To: Joint Steering Committee for Revision of AACR

From: Deirdre Kiorgaard, Chair, JSC

Subject: RDA: Resource Description and Access Part I - Review by other rule makers of December 2005 Draft - Germany

These are comments on the draft Part I of RDA received from Die Deutsche Bibliothek, and the expert groups of the Committee for Library Standards.
A draft of “RDA – Resource Description and Access”, Part I was made available by the Joint Steering Committee in December 2005 [http://www.collectionscanada.ca/jsc/rdadraftpt1.html](http://www.collectionscanada.ca/jsc/rdadraftpt1.html) together with public announcements and invitations to comment. Chapter 3 was added for public viewing in January 2006.

Die Deutsche Bibliothek welcomes this opportunity and wishes to express its thanks for sharing the draft of Part I publicly worldwide. The expert groups of the Committee for Library Standards were invited to participate in commenting the draft of RDA Part I. They, too, appreciate JSC's openness to receive and consider comments from non-JSC constituencies.

An expert group for old and rare print materials of the “Gemeinsamer Bibliotheksverbund der Länder Bremen, Hamburg, Mecklenburg-Vorpommern, Niedersachsen, Sachsen-Anhalt, Schles-Holstein, Thüringen und der Stiftung Preußischer Kulturbesitz” (GBV) in Göttingen, one of the German library networks, contributed comments especially on these materials. This group suggests that either rules for old and rare print materials are included in Part I or that the ISBD(A) is declared as the appropriate rules for this material.

Redrafting AACR3 Part I to RDA Part I after analyzing comments on the first draft has really been a huge task which we acknowledge. In spite of all the questions and comments submitted herewith, we ask you to regard them not as a negative criticism, but as an attempt to contribute to further improvements and to excuse us if our use of language does not show our intent clearly. Thank you in advance for considering our comments and questions. Please let us know if you need further clarification.

**General comments:**

The involvement of further communities beyond libraries in the application of RDA is welcomed. The intention to use a generally comprehensible language beyond librarian's language is appreciated. It is helpful to give definitions for terms when they first appear. Will these definitions appear in the glossary, too? A definition of “alternative title”, e.g., is missing.

Structure, form, and language used in Part I are regarded as clear and understandable.
General introduction

0.1.0 Purpose and scope

We would like to see the possibilities of sharing and exchanging whole data records mentioned in an introduction or general part. Library networks are an important factor which we suggest to mention. The option of using scanned, copied or downloaded information which is given in a later part (1.6) should also be part of an introduction or general chapter.

Description and presentation have been separated in the draft. We approve of this separation.

0.1.1 Relationship to other standards for resource description

Only ISBD(G) is mentioned. It should be monitored that there are no contradictions between RDA and the consolidated ISBD which is going to combine the ISBDs into one.

0.1.2 Functional objectives and principles of resource description

Data recorded for description are said to enable identification and selection. DDB wonders why “find” is missing (some expert group members involved in commenting thought that identification plus selection equals find), as descriptive data may aid to find a resource. Will “find” be mentioned only in parts dealing with access points? Will for instance the title proper be addressed in part II, too? Will “collocation search” be mentioned in the following RDA draft parts?

We also would like to ask whether the user tasks “identify” and “select” aim, too, at identification and selection in machine-to-machine processes within a catalog or between catalog systems. If yes, optional deviations – at least regarding the core elements – should be abandoned, as far as possible. (We are – of course - not opposed to introduce controlled vocabulary instead of free text in all cases in which it is necessary for access, citation or representation.) The principles in 0.1.2. should then reflect, too, the requirements of machine-to-machine processes. We would appreciate an additional principle “interoperability” or “interchangeability”.

The objectives and principles are centered on library materials. We suggest that „relationships“ should cover not only bibliographic, but textual and semantic relationships as well.

“Accuracy” is mentioned as a goal for descriptive data. “Descriptive data should furnish supplementary information to correct or clarify ambiguous, unintelligible, or misleading representations made by the resource itself”. This will not always be in harmony with “representation” and its goal that descriptive data should reflect the resource’s representation of itself. When “corrected” descriptive data are asked for, we would prefer to have them as a means of enhancing access or citation in the parts of RDA dealing with access points and to give the descriptive data “as they are” as a part of a “pure” bibliographic description. We think that this side of accuracy is important, too.

0.1.4 Structure of Part I

Chapters 2-6 are explained to reflect attributes and relationships associated with the four primary entities defined in FRBR, work, expression, manifestation, and item. The relation of RDA data elements to the FRBR terms is not as clear as intended.

0.1.6 Mandatory Elements

We appreciate very much the definition of a mandatory element set (1.4) as a core set which can be added to by further optional elements. We suppose that Part II and Part III will contain their own core sets.
DDB suggests to supply - additionally to the table of mandatory elements for Part I – an appendix or web feature with all core sets (Parts I-III) and a table of all the allowed elements, thus defining the element set as a whole.

When discussing the Part I draft, it was often said, “this should be rather optional than mandatory”, and later it was recognized that the rule applied to an element that is NOT part of the mandatory element set. Therefore we suggest to hallmark the rules for the mandatory elements.

0.1.7 Options

It is important for future RDA users to know that optional rules call for policies and guidelines on the application of options. For the sake of data exchange and union catalogues, we prefer shared policies and guidelines (for those who wish to share data). The alternatives given in the draft are understandable as they may apply to different communities, yet they are a problem for union catalogues or networks.

0.1.8 Language preferences

We welcome this clarification for application within a non-English language context.

Part I – Resource Description

1.1.1 Resource

The first bullet point explains that „resource“ refers to the „entity“ which is to be described. In FRBR the term entity is used to represent the key objects of interest to users including all bibliographic entities, agents and entities which are used as subjects. We felt that the entity “manifestation” is meant when “resource” is used in the following text. More generally, we would like to ask, what is being described – manifestations (as librarians usually did), but not works or expressions (these rather being a topic for authority control)? Or is resource description meant for all FRBR entities?

Referring to 1.4, the mandatory set of elements for description is introduced reflecting attributes of the elements work, expression, and manifestation.

1.1.2 Mode of issuance. 1.1.3 Intended termination.

Resources are categorized here in two manners, mode of issuance and intended termination.

The terms used may overlap in content, but vary from the viewpoint. E.g., which term will be used in the following rules for a multipart monograph: “Multipart monograph” (if the mode of issuance does not matter for the rules), “Resource issued in two or more parts simultaneously” or “Resource issued in successive parts”?

“Resource issued in successive parts” may as well apply to a resource intended to be completed within a finite number of parts as to a resource with no predetermined conclusion. This might cause difficulties in understanding to what type the rules apply.

The term “continuing resource” is not used any longer although it is a quite familiar term used also in ISBD. The RDA definition of serial, e.g., does not include series any more and thus differs from the ISBD(CR) definition of serial. We note differences in RDA and ISBD terminology and do not approve to use different sets of terminology in RDA and ISBD.

1.2 Type of description

Mentioning three possible ways of description – comprehensive, analytical, multilevel – and describing their possible use leaves a choice very open, which is not fortunate for data exchange, and is certainly a source for rule interpretations.
DDB would welcome more detailed stipulations on “best practice” or common use to further interchangeability. As FRBR is an entity-relationship model, we wonder if a “best practice” how to give the relations might help to improve data exchange.

Concerning the cataloguing of multipart items, there is at present a strong emphasis in Germany and Austria to keep the practice of multilevel description in two levels. For multipart publications, especially if the parts (volumes) have specific titles, German libraries use a two-level hierarchic construction, consisting of:
- one record for the work as a whole [the main record]; this would correspond to the AACR record for the multipart item
- one record each for every volume [the subordinate records]; in AACR/MARC this is mostly represented only in a 505 contents note.
Doing so, all titles are in title fields, which means every title is treated in the same way.

In 1.2.1, i) we suggest to add as an example a single-volume monograph.

1.4 Mandatory elements of description

A core set (mandatory elements) of description is given here. We assume that there will be a core set for Part II and another core set for authority data in Part III, Access point control. Will subject access points be added to this part, too?
The list is introduced as a reflection of attributes of the entities work, expression, and manifestation. We understand that the core set does not include elements which are mandatory in every case, but mandatory elements if applicable. Some other mandatory if applicable elements are missing: Why are only elements of cartographic content (scale, coordinates) added, but not elements of musical content (e.g. key for music), picture or film?
Will elements of chapter 3 be added? While form (type?) of carrier is included, media category is lacking in the core set though it is an important selection criteria. What about item-specific informations, e.g. access restrictions?
In which part of the rules will administrative metadata be described, e.g. dates of the bibliographic record, agency identifier, type of rules etc.?

Concerning the option relating to the statement of responsibility, please see 2.4.0.3.

1.5 Language and script of the description

The original script is given clear preference, with UNICODE ante portas. When this is not possible, the option allows transliterated forms. We appreciate this new approach to record elements in the language and script in which they appear on the sources from which they are taken. Nevertheless, we suggest to allow transliterated forms not only if it “cannot be recorded in the script …”, but on a more equal footing if considered important.
We assume that transliterated access points will be covered in later draft parts of RDA as we think that access points should reflect, too, language and script of the user communities of the cataloguing agencies. We would welcome more clarity concerning transliterations and their access.

1.6 Transcription

We welcome the second option to give elements of the description derived from a digital source of information using scanning, copying, or downloading as they appear without modification. This could be an option for all information sources. As copy cataloguing nowadays is a very often used option we think there should be some guidance how and in which cases the “master” from which the copy is taken should be referred to. What about metadata established separately from the resource?

Nevertheless, we note that 1.6 Transcription does also cover questions of orthography. If German orthography rules ask, e.g., for hyphenations in compound words or capitalizations of letters, should the bibliographic description give the words “as they are” and should the correct(ed) form be given as an access point?
The transcription of formulas is not yet covered.
1.6.1.1 Capitalization of titles

In general, we are in favour of recording titles as they are found. Usually, capitalization is unimportant for indexing and retrieval.

1.6.2 Numerals and numbers expressed as words

The use of controlled numbering introduces controlled vocabulary. Numerals should be recorded in the form as they are found.

1.6.2.1 Roman numerals

In our opinion, it is not necessary to give roman numeral paging in lowercase. We are in favour of recording numerals in the form as they are found.

1.6.2.5 Ordinal numerals

We are in favour of recording ordinal numerals in the form as they are found.

1.6.3 Accents and other diacritical marks

Accents and diacritical marks should not be added when capitalization is changed to lower case letters.

1.6.5 Spacing of initials and acronyms

What is the intention of omitting any internal spaces in letters or initials with full stops between them? We suspect that filing rules slip in here.

1.6.6 Letters or words intended to be read more than once

We agree to give letters or words only once when they appear on the source of information only once but are intended to be read more than once. The first or prominent reading might be used as an access form or a part of a citation title.

1.6.7 Abbreviations

We suggest to abolish or at least to reduce the use of abbreviations in bibliographic records, unless they appear in the source of information itself.

1.6.8 Inaccuracies

We suggest to consider corrected inaccuracies for further access points. If corrected dates (e.g. a correct date of publication) are only given in notes, they are not usable for sorting or display.

Further suggestions for additions to 1.6

The expert group for old and rare print materials of the “Gemeinsamer Bibliotheksverbund” in Göttingen suggests to add 1.6.9, 1.6.10 and 1.6.11:
**Suggestion: 1.6.9 Typographical variants in early printed resources**

“For the transcription of mutually printed I or J, i or j, U or V, u or v, and VV or vv representing W or w, consult ISBD(A), 0.8.”

**Suggestion: 1.6.10 Ligatures and abbreviations in early printed resources**

“When ligatures and abbreviations in continuance of the manuscript tradition are found in early printed resources, leave them as they stand or expand them wherever possible. Indicate any such expansion by enclosure in brackets or by giving a note. A final larger capital I in Latin words is a ligature representing ii or ij. Expand it as i[i] or leave it as it stands. Additionally consult ISBD(A) 0.6 and 0.7.6 for the transcription of ligatures and abbreviations.”

**Suggestion: 1.6.11 Further questions of recording early printed resources**

“Consult ISBD(A) with regard to virgels, transcription of line ends, etc.”

### 1.7 Formulation of notes

Will the contents of notes be retrievable and covered in the access parts of RDA?

### 1.8 Descriptive elements used as access points

We welcome the possibility to generate an access point directly from a descriptive element. DDB assumes that a list of access points in the following draft parts encompasses the descriptive elements in Part I. We look forward how the forthcoming part of RDA dealing with access points relates to 1.8.

### 2.1.1 Comprehensive description

#### 2.1.1.1 Resource issued in successive parts

Although the stipulation to use the first or earliest issue or part as basis for the description is ISBD like, we note that the German Serials Union Catalogue, ZDB, uses the newest or last issue or part for serials for good reasons. The current information is important for the user, and supports accession and accounting systems.

We suggest to give either an option in the rules to base the description for serials on the newest or last issue or to provide the possibility to make current information, e.g. on publishers, titles, etc. (important access points) searchable.

### 2.2 Sources of information

Metadata from third parties as a source of information are missing in 2.2.

#### 2.2.1 Preferred source of information

We object to installing electronic publications in every case. This should only be done when necessary.

#### 2.2.4 Information taken from sources outside the resource itself

Will this stipulation apply to data received? We are not in favor of bracketing information that is supplied by automatic means (e.g., data which are supplied by others).
We discussed the future of square bracketed information and concluded that in the long run, the value of the square brackets will vanish, especially as catalogue enrichment is performed and more and more information is received and included via automated means or originates from communities that do not follow the bracketing stipulations.

2.3 Title

2.3.0.2 Sources of information

b) prescribes to take other title information from the same source as the title proper. According to 2.2.1.1, the title page (or title page image) is the preferred source of information for a resource comprising multiple pages. Together, these stipulations prevent to take other title information from another source, and we wonder why.

Serial cataloguers suggested to give more details which page (cover or inner title page) should be used as the prescribed source of information.

2.3.0.3 Transcription

We suggest to add an example for early printed resources.

2.3.0.4. Names of persons and corporate bodies

In case of doubt whether a corporate body's name is part of the title we would prefer to verify this only in the main sources of information.

2.3.0.5 Introductory words, etc.

The omission of introductory words is an artificial change. In order to fulfill the principle of accuracy and representation (0.1.2), DDB prefers to give the title as it is. This would be compatible to scanning processes. Other forms should serve as additional access points.

“Do not transcribe words that serve as an introduction …” contradicts ISBD(A) 1.1.4. The experts on old and rare prints of the GBV note the following: “Information pertaining to the title and appearing on the title page before the title by which the work is commonly identified is included without inversion in the title proper in the description even when the typography indicates the subsidiary nature of such information.”

2.3.0.7 Titles of parts, sections, and supplements

We note that CONSER rules and LCRI differ in the handling of section titles from the AACR2 and RDA stipulations. It seems indeed preferable not to limit the primary source of information to the main title page.

2.3.1.5 Facsimiles and reproductions

Are digitizations, which are not mentioned here explicitly, regarded as reproductions?

2.3.1.8 Other elements recorded as part of the title proper

b) Scale

One of the examples given includes a comma in the second part of the statement of scale. Is the scale given “as it is”? Or is the form standardized (to comma or space)?
2.3.1.12 Major and minor changes

As the rules apply to the title proper, we assume that other major and minor changes, e.g. edition changes, will be covered in the following draft part of RDA dealing with relationships.

Bullet iii) A change in a corporate body name given anywhere in the title if it is a different corporate body: Aren’t it the rules in Part III which decide whether a predecessor or successor has to be regarded as being a different corporate body?

2.3.2.4 Type of composition, medium of performance, key, etc.

Does this rule only apply to musical resources or does “etc.” refer to other materials?

2.3.3.4 Supplying other title information

As “other title information” is none of the core elements mentioned in 1.4, we understand that this stipulation is an option although this is not stated explicitly.

2.4 Statement of responsibility

2.4.0.3 Recording statements of responsibility

DDB welcomes the option to provide a controlled access point for the responsible person, family, or corporate body in lieu of recording a statement of responsibility as a descriptive element.

Some expert group members expressed their preference to record the statement of responsibility in order to enable “proof” of the form of name used in the resource described.

The two bullets differentiate between entities with a major role (recorded in the statement of responsibility) and entities with special roles (recorded in notes). We would like to ask for the background of this differentiation. Is it really useful still? It might be easier to abandon it.

2.4.0.5 Statement naming two or more persons, etc.

The expert group for old and rare print materials of the “Gemeinsamer Bibliotheksverbund” in Göttingen suggests not to make use of the option to omit all but the first of each group for early printed resources, but to refer to ISBD(A), 1.5.4.3 (“When the names of several persons or corporate bodies are represented in a single statement of responsibility …, preferably all the names are transcribed. …”

2.4.0.7 Titles of nobility, address, honour, etc.

In DDB opinion, the omissions are not necessary. Include titles etc. in the bibliographic description as they are given. This would make automatic processes easier. It is a task of the RDA part for authority control to stipulate if titles etc. are part of the controlled form of a name or not.

2.4.1 Parallel statement of responsibility

As other forms of names are part of an authority record, we prefer this rule to be an optional rule.

2.4.3.4 Performers of music
We would like to ask when and in which detailedness the notes will be given. Are performers of music given when mentioned in the resource itself?

2.4.3.8 Variant forms of names
As variant forms of names are part of an authority record, we prefer this rule to be an optional rule.

2.5 Edition
2.5.0.1. Definition / 2.5.1.1 Definition
2.5.0.2 Sources of information / 2.5.1.2 Sources of information
We do not understand the differentiation between “edition information” and “edition statement”. Except for “information” and “statement”, 2.5.0.2 and 2.5.1.2 are identical.

2.5.1.3 Recording edition statements
The expert group for old and rare print materials of the “Gemeinsamer Bibliotheksverbund” in Göttingen suggests to add an example for an early printed resource.

2.5.2.3 Recording statements of responsibility relating to the edition
The expert group for old and rare print materials of the “Gemeinsamer Bibliotheksverbund” in Göttingen suggests to add an example for an early printed resource.

2.6 Numbering
2.6 calls for the transcription of numbering as it appears on the source of information. We note that controlled numbering data are important, too. They provide valuable access points for automatic processes and retrieval and are used in the German Serials Union Catalogue, ZDB. We suggest to introduce an option for controlled numbering data.

2.6.0.1 Definition
Why is numbering only mentioned in regard to serials? It might as well apply to series and monographic publications issued in a finite number of parts.

2.6.2 Chronological designation
A combination of numbering and year covered might be added.

2.6.6 Alternative numbering systems
The two lines of the example belong to one example. We suggest to record the example in one line, maybe with an explanation (example follows ISBD specifications for presentation).

2.7 Publisher, distributor, etc.
2.7.0.1 Definition
A differentiation is not always possible in early printed works.
2.7.0.4 Statement of function

To record phrases (other than phrases for solely publishing which are omitted) may add to a
description “as it is”, but will be in conflict with the need to sort the names (unless publisher, distributor,
etc. will be a topic for authority control in forthcoming parts).

How are resources treated that are “published on demand”?

2.7.0.5 More than one publisher, distributor, etc.

The second bullet seems to call for recording a distributor or a manufacturer even if a publisher is at
hand. Does the second bullet call for recording a publisher plus a distributor plus a manufacturer if
there are these three different functions? This would have an impact on 2.7.0.7 (Change in name of
publisher, distributor, etc.)

2.7.1.3 (No publisher identified) calls for recording the name of the distributor if no publisher is named
within the resource itself, but does not cover publisher and manufacturer or publisher and distributor
available.

“Publisher, distributor, etc.” is one of the mandatory elements given in the core set (1.4). We suggest
to treat “distributor, etc.” as optional, if a publisher is at hand.

2.7.1.2 Recording names of publishers

The stipulation refers to the basic instructions in 2.7.0. We would like to know if legal forms like “Co.”
or “GmbH” have to be recorded. The examples in 2.7.1.2 are examples without legal forms. 2.7.0.3
(Transcription) calls for “the form in which it appears on the source of information”.

2.7.1.3 No publisher identified

Second bullet: Instead of “s.n.” “publisher unknown” is used. Other language communities will apply
their language. This might be easier to understand for local users which we appreciate.

Nevertheless, DDB wonders if the latin abbreviations which are used in ISBD do not serve as an
“international” language. Instead of “publisher unknown”, a simple “-” might signal the fact that there is
no publisher known.

Third bullet: Are dissertations (4.18) still seen as an unpublished resource?

2.7.3 Name of manufacturer

Is “published on demand” classified as a publisher or as a manufacturer?

2.8.3 Place of manufacture / 2.8.4 Place of production
2.8.3.1 Definition / 2.8.4.1 Definition

We do not understand the differentiation between place of manufacture and place of production.

2.9 Date of publication, distribution, etc.

There are further dates that are important, e.g. “Date issued”, “date modified”, which are not covered
yet.

Are dissertations still regarded as an unpublished resource? What is regarded as the date of
publication for a dissertation?
2.9.1.3 Date of publication not identified in the resource

Fourth bullet: If a resource is in an unpublished form, there is nothing recorded in the date of publication element. A reference to 2.9.5 is made. Are dissertations (4.18) still regarded as unpublished? Which year is given then, production date (2.9.5) if a copy shop date is available?

2.10 Series

Is our understanding correct that this paragraph refers to the series area (as in ISBD), but not to a comprehensive description of a series?

2.10.2.3 Recording parallel titles of series

We prefer this rule as an optional rule if a series receives a data record of its own.

2.10.5.3 Recording the ISSN of a series

It should be possible to record ISSN even if they do not appear within the resource.

2.12 Resource identifier

Persistent identifiers like DOI, URN are missing. ISMN and other standard identifier should be at least added in the examples, and an example for a thirteen-digit ISBN is suggested here.

Suggestion to add: 2.12.2.4

We suggest to add "fingerprint" for early printed resources and for electronic resources.

The expert group for old and rare print materials of the “Gemeinsamer Bibliotheksverbund” in Göttingen suggests the following definition for fingerprint for early printed resources:

"The fingerprint is a group of characters derived from an early printed resource with the object of identifying the manifestation uniquely. The fingerprint system has been considered as a substitute for the standard number for older publications. The fingerprint consists of a number of characters drawn from a number of uniform places in the text, followed by a number indicating the source of one or more of the characters, the date as it appears on the source of information, a statement whether the year is printed in roman or arabic numerals or in another form, and the number of the volume, if applicable."

3.0 Purpose and Scope

There is nothing said about the scope regarding the different genres like incunable, manuscript up to born digital resources on the internet. Is it intendent that chapter 3 tries to serve all these different publication types?

Are there plans to consider data for long-term preservation like important information about formats and system environments, about the technical history of the file, the creator software and the viewer software etc.?

3.1.3 Facsimiles and reproductions

Does "reproduction" also cover digitized publications?
3.1.5 Remote access digital resources

The regulations concerning the technical description of remote access digital resources are too short and not very differentiated. We see a problem, because as a cultural heritage organization we have to deal with lots of electronic publications and the task to guarantee long-term access and preservation.

3.2 Media category and 3.3 Type of carrier

These chapters are not yet included, and we look forward to their suggestions for successors of general and specific material designations.

The following chapters imply that “media category” replaces “general material designation” and “type of carrier” replaces “specific material designation”.

3.4.1.17 Early printed resources

Is there a clear chronological definition for that sort of publication type? We suggest to give the definition of ISBD(A), 0.1.1: “Older monographic publications are chiefly those produced prior to the introduction of machine printing in the nineteenth century and include those published for limited distribution or for sale on demand.”

3.5 Dimensions

There seem to be very much regulations in this chapter.

3.5.0.3 Recording dimensions / 3.5.0.4 Measurements

We ask you to introduce the metric measure “cm” as an alternative to “inch”.

3.6.13.3 Describing other technical details

Does “printed on acid-free paper” fall under this rule?

3.8.0.1 Definition

The wording of the definition uses the wording of the terms that are defined (“a rose is a rose”).

3.8.0.3 Recording digital representation of graphic content

We note that “if … readily available” precedes the detailed possible information.

3.9.0.4 System requirements for a digital resource

The stipulations call for structured system requirements. We suggest to add an option that allows to give the information in a non-structured form.

We would like to recommend to include some more new examples.

3.10 Mode of access

This chapter does not cover URLs yet. URLs might as well apply to chapter 6, item-specific information.
4 Content Description

How far are 4.2 Type and form of content (to be added) and 4.3 Nature and scope of content related to 3.2 media category (to be added)?

Type and form of content (4.2), language, script, symbol system (4.4), intended audience (4.5) should be recorded in a controlled form, e.g. in encoded form as they are used as access points.

The options to link to content descriptions outside of the resource and to use scanned content descriptions, content lists and abstracts etc. (catalogue enrichment) should be mentioned.

What about structural metadata describing the connection between the content structure and the file structure of the resource? Will this be part of 4.7 Contents list?

4.10 Related Content

Isn’t it related resources, i.e. resources related by related content? The relationships should be represented by controlled access points representing the related resource.

When mentioning absorptions and translations separately, why not other expressions, too, e.g. from written text to sound?

We miss relationships to abstracts, reviews, comments etc. outside the resource (catalogue enrichment).

4.10.0.1 Definition

The wording of the definition uses the wording of the terms that are defined (“related content is content related …”).

4.18 Dissertations

“Dissertation” is a content type, the dissertation information is a very important information. We suggest to include it in the core set (1.4)

Isn’t a dissertation information in the light of FRBR even a special kind of relationship /statement of responsibility?

In early printed dissertations often a praeses and a respondent appear as the authors. Both names and the words indicative of their function are treated as part of a single statement of responsibility unless linguistically linked to the title proper or to other title information.

4.18.0.3 Recording dissertation information

Bullets 2-4 belong to 4.10 Related content, too.
5. **Information on terms of availability, etc.**

Is this the place for licensing informations?

Chapter 5 does not seem to meet the requirements of rights management for digital resources.

5.2.0.3 **Recording information on terms of availability**

We suggest to add examples with informations on licensing and open access for online resources.

5.3 **Contact information**

Aren’t contact informations for web resources and for archival resources item-specific informations, too?

6. **Item-specific information**

The chapter includes topics of bibliographic description and of holdings information. If a data record is used in a union catalogue by several institutions, item-specific information may vary locally and rather belong to a holdings information than to the bibliographic description.

What about preservation metadata?

Chapter 6 does not seem to meet the requirements of rights management for digital resources. This chapter does not cover URLs yet. URLs might as well apply to chapter 3, technical description (3.10 refers to “mode of access”).