TO: Joint Steering Committee for Revision of AACR
FROM: Hugh Taylor, CILIP representative

CILIP’s response is in three parts: the first a section of general comments; the second a section of comments on the text of specific instructions (given in numeric order); the third a series of comments relating directly to examples, a copy of which will also be forwarded to the Examples Group. CILIP has not attempted to link its comments explicitly to the main themes of consistency, clarity and specificity.

I. General comments

The “bigger picture”. It is inevitable that, within CILIP as elsewhere, much of the review of the draft of Part I has been carried out by those with significant cataloguing expertise and with familiar with AACR2 and other tools and concepts employed in the “traditional” cataloguing community. Quite frankly, a lot of the argument and disagreement has been centred on areas which have little impact on the basic functions of the catalogue. Some of that discussion will be reflected in the comments elsewhere in this response. What is harder to bring out, because our own representation is designed to exploit those specialist talents, is the “bigger picture”. With increasing amounts of metadata being generated by untrained, low-status personnel, managers will not adopt RDA if they can't get quick results at low cost. We can wring our hands, circle the wagons, and generally mix metaphors until the cow comes home, but it won't make any difference to this. Even if, as is perfectly possible, there will be a major shift of opinion back to recognising the need for a professional approach (e.g. if there's a major disaster resulting from poor quality metadata), things are never going to go back to the golden age (whenever that was).

Our cataloguing community must respond to a broader range of views, and not confine itself to the thoughts of cataloguing specialists, important and informed as they (i.e. we) are. Whether we like it or not, other packaging formats are now well-established (and there will be more). We can choose competition or collaboration with them; If we compete, we will lose; whereas if we collaborate, we may have a chance of spreading the core gospel before it is too late. Most of the newer formats are becoming aware of the need for content standardisation. If RDA doesn't suit them, they will invent their own (which is almost certainly their natural inclination).

The very act of preparing and publishing Part I first has perhaps led many to concentrate on the minutiae and to place insufficient emphasis on this wider viewpoint, something that might have been brought more sharply into focus had access and rules for access points been our first concern.
This wider viewpoint will not be much in evidence elsewhere in this response, but its absence should be taken as no more than a reflection of where our collective talents tend to lie.

**Optionality.** Some concern has been expressed within CILIP about the degree of optionality encountered in the draft of Part I. This is not just to do with the frequency of use of the term “optionally” to be found, but also of the types of situations in which optionality is offered. The CILIP view is that some cases simply work against standardisation (for example, the various options in something as fundamental as 1.6). At some point the need to reach out to other communities has to be balanced against the need for clear direction to our own community. Would the former be better achieved, for example, by some sort of *RDA lite*, in which the principles and concepts could be conveyed to other communities in a helpful and meaningful way, whilst at the same time having a more rigorous code for our own community that recognises more fully the benefits to users of standardisation.

CILIP would also welcome some variation in terminology. Currently it seems as though “optionally” is used in three quite different situations:

- where the option is to do less than the rule states;
- where the option is to do more (i.e. go into more detail) than the rule states;
- where the option is to do something different from what the rule states

We doubt it helps to use the same term for all three situations (although (a) is probably found only rarely). Type (c) is really an alternative masquerading as an option; perhaps it would be clearer to record it as such?

**Organisation.** The organisation by area of description rather than type of material certainly saves on the need to flip back and forth between different chapters in the printed version of RDA, but other aspects of the organisation extend this need, e.g. Appendix D. It is hard at this early stage to know how the change in organisation will affect cataloguing in the real world. As the success of RDA depends largely on its acceptance by the cataloguing community - which in turn will be affected by its ease of use - it seems that effective testing in real-life cataloguing situations of the organisation of the code will be essential.

**Separation of content and presentation.** A number of comments were submitted to CILIP showing that, despite JSC’s best efforts, the fundamental point about separating rules for the creation of content from those concerned with presentation of that content to the user had not been fully grasped. Placing the rules for “Publisher, Distributor, etc.” (a mandatory element as defined by 1.5) before those for “Place of Publication, Distribution, etc.” had led some correspondents to assume that this was how they should be presented. The same goes for the way rules governing the provision of notes form part of the rules for the element for which the note is required rather than, as with AACR, being gathered together in one block towards the end of a chapter. Whilst this is of only tangential relevance in the immediate context of this response to the Part I draft, it does serve to highlight the degree of commitment to education and training that will be required to support the implementation of RDA.

The one presentation feature that has survived into the body of RDA is the use of square brackets to indicate “information taken from outside the resource itself” (Outcomes of the October 2005 JSC meeting). This seems to be confusing content with metadata about the cataloguing itself. It might be better to encode such “meta-metadata” rather than to embed it in the content. For example, MARC indicators could be used to indicate that the content of a tag is taken from
outside the resource being described, allowing display interfaces to show the content as, say, a different colour or surround it with square brackets, or whatever. RDA continues with previous practice on insisting that the presentation format in such cases must be square brackets, without ever saying why this presentation is, now uniquely, pre-determined.

**FRBR and serials.** It is unclear as yet that the impact on the end user of either FRBR or RDA, or of the two in combination, is likely to be. There is nothing in Part I that would lead to the one record for any serial that many specialists in the area believe users desire. FRBR thinking on serials is not yet fully developed. No concept of the “super-work” (as opposed to the multiple records for the multiple works that arise from major title changes) has permeated the Part 1 draft. CILIP has no substantive proposals to bring to the discussion, but would be interested to know whether these are views that are being reflected amongst their own constituencies’ serials specialists (or users of serials).

**II. Specific comments in rule number order**

1.1.1: CILIP wonders whether the phrase center of focus carries some different meaning from just focus? It might allude, say, to a resource which is part of a larger resource, or which overlaps with another resource. One could say the larger resource is in focus, but that the part is the center of focus. Clarification as to the use of this terminology might be useful; if no difference of meaning is intended, then CILIP would propose substituting focus for center of focus (twice).

1.2.2, final para., option (b): The term “‘In” note” is not used in D.1.3 or elsewhere. 1.1.4 uses the term "analytical description".

1.4: The option to provide a controlled access point in lieu of an otherwise mandatory statement of responsibility lacks anything by way of guidance to the user or restriction on its use. In some situations the relationship of such access points to the resource being described may be far from clear, and yet there’s nothing to guide the cataloguer or to limit the application of this option.

1.6: The options permitting non-prescribed, inconsistent, unstable or unorthodox capitalization, numerals, symbols, spacing etc., whether in accordance with a house style or as a result of harvesting non-RDA data, drive a coach and horses through the guidelines. Of course it is good to break the rules if the balance of advantage in the long term is in favour. But that should not be part of the guidance. Such data should simply be recognized as being “non-RDA” data. There is nothing intrinsically wrong with such data, but it seems paradoxical, and a potential source of confusion, to admit it to inclusion within the instructions.

One of the great strengths of applying content rules is to maximise consistency, and these options potentially destroy it. Whilst CILIP recognises the need to be inclusive, the first option allows an “agency” to create and use in-house guidelines to, say, spell out all numbers (“one”, “nineteen-sixty”, etc.) to produce the opposite of 1.6.2.2.

As one CILIP member put it: What is the point of having rules if we are told that basically we can do whatever we like?
1.6: There’s no equivalent here to the AACR2 1.1B1 rule concerned with changing [ ] to ( ) and … to – which will make it more difficult in future to distinguish between data transcribed from the resource and a cataloguer’s insertions and/or omissions.

1.6.2: CILIP recommends adding an exception to transcribe in a note long statements; this is particularly valuable for early printed resources.

In respect of the option, perhaps the most accurate, consistent and simplest rule might even be always (not optionally) to transcribe the edition statement as it appears on the source. This would assist alignment between RDA and DCRM(B).

CILIP also recommends adding the date in arabic numerals (and in square brackets) to any imprint date transcribed in roman numerals, e.g.

\[\text{MDCCXXXIII [1733]}\]

This can be essential for searching. It also restores alignment with DCRB.

1.6.2.1: CILIP would prefer that, for early printed resources, the option to retain roman numerals in series numbering (and not to substitute arabic numerals, therefore) be provided.

1.6.2.5, fn. 4: Reference needs updating to the 2\(^{nd}\) ed.:

\[\text{London : Bowker-Saur, 1999}\]

1.6.6: It’s necessary here to distinguish more clearly here between transcribing what’s on the item, and what is needed for access. There is also no guarantee that the publishers will continue with any specific graphical layout, and such designs sometimes occur on the cover but not on the title page. Perhaps the rule needs to be strengthened by insisting on an access point for any variant title(s), with a note to explain what’s going on.

1.6.7: The word substitute is misused in the first parenthesis; we recommend using replace instead.

1.6.8: The instructions for dealing with inaccuracies gave rise to extensive debate within CILIP. In particular, the discussion highlighted the tension inherent in much of RDA (and in AACR before it) between transcription (helping to identify a particular manifestation) and access. There were many who preferred something closer to the AACR2 rule, without being able clearly to define what constituted an “error” or how to deal with the implications of interpolating [sic] or whatever in a machine-readable environment. On the other side of the argument were those voices that felt RDA shouldn’t be concerned at all with the mechanical process of creating a catalogue record (including the possibility of transcription errors or typographical errors), but who believed RDA to be concerned with intellectual processes.

Anticipating a consensus that RDA, as now drafted, is the way forward, then CILIP would like to suggest that the rule includes a brief statement of its raison d’etre:

\[\text{In order to enable identification of the work or manifestation, when instructed to transcribe the element as it appears on the source of information, transcribe an inaccuracy or misspelled word as it appears on the source, except where instructed otherwise (see xxx and xx).}\]
When the inaccuracy or misspelling occurs in an access point, provide another access point with the correct data, if known. Otherwise, record the inaccuracy in a note.

1.6.8, first para.: CILIP recognises that RDA is currently “work in progress”, but hopes that it will, in due course, be possible to provide specific rule numbers in place of, or in addition to, the general statement “where instructed otherwise” (as shown in our suggested wording above).

1.7.2: Should it be stated explicitly that RDA expects “quotation marks” to be double not single (at least, that appears to be the case)? Or perhaps this should be regarded purely as a presentation issue? More generally, some attention needs to be paid to the difference between double and single quotes (noting, in passing, the potential for confusion between the apostrophe and single quote).

2.2.1.1: For early printed resources, the order of precedence proposed when a title page is lacking is not that most often used by specialists working with such material. The colophon may well be the best source available. What appears on the cover of a book may have only the authority of the binder, whereas a caption title will have that of a publisher. However, allowing variation in the choice of the preferred source of information could lead to divergence in approach between individuals, institutions, and communities.

2.2.1.1: Somewhere (here? glossary?) it needs to be made clear whether left- and right-hand pages of a printed text (or reproduction thereof) – i.e. the complete opening - can together be regarded as a (single) “title page” for the purposes of this rule.

2.2.2: It isn’t entirely clear what ‘first occurring’ means in this rule; it could refer to the resource or the rules, with quite different consequences. The first sentence might be a candidate for rewriting.

2.2.2 a (iv): Is there some rationale for the particular languages that are individually listed and/or for the order in which they appear?

2.2.4: CILIP anticipates problems arising from the exception to omit square brackets if the resource is one of the types listed. Some photographs bear an explicit date. Others don't. So if the record has a date, was that date stated in the work, or is it just the cataloguer's opinion? Again, some published prints bear a publisher's name. Others don't. If the work is ordered from a closed stack to check, say, the spelling of the publisher's name, how pleased will the patron be to find no publisher's name given?

If the used knows the title is supplied, because a note or label says so, then clearly the brackets are otiose. But there's no equivalent for edition, numbering, publisher, place, and date. It is vital to be able to see what has been added by the cataloguer and what appears on the resource itself.

One problem with the exception may simply be the inclusion of “a photograph” in the parenthetical list of examples. But conceptually, there has to be a problem with a division of this sort, however carefully the division is made. The alternative is to omit square brackets altogether, and to require notes to explain clearly and unambiguously what the cataloguer has provided. This may go beyond what JSC is willing to consider, but the alternative carries risks which need to be taken into account.
2.3.0.2 (e), 2.3.2.2: Presumably RDA is written to cover the case of a parallel title printed at the top of each page but omitted from the title-page of a multi-paged textual work, or where the title and parallel titles appear on the cover of a work with no title page, or one with two title pages in each of two languages. The rule should stand if, generally, it is important to record parallel titles as part of the title attribute. If it is not that important, then why not restrict taking the parallel title from the source of information for the title proper? If it is not on the source of information of the title proper might it be confusing to record it as part of the title, and would it be better given an access point and a note as a variant title?

2.3.5.1: This is clear, but extremely condensed. Whilst condensation in a definition is generally a virtue, it would be helpful to make some relation of these definitions to why earlier titles apply only to integrating resources and later titles only to resources issued in successive parts. Perhaps all that is required here is a reference to 2.1.1.1 in the definition of "later title" and to 2.1.1.2 in the definition of "earlier title", e.g.

   Earlier titles apply in describing integrating resources because the description is based on current iteration of a resource (see 2.1.1.2)

   Later titles apply in describing resources issued in successive parts because the description is based on the first/earliest issue/part (see 2.1.1.1)

It is unfortunate that because of the way the rules have to be structured the definition for integrating resources must come first, when it would be more natural (for most user) for the definition of titles applying to integrating resources to come second.

2.3.8.4, 2nd para.: If the corrected form of the title is considered important for access, CILIP does not see how providing an access point can be optional. Provision of an access point need not preclude a note. It would be better to treat the identification and access requirements separately. So, if the corrected title is significant for access, then an access point should be required (but the note could be optional); if significant for identification, then a note should be required (but the access point could be optional).

2.4.0.5: In the option to truncate a single statement of responsibility that names more than three persons, etc., CILIP would like to suggest either retaining the instruction from AACR2 1.1F5 to add et. al. in square brackets, or (our preferred choice) summarising the extent of the omission in the language of the cataloguing agency, e.g.:

   ... [and 3 others]

   This is especially important for early printed books to note the nature of the omission, as in DCRB the mark of omission without [et al.] is used in statements of responsibility to indicate omission of academic or clerical affiliations, academic degrees, etc. following the author's name on the title page.

2.4.0.7: CILIP also recommends an additional provision for early printed books.

2.4.3.3 (referred to at 2.4.0.3): This rule is effectively a reversal of AACR2 12.1F3, and is likely to be most easily applied retrospectively. Dealing with live serials requires a prospective judgement to be made – one which obviously may well turn out to be wrong. The rule risks appearing as though it only applies to serials you may retrospectively examine once they have ceased. While the problem isn't frequently encountered, the variance in practice is plain to see (e.g. Millers' price guides to antiques).
2.5.1.4: CILIP suggests that the text of this rule is, in fact, part of the definition of what constitutes an “edition” and should be included as part of 2.5.1.1. If that suggestion proves unacceptable to JSC, CILIP recommends that the identification of what constitutes an “edition” should precede any instruction on how to record one. It seems illogical to be told how to record an edition statement before one has determined that is indeed what one is dealing with.

2.5.1.4: If RDA is going to have a useful rule for digital resources at 2.5.1.4 CILIP believes it needs to take account of ISBD(ER) in this area. The word “version” or whatever may not indicate an edition change at all. This rule surely relates closely to rule 1.3 (Changes requiring a new description). Essentially, if 1.3 doesn’t tackle this problem of whether to create a new record because of the presence of a potentially misleading term like “new version” and 2.5.1.4 bungles it, then where is it going to be tackled? As far as e-resources go, rules 1.3 and 2.5.1.4 seem to be of limited help.

2.5.2.3, final para.: This is expressed rather oddly and might confuse the reader. Suggested rewording

... record all statements of responsibility in the Title and statement of responsibility area

2.6.5: Might it be clearer to read and understand if this rule were split into 2.6.5.1 and 2.6.5.2, dealing with numbering and chronology separately? Or perhaps it’s simply that the Examples Group needs to find a less confusing way of presenting the examples that illustrate the rule (in which case it’s a presentation issue only).

2.7.0.5: Examples are given of imprints which name printer and publisher in a single statement (e.g. "Printed for the CLA by the Morriss Print. Co."). However, it would be helpful either here or at 2.7.0.3 to have guidance for what to do in cases where two bodies are named but the separate functions are less explicit, e.g. "Oxford University Press for the Bibliographic Society". One solution would be to generalise the option at the end of this rule by removing the need for multiple names to relate to different functions

Optionally, if the names of publishers, distributors, etc., appear on the source of information in the form of a single statement, record the statement as it appears.

2.7.1.3: The provision of [Publisher unknown] (along with the equivalent provision for places and dates at 2.8.1.3 and 2.9.1.3) was another source of significant debate within CILIP. On one side were those who saw no problem – either for themselves or users of RDA data – in the continued use of AACR2’s Latin abbreviations. On the other were those who recognised that these abbreviations are little known outside specialist communities. Semantic difficulties, some of them so slight as to be virtually devoid of measurable substance, were found with all of the alternative texts proposed. Readers of the RDA-L postings on this topic will have some sense of the issues discussed. CILIP feels that the use of “unknown” in this context is not correct and would prefer the rule to require either Publisher not stated or Publisher not given.

2.8.0.3: CILIP suggests adding a sentence making clear that prepositions associated with the place of publication should be included in the transcription of that place. This is, generally, in order to preserve grammatical integrity; also, in the case of early printed books, because inclusion of such prepositions is standard practice and contributes to identification.
2.8.0.4: Once a decision has been made to include the place of publication element in a description, there seems to be no alternative to transcribing as many places as the source gives, no matter how many there are. Should there be?

2.8.0.4: There is already provision made in the first paragraph of this rule that allows layout to determine the order in which places are given. There is an additional, parallel need for a specific place identified as the one from which a particular publication emanated (by virtue of being named as such elsewhere in the resource) to be recorded first, even though this may also not be the first-named place in a list on the source being used for this element.

2.8.1.3: CILIP would prefer to replace the statement Place of publication unknown with either Place not stated or Place not given (cf comment at 2.7.1.3).

2.9.0.4: As this rule is likely to apply only to early printed resources, it would be helpful if RDA and DCRM(B) concurred. The DCRM(B) wording reads:
Chronograms. If the date appears only in the form of a chronogram, give it in arabic numerals enclosed in square brackets and give the chronogram in the note area if desired.

2.9.0.5, last para.: CILIP suggests simplification by dropping the option in this rule and rewording this final section of the rule to say, in effect, “don't give the date if you haven't got it and can't get it but give it (in square brackets) if you can supply it”. It would be so much better (and easier) if everyone did the same here.

2.9.1.1: The definition of “date of publication” assumes that there is only a single date associated with the issuing, publication, or release of a resource. In practice, resources may bear a number of dates which appear to fulfil one or more of those functions. Which of the many dates mentioned is to take precedence over all the others? A simple answer would be to say the latest. Guidance is needed to cover this situation; perhaps it might even be possible to construct a list in order of precedence.

2.9.1.3, 2nd para.: This paragraph has caused much disquiet within CILIP. There is no rule governing the form in which such supplied dates are to be given. And it is not possible to tell here whether the examples are substituting as rules, or whether they are nothing more than examples of ways in which supplied dates might be given. (Since 0.1.9 makes clear that the examples are there to illustrate the application of rules, it is hard to see how they could be intended to be prescriptive.) CILIP notes, too, that this is an area in which – according to 1.5 – any interpolations should be in the language and script of other data in that element (since there is no instruction to the contrary). So, whilst “1970s” might be appropriate if the language of the element is English, it is unclear what the equivalent in some other languages might be. In any case, there is surely an overwhelming need for consistency here.

In terms of how such data is to be used, there is also a strong support for any approach that removes as much non-numeric content as possible to assist machine sorting.

CILIP recommends that the rule be extended to incorporate instructions on the recording of these approximate dates. It does not favour the use of the trailing “s” (e.g. “1800s”) as part of that mechanism. Indeed, there’s an ambiguity in that particular example, in that it could translate as either 1800-1809 or 1800-1899.
Having been unaware of ISO 8601 before reading 5JSC/RDA/Part I/Chair follow-up/2, we believe this approach is worth further investigation.

2.9.1.3, 3rd para.: CILIP would prefer to replace the statement *Date unknown* with either *Date not stated* or *Date not given* (cf comment at 2.7.1.3).

2.9.3.2: Although the use of the abbreviation “c” (copyright) is determined by the relevant Appendix and isn’t specified in this rule at all, CILIP wants to take the opportunity here to state its desire to be rid of it. Many people apparently think it is the abbreviation for “circa” – although here in the UK, where that is quite commonly the case in style manuals and dictionaries, it is usually followed by a full stop – whilst many others simply don’t understand it at all. We do not believe it is sufficiently widely recognised to be acceptable abbreviation for RDA. The reason for mentioning it in the context of 2.9.3.2 is that its removal from the list of authorised abbreviations would inevitably raise the question of how else to indicate a copyright date. CILIP believes there may be no more acceptable alternative than to spell out the complete word “copyright”.

2.12.0.1: It will not always be the case that the resource identifier is uniquely associated with the resource being described. According to 1.1.1, “resource is used in part I (and throughout RDA) to refer to the entity that forms the center of focus for a resource description”. It is not uncommon for a new editions of a book to he published with the same ISBN as the previous edition. The two editions are separate resources in RDA terms, yet for neither of them is it true to say that the ISBN is uniquely associated with that resource. Since the concept of uniqueness doesn’t seem crucial to the provision of resource identifiers, CILIP recommends the removal of the word “uniquely” from this definition.

2.12.1.1: In the case of the ISBN, the requirement to record that number “in the format prescribed by the relevant standard” is ambiguous. All three of the following are legitimate formats:

- 0123456789
- 0 12 345678 9
- 0-12-345678-9

3.4.0.6: The solitary ‘v.’ continues to look very peculiar and be potentially misleading. It appears in a position which would normally be occupied by roman numerals for pagination, and is largely pointless until completed with the addition of a numeral before it.

3.4.1.2: Suggested rewording of the first phrase:

If the resource consists entirely of …

3.4.5.10: There is a reference at 3.4.1.17 directing the user to make a note at 3.4.5.10 if needed to “provide more precise information about pagination, blank leaves, or other aspects of collation”. But the guidance at 3.4.5.10 is specific to signatures, columns/lines and type measurements.

3.5.0.3: Prints and drawings, and other loose-sheet materials, are often measured in centimetres to the nearest tenth of a centimetre. RDA gives this as an option only for maps (see 3.5.3.1). The option should be extended to Graphic resources and to unbound Manuscript resources.

Much ambiguity in describing prints and drawings would be eliminated by incorporating from *Graphic materials* rule 3.D3.1:
precede the dimension by the aspect that has been measured, that is, "image," "image and text," "plate mark," or "sheet."

3.5.1.4: CILIP recommends adding, as an option for early printed resources, an instruction to record both the height of the item and the height of the binding if there is a significant difference between them. Example:

22 cm. bound to 26 cm.

This applies particularly when items of varying heights are bound together in a single volume. The volume height is important for library management purposes; the height of the particular item, if considerably smaller, for bibliographical considerations (e.g. it might make the difference between a small and a large quarto).

3.6.1.3: Whilst it becomes clear to the user later on (see 3.6.13.3 and 3.6.13.4) that further details (e.g. Braille and Moon grades) can be provided in a note, CILIP recommends providing a forward reference at this point.

3.6.2.3: An additional section is required here

**Layout of tactile music scores**

It is very important to be told if the transcription is ‘bar by bar’ or ‘bar over bar’ for example.

3.6.6.1: The draft appears to tie itself in logical knots with its treatment of illustration. 3.6.6.1 defines illustrative matter as being essentially secondary (“matter designed to illustrate the primary content of a resource”), which seems to make nonsense of a resource consisting “wholly … of illustrations” (3.6.6.4). What is the primary content that is being illustrated in this case? A book consisting entirely of images is surely “primarily graphic”, in which case 3.6.6.3 suggests that no illustration statement should be given, whereas the following rule suggests that if a book is considered to be “not the type of resource for which [consisting wholly of illustration] is typical”, the statement “all ill.” *can* be given. The terminology suggests a confusion between images and illustration that it would be well to clarify. CILIP suggests changing the definition to read

**Illustrative matter** is matter designed to demonstrate and/or clarify the primary content of a resource.

4.9.0.3: CILIP would prefer to remove “if considered to be important” from this rule. We cannot see how the provision of an index can ever be anything but important to the user; omitting to mention indexes means the user cannot then distinguish between resources that lack indexes and resources which have them, but which the cataloguer felt not to be “important” for some reason.

4.10.1: An explanatory introductory sentence explaining the context in which the need for such notes might have arisen – referring back to 2.3.1.12 and 2.3.5 and the concepts of major and minor changes – would be helpful, especially (we anticipate) for users of the Web version of RDA.

5.3.0.3: The full address of a publisher, etc., has moved out of the imprint data (AACR2 1.4C7); “contacting” the publisher is presumed to be the function of the information. However, addresses are frequently transcribed in records for early printed resources, in cases where the publisher may have been dead and gone for centuries. The address serves not as a contact address, but as a source of information about the production of the resource, and to distinguish the resource from other resources.
As DCRM(B) points out (4C2), "Addresses and insignificant information in the middle or at the end of the publisher statement may be omitted, if desired, unless the information aids in identifying or dating the publication or is deemed important to the cataloging agency (e.g., for the purpose of capturing book trade data)."

RDA needs to recognize that the provision of a full address is not solely for the purposes of contact.

**6.3:** There seems to be some conflict between RDA’s definition of *provenance* in 6.3.0.1 and the instructions on recording such provenance in 6.3.0.3. What users are being instructed to record is information that by no means fits the definition RDA gives. CILIP recommends either that the title of 6.3 be changed to **Source of acquisition** (and that corresponding changes to the text of 6.3 follow from that), or that this section be broadened to encompass both provenance and immediate source of acquisition. Our preference is for the latter.

In order to provide a genuinely useful provenance note, as opposed to merely showing the last owner before the present one, there may be much more for the cataloguer to do than simply "add the years of ownership to the name of a previous owner".

It is sometimes necessary to state the evidence for the provenance, as well as stating the provenance itself.

Perhaps RDA could incorporate text from the *Provenance* section of DCRM(B), with such changes as are suitable to RDA, combined with trade cataloguing norms?

**D.1.3:** This uses the term “In analytic. This seems an unnecessarily obscure and cumbersome phrase. In any case, "In" is surely part of presentation rather than data. Since the whole of D.1 is headed “ISBD Presentation”, CILIP would prefer the terms *component part* and *host*, as in the IFLA document *Guidelines for the application of the ISBDs to the description of Component Parts*, 2003


(It is better not to say *component/host work* or *component/host item*, as “work” and “item” both have special meanings.)

That IFLA document says that the link term can be *In, On*, or whatever is appropriate. Using *In* in RDA is too restrictive.

### III. Comments related to Examples

**General:** CILIP notes that there have been problems interpreting the application of draft rules through the examples because of the largely presentation-neutral format in which most of the examples appear. Whilst some of this is merely a case of users being presented with something with which they are (at present) unfamiliar, there seems little doubt that understanding in some places was more confusing because of the lack of ISBD punctuation. The recent suggestion (5JSC/RDA/Part I/Chair follow-up/1) that different presentational interfaces might be given,
labelled OPAC presentation, ISBD presentation or even MARC presentation seems, at initial reading, an attractive and helpful way of proceeding.

In addition, we hope that more examples showing how multiple elements can be combined will be provided - for example, multiple names of publisher (2.7.0.5) and places of publication (2.8.0.4).

**General:** CILIP is unclear whether the full stops at end of notes (e.g. 0.1.9) should have been removed or whether they are still seen as serving some purpose. The Examples Group is asked to consider this in the context of presentation of examples.

1.6.2: Rather than two examples of an edition statement, we should prefer to see an example of a date such as

Anno gratiae millesimo quingentesimo septimo die vero decimoctavo Maij

[from DCRM(B) 4D2.3]

1.6.4: We suggest that examples be provided demonstrating how to indicate superscripts in instances where they cannot be reproduced on library management systems; this is relevant to signatures for rare books, but also to edition statements for modern French material (systems that use MARC-8 encoding would be unable to reproduce the French examples given in 1.6.2.5, for example).

1.7.2: We suggest replacing or deleting the Langland example. According to recent editions of the *Oxford companion to English literature, Piers Plowman* is stated unequivocally as being by Langland, not as being "generally considered to be by Langland".

1.7.2: The examples would be better not using smart quotes. They can be a source of corruption in migrated data.

1.7.4: Our assumption is that the first example was intended to be a generic form of the information, with the second showing an ISBD display. However this is by no means entirely clear. Some way of removing potential ambiguity or uncertainty in the presentation and formatting of examples will need to be devised. The Examples Group way wish to consider labelling all examples as to presentational type in order to help users’ understanding of the examples.

2.3.0.4: *Eileen Ford's a more beautiful you in 21 days.* This example, carried over from AACR2, seems problematic with the indefinite lower case article (although it was upper case until 1988). As it is, *A more beautiful you in 21 days* looks like a title which could stand alone (and requires an access point); it is not evident why it should not be: *Eileen Ford's A more beautiful you in 21 days. Hart’s Rules* and *Boise’s Manual of gem cutting* (AACR2 21.12A1) seem already to be in conflict. Perhaps there is supposed to be some distinction here which is not explained.

2.3.1.7b: The ‘not’ in the final example ought to be in the text font.

2.3.1.9: Resource lacking a collective title: RDA gives as examples (following wording on t.p.):

Lord Macaulay's essays and Lays of ancient Rome
Le prince, suivi de L'anti-Machiavel de Frédéric II
The absence of ISBD punctuation is unhelpful for showing the relationship between the two items in the title. This would be a case where retaining ISBD punctuation would benefit the user of RDA, i.e.:

Lord Macaulay's essays; and, Lays of ancient Rome
Le prince. Suivi de L'anti-Machiavel de Frédéric II

2.3.1.9: The last example shouldn’t be enclosed in square brackets, as it belongs to the “exception” at the end of 2.2.4.

2.3.3.3 (last two examples at foot of p. 2-22): Presume the [] lines are notes to the reader and ought to be in the text font.

2.3.4: Apostrophe needs correcting to match the others.

2.4.0.4: In the example of statement of responsibility

by a Lady of Quality

we wonder whether the capitalisation is justified by any rule. The 1949 LC rules included ‘By a lady’ and ‘By a minister of the gospel’; it is unclear that AACR2 or RDA explicitly say anything different.

2.4.0.7: Provision “c) the title is necessary to identify a person”, at least for those dealing with early printed books, need to include an example of the type “Rev. John Smith” with “Rev.” left in as offering a little help.

2.4.0.11: This AACR2 example is confusing, as it can be understood as a descriptive phrase (cf "illustrated with five metal cuts”, typically interpreted as part of a sub-title and specifically instructed to be treated as “other title information” in DCRM(B)) as opposed to the sense of an omitted name implied by the rule, “translated [by John Smith] from the Danish”, or “translated from the Danish [of Sven Jenssen]”. We suggest replacing with the example: “Written by an unknown hand”.

2.4.3.3: Add an example for a blog.

2.5.0.3: The example


retains what appears to be an anomalous capital letter for New, which we believe is contrary to ISBD and to general usage.

2.6.2.3: The substitution of a forward slash in place of a hyphen in the third and fourth examples seems to be unsupported by any rule.

2.7.0.3 & 2.7.4: There are currently no examples provided where clarification of the name as transcribed is considered to be important. One not uncommon situation would be connected with a false place of publication: a false London imprint including a publisher’s/printer’s name that was in fact printed in Edinburgh by Thomas Ruddiman. CILIP’s Rare Books Group can assist with locating a specific example, if help is needed.

2.7.4.3: The examples are inconsistent with each other - one has a colon, the other not.

2.8.0.3: An example given is
Lugduni Batavorum

No examples are given where the source of information uses abbreviations. Suggest add example: Lug. Bat.

2.8.1.2: The examples here seem to conflict with the rules at 2.8.0.3.

2.8.1.3: According to 1.5, interpolations relating to place of publication are to be given in the language and script of other data in this element. Examples for Munich and Spain seem to conflict with this – it may eventually turn out that the rule needs to go back to JSC for review and this should be somewhere that interpolations are supplied in the language of the cataloguing agency, but for now CILIP is happy to pass this on to the Examples Group for more detailed evaluation.

2.8.4.2: The arrangement London-Zagreb-Trieste seems to conflict with 2.8.0.4.

2.8.5.3: Add example of note Actual place of publication from Willems
We should also like an example of possible of a note explaining how an imprint was known to be false, e.g.
  Known from author’s diary to have been printed in ...

2.9.0.3, (c): delete second instance of 4308 [1975].

2.9.1.3: It would be good to have an example with a precise date as permitted under 1.6.2. e.g.
  [2005 February 21]
There should also be such an example in 2.9.0.3 (as an option when the exact date is in the resource).

2.9.5.3: Could do with an example of a BC date; or, depending on the cultural sensitivity of such a concept, of a (less overtly religious) BCE date.
For more on Common Era (CE) notation, see the article in Wikipedia
  http://en.wikipedia.org/wiki/Common_era

2.13.0.3: CILIP puts forward a number of suggestions, as follows:
Delete HR6471 at top of list (it appears lower down)
Add space: GW 9101 (example currently reads: GW9101)
Add example which requires both author and title, e.g.
  Gilson, D. Bibl. of Jane Austen, E13
  Bloomfield, B.C. Philip Larkin (2002), B14
  (Updated edition of an earlier work)
Add example referring to an electronic source, e.g.
  Wing (CD-ROM) D-124
  IISTC (CD-ROM) id00430000
An example to show that the rule could be generalized to apply to serials would be helpful; to show the use of citations for publications indexing and/or abstracting the serial.
There may be scope, more broadly, for further examples giving full citations in a variety of citation formats, and covering all sorts of references (biographical, historical, geographical etc., articles as well as books)

3.4.1.5: "Wanting" is probably a better bibliographical term than “lacking”, but users might even prefer “missing” to either of those.

3.4.1.17: We suggest adding an example which shows more clearly inclusion of pages or leaves (possibly blank) not included in numbered sequences, e.g.


We also suggest including an example along the lines of:

xi, [79] leaves (final leaf blank)

3.4.5.10: RDA gives example of signatures:

\[a-v8, x6\]

The following corrections need to be considered:

- delete comma.
- signatures must appear in superscript ie.

\[a-v8^8, x6\]

Signatures might be lower case, but it is far more common in a single sequence as in the example for them to be upper case. We suggest changing to upper case, as a likelier reflection of the source.

\[A-v8^8 x6\]

The second example is a little puzzling:

Woodcuts on leaves B2b and C5b signed: b.

If these woodcuts are on leaves that are signed, in what way are the woodcuts themselves signed? DCRM(B) has this very example in 7B6(4) – these are notes on statements of responsibility, and so in the example “b” is assumed to be a “b” representing somebody’s name. Also, “b” for verso, although the terminology used by Gaskell, is not normal usage currently in catalogues. In practice catalogue records use the clearer r/recto and v/verso.

3.6.9.3: Example

vellum (A manuscript).

Suggest that this might be amended to read

vellum (A manuscript or, more rarely, a printed book)

although we realise that the convention here is probably stating what the example is: i.e. it doesn’t mean that the example couldn’t be from a printed book.

3.6.13.3: Add hyphen:

hand-coloured.

3.6.13.3. Final example retains ISBD punctuation between notes without indicating that’s what it is.

3.6.13.8: Add examples of resources carrying additional audio description (for visually impaired) and/or subtitles (for hearing impaired).
3.6.13.9: Add examples that give details of DAISY files – these are digital audio files. The user needs to know the structure (or ‘chunking’ – is it by paragraph, page or chapter) and whether the DAISY file has both audio and text elements.

4.3.0.3: Suggest adding example:

Chiefly tables

because if the tables are all figures, this will not appear in the physical description area.

4.7.0.3: The order of the examples does not seem very logical. We would suggest rearranging so that the examples citing a bibliography are grouped together and those beginning "Contents" are "Partial contents" are grouped together.

6.2.1: Example

Leaves I5–6 incorrectly bound between h3 and h4

We suggest a change of case to “H3” and “H4” (see comment for 3.4.5.10)

Example

Imperfect: wanting leaves 12 and 13 (b6 and c1); also the blank last leaf (S8)

We suggest a change of case to “B6” and “C1”. This is because signatures are usually given in capital letters. It is possible to have a sequence of capital letters followed by a sequence of small letters, but in the examples above it looks rather as if inconsistency has crept in.

Example

Inscription on inside of front cover

We suggest changing this to:

Inscription on front paste-down

on the basis that in most cases the inside of the front cover will be a paste-down, and this is a more precise term. However, the point was also raised that RDA may be used for cataloguing early printed books by those who know little about them and that therefore the term “inside front cover” is preferable to “front paste-down”. Would an example of both be sensible, as there are cases where the inside of the front cover is not a paste-down (e.g. modern paperbacks)?

Example

Signed: Alex. Pope

This example is felt to be problematical, on the basis that post-production signatures of names are commonly recorded as “inscriptions” (as opposed to “limited edition of 250 numbered copies signed by the author and artist”). We suggest removing this example.

We suggest adding an example about annotations (a common copy-specific feature), e.g.:

Heavily annotated in 17th-cent. hand

6.3.0.3: None of the examples shows "previous owners and/or custodians", i.e. a genuine chain of provenance, as distinguished from merely showing the last owner before the present one. Here are some examples.

These three come from the Pierpont Morgan catalogue on the web (Corsair):

Johann Anton André; Julius André; Karl Mayer Rothschild; Ludwig II, king of Bavaria; Wittelsbach Trust, Munich; Max Pinette and
Max Mannheim; Charles Scribner's Sons; Mary Flagler Cary; National Orchestral Association. [this is a Mozart score]

George Guy Greville, 4th Earl of Warwick (Lugt 2600); probably his sale, London, Christie's, 20-21 May 1896; Charles Fairfax Murray, London; from whom purchased in 1910 by J. Pierpont Morgan (no mark; see Lugt 1509). [drawing]


They are expert but fairly bald statements of provenance, leaving one to wonder "How do they know that that Mozart score belonged to Ludwig II?". It is sometimes necessary, therefore, to state the evidence for the provenance, as well as stating the provenance itself.

Hence, the current draft of the DCRM(B) says:

Provenance. Make a local note to describe details of an item's provenance if desired. In less detailed descriptions, it is advisable to summarize provenance information, without providing exact transcriptions or descriptions of the evidence. Include the names of former owners or other individuals of interest and approximate dates, whenever possible.

National Library of Scotland copy: inscription of John Morris, 17th-century; stamped as a British Museum Sale Duplicate, 1787

Beinecke Library copy with inscription of Langston Hughes dated 1954

More detailed descriptions of provenance might include such additional features as: exact transcriptions of autographs, inscriptions, bookplates, stamps, shelfmarks, etc.; location of each in the item; approximate dates when known; descriptions of bookplates using standardized terminology; descriptions of anonymous heraldic bookplates according to heraldic blazon; references to published descriptions of the collections of former owners of the item, particularly if the item is cited in the source, etc.

National Library of Scotland copy: "Ioh. Mauritius" (17th-century inscription on t.p.; see Birrell, T.A. Library of John Morris, no. 410); "Museum Britannicum" (ink stamp, in blue, ca. 1760, on t.p. verso); "British Museum Sale Duplicate 1787" (ink stamp, in red, on verso of t.p.)

Sotheby's do it this way, for instance this is from lot 276 in their sale of the stock of H.P.Kraus, New York, 4-5 December 2003 http://search.sothebys.com/jcsp/live/event/EventDetail.jsp?event_id=26371

Provenance: Andreas Rutzkay(?) (17th-century? signature on title) - The Jesuit college of Tyrnau, Hungary (manuscript inscription,
1751) - Christian Strachotinsky von Strachotin (armorial bookplate)

Sometimes the prices are included in the chain of ownership, which is invaluable for some catalogue users. For instance this is lot 8 in Christie's sale of drawings in New York, 24 January 2006: