In this response, comments of a general nature precede specific comments on instructions in chapters 6 and 7 and the Addendum (following the order of the original document). Finally, a number of comments on examples are provided to assist the work of the Examples Group.

**General comments**

The draft of chapters 6 and 7 has been causing CILIP members some problems. Difficulties focus on three aspects: organization, language and terminology.

**Organisation.** Now that the texts are available, CILIP is not persuaded that, to the user, there is any clear rationale in placing chapter 6 before chapter 7. What seemed quite acceptable in the RDA Prospectus seems far less straightforward with the draft texts to hand. It does not seem to make sense to start a discussion about related resources, using access points as it does, before the chapter that deals with the choice of those access points.

**Language.** Perhaps because so much of chapter 6 is essentially conceptual (and perhaps, too, because much less of it derives directly from AACR2 than other chapters), CILIP members found it less readily approachable than other draft chapters made available thus far. The language is at times quite dense, so that the intended meaning is less easily (and quickly) grasped.

**Terminology.** The use of the term ‘citation’ is problematic, and not very helpful in a cataloguing context. On the one hand its intended meaning is not at all clear; on the other, the use of a term which already means different things to different communities within the information world risks uncertainty and, possibly, confusion. Ideally, CILIP would prefer that the term not be used at all. More realistically, a broad set of examples illustrating citations would be of benefit. Equally, the introduction of ‘primary access point’ is not without its problems as public discussion on RDA-L has demonstrated. Whilst the desire to move away from (the equally problematic, and often misunderstood) ‘main entry’ is laudable, there is still some way to go before would-be users are persuaded that there’s a clear difference between the two and that change is necessary.
Chapter 6

CILIP is concerned that 6.1.2.3 and 6.1.3-6.1.7 rules seem to be written too much from within the AACR/MARC community. They broadly make sense if you are from that community, but 6.1.3-6.1.7 do a lot more than the rest of chapter 6 in that they try to prescribe just five different ways of doing things that 6.1.2.3 has already indicated are limited only by encoding standard and system functionality.

These communities may themselves be to blame because comments on AACR2 12.7B8 showed that it would be helpful if 12.7B8 were not written in RDA in such terms that it treated relationships only as notes you would make in the description. 6.1.2.3 almost says everything that needs to be said and it is arguable that the user could then skip from 6.1.2.3 to 6.2 and leave it up to the encoding standards and systems’ functionality to determine what was an access point and what was a citation – accepting, of course, that the user would need to refer heavily to chapter 7 regarding the former.

The associated footnotes belie the apparent ease in actually applying 6.1.3-6.1.7. Those footnotes should really be writ large under 6.1.2.3. And, as Renette Davis’ posting to RDA-L (‘Embedded descriptions’, 25 July 2006) made clear, it quickly becomes clear that the correspondences between any relationship in 6.2-6.10 and any of 6.1.3-6.1.7 are far more complex than the draft allows.

Having got this far (and remembering that it is the intention to offer a ‘Your RDA’ as part of the online product) it seems preferable for chapter 6 to give the user the principles of the relationships and then to leave it at that. This is no small achievement - to have unpacked 12.7B8, for example – and, in a way, is sufficient if RDA is really meant to contain the ‘primary element, force, or law which produces or determines particular results; the ultimate basis upon which the existence of something depends’ (OED def. 3 of ‘principle’ n.).

If 6.1.3-6.1.7 were omitted, it might be appropriate to either add text to 6.1.2.3

   Examples of relationships include citations, access points, embedded descriptions, informal references, resource identifiers, etc. for related resources.

or to make a new point 6.1.2.4 along similar lines.

And the examples could perhaps be included, too, at this point.

If 6.1.3-6.1.7 are to remain, CILIP suggests that they should be better contextualised with respect to 6.1.2.3, and that there is going to be a need for someone, somewhere, to tabulate which of 6.1.3 to 6.1.7 the user actually applies for each of 6.2-6.10 and in which situation (manifestation, expression etc.).
6.1.3.0.1. It might be useful and helpful to suggest using a standard word or phrase to improve consistency in metadata, as follows:

   Indicate the nature of the relationship by using a **standard** word or phrase

6.1.4.0.1 The example provoked several respondents to comment on the presence of the initial article in the title, demonstrating the difficulties inherent in making drafts of different chapters available at different times.

6.1.4.1.1 This reads badly and potentially ambiguously. Elsewhere in the draft, terms such as ‘title access point’ have been used, helpfully. Here, we suggest changing ‘construct the access point using that access point’ to ‘construct the name access point using that name’, or some such. Use of such terminology should be standardised throughout the draft.

6.1.5. The term ‘Embedded descriptions’ is unclear and unhelpful, and has caused puzzlement on RDA-L. Presumably the term will be included in the RDA Glossary?

6.1.7.0. CILIP is unsure whether the appearance in the example of the ISSN preceding the serial title is simply a display issue, or whether it is required by the instruction at 6.1.7.0. Certainly it gives an odd impression when users are mostly accustomed to seeing the title before the ISSN in catalogue descriptions and elsewhere. And the equals sign presumably derives from the ISBD? If so, the example will need to indicate this.

6.2. Should there be a reciprocal note somewhere in 6.2 about the alternative given in 6.3.0.1.3?

6.2.0.1.1. CILIP notes that ‘component’ and ‘unit’ will need to be defined clearly in the Glossary.

6.2.1.2. This and similar instructions imply that access points can now be considered a descriptive element - in other words they can stand on their own and do not have to be justified by a note or another part of the description. This is not a problem in itself, but is worth bearing in mind when dealing with early printed resources book cataloguing, where the specialist community would presumably want to specify that all access points are indeed justified in the description.

6.2.2.1.2 includes ‘series’ in the definition of aggregate resource. The rest of 6.2.2 then gives the usual options for recording the aggregate resource, including citation, access point, embedded description, informal reference, and resource identifier.

CILIP wonders if this might not cut across the approach taken in 2.10 (Series)? It seems at first glance that the instructions in 2.10 advocate only the access point approach only (cf the example given in 6.2.2.2.1b.1). But if the model for citation in 6.2.2.2.1a.1 is used, the result would seem to be two statements:
CILIP appreciates that this is largely a format/encoding issue, but thinks it would nevertheless be helpful to cross-reference 6.2 with 2.10 in some way.

**6.4.2.1.1.** This definition could be confused/conflated with a previous edition, (cf 6.8). But 6.4.2.1.2 does clarify this by listing what reproductions can be. Should these two paragraphs simply be conflated into a revised 6.4.2.1.1?

A reproduction is a resource produced by using a previously existing resource as its source. Reproductions include facsimiles, photomechanical reproductions, etc.

**6.4.2.2.1.** CILIP questions the value of this instruction and, in particular, the rationale for permitting the ‘embedded description’ technique. Even as an optional element, this seems to be confusing what it is that the cataloguer is trying to describe, and the resulting description may no longer represent a single manifestation at all. It would be interesting to see this instruction subjected to rigorous logical analysis.

**6.5.0.1.1.** Aren’t all such formats at the manifestation level?

**6.8.** Since simultaneously issued editions are the only type of edition/edition relationship identified, CILIP wonders whether this section could be simplified somewhat.

**6.10.1.1.2 / 6.10.2.1.2.** Perhaps it would be helpful here to have some ‘reminder’ in the text (and not just by way of the examples) of the need to consider group 2 entities’ responsibility changing when describing the earlier resource. Maybe we just need a reference to ‘name-title’ citations/access points?

This may likely apply to other relationships in chapter 6, but it was most obvious to CILIP in 6.10.

A lot hinges on 7.1.4. There is no reference anywhere in chapter 6 to 7.1.4 which is surprising given that the chronological relationships in the former all hang on application of 7.1.4 as much as on the application of 2.3.1.11 and 2.3.1.12.

**6.12.2.1.1.** This is unclear. What does ‘separately issued’ mean? Would this apply to, say, digital images in a webpage?

**Chapter 7**

This chapter has caused some consternation because of its use of the actual forms of name in examples, rather than the periphrases used in AACR2 chapter 21. Some may
regard it as illogical to use specific forms of name when RDA has not yet come to the chapter that instructs how to establish them. For example, 7.2.5.3 seems to assume some knowledge of omission of article at start of uniform title (or perhaps the example is in error since 6.6.1.2.1b.1, 1st example, retains the article in its suggested access point). In any case, it could be considered misleading to use specific forms of name, as it appears to give the examples an authority which they do not really have.

As in AACR2, the draft of chapter 7 makes extensive use of the concept of prominence. CILIP asks whether the glossary will include a definition of ‘prominently’ or will it continue to appear elsewhere? There ought to be a reference to it, otherwise people will assume the word is used in its normal sense rather than as a technical term.

CILIP welcomes the removal of AACR’s distinction between shared and mixed responsibility.

7.1.4.3.1. CILIP found this instruction confusing in the way that it refers to instructions specific to serials as a way of dealing with integrating resources. Also, we wonder how successful this approach would be in the online product – a user asking to see only instructions relating to integrating resources would want all the appropriate information in one place.

7.2.0.1.1. It is not clear what ‘embodied in the resource’ means.

7.2.0.2.1 (and also 7.2.3). As currently drafted, it would seem as though compilations by two different persons, etc., would be entered under title? Is this the intention, or is there does a minimum number apply to ‘different’ in these circumstances? This needs to be clarified.

7.2.1.1.1. CILIP welcomes footnote 1, but believes it should be brought into the body of the instruction and possibly even transferred to 7.2.0 so that it is more obvious.

7.2.1.2.1. For anonymous works which have as their statement of responsibility something along the lines of ‘By a physician’, would it be helpful to change the instruction to make the title the primary access point, thus making the instruction consistent with that for the equivalent situation when a non-specific corporate body is named (see 7.2.7.5.1)? CILIP could not agree on this point, and offers it to JSC as something worth further consideration.

7.2.1.4. The extension of the concept of ‘creation’ to resources assembled by and relating to a family needs to have some equivalent in 7.2.1.4, where (at least in the UK and Ireland – and, CILIP imagines, elsewhere too) landed estates are often responsible for the creation and accumulation of a given collection of records. For such resources it is logical to use an estate name as the primary access point. The current wording of (a), carried over from AACR2, is a little too restrictive to meet that need.
7.2.1.4. AACR2 talks about ‘emanating’ whereas the draft says ‘originates’. In AACR2 origination was one of the three means by which a resource might emanate from a corporate body. CILIP is unsure where the new wording is deliberately restricting the situations in which a corporate body might be given as the primary access point or whether there is an expectation that there will be no practical impact from the change of wording and that it is offered in the interests of clarity. If there is any doubt, then CILIP would prefer to persist with the AACR2 wording, as it would not desire any lessening of the use of corporate body as primary access point.

7.2.1.4.1c(iii). The reference to 7.2.2 seems to be wrong; it certainly does not refer to the definition of a corporate body.

7.2.1.4.5. The phraseology of this instruction seems less clear than the AACR2 equivalent (21.1B2), which ended ‘treat it as if it does not’.

7.2.3.3.1. The language here comes over as being rather tortuous, especially in the first sentence.

7.2.4.2.1. This instruction needs to be make clear that the user has determined that the adaptation is itself to be regarded as a new work.

7.2.4.3.1. A strict interpretation of this instruction – with its dependence on how the manifestation presents itself - implies that different manifestations of the same resource could end up with different primary access points. This would seem to be undesirable.

7.2.4.3.1. Suggest ‘presented’ in place of ‘represented’.

7.2.6.3. Since it is often impossible for the cataloguer to determine whether they have a work with ‘added illustrations’ or a work created jointly by artist and writer, and since the resulting records, in terms of the access points given, will be identical, CILIP wonders whether there is any practical purpose to this instruction.

7.2.7.2.1. The use of ‘probable’ seems clumsy - statistically-speaking, ‘uncertain’ and ‘probable’ mean the same thing.

7.2.7.4. Whilst the instruction is clearly needed for the sake of completeness, in practical terms it is hard to see how it could be known that it was a family responsible for creating a work at all if that family is ‘unknown’, so it will be interesting to see what example can be provided at this point. Perhaps this instruction could be merged with 7.2.7.3.1, so that it reads:

If the person or family responsible for creating the work is unknown, use the title as the primary access point

7.2.8.1.1: This is rather a long sentence! Can it either be rephrased, or divided by starting a new sentence after ‘improvisation, etc.’?
7.3.1.2. Here six names are supplied as authors, with access points for the six. According to 2.4.0.5, naming more the first of each group in a statement of responsibility is optional, so that the title data might read:

Using and ‘the scene’ : patterns and contexts of drug use among
Sydney gay men / Kate Ireland ...

CILIP proposes rephrasing 7.3.1.2 to take account of this optionality to make clear that the access points are provided only if it has been decided to include them in the description in the first place.

7.3.7.1. Without turning the parenthetical examples into a comprehensive list, CILIP would like to see writers of prefaces added as another category of contributor for whom additional access points by (optionally) be provided.

7.7.8.1. CILIP suggests that it would be useful if this instruction could anticipate in some way the exception covered in 7.7.8.2, e.g.:

For a libretto published without reference to its musical setting...

7.9.1.2.2. In principle the instruction is straightforward, and for a compilation of laws governing two or three jurisdictions it works well. In some situations, especially for countries organised along federal lines where there are many jurisdictions which have the power to enact laws, it could result in a very large number of added entries. Perhaps there should be some sort of ‘escape clause’ to prevent this?

7.9.5.1.1(b). For individuals, where there are two or more authors of a work, the rule is to use as the primary access point the author who is named first. The same instruction should be applied here. ‘English alphabetical order’ should not be a basis for selecting the primary access point.

7.10.3.0.1. Typo. Supply missing closing double quotes before final fullstop.

7.12. Despite the efforts of 7.12.0.1.2 to generalize this instruction, CILIP feels it would be better to recognize that the only instruction of substance provided here is the one specific to ‘academic disputations’, and to cast the instruction accordingly (changing the heading in the process).

Addendum

1.1.7. Both ‘primary access point’ and ‘additional access point’ can be controlled access points. This isn’t made particularly clear, either here or at 7.1.2.1c.1, the only other place where the concept of controlled access points is covered in Part A.
Comments on examples

6.1.5.0.1 Delete the hyphen after ‘1676’. Also, there was doubt about the use of the phraseology ‘appears in’ (compare with the use of ‘in:’ in 6.2.2).

6.1.6.0.1, 1st example. Should CT read Conn.? Presumably this depends on final decisions on when abbreviations should and shouldn’t be permitted and on any prescribed forms that might apply to those that are used?

6.1.6.0.1, 3rd example. Appears to have an incorrect character substituting for the apostrophe.

6.2.2.1b.3. Examples are needed here (though this is not a new provision).

6.2.2.1c.1. Is space correct after 8 at start of part-title? Differs from AACR2 ch. 13.

6.3.1.2.1a.1: It might be necessary to make clear why different labels are being used (examples 2 and 3 could well be sound recordings, but what about the first example?).

6.6.1.2.1a.1, 2nd example. CILIP asks the Examples Group to review the capitalization of ‘Thesaurus’ in the parentheses.

6.6.2.2.1a.1, 2nd example. This needs a space before Elliot’s dates.

6.12.1.1, 1st example. CILIP doesn’t think an engraving of a picture would normally be termed an ‘adaptation’ of it and suggests changing the label to read:

Engraved after:

7.2.1.2.1, 7.2.2.3.1 and elsewhere. Many examples now have spaces between initials in access points. Is this a deliberate change? Compare with 7.2.2.2.1 where there is an example without such spaces.

7.2.1.2.1, 4th example. This might better read

Burne-Jones, Edward

(Primary access point for: The doom fulfilled / Sir Edward Burne-Jones. An oil painting)

Or maybe even An original oil painting? Something to show it isn’t a reproduction and that 7.8.1 isn’t applied.

7.2.1.2.1, 10th example. Typo. Heading should read

Goldsmith, V. F.

7.2.1.4.4. Examples for Army Materials Technology Conference and Biennale di Venezia both employ superscript letters; presumably this is an unintended ‘Microsoft moment’?
7.2.2.2, 2nd example. This is confusing. CILIP thinks that the heading requires some sort of brief explanation as it is not what a user might immediately expect from the parenthetical description.

7.2.2.4.1. It would be helpful to separate the examples of primary access by title from those of primary access by author in some way (e.g. by use of a ‘cf’), as they represent a different scenario.

7.2.4.2.1, final example. The marks of elision look a little distracting; perhaps this is a situation in which it would be better to transcribe the full statement of responsibility instead?

7.2.4.3.1, 2nd example. The capitalization of ‘Thesaurus’ does not seem justified in this context.

7.2.6.2.1, 1st example. Perhaps this should be:

Demosthenes / with an English commentary by Robert Whiston

7.2.8.3.1, final example. Substitute ‘none of whom is’ for ‘none of whom are’, and remove superscript from ‘30th’.

7.3.1.2, 1st example. A formatting error has resulted in the intended six access points being concatenated into five.

7.3.3.1. As Bercusson is responsible for the annotations rather than the act, should this probably read:

The Employment Protection Act, 1975 / with annotations by Brian Bercusson

7.3.4.1: The instruction to provide an access point for a translator prominently named in the resource or associated with it in a reference source is an improvement upon AACR2’s instruction to provide an access point only for the translator of a literary work or if a work exists in two or more translations (something which can be difficult to establish, or which can change over time). But as the rule has changed, would it be an idea either to change the example, or to add an example for a work where the translator would not have merited an access point under the old rule?

7.4.0.1. CILIP’s Rare Books Group offers the following examples for consideration:

Caxton, William, ca. 1422-1491
Baskerville, John, 1706-1775
Kelmscott Press

7.5.0.1. CILIP’s Rare Books Group offers the following examples for consideration:

British Museum. Department of Printed Books, former owner.
StEdNL

(British Museum sale duplicates are found commonly and are often considered important.)
Moore, John, 1646-1714, former owner. UkCU
(John Moore, Bishop of Ely, whose gift of George III’s library to Cambridge University Library tripled its holdings and greatly increased its significance.)

7.10.2.1, 2nd example. add the ISBD’s ‘;‘ at the end of the second ellipsis to separate first statement of responsibility from the second.

7.11.1.1, 2nd example. Closing parenthesis required at end of heading.

7.12.1.1, 1st example. On the face of it, this example seems to contradict the instruction. The authorship of the respondent does appear to be established, and yet the praeses is given as the primary access point. This requires clarification. Additionally, the headings in the examples should both be in the nominative case – what follows here are the LC/NACO forms:

Schurtzfleisch, Konrad Samuel, 1641-1708
Rudolphi, Karl Asmund, 1771-1832