attributes of a person, p. 16). It is NOT an integral part of the name.

9.2.2.10 Compound surnames

28

« Record a name containing a surname … given under 9.2.1.9 »

Our comment :
9.2.1.9 does not exist;

9.2.2.10 Compound surnames 9.2.2.10.1 Established usage

29

Example :
Fénelon, François de Salignac de La Mothe-

Our comment :
« Fénelon » (without any other element of the name) is in fact the form of the name « by which the person is commonly known ».
If the complete name is used, the entry element must be « Salignac de La Mothe Fénelon » according to the French rules.
In the example in RDA, the hyphen after « La Mothe » must be deleted as it is not attested.

In the BnF authority record, this form of the name is recorded as a variant form; the preferred form of the name in the BnF authority record is:
Fénelon (1651-1715)
< Fénelon, François de Salignac de La Mothe (1651-1715)
< Salignac de La Mothe Fénelon, François de (1651-1715)
< La Mothe Fénelon, François de Salignac de (1651-1715)
http://catalogue.bnf.fr/ark:/12148/cb11886277x

Comment already made in March 2008
(paragraph 9.2.6.2.1 in the previous draft).

9.2.2.11.1 Articles and prepositions

31

« See appendix F :
Afrikaans (see F.11.1),
etc.

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Our comment:
The reference should be to F12.

| 9.2.2.11.2
Other prefixes | 32 | Example
Āl Yāsīn, Muḥammad Ḥasan |

Our comment :
In this example, the name should begin with a lower-case letter, according to the instructions in A.2.2

*Comment already made in March 2008
(paragraph 9.2.7.3.1 in the previous draft).*

| 9.2.2.13

** | 33 | « Paris, Henri » |

Our comment:
We cannot accept this form, because « Paris » is neither a surname neither a name of house (or family) but the name of a place associated with a title of nobility.
According to the French rules for the names of members of royal houses that are no longer reigning, it is the name of the House or Dynasty that is recorded as the entry element (AFNOR Z 44-061 § 2.2.1)
Therefore, the correct form should be :
Orléans, Henri d'

We can accept :
« Paris, Comte de »
because this form of the name is commonly used in the publications and is the name « by which the person is the most commonly known. In the BnF's authority record, it is recorded as a variant access point.

*New version of comment already made in March 2008
(paragraph 9.2.9 in the previous draft).*

| 9.2.2.14 | 34-
35 | "Do not include the term Saint as part of the name of a canonized person known by a title of nobility. Record the term as a designation associated with the person (see 9.6.0.4 RDA 9.6.1.4)." |

Our comment :
9.6.0.4 does not exist

An example would be useful.

*Comment already made in March 2008
(paragraph 9.2.10.1.4 in the previous draft).*

| 9.2.2.15
Titles in the United
Kingdom Peerage That | 34-
35 | Why two sub-chapters only for the peculiar case of title of nobility of the United Kingdom? It is disproportionate in an international perspective. |

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Paragraph	**Page**	**Comment**
Include a Territorial designation		A reference should be made to "Names of persons".
		Comment already made in March 2008
9.2.2.16 Judges of the Scottish Court of Session bearing a Law Title beginning with Lord		*(paragraphs 9.2.11 and 9.2.12 in the previous draft).*
9.2.2.18 General guidelines on recording names containing neither a surname nor a title of nobility	37	« Include as part of the name any words or phrases denoting place of origin, domicile, occupation, or other characteristics that are commonly associated with the name in resources associated with the person or in reference sources. Precede such words or phrases by a comma."
		Our comment : Such words or phrase are an integral part of the name: consequently, there is no need to introduce a comma when the name is recorded in direct order. The comma can introduce some confusion with other elements of the names of persons that are postponed after the entry element (given name, title of nobility, etc.) in the inverted part of the Name
		"Example « Helena, Maria » (Listed in reference sources under Helena) »
		Our comment : A comment to this example would be useful. "Maria" seems to be a given name recorded in the inverted part of the name. If it is, this example has no place here. If it is not, an explanation is needed.
		Comment already made in March 2008 (paragraph 9.2.14.1.3 in the previous draft).
9.2.2.18 General guidelines on recording names containin neither a surname nor a title of nobility	38	Exemple "Jeanne, de Flandre"
		Our comment: Please omit the comma.
9.2.2.19 Names including a patronymic	39	See our general comment at the head of this chapter on the definition of the term "patronymic".
		« Record the first given name as the first element, followed by the rest of the name in direct order. If the patronymic precedes the first given name, transpose the parts of the name to bring the first given name into first position".
		Our comment : It seems that there is no example illustrating the second part of the instruction.

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Paragraph	Page	Comment
		Different categories of names are mixed in the examples, without any precision, to the prejudice of clarity. There are Ethiopic names as Kidana Maryam Gétahun (Given names: Kidana Maryam) (Patronymic: Gétahun) and names of the Middle Age « Moses ben Jacob, of Coucy (Given name: Moses) (Patronymic: ben Jacob) (Words denoting place: of Coucy) »
9.2.2.20 Names of royal persons	40	Replace « royal persons » by « sovereigns », as sovereigns are not always at a royal rank. For example, Grand-Duc in Luxembourg.
9.2.2.2.1 General guidelines on recording names consisting of initials, or separate letters or numerals ****	41	"Include any typographic devices when they appear as part of multi-letter abbreviations of a name, but omit them when they follow single-letter initials". **Our comment :** We totally disagree with this practice. The number of stars or dots for example can be a differentiating element to distinguish between two authors. Here are examples from the BnF authority file: C *** (17..-18..? ; avocat) http://catalogue.bnf.fr/ark:/12148/cb12555860m C ***** (17..-18.. ; romancier) http://catalogue.bnf.fr/ark:/12148/cb15071877b *Comment already made in March 2008 (paragraph 9.2.17.1.2 in the previous draft).*
9. 2. 2. 24 Phrase containing the name of another person	44	Example « Veuve de Balthazar Arnoullet »: **Our comment:** This example is not correct. The entry element should be Arnoullet and the name should be recorded as « Arnoullet, Veuve de Balthazar » http://catalogue.bnf.fr/ark:/12148/cb12230228b/ This case is similar to the case of a married woman identified only by her husband's name (§ 9.2.2.9.4)
9. 2. 2. 25 et 9. 2. 2. 26 Characterizing word or phrase :	44-45	We disagree with this rule because the omission of the initial article can create some confusion. « Physician, A" is not the same thing than " Physician, The". The initial article can allow two identical phrases to be distinguished.
9.2.3.3 General guidelines on recording variant names for persons	46	The beginning of the sentence of the second paragraph is missing : "ecorded as the preferred names"

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Paragraph	Page	Comment
9.2.3.4 Real name	47	"…record the individual's real name, if known, as a variant name" :
		Our comment: It is possible only if the real name is of public notoriety. Otherwise, it should be recorded as a confidential note.
9.2.3.4 Real name	47	Example Dudevant, Amandine-Aurore-Lucile (Pseudonym recorded as preferred name: Sand, George) **Our comment :** This example is incorrect, as the variant form is not complete and combines two distinct attested forms of the given names: In the BnF authority record there are two variant names: < Dudevant, Amandine Aurore Lucie Dupin (1804-1876 ; baronne) nom d'alliance < Dudevant, Amantine Aurore Lucile Dupin (1804-1876 ; baronne) nom d'alliance with an explanatory note: Certificate of birth : Dupin, Amantine, Aurore, Lucile [baptized Amandine, Aurore, Lucie] spouse of baron Dudevant, François-Casimir http://catalogue.bnf.fr/ark:/12148/cb119236010 *Comment already made in March 2008* *(paragraph 9.3.1.3 in the previous draft).*
9.2.3.6 Name in religion	48	Add a comment to the example « Louis » to explain that the complete access point will be « Louis (trappiste ; 1915-1968) ». The name « Louis » alone have a lot of homonyms.
9.2.3.9 Alternative linguistic form of name	51	Please omit the comma in the example "Jeanne, d'Arc".
9.2.3.9 Alternative linguistic form of name	52	Please modify the example "Benedictu**m** XVI" in "Benedictu**s** XVI"
9. 2. 3. 10 Other variant name	54	Exemple "Bathildis " Name as sovereign recorded as preferred name : Bathildis, Queen consort of Clovis II, King of" : **Our comment:** This example is not correct, because 1. « queen consort » is a concept that does not exist in the French monarchy and 2. the name as Saint is preferred according to the French rules Bathilde (sainte ; 0634-0680) Please correct the example "Soubirous, Marie-Bernarde" The preferred form of her name as saint is not "Bernadette", mais

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« Bernadette Soubirous» in the direct order.
So the preferred access point should be "Bernadette Soubirous (sainte ; 1844-1879)".

9. 2. 3. 10 Other variant name — 57 — Exemple "Fontaine, Jean de la" :

Our comment:
The initial letter of the article « La » should be an upper case letter.
"Fontaine, Jean de La" :

9.3.2.3
Recording the date of birth — 63 — If the person was born in the same year as another person with the same name, record the date of birth in the form [year] [month] [day]. Record the month in the language and script preferred by the agency creating the data.

Our comment :
Dates should be recorded under a standardized form, with numbers in the following order Year-Month-Day (YYYY-MM-DD). It is the only way to make the dates understandable internationally.
As they are expressed in a specific language, words should also be avoided in recording dates and international abbreviations are to be preferred :
 for example,
"ca 1003" should be preferred to "approximately 1003"
"-361" to "361 B.

It would be good to have the possibility to record a period or a century when the precise dates of life cannot be established, as is possible for the dates of activity.

Comment already made in March 2008
(paragraph 9.4 in the previous draft).

9.4.1.4.2
Person with the highest royal status within a state, etc. — 68 — We suggest using the term "sovereign" instead of the phrase "person with highest royal status".

Comment already made in March 2008
(paragraph 9.5.0.4a in the previous draft).

9.4.1.4.2
Consorts of royal persons — 69 — "For a consort of a person with the highest royal status within a state or people, record his or her title followed by consort of [the preferred name for the royal person and his or her title as prescribed in 9.5.0.4a]. Record the title of the consort in the language preferred by the agency creating the data if there is a satisfactory equivalent in that language."

Our comment :
This rule cannot be generalized : how to deal with consorts depends on national usages:
• the title may contain the term "consort", as in the United Kingdom
Example :
Albert (prince consort de Grande-Bretagne ; 1819-1861)

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but
• the title may not contain the term "consort", as in France : it is only a biographical information and, as such, it has to be recorded among the biographical notes and not in the preferred access point.
It is necessary to refer to national usages and to "Names of persons".

Example :
Queen, consort of Louis XIII, King of France.

Our comment :
This example is not correct with regard to the French usage : the royal title was conferred de jure to the wife of the king by the Salic law; therefore the consorts of the kings of France had the title of Queen of France.
In the BnF authority record the preferred access point is:
Anne d'Autriche (Reine de France ; 1601-1666)
with a biographical note:
Fille de Philippe II, roi d'Espagne. Épouse de Louis XIII, roi de France
http://catalogue.bnf.fr/ark:/12148/cb119384982

Comment already made in March 2008
(paragraph 9.5.0.4b.1 in the previous draft).

9.4.1.4.3
Children and grand children of royal persons

Page: 69-70

For a child or grandchild of a person with the highest royal status within a state or people, record the title borne by him or her.

Our comment :
Such data are biographical information and must not be recorded in the access points.

Comment already made in March 2008
(paragraph 9.5.0.4c in the previous draft).

9.4.1.4.3
Children and grand children of royal persons

If such a child or grandchild is known only as Prince or Princess or a similar title without a territorial designation, record that title followed by:
a) another title associated with the name
or b) daughter of . . ., son of . . ., granddaughter of . . .,
or grandson of . . . "

Our comment :
See comment under 9.4.1.4.2 : according to national usages, the term may be a part of the title, but if it is neither a name nor a title but biographical information, it should be recorded among the biographical notes and not in the preferred access point.

Comment already made in March 2008
(paragraph 9.5.0.4c.2 in the previous draft).

9.5.1.3
Recording fuller forms of names

Page: 74

It is necessary to make sure that the abbreviated forms are really the common usage in the country of the person and that the fuller form should not be recorded as the preferred name.

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Paragraph	Page	Comment
		In the absence of any comment, examples listed p. 75-76 cannot be checked. For instance, the following example is correct only in the case of a South-American author, it is false in the case of a Spanish author. Rodríguez Larralde (Preferred name recorded as: Rodríguez L., Oswaldo) *Comment already made in March 2008 (paragraph 9.6.0.3 in the previous draft).*
9.6 Other designations associated with the person	77	This information corresponds (partially) to a FRAD attribute : FRAD §4.1, Attributes of a person, p.16 A designation other than a name or title by which a person is known or identified. Includes designations such as "Saint", "Spirit", etc. Includes designations such as "Jr.", "III", etc. when associated with a person whose name includes a surname. (See also "number" under section 4.12 - Attributes of a name.) Includes phrases associating the person with a particular work (e.g., "Author of Early Impressions"). Includes phrases associating the person with another person (e.g., "Follower of Rembrandt") BUT This paragraph deals only with "Saint" and "Spirit". It is only one aspect of the FRAD definition, even if some other aspects are treated elsewhere in RDA. Add to the list the terms indicating a familial relationship (père, fils, or designations such as "Jr.", "III", etc.) which are also included in the same attribute according to FRAD. *Comment already made in March 2008 (paragraph 9.6.0.3 in the previous draft).*
9.10 Country associated with the person 9.10.1.1 Scope	80	«A *country associated with the person* is a country with which the person is identified. » This definition is very vague. Is it the country of which the person has the nationality and which allows thr identification of the person, OR is it the country with which the person identifies him/herself and which can be different from his/her nationality ? It can also be an imaginary country. This attribute should have sub-categories in order to qualify or precise the relationship between the person and the country.
9.11 Place residence 9.12 Address of the person	81 82- 83	In Europe, such information is private and must remain confidential. Add an example of a printer of the hand press period in order to show the context in which this attribute is usually used, because it is necessary for identification and it does not affect the privacy.

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Paragraph	Page	Comment
		Example :
		Dupont, E.-I. (17..-18..? ; imprimeur)
		Adresse : Paris : 1793-1799?. - Rue (et maison) de l'Oratoire (- Honoré, n° 136)
9.13.1.3 Recording affiliation	84	This information must always be dated. The name of the corporate body is given as textual information only if the affiliation is mentioned in a note. If the affiliation is recorded as a link towards the corporate body, the form used should be the preferred access point and/or the identifier for that corporate body.
		Comment already made in March 2008 (paragraph 9.14 in the previous draft).
9.18.1 Basic instructions on recording identifiers for persons	92	Identifier for an entity is different of the identifier for the record describing this entity
		Please give a mention that an ISNI (International standardised Name Identifier) will exist soon.
9.19.1. Preferred access point representing a person	95	Example : "More, Thomas, Saint"
		Our comment : According to French rules, the names of Saints are always entered under direct order. The name under which the person was known before being canonized is considered as a variant form. Ex : Thomas More (Saint ; 1478-1535) < More, Thomas (1478-1535)
		Comment already made in March 2008 (paragraph 9.1.1.1.2 in the previous draft).
9.19.1.2 Title or other designation associated with the person	97	"Add to the name one or more of the following elements (in this order), as applicable… "a) a title of royalty (see 9.4.1.4) or nobility (see 9.4.1.5)" :
		Our comment : Titles of royalty should be separated from titles of nobility, as they differ in nature. A title of nobility is not mandatory when the person is not well-known under this title. It can be added to the name in order to distinguish between homonyms.
		Comment already made in March 2008 (paragraph 9.1.1.1.2 in the previous draft).
9.19.1.2 Title or other designation associated with the person	97	For example: Arundel, Philip Howard, Earl of, Saint
		Our comment :

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Paragraph	Page	Comment
		Known under the name "Philip Howard, Earl of Arundel", then under the name "Saint Philip Howard" after being canonized in 1970 (source : Oxford Dictionary of national biography). It is the case of two successive names for the same person. It is not right to combine them in one form. Two distinct forms are needed: Arundel, Philip Howard (1557-1595 ; comte d') Philip Howard (Saint ; 1557-1595) NB According to French rules, the names of Saints are always entered under direct order. *Comment already made in March 2008 (paragraph 9.1.1.2.1 in the previous draft).*
9.19.1.2 Title or other designation associated with the person	97	"Add to the name one or more of the following elements (in this order), as applicable… "d) the term Spirit " **Our comment :** There is also the case of names that do not correspond to physical persons: for example virtual singers. Add "Virtual person" to the list of qualifiers. Examples from BnF authority file : King Cool (personne virtuelle) Personnage de synthèse créé vers 1994. - Chanteur virtuel qui reprend les grands standards de la musique soul et funk version reggae http://catalogue.bnf.fr/ark:/12148/cb13967798j Bébé Lilly (personne virtuelle) http://catalogue.bnf.fr/ark:/12148/cb150691712 *Comment already made in March 2008 (paragraph 9.1.1.2.1 in the previous draft).*
9.19.2.1 General guidelines on constructing variant access points to represent persons	105	« Oyster (Poet) Form recorded as preferred access point: Boyes, W. W. (William Watson), 1835–1915 » **Our comment:** Explain why Oyster (Poet) is considered as a variant form and not as another identity, as this author has published under two names, his real name and a pseudonym. This example is in contradiction with the paragraph 9.2.2 « If an individual has more than one identity, a preferred name is chosen for each identity » and with the paragraph 9.2.2.8 : « If an individual has more than one identity, choose the name associated with each identity as the preferred name for that identity.»

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Chapter 10
Identifying Families

Paragraph	Page	Comment
10.2.1.3 General guidelines on recording names of families	2	National usages should be followed. The examples given p. 3 are non significant if the nationality of the family is not indicated in a comment. *Comment already made in March 2008 (paragraph 10.2.0.3 in the previous draft).*
10.2.2.4 Recording the preferred name	4	National usages should be followed. *Comment already made in March 2008 (paragraph 10.2.0.3 in the previous draft).*
10.2.2.7 Change of name	5	The instructions are not clear enough..
10.2.3.4 Alternative linguistic form of name	7	Example : « Accorsi » **Our comment:** The correct form is « Accorso »
10.2.3.5 Hereditary title	8	« For Example: Chandos, Dukes of Ericeira, condes da » **Our comment:** This plural cannot be applied to the French nobility.
10.2.3.6 Other variant name	8-9	« For Example: St. Pierre Form recorded as preferred name: Saint Pierre » **Our comment:** The full stop after St. in the variant is only justified if it is a name of an english-speaking person. A comment on the nationality is therefore necessary to justify it. « Broglie Form recorded as preferred name: De Broglie » **Our comment:** Reverse variant and preferred form : For a French family, the name must be recorded at Broglie and not De Broglie. *New version of a comment already made in March 2008 (paragraph 10.3.2.3.1 in the previous draft)*

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10.4.1.3 Recording dates associated with the family	10	Our previous comment : Precise the kind of dates that can be associated with the family: date of the origin of the family, date of activity, other ? Dates are added in the access point only in the case of dynasties. In other case, date may be indicated in a note. JSC's answer : *JSC: Any significant dates associated with the family may be recorded.* **Our comment :** Would it be possible to be more precise ? *Comment already made in March 2008* *(paragraph 10.5 in the previous draft)*
10.9.1 Basic instructions on recording identifiers for families	16	Foresee to set up an ISNI (International standardised Name identifier)

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Chapter 11
Identifying Corporate Bodies

Paragraph	Page	Comment
11.2.2 Preferred name for the corporate body 11.2.2.1 Scope	3	"If a body changes its name, a preferred name is chosen for use with resources associated with the new name (see 11.2.2)." **Our comment** : Does this instruction mean that the cataloguer must make a new record every time the name changes ? The French standard NF Z 44-06O (§1.2.3) recommends to choose the latest name or as attested name "provided that the change of name does not reflect "a fundamental change". In practice, we make a new record for example when a body merges with another or when an official organism became a private society. When the institution changes simply of name but nor status or objectives, we choose the new name as the preferred name and record the earlier name as variant name. We would prefer maintain this use because creating systematically a new record may increase the task of cataloguing. Is it possible to define in this part what is a Minor or Major change, as for the key titles of serials and continuing resources, and decide to keep the same record for a minor change of name ? *Comment already made in March 2008 (paragraph 11.2.2.1 in the previous draft).*
11.2.2.5 Different forms of the same name	5	« If there is no most commonly found form, choose a brief form (including an initialism or an acronym) that would differentiate the body from others with the same or similar brief names as the preferred name. For Example: AFL-CIO not American Federation of Labor and Congress of Industrial Organizations **Our comment:** We disagree with this guideline : It is contrary to the guidelines of the FSCH §4.2 and the French standard NF Z 44-060 §1.2.2.2, that favours the expanded form of the name, unless the initialism or the acronym are the most used. To make access points more meaningful for users, we think that it would be preferable to maintain this rule. *Comment already made in March 2008 (paragraph 11.2.1.1.4 in the previous draft).*
11.2.2.5.1 Variant Spellings	6	« If variant spellings of the name appear in resources associated with the body, choose the form found in the **first resource received**. » **Our comment:** It is in contradiction with the instruction to choose the latest name.

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*Comment already made in March 2008
(paragraph 11.2.1.2.1 in the previous draft).*

11.2.2.5.4
Conventional Name	11	« Autocephalous Patriarchates, Archdioceses, etc. Record the name of an ancient autocephalous patriarchate, archdiocese, etc., of the Eastern Church **using the name of the place** by which it is identified. Add, in parentheses, a word or phrase designating the type of ecclesiastical jurisdiction.
For Example:
Antioch (Orthodox patriarchate)
Constantinople (Ecumenical patriarcha »

Our comment:
We do not understand why the names of these bodies are recorded as additional elements of the name of the place, because such a construction put emphasis on the place and not on the corporate body itself.
They should follow the general rule for corporate bodies and be recorded under the direct form of name of the entity.
In the example:
Antioch (Orthodox patriarchate),
the official name of this entity is:
Greek Orthodox Patriarchate of Antioch and all the East
(source : WEB site), and this form should be retained as the prefered access point for the entity.

*New version of a comment already made in March 2008
(paragraph 11.2.1.5b in the previous draft).*

11.2.2.7
Names Consisting of or
Containing Initials	16-
17	« If the name of a corporate body consists of or contains initials, omit or include full stops and other marks of punctuation according to the most commonly found usage of the body. In case of doubt, omit the full stops, etc. »

Our comment:
We disagree with this different transcription (with or without full stops and spaces) according to the most commonly found usage of the body that is opposite to the FSCH and the French standard.

(See our comment on 8.5.6).

*Comment already made in March 2008
(paragraph 11.2.0.5.1 in the previous draft).*

11.2.2.14
Subordinate and Related
Bodies Recorded
Subordinately	27,
29	"TYPE 3 :
"Jean and Alexander Heard Library. Friends of the Library
(Name: Friends of the Library)"

and "TYPE 6"
Dunedin Botanic Garden. Friends

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Paragraph	Page	Comment
		Our comment: Such access points indicate that the Friends of an institution are subordinate to the institution they support. We disagree with such access points, because the Friends of an institution are usually associations which are not subordinate to the institution they support. If the name of the corporate body is significant, the form of the name which appears on the resources should be chosen as the preferred form of the name and recorded in a direct order : "Friends of the Jean and Alexander Heard Library". *New version of a comment already made in March 2008 (paragraph 11.2.3.2.5 in the previous draft).*
11.2.2.22.2 Legislative Committees and Subordinate Units	50-51	Exemples : « Australia. Parliament. House of Representatives. Standing Committee on Aboriginal and Torres Strait Islander Affairs Australia. Parliament. Senate. Legal and Constitutional References Committee » **Our comment:** Why the intervening unit is not omitted ? According to FSCH (§ 17) the intervening units are maintained only when they are necessary for identification. Our practice is to maintain them only in order to avoid homonyms.
11.2.2.25 Armed Forces	57	« If the component branch, etc., is identified by a number, follow the style of numbering found in the name (spelled out, roman numerals, or arabic numerals) and place the numbering after the name, preceded by a comma. For Example: United States. Army. Infantry Division, 27th United States. Navy. Fleet, 6th » **Our comment:** It would be preferable to harmonize the expression of numbers (roman numerals, arabic numerals, words), in the examples, to facilitate distinction between homonymous corporate bodies, indexing and searching. *Comment already made in March 2008 (paragraph 11.2.11.1.3 in the previous draft).*
11.2.3.6 Alternative linguistic form of name	77	Examples in Arabic and Hebrew scripts are written from the left to the right, instead of from the right to the left.
11.3 Place associated with the corporate body	87-94	We are in favour of an uniform manner to record the place associated with the corporate body : in the case of homonymy, the name of the country, state or province should be added systematically, without any abbreviation. No

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		exception would be made for any country.
11.11 Identifier for the corporate body	114	Please give a mention that an ISNI (International standardised Name Identifier) will exist soon.

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Chapter 16
Identifying Place

Paragraph	Page	Comment

General comments on Chapter 16
 	
****
		The exception to the general rule made in paragraphs 16.2.2.9 and 16.2.2.10 for four Anglo-Saxon countries (Australia , Canada, United States, Great Britain), Malaysia and two former states is NOT ACCEPTABLE.
		If the present rules are intended to be international, in a French catalog, only the name of the country (France) will be added to every French place, but only the name of the Malysian state to Malysian towns...
		For example :
		    Blois (France)
		
		Thus,
		either it is admitted that each country can adapt the rule to its own case and can add a more precise place to its national places, omitting the larger place at a national level
		For example :
		    Blois (Loir-et-Cher)
		
		or, there is a general rule without any exception : we suggest to practice double localization for all places (district and country) in order to equally treat the places at in international level and more accurately identify geographical entities:
		For example :
		    Northern Territory (Australia)
		    Darwin (Northern Territory, Australia)
		
		    Loir-et-Cher (France)
		    Blois (Loir-et-Cher, France)
		
		We are aware that if this practice is adopted at an international level, this will radically change the way of a recording places in national catalogues, as the present practice is different, BUT there is not other means to ensure compatibility at an international level.
		
		It would be necessary to introduce within the text the idea of Overseas Territory, assimilated to independent states.
		
		Non-significant elements as « arrondissement » must be recorded as subordinate.

16.2.2.9.1 States, etc.	8	Slovenia is not a proper example : it is an independant country since 1992
16.2.2.9.2 Other places	9	Kiev (Ukraine) Split (Croatia) are not proper examples even if their former belonging to USSR and Yugoslavia has no incidence on the preferred name.

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Use instead : Kosovo i Metohija (Serbia)
[Yugoslav preferred name which refers to Serbia, not to Yugoslavia.

| 16.2.2.13 | 11 | Example |
| Places within cities, etc. | | 11e Arrondissement (Paris, France) |

Our comment:
This example is different from the others of this paragraph. It does not look like an authority heading but a form in a bibliographic record transcribed as it appears in the item. The first element (11e) is not significative and other cities in France are divided in districts (as Lyon, or Marseille)

It would be preferable to record the name of the larger place first as in Corporates bodies Authority file of the BnF ou in indexing RAMEAU. This allows to classify in numerical order the Authorities headings in the catalog.

Corporates bodies BnF :
http://catalogue.bnf.fr/ark:/12148/cb131701939
Paris (Arrondissement ; 11)

RAMEAU :
http://catalogue.bnf.fr/ark:/12148/cb119572542
Paris (France) - - Arrondissement (11e)

Comment already made in March 2008
(paragraph 16.2.8.1 in the previous draft).

| 16.2.3.6 | 16 | Examples in Arabic and Hebrew scripts are written from the left to |
| Alternative linguistic form of name | | the right, instead of from the right to the left. |

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Chapter 17
General Guidelines on Recording Primary Relationships
between a Work, Expression, Manifestation, and Item

Paragraph	Page	Comment
General comment on Chapter 17		This chapter 17 is not clear as it does not really explain **how** the primary relationships should be described. It is never clearly stated in which context to use one or the other from the conventions listed in 17.4.2: the conventions described in 17.4.2.1 (Identifier of the Related Work, Expression, Manifestation, Item) and 17.4.2.2 (Preferred Access Point Representing the Related Work or Expression) appear to infer distinct records for each entity of Group 1 when the convention in 17.4.2.3 (Composite Description) corresponds to the "traditional" bibliographic record which gather the attributes of the different entities of Group 1 and mixes them inextricably in a single record. In this latter case the relationships are specific to the given type of information and they are implicit. We would like to find in an appendix complete examples showing the different ways to express entities from Group 1 and their relationships.
17.1.3 Access Point		The term **preferred access point** refers to the standardized access point representing an entity. The preferred access point representing a work or expression is constructed using the preferred title for the work preceded by the preferred access point representing a person, family, or corporate body responsible for the work, if appropriate. **Our comment:** Why " preceded by" ? This wording implies an ordered display. "Combined with" would be larger: it is this wording that has been chosen in "Statement of International Cataloguing Principles" of IME-ICC (§ 6.3.4.4).
17.4 Recording primary relationships 17.4.1 Scope		The relationship between a work and a manifestation that embodies that work may also be recorded without identifying the expression through which the work is realized (see 17.7-17.8) **Our comment:** How can anyone conceive the manifestation of a work without using an expression ? The two paragraphs to which the cross references are made are absolutely not explicit on their contents: RDA should be clearer and give explicitly the criteria that allow to dispense from identifying Expression. From the examples we can infer that it is done in the case of the first expression in the original language: it would be best to give this rule in an explicit manner.
17.4.2.1 Identifier for the Related Work, Expression, Manifestation, or Item	4	Example 3 : http://larvatusprodeo.net **URI for the blog** Larvatus prodeo

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Paragraph	Page	Comment
		Our comment: This URI is a simple URL, then it is not an identifier that warrants perennity.
17.4.2.3 Composite Description	5	Using a "composite description" to account for relationships maintains confusing data of different nature in a description. It is undoubtedly useful to secure the transition and take into account the records in the existing catalogues. But this technique should be strongly advised against in current cataloguing. Moreover, as this technique totally mixes the 4 entities of Group 1 in a **single** record (that is the "traditional" bibliographic record) its use in examples in 17.5 to 17.12 makes the relationships totally confusing, **particularly in 17.7 and 17.9** (one does not know anymore from what entity to what other entity the relationship is established).
17.5 Expression of Work	5-6	Examples are lacking and is also lacking particularly a sentence asserting the status of Expression for a sound recording (identified by an ISRC) and for a version of a movie (identified by a V-ISAN).
17.5.1.3 Recording an Expression of a Work	6	Exemple 2 : BA 4700 Music publisher number for an expression of Mozart's Eine kleine Nachtmusik **for string quartet** **Our comment:** How can a music publisher number that applies to a manifestation identify an expression ? Entities of Group 1 are confused.
17.6 Work Expressed	8	Example 3: Composite Description **Our comment:** As this example is presented it would rather be placed in 17.8. To have this example take its right meaning here, RDA should develop the comment in order to indicate that the information on expression (which is represented by the title proper) and the work (whicht is represented by the original title) are included in the description of the manifestation.
17.6.1.3 Recording the Work Expressed Preferred Access Point Representing the Work		**Exemple:** Mozart, Wolfgang Amadeus, 1756-1791. Kleine Nachtmusik **Our comment:** The complete title of the work is "**Eine** kleine Nachtmusik". The number in the thematical catalogue (KV 525) should be considered as an identifier of the work and appear in the access point.
17.7.1.3 Recording a Manifestation of a Work	9	1st FOR EXAMPLE, Example "Roadshow Entertainment: 1034539 **Publisher number for a DVD manifestation of the 2001 motion picture** Ocean's eleven"

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Our comment:
This example corresponds to the cinematographic work "Oceans'eleven" but only through an expression.
Or else, RDA should clearly assert the principle that allows to "skip" this stage in the case of an original edition of the work.
This should be explicitly stated, please !

17.9.1.3
Recording a Manifestation of an Expression

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1st FOR EXAMPLE,
Example "VCI Entertainment: 8202
Publisher number for a DVD manifestation of the motion picture Uccello dalle piume di cristallo, **dubbed into English from the original Italian"**

Our comment:
This example takes into account an expression of the work because it is a dubbing: then criteria do exist (that are implicit in the text of this draft) to define when to account for the expression and when to omit it.
Please, explicit them !

17.10.1.3
Recording an Expression Manifested

****

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1st FOR EXAMPLE, Example "BA 4700
Music publisher number for an expression of Mozart's Eine kleine Nachtmusik **for string quartet"**

Our comment:
How can a music publisher number that applies to a manifestation identify an expression ? Entities of Group 1 are confused.
In other respects this example accounts for the expression because the musical work is notated in transcription/arrangement.

2nd FOR EXAMPLE, Example "Dickens, Charles, 1812-1870. Bleak house. Spoken word
Preferred access point representing the expression, constructed by adding a term indicating the content type of the expression to the preferred access point representing the work"

Our comment:
In this example, one reads between the lines and guesses that there is an expression because the words written by Charles Dickens are read loudly and perceived via a sound recording.

2nd FOR EXAMPLE, Example "Blade runner (Motion picture : Final cut)"
Preferred access point representing the expression, constructed by adding a term indicating another distinguishing characteristic of the expression to the preferred access point representing the work"

Our comment:
This example is not explained very clearly. What is the work which is referred to if not this work in a reference expression (that is not identified)?

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Paragraph	Page	Comment
		2nd FOR EXAMPLE, Example "Bacewicz, Grażyna. Sonatas, violin, no. 2; arranged Preferred access point representing the musical expression, constructed by adding the term arranged to the preferred access point representing the original work"
		Our comment: This example too accounts for the expression because the musical work is notated in transcription/arrangement. **IT IS ESSENTIAL TO CLARIFY THE CASES WHEN THE EXPRESSION IS ACCOUNTED FOR AND WHEN IT IS POSSIBLE TO OMIT IT, AND TO GIVE CLEAR RULES CONCERNING THAT MATTER.**
17.11.1 Basic Instructions on Recording an Item of the Manifestation 17.11.1.2 Sources of Information	15	Take information on the relationship between a manifestation and an item of that expression from any source. Rectify "expression" in "manifestation"
17.11.1.3 Recording an Item of the Manifestation	15	The examples for the identifiers of items should be composed of the identifier of the institution followed by the identifier of the item inside the institution and not only composed of the latter one (cf. the instructions given in 2.19.1.4).

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Chapter 18
General Guidelines on Recording Relationships to Persons, Families, and Corporate Bodies
Associated with a Resource

Paragraph	Page	Comment
18.1.1 Explanation of Key Terms	1	There are a number of terms used in this chapter and in chapters **19–22** that carry meanings specific to their use in RDA. The meanings of a number of key terms are explained below under **18.1.3**–**18.1.6** .
		Our comment: Rectify the cross-reference in 18.1.2
18.1.2 Person, Family, and Corporate Body ****	2	The particular but very frequent case of collective pseudonyms has still not been dealt with. From the definition of "corporate body" is it to be inferred that corporate bodies include collective pseudonyms, and if so, all without exception whatever the form of the noun? But the definition of "Person" in 8.1.2. which is more developed that the one given here seems to be able to include also collective pseudonyms as it includes " an identity established by an individual (either alone **or in collaboration with one or more other individuals"**)
		See also 29.1.3
		Clear instructions on collective pseudonyms should be given, with clear criteria for choosing if a collective pseudonym should be considered a person or a corporate body. Is the fact that the form of the name of the collective pseudonym is similar to the name of a person or to the name of a corporate body that make the decision? And what criterion should beapplied when the form of the name of the collective pseudonym recalls neither a name of person nor a name of corporate body?
18.1.3 Resource	2	The term **resource** is used in chapters **19–22** to refer to a work, expression, manifestation, or item (see **18.1.5**).
		Our comment: It is prejudicial to the clarity of RDA that "resource" does not designate the same entities according to the chapter in which it is. In fact, in chapters 2 to 4 it designates a manifestation or an item (cf 1.1.2 The term *resource* is used in chapters **2–4** to refer to a manifestation or item), whereas in chapters 19 to 22 it can designate any entity of Group 1. It would be less ambiguous to use another term. Rectify the cross-reference in 18.1.4
18.1.6 Relationship Designator	3	The term **relationship designator** refers to a designator that indicates the nature of the relationship between persons, families, or corporate bodies represented by preferred access points and/or identifiers.

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Paragraph	Page	Comment
		Our comment: We find this sentence not very clear; here, it is not a question of relationships between persons, corporate bodies, etc. but between the resource described and the persons, corporate bodies, etc. associated with this resource. So we would suggest: "The term **relationship designator** refers to a designator that indicates the nature of the relationship between *the resource and* persons, families, or corporate bodies *associated with that resource and* represented by preferred access points and/or identifiers."
18.3 Core Elements ****	3	The definition for "Creator" is too restrictive as it is related only to the work; Yet it should be equally possible to associate creation with the expression: it is especially the case for the musical performers but not only (for example, an arranger).
18.4.2 Change in Responsibility	5	For instructions on changes in responsibility affecting the identification of works issued as multipart monographs, serials, or integrating resources that require the construction of a preferred access point representing a new work, see **6.27.3** **Our comment**: Rectify the cross reference in 6.1.3
18.4.2.1 Multipart Monographs	5	If a change in responsibility occurs between the parts of a multipart monograph, provide additional access points for any persons, families, or bodies associated with a later part, if considered important for access (see **19.1** , **20.1** , and **21.1**). **Our comment**: Uninteresting cross references: in these paragraphs one finds only a cross reference to 18.4.2; one goes round in circles.
18.4.2.2 Serials	5	Same remark as for 18.4.2.1 Multipart monographs
18.4.2.3 Integrating Resources	6	Same remark as for 18.4.2.1 Multipart monographs
18.5.1 Basic Instructions on Recording Relationship Designators 18.5.1.1 Scope	6	The term **relationship designator** refers to a designator that indicates the nature of the relationship between persons, families, or corporate bodies represented by preferred access points and/or identifiers. **Our comment**: We find this sentence not very clear; here, it is not a question of relationships between persons, corporate bodies, etc. but between the resource described and the persons, corporate bodies, etc. associated with this resource. So we would suggest: "The term **relationship designator** refers to a designator that indicates the nature of the relationship between *the resource and* persons, families, or corporate bodies *associated with that resource and* represented by preferred access points and/or identifiers." (Same remark as in 18.1.6.)

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Paragraph	Page	Comment
18.6 Note on persons, families and corporate bodies associated with a resource		If the relationship to a person, family, or corporate body associated with a resource requires explanation (e. g. in a case where an attribution of authorship is dubious), make one or more of the following types of notes, as applicable. **Our comment**: The presumed author (composer, etc.) does not appear within the relationships designators: it is a pity that this information be expressed only by way of a note.

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Chapter 19
Persons, Families, and Corporate Bodies Associated with a Work

Paragraph	Page	Comment
19.2.1 Basic Instructions on Recording Creators 19.2.1.1 Scope	2	A person, family, or corporate body responsible for compiling an aggregate work may be considered to be a creator of the compilation if the selection, arrangement, editing, etc., of content for the compilation effectively results in the creation of a new work. A person, family, or corporate body responsible for modifying a previously existing work in a way that substantially changes the nature or content of the original is considered to be a creator of the new work. The given criteria remain hazy and subjective. According to these criteria can one consider that the arrangers (for music) are "creators"? It seems not to be the case, as they are appearing among "contributors" (cf. 20.2). In the case when the arrangements made by composers are known as works of these composers and these arrangements appear in the thematic catalogue of these composers, then the arrangements constitute a real act of creation (for example, the arrangement for orchestra by Hector Berlioz of "Aufforderung zum Tanz" by Carl Maria von Weber (p.7)).
19.2.1 Basic Instructions on Recording Creators 19.2.1.1 Scope	3	Creators include corporate bodies responsible for originating,issuing, or causing to be issued, works ... **Our comment**: The corporate bodies that are publishing periodicals, series or collections of conference papers (compilation) that are the emanation of the activity (intellectual) of the corporate body should appear among the creators and not be considered as persons, corporate bodies or families indirectly associated with the resource described. See examples page 38-39: "California Academy of Sciences **Preferred access point representing the issuing body for:** Occasional papers of the California Academy of Sciences" "Gandhi-King Society **Preferred access point representing the issuing body for:** The acorn. **Published by the Philosophy Department of Eastern Illinois University (1986–1990) and the Philosophy Department of St. Bonaventure University (1990–); issued by the Gandhi-King Society"** "American Association of Zoological Parks and Aquariums American Zoo and Aquarium Association **Preferred access points representing the issuing bodies for:** Zoological parks and aquariums in the Americas. **Volumes for 1978–79 to 1993–94 issued by American Association of Zoological Parks and Aquariums; volumes for 1994–95 to 1996–97 issued by American Zoo and Aquarium Association"**

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Paragraph	Page	Comment

"Società italiana di gastroenterologia
Associazione italiana per lo studio del fegato
Preferred access points representing the issuing bodies for:
Digestive and liver disease : official journal of the Italian Society of Gastroenterology and the Italian Association for the Study of the Liver"

This case differs from that of corporate bodies under the auspices of which a particular work is published and that comes under the category of persons, corporate bodies or families indirectly associated with the resource described.
See examples page 38:

"Vilniaus Universitetas. Tarptautinių santykių ir politikos mokslų institutas
Preferred access point representing the corporate body associated with the work for: Lithuania under German occupation, 1941–1945 : despatches from US Legation in Stockholm / compiled and edited by Thomas Remeikis. — Vilnius : Vilnius University Press. — At head of title: Institute of International Relations and Political Science, Vilnius University
"
"West (Firm)
Preferred access point representing the corporate body associated with the work for: American law reports. ALR 6th, Annotations and cases. — [Eagan, Minnesota] : Thomson/West.
Publisher has significant responsibility for the creation of the work"

Paragraph	Page	Comment
19.2.1 Basic Instructions on Recording Creators 19.2.1.1 Scope	4	Creators include government and religious officials responsible for the following types of official communications: a) official communications by heads of state, heads of government, heads of dependent or occupied territories, or heads of international bodies (e.g., a message to a legislature, a proclamation, an executive order) b) official communications from a pope, patriarch, bishop, etc. (e.g., an order, decree, pastoral letter, bull, encyclical, constitution, or an official message to a council, synod, etc.) It does not clearly follow from the text that, in the two cases a) and b), two access points are established, one for the person and one for the corporate body; it is understood only from the examples.
19.2.1 Basic Instructions on Recording Creators 19.2.1.1 Scope	4	For instructions on providing preferred access points forpersons, families, or corporate bodies contributing to the realization of a work throughan expression (e.g., editors, translators, etc.), see **19.3.1.** It seems to us that the cross reference should point to chapter 20.
19.2.1.3 Recording Creators	5-33	It would be useful to add a clause illustrating the treatment of collective pseudonyms.

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Paragraph	Page	Comment
19.2.1.3 Recording Creators	5-33	It would be useful to add an example illustrating the case of the creator of a ballet choreography. A choreography is written by a choreographer by means of steps, movements, etc., and is intended for being represented more than once in the context of a living performance. Surely dancers are needed as actors are needed but these do not make part of the choreography: they perform it like musicians perform a musical work or actors perform a play. In 2009 the "Casse-noisette" of Petipa dating from 1845 is performed with the same body language and movements as at the time. Differing from a movie, it is not the question of a work coming from the collaboration between several intervening parties among which none has a more preeminent part. The choreographer is really the "creator" of the choreography which is a work of its own and not an expression of another work.
19.2.1.3 Recording Creators	5-33	It is a pity that the "relationship designator" be not indicated! Its presence would greatly enlighten the examples.
19.2.1.3 Recording Creators	7	Weber, Carl Maria von, 1786–1826 **Preferred access point representing the creator for:** Aufforderung zum Tanz : Rondo brillant für das Pianoforte, op. 65 / by Carl Maria von Weber ; arranged for orchestra by Hector Berlioz **Our comment**: In this particular case Carl Maria von Weber is the creator of the **adapted work** but not of the work. Berlioz is the creator of the work because this work is an integrating part of his thematic catalogue (L'invitation à la valse. H 90). See also 20.2.1.3, page 9.
19.2.1.3 Recording Creators	11	Asher, Robert E., 1910– Kotschnig, Walter M. (Walter Maria), born 1901 Brown, William Adams, Jr., 1894–1957 **Preferred access points representing the creators for:** The United Nations and economic and social co-operation / by Robert E. Asher, Walter M. Kotschnig, William Adams Brown, Jr., and associates **Our comment**: Why not "Kotschnig, Walter M. (Walter Maria),**1901-" ?**
19.2.1.3 Recording Creators	11	Gikow, Louise Lewis, Jim, 1952– **Preferred access points representing the creators for:** Miss Piggy's rules : swine-tested secrets for catching Mr. Right, keeping him & throwing him back when you've had enough / by Miss Piggy as told to Louise Gikow and Jim Lewis. **Miss Piggy is a fictitious character; Gikow and Lewis are the actual authors** **Our comment**: Which access point for "Miss Piggy" by which users may search ?

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Paragraph	Page	Comment
19.2.1.3 Recording Creators	12	Boetticher, Budd, 1916–2001 Bogdanovich, Peter, 1939– Fuller, Samuel,1912–1997 Penn, Arthur, 1922– Polonsky, Abraham Sherman, Eric Rubin, Martin, 1947– **Preferred access points representing the creators for:** The director's event : interviews with five American film-makers : Budd Boetticher, Peter Bogdanovich, Samuel Fuller, Arthur Penn, Abraham Polonsky / by Eric Sherman and Martin Rubin **Our comment**: Relationships designators are missing and this fact leads to believe that interveners and directors are on the same level.
19.2.1.3 Recording Creators	14-16	It would be useful to refer to chapter 25 "Related works" for mentioning creators of adapted works. And to reuse these examples in this chapter 25.
19.2.1.3 Recording Creators	15	Heuston, R. F. V. **Preferred access point representing the creator for:** Salmond on the law of torts. — 17th edition / by R.F.V. Heuston Heuston, R. F. V. Chambers, R. S. **Preferred access points representing the creators for:** Salmond and Heuston on the law of torts. — 18th edition / by. R.F.V. Heuston and R.S. Chambers Dutch, Robert A. **Preferred access point representing the creator for:** Roget's Thesaurus of English words and phrases. —New edition / completely revised and modernized by Robert A. Dutch **Our comment**: In these 3 examples, what allows to consider that it is a new work and not an expression ? The statement of responsibility is here related to the edition. Which are the criteria which allow to distinguish between a creator of a new work and a contributor associated with an expression of a work: - the lack of a term expressing a role in the statement of responsibility (creator of a new work) or, - the fact that there is one of a type "edited by …" (contributor associated with the expression) ? (cf the 3rd example in chapter 20, page 3).
19.2.1.3 Recording Creators	17	Victoria and Albert Museum Peabody Essex Museum **Preferred access points representing the creators for:** Furniture from British India and Ceylon : a catalogue of the collections in the Victoria and Albert Museum and the Peabody Essex Museum /

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Paragraph	Page	Comment
		Amin Jaffer ; assisted in Salem by Karina Corrigan and with a contribution by Robin D. Jones ; photographs by Mike Kitcatt, Markham Sexton and Jeffrey Dykes. — Salem, Massachusetts : Peabody Essex Museum
		Our comment: What do we do with Amin Jaffer ? Is he also considered as a creator or should he be considered as a contributor ?
19.2.1.3 Recording Creators	18	American Academy of Arts and Sciences. Committee on International Security Studies. Middle East Program **Preferred access point representing the creator for:** Transition to Palestinian self-government : practical steps toward Israeli-Palestinian peace : report of a study group of the Middle East Program, Committee on International Security Studies, American Academy of Arts and Sciences / Ann Mosely Lesch, principal author. T**he study group is unnamed** **Our comment**: What do we do with Ann Mosely Lesch ?
19.2.1.3 Recording Creators	19	Asia-Pacific Conference on Communications (10th : 2004 : Tsinghua University) **Preferred access points representing the creators for:** APCC/MDMC '04 : the 2004 joint conference of the 10th Asia-Pacific Conference on Communications and the 5th International Symposium on Multi-Dimensional Mobile Communications proceeding : August 29–September 1, 2004, Tsinghua University, Beijing, China / editors, Ke Gong, Zhisheng Niu, Pingyi Fan, Jian Yang International Symposium on Multi-Dimensional Mobile Communications (5th : 2004 : Tsinghua University) **Our comment**: The second access point should appear before the bibliographic description.
19.2.1.3 Recording Creators	21	Kansas Geological Survey **Preferred access point representing the creator for:** Geothermal map of North America / American map editors, David D. Blackwell and Maria C. Richards ; map production by the Kansas Geological Survey **Our comment**: What do we do with "map editors" ? Are they considered as related to the expression and treated as contributors ?
19.3.1 Basic Instructions on Recording Other Persons, Families, and Corporate Bodies Associated with a	33	**Our comment**: Only the case of corporate bodies under the auspices of which a particular work is published comes under the category of persons, corporate bodies or families indirectly associated with the resource described.

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Paragraph	Page	Comment
Work 19.3.1.1 Scope		See examples page 38: Vilniaus Universitetas. Tarptautinių santykių ir politikos mokslų institutas **Preferred access point representing the corporate body associated with the work for:** Lithuania under German occupation, 1941–1945 : despatches from US Legation in Stockholm / compiled and edited by Thomas Remeikis. — Vilnius : Vilnius University Press. — At head of title: Institute of International Relations and Political Science, Vilnius University West (Firm) **Preferred access point representing the corporate body associated with the work for:** American law reports. ALR 6th, Annotations and cases. — [Eagan, Minnesota] : Thomson/West. **Publisher has significant responsibility for the creation of the work** **Our comment**: The corporate bodies that are publishing periodicals, series or collections of conference papers that are the emanation of the activity (intellectual) of the corporate body should appear among the creators and not be considered as persons, corporate bodies or families indirectly associated with the resource described. See remark on 19.2.1.1.
19.3.1.3 Recording Other Persons, Families, and Corporate Bodies Associated with a Work	34- 39	It is a pity that - the "relationship designator" be not indicated! Its presence would greatly enlighten the examples - there is not a recall of the access points established for the creators rightly named.
19.3.1.3 Recording Other Persons, Families, and Corporate Bodies Associated with a Work	34	For Macmillan, Alexander, 1818–1896 Ellis, Frederick Startridge, 1830–1901 **Preferred access points representing the addressees for:** The Rossetti-Macmillan letters : some 133 unpublished letters written to Alexander Macmillan, F.S. Ellis, and others, by Dante Gabriel, Christina, and William Michael Rossetti, 1861–1889 / edited, with an introduction and notes, by Lona Mosk Packer **Our comment**: Delete "For" before "MacMillan, Alexander, 1818-1896 in the first preferred access point
19.3.1.3 Recording Other Persons, Families, and Corporate Bodies Associated with a Work	34	Lot, Ferdinand, 1866–1952 **Preferred access point representing the dedicatee for :** Mélanges d'histoire du Moyen Âge / offerts à Ferdinand Lot par ses amis et ses élèves **Our comment**: "offerts à Ferdinand Lot" pertains to the title proper (it is linguistically linked to the title) and does not constitute a statement

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Paragraph	Page	Comment
		of responsibility.
19.3.1.3 Recording Other Persons, Families, and Corporate Bodies Associated with a Work ****	37	Lee, Ang, 1954– McMurtry, Larry Ossana, Diana Schamus, James, 1959– Prieto, Rodrigo Focus Features River Road Entertainment (Firm) **Preferred access points representing the other persons and corporate bodies associated with the work for***: Brokeback Mountain / Focus Features and River Road Entertainment ; directed by Ang Lee ; screenplay by Larry McMmurtry & Diana Ossana ; producers, Diana Ossana, James Schamus. ― Credits: Director of photography, Rodrigo Prieto ; art director, Laura Ballinger ; edited, Geraldine Peroni, Dylan Tichenor ; music, Gustavo Santaolalla ; costume designer, Marit Allen ; production designer, Judy Becker **Our comment**: Where is the rule allowing to know which type of role states that a person or corporate body is considered to be associated with the work and is not a contributor? A more explanatory comment on the choices made in RDA would be useful. Why choose the director of photography and not the composer of the original music who is an integrating part of the categories having the copyright for the movie according to European law? . Why are all the interveners in a movie scattered between work and expression? According to this example, are on the side of work: director, screenplay writers, producers, director of photography, producing company; on the side of expression: music composer, set designer, production designer, costume designer, art director, actors. In our viewpoint ALL should be treated at the level of the work.
19.3.1.3 Recording Other Persons, Families, and Corporate Bodies Associated with a Work	38	Gandhi-King Society **Preferred access point representing the issuing body for:** The acorn. **Published by the Philosophy Department of Eastern Illinois University (1986–1990) and the Philosophy Department of St. Bonaventure University (1990–); issued by the Gandhi-King Society** **Our comment**: The example is not clear: here too, an explanatory comment on the case illustrated would be useful.
19.3.2 Other Person or Corporate Body Associated with a Legal Work	39-53	Why maintain all these specific parts for legal works: abundant particular cases? In a prospect of applying RDA in non Anglo-Saxon countries, many of these rules will not be relevant. To be adapted at a national level according to the nature of the law?

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Paragraph	Page	Comment
19.3.2.6 Person or Corporate Body Prosecuted in a Criminal Trial, etc.	44	Latrimouille, Hilaire Latrimouille, Hilaire **Preferred access point representing the defendant for:** *T*he charge to the jury and the sentence by Judge TheodoricR. Westbrook in the case of Hilaire Latrimouille / reported by James M. Ruso, court stenographer **Our comment**: Delete the second "Latrimouille, Hilaire".
19.3.3 Other Person or Corporate Body Associated with a Religious Work	53-58	Why maintain all these specific parts for religious works: abundant particular cases?
19.3.3 Other Person or Corporate Body Associated with a Religious Work 19.3.3.1 Application	53	Apply the instructions given under 19.3.2.2 to theological creeds, confessions of faith, etc., accepted by one or more denominational bodies. **Our comment**: Rectify the cross reference in 19.3.3.2
19.3.3.4 Body Within a Church, etc., Associated with a Liturgical Work.	57-58	If the work is special to the use of a particular body within the church (e.g., a diocese, cathedral, monastery, religious order), record that body applying the basic instructions on recording other persons, families, and corporate bodies associated with a work given under **19.3.1** Cyprus (Archdiocese) **Preferred access point representing the particular body associated with the work for:** Hēmerologion Ekklēsias Kyprou : typikē diataxis Hierōn Akolouthiōn, 1997. **A liturgical calendar; romanized title** Catholic Church. Maronite Patriarchate of Antioch (Syria) **Preferred access point representing the particular body associated with the work for:** Official text of the divine liturgy according to the Maronite Antiochene Church / translated by the Maronite Seminary and revised by the Chancery Office **Our comment**: If we understand correctly the rule given in 19.3.3.4, it is considered that no "creator" exists in these two examples but only corporate bodies associated with the work. We agree with this analysis. What is the relationship designator to be used in these two cases: "Issuing body"?

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Chapter 20
Persons, Families, and Corporate Bodies Associated with an Expression

Paragraph	Page	Comment
20.2.1 Basic Instructions on Recording Contributors 20.2.1.1 Scope ****	2	Does the notion of creator not exist too for the expression: the author of a translation? Or else should it be understood that any responsibility related to an expression means contribution? Then, one would always consider things from the viewpoint of the work and not from that of the bibliographic entity concerned. In this case, the performers in sound recordings would not effectively be creators as they act at the level of the expression but the performers in a cinematographic work should be put at the level of the work as "other persons … associated with a work", cf. 19.3. Moreover the "cinematographers" should be put at the level of the work as "other persons … associated with a work", cf. 19.3.
20.2.1.3 Recording Contributors	3	Goss, Charles Mayo, born 1899 **Preferred access point representing the editor for:** Anatomy of the human body / by Henry Gray. — 25th edition / edited by Charles Mayo Goss **Our comment**: RDA should delimit the boundaries between this case and those illustrating chapter 19 (page 15). Why not "Goss, Charles Mayo, **1899-19..**"?
20.2.1.3 Recording Contributors	4	Momigliano, Eucardio, born 1888 **Preferred access point representing the editor of compilation for:** Tutte le encicliche dei sommi pontefici / raccolte e annotate da Eucardio Momigliano **Our comment**: Why not "Momigliano, Eucardio, **1888-19..**"?
20.2.1.3 Recording Contributors	9	Berlioz, Hector, 1803-1869 **Preferred access point representing the arranger of music for:** Aufforderung zum Tanz : Rondo brillant für das Pianoforte, op. 65 / by Carl Maria von Weber ; arranged for orchestra by Hector Berlioz **Our comment**: In this particular case Berlioz is the creator of the work because this work is an integrating part of his thematic catalogue (L'invitation à la valse. H 90). The adapted work "Aufforderung zum Tanz » by Carl Maria von Weber should form the subject of relationships between works. See also 19.2.1.3, page 7.
20.2.1.3 Recording Contributors	10	Chieftains **Preferred access point representing the performer for:** Bonaparte's retreat. **Folk tunes and songs by various composers performed by the band The Chieftains**

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Paragraph	Page	Comment
		Blind Boys of Alabama **Preferred access point representing the performer for:** If I had a hammer / Blind Boys of Alabama. **Traditional soul gospel music performed by the group The Blind Boys of Alabam** **Our comment**: Why this difference between these two examples in the bibliographic description? In the second one, "The Blind Boys of Alabama" are transcribed in a statement of responsibility when "The Chieftains" are not transcribed in the first one; yet it seems that in the two case, neither group is author of the different pieces.
20.2.1.3 Recording Contributors ****	12	Ledger, Heath, 1979-2008 Gyllenhaal, Jake, 1980- Cardellini, Linda, 1975- Faris, Anna, 1976- Hathaway, Anne, 1982- Williams, Michelle, 1980- Quaid, Randy, 1953- **Preferred access points representing the performers for**: Brokeback Mountain / Focus Features and River Rroad Entertainment ; directed by Ang Lee ; screenplay by Larry McMurtry & Diana Ossana ; producers, Diana Ossana, James Schamus. — Cast: Heath Ledger, Jake Gyllenhaal, Linda Cardellini, Anna Faris, Anne Hathaway, Michelle Williams, Randy Quaid **Our comment**: If performers of a musical work come really under the expression then the actors in a movie pertain totally to the work and therefore should appear in 19.3.
20.2.1.3 Recording Contributors	12	Manning, James, 1803-1896 **Preferred access points representing the court reporters for:** Common bench reports : cases argued and determined in the Court of Common Pleas / [reported] by James Manning, T.C. Granger, and John Scott. **Cited as Manning, Granger & Scott** Granger, Thomas Colpitts, died 1852 Scott, John, 1803-1896 **Our comment**: Les deux derniers points d'accès devraient apparaître avant la description bibliographique. The last two access points should appear before the bibliographical description.
20.2.1.3 Recording Contributors	13	Compiler of Laws Compiler of Regulations, etc. etc. **Our comment**: According to appendix I, "compiler" is associated at the level of the

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Paragraph	Page	Comment
		work as a creator; "editor of compilation" should be used for a compiler that is situated at the level of the expression as a contributor.

compiler
A person, family, or corporate body responsible for creating a work through the act of compilation, e.g., selecting, arranging, aggregating, and editing content. For a compiler as a contributor, see *editor of compilation,* **I.3.1**.

Accordingly, it would be better to avoid the term "compiler" in the captions of the chapter 20 and replace it by "editor of compilation".

This confusion shows that the boundaries are not clear between compilations that constitute a new work (for example, anthologies of literary texts) and those that are only expressions (legal compilations according to the examples).

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Chapter 21
Persons, Families, and Corporate Bodies Associated with a Manifestation

Paragraph	Page	Comment
21.1.2 Recording Persons, Families, and Corporate Bodies Associated with a Manifestation	2	If the resource being described contains two or more manifestations associated with different persons, families, or corporate bodies, record the persons, families, and corporate bodies associated with each of the manifestations in the aggregate resource as instructed under 21.2–21.4. **Our comment**: Which real case is concerned: a multipart monograph or a continuing resource with a change of publisher or distributor in the course of publication? It would be useful to give an example of this case.
21.2 Producer	2-3	Here it is the case of archival producers. It would be useful to indicate this in the caption: "Archival producer" ? This would be very useful to distinguish them from other categories of producers: producers of sound recordings who are responsible for the expression and producers of videograms who are associated at the level of the work.
21.2.1.3 Recording Producers	3	Edison, Thomas A. (Thomas Alva), 1847-1931 **Preferred access point representing the producer for:** Annabella / produced by Thomas A. Edison. — 1897. **An early motion picture** **Our comment**: Why the responsibility is not associated with the work as for current movies? Or else are two access points established, one for the work AND one for the manifestation? This example lacks cruelly explanations that would justify this treatment.
21.2.1.3 Recording Producers	3	Grainger, Percy, 1882-1961 Cross, Burnett **Preferred access points representing the producers for:** Sliding pipe free music invention / Percy Grainger, Burnett Cross. — 1946. **An experimental musical instrument made from masonite, wire, string, and tape. Grainger and Cross's earliest experimental model to produce gliding tones** **Our comment**: Here too, one could consider that one is dealing with a work.
21.2.1.3 Recording Producers	3	Weequahic High School (Newark, N.J.) **Preferred access points representing the producer for:** Bookends made with bricks from the house in which Stephen Crane was born / prepared by industrial arts students in Weequahic High School, Newark, New Jersey. — [1940?]. — "These bookends were constructed from bricks taken from the house in which Stephen Crane was born, 14 Mulberry Place, Newark,N.J., at its demolition

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Paragraph	Page	Comment
		in October, 1940"—Inscription
		Our comment: Same remark as for "Grainger, Percy, 1882-1961 Cross, Burnett"
21.3.1.3 Recording Publishers	5	Women's Studio Workshop **Preferred access points representing the publishers for:** The Queen of Wands : a paper sculpture / Susan E. King. — Rosendale, NY : Women's Studio Workshop ; Santa Monica, CA : Paradise Press, ©1993. — "Printed offset by Paul Muhly at Visual Studies Workshop Press, Rochester, New York"--Instruction card. **A paper construction issued in a plastic envelope with two cards that bear publication information and instructions for operating Paradise Press**
		Our comment: Why a single editor forms the subject of an access point when there are two names in the publication statement ?

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Chapter 22
Persons, Families, and Corporate Bodies Associated with an Item

Paragraph	Page	Comment
22.1.2 Recording Persons, Families, and Corporate Bodies Associated with an Item	1	If the resource being described contains two or more items associated with different persons, families, or corporate bodies, record the persons, families, and corporate bodies associated with each of the items in the aggregate resource as instructed under **22.2–22.3**
		Our comment: We do not see to which case this rule can apply: one item composite or aggregated from several incomplete items?
22.4.1.3 R recording Other Persons, Families, and Corporate Bodies Associated with an Item	5	Reitz, Ralph B. **Preferred access point representing the collector for:** 100 botanical specimens from Meadville and vicinity / collected and presented to Allegheny College, by Ralph B. Reitz. **One hundred specimens collected from 1887 to 1889, mounted in a scrapbook**
		Our comment: Why Ralph B. Reitz is not considered as the producer of this herbarium that is a non published resource ? Or else are two access points established, one for the work AND one for the item?

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Chapter 24
General Guidelines on Recording Relationships
Between Works, Expressions, Manifestations, and Items

Paragraph	Page	Comment
24.1.3 Related Work, Expression, Manifestation, and Item ****	2	The current wording seems to imply that all the relationships exist only between entities on the same level. The relationships between entities of different levels do not seem to have been considered though they exist. For example, the relationship between "manifestation" and "item" in the case of a facsimile reproduction of a particular item chosen according to its specific characteristics.
24.4.3 Description of the Related Work, Expression, Manifestation, or Item Unstructured Description	6	"Filmed with three other titles" **Our comment**: This example is a bit flimsy: this kind of note does not give precise information.
24.4.3 Description of the Related Work, Expression, Manifestation, or Item Unstructured Description	6	Motion picture films and sound and video recordings transferred to Library of Congress Motion Picture, Broadcasting and Recorded Sound Division **Our comment**: How is it a relationship between another work, expression, manifestation or item? It is just information on a change of location: the item remains the same even if its location is changing.
24.5.1 Basic Instructions on Recording Relationship Designators 24.5.1.2 Sources of Information	6	"Take information on the nature of the relationship between works, expressions, manifestations, or items." **Our comment**: This sentence is incomplete; what is to be understood: "Take information on the nature of the relationship between works, expressions, manifestations, or items *from any source*."?
24.7.1.3 Recording Sources Consulted	10	Schoenberg, Arnold. Gurrelieder, ℗ 1995: booklet, page 7 (The libretto is based on the Gurresange (1868) by Jens Peter Jacobsen; it was translated by Robert Franz Arnold, and set by Schoenberg with some alterations) **Our comment**: The reference should be more complete in order to identify the manifestation to which the record corresponds: either the identifier of the manifestation or the statement of publication should be indicated. The date givenhere applies to the recording therefore to an expression and not to the manifestation.
24.8 Cataloguer's Note	11-12	The examples mix up the notes meant for the cataloguers with notes useful to the users.

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Chapter 25
Related Works

Paragraph	Page	Comment
25.1.1.3 Referencing Related Works	2	*Review of:* Docurama: NVG-9830 Resource identifier for the subject of a DVD review Gabriel Marcel's The mystery of being / Thomas C. Anderson. — ISBN 978-0-87462-669-8 **Resource described:** The mystery of being / by Gabriel Marcel ; English translation by René Hague. **ISBN provided in conjunction with a description of the describing work** **Our comment**: In these two examples the identifiers do not apply to the works but to the manifestations that embody these works.
25.1.1.3 Referencing Related Works Identifier for the Related Work	2	*Contains:* Blaník / Bedřich Smetana. — Plate number: 3646 **Resource described:** Má vlast : symphonic poem = Mein Vaterland : sinfonische Dichtung / Bedřich Smetana. **Plate number provided in conjunction with a description of the part of the expression.** Blaník **is part of Smetana's cycle of six symphonic poems,** Má vlast **Our comment**: This example should appear in chapter 26 (where it appears in part) as the comment is really specifying that the level is the one of the expression. Moreover, the identifier applies to the manifestation and therfore is not appropriate.
25.1.1.3 Referencing Related Works Preferred Access Point Representing the Related Work	6	*Contains:* Bax, Arnold, 1883-1953. Sketches. Dance of wild Irravel *Contains:* Bax, Arnold,1883-1953. Paean; arranged *Contains:* Bax, Arnold, 1883-1953. Symphonies, no. 3 **Resource described:** Dance of wild Irravel ; Paean ; Symphony no. 3 / Sir Arnold Bax. **An audio CD containing performances of three works by Bax**
****		*Contains:* Wizard of Oz (Motion picture : 1910) *Contains:* Magic cloak of Oz *Contains:* His majesty, the Scarecrow of Oz *Contains:* Wizard of Oz (Motion picture : 1925) *Contains:* Wizard of Oz (Motion picture : 1933) *Contains:* Wizard of Oz (Motion picture : 1939) **Resource described:** The Wizard of Oz / a Metro-Goldwyn-Mayer picture ; produced by Loew's Incorporated ; screen play by Noel Langley, Florence Ryerson and Edgar Allan Woolf ; produced by Mervyn LeRoy ; directed by Victor Fleming. — Three-disc collector's edition. **A three-disc DVD set of the 1939 motion picture that also includes earlier short and feature-length motion pictures based on the same characters**

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Paragraph	Page	Comment
		Our comment: In these two examples, the aggregate is constructed only at the level of the manifestation: it is not a work composed from several other works (like "À la recherche du temps perdu » by Marcel Proust) but it is a compilation made by a publisher.
		WE ABSOLUTELY ARE AGAINST ELABORATING FALSE WORKS THAT CORRESPOND TO MANIFESTATIONS.
25.1.1.3 Referencing Related Works Structured Description of the Related Work	10-11	*Described in:* Virginia Woolf : a list of manuscripts. — London : Spencer, 1986
		Described in: Sibelius, Symphony no. 5 / James Hepokoski. — Cambridge ; New York : Cambridge University Press, 1993. — (Cambridge music handbooks) **Resource described:** Symphony no. 5 in E-flat major, op. 82 / Jean Sibelius. **A score**
		Our comment: Here it is a specific manifestation that is described, not the work. We make the same remark for the last three examples of page 11.

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Chapter 26
Related Expressions

Paragraph	Page	Comment
26.1.1.3 Referencing Related Expressions	2	*Contains:* Plate number: E.E. 3646 **Plate number provided for** Blaník, part of Bedřich Smetana's cycle of six symphonic poems, Má vlast **Our comment**: This identifier applies to the manifestation and not to the expression.
26.1.1.3 Referencing Related Expressions Preferred access point representing the related expression	2	This is never explicitly written but according to the examples the first expression (original one) of a work is identified by the access point that represents the work.
26.1.1.3 Referencing Related Expressions Structured description of the related expression	2	*Revision of:* Biology of fishes / Carl Bond. — 2nd edition. — 1996 **Resource described:** Bond's Biology of fishes / Michael Barton. — 3rd edition — ©2007 **Our comment**: Here it is a specific manifestation that is described, not the work.

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Chapter 27
Related Manifestations

Paragraph	Page	Comment
27.1.1.3 Referencing Related Manifestations ****	2	*Special issue of:* ISSN 0024-4937 **Resource described:** Granites and migmatites : their temporal, spatial and causal relationships / edited by Carlo Dietl, Friedrich Finger. — Amsterdam : Elsevier, 2008. **A special issue of the journal** Lithos *Special issue of:* Art and AsiaPacific = ISSN 1039-3625 **Resource described:** Art AsiaPacific almanac. —New York : Art AsiaPacific, ©2006- . — Annual special issue of Art and AsiaPacific. **ISSN provided in conjunction with the key title of the related manifestation** **Our comment**: *"Special issue of"* is a relationship between works and not between manifestations. This relationship should appear in chapter 25.
27.1.1.3 Referencing Related Manifestations	4-5	*Filmed with:* The Jewish faith : its spiritual consolation, moral guidance, and immortal hope : with a brief notice of the reasons for many of its ordinances and prohibitions : a series of letters answering the inquiries of youth / by Grace Aguilar. — London : Richard Groombridge and Sons, 1846 **Resource described:** Catalogue sommaire des manuscrits indiens, indo-chinois & malayo-polynésiens / par A. Cabaton. — Paris : Ernest Leroux éditeur, 1912 **Our comment**: It seems that by mistake two examples have been confused.

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Chapter 28
Related Items

Paragraph	Page	Comment
28.0 Purpose and Scope	1	This chapter provides general guidelines and instructions on recording relationships between items, BUT in the case of fac simile reproductions, it is a relationship between a manifestation and an item and not a relationship between items. See the example at the end of the page.
28.1.1.3 Referencing Related Items	1	**Facsimile of:** Bodleian Library: MS. Junius 11 Accession number provided for related item **Our comment**: In the case of facsimile reproductions, it is a relationship between a manifestation and an item and not a relationship between items.

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Appendix A
Capitalization

Paragraph	Page	Comment
A.3.1 General guideline	4	For example : 3rd example, De bello**w** Gallico ; delete "w".
A.3.2 Other terms associated with titles of works	4	For example, 2nd example Guillaume (Chanson de geste) **Our comment:** This use of patentheses and capitalization seems odd.
A.4.3 Titles of Works That Have Merged or Been Absorbed	7	"When one work absorbs or merges with another and incorporates that work's title with its own, do not capitalize the first word of the incorporated title unless the guidelines given under A.10–A.53 applicable to the language involved require its capitalization for another reason. For Example: Farm chemicals and crop life not Farm chemicals and Crop life" **Our comment:** Discrepancy with French rules (AFNOR Z 44-063 "documentation - Cataloguing of continuing resources – Drafting of the bibliographical description") that retains the capitalization of the incorporated title.
A.9 Details of elements	9	"Capitalize the first word or abbreviation of a word when recording details of an element (e.g., 7.13.1.4). Capitalize other words as instructed under A.10–A.53 , as applicable to the language involved." **Our comment:** Reference 7.13.1.4 doesn't exist
A.11.5.3 Civil and military titles	13	Why is the prescription "capitalize such words as president, ..." put in end note and not in the body of the text?
A.12 Names of peoples, etc.	15	"Capitalize the name of a people, race, tribe, or ethnic or linguistic group." **Our comment:** The use of the term "race" makes not a very good effect on our side of Atlantic ocean.
A.33.1 Bulgarian, Proper names and their derivatives	38	"Do not apitalize names of peoples, races, and residents of specific localities: българин; софиянец; семит." **Our comment:** The use of the term "race" makes not a very good effect on our side of Atlantic occan. Add the missing "c" to "apitalize".

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Paragraph	Page	Comment
A.38.1 French, Proper names and their derivatives	41	last indent "Do not capitalize a common noun used as a generic word in a geographic name: *la mer du Nord*; l'île aux Oiseaux." **Our comment:** Put "*l'île aux Oiseaux*" in italics.
A.38. French A.38.2 2 Names of corporate bodies	42	"In general, capitalize the first word, any adjectives preceding the first noun, the first noun, and all proper nouns in the names of corporate bodies: *Société de chimie physique; Grand Orchestre symphonique de la R.T.B; église réformée de France*. Notable exceptions: *Société des Nations; Nations Unies*." **Our comment:** "*église réformée de France*" is to be capitalized (Église réformée de France) according to the rule A.38.7, 2nd indent.
A.42 Latin	46	"Apply the guidelines on English given under A.10–A.30." **Our comment:** Should the cataloguers who speak other languages than English follow this rule too ?

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Appendix B
Abbreviations

Paragraph	Page	Comment
B.5.1 Dimensions	2	"Use abbreviations prescribed in B.7 for terms used for dimensions (see 3.5). **Our comment:** Metric symbols are not abbreviations; such symbols are not followed by a full stop." Other symbols in B.7 are not abbreviations, particularly symbols for units of time. See remark on B.7 where ISO 31-1 *Quantities and units – Part one: space and time* is ignored for units of time.
B.7 Roman alphabet abbreviations	3-4	"Term Abbreviation" **Our comment:** In this list, some abbreviations for units of time are not in accordance with ISO 31-1 *Quantities and units – Part one: space and time.* This remark has already been made in previous comments. These abbreviations are: : hour, -s hr. whereas ISO 31 = **h** minute, -s min. whereas ISO 31 = **min** second, -s sec. whereas ISO 31 = **s** … numéro (French) no **I**n French, according to the *Règles typographiques de l'Imprimerie nationale* and *Le bon usage : grammaire française* / Maurice Grevisse, the abbreviation for numéro is rather "n°" with the "o" superscript. … partie, -s ptie, pties We do not abbreviate this term in our catalogues in French. … inches per second ips but in 3.16.4.3 Recording playing speed is indicated by "m/s" and "cm/s".ed..

Appendix C
Initial articles

Paragraph	Page	Comment
C.1 General instructions	1	Spaces are missing between words in the 3 indents.

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Appendix D
Record Syntaxes for descriptive data

Paragraph	Page	Comment
D.2.1 Order of elements		General remark : There is no indication of the preceding punctuation used in an ISBD presentation for the first element of each area (except the first element of the first area). The punctuation is indicated only from the second element of each area. This punctuation, point, space, dash, space (. –), still exists in a record displayed according to ISBD unless each area would be displayed on a line of its own. Even in this case, there would be a punctuation at the end of each area preceding another one, i.e a final point at the end of the last element of the area.
D.2.1 Order of elements	D-2	Preceding punctuation "point, space, dash, space (. –)" is missing for the first element of the area 3.1.1 Statement of scale; see General remark at the head of the remarks on appendix D.
D.2.1 Order of elements	D-3	Preceding punctuation "point, space, dash, space (. –)" is missing for the first element of the area 3.2 Music format statement and 3.3 Numbering (serials).
D.2.1 Order of elements	D-3	ISBD 4.3 Statement of function of distributor : There is no exact correspondence between ISBD 4.3 and RDA element "distributor's name ". In ISBD, brakets [ ] are used only for the function when this one does not appear in the statement on the source of information and then is added by the cataloguer.
D.2.1 Order of elements	D-3	Preceding punctuation "point, space, dash, space (. –)" is missing for the first element of the area 4.1 Place of publication, …first place
D.2.1 Order of elements	D-4	Preceding punctuation "point, space, dash, space (. –)" is missing for the first element of the area 5.1 Specific material designation and extent of resource
D.2.1 Order of elements	D-4	Preceding punctuation "point, space, dash, space (. –)" is missing for the first element of the area 6.1 Title proper of series and also the punctuation "Parentheses '( )'" enclosing the statement of series
D.2.1 Order of elements	D-7	Preceding punctuation "point, space, dash, space (. –)" is missing for the first element of the area 8.1 Resource identifier
D.2.2.1 General instruction	D-7	The indication "[GMD]" should be replaced by the real and exact GMD (while expecting the new area 0 of ISBD) in order to make the example understandable or even better, replace this example by another one since the brackets of GMD are recommended punctuation and have not the same signification as the ones used to enclose "produced by " to signal a mention restituted.

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Paragraph	Page	Comment
D.2.2.2 Title and statement of responsibility area	D-9	The indication "[GMD]" should be replaced by the real and exact GMD (while expecting the new area 0 of ISBD) in order to make the example understandable or, delete the mention "[GMD]"
D.2.3.2 Presentation of a multilevel description	D-12-	The indication "[GMD]" should be replaced by the real and exact GMD [Printed Text] », « [Sound Recording] » and « [Printed Text] in order to make the examplse understandable or, delete the mention "[GMD]"
D.3 MARC 21 format for bibliographic data	D-14	027 Standard technical report number In case where 027 Standard technical report number would refer to ISO 10444, this ISO standard is withdrawn and no more used since 2007-12-14

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Appendix G
Titles of nobility, terms of rank, etc.

Paragraph	Page	Comment
G France	1	The terms of rank in France are: **Masculine Feminine** Duc Duchesse Marquis Marquise Comte Comtesse Vicomte Vicomtesse Baron Baronne Chevalier écuyer **Our comment:** In France we do not capitalize these terms that are qualifiers in a catalogue.

Appendix H
Dates in the Christian Calendar

Paragraph	Page	Comment
H.1 B.C. and A.D. dates	1	"For example: 14th**e** century B.C. Period of activity associated with Queen Nefertiti of Egypt −71 B.C. Date of death of Spartacus approximately 495–429 B.C. Approximate dates of birth and death of Pericles" **Our comment:** 1st example: delete the "e" in "14th**e**" 2nd example: the dash before the date is redundant with "B.C."

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Appendix I
Relationship Designators
Relationships Between a Resource and Persons, Families,
and Corporate Bodies Associated with the Resource

Paragraph	Page	Comment
		General structure of this appendix I Rather than having sub-parts according to the entity under which the resource comes, it would be clearer to have all the functions in an alphabetical order in some sort of a table where the last column would indicate which bibliographic entity the function may apply to. The relationship designators are unequally developed according to the fields: they are much developed for law and different types of composeurs but oddly poor in other fields such as music for performers. It is unfortunate that the relationship designators do not allow to specify the notion of supposed attribution.

Appendix J
Relationship Designators
Relationships Between Works, Expressions, Manifestations, and Items

Paragraph	Page	Comment
7.3.6 Sequential Work Relationships	7	Typo: rectify 7.3.6 Sequential Work Relationships in 7.**2**.6 Sequential Work Relationships
J.3.6 Sequential Work Relationships	8-9	List of links under "succeeded by (work)", from "**absorbed in part (work)" to "supersedes in part (work)" the links** are the same links those listed under "preceded by (work)":above. The correct links should be "**absorbed by (work)" to "superseded in part by (work)".**
J.2.6 Sequential Expression Relationships	16	Typo: rectify "J.2.6 Sequential Expression Relationships" in "J.**3**.6 Sequential Expression Relationships"

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Appendix K
Relationship Designators
Relationships Between Persons, Families, and Corporate Bodies

Paragraph	Page	Comment
K 2.3 Relationship Designators to Relate Persons to Corporate Bodies	2	Appropriate terms from the list below are recorded in conjunction with the preferred access point or identifier for a related person (see **30.1**). *employee* The person employed by a corporate body. *founder* The person who founded the corporate body. *group member* The person who is a member of the performing group, expedition, etc. *incumbent* The person holding an office in the corporate body (e.g., the incumbent president). *sponsor* The person sponsoring the corporate body."» **Our comment:** A relationship designator is lacking concerning the aspect of the authority exerted by a person on a corporate body, for instance the authority of a conductor upon his/her orchestra (relationship expressed in French by the term "dirige").

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Appendix M
Complete examples

Paragraph	Page	Comment
General remark		What do these asterisks mean that follow certain element data? for a same element, there is or not an asterisk: compare "Audio recording – Book" (p. 1) and "Audio recording – Music" (p. 5) for the elements "Publisher's name" and "Copyright date". If these elements are mandatory elements, then this should be repeated here, in this annex. We do not know any more where in RDA these elements are listed.
Audio recording – Music	5	"RDA element Copyright date" **Our comment:** Why to have 2 elements strictly similar (except the asterisk for one of them) whereas the resource is unique and only one work is recorded?
Book 2 *******	12	"**2.15** Identifier for the ISBN 978-0-7890-3026-9 manifestation * **2.15** Identifier for the ISBN 0-7890-3026-8 manifestation * **2.15** Identifier for the ISBN 978-0-7890-3027-6 (paperback) manifestation * **2.15** Identifier for the ISBN 0-7890-3027-6 (paperback)" **Our comment:** 4 ISBN appear by pairs (ISBN-10 and ISBN-13): one pair is qualified but nobody knows if this pair is related to the manifestation described or to another manifestation. Nothing in the data elements allows to know which manifestation is described and MARC 21 is not clearer. It is important to qualify all identifiers when they are all present in the record. In our national bibliography, if the case appears, all identifiers are qualified.
Book 1 & Book 2	9-13	From the moment when « volume » is recorded as « carrier type », we do not see why the extent type would not be « 1 » as it is the case for the other resources (see for instance the example « 1 CD »).
Web site – Integrating resource	32	2.3.2 Title proper * Tolkien Society home page 2.3.6 Variant title Welcome to the Tolkien Society home page **Our comment:** A title proper is a skind of making by the cataloguer even if in 99% of cases the title proper reads absolutely the same as the title found on the resource In the present case of the online resource by the Tolkien society, this resource is limited to a home page forever updated; what is really visible on this page "Welcome to home page of The Tolkien

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Paragraph	Page	Comment
		Society " is taken as a variant title. In the metadata of this page, one can find: "<head> <title>Home Page - The Tolkien Society</title>…*[the content of this tag is invisible on the page itself]* <body> <div id="banner"><img src="images/trees_banner.gif" alt="Welcome to home page of The Tolkien Society" Since the data have been manipulated to make the title proper, they might as well have been completely manipulated and just the name of the corporate body taken to form the title proper that, in fact, is typographically separated from the rest of the formulation.
Corporate body 5	73	"Encyclop…dia Britannica (Lewis and Clark Expedition (1804–1806))" **Our comment:** Are 3 points really in the word "Encyclop…dia" on the source consulted?

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Glossary

Paragraph	Page	Comment
General remarks		Is the glossary a list of the elements of identification?
		Many definitions are tautological, for instance: "distributor = a person, family, or corporate body responsible for distributing a resource"; or, all the definitions of entries that begin with "related" (that have no great use). It is the same for "title screen" that, in the body of the textis said to give the source for the title proper and is defined by the fact that the title proper is found there.
		Many definitions are redundant and useless, for instance: "colour of image" adds nothing to "colour content" as it is simply "colour content" applied to "moving image", then it is useless to make a specific entry. It is the same for "colour of resource designed for persons with visual impairments", the current definition adds nothing (as it seems that it is not colours that are destined to visually impaired but the resource It is the same for "production method for manuscripts " and "production method for tactile resources", for instance.
Cartridge	5	A reference to « Microfiche cartridge » is necessary as the definition of « cartridge » applies uniquely to electronic resouce. Then to be able to retrieve the reference to microforms is required.
Country	10	Delete the definition of « country : a country with which the person is identified.", as this term has no specific meaning in RDA, and moreover it is restrictive as applicable too to resources.
Expression	13-14	The definition of "expression" is sufficient, that of "expression of work" is useless. Make a choice between "realization" and "realisation". It is the same for the other entities: each time, repeating the definition with the relation to another entity (no more in the definition but in the entry) is useless.
Gender	16	**"Gender** The gender with which a person identifies." **Our comment:** Delete this definition, that is too flimsy and this term having no specific meaning in RDA.
Identifier for the Corporate Body, etc.	17-18	It would be more simple and less redundant to define "identifier" and to specify to which entities it may apply.
ISSN of series, ISSN of subseries	18	Give the ISO definition as defined in the standard ISO 3297. **"ISSN International Standard Serial Number** eight digit number, including a check digit and preceded by the

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Paragraph	Page	Comment
		alphabetic prefix ISSN, assigned to a continuing resource by the ISSN Network"
Item-specific carrier characteristics of early printed resources	19	Delete this definition that is useless in regard to the preceding one "**Item-specific Carrier Characteristics** A characteristic that applies to the carrier or carriers of the specific item being described. »
Note on changes in carrier characteristics...	24	To detail this series of notes is useless here, their place is in the body of RDA.
Section	37	When there are 2 definitions it should be clearer to number them (as ISBD does, for instance "series"): it makes reference to them easier.
Statement of responsibility	39-40	It would be more simple and less redundant to define "statement of responsibility" and to specify to which entities it may apply.