To: Joint Steering Committee for Revision of AACR
From: Marg Stewart, CCC Representative

CCC has reviewed the draft of RDA, Chapters 6-7 and offers the following comments:

Comments on the three specific issues
Alternative at 6.4.1.2.1c.2 and 6.4.2.2.1c.1 Embedded descriptions of related resources
With library administrators concerned about the costs of cataloguing, CCC is not sure if this is feasible. We also suggest that “using encoding” be defined or at least explained.

6.4 Source/Reproduction and 6.5 Format/Format relationships
CCC does not think that it is desirable to combine these two sections as the two relationships are distinct. The four ways of recording relationships are applicable to each of the different relationships, so unless all the relationships are generalized, 6.4 and 6.5 should remain separate.

Special rules in AACR2 chapter 21
Comments on further integration of the special rules have been embedded in the specific comments below.

Chapter 6
General comments
Although the different conventions allow for greater flexibility, the distinction between the various conventions of recording relationships is not always apparent, e.g., 6.4.1.2.1a.1 vs. 6.4.1.2.1c.1. CCC feels that it is important that the definitions are as clear and the relationships as distinct or mutually exclusive as possible.

Specific comments
6.0.1: Suggest adding an “e.g.” in parentheses examples illustrating related resources. Cf. 4.0.

6.1.4.1.1: To parallel the wording at 6.1.4.1.2, the following rewording is suggested:
If the related work is one for which the name of a person, family, or corporate body is prescribed as the primary access point (see 7.2), construct the access point using that name followed by the title of the work.

6.1.5.0.1: Suggest that a definition of an embedded description be given. Guidance similar to that provided at 6.1.6.0.1 would also be helpful at 6.1.5.0.1.

6.1.6: CCC also expressed some concern with the use of the term “reference” and felt that it could potentially be confusing. CCC suggests replacing “informal references” with “informal notes”, e.g.,

6.1.6 INFORMAL NOTES TO RELATED RESOURCES
6.1.6.0 General guidelines on providing informal notes to related resources
6.1.6.0.1: Although the recording of relationships between resources is an optional element, the two conditions at 6.1.6.0.1 appear restrictive. It should also be possible to make an informal note when a specific relationship is considered important by the agency even when the two conditions do not apply. Or, should this chapter only apply if the intent is to record a formal relationship, the fallback being an informal note only when these two conditions apply? Note that this comment is also applicable to all the “Informal reference [Informal note]” sub-instructions (e.g., 6.2.1.2.1d.1, 6.2.2.2.1d.1, 6.3.1.2.1d.1). Some of the examples at 4.7 do not seem to fulfill either condition. Suggest adding:

or c) a simple note is desired.

6.3.0.1.1: The component/component relationship needs to be better distinguished from the relationship that exists between the primary and adjunct components of an aggregate resource. The following addition is suggested:

A component/component relationship is a relationship between one component of an aggregate resource (i.e., one component within a resource comprising two or more components) and another component of the same aggregate resource, none of which is primary or adjunct (see 6.7.0.2).

6.3.0.2.2: Suggest that a definition for “independent resource” be given. The difference between 6.9 and 6.3 still seems to be an issue.

6.3.1.2.1b1: Instruction should read: 6.3.1.2.1b1.

6.5.0.1.1: We do not think that format/format relationships should be restricted to resources “issued by the same publisher, etc.” We, therefore, suggest that the phrase be deleted.

6.5.0.2.1: Suggest deleting: “from the same publisher, etc.”.

6.5.1.1.1: We do not think that related format relationships should be restricted to resources “issued by the same publisher, etc.” We, therefore, suggest that this condition be removed.

6.5.1.2.1: Suggest that “from the same publisher, etc.” be deleted.

6.7.0.2.3: There is a reference to 3.7 (accompanying material). Should there also be one from 3.7 to 6.7?

6.9.0.2: See comment at 6.3.0.2.2.

6.11: Suggest that this relationship can be integrated into 6.6. Source/Derivative relationship by expanding the scope of 6.6.1.1 to include the scope for music resources from 6.11.0.1.1, i.e., transfer relationships a)—d) from 6.11.0.1.1 to 6.6.1.1. If JSC decides not to integrate the scope for music at 6.6.1, then CCC suggests that a see reference to 6.11 be added at 6.6.1.

6.11.0.1.1b: If JSC decides not to integrate 6.11 into 6.6, then CCC suggests adding a see reference to 7.7.3 as follows:

b) the relationship between a musical adaptation (see 7.7.3) and the work on which the adaptation is based
6.11.0.2.2: The reference to the types of relationships listed as a) to d) are given as subsections of 6.11.0.1 instead of subsections of 6.11.0.1.1. Was this intentional?

6.12: Suggest that this relationship can be integrated into 6.6 Source/Derivative relationship by expanding the scope of 6.6.1.1 to include the scope for art resources from 6.12.0.1.1, i.e., transfer relationship a) as reworded below, and relationship b) from 6.12.0.1.1 to 6.6.1.1. Reword relationship a) as follows:

a) the relationship between an art adaptation from one medium of the graphic arts to another and the work on which the adaptation is based

If JSC decides not to integrate the scope for art resources at 6.6.1, then CCC suggests that a see reference to 6.12 be added at 6.6.1.

6.13: Although these instructions can also be integrated into 6.6 Source/Derivative relationship, it may not be obvious that relationships of this nature can be linked.

6.13.1.1: Typo: “regulations” should be “regulation”.

Chapter 7
General comments
Although we acknowledge that title as primary access point is the default when a person, family, or corporate body cannot be attributed primary responsibility, CCC feels that this should be stated explicitly.

Specific comments
7.1.2.1b.1: Another closing parenthesis is required at the end of the sentence.

7.2: There should be separate guidelines for an unnamed (vs. not named) person, family, or corporate body responsible for creating the work. Situations in which an access point can be under a phrase, characterizing word but not a non-alphabetic/non-numerical device should not be illustrated only with examples. The reference to 7.2.7 at 7.2.0.4 and the last few examples given at 7.2.1.2.1 are inadequate in making a distinction between these two situations. Cf. AACR2 21.5.

7.2.0.5: A definition of what constitutes a performance is needed, e.g., whether a videorecording of a staged play or opera is considered a performance. See also comments at 7.2.8.

7.2.1.1.1: That primary access for a corporate body takes precedence over that for a person or family is too important a concept to be relegated to a footnote. CCC would prefer to see this as part of the instructions.

7.2.1.2.1, example 18 to last example: These examples are an expansion of the rule in determining which person, family or corporate body is “responsible for creating the work”. The explanatory text in these examples should be part of the instructions. See also comment at 7.2.

7.2.1.4: To parallel the instructions for person or family, we suggest adding: “(whether named in the resource being described or not)” at a), b), d) and e). Currently only category c) states that the corporate body must be named in the resource.
7.2.2.4: For consistency, suggest that the word “principally” be added to the heading.

7.2.3: Should there be a definition for “compilation” versus “collection”? Is there a distinction between the two? Cf. AACR2 and ALA Glossary definitions

Collection: 1. Three or more independent works or parts of works by one author published together. 2. Two or more independent works or parts of works by more than one author published together and not written for the same occasion or for the publication in hand. (AACR2)

Compilation: A [resource] formed by collecting and putting together works of various authors without editorial alteration of the text, such as an anthology. (ALA)

7.2.4.0.3: Since musical works have their specific section and that none of these instructions even apply to them, a general reference to the section for musical works should be sufficient without making the distinction between “adaptations” vs. “arrangements”.

7.2.4.2.1: In determining principal responsibility for adaptations, the term “attributed” has been used instead of “represented”. Yet at 7.2.4.1.1, representation appears to be a factor. We note the instructions for revisions at 7.2.4.3.1 state: “no longer represented as being responsible”. We suggest that the wording be more consistent.

7.2.5: Suggest that the heading be more specific: Abridgements or translations of previously existing works. The other two categories addressed at 7.2.5.0.2 and 7.2.5.0.3 should be addressed elsewhere since the heading would not necessarily direct the cataloguer to this section.

7.2.6.0.1: The categories should state specifically that they refer to “previously existing works”. Cf. 7.2.4.0.1, 7.2.5.0.1.

7.2.6.0.2: This reference does not logically belong under the heading of “previously existing works” since works of collaboration are original works. The reference in AACR2 at 21.11A1 was appropriate since it was under the heading Illustrated texts (21.11).

7.2.6.3: Since these instructions are under the heading of “previously existing works,” it is assumed that these works are not collaborations between author of text and artist. However, if these instructions are read in isolation, this is not clear. Suggest adding “previously existing work” as has been done at 7.2.6.2.

7.2.7: These instructions also refer to “unnamed” group and this term should therefore be a part of the heading.

7.2.7.1: This general guideline could include “unnamed” as well. The instructions at 7.2.7.5 refer to “unnamed group” but there is no mention in the heading of an “unnamed person” which is different from an “unknown person”.

7.2.7.3: In this instance, “unknown” should be defined. It is not clear that the use of symbols as a form of name is considered to be unknown (e.g., last example at 7.2.7.3.1) or unnamed. Cf. 7.2.7.5. The “Author of Early Impressions” example at 7.2.1.2.1 may also be confusing in relation to the instructions at 7.2.7.3. See also comment at 7.2.
7.2.7.4: It is conceivable that an “unnamed” family is responsible, in which case the primary access point would be title. This should then be reflected in the heading for this section. Cf. 7.2.7.5.

7.2.8: The following comments relating to Performances have been proposed by the CCC representative from the Canadian Association of Music Libraries, Archives and Documentation Centres (CAML):

We are concerned that the general guideline at 7.2.8.1 will be very difficult if not impossible to apply easily for sound recordings that comprise two or more works, be they by the same composer or by different composers. In order to apply this rule in these cases, a cataloguer will have to determine the level of creative responsibility by the performer(s) for each work in the collection to determine if rule 7.2.4 or rule 7.7.3 should apply to all of them and, consequently, to the resource as a whole. Except for Western art music, it is usually not possible to determine if the performances involve "substantial creative responsibility for adaptation, improvisation, etc., on the part of the performer(s)" (rule 7.7.3.1 d) just by examining the resource; most often, the only way to tell is to listen to the works recorded. But this can work only if the cataloguer knows the works well enough already! This approach is simply not workable. So much so that we fear that as a work-around solution, cataloguers will not even attempt to ascertain the level of responsibility of the performer(s) and invoke more or less systematically the “in case of doubt” provision at 7.7.3.3 (provided that it applies also to performances, which is not totally clear), which is not better, in our opinion, than having purely pragmatic rules in the first place.

We don’t believe we can make the rules easier to apply unless we break from a principle-based approach and try to be more pragmatic. One possible solution is to:

-apply 7.2.8.0.2 only for single works. This would involve deleting 7.2.8.0.2 and 7.2.8.1 and incorporating some of the wording of 7.2.8.0.2 in 7.2.8.2.1, (the addition of “substantial” parallels the use of the term at 7.7.3.1c); 7.2.8.2.1 to read:
  If the performance is of a single work, use the access point prescribed as the primary access point for that work as the primary access point (see 7.2.1-7.2.6), unless the creative responsibility of the performer(s) entails substantial responsibility for adaptation, improvisation, etc., in which case follow the instructions on adaptations of non-musical works given under 7.2.4, or the instructions on adaptations of musical works given under 7.7.3, as appropriate.

-leave 7.2.8.3 and 7.2.8.4 as is

-reword 7.2.8.5 so as to allow principal performers to be chosen as primary access points based on the type of music contained in the resource, as in AACR2 21.23D:

a) Compilation with a collective title
  If the performance is of works by different persons, families, or corporate bodies and has a collective title, use the access point prescribed as the primary access point for the works as a compilation of works by different persons, families, or corporate bodies as the primary access point (see 7.2.3.2). However, if the works are of a type in which the participation of the performer(s) goes beyond that of performance, execution, or interpretation (as is commonly the case in “popular,” rock, and jazz music) and if one or more principal performers are named on the
preferred source of information [or, in the resource], use the access point for the principal performer or the first principal performer as the primary access point.

b) Compilation without a collective title

If the performance is of works by different persons, families, or corporate bodies and has no collective title, use the access point prescribed as the primary access point for the first work in the compilation as the primary access point (see 7.2.3.3). However, if the works are of a type in which the participation of the performer(s) goes beyond that of performance, execution, or interpretation (as is commonly the case in “popular,” rock, and jazz music) and if one or more principal performers are named on the preferred source of information [or, in the resource], use the access point for the principal performer or the first principal performer as the primary access point.

Note: The notion of “principal performer” was judged potentially confusing in AACR2 and LC issued an LCRI (21.23C) to clarify this situation. We suggest that the AACR2 definition of “principal performer” be adapted to the RDA context as follows:

**Principal performers** are those given prominence (by wording or layout) in the preferred source of information of the resource [or, in the resource]. When only one performer is named in the preferred source of information of the resource [or, in the resource], that performer is considered to be the principal performer. If all the performers named in the preferred source of information of the resource [or, in the resource] are given equal prominence there, all of them are considered to be principal performers.

We believe this solution would have the advantage not only to make the task of the cataloguer easier but also to conform to the common citation practice that ALA referred to in 5JSC/Chair/5/Sec follow-up/ALA response and that emphasizes the responsibility of performers in sound recordings, at least in the realm of popular music, jazz, etc.

If our proposal to delete 7.2.8.0.2 and 7.2.8.1 and to reword 7.2.8.2.1 are not accepted, we suggest changing the wording of 7.2.8.0.2 and 7.2.8.1.1 so that these rules refer to the notion of "substantial responsibility" also referred to in rule 7.7.3.1c, i.e.:

7.2.8.0.2. If the level of responsibility of the performer(s) entails substantial responsibility for adaptation, improvisation, etc. [rest of the rule unchanged].

7.2.8.1.1. If the resource comprises a performance, use the access point prescribed as the primary access point for the work performed, unless the level of creative responsibility of the performer(s) entails substantial responsibility for adaptation, improvisation, etc. [rest of the rule unchanged].

See also comment at 7.7.3.3.

**7.2.8.5.1a.1:** It would be more direct to state that the primary access point is the collective title rather than to give a see reference to 7.2.3.2.

**7.2.8.5.1a and 7.2.8.5.1b:** Suggest that the following (cf. 7.2.3.1.2) be added at the end of each instruction:
For guidelines on using citations, access points, or other conventions to record the works or parts of works contained in the compilation, see 6.2.1.

7.3.1.1, 7.3.1.2, 7.3.2.1, 7.3.3.1, 7.3.4.1, 7.3.5.1, 7.3.6.1: Since “prominently” is no longer linked to sources of information, CCC suggests the deletion of “prominently” in all cases. We have not gone through chapter 7 to find all instances.

7.7.3: Suggest that these instructions can be integrated into the general instructions on adaptations at 7.2.4 by expanding the scope of 7.2.4.0 to include the categories at 7.7.3.1, i.e., transfer categories a)—d) from 7.7.3.1 to 7.2.4.0. If JSC agrees to this integration, then the reference at 7.2.4.0.3 will need to be deleted.

7.7.3.2: If JSC decides not to integrate 7.7.3 into 7.2.4, then the last sentence probably should just be a reference to 7.3 or should not be there at all.

7.7.3.3 (Comment from the CAML rep to CCC): The wording of 7.7.3.3 implies that a work that is not an adaptation is necessarily an arrangement. Since some performances entail a certain level of creative responsibility on the part of the performer (e.g. adding ornamentation, realizing a continuo, improvising a cadenza) without there being a change in medium or a simplification involved, we suggest rewording the instruction as follows:

In case of doubt, use the access point for the original composer as the primary access point.

7.7.5: These instructions could be moved to 7.2.6 as a new subsection 7.2.6.4.

7.9.0.1.1: Suggest including at a): , including administrative regulations that are laws.

7.9.1: Same comment as at 7.9.0.1.1.

7.9.1.3.3 and 7.9.2.2.1: It is conceivable that these two instructions when read in isolation could be confused since they both refer to “If a law or laws and (the) regulations, etc., derived from (or, made pursuant to) the law(s) are issued (or published) together…”

7.9.5: CCC is reconsidering its earlier position on entering all treaties under title. The following was not suggested during the simplification round of chapter 21 but the specific combinations at 7.9.5.5 could be removed and allow 7.9.5.1 or 7.9.5.2 to address all situations. This would only have an impact on 7.9.5.5.1 and 7.9.5.5.4 that currently follow the instructions at 7.2.2.2. (more than one corporate body responsible for creating the work). In the majority of cases, the change would mean that the primary access point would be the government or corporate body whose access point is first in English alphabetic order instead of the first named. Alternatively, in keeping with internationalization, the instructions at 7.9.5.1.1b) could be revised to make the first named instead of the first in English alphabetic order to be the primary access point. Such a revision would bring the entry of any treaty regardless of the level of government involved (international, national, or below national) in sync. The revisions are underlined; current examples not transcribed.

7.9.5.1 Treaties, etc., between two or three governments, etc.
7.9.5.1.1 For a treaty, or any other formal agreement, between two or three governments at any level, including any body exercising treaty powers such as Native American nations and African tribal governments, or between two governments at any level and a non-governmental corporate body, use as the primary access point (in this order of preference):

a) the access point for the government or non-governmental corporate body on one side if it is the only one on that side and there are two governments, etc., on the other

**Nisga’a Nation**
*Nisga’a Final Agreement, signatories: Nisga’a Nation, Canada and British Columbia. [http://www.ainc-inac.gc.ca/pr/agr/nsga/nisdex12_e.pdf](http://www.ainc-inac.gc.ca/pr/agr/nsga/nisdex12_e.pdf)*

b) the access point for the government or non-governmental corporate body that is named first.

7.9.5.1.2 Provide an additional access point(s) for the other government(s) or non-governmental corporate body.

7.9.5.1.3 If an agreement is contracted by the member governments of an international intergovernmental body acting as individual entities rather than collectively, treat the agreement as a treaty between governments.

**7.9.5.2 Treaties, etc., between four or more governments, etc.**

7.9.5.2.1 For a treaty, or any other formal agreement, between four or more governments at any level, or between three or more governments at any level and a non-governmental corporate body, use the title (either the title proper or the preferred title for the treaty, see 13.6.X) as the primary access point.

7.9.5.2.2 Provide additional access points for the other governments or non-governmental corporate body that are signatories to the treaty.

7.9.5.2.3 If the treaty, etc., is the product of an international conference, provide an additional access point for the conference.

7.9.5.2.4 If an agreement is contracted by the member governments of an international intergovernmental body acting as individual entities rather than collectively, treat the agreement as a treaty between governments.

Existing 7.9.5.3 and 7.9.5.5 and all their sub-instructions are to be deleted and the examples are to be transferred to the revised 7.9.5.1 and 7.9.5.2.

**7.9.5.5.** For an alternate proposal to the new proposal to add a new instruction (5JSC/CCC/1), see 7.9.5.
7.9.5.5.1: The instruction number given should only be to 7.2.2.3 (Two or three persons, families, or corporate bodies principally responsible). Instruction 7.2.2.2. in which principal responsibility is an issue does not seem to apply.

7.9.5.5.4: The instruction number at the end of the first sentence should be to: 7.2.2.3 (Two or three persons, families, or corporate bodies principally responsible).

Addendum to RDA Part A – Chapters 1 to 5

1.1.6.3: Would it be necessary to refer to chapter 11 as to what is consider a named family? For example, two brothers, each using their own name, “family” would not be considered an access point unless that term was used to identify a particular name and that acts, or may act, as a unit. Cf. 1.1.6.4.

Comments on Examples

General comments
Suggest including as many examples as possible to illustrate the new terminology.

We also question the use of ISBD punctuation in examples without an explanatory note stating that ISBD specifications are being followed, as is done in other RDA chapters.

The inclusion of initial articles and the capitalization of access point examples do not conform to current practice.

Specific comments

Chapter 6

6.1.5.0.1: “F. Lamb Sculp.” would normally appear as a statement of responsibility since for materials of this vintage the engraver is often, but not always, the creator or otherwise has some creative contribution.

6.1.7.0.1: The example should indicate that it is following ISBD specifications.

6.2.1.2.1b.1: Typo: described should read: described

6.3.1.2.1c.1: Typo: Spacing missing between “140” and “p.”

6.4.1.2.1a.1: Is the example illustrating the alternative instruction at 6.1.3.0.3?

6.6.1.2.1a.1 (p. 6-21): A citation convention is normally used when the addition of a word or phrase indicates the nature of the relationship. If the relationship is obvious from the title, an access point convention is probably sufficient. Example 3 seems to illustrate otherwise.

6.6.1.2.1a.1 (p. 6-21): In the last example, “Translation of” should be in italics.

6.7.1.2.1a.1: The last example should be substituted for the last example at 6.7.1.2.1b.1 for the same reason cited at 6.6.1.2.1a.1.

6.11.2.1.1: Suggest that the example be in the form of an informal reference instead of a citation; this would indicate the relationship more precisely:
Based on an aria from Don Giovanni by Mozart.

**6.13.1.1, 2nd example:** Other information that has been placed in square brackets would not be supplied according to 2.3.3.4.

**Chapter 7**

7.2.1.2.1 (p. 7-9): Goldsmith, V. H. example: Substitute *originating* for *emanating*; *originate* has been used elsewhere instead of the AACR2 term *emanate*.

7.2.1.4.4 (p. 7-13): Multi-State Teacher example: *Mutli-State* should read: *Multi-State*.

7.2.1.4.4 (p. 7-14): Police example: In order to explain (i.e., justify 7.2.1.4.1d) choice of primary access point, suggest revising the last sentence of the explanatory text to read as follows:

> Videorecording of the band the Police performing their own songs.

7.2.6.2.2: These instructions might be more relevant at the end when primary access has been addressed for all types of resources e.g., laws (the explanatory text for the Todd example is not particularly relevant unless 7.9 is known).

7.2.8.2-7.2.8.5: Suggest adding examples of videorecordings of staged plays or operas to illustrate that the instructions also apply to them.

7.3.9.1: Typo: *Additonal* should read: *Additiional*.

7.3.10.1: Typo: *Additonal* should read: *Additiional*.

7.3.11.1: Typo: *Additonal* should read: *Additiional*. 