

TO: Joint Steering Committee for Development of RDA
FROM: John Attig, ALA Representative to the JSC
SUBJECT: RDA: Resource Description and Access sections 2-4 and 9: Constituency review of December 2007 draft

ALA has reviewed the December 2007 draft of RDA sections 2–4 and 9. We offer the following comments. We begin with some comments on the new organization for RDA, including a proposal for refining and simplifying the structure. We then offer a number of general comments on the draft, followed by specific comments in a single sequence. Editorial comments that are general in nature and comments on examples have been forwarded separately to the JSC as informal documents.

“Showstoppers” (I prefer to think of them as priority issues for JSC discussion) are marked with ► at the beginning of the paragraph. Thirty-eight comments are so designated; not all require extensive discussion.

Comments on the new organization for RDA

ALA was generally very pleased with the new organization. The rationale for the various sections and chapters – which ALA respondents had always had difficulty understanding – was now clear, particularly when viewed in the light of the table in *5JSC/Editor/4*.

► On the other hand, we feel that the outline is still overly complex and contains too much repetition. We believe that it is possible to streamline the outline in ways that will make RDA much easier to grasp and to apply. We suggest the following:

1. Make the major division between the two parts of RDA explicit. The distinction between the entities and their attributes, on the one hand, and relationships, on the other, is fundamental to understanding and applying RDA.
2. Organize all of the sections dealing with the FRBR entities and their attributes in the same way. That is, organize the instructions relating to the Group 1 entities into 5 chapters: a chapter of general instructions, followed by chapters on each of the group 1 entities. We realize that this makes the chapters on Describing works and on Describing manifestations very long and complex, but we feel that this disadvantage is outweighed by the structural consistency. Furthermore, internal groupings of elements within those chapters can help make the complexity manageable. We do not find that the introduction of the FRBR user tasks is particularly useful in guiding cataloguers in applying the instructions. And, as we move closer to a scenario #1 implementation, the alignment of the elements with one of the FRBR Group 1 entities will become even more important in applying the instructions.
3. The sections on relationships fall into two groups: four sections (currently sections 6-7) dealing with relationships related to a given resource, followed by three sections (currently sections 8-10) dealing with relationships among instances of the FRBR entities. Particularly

in the latter three sections, the structure is more complex than the instructions they contain: most of the chapters document only one unique element. We suggest that these two groups each be treated as sections and that the chapters under each of the current sections be merged into a single chapter.

These recommendations results in the following outline. Note that the captions are descriptive and are not necessarily recommended as title.

General Introduction

Part A. FRBR Entities and their Attributes

Section 1. Group 1 Entities

- Chapter 1. General guidelines
- Chapter 2. Work
- Chapter 3. Expression
- Chapter 4. Manifestation
- Chapter 5. Item

Section 2. Group 2 Entities

- Chapter 6. General guidelines
- Chapter 7. Person
- Chapter 8. Family
- Chapter 9. Corporate body

Section 3. Group 3 Entities

- Chapter 10. General guidelines*
- Chapter 11. Concept*
- Chapter 12. Object*
- Chapter 13. Event*
- Chapter 14. Place

Part B. Relationships [and their attributes?]

Section 4. Relationships relating to a given resource

- Chapter 15. General guidelines
- Chapter 16. Primary relationships between work, express, manifestation, and item
- Chapter 17. Relationship of a resource to persons, families, and corporate bodies
- Chapter 18. Subject relationship of a resource*

Section 5. Relationships between instances of FRBR entities

- Chapter 19. General guidelines
- Chapter 20. Related work, expression, manifestation, and item
- Chapter 21. Related person, family, and corporate body
- Chapter 22. Related concept, object, event, and place*

Appendices

General comments

Overall reaction. ALA continues to be frustrated by the state of the draft. In response to every draft, ALA has deplored the redundancy and the unapproachable technical style of writing. The present draft does not represent any significant improvement. As we hurry to finish this work, we are concerned that the final product will not be comprehensible to those who have not been

immersed in it for the last several years. As well, if we are hoping to broaden the audience for RDA beyond the cataloging community, making it an accessible product is critically important.

Evaluation and timing of major changes from AACR. ALA is generally open to making significant departures from AACR2 rules and practices. We feel that the development of RDA constitutes a unique opportunity to reconsider current rules and practices. We are not convinced that an extended piecemeal implementation of significant changes stretching over many years is preferable to one concerted implementation; nor are we certain that an early implementation of RDA within the existing encoding, communication, and exchange environment is reasonable. Given that, we are open to recommending some significant changes, even if this means extending the RDA development and implementation schedule. Two examples of such changes (included below) are the merging of the instructions on government and non-government corporate bodies, and the extension of the Place entity to non-jurisdictional geospatial locations, as well as to the use of the Place entity outside the formulation and qualification of names.

We ask the JSC to consider carefully the options for developing and implementing RDA, the best way to introduce significant changes, and the appropriate environment in which RDA should operate. This is a unique opportunity, and the world may not be ready for the initial steps that we propose, much less our vision for the future.

General comment. There is still too much of an emphasis on **how** rather than on **what**. As an example, the instructions to select some attribute value from “the first resource received” ought to be reduced to an instruction to select from “any manifestation”.

► **Access points.** One of the most important statements in RDA is contained in cryptic footnotes at 5.3.2 and 5.3.3: “The elements listed may be recorded as additions to the access point representing the work, as separate elements, or as both.” The distinction between describing an entity by recording its attributes and the formulation of an access point for the name of the entity needs to be treated more fully at a high level within RDA. That treatment needs to be informed by the different requirements of the different implementation scenarios: access points naming an entity are much more important in scenarios #2 and #3 than in scenario #1; the concept of access point control relates primarily to scenario #2 (although it might have a place in scenario #1); scenario #1 does *not* depend on the formulation of unique access points.

The place of access points in RDA is thus contingent. Access points naming an entity should not be given more significance than the recording of the elements describing that entity. Even though RDA will be accessed in a nonlinear fashion, we strongly recommend that emphasis be given to the recording of the elements describing an entity and that the instructions on formulating access points *follow* the instructions on recording the elements; one ALA respondent suggested that there be sub-sections on elements and access points in each chapter. The instructions on formulating access points should make it clear what role access points play in naming the entities, and under what circumstances such access points are needed.

Furthermore, the need for a *unique* access point is even more limited in scenario #1. RDA can be implemented in a relational environment without unique access points (or even any access points at all).

Access points should not be categorically required, the elements that make up the access point should be listed separately, and as should those elements that are used to differentiate

identical names or titles. For specific recommendations about required elements, see comments on 5.3, 8.3, and 29.3 below.

► **Entities as elements.** We note below some cases in which elements have been defined that actually exist as entities within FRBR/FRAD and RDA world. For example, Place associated with the corporate body (11.4): It can be argued that Place already exists as an entity, and that Place of corporate body is a *relationship* between the two entities. Likewise, Prominent member of a family (10.7) is a relationship between the person and the family. This matter is complicated by the fact that such elements may be included in an access point; would that work if the person or place were treated as a relationship?

Elements vs. element sub-types. ALA notes that in Chapter 2, all types of titles are treated as sub-types under a single elements. We recommend that the same be done in Chapter 6: Preferred title and Variant title as sub-types under Title of work, etc.; and in Chapters 9-11: Preferred name and Variant name as sub-types under Name of person, etc. Not only is this consistent with the organization of Chapter 2, but it would eliminate some redundant instructions that apply to all sub-types; it also places the emphasis on recording all the appropriate titles and names rather than on the decision about which is to be preferred.

Standard element specifications. For types of information that are given at most data elements, we would like to see these given in briefer form. For example, delete 5.8.0.2.1 and change 5.8.0.2 to “source of information: any”. It is much faster to take in the briefer form, especially when given in tabular form with other similar information (requirements, repeatability, etc.). See, for example, online MeSH displays, NISO Z39.7-2004 , Information Services and Use: Metrics & statistics for libraries and information providers–Data Dictionary, NISO Z39.76-1996 Data Elements for Binding Library Materials, NISO Z39.83-2002 Circulation Interchange Part 1: Protocol (NCIP), and NISO Z39.87 2006 Data Dictionary–Technical metadata for digital still images. Note how much more quickly one can grasp the information when given in compact form.

► **Required elements.** ALA notes with concern that almost all of the stated requirements are conditional in some way, and that the conditions are stated in footnotes to the “Required” label. ALA believes strongly that footnotes have no place in an online document; therefore, the reliance on footnotes in these cases is a matter of concern. We would like to see the requirements simplified to the point where the conditions no longer need to be stated; we offer suggestions to that effect below.

ALA is still concerned that the “required” label will be misinterpreted; we continue to prefer that “required if applicable” be used when appropriate.

► **Data about data.** ALA notes that this draft does nothing to move forward the discussion of how to record data about data in RDA. We suspect that some priority needs to be given to this discussion.

► **Scope guidelines.** ALA notes with concern that the scope guidelines in different chapters may contain different definitions. [The various definitions of “access point” are the worst offenders, there is also a problem with “preferred name” (see 16.2.0.1.1).] ALA would greatly prefer that definitions not be repeated; each should be given once, and hyperlinked if needed elsewhere. We

also recommend that contextual definitions and statements such as “as used in this chapter” be forbidden. This implies that terms are used inconsistently within RDA; it is very important not to do that.

► **Redundancy of general and specific guidelines.** The practice that has been embodied in all the drafts is to give a set of general guidelines for each element numbered X.0, followed by specific guidelines numbered X.1ff, and to include in the general guidelines a summary of all the additional, optional, and exceptional instructions included in the specific guidelines. ALA finds this redundancy unhelpful; at most, we could see the usefulness of a tabular listing, with references to the following specific instructions.

General vs. specific guidelines. ALA recommends removing the word “general” from the phrase “... following the general guidelines and instructions given under 6.1.1 ...” There is no virtue in characterizing instructions as general or specific when making a reference to them; besides, in many cases, the instructions referred to are *not* general. Such references occur at 6.23.1.0.4, 6.23.1.2.1, 6.23.1.4.2, 6.23.1.8.1, 6.23.1.11.1, 6.23.1.17.1, 6.23.1.17.4, 6.23.1.19c.1, 6.23.1.21a.2, 6.23.1.29a.1, 6.23.1.30.1, 6.28.2.0.2, 6.33.1.0.3, 10.0.1.1, 16.0.1.1, 30.0.1.1, 31.0.1.1, 32.0.1.1; the list is undoubtedly incomplete.

“First received”. There are instructions scattered throughout the draft that instruct the cataloguer to record information appearing on the first resource received. As noted above, we believe that this instruction should simply be to record the information from “any manifestation”. If this recommendation is not accepted, we have two further suggestions: (1) change “first” to “first or earliest”, and (2) change “received” to “received or accessed” as receipt does not seem to apply to remote resources: “choose the form that is presented in the first or earliest resource received or accessed.”

“Resource”. The term “resource” should be restricted to meaning “unspecified group 1 entity” or to suggesting a composite description that includes attributes of all the group 1 entities. In this draft, the term is too often used to mean “manifestation”.

Punctuation. Many instructions include an instruction to enclose certain data within parentheses, or to precede data with a comma, or other punctuation guidelines. Since RDA is not supposed to be a display standard, these instructions should be omitted from the code. ALA suggests that these display conventions be documented in Appendix E. We note that display and punctuation conventions are included in 6.20.0.3.2, 11.2.7.2.2, 11.2.7.3.3, 11.2.7.4.2, 11.2.8.4.1, 11.2.8.4.2, 11.2.9.1, 11.2.10.2.1, 11.2.12.2, 11.2.12.3, 11.2.13.1, 11.2.14.1, 11.2.15.1.2, 11.2.17.1, 11.2.17.2, 11.2.17.3, 16.2.0.4.3, 6.8.4.2d.1 and 6.29.7.2.2; this list is probably incomplete.

Footnotes. ALA does not believe that footnotes are appropriate in an online document. Notes that qualify instructions should be included in the main text. Citations to external documents should be treated as links.

Comments on specific instructions

Chapter 5

5.1.1.1, 5.1.2.1, 5.1.3.1. These introductory notes should be deleted; the captions at 5.1.1, 5.1.2 and 5.1.3 list the terms defined; just give the definitions under those captions.

5.1.2.3 and 6.2.0.1. The preferred title is an attribute of a work independent of its use as part of an access point. It should be defined without reference to access points. We note the following definition patterned on the Getty's Union List of Artist Names: "the title consistently used to refer to the work and as a default for displays."

5.1.2.3 and 5.1.2.4. ALA suggests deleting "or form of title" from these instructions. It is not clear that such a distinction is necessary.

5.1.2.4. ALA questions the wisdom of using the phrase "preferred name of a work" when preferred name is also a separate element that may be part of the preferred access point for a work. We do not see why "preferred title of a work" is not appropriate in this instruction.

5.1.3. See discussion of the concept of access points in the General comment on "access points" above; see discussion of the definition in the General comment on "Scope guidelines" above.

5.1.3.1 and 5.1.3.2. The end of this instruction needs to include expression: "... pertaining to a specific work or expression will be found."

5.1.3.3 and 5.1.3.4. The end of this instruction needs to include expression: "... for the work or expression and/or a variant title for the work or expression."

5.2.1 c) The other points here are written from the point of view of the user, yet the user is not *clarifying* the relationship; change to "understand the relationship ...". We do not object to using the same verb in naming two tasks.

5.2.1 d) and parallel section in 8.2.1. While understanding *why* "a particular title, or form of title, has been recorded as a preferred or variant name" is important to catalogers, this is not part of what catalogue users require. We may need to specify that this requirement is directed to a different type of user.

► **5.2.4.** There are now so many contradictory factors that come together under the principle of Representation that we question whether the principle has any meaning. Decisions need to be made on priorities for sources of preferred names and titles, related to the IME-ICC Statement of International Cataloguing Principles, and these priorities need to be included in 5.2.4. We also note that Representation does not accurately characterize all of the factors described; some of them are more properly either Common usage or User convenience.

The concept of an original title appears here; we believe that more thought is needed about whether the concept of the first or earliest expression of a given work should be introduced in RDA and, if so, whether it should be defined as an attribute of the work.

► **5.2.5 and 5.2.6.** ALA notes the inconsistency between the application of these two principles, and urges that this be resolved. Decisions need to be made on the principle to be followed in RDA, related to the IME-ICC Statement of International Cataloguing Principles. It is not clear that the application of either of these principles has been consistent in the present draft.

5.2.6. ALA believes that the principle of common usage (8.2.6) is also relevant in describing works and expressions. We see no point in splitting up Common usage and practice (a combined principle in the RDA Objectives and Principles document).

5.3, footnotes. ALA believes that it is unwise to split fundamentally important instructions between the main text and the footnotes. See below for our recommendation that the distinction between attributes/elements and access points for the FRBR entities needs more extended guidelines elsewhere in RDA.

5.3. ALA notes for the record that not all of the FRBR mandatory data elements are specified as required in RDA. Given the extent to which RDA attempts in principle to follow FRBR, this might be seen as a failure. ALA would like to see further consideration given to the comparison of the FRBR and RDA requirements.

► **5.3.1.** ALA strongly recommends that separate lists of required elements be given for works and expressions. The required elements for works should be Preferred title for the work and Identifier for the work; the required elements for expressions should be Content type [or an element that more directly relates to FRBR Form of expression; see our comments at 6.4] and Identifier for the expression. It is also arguable that the Preferred title for the work is a required element for describing an expression of that work, although the primary work-expression relationship may be what needs to be required instead. The cartographic elements listed in 5.3.4 are also required in describing an expression, but we suggest that they be kept as a separate sub-instruction. ALA respondents have also suggested that Source consulted and Status of preferred access point be specified as required for both works and expressions. The issue of preferred access points for works (stated in footnote 1) should be dealt with elsewhere in the instructions.

► **5.3.2 and 5.3.3.** The statement in the footnote that “the elements listed may be recorded as additions to the access point representing the work, as separate elements, or as both” is fundamentally important in understanding how RDA deals with the FRBR entities and the access points that name them. A fuller discussion is needed early in RDA that talks about the description of each of the FRBR entities by recording their attributes, and of the use of access points to name these entities. This is discussed in more detail later in this response. In the instructions on required elements, ALA urges that the elements be listed as required for describing the entity; that a separate sub-instruction be devoted to the construction of access points based on the preferred name or title of the entity; that a further sub-instruction be devoted to the construction of a *unique* access point, if desired, by adding other elements to the preferred name; that the preferred name be listed as a required element for each entity, but that the potential additions used to differentiate identical names *not* be listed (or labeled) as required. This avoids the necessity for so many conditional requirements, with the conditions specified in footnotes.

5.3.3. If this instruction and its list is retained, in spite of our recommendation above, then it should be noted that some of the elements listed are attributes of the work and serve to differentiate works with similar titles: Medium of performance (for music), Numeric designation (for music) and Key (for music). One ALA respondent also suggested that Aspect ratio and Colour should be required elements for moving images.

5.3.4. ALA has no idea what the phrase “describing the work or expression more fully” means. We believe that the requirements should simply be stated, without hinting at the sort of description in which they might be recorded.

As noted above, we recommend moving Content type to a list of required elements for describing an expression. We believe that the cartographic elements are also attributes of the expression, but we can see the utility of listing those elements in a separate sub-instruction.

In our comments on elements for cartographic resources in the old Chapter 4, we suggested that the different sub-elements listed under Coordinates, as well as Equinox and Epoch, refer to alternative ways of specifying coordinates; all should not be required, but only the ones specified in the resource being described. (d) In those same comments, we urged that Scale and Coordinates should only be required when they appear on the resource being described.

5.3.5. It is not clear that an instruction of recording optional elements is appropriate in a section dealing with required elements. If a definition of what RDA means by “optional” is needed, it should be at a high level along with the definition of what RDA means by “required”.

5.4.1. The principle behind this general instruction is not consistently pursued throughout RDA; specifically, see 6.2.0.5.1.

5.5. These instructions ought to be the same as those for recording titles of manifestations given in Chapter 1. ALA would like to see a connection made between titles of works and expressions and titles of manifestations, with a reference to the instructions in Chapter 1 for consistent recording conventions.

5.4–5.5. “Technical” instructions about data (what language to use, capitalization, initial articles, etc.) is most helpful at a high level in the code, such as an introductory chapter, or with the specific instructions where they apply; it is least helpful at an intermediate level, such as a section or chapter which is neither sufficiently general nor sufficiently specific. Given that such instructions in RDA apply to so many specific instructions, ALA prefers the more general approach and recommends that a set of general instructions based on 5.4–5.5 be included in an introductory chapter. Also, consider developing a formulaic, brief chart that could be displayed (but not stored) with all the specific instructions. This approach could be used for other highly general instructions, as well as for definitions of terms.

5.5.1.1. Conventions for referring to parts of elements is not consistent; in this case, the term “subdivision” is used. ALA did not find this particularly clear, but we are not sure what other term would be preferable.

ALA is not convinced that this instruction should be limited to titles of works; we prefer “titles of a work or expression”. [Note: This same comment applies at other instructions, including 5.5.2.1 and 5.5.5.1.]

5.5.1.1a.1. The instruction relating to the Arabic article seems to conflict with the instruction in 5.5.4.1 to omit initial articles. Does the Arabic case always fall under the exception in 5.5.4.1 (i.e., will the initial element always be a name)? If there is no contradiction, further explanation would appear called for.

5.5.1.1b.1. Do not restrict this instruction to corporate bodies; it should also apply to titles such as iTunes, WordPad, FileMaker Pro.

5.5.2.2. We believe that this instruction should be labeled as an exception.

5.5.4. Here and elsewhere, ALA believes that the instruction to omit the initial article is a simplistic solution that conceals the point of the instruction. If the objective is to support sorting on the element following the article, then the instruction should be to encode the title so that the initial article is not used in sorting. Omitting the article as instructed is only one way to accomplish this, and it supports the desired sorting at the expense of other functionality, such as display of the title as found.

5.6.3. There are occasions, such as this instruction, where “preferred” is omitted before “access point”; we suggest that consistent language be used. On the other hand, does “preferred access point” refer to the entire access point, including additions? Or are the additions added to the “preferred access point”? If the former, then we should probably say that information is added to the “preferred name” to form the “preferred access point”.

5.6.4. ALA is not convinced that the preferred access point for a part should routinely be based on the name of the whole work, particularly in the case of series access points. We agree that this should be done when the part is identified only by a general term (with or without a number) [see 6.2.6], but there is disagreement about whether this should be done in other cases.

► **5.7.2.** This instruction – and similar instructions elsewhere – tells the cataloguer to construct the variant access point for a work or expression using the preferred access point for person, family, or corporate body plus the variant title. This seems to exclude the possibility of a variant access point from the title alone. ALA believes that it is extremely important to have title alone as a variant access point. Furthermore, the instruction to use the same name in the variant access point as in the preferred access point could lead to an access point that gives the name in one language or script and the variant title in another language or script; this is not standard citation practice and can only lead to confusion among users. The variant access point **as a whole** should be constructed as if it were the preferred access point. See one specific proposal at 6.1.4.1.

5.8–5.10. These elements are not labeled as optional or required.

5.8.0.1. ALA notes a tendency to treat elements as technical objects, rather than concepts. For example, in this definition, we suggest deleting “an indication of”. And this definition drags on interminably. We suggest:

The **status of the preferred access point** is an indication of the level of establishment of the preferred access point ~~for the preferred form of name or title for the entity (e.g., provisional).~~

5.8.0.2. Delete; sources of information are not helpful for meta-metadata like this. And, if it is to have any meaning at all, the information must come from an **authoritative** source.

5.8.0.3.1. Remove the term “memorandum”; this has nothing to do with how the access point is formulated or its validity, but only with the way in which it is used in a particular database. This is administrative metadata and does not belong in RDA.

5.9. For the same reasons sub-elements are used elsewhere in RDA, break this data element into the following sub-elements: Source consulted, Information found in source, and Location within source.

5.9.0.2.1. ALA notes that the information recorded in this element can only be taken from the source consulted itself. Information from any source is a candidate to be recorded in this element, but when recording it, the information must be taken from the source cited. Perhaps these two points need to be made separately.

5.9.0.3.1. ALA notes that there are no instructions on how to cite a source consulted. A simple instruction based on the elements in chapter 2 should be added. At least the title proper and the date of publication should be included.

5.9.0.3.2. This instruction suggests that source information should be included *as data about data* in the recording of the elements in question. We think this suggestion should be pursued; in practice the information found (the other elements) needs to be associated with the sources consulted.

5.10. ALA would support a recommendation to change “Annotation” to “Note” throughout RDA. This is familiar terminology to cataloguers and is no more confusing than “Annotation” to any reader.

5.10.0.1. ALA notes that the stated audience for this element is other cataloguers. The intended audience of an element may need to be recorded as *data about data*, if we ever take up that issue.

We are not sure that such annotations should be limited to those directed to future cataloguers; often the information can be useful to catalogue users. We suggest changing the definition to: “information that might be helpful to those using or revising the preferred access point, or creating a preferred access point for a related work or expression”.

5.10.0.3. Change the caption to “Recording cataloguer’s annotation” to be consistent with the convention documenting other data elements in RDA.

5.10.0.3.1 and 5.10.0.3.2. The distinction between these two instructions is unnecessary. Add under 5.10.0.3.1 point e): “any other annotations that might be helpful” and delete 5.10.0.3.2.

Chapter 6

Treatment of series as work. ALA believes that the instructions relating to series, which are a type of work, are insufficient. We welcome suggestions from other constituencies to extend these instructions.

► **Missing element.** The element Title of the expression is missing. This is a vital element for identifying an expression. Given that the preferred title of the expression is based on the preferred title of the work and ignores the title of the expression, the title of the expression needs to be recorded as a variant and is worth defining as a separate element subtype.

6.0.1.1. Delete the footnotes. If the second sentence of footnote 1 is considered valuable, move it to 5.1.1.2.

6.0.2.1–6.0.2.3. Delete. These instructions already appear with the individual elements. A generalization here is not helpful.

6.0.2.2 [if retained], **6.2.0.2.2**, **6.2.2.1**, etc. It is not clear whether “modern sources” in the first sentence are synonymous with “modern reference sources” in the following sentence.

6.0.2.4. Delete. Add a compact “sources of information” instruction to each element.

► **6.1.** Given that access points that include the name of the creator assume a relationship between the creator and the work, a designation of role might usefully be associated with the name of the creator. Given that such designations are defined in a completely different context in Chapter 18, we are not sure how to bring that concept to bear in these instructions, but we believe it is important – and perhaps particularly important that the examples here include such designations.

► **6.1.1.** ALA notes that some issues will need to be revisited once a decision has been made about the status of the Originating Body category in Chapter 19 (old Chapter 6, at 6.3.2). If the concept of originating body is not retained, then the question of when a corporate body can be considered the creator of a work needs to be specified, either under the Creator element in Chapter 19 or in 6.1.1. In either case, the critical rules from AACR 21.1b1 need to be applied in order to determine whether to include the name of a corporate body in the access point for a work. In an online product, it may not matter particularly where those instructions are placed *so long as they are virtually present in both Chapter 19 and in 6.1.1*. In general, the relation between the instructions in these two chapters and how they need to be applied together in order to name a work should be made much clearer.

6.1.1.0.3, **6.1.4.3.1** and **6.1.1.7.1.** In an age of machine processing, “similar to” is a very dangerous concept. We suggest deleting phrases such as “or similar to” and “or very similar to” from instructions and leave the matter to cataloger judgment.

6.1.1.2.3 and **6.1.1.2.4.** These two instructions demonstrate that the approach to choosing a preferred access point for a work within RDA is not very principled. They present a different approach for moving images and for serials from that used for other collaborative works without providing any theoretical justification for the difference. ALA greatly misses the concept of mixed responsibility, and feels that this concept would provide a principled approach for moving-image resources. In the case of serials, it seems that responsibility for creation is always changing and generally applies only to part of the whole. In both cases, there are exceptions which ought to be treated as such and not carried along with comprehensive instructions. Similarly there are other works that share the characteristics (e.g., mixed responsibility) of these categories which ought to be treated the same way. Similar comments apply to the special instructions for musical, legal and religious works. ALA wishes that more work had been done defining the application of the concept of creation to these categories, rather than designating exceptional treatment based solely on membership in a type of resource class.

6.1.1.3.1. FRBR 3.3 speaks of “aggregate[s] of individual works”; ALA believes that this language is preferable to “compilation of works”.

6.1.1.3.1 and **6.1.1.3.3.** ALA believes that it will be impossible in practice to distinguish between compilers who are considered creators of an aggregate work and those who are not. That said, ALA is divided as to which instruction should be deleted. Some feel that all compilers should be treated as the creators of the aggregate work, while others prefer consider that the only

creators in an aggregate work are the creators on the individual contributions, and that the aggregate is a work without a named creator.

6.1.1.3.4. Make it clear that the instruction is to give the preferred access point for each work in the compilation; otherwise, it looks as if the instruction is to give a lot of access points, none of which is preferred.

Given that it may not be practical to give access points for each work in the compilation, ALA would like to see an alternative instruction that would allow construction of a devised title according to the instructions in Chapter 2.

6.1.1.4–6.1.1.5. Most of the instructions these sections are guidelines that help in determining whether two expressions are of the same work, rather than instructions for formulating access points for works. This should be explicit and the instructions should be moved out of 6.1.

► **6.1.1.4.** It is very confusing for adaptations and revisions to be lumped together; adaptation nearly always produces a new related work, while revision nearly always produces a new expression of the same work. Further confusion is created at 6.1.1.4.3 where the film of *Don Giovanni* is shown entered under title on the grounds that it is an adaptation, whereas 6.1.1.2.3 already says that *all* films, just by virtue of being films, are treated as new works entered under title – so the fact that it is also an adaptation should be irrelevant. ALA recommends that there be separate instructions for adaptations and revisions, indicating explicitly that adaptation nearly always produces a new work, and revision nearly always produces a new expression of the same work.

6.1.1.4.3. If the point of the phrase “commonly cited by title” is to characterize those adaptations that would be entered under title (to use AACR2 language), then ALA believes that the instruction is unnecessary, as 6.1.1.4.1b already covers that situation.

► **6.1.1.4.4 and 6.1.1.5.3.** FRBR would suggest that any expression can be named, even if there is only one expression of a given work. RDA seems to suggest that there are cases in which it is not appropriate to name the expression. We note, however, that these two instructions do not exhaust the relevant cases. Furthermore, the instructions do not address the cases in which the access point may in fact identify a group of expressions, e.g., when the access point for a translation names the language but not the translator. RDA seems to be carrying forward AACR2’s pre-FRBR view of the use of access points for works and expressions, but without having a clear rationale and without covering all the relevant situations.

► **6.1.1.5.** The implications of the recently-published revisions to FRBR need to be taken into account. The question of “augmentations” is particularly difficult in the case of videorecordings, which are often issued with extensive bonus features of this sort. Some clarification and/or examples would be helpful. We observe that some bonus items on a videorecording seem to be new expressions of the preexisting film (commentary tracks, alternate sound tracks, variant cuts), some are separate works (substantial documentaries, unrelated films, etc.), and some are merely supplementary materials, often without individual titles (some making-of-documentaries, cast interviews, photo galleries). Decisions on these materials may need to be made of a case by case basis exercising cataloger judgment, but all these different options will be needed.

6.1.1.6.3. There *seems* to be a contradiction between the third example here and the instruction in 6.1.1.3.4 not to make up a collective title.

6.1.1.7.1. Make the wording consistent with 5.3.3 by adding “as necessary to differentiate it from other access points”.

► **6.1.2.2.** ALA is not convinced that naming parts subordinately to the name for the whole work is an improvement or simplification. We do not see this as a particularly important matter; if both ways of naming the work are given, it does not matter that much which is treated as the preferred access point and which the variant. However, we lean towards using the simpler form in the preferred access point – as is the current AACR practice for all except musical works.

► **6.1.2.3.3.** RDA offers the following choice for resources containing two or more parts of a work: either create an access point for each part or, alternatively, assign the access point for the work. ALA strongly disagrees with the alternative; assigning the access point for the complete work to an incomplete work is a misrepresentation and a major disservice to users of the catalogue. ALA strongly recommends that this alternative be deleted. On the other hand, ALA recognizes that there needs to be an alternative to the instruction to create access points for each part. We support the provision of an alternative that would identify incomplete expressions of a work as such in the access point for such expressions. We suspect that means reinstating the instruction to add “Selections” to the access point for the work; “incomplete” might be more accurate, but “Selections” is the current convention.

6.1.3.1. ALA suggests that the wording here should be made consistent with that at 5.3.3 by adding “as necessary to differentiate it from other access points”.

We also suggest adding to the list the name of a principal contributor to the realization of the expression, e.g., a translator or performer. Such names are often needed to differentiate expressions of the same work. On the other hand, this case could also be treated as a *relationship* to the person, family, or corporate body in question.

If our recommendation concerning the identification of incomplete expressions is accepted, add *Selections* to the list.

6.1.4.1. At 5.7.2 above, ALA recommended that these instructions allow a variant access point for a title alone. For this particular case, we propose the following additional instruction, probably following the current 6.1.4.2:

If the preferred access point has been constructed using the preferred access point for a person, family, or corporate body followed by the preferred title for the work, construct a variant access point using only the preferred title for the work.

Mother animal series

(Preferred access point for the work: Hurd, Edith Thacher, 1910-1997. Mother animal series)

Catalogue of Roman portraits in the British Museum

(Preferred access point for the work: British Museum. Catalogue of Roman portraits in the British Museum)

Historic scientific instruments of the Adler Planetarium & Astronomy Museum

(Preferred access point for the work: Adler Planetarium & Astronomy Museum. Historic scientific instruments of the Adler Planetarium & Astronomy Museum)

Catalogues of the collections of the National Museum in Cracow. New series

(*Preferred access point for the work:* Muzeum Narodowe w Krakowie. Catalogues of the collections of the National Museum in Cracow. New series)

6.1.4.1.3. The instruction referred to (6.1.1.7) seems to be restricted to resolving a conflict between works with the same title; the same restriction should apply here.

6.1.4.3.1. The reference to 6.2.7 covers all group 2 entities; change “person” to “person, family, or corporate body”.

6.2.0.1. See comment at 5.1.2.3.

6.2.0.2. These instructions duplicate 6.0.2 *verbatim*. They need not appear in both places.

6.2.0.2.2, 6.2.2.1, etc. See comment at 6.0.2.2.

6.2.0.3.2. “For instructions on choosing ...” should be “For additional instructions on choosing ...” Some of the instructions in 6.2 do apply to these special types of works as well.

6.2.0.5. ALA would like to see the instructions on transliteration consolidated at a high level in RDA, rather than being stated for specific elements or groups of elements. We would like to avoid the possibility of deviation among these instructions. We note that this particular instruction is stated categorically, and does not seem to allow for the option of recording a preferred title in more than one script (presumably in separate authority or work records, which perhaps should also be stated explicitly).

6.2.0.5.1. These instructions (and similar instructions referencing preferred language or script should recognize that an agency may have more than one preferred language or script. Wording such as “in a language/script other than a language/script preferred by the agency creating the data” should be used.

6.2.1. ALA suggests that there should be some explanation why 1500 was chosen and why this distinction matters when naming works.

6.2.1.1.1. Preferring a title in the original language (without even a fallback on using a title in the language of the agency) doesn’t follow the stated principles of RDA. This is an example of the conflict of principles noted above at 5.2.5–5.2.6.

6.2.1.3.1. See the General comment on “first received” above.

6.2.2. It appears that these instructions are not applicable to non-textual works such as Gregorian chant or medieval art works. We suggest renaming as “Textual works created before 1501.”

6.2.2.1.1. We suggest adding a reference here to 6.23.1.5 (guidelines for ancient laws, etc., i.e., certain works created before 1501) – or merging 6.23.1.5 into 6.2.2.1.1.

6.2.2.2.1. Note that this instruction does not mention “English titles” yet 6.2.2.2.2 deals with cases in which there is no English title. We propose changing 6.2.2.2.2 (see below)

6.2.2.2.2 and 6.2.2.2.3. For consistency with other instructions, “English title” should be changed to “title in the language preferred by the agency creating the data”.

6.2.2.3.1. Although we realize that these instructions were carried forward from AACR2, ALA is not convinced that they are needed, and would be comfortable applying the general instructions to these works. If retained, the instruction should say either “If the original title ... is written ...” or “If the original language ... is ~~written~~ neither ~~in~~ Greek nor ~~in~~ ...” (languages are not *written in* Greek, but titles are) – although we wonder whether it is the language of the title only or the language of the text (expression) that should determine whether this instruction applies.

► **6.2.4.1.** One of our experts on cataloging manuscripts argues that the instructions on preferred titles for manuscripts are **not** intended to deal with the **work** contained in the manuscript, but rather for the manuscript as an **item** or as an object, independent of the works it contains. For example, “Codex Amiatinus” does **not** represent the work contained in that manuscript (which is a Latin text of the Bible), but for the manuscript itself – and, as such, is used primarily to indicate a subject relationship. The preferred title for the **work(s)** contained in the manuscript, on the other hand, should be formulated consistently with the general instructions for naming works. This instruction should be deleted – or, preferably, moved to a section dealing with preferred titles for items, and the text of the instruction should make it clear that what is being named is the “manuscript or manuscript group”.

► **6.2.5.1.** First, the term “incunable” is now more common in English than “incunabulum”. Second, one of our experts on cataloging such resources indicates that the AACR2 rule that is the basis for this instruction (25.14A) dealt with creating a uniform title for the incunable, **not** for the work contained in the incunable; in other words, this instruction properly deals with creating a preferred title for the manifestation (or item), not the work. An instruction on naming **works** created before 1501 already exists at 6.2.2. We suggest that the instructions at 6.2.5.1 be deleted – or perhaps moved to a section on naming manifestations or items (along with the comparable instructions for naming individual manuscripts; see 6.2.4.1 above).

► **6.2.6.2.1.** This instruction is confusing because it considers the title of the part to be the preferred title, whereas the preferred access point for the part is formulated by adding the preferred title of the part to the preferred title of the larger work (but see our comment at 5.6.4). We believe that the best way to avoid this confusion is to consider the preferred title of the part to consist of the title of the larger work plus the title of the part, and to consider the title of the part alone as a variant title of the work.

6.2.6.2.2. ALA suggests two additions to these instructions: (1) There should be a *consistency* instruction: “Follow the pattern already established for other parts of the same work.” (2) Title and number may not be sufficient to identify the part. For example, many television and radio program episodes can only be identified by their broadcast date. Allow other information to be used to designate a part.

6.2.7.1. To be extra clear here, change to: “For a work that is a compilation of works, ...”.

6.2.7.2. ALA believes that there should be instructions under 6.3 for recording the title proper of a compilation as a variant title for the compilation, and that there should be a reference to those instructions here.

6.2.7.2.1. The music exception should be a separately-numbered instruction. Embedding a reference instead of stating an exception should be a violation of editorial policy.

6.2.7.2.1 or 6.2.7.2.2. We suggest adding “Diaries” either to the list in 6.2.7.2.1 or to the examples in 6.2.7.2.2.

6.2.7.2.3. Given that the reference is to the immediately succeeding instruction, we see no virtue in making the reference. Consider adding this to the editorial guidelines.

6.2.7.3.1. At 6.1.2.3.3, ALA recommended that “Selections” be added to the heading for a work to identify an incomplete expression of that work. In the case of compilations, ALA also supports the identification of incomplete compilations. However, we do not see that “Selected correspondence” is sufficient improvement over “Correspondence. Selections” to warrant the change from current practice.

6.2.7.3.1. ALA suggests the following simplification: “For a compilation consisting of two or more but not all the works of one person, family, or corporate body, record one of the following collective titles:”.

6.2.7.3.2. ALA does not see the creation of separate analytic access points as an *alternative* to using the preferred title for the compilation. One may choose to do both.

6.3.0.1.1. The definition can be simplified: “A **variant title** is a title other than the preferred title.”

6.3.0.3. ALA recommends that these instructions include title variations that are the result of the cataloger’s manipulation of a title, e.g., spelling out numbers, replacing symbols with words.

6.3.0.3. ALA suggests that two additional instructions are needed. First, footnote 4 should be an instruction: “Record as a variant title a title other than the preferred title appearing on a manifestation of the work.” Second, there should be a general enabling instruction based on the scope of the element: “Record as a variant title any other title by which the work is known.”

6.3.0.3.4. ALA suggests the following replacement text: “Follow the additional specific instructions given under 6.3.1–6.3.2 as applicable.” The reference to “preceding sections of the chapter, as applicable” is imprecise and unhelpful; these instructions should be included explicitly in the reference.

6.3.1 and 6.3.2 ALA sees no justification for distinguishing alternative linguistic variations from other variations. Appropriate captions preceding the examples should make the categories sufficiently clear. We certainly do not see Alternative Linguistic Form of Title as a formally-defined element sub-type.

6.3.1.1.1 and 6.35.1.1.1. These instructions should specifically include different translations into the same language.

6.3.1.3.1 and 6.35.1.3.1. ALA suggests rewording for consistency with other instructions: “Record as a variant title a variant linguistic form of the preferred title.”

► **6.4.** ALA would like clarification on the distinction between this element and Content Type (6.11) and the relation of both to the Content Type element that was formerly included in the draft of the old Chapter 4. Presumably, Form of Work is needed to record this information as an attribute of the work and also to provide qualifiers to access points for works. Similarly, there needs to be a corresponding element to record this information about expression and to provide

qualifiers to access points for expressions. We feel that the Content Type element, carried forward from the old Chapter 4, does not exactly equate to either of these elements. As noted at 6.11 below, the list contains many terms that relate to the work in whole or in part. We suggest that the Content Type list (and perhaps the RDA/ONIX Framework on which it is based) needs to be reanalyzed with the work/expression distinction in mind, and that Type of expression should be more closely related to the FRBR Form of Expression attribute.

6.5. Technically, this element and its sub-types are attributes of relationships.

Since dates are chronological information, the phrase “earliest date” is clearer and more meaningful than “first date”.

ALA also recommends that the provision of multiple dates be allowed for continuing resources. Such date ranges are used as qualifiers for corporate body names and would be much more meaningful than a single date. For example,

Amalgamated Conglomerate Corporation. Annual report (1960–1987)

6.5.0.1 and 6.5.1.1. The distinction between Date of work and Date of creation is not at all clear. It is difficult to understand how the “first date ... associated with the work” (definition of Date of work) would not be the date of creation.

6.5.1.1.1. For legal materials, the date most commonly associated with a work is the date of promulgation or enactment. From this definition, it is not clear that such a date falls within the scope of this element. We recommend an additional provision that clarifies that Date of creation includes date of promulgation or enactment of legal works. Alternatively, define Date of promulgation/enactment as a separate element sub-type.

6.5.2. ALA suggests that Date of earliest manifestation is closer to the concept intended here.

One ALA respondent suggested that RDA needed to recognize that some attributes are “computed” based on what data exists in the database against which one is cataloguing. For example, Date of first publication or release is conceptually computed based on the data attributes that exist in applicable manifestations. Other instructions that reference predominance could also be computed in this way.

6.5.2.1. ALA suggests that coverage date would be preferable to the publication date. For instance, a yearbook for 2006 published in 2007 should have the date 2006 in the preferred title, instead of the date 2007; a statistical report covering 1980 published in 1984 should have the date 1980 in the preferred title, instead of the date 1984. We suggest that Date of coverage be defined as a new element sub-type.

6.5.2.3.1. ALA points to the first two examples as an illustration of the need for a discussion of the maintenance of data in RDA: when is it necessary to modify an existing description or access point when new information appears or a conflict arises? Among other things, this suggests that attributes should be recorded even if not currently needed to resolve conflicts in order that the information be available to deal with future needs.

6.8.0.3.1. This instruction is an example of the constant tension between recording and displaying information. It is a good idea to record the information in a standard way (although we note that ISO 639-2 gives one or two codes for each language, as well as the name in both English and French – which scarcely suggests a consistent recording standard). On the other

hand, we see no reason why this information should not be recorded and displayed (as with so many other elements) in the manner preferred by the agency creating the data.

6.9.0.3.2. ALA recommends deleting this instruction. The temptation to record the same information in more than one place will be overwhelming and certainly should not be encouraged.

6.10. ALA supports requiring identifiers.

6.10.0.1. Identifiers don't have to be numbers or codes. Dublin Core has a much better definition of identifier: "An unambiguous reference to the resource within a given context."

6.10.0.3 and 6.16.0.3. ALA feels strongly that any identifier needs to include the *namespace* to which it belongs. An LCCN or any other number alone means nothing. It doesn't really matter whether there is a prescribed format for the identifier, you still have to identify what it is. This same issue arises in all the instructions where identifiers are mentioned.

► **6.11.** Assuming that this is the element that was included in the former draft of Chapter 4, we are not sure that it should be placed here as an attribute of the expression. We note that many of the content types are in fact attributes of the work, e.g., computer program, moving image; others are combinations of a word identifying type of work and a word identifying type of expression, e.g., tactile image. As with other elements in this chapter, Content Type serves two functions: it records information about a work or expression, and it may be included in an access point to differentiate works or expressions. To serve both functions, it would seem to be necessary to separate work- and expression-related terms. This would certainly be true for a scenario #1 implementation.

6.11.0.3.1. This element is required; given the instruction to record as many terms as are applicable, it should be clear whether the requirement is to record at least one term or to record all applicable terms.

6.11.0.3.2. ALA once again points out that the term "image" in the context of cartographic resources means "remote-sensing image"; we again recommend that we use the term "graphic" instead.

6.11.0.3.2, "moving image". ALA questions whether video games should be considered as moving images rather than computer programs.

6.11.0.3.3. ALA strongly recommends that the use of commonly-used terms be allowed when none of the terms in the list applies.

6.12. As with Date of work (6.5), we find it difficult to imagine that the date of the expression would be known independently of the date of the earliest manifestation of the expression. At the least, ALA suggests that the element sub-type for Date of earliest manifestation (see our comment at 6.5.2) be added.

6.12.0.1. ALA suggests that we avoid the work "created" when defining attributes of an expression. We suggest "The date of the expression is the date the expression was realized."

6.12.0.3.1. ALA continues to prefer use of "C.E." and "B.C.E." Furthermore, we suggest that the instruction to use the Gregorian calendar is a gross oversimplification. We would like

consideration given to allowing other calendars to be used (and to be identified as part of the description).

6.13. There was some confusion here about what is being recorded in this element. Some respondents thought that this might be where one recorded the language(s) present in the resource being described – which we believe is more appropriately an attribute of the manifestation. Others were concerned about the (possible) requirement to make an access point for each language expression contained in the resource; this misconception was created by the misplacement of 6.13.6 in this element (see below). It needs to be understood that this element properly is used to record the language(s) of a single expression, once the cataloger has decided to describe that expression in an authority record (scenario #2) or an expression record (scenario #1). It is particularly difficult for readers of RDA to understand this when language relating to access points keeps appearing in instructions supposedly dealing with attributes of a work or expression.

6.13.0.5.1. Although explicit instructions about translations is helpful, we would point out that, when describing a translation, the language recorded in applying 6.13.0.3.1 *is* the language of the translation. In other words, we wonder whether this instruction is needed. The way that 6.13.0.5.1 is stated, it implies that one would *not* record the language for an expression in the original language — which might be true in the access point, but not here in the description of a specific expression.

6.13.0.5.2. ALA would like to see explicit instructions regarding subtitles for motion pictures. If these qualify as distinct expressions, then we suggest that the name of the language needs to be followed by the term “subtitles” to clarify the nature of the expression. If this element applies only to full expressions (i.e., the entire motion picture, not just the spoken dialogue), this should be made clear somehow. In general, ALA does not believe that it is appropriate to apply this element to subtitles.

6.13.0.6. This instruction deals with the use of this element in constructing access points for expressions; as such it belongs in 6.1.3, not here. This element presumably records the language for an individual expression of a work; the languages of other expressions would be recorded as part of the description of those expressions. With regard to the provision of access points for each expression contained in the resource, ALA applauds the avoidance of “multilingual” or “polyglot”. However, we are concerned about the impact of making multiple analytical access points for different expressions. We would like to see a clear indication that such access points for every expression contained in the resource are not required.

6.14.0.1. Limit the scope of this element to information not captured in another data element; we don’t need “English ed.” when we have already given English as the language. The examples in the sentence are not helpful; change or delete. Change the definition to: “a designation for a specific realization of a work not recorded in another data element”. All the examples 6.14.0.3.1 except the numbered versions are covered under other data elements, so delete them.

6.15. Animation as a technique is not at the expression level. If a film is animated, all expressions of that moving image work are animated. The same is true of the other examples given in 6.15.0.1.1. This element belongs at the work level, not the expression level.

6.16. ALA supports requiring identifiers.

6.17–6.22. The comments on the instructions for musical works and expressions below supplement the ALA response to 5JSC/LC/12. Included below are references to the instructions covered by the ALA response to the LC proposal, and serves as a concordance (in order by the instruction numbers in the draft) to 5JSC/LC/12.

6.17.1.2c. For rewording proposal, see the ALA response to 5JSC/LC/12 (*D.5. RDA 6.17.1.2.3*)

6.17.1.5.1. For rewording proposal, see the ALA response to 5JSC/LC/12 (*D.8. New RDA 6.17.1.3*)

6.17.1.5.2. For rewording proposal, see the ALA response to 5JSC/LC/12 (*D.8. New RDA 6.17.1.3*)

6.17.1.5.4. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*D.8. New RDA 6.17.1.3*)

6.17.1.5.5. For rewording proposal, see the ALA response to 5JSC/LC/12 (*D.8. New RDA 6.17.1.3*)

6.17.1.6. For rewording proposal, see the ALA response to 5JSC/LC/12 (*D.11.*)

6.17.1.7. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*E.2. RDA 6.17.2.2.3*)

6.17.1.9. For rewording proposal, see the ALA response to 5JSC/LC/12 (*E.1. RDA 6.17.2.2.2*)

6.17.1.10.1. ALA recommends reinstating AACR2 25.27A1 footnote 10, which defines “type of composition.” For additional comments on this instruction, see the ALA response to 5JSC/LC/12 (*H.1. RDA 6.18.0 and K.1. RDA 6.20.0.3*)

6.17.1.12.1. ALA recommends adding a reference back to 6.17.1.10.2 along with slight rewording of the instruction as follows:

Add to the access point for a compilation containing works of one type, the medium of performance, unless the medium is ~~obvious~~ implied by the title (see 6.17.1.10.2a) or unless the works are for various media.

6.17.3.1.1. For rewording proposal, see the ALA response to 5JSC/LC/12 (*F.3. RDA 6.17.3.2*)

6.17.3.1.2. ALA observes that such preferred access points for arrangements may encompass more than one expression (e.g., a single work arranged for string quartet, arranged for chamber orchestra, arranged for piano solo, etc.). For additional comments on this instruction, see the ALA response to 5JSC/LC/12 (*F.1. RDA 6.17.3*)

6.17.3.3. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*F.6. RDA 6.17.3.5*)

6.17.3.5. ALA observes that instructions related to librettos appear twice in the “musical works” instructions, once as part of naming works (6.17.1.9) and once as part of identifying an expression (6.17.3.5). We recommend retaining only 6.17.1.9.2 and 6.17.1.9.3 under the “musical works” instructions, and moving 6.17.1.9.1 to 6.17.3.5 under the instructions for identifying an expression. We further recommend changing the phrase in 6.17.3.5.1 “... text of

an opera, operetta, oratorio, or the like ...” with “... the text of an opera, operetta, oratorio, or other dramatic musical work ...”

For further comments on this instruction, see the ALA response to 5JSC/LC/12 (*E.1. RDA 6.17.2.2.2*)

6.17.3.6.2. ALA requests clarification about the concept of “language expressions” and how this relates to selecting the preferred access point for resources containing the work in two or more languages. Our concerns in this section also apply to the more general instructions for translations in 6.13.

6.18.0.3.1. The instruction to use the composer’s original title in the language in which it was presented conflicts with 6.18.0.2.1, which says to determine the preferred title based on resources embodying the work or reference sources. There is a similar conflict with 6.18.0.2.2, which says to determine the preferred title from modern sources. ALA recommends revising the instructions in 6.18.0.2 to conform to the more specific instructions here.

6.18.0.3b point b). For comments on this instruction, see the ALA response to 5JSC/LC/12 (*H.1. RDA 6.18.0*)

6.18.0.4.3. Both 6.18.0.4 and 6.18.1 have the caption “Recording the preferred title.” ALA recommends making a distinction between these two captions. For additional comments on this instruction, see the ALA response to 5JSC/LC/12 (*H.1. RDA 6.18.0*)

6.18.4.2e.1. This instruction, which does not have a parallel in the earlier sections of this chapter, could benefit from some rephrasing. ALA recommends breaking it into subsections relating to the preferred title for smaller parts: 1) including the name of the larger part when it has a distinctive title 2) not including the name of the larger part when it does not have a distinctive title, except: 3) including the name of the larger part without a distinctive title when it is needed to put the smaller part in the correct context (the Verdi prelude to Act 3 of *Traviata* falls into this category). Should RDA extend this concept to the earlier instructions about constructing access points for one part in 6.1.2.2?

6.18.5.1.1. ALA recommends making a distinction for compilations of works for individuals who have written both musical and literary works, based on the current text of the LC rule interpretation for 25.10A. We propose the following text, although its placement within the RDA instructions is not clear.

Composers and Writers

If a person has written both musical and literary works, apply the following:

- 1) If the person is primarily a composer, use the preferred title “Literary works” for compilations containing the complete literary works. For a compilation consisting of two or more literary works in a particular form, see 6.2.7.3.1. For a compilation that consists of two or more literary works in various forms, use “Selected literary works” as the preferred title.
- 2) If the person is primarily a writer, use the preferred title “Musical works” for compilations containing the complete musical works. For a compilation consisting of two or more musical works in one broad or specific medium or type, see 6.18.5.2 and 6.18.5.3. For a compilation that consists of two or more musical works in various forms or for various media, use “Selected musical works” as the preferred title.

6.18.5.2.1. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*C.1. RDA 6.2.7.3*)

6.18.5.5.1. ALA expresses concern about the loss of AACR2 25.34C3 in relation to creating a preferred title for incomplete compilations in a specific medium, especially since similar instructions from AACR2 appear in 6.2.7.3.1.

For additional comments regarding use of “Selected ...” vs. “Selections,” see the ALA response to 5JSC/LC/12 (*C.1. RDA 6.2.7.3*)

6.19.1.3.1. Editorial: ALA recommends that this instruction use the same wording as in 6.3.1.3.1.

6.20.0.1.1. ALA proposes the following substitute language for this instruction:

Medium of performance is a term or phrase indicating the instruments, voices, etc. for which a musical work was originally conceived.

6.20.0.3.1. ALA requests clarification about what is meant by “...except as instructed under b) below.” Should this refer to 6.20.0.5.3 instead?

For additional comments on this instruction, see the ALA response to 5JSC/LC/12 (*K.1. RDA 6.20.0.3*)

6.20.0.5.1. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*K.4. RDA 6.20.0.7*)

6.20.0.6.3. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*K.3. RDA 6.20.0.6*)

6.20.0.12.1. As written, this instruction appears to call for all instruments to be named singly in the medium statement. If the intent is to continue the AACR2 practice that allows terms naming groups of instruments, this practice needs to be specified. The JSC’s decision about whether or not to remove the “rule of three” for medium of performance statements may have a bearing on this instruction.

► **6.20.0.13.1.** A critical “not” is missing from this instruction as carried over from AACR2 25.30B11. The instruction should read “Do not record ...” instead of “Do record ...”

6.21. ALA recommends changing the name of this element to “Numeric designation for a musical work.” The current name could easily be confused with numbering for continuing resources.

6.21.0.3.1. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*L.1. RDA 6.21.0.3*)

6.22.0.2. For comments on this instruction, see the ALA response to 5JSC/LC/12 (*M. RDA 6.22*)

6.22.0.2.1. This instruction, new in RDA, says to “take information on key from any source.” However, in 6.22.0.3b.1, the key is to be recorded only “if it is stated prominently in the resource being catalogued.” ALA recommends rephrasing the instruction here to eliminate this conflict.

6.23.1.5.1. Consider giving a reference here to 6.2.2.1 (Works created before 1501).

6.23.1.12.2 and 6.23.1.13.2. ALA recommends the following revision for clarity:

For amendments to these documents, use the same preferred access point as the preferred access point for any amendments to such a document.

6.23.1.14.1. We note that the application of this instruction is often different depending on whether one interprets “named first” as named first in the text of the treaty or named first in the title of the resource(s) on which the access point is based. We request that this matter be clarified. We recommend: “the preferred access point for the government named first in ~~resources embodying the work~~ the treaty or in reference sources.” Note: This comment applies wherever this phrase appears in RDA.

6.23.1.14–6.23.1.16. ALA tentatively suggests that consideration be given to generalizing the instructions on treaties, by changing the caption at 6.23.1.14 to “Treaties, etc., between governments and other intergovernmental bodies” and combining all the instructions from 6.23.1.14 through 6.23.1.16 into a single set of instructions. We don’t think that 6.23.1.17 can be covered here, but it might be combined with 6.1.1.2.

6.23.1.19b.1 point b). The reference should be to 6.24.2.2.

6.23.1.20. Based on recommendations from the American Association of Law Libraries (AALL), ALA believes that the instructions for court reports are in need of revision. They reflect historical practice that would be very difficult for contemporary catalogers to follow, since it requires knowledge of the “accepted legal citation practice in the country where the court is located.” Whether or not the reports are issued by or under the authority of the court is also difficult to determine (the same publisher may be authorized in some years and not authorized in other years). We believe that the court should always be the primary access point, since reports are the decisions of the court, and the decisions are created by the court. AALL made this recommendation in response to the call in 2005 for revision to the rules for special materials in Chapter 21 of AACR2. We propose the following substitution for the current 6.23.1.20 (the remainder of the instruction would be deleted):

6.23.1.20 Reports of one court

- 6.23.1.20.1 ➤ For law reports of one court, construct the preferred access point representing the work ~~as instructed below~~ by combining:
- a) the preferred access point for the court, formulated according to the instructions given under [11.1.1](#)
 - b) the preferred title for the reports, formulated according to the instructions given under [6.24](#).

On the other hand, ALA is sympathetic to the significance of this change and would support a decision to retain the instructions in the current draft and revisit the issue after the initial release of RDA.

6.23.1.24a.1 and 6.23.1.29a.1. Parties to a legal action may be either persons or corporate bodies. ALA recommends that these instructions be changed to end: “... formulated according to the instructions given under [9.1.1](#) or [11.1.1](#), as applicable.”

6.23.1.28.1. This instruction is limited to judicial opinions *other than* the judgment of the court. ALA recommends that the instruction be clarified:

For an opinion of a judge that is not also the judgement of the court, construct the preferred access point . . .

6.24. ALA regrets the use of “etc.” in the collective titles “Laws, etc.,” “Treaties, etc.,” and “Protocols, etc.” However, we can neither suggest an alternative nor accept deletion of the “etc.” Furthermore, ALA is divided on the need for such collective titles. Therefore, we concur with the Library of Congress’s recommendation to leave these instructions in RDA and revisit the question after the initial release of RDA.

6.24.1.1a.1, etc. ALA does note that the instructions specify a particular English phrase without allowing an alternative. We suggest that “or an equivalent phrase in the language preferred by the agency creating the data” be added in each case. This seems to be in the spirit of the changes made to other instructions to facilitate international applicability of RDA instructions.

6.24.0.4.1 and 6.25.0.3.1. The references should include 5.4, which provides relevant guidance on recording titles with regard to script and language: “. . . following the general guidelines on recording titles for works given under 5.4 and 5.5.”

6.25.0.3.2, footnote 27 and 6.35.0.3.2, footnote 41. ALA questions whether these are appropriate places to remind catalogers to provide an access point for the title proper.

6.26.1. Some respondents felt that the term “promulgation” required definition. If the JSC agrees, we offer the following definition, from *Black’s Law Dictionary*:

Promulgation. The official publication of a new law or regulation, by which it is put into effect.

6.28.1.3. In the cover letter, advice was requested on whether the distinction between one and more than one body should be retained in 6.28.1.3. In July 2005, when the JSC asked for consideration of all the special rules for religious headings, the American Theological Library Association held extensive discussions. Their consensus was to enter all creeds, confessions of faith, etc. under preferred title. The instruction as written is very problematic. Instead of cataloging the work as presented in the item in hand, the instruction requires the cataloger to do research to determine if the work is accepted by more than one denomination. The instruction also results in changing uniform titles and main entries as denominations change. When a creed composed and accepted by one body is later also endorsed by another denomination, the access point must change to the preferred title, because entry for the second denomination is problematic. A confession of faith is accepted by several denominations, which later merge to form one denomination, requiring the access point to change to the new denomination. All of this complexity and reconsideration of decisions could be avoided if the access point were always the preferred title. We propose:

- 6.28.1.3.1 ➤ For a theological creed, confession of faith, etc., ~~accepted by more than one church or denominational body~~, construct the preferred access point representing the work using the preferred title for the work, formulated according to the instructions given under [6.29](#).

Nicene Creed

(Preferred access point representing the work for: I believe : the Nicene Creed / illustrated by Pauline Baynes)

- 6.28.1.3.2 ➤ ~~If a theological creed, confession of faith, etc., is accepted by only one church or denominational body, construct the preferred access point representing the work by combining (in this order):~~
- ~~—a) the preferred access point for that body, formulated according to the instructions given under [11.1.1](#)~~
 - ~~—b) the preferred title for the creed, etc., formulated according to the instructions given under [6.29](#).~~

Augsburg Confession

(Preferred access point representing the work for: The Augsburg Confession / translated by Richard Taverner ; edited for the use of the Joint Committee of the General Council, the General Synod, and the United Synod of the South by Henry E. Jacobs)

6.28.3. ALA suggests that it would be useful to generalize these instructions to include all sacred scriptures. One respondent indicated that his institution has had to adapt these instructions to cover the Book of Mormon and its various expressions, and notes that this work has all the characteristics of the Bible (complex publication history, multiple expressions in innumerable languages, facsimile reproductions, etc.); it is surely not unique among non-Biblical sacred scriptures in this regard.

6.28.3.1.1 and 6.28.3.4.1. We note for the record the differences in punctuation of additions to the preferred access point in the examples following these two instructions. If this difference is being carried forward from AACR2, ALA suggests that the introduction of some consistency might come be unwelcome.

6.29.1.1. ALA suggests that the basic instruction to choose a title in the language preferred by the agency creating the data, and using sources in the language preferred by that agency, be included in this instruction:

Choose as the preferred title for a sacred scripture the title by which it is most commonly identified in reference sources in the language preferred by the agency creating the data that deal with the religious group(s) to which the scripture belongs. Choose a title in the language preferred by the agency creating the data. If no such source is available, use general reference sources.

6.29.2.1. We note that 6.29 is not restricted to religious works in the Christian tradition; however, we are unaware of any sacred scriptures termed “apocryphal” outside of the Christian tradition. Therefore, we suggest the following addition to make this clear.

Choose the title commonly found in sources in the language preferred by the agency creating the data as the preferred title for an apocryphal book (i.e., one in the Biblical tradition included neither in the Catholic canon nor in the Protestant Apocrypha).

We would also like to see the distinction between Apocryphal books (6.29.2) and the Old Testament Apocrypha (6.29.7.4) made explicit through references and language describing the difference. One respondent suggested that “Apocrypha” be treated as the preferred title of the group of writings that are the subject of 6.29.7.4, but that the writings referred to in 6.29.2 be characterized only as “non-canonical” (with appropriate identification of the canons from which they have been excluded).

6.29.5.2.1. We suggest using the *New Catholic Encyclopedia* as the preferred source for titles of Catholic liturgical works; this is comparable to the instruction at 6.29.6.1 to use the *Encyclopedia Judaica* as the preferred source for Jewish liturgical works.

6.29.7.2.3. Two suggestions relating to book and chapter numbers were offered by ALA respondents: (1) Use roman numerals for both chapter and verse numbers, separating the chapter from the verse number by a colon; this is consistent with at least one tradition of citing Biblical passages, and is easier for a computer to parse. (2) Chapter and verse numbers should be treated consistently with other parts of works, i.e., separate them from the name of the book by a full stop, not a comma, in the examples. [Note that the examples do not follow the instruction to use a comma following the title of the book].

6.29.7.4. It was our impression that (pursuant to 5JSC/LC/8) “Apocrypha” was to be treated the same way as “Old Testament” and “New Testament” – i.e., it was not to be interposed between “Bible” and the name of the individual book. This instruction ought to read:

For an individual book use the name of the book as a ~~further~~ subdivision of the preferred title for the Bible.

6.29.7.7 and 6.29.8.3.1. See our recommendation at 6.1.2.3 that “Selections” be added to the access point for a work to identify an incomplete expression of that work.

6.29.17. ALA endorses the addition of instructions for parts of other sacred scriptures. However, there should be a provision such as at 6.29.7.5 for single selections that are commonly identified by their own titles. An example from the Book of Mormon would be: Allegory of Zenos (see name authority record LCCN nr 00028928).

6.30.1.1.1. This instruction should specifically include titles of different translations into the same language. See comment at 6.3.1.1.1.

6.30.1.3.1. Wording differs slightly from similar instruction at 6.3.1.3.1; we prefer the wording at 6.3.1.3.1:

If the title recorded as the preferred title for a work has ~~an~~ one or more alternative linguistic form(s) forms, record ~~the alternative linguistic form(s)~~ them as a variant title(s) titles.

6.31.0.3. We believe that there is no compelling reason to limit the guidelines in 6.31.0.4 to the Bible and parts of the Bible; if applicable, they could be extremely useful for all sacred scriptures.

6.31.0.4.1 and 6.31.0.4.2. We question whether the numerical limitations in these instructions are appropriate. In the case of number of languages, this would only apply to a single expression in three or more languages (each expression present in a manifestation being treated separately); we see no reason not to give the version in such a case. Similarly, in the case of translators, the limitation to record only one or two names seems arbitrary.

6.32.0.4. There seems to be no reason to limit these guidelines to the Bible and parts of the Bible. The alternative seems a reasonable addition to the general instructions on date of expression (6.12); if this were done, 6.32 would not be required at all.

6.35.1.1.1. For consistency, revise the final clause to read: “... form chosen as the preferred title.”

6.35.1.3.1. See recommended wording at 6.3.1.3.1.

Chapter 8

8.1.1. ALA suggests expanding the definition of person to include real and imaginary persons and non-human persons (such as animal characters).

8.2.1d. ALA understands why the fact that “a particular name, or form of name, has been recorded as a preferred or variant name” is important to catalogers, but questions whether this is necessarily something we’re trying to convey to catalogue users. Perhaps it should be explicit what category of users a particular objective is designed support.

8.2.3. ALA suggests that a principle of Collocation is closely allied with the principle of Differentiation, and is apparent within many of the individual instructions in the following chapters. A principle of Collocation would require that names for like or related persons, families and corporate bodies should be constructed upon the same base attribute and in a consistent structure so that the catalogue may reveal their intrinsic relationships.

8.2.4. ALA notes that application of the principle of Representation constitutes a significant change from current practice where the preferred form is the name most commonly found in resources in the language and script preferred by the author, not the agency creating the data. However, it is not clear that this principle (a nod to the IME ICC Statement?) has been consistently followed in the chapters on section 4.

8.2.5 and 8.2.6. See comment at 5.2.5–5.2.6 above.

► **8.3.2.** As in Chapter 5, ALA urges that the elements be listed as required for describing the entity; that a separate sub-instruction be devoted to the construction of access points based on the preferred name or title of the entity; that a further sub-instruction be devoted to the construction of a *unique* access point, if desired, by adding other elements to the preferred name; that the preferred name be listed as a required element for each entity, but that the potential additions used to differentiate identical names *not* be listed (or labeled) as required. This avoids the necessity for so many conditional requirements, with the conditions specified in footnotes.

8.3.4. ALA recommends that this instruction on optional elements be deleted as inappropriate in a section on required elements.

8.4.2. The difference between “recording” names and formulating access points is not clear.

8.4.3. When recording other identifying attributes, ALA prefers the RDA principle of recording data in the language and script preferred by the agency creating the data.

8.5.5. ALA sees no compelling for reason for RDA to follow the current AACR2 approach of having separate conventions for personal vs. corporate names when it comes to spacing of initials and acronyms. Although we are not convinced that such spacing issues matter, we recommend a consistent approach. We have no strong preference between the alternatives.

8.7.2. ALA would like to see more explicit guidance on making additions to variant access points included in this instruction. Our current practice with personal names is to add the same set of

dates that are in the preferred access point to all variant access points. We make the variant access points match the preferred access point in terms of fullness. We also currently make additions to variant access points to avoid conflicts with preferred access points for other entities/identities. Would these practices be considered “important for identification”? If so, the instruction should explicitly identify them.

8.8–8.10. ALA notes that these are not labeled either as optional or as required; we suggest making 8.10 (Status of preferred access point) required, and the others optional.

8.8.0.1. ALA proposes that the scope be broadened. Some identities are associated, not with form or type of work, but with the subject or other characteristic. Some identities are associated with entities other than works, e.g. translators are associated with expressions. Consider changing to:

Scope of usage is the type or form of work or other characteristic associated with the name designated as the preferred name for a particular identity established by a person, family, or corporate body, that serves to differentiate the usage of that identities from other identities established by the person, family, or corporate body.

8.9.0.3. ALA notes that often a date of usage cannot be determined; we need to be able to record “unknown” (or “not known”).

8.10. ALA wonders whether Status might be applicable to more than just the preferred access point. Should it become a sub-element of any data element? For example, it could be used to indicate that a cataloger not familiar with a particular language cannot tell whether a word in a personal name is part of a forename or a surname, or whether a level in a corporate body name is a government body or not. [*data about data*]

► **8.11. and 9.1.1.1.3.** The development of RDA provides an opportunity to rethink our current practices concerning treatment of identical names which cannot be differentiated. The current [NACO] practice is to record all such names in a single authority record, indicated as an “undifferentiated name”. On the other hand, the RDA implementation scenarios suggest a different approach: Describe each distinct person separately; this description of the person can be linked to the description of either works or manifestations, thus maintaining the proper relationships. The *name* – but not the *record* – would then be identified as “undifferentiated”. There is language in the present draft that suggests the former data structure; ALA strongly prefers that the language suggest the latter structure – or at least be neutral between them.

8.11.0.1.1. An indicator might also be a letter, number, or symbol; ALA would prefer not to require that this be recorded as a “term”.

Chapter 9

General comment. ALA suggests that there be more emphasis on recording all the different forms of names, and less prescription about selecting one as the preferred name.

Terminology. Throughout this chapter the term “element” seems to be used to refer to the parts of a name or of an access point or the pieces of information added to the name in constructing an access point. This does not seem to be the same as the use of the term to indicate a data element

that is part of the RDA Element Set. ALA suggests that it is wise to restrict the use of “element” to the latter meaning.

9.0.1.1, footnote 1. The definition repeats the text at 8.1.1.2 in its entirety; make a reference to that instruction instead of the footnote.

ALA notes that the definition of person does not include any limitation on the species of the individual or identity. This leaves the door open for treating non-human contributors (such as performing animals) as persons under the instructions in this chapter. ALA supports allowing this possibility.

9.0.1.1, footnote 2. The definition of reference source should be in the glossary or a high-level instruction, not in a footnote to sources of information guidelines in individual chapters; it should certainly not (as we point out elsewhere) be customized to the content of the particular chapter or element.

► **9.1.1.1.1.** ALA would like to see the general guidelines on constructing a preferred access point in this and other chapters give a very simple basic instruction: “The preferred access point for a person consists of the preferred name of the person; one or more other elements may be added to the preferred name in order to differentiate the name from other persons using the same name *if* it is desired to create a unique access point for each person.”

ALA is not convinced that RDA should take the position that a unique access point for each entity is necessary in every context. In particular, in the object-oriented relational environment of scenario #1, it would be quite possible to fulfill all the objectives of the catalogue using the existence of separate descriptions of each entity, each with a unique identifier; a unique *access point* would not be required in such a case. Furthermore, the instructions themselves recognize that it is not always possible to differentiate all names, and even imposes limitations on what may legitimately be used to differentiate identical names. ALA would like to see instructions added to the general guidelines on constructing a preferred access point in each chapter that will address whether a unique access point for each entity is necessary, how to differentiate identical names by adding additional name elements to the preferred name (including an order of priority for such additions), and what to do when there is not sufficient information to differentiate.

► **9.1.1.1.2.** If additions are to be made “in the order listed” in 9.1.1.2–9.1.1.4, there may be some problems. First, ALA recommends below that both dates and fuller forms of name be added if necessary to differentiate identical names; in any case, options allow for both to be added even if there is no conflict. The current order for these parts of an access point is for the fuller form of name to precede the dates. This suggests that 9.1.1.3 and 9.1.1.4 should be reversed. Second, we believe that there are two needs here: (1) to indicate the order in which these pieces of information are recorded in an access point, and (2) to indicate the priority in which the instructions are to be applied in making additions to differentiate identical names. ALA suggests that additional instructions are needed on when it is necessary to differentiate identical names, how to accomplish that, and what to do when there is not sufficient information available to differentiate the access points. See General comment on “Access points” above.

9.1.1.1.3. See comment at 8.11.

9.1.1.2.1. ALA does not support the restriction point e) in this instruction to “a person whose name consists of a phrase or appellation not conveying the idea of a person”. Pursuant to AACR 22.19, we are accustomed to including terms indicating profession when they are commonly found associated with the person’s name. “A.S.C.” is commonly appended to the name of a cinematographer, and “M.D.” or “Ph.D.” is commonly appended to the name of an academic. These are very useful ways of differentiating persons with the same name. Perhaps a distinction needs to be made between titles and other designations that are always added to a name (9.1.1.2) and a wider range of terms that may be added to differentiate identical names (a new instruction at 9.1.1.5).

9.1.1.3.1. The examples following this instruction show “born” before a birth date and “died” before a death date. Given that these captions are not specified in 9.4, we do not understand where they came from. Is this to be specified in Appendix E? We are not sure that conventions taken from Appendices D and E can be used in examples without confusion, particularly by agencies that are not applying those conventions.

9.1.1.4. ALA believes that there are cases in which the fuller form is necessary to distinguish identical names, even if there are dates available; we suggest that the wording parallel 9.1.1.3: “Add a fuller form of the person’s name (see 9.6), if necessary, to distinguish one access point from another.

9.2.0.4.2. Delete footnote 3. Phone books are quite *good* ways to see how a culture orders names.

► **9.2.1.2.** ALA notes the tension between the principle adopted here (prefer the language most often used in works by the person) and the principle adopted elsewhere (prefer the language preferred by the agency creating the data or best suited to the users of the catalogue). Some ALA respondents would like to follow the latter principle consistently, particularly if that remains in the IFLA Statement of International Cataloguing Principles; others feel that preference for the usage of the person (or family or corporate body) should follow the preference of the person.

9.2.1.2.1. The phrase “the form most commonly found” is commonly used elsewhere in RDA, rather than “of most of the resources”.

9.2.1.3a.2. This instruction is about script, not language, and so should read “If no form in the script preferred ... or if no one form in that script predominates ...” Also the explanatory text to the example should read “No predominant roman script form ...” for the same reason.

9.2.1.3b.1. The extensive footnote to this instruction needs to be renumbered as an alternate instruction.

► **9.2.3.** There is considerable support within ALA for adopting the same instruction regarding change of name as applies to corporate bodies. This is particularly true because of the instructions at 9.2.4 to treat variations of name as separate identities.

This instruction should explicitly address the issue of a person’s change of name once they have established an identity under an earlier name (cf. 11.2.1.5a.1 footnote 6). This suggests that in practice the distinction between a change of name and separate identities may not be sustainable.

9.2.4.2. ALA believes that this instruction is misidentified as an exception. It deals with a person who has only one bibliographic identity, the pseudonym, and is not known by his or her real name. Remove the “Exception” caption. We also urge the deletion of “as a creator or contributor”; this limitation is inappropriate.

9.2.5.1.3. Many ALA respondents felt that the need to determine an initial element in the name for sorting purposes was the result of limitations on our encoding schemas. They feel that this is an opportunity to define data elements with sufficient granularity to support a variety of sorting and display options.

9.2.5.2 and 9.2.5.3. The standard instruction to record the name in direct order as a variant should be included.

9.2.5.4, 9.2.18.2 and 9.2.19.2. The distinction between these situations has never been clear. Making the distinction violates the principles of Consistency and Common usage. ALA urges that these cases be treated the same; we prefer to record the name in direct order.

9.2.5.6. Revise the caption for clarity: “Words indicating familial relationship following surname.”

9.2.5.6.2. The rationale for excluding numbers is not clear. Unless there is a compelling reason, ALA suggests their inclusion.

9.2.6. The instructions for compound surnames are overly complex. The heart of this sequence of instructions is 9.2.6.5, with the preceding instructions as exceptions to it. In general, we prefer that the basic instruction precede the exceptions. In the following outline, the general instruction is stated first, followed by some cases in which the cataloger may not be certain whether to treat the name as a compound surname; finally, the exceptions to the basic instruction are given:

9.2.6 Compound surnames

9.2.6.1 General guidelines [*as in the drafts*]

9.2.6.2 Basic instruction [*based on 9.2.6.5*]

9.2.6.3 Nature of surname uncertain

9.2.6.3.1 Hyphenated names [9.2.6.3; include 9.2.6.7?]

9.2.6.3.2 Married women whose surname consists of surname before marriage and husband's surname [9.2.6.4]

9.2.6.3.3 Names in English, Danish, Faroese, Norwegian, or Swedish [exceptions from 9.2.6.5.3]

9.2.6.4 Exceptions to the basic instruction

9.2.6.4.1 Established usage [9.2.6.2]

9.2.6.4.2 Names in Portuguese [9.2.6.5.2]

9.2.6.4.1. ALA notes that the LC rule interpretation for 22.5A on Filipino names contains the following exception: “The names of many Filipino women give the paternal surname, also as a kind of middle name, followed by the husband’s surname, the two being linked by a hyphen. Although the hyphen causes the combination of names to look like a compound surname, Philippine sources consistently list these women under the husband’s surname. Enter these also under the second surname, i.e., the husband’s surname.” Consider adding this exception to the list in 9.2.6.4.1.

9.2.6.6b.1. These instructions are not consistent with the IFLA publication *Names of Persons* (4th ed., 1996):

Denmark: entry element according to person’s preference, if known; hyphenated compounds under first element; if unhyphenated and second part is Møller or ends in -sen, entry under first part; other unhyphenated names not linked by preposition, enter under second part; two surnames linked by preposition, entry under first part.

Norway: hyphenated, entry under first part; unhyphenated, entry under second part.

Sweden: entry under first part of compound, or under person’s preferred form if known, “but for practical reasons a middle name followed by a surname is usually treated as a compound surname, e.g. De Geer Bergenstråhle, Marie-Luise; Lärn Sundvall, Viveca”.

9.2.8.3. ALA recommends that “if considered important” be added to this instruction. It is not at all clear that references from the part of the name following the prefix would be necessary in all cases, including some of the examples in 9.2.8.2.

9.2.11.1. A reference to Appendix G (Titles of Nobility, Terms of Rank, etc.) would be helpful here.

9.2.15. ALA respondents noted that the dictionary definition of *patronymic* does not exclude a surname derived from a father or male ancestor (e.g., Olsson, MacDonald). Although the context of the present instruction (“names containing neither a surname nor a title of nobility”) is clear, we suggest that the term be defined to limit the scope.

9.2.15.3. Appendix F.7 on Malay names includes a section on “Filial indicators” (F.7.1.3). One of the filial indicators – “bin” (son of) – is effectively a patronymic like the Arabic “ibn”. Add a reference to F.7.1.3 to this instruction.

9.2.21.2 and 9.2.22.2. See comment at 5.5.4.1

9.3.0.3.3: ALA suggests rewording for clarity:

Record as a variant name a form of name used by a person, or found in reference sources, or resulting that results from a different transliteration of the name, that differs from the form recorded as the preferred name for that person.

9.3.2. ALA suggests that both secular name and name in religion are covered by 9.3.4 (Earlier name of person) and 9.3.5 (Later name of person) and that separate instructions are not needed.

9.3.6. ALA recommends that here and in the similar sections for other types of entities the language or script should be recorded. That would allow a computer to select those that are appropriate for a given user. This would be *data about data*, and may need to be added to a list to be developed after the initial release of RDA.

9.4.0.1.1. ALA recommends rewording the definition as:

A date associated with the person is a ~~significant~~ date or range of dates associated with a an event in a person’s life (e.g., date of birth, date of death)

9.4.0.3.1: An instruction regarding the use of C.E./B.C. and B.C.E/A.D. needs to be included here.

9.4.1.3.3. This instruction to record “unknown” is inconsistent with the instruction to record “not known” in 9.4.2.3.2. Either “unknown” or “not known” should be chosen and consistently used or an indicator value or some other code should be used.

9.4.2.3.2. See comments at 9.4.1.3.3

9.4.3.3. ALA notes that 9.1.1.3 is not explicit about the circumstances for the addition of the period of activity to the access point for a person. An additional instruction for situations where it is not possible to determine a person’s years or even century of activity needs to be added to this section, similar to the guidance found in the LC rule interpretation for 22.17.

9.4.3.3.1. While the name of the element will distinguish such dates of activity from birth and death dates, neither these instructions nor those as constructing an access point, indicate how such ranges of dates (birth-death or start-end of activity) will be distinguished when used as an addition to the access point. The convention of *fl.* used in ACCR2 are not specified here; will it be specified in Appendix F?

9.4.3.3.2. ALA would like confirmation that the use of the slash in the examples is not a prescribed convention, but rather is simply one way in which a cataloger may choose to convey the information.

9.5.0.5.1. There should be a reference to Appendix G here.

9.5.0.7.1 and 9.5.0.8.1. To make it clear that these instructions apply only to given names, bold the word **given** in these instructions or add an additional instruction indicating these titles are not added to surnames.

9.6. ALA notes that footnote 18 is in conflict with 9.1.1.4 which says to use the fuller form in the access point only if a date is not available. ALA recommends deleting this and recording the fuller forms as variant names.

9.6.0.3.1. ALA recommends that the instruction make it clear how the fuller form is to be recorded:

If a fuller form of a person’s name is known and if the preferred name as prescribed by the instructions given under 9.2 does not include all of that fuller form, record in direct order, as appropriate:

► **9.8.** This comment is submitted on behalf of the Gay, Lesbian, Bisexual, Transgendered Round Table of the American Library Association:

The current instruction [quotation of instruction] does not acknowledge the fluidity and variety of possible gender identity or identities of an individual over time. It also does not address coding of the variety of gender categories related to bibliographic identities, the individuals who create them, and the relationships among them. (How, for example, would we code George Eliot, a woman writing with a male name, or Barbara Michael, a husband and wife writing novels together under one name?) Furthermore, the limited number of possible values, and the language used for those values is offensive to many people.

The Gay, Lesbian, Bisexual, Transgendered Round Table recommends that RDA not prescribe any coding for gender, and that further study be made of the issues of gender in the context of resource identification and relationships between entities.

ALA agrees with the issues raised, but we hold differing opinions on whether the element should be deleted.

9.8.0.3.1. Remove “with which a person identifies”; that is part of the definition of gender in 9.8.0.1.1.

9.9–9.12. ALA notes that under FRBR/FRAD and RDA, places are separate entities and should be treated here as a relationship; see General comment on “Entities as elements” above.

9.9.0.3.1. Since place of birth is defined in 9.9.0.1.1, if this instruction is retained rather than being treated as a relationship, ALA recommends this instruction be reworded as:

Record the place of birth (~~town, city, province, state, and/or country~~) in which the person was born of birth.

9.10.0.3.1. Since place of death is defined in 9.10.0.1.1, ALA recommends this instruction be reworded as:

When applicable, record the place of death (~~town, city, province, state, and/or country~~) in which the person died.

9.11. The terms “country associated with the person” and “country with which the person is identified” are used interchangeably throughout this element. ALA notes that the phrase used in FRAD is “country with which the person is identified” and recommends that this phrase be used consistently.

9.12. If this element is retained rather than indicating as relationship to a place (see General comment on “Entities as elements”), the element should include associated dates. ALA also suggests that the repeatable sub-element Geographic level. This allows for clear structure of multiple levels of place for multiple residences.

9.12.0.1. ALA recommends being less prescriptive about the components of a place of residence. FRAD defines this less prescriptively as “a country, state/province, city, etc. in which the person resides or has resided.” A possible rewording would be:

Place of residence is the country, state/province, city, etc. ~~town, city, province, state, and/or country~~ in which a person resides or has resided.

9.12.0.3.1. Since the phrase “place of residence” has been defined at 9.12.0.1, ALA recommends using that phrase instead of repeating the definition:

Record the place or places of residence (~~town, city, province, state, and/or country~~) in which the person resides or has resided.

9.13. Some ALA reviewers urged the deletion of this element from RDA on the grounds that the information is/ought to be private. If the elements is retained, it needs to be made clear (as FRAR does) that it includes email addresses and URLs. Finally, this is a highly unstable piece of information. For it to be useful, dates associated with the address need to be recorded.

9.13.0.1. Reword this instruction as “Record the address of the person.” The definition is already given in 9.13.0.1.1.

9.13.0.3.2. Since 9.12.0.3.1 includes “place or places ... in which the person resides or has resided”, shouldn’t this instruction about addresses specifically allow the ability to record past addresses associated with the person? Suggested rephrasing: “Record the past and/or current address of the person’s place of residence, business, or employer.”

9.14. ALA notes that under FRBR/FRAD and RDA, corporate bodies are separate entities and should be treated here as a relationship; see General comment on “Entities as elements” above. If the element is retained, the element should include the recording of associated dates (as *data about data*).

9.16 and 9.17. Although ALA acknowledges that the definitions of scope of these elements are directly from FRAD, the difference between the elements was not clear to the reviewers.

9.16.0.3. ALA suggests that there be an optional instruction allowing for a term from a controlled list of names of fields of activity.

9.18. ALA recommends broadening the scope of this element and re-captioning it as “Other information about the person”. That caption is more in parallel with other chapters.

9.18.0.1.1. In support of the above recommendation, ALA recommends changing the definition to:

Other information about the person is any information about the person that does not fall into another data element.

9.19.0.3 and 10.10.0.3. ALA wonders what defines an LC control number and an LAC control number as having a prescribed format but the identifiers of the Union List of Artist Names or the AMG artist list as not having a prescribed format. This distinction would appear to be library-centric. ALA proposes to always record the name of agency assigning the identifier. Identifiers need context. Cf. comment at 6.10.0.3.

Chapter 10

General comment. ALA applauds the ability to differentiate family names, rather than using a single heading to represent multiple families.

ALA would like to propose “occupation” as a potentially useful addition to access points for families and as a potentially useful identifying attribute. Sometimes a family will be identified with an occupation over several generations (e.g., the Elzevir family of printers or the Couperin family of musicians and composers). In such cases, the occupation is probably a more useful identifier than the most prominent member of the family (and there is not always a single prominent individual comparable to J.S. Bach in such families).

► **Punctuation and order of elements.** The placement of dates associated with the family at the end of the access point, preceded by a comma and outside of the parentheses used for the other additions seems to reflect the pattern used for personal names. ALA prefers to base the order of

element, and the punctuation, on the practice for corporate names, with the date preceding the place of activity inside the parenthesis:

Smith (Family : 18th century : Williamsburg, Va.)

rather than

Smith (Family : Williamsburg, Va.), 18th century.

10.0.2.1. ALA suggests either explicitly expanding footnote 2 to include websites and catalog entries as examples of reference sources.

10.1.1.2. Regarding the instruction “Make additions ... in the order listed,” ALA notes that the order may not be readily apparent in an online environment; we propose that the instruction explicitly state the order in which the additions are to be made in the access point.

10.2.0.2. ALA proposes explicitly expanding footnote 3 to include sources other than books and articles that can be used as reference sources (e.g., archival finding aids, catalog entries, websites, etc.)

10.2.0.4.2. ALA notes that the wording in this instruction varies from a similar section in 9.2.0.4.2 and recommends consistency in phrasing. However, we recommend that here, and elsewhere in the draft, the word “element” be reserved to refer to an entire data element, not a part of a data element (here, it refers to the first part of the preferred name element).

10.2.2.2. ALA suggests changing “choose one name” to “choose the preferred name” to parallel the similar instruction in 9.2.2.2.

10.2.4. ALA notes that in modern American marriages, it is common for the husband and wife to retain separate surnames rather than adopting a compound surname or one spouse adopting the surname of the other. The resulting family is often known by both surnames joined by a slash (e.g. the “Smith/Jones family” formed from the marriage of John Smith and Jane Jones). The instructions should specify provisions for a single family formed by the merger of two surnames.

10.4.0.3.1. ALA suggests that these terms need definitions or the instruction needs to include guidance on how to determine the type of family. Without definition of these listed terms, some notable cases pose difficulty in classification. For instance, should Tokugawa Shogunate be designated as a clan, dynasty, or simply a family? “Dynasty” is also used to represent Chinese imperial historical periods (before 1912). If the term is used for other context here, some explanation should be provided. Some definition of these listed terms would be necessary for consistent application of this instruction.

ALA suggests that it needs to be made explicit whether or not the list of family types is intended to be comprehensive. Additional terms might be “sept” (a branch of a family; related to clan), “moiety” (a subdivision in a tribal group), “tribe,” and other terms used in non-western cultures.

10.5. ALA notes that under FRBR/FRAD and RDA, places are separate entities and should be treated here as a relationship; see General comment on “Entities as elements” above.

10.5.0.1.1. ALA suggests the addition of “date range” in the definition: “a significant date or date range associated with a family.” In fact, ALA tends to prefer that a range of dates be given whenever possible.

ALA also wonders about the need for the word “significant.” Would a significant date refer to a date associated with a significant event in the history of a family? Which types of dates might be considered significant? Unless such guidance is forthcoming, we would suggest that “significant” be deleted; cataloger judgment would determine whether a date (range) is significant enough to be recorded.

10.5.0.3.1. ALA notes that the instructions for recording dates associated with a family point only to 9.4.0, the basic instructions used for recording the dates associated with persons. However, 9.4.0 specifies that dates should be recorded by giving the year alone, with exceptions made for adding question marks or the word “approximately” to the year date, or alternative dates, or using date ranges in the form “[year]-[year]” to express periods of activity. ALA finds 9.4.0 too limiting for recording dates associated with families and suggests also pointing to 9.4.3 (date of activity), which explicitly allows date ranges to be represented by a single century or range of century dates. Alternatively, ALA suggests including all of the applicable information on recording dates associated with families in 10.5 itself.

10.6.0.3.1. ALA notes that estate or house names might also be useful for English gentry and minor European nobility (e.g., “The Park Hill Smiths : a family history for an Australian family.” The number of Smith families in Australia or even Queensland is immense).

ALA also suggests that guidance be provided regarding the treatment of multiple places associated with the family. Is there a prescribed preference for the order in which the places should be recorded? If the places are numerous, should a larger place name be used instead? How will multiple place names be used in the access point, if needed to distinguish one family from another? What if some members of the family are associated with one set of places and some with another set of places? Modern families, especially, are very mobile!

10.7. ALA notes that under FRBR/FRAD and RDA, persons are separate entities and should be treated here as a relationship; see General comment on “Entities as elements” above.

10.7.0.1.1. ALA suggests that other family members who are not well-known might be considered prominent (e.g., the head of the family) and serve as useful additions and/or identifying attributes. Proposed additional wording: “A prominent member of the family is the head of the family or a well-known individual who is a member of the family.

10.8.0.1. ALA wonders what might (and might not) be covered by the “etc.” Would any kind of hereditary title be considered in scope? Could more of the kinds of titles in 9.5.0.1 apply here? Would titles of royalty be excluded from consideration because they are addressed in 10.2.5 (Names of royal houses, dynasties, clans, etc.)? Would religious titles that are hereditary in certain cultures be in scope? Would British hereditary titles that are not titles of the peerage be in scope (e.g., baronets and baronesses are not peers but they may pass on their titles)?

10.8.0.3. ALA requests that the instruction specify whether the hereditary title should be recorded in singular or plural form; currently, the examples all appear in the singular form; the plural seems more appropriate for a family. ALA also notes that access points for family names

as currently constructed in LCSH can have the hereditary title of nobility as the preferred name (e.g., LCCN sh 85092410: Norfolk, Dukes of); in this draft, hereditary titles can only be recorded as identifying attributes (and apparently cannot be used in access points at all, even as additions, as they are not listed in 10.1.1.2-10.1.1.5); we ask for confirmation that this limitation is intentional. Finally, ALA notes that the instruction should account for the facts that titles and ranks associated with a family may change over time (e.g., an earldom may become a duchy).

10.9. ALA suggests broadening the scope of this attribute and changing its name to “Other information about the family”.

10.9.0.1. ALA suggests changing the definition to: “any information about the family that does not fall into another data element”.

Chapter 11

► **General comment.** Having separate instructions for government bodies and other corporate bodies introduces both redundancy and complexity. Although the distinction is carried forward from AACR2, ALA believes that it is time to eliminate the distinction and to merge these two groups of instructions. If there is interest in pursuing this recommendation, ALA is willing to make a proposal.

11.1.1.2. ALA suggests that it might be helpful to include a general outline of what additions may be made to access points, with references to the appropriate sections, similar to that in 6.1.1.7.1:

Make the following additions to the name as instructed under ~~11.1.1.2–11.1.1.8~~, as applicable, in the order listed, as applicable and necessary to identify or differentiate the corporate body:

- a) addition to a name not conveying the idea of a corporate body (see 11.1.1.2)
- b) place associated with the body (see 11.1.1.3)
- c) associated institution (see 11.1.1.4)
- d) date associated with the body (see 11.1.1.5)
- e) type of jurisdiction (see 11.1.1.6)
- f) other designation associated with the body (see 11.1.1.7)
- g) number, date, and location of a conference, etc. (see 11.1.1.8).

11.1.1.3.7. This instruction would be more helpful if it appeared immediately following the general instruction at 11.1.1.3.1, and were labeled as an exception. Also, because choice of additional element may best be left to cataloger judgment, ALA suggests that the final clause be changed to read: “... better identification, prefer one or more of them over the place name.”

11.2.0.6.2. See comment at 5.5.4.1.

11.2.0.8.1 and 11.2.0.8.2. Although the Chinese terms “gu fen you xian gong si” or “you xian gong si” are pretty much identical to the Japanese term “Kabushiki Kaisha” in meaning, since there is no specific instruction provided, cataloging practices have been mixed. Since these terms exist in a large number of Chinese corporate body names, we recommend that they be included in these instructions and examples. It would also be helpful to add common Chinese, Malaysian and Indonesian examples. Add “*gu fen you xian gong si* or *you xian gong si*” to the lists in parentheses in 11.2.0.8.1 to read: (e.g., *Aktiebolaget, Gesellschaft mit beschränkter Haftung, gu fen you xian gong si* or *you xian gong si, Kabushiki Kaisha, Societa per azione*).

11.2.0.8.1. One respondent recommended changing the AACR2 rule and always including terms of incorporation, because of foreign language terms not always known or understood to be terms of incorporation.

11.2.0.8.3. Omit the phrase “in an oriental language”; not only is the term offensive to some people, but there is no reason for the limitation. The examples cited in the instruction make the context clear. We note that the phrase “integral part of the name” is not self-explanatory; we are not sure exactly what it is intended to mean.

11.2.0.9. ALA asks the JSC to reconsider the difference in treatment of names of conferences, congresses, and meetings vs. names exhibitions, fairs, and festivals, in regard to the removal or retention of words denoting frequency. Since a word denoting frequency is sometimes used as a substantive instead of an adjective (e.g., Biennale di Venezia) its inclusion is grammatically essential in such cases. We tend to prefer consistent treatment, i.e., include the words denoting frequency for both classes of bodies. If the difference in treatment is retained, more examples should be included to illustrate the difference more clearly.

11.2.0.10.1. See comment at 6.2.0.5.1.

11.2.0.10.2. It is not clear if any criteria for predominant usage should apply to the choice of transliterated names for corporate bodies. ALA suggests that the instructions for corporate body names at 11.2.0.10.2 be consistent with those for personal names at 9.3.1.3b.

11.2.1. ALA finds it unclear and unhelpful to have the instructions on choosing the name (11.2.0.3 and 11.2.1) interrupted by instructions on recording the name (11.2.0.4-11.2.0.10). We prefer that all of the instructions on choosing the name be kept together in one section.

11.2.1.1. It is unclear whether the phrases “different forms” and “variant forms” are referring to the same concept. If they are the same, ALA requests that only one phrase be used. If they are different, then the distinction between the two must be made clear.

11.2.1.1.2. The final clause in this is redundant and should be deleted. The information in footnote 4 is very important in understanding what is *not* a variant name for a corporate body, and should be part of the instruction itself.

If variant forms⁺ of the name are found in resources associated with the body, choose the name as it appears in the preferred sources of information (see [2.2.1](#)) as the preferred name, ~~as opposed to forms found elsewhere in the resources.~~ Variant forms do not include names that the body has abandoned in the past or adopted for the future (see 11.2.2).

11.2.1.3, footnote 5. ALA believes that the alternative instruction in footnote 5 should be treated in the same manner as the alternative instructions at 11.2.0.10.2. The alternative instruction would be placed following 11.2.1.3.1, the instruction to which it is an alternative.

11.2.1.3.4 and 11.2.14.2. ALA suggests that the instruction be revised to read: “In case of doubt, choose the form that is presented first in the first or earliest resource received.”

11.2.1.5.1. The instruction here seems to be at odds with 11.2.1.1.2. The instructions at 11.2.1.1.2 appear to prescribe a clear hierarchy of 1) preferred source of information, 2) formal presentation, and 3) most commonly found form. It is not clear when 11.2.1.5.1 should take precedence over 11.2.1.1.2, and whether “frequently” and “most commonly” have the same

meaning. ALA suggests that the discrepancy be resolved by either further clarifying the conditions under which it is to be applied or deleting 11.2.1.5.1.

11.2.1.5a.1. ALA suggests that: 1) the information and instruction in footnote 6 be incorporated into the instruction; 2) the mention in the footnote to use an English form of name be deleted; and 3) the instruction on later established name be clarified (so it is not confused with the term “established” as commonly used by catalogers to mean the authorized form of name in an authority record). A suggested revision of the instruction:

If the name of a body of ancient origin or of one that is international in character (e.g., religious bodies, fraternal and knightly orders, church councils, and diplomatic conferences) has become firmly established in a form in the language preferred by the agency creating the data, choose that form as the preferred name. If a diplomatic conference has no formal name and has not yet acquired a conventional name, choose the name found most commonly in periodical articles and newspaper accounts as the preferred name. If a different name later appears in common usage, change the preferred name to that name.

11.2.1.5b.1. The relationship between this instruction and the form of place name established following Chapter 16 needs to be clarified. There is no instruction here, for example, requiring the qualifiers specified in Chapter 16. Furthermore, it is unclear whether the current name of the place is to be used as a qualifier or an appropriate historical form (“Constantinople” rather than “Istanbul”). The phrase “the name of the place by which it is identified” begs all these questions. In general, ALA would like to see general use of the instructions in Chapter 16 when using place names as part of a preferred name; on the other hand, if simplification of the Chapter 16 instructions is deemed appropriate, it should be documented as such in these instructions.

11.2.1.5d.1, footnote 7. ALA prefers to avoid footnotes. In this case, the first sentence should be included in the glossary definition of *government*. The second sentence should be added preceding the first sentence of 11.2.1.5d.1.

11.2.1.5f point f). In the interest of internationalization, change all occurrences of the phrase “Local churches, etc.” with “Local churches, mosques, temples, etc.”

11.2.3.1.1. ALA suggests that the contrast between direct and indirect treatment be identified explicitly as part of this basic instruction:

Record *directly* the name of a subordinate body or a related body following the basic instructions given under 11.2.0, unless its name belongs to one or more of the types ~~listed under~~ *to be recorded subordinately* (see 11.2.3.2).

11.2.3.1.2. ALA recommended above that the instructions for government and non-government corporate bodies be merged. At the least, we suggest that the two lists at 11.2.3.2 and 11.2.6.2 be merged.

11.2.3.1.4. This instruction is not part of the exception, but is a continuation of the basic instruction in 11.2.3.1.1; we suggest it be moved to 11.2.3.1.2 and the subsequent instructions renumbered. This type of situation occurs frequently in the RDA text, and should be handled consistently.

11.2.3.2. Some ALA commentators suggested the need for a list of terms fitting Types 1 and 2; knowing the appropriate terms in various languages is necessary for consistent application. Such lists are currently provided in an LC rule interpretation to 24.13 Type 2.

11.2.3.2.2, footnote 8. The information in footnote 8 is part of the instruction and should be presented as such. The wording could also be improved. ALA suggests the following:

Record the name of a subordinate or related body as a subdivision of the preferred access point for the body to which it is subordinate or related if its name belongs to one or more of the following types. Distinguish cases in which a subordinate body's name includes the name of a higher body from cases in which the name of a higher body appears only in association with (but not as a part of) the subordinate body's name. Make ~~# the name~~ a direct or indirect subdivision following the instructions given under 11.2.3.3. Omit from the subdivision the name or abbreviation of the name of the higher or related body in noun form unless the omission would result in a name that does not make sense.

11.2.3.2.8 TYPE 5. ALA suggests that the type be described more clearly:

TYPE 5. A name of a university faculty, school, college, institute, laboratory, etc., that simply indicates a particular field of study and does not have its own distinctive name.

11.2.3.2.9 TYPE 6. The difference between the cases entered subordinately and those entered directly may not be quite clear to everyone. Is there a certain degree of “fullness” that should be met to determine whether or not the name contains the “entire” name of the higher or related body? Is it the entire preferred name of the higher body? If most of the name of the higher body is included, but some minor words are omitted, is that the “entire” name or not? ALA requests that the criteria for this type be clarified.

11.2.4.3. ALA suggests that the instruction be stated more clearly as:

If the preferred names of the parent bodies are recorded as subdivisions of a common higher body, record the name of the joint unit as a subordinate body following the instructions given under 11.2.3.

11.2.4.3. ALA suggests adding a new instruction following 11.2.4.3 (renumbering the subsequent instruction):

Record variant names of the corporate body as indirect subdivisions of the parent body or bodies, if considered important.

11.2.5. ALA believes this instruction could be omitted, or broadened to include other countries:

11.2.5 ~~CONVENTIONALIZED NAMES FOR STATE AND LOCAL, PROVINCIAL, AND STATE UNITS OF UNITED STATES POLITICAL PARTIES~~

- 11.2.5.1 ➤ Record the name of a ~~state or~~ local, provincial, or state unit of a political party ~~in the United States~~ as a subdivision of the preferred access point for the party. Omit from the name of the unit any indication of the name of the party or the state or locality.

11.2.6.1.3. ALA suggests that 11.2.6.1.3 (which is part of the basic instruction that begins at 11.2.6.1.1) should precede the exception at 11.2.6.1.2.

11.2.6.3.2. ALA suggests that the simpler wording used in 11.2.3.3.2 be substituted here:

~~Record the name in the form of a subdivision of the preferred access point for its immediately superior body as a variant name when the access point does not include the name of that superior~~

body (see [11.3.4](#)). For instructions on recording variant forms of a name recorded as a direct or indirect subdivision of a higher-level body, see [11.3.4](#).

11.2.7.1.1. The scope statement does not appear to include all of the categories listed in the contents of 11.2.7.

11.2.7.2 and 11.2.7.3. Although AACR2 included separate rules for recording the titles of Heads of state and Heads of government, the principle behind this distinction is unclear. ALA recommends that the instructions for these two kinds of officials be consistent, particularly regarding choice of language; we prefer the language of the jurisdiction. ALA would even support combining the two instructions, and some commentators would support merging all of the instructions for officials.

11.2.7.5.1. ALA believes that there is no principled reason why governors of dependent or occupied territories (as well as other officials) should not be treated like heads of state; access points for specific holders of the office should be allowed.

11.2.8.3. ALA does not believe that this “exception” for subcommittees of the United States Congress is appropriate. Either all subcommittees should be treated in this way, or all subcommittees should be named following 11.2.8.1.

11.2.10.1.2. The explanations that follow the examples here and elsewhere could be clearer; “name” could be a preferred name or a variant. In cases such as this, we suggest “Name usage:”.

11.2.11.1.1. The footnote to the third example is unnecessary. The fact that “United States Marine Corps” is given as an example in an instruction on “principal service[s] of the armed forces” is a clear indication that RDA intends the instruction to apply to this body. A footnote defining the status of a single corporate body is an outrageous example of case law.

11.3.0.3.2. ALA is not convinced of the utility of applying the concept of separate identities to corporate bodies. The point here is that the instruction applies to corporate bodies that (contemporaneously) use more than one name, as well as to those that change names. The introduction of the concept of separate identities only obscures this.

11.3.2.3.3. The instruction should be self-sufficient and not rely on earlier instructions for the meaning of “such a catalogue”. We suggest:

In the context of ~~such~~ a catalogue that treats initials with full stops differently from those without full stops, if the full name is chosen as the preferred name, record initials without full stops, as well as with full stops as variant names.

11.3.3.1.1. We would prefer to see this instruction specifically refer to different translations of the name into the same language. Variant translations belong here, not in 11.3.4. For an example, see the current NAR for “Bayerisches Staatsorchester”, which includes two different French forms of the name: “Orchestre d’état de Bavière” and “Orchestre national de Bavière”.

11.3.4.1.1. ALA is not convinced that pseudonym is a useful concept with reference to corporate bodies; we would prefer to speak simply of different names used by the body.

11.3.4.3. The instructions on variant names are inadequate in addressing shorter, fuller, and inverted forms. The LC rule interpretation for 26.3A3 provides more thorough guidance; consider adding some of those provisions here, rather than relying on the examples.

11.4. ALA notes that under FRBR/FRAD and RDA, places are separate entities and should be treated here as a relationship; see General comment on “Entities as elements” above.

11.4.2. The location of headquarters, etc., is subject to change; therefore, the instructions should indicate that both current and past locations are in scope and there should be provision for recording dates associated with a particular place.

11.5.2, footnote 14, 11.5.3, footnote 15, and 11.7, footnote 16. See discussion of requirements at 8.3.2 above. If retained, we suggest adding “and the other qualifiers do not suffice to distinguish the access point” at the end of the instruction; date is only one of the elements that may be used to distinguish identical names.

11.6. ALA questions the usefulness of an element of this generality, as opposed to the more extensive and open-ended approach allowed in 11.7.0.4.

11.7.0.5. Shouldn’t this be covered by instructions in Chapter 16 (16.2.7)? We suggest that these instructions be moved to Chapter 16 and covered here by a reference.

11.9.0.1.1 and 11.9.0.3.1. An address may change over time. We suggest that “the address” in both be modified to “the past and/or current address” and that instructions be provided to indicate date(s) associated with a given address.

11.12.0.3. What defines an LC control number and an LAC control number as having a prescribed format whereas the Union List of Artist Names and the AMG artist list are not in a prescribed format? This distinction is not clear.

Chapter 16

► **General comment on the scope of the chapter.** Place names have always been a problem in cataloging because generally the same name identifies both the geographic area itself and the corporate entity with jurisdictional or administrative responsibility for the geographic area. This issue relates not only to place names identifying governments at all levels, but also to many other corporate bodies that control a geographic area, such as a university campus, an airport, an amusement park, a cemetery, etc.

The development of RDA presents an opportunity to resolve this issue. ALA would welcome an effort to expand the scope of the chapter to deal with all geospatially-defined entities. The availability of a single comprehensive set of instructions on place names would fill a long-standing need. It would also provide a context in which to resolve the issue described above, probably through the provision of an elements (*data about data*) that would identify the appropriate usage of the place name.

General comment on examples: The examples in this chapter all need to be interpreted in the light of the instruction (16.2.0.3.1 a) to record the name in the language preferred by the cataloging agency. Somewhere – but perhaps not with each relevant example – it needs to be stated that these examples show English as the preferred language. Alternatively, there should be examples that show other the application of other preferred languages, with explanatory comments.

16.0.1.1, footnote. The footnote violates the objective of Currency – with GIS and GPS, unnamed places are much more frequently referred to, via coordinates – and the principle of Terminology (FRBR and FRANAR do not limit places to those with names).

16.0.2.1 and 16.2.1.1. The language of this instruction is more appropriate to traditional printed sources, whereas we believe that online databases of geographic nomenclature are more often used in current practice. Furthermore, the instructions should recognize the existence of officially-designated “naming bodies” (such as the U.S. Board on Geographic Names) responsible for identifying the preferred names of places from their government’s perspective. In some countries, including the United States, other government agencies are required to follow the decisions of their naming agencies.

16.2.0.4.2. There seems to be no instruction that would justify the use of abbreviations in recording the name of the larger place. ALA would support the use of full forms, but it was our impression that the use of abbreviations was intended.

16.2.4. This instruction should recognize that, in the case of the Soviet Union and Yugoslavia, the jurisdictions in question no longer exist; we suggest moving those to the end of the list: “... or the former U.S.S.R. and or the former Yugoslavia.” We also suggest that the instruction use “Soviet Union” instead of “U.S.S.R.”

16.3.0.3.2 footnote, 16.3.0.3.1. The significance of “*significantly* different” is not clear. We recommend deleting “significantly”.

16.3.2.2.1. “Acronyms” is not mentioned previously nor are there any instructions dealing with acronyms.

16.6. ALA supports requiring identifiers for Place, as for other entities.

16.6.0.1.1. Geographic coordinates seem to fit the definition of an identifier in 16.6.0.1.1, yet they are treated as a separate element at 16.4. If the intent is to exclude coordinates from the scope of Identifier, 16.6.0.1.1 needs to be revised.

Section 9

► **General comment.** One important aspect of entity-relationship modeling that both FRBR and FRANAR do not take advantage of is attributes of relationships. This feature is needed in RDA to adequately represent dates and other data elements.

29.1.3.1. Again, the context of the chapter provides for a different definition of these terms.

► **29.3.** ALA feels strongly that in the chapters on relationships, the first requirement should state which relationships are required. A second requirement should state that both the name and the identifier are required when recording a relationship. The name of the related entity should contain those elements that are listed as required in the appropriate chapter in Section 4. In that context, ALA urged that the requirement be the preferred name and that the elements to be included in a preferred access point should be stated separately. If this recommendation is followed, 29.3.2 should be deleted. As noted above, 29.3.3 should also be deleted as inappropriate in instructions on required elements.

29.5. Elements should be named and defined as concepts, not as technical objects. Neither FRBR nor FRANAR refer to this as a “designator”. Change the name of the element to “Type of relationship”.

Appendices F–H

Many of the comments on the Appendices came from the ALA Committee on Cataloging Asian and African Materials (CC:AAM), whose members are specialists for many of the linguistic families covered by Appendix F and G.

ALA recognizes that the uneven coverage of these instructions was the reason for their placement in an appendix. However, ALA feels that fuller coverage is desirable, either within RDA or in specialist cataloging manuals. The comments below point out issues that ALA recommends for further work to enhance RDA following the initial publication in 2009.

Appendix F. While recognizing that this appendix is preserving AACR2 rules, ALA feels that these instructions should at some point be rewritten following the principle that the instructions for access points should be based on common practices in the country where an author resides or publishes. This principle should be made explicit in the text of the instructions.

It is also recommended that Scope statements at some point be provided for all linguistic groupings covered by Appendix F to address questions about whether a particular section deals with: the language of origin of the name; the country of residence of the person; the language of the person; the ancestry of the person; any of the above; or something else, as well as what to do when the instructions conflict.

F.2. Burmese names have issues that are not adequately addressed in AACR2/RDA; it is recommended that a source of expertise be identified to enhance the guidelines.

F.6. An LC rule interpretation for AACR2 22.26C1.c offers further guidance on variant forms for Indonesian names with terminal initials; it is recommended that this guidance be incorporated into the RDA text at some point.

F.6.1.7. The title *Haji* under F.6.1.7.1 is not recorded as part of the heading in contemporary cataloging practice.

F.7. There is a recent trend in Malay names of linking two names used by the author with the @ sign (short for the word *atau*, “or”), where the name elements preceding the @ should be the preferred access point with the name elements following it should be recorded as a variant; this practice should be assessed and, if appropriate, added to the RDA instructions.

F.10. There is a recent trend in Thai women’s names of recording the woman’s maiden name in parentheses preceding her married name, where current practice is to establish the name in full, but without the parentheses; again, this practice should be assessed at some point and, if appropriate added to the RDA instructions.

F.11. Initial articles are usually retained in Arabic and Persian sources; in the interests of internationalization the JSC should consider retaining initial articles in surnames, but continue the practice of filing on the letter following the article. See comment at 5.5.4.1.

Appendix G: Malay titles and honorifics are even more complicated than the Indonesian and Iban ones covered in the Appendix. Malay titles would be a good candidate for enhancing the coverage of this Appendix.

Appendix H. While ALA appreciates the need to address the complex history of adoption of the Gregorian calendar in the west, the exclusive focus on this particular pair of calendars runs counter to the goal of internationalizing *RDA*. It would be helpful if other calendar systems were also described (the Buddhist calendar, the Chinese lunar and imperial calendars, Islamic calendars; the Jewish calendar, etc.), as well as deviations from the Gregorian calendar in the west, as with the French Revolutionary calendar. ALA strongly encourages expansion of the calendars covered by Appendix H at some point.