

5JSC/RDA/Sections 2-4, 9/Chair follow-up/3  
17 March 2008

**To:** Joint Steering Committee for Development of RDA

**From:** Deirdre Kiorgaard, Chair, JSC

**Subject:** RDA: Resource Description and Access Sections 2-4, 9 – Review by other rule makers of December 2007 Draft – Germany

These are comments on the draft Sections 2-4 and 9 of RDA received from the expert groups of the Committee for Library Standards and the Office for Library Standards of the Deutsche Nationalbibliothek.

Office for Library Standards  
March 17<sup>th</sup>, 2008

**Comments on „RDA – Resource Description and Access” – Sections 2-4, 9  
Constituency Review of December 2007 Draft**

Submitted by: Office for Library Standards, Deutsche Nationalbibliothek  
E-mail address: r.goempel@d-nb.de

A draft of “RDA – Resource Description and Access” sections 2-4, 9 was made available by the Joint Steering Committee in December 2007 (<http://www.collectionscanada.gc.ca/jsc/docs/5rda-sec2349.pdf>). JSC invited to comment the draft by March 17<sup>th</sup>, 2008.

We appreciate this opportunity and thank for sharing the draft of the sections 2-4, 9 worldwide. We would like to accept this offer.

The expert groups of the Committee for Library Standards participated in commenting the draft of RDA, sections 2-4, 9. Their comments are included in our joint comment submitted herewith by the Office for Library Standards of the Deutsche Nationalbibliothek. Topics raised in the cover letter are listed in the relevant chapter preceded by the symbol ●.

**GENERAL ISSUES**

Additionally to the new draft, a set of documents (RDA Scope and Structure, RDA Element Analysis, RDA to FRBR Mapping, RDA to FRAD Mapping) was issued to ensure within the process of developing RDA that the metadata produced with RDA will be well formed. The documents describe how to record the values of elements, how to use controlled vocabularies where appropriate, and how the overall structure is governed by a formal model. The documents are also meant to support the ongoing discussions with the metadata and semantic web communities. We assume that the instructions given in these documents will be included in the general introduction to RDA. We consider it as essential that the structures and models underlying RDA should be part of the guidelines and instructions.

We noticed that RDA avoids referring to a certain data model. The relationships between resources respectively entities might be realized either by identifiers representing the resource (respectively entity), by access points representing the resource (respectively entity), or by a composite description representing the resource (respectively entity). The three alternatives are downwards compatible, but not upwards. Even though all three alternatives might produce well-formed metadata, it would make sense to define a preferred alternative for the library community. In order to be able to interoperate with other RDA users easily, we would appreciate unambiguous guidelines and instructions in which cases authority data should be used and in which way controlled access points should be represented. We definitely would appreciate an object oriented model which enables the use of controlled forms and each description likewise for the representation of entities and of properties.

JSC has resubmitted the document “Draft statement of objectives and principles for RDA”. We again suggest therein adding “interoperability” as an overall objective of the rules. We suppose that the rules have to reflect how the metadata produced with RDA will fit together internationally, nationally, within library networks, and within the local catalogues. We are convinced that interoperability is not only needed for machine-to-machine processes but also for the cataloguing process.

We wonder why RDA do not acknowledge the value of the existing national and cross-national authority files as sources of information for access points, names, and identifying elements. We would appreciate if they were accepted as main sources of information. The present RDA drafts seem to blind out that in today's cataloguing new access points first have to be checked within the own authority files and online catalogues. In the case that an access point based on a name in a foreign language is new to the authority file preferred by the agency creating the data resp. catalogue, the cataloguers – at least those participating in the German name authority files - consult the authority files responsible and competent for providing the access points for resources in that language. We appreciate that the big national and cross-national authority files, such as the NACO file, are web-accessible and greatly reliable, so that they can easily be re-used. By re-using and building on already established access points the consistency within and between authority files, catalogues, and networks is guaranteed across national and community borders, and cataloguing work can be shared and distributed.

We do not understand those stipulations (e.g. in 9.2.2.2) to determine as the preferred name of an entity that one most frequently used in resources associated with the entity or that one appearing most frequently in reference sources. In authority files variant access points identify the entity which they represent as unambiguously as the preferred access point. So we would not think of changing the preferred names depending on their occurrences in resources or reference sources but would include variant names as appropriate. Administrative metadata like that on the status of an access point allow to assess its reliability.

We would like to question the fact that "other identifying elements" are only requested when needed to distinguish one access point from another. On the one hand, we experienced that additional properties help to recognize the entity in subsequent publications, thus supporting authority control, and likewise help end-users to easily select the access point which they are seeking for. On the other hand, many properties (especially of the type "role") are entities on their own and might already have an identifier and a rich description. We would prefer to include identifying elements in any case if they are easy to detect from the item in hand or the Internet.

We suggest pointing out and highlighting more clearly whether an element is required or optional. We can also think of a colored accentuation of a web-based product. In former drafts you mentioned that there will be an overview of required and optional elements. Is this still planned in the complete full draft? We would appreciate it.

We note that there are some cross-references referring from one guideline to another and to a third (e.g. 6.23.1.17.2 refers to 6.23.1.15 which refers to 6.23.1.14). We recommend that links refer directly to the appropriate guideline in the web-based product.

Although RDA should be an international code most of the examples given in the whole draft are very Anglo-American oriented, and we recommend giving more commonly known examples.

### **Mapping of previously released drafts to the new structure of RDA**

The mapping of previously released drafts to the new structure of RDA is very helpful. It provides a good survey of the new structure and makes it easier to find instructions of the former drafts of Part A.

## **SECTION 2: RECORDING ATTRIBUTES OF WORK AND EXPRESSION**

### **CHAPTER 5 (General guidelines on recording attributes of works and expressions)**

In both chapters 5 and 8 the alternative is given either to record the identifying elements separately, as additions to the name as base access points, or as both. We appreciate the possibility to record the elements separately, thus having the choice to construct them as access points. We would like to point out that on the other hand additions are recorded in most formats as plain text with only restricted possibilities to search for them with variant forms or control them through identifiers. For instance the names of places used as additions for corporate bodies might have multiple variant linguistic forms. In our view the statements on how to record the identifying elements, for instance in 8.3 and 8.6 are not consistent throughout the whole draft.

#### 5.1 Terminology

##### 5.1.2 Title

Chapter 5 includes guidelines on recording attributes of works and expressions. In 5.1.2 the definition of the term "title" only refers to work not to expression. According to FRBR the "title of the expression" is a logical attribute of an expression. It seems that in the RDA model expressions are not considered to have titles of their own. This discrepancy should be explained at a more prominent position, and we suggest a more restricted captioning of 5.1.2 by "Title of work". We also recommend stating in 5.1.2 that the title of an expression is created by recording the preferred title of a work and other identifying elements of an expression.

Some members of the expert group felt that the definitions in 5.1.2 and 5.1.3 go in circles. We would like to ask if you could check the definitions once more.

##### 5.1.3 Access point

We suggest stating clearly in chapter 5.1.3 that access points for works and expressions are controlled access points.

We also suggest changing the wording in chapter 5.1.3.1 into "The term access point refers to a name, code, etc., **by** which information ... will be found."

We presume that an access point is considered to be a short representation of the entity whereas the authority record and/or the bibliographic record is a rich representation of the entity including the entity description and access points representing related entities.

If this assumption is true, the preferred access point is a unique textual citation form which gives access to the record for the entity, and thus has a complementary function to the entity identifier. The identifier enables machine-processible linking and search functionalities to be able to search with all variant names and names of related entities. The preferred access point, on the other hand, is the human-readable representation of an entity in the record for a related other entity.

If this assumption is true, too, variant access points are only needed in a system without rich descriptions (without authority records) for the entities represented by the access points, and/or without identifiers. In this case we regard it as indispensable that the variant access points for persons (families, corporate bodies) should be incorporated in the variant access points for the work. The growing number of possible variations in a large catalog is an evidentiary argument for working with authority files and identifiers.

#### 5.2 Functional objectives and principles

We suggest aligning 5.2.1 to the "Functions of the catalogue" mentioned in the IME ICC draft Statement of International Cataloguing Principles and adding the term "navigate".

#### 5.2.4 Representation

5.2.4 follows the IME ICC draft Statement of International Cataloguing Principles regarding the forms of uniform titles, but as mentioned in the background paper to RDA, Sections 2-4, 9, JSC agreed to submit the concerns, outlined in the document 5JSC/CILIP rep/1. We share these concerns and suggest reflecting this in the draft of RDA and changing the order in 5.2.4 so that the original title of the work is named first as already instructed in different chapters, e.g., 6.2.1.1, 6.18.0.3.1 throughout the whole draft.

The order in this draft of Section 2 (without a defined order):

- commonly used title or form of title in the language and script preferred by the agency creating the data
- original title of the work
- title most commonly found in resources embodying the work

The order suggested in the discussion & voting document of the IME ICC5 as of November 5<sup>th</sup>, 2007 and the voted preference in Germany:

- original title
- the commonly known title in the language and script of the catalogue when one exists for the resource
- title most frequently found in manifestations of the work

If we do not use international authority files, we think that the formulation "language preferred by the agency creating the data" is a problem. When each agency uses its own language how can we guarantee unambiguousness and an international data transfer?

#### 5.2.5 Language preference

We like to note that the wording "language and script preferred by the agency creating the data" could be difficult in those cases, where an agency belongs to a bilingual or even trilingual country (e.g. official languages in Switzerland are French, Italian and German).

#### 5.3 Required elements

We do not understand how RDA differentiates between "addition" and "identifying elements" used to identify the work (the entity). It seems to us that the term "addition" is used in variant denotations:

- as a closed list of required elements identifying the entity in an access point,
- as a standardized display form for these identifying elements as part of the access point,
- as a format requirement.

We fully agree that a short list of required elements is needed to be shown as part of access points, and we also agree that we should determine a fixed sequence in which they should be presented (though they would not be there in either case). But we do not agree to handle "additions" as a format requirement. We want to suggest treating "attributes" and "identifying elements" in the same way.

Chapter 5 includes general guidelines on recording attributes of works and expressions. Chapter 5.3 is captioned "required elements". We suggest giving the definition of "elements" not only in the document "RDA Scope and Structure" as of December 15<sup>th</sup>, 2007 but also within chapter 5.1 terminology.

We already learned that in the RDA model expressions are not considered to have titles of their own. How would the access point and the elements of an expression be designed in the different implementation scenarios? Would there be controlled access points both for works and expressions in all three scenarios?

In chapter 5.3 we miss some guidance in which cases a work or expression should be described more fully.

### 5.3.1

We feel that the term "preferred title" as used in 5.3.1 does not correspond to the definition given in 5.1.2.3. We would prefer more consistency at that point.

The wording of the footnote to "preferred title of the work" is "When the preferred title is recorded as part of the preferred access point representing the work, it is preceded by the preferred access point representing the person ...". We think that this information is too essential to be hidden in a footnote. We are asking for inclusion of this information in the main guidelines. One option would be to change "Preferred title for the work" into "preferred access point" as this is defined in 5.1.3.3 as a term that "refers to an access point ... that is constructed using the preferred access point for the person ... and/or the preferred title for the work." Another option would be to rename it by "preferred title for the work preceded by the preferred access point representing the person, family, or corporate body responsible for the creation when the preferred title is recorded as part of the preferred access point."

### 5.3.2

The element "subject" which is an attribute of a work or expression according to FRAD should be added as a required element. As not all works can be or need to be subject indexed, this element should be required if applicable. We also wonder why the elements listed in 5.3.2 solely are labeled as "attributes" whereas the footnote to 5.3.2 refers to them as "elements". At least the "place of origin" might – as well as by an attribute – be represented by a preferred access point for a related place entity. According to the document "RDA Scope and Structure" the elements with the type "role" represent "a part played or function fulfilled by an entity in relation to another entity or entities."

We welcome the possibility to record the identifying elements of a work or expression as separate elements or additions. But we think that the three possibilities of recording the listed elements as additions to the access points representing the work, as separate elements, or as both are too essential to be hidden in a footnote. We propose to include them in 5.3.2 and 5.3.3.

We do not understand the differences between the order regarding the elements listed in 5.3.1 / 5.3.2 and 6.4 to 6.10, and likewise the differences between the lists in 5.3.3 and 6.12 to 6.16. Some examples:

- according to 5.3.1 the identifier is one of two elements that has to be recorded. In 6.10 the identifier of work belongs to "other identifying element".
- the "other identifying elements" 6.8 "original language of work" and 6.9 "history of work" do not appear at all in 5.3.2.
- in 6.11 the "content type" is the first "other identifying element" of expressions, but it does not appear in 5.3.3

This is quite confusing and we recommend retaining and reflecting the order given in the general guidelines in chapter 5 throughout chapter 6.

We welcome the approach of distinguishing between elements required for the access point and elements required for a full description, but we would appreciate clear guidelines throughout the whole draft.

### 5.3.4

The elements listed in 5.3.4 seem not to be exclusive. The focus on cartographic materials seems more likely to be exemplifying. We would like to know why cartographic materials are described in such a detailed form whereas others (e.g. music) are not. Why are the special guidelines for musical, legal, and religious works in chapter 6 without any reference in chapter 5? And why are cartographic materials being described in the general chapter 5 and not mentioned in chapter 6 at all?

### 5.3.5

The instruction in 5.3.5 to include additional elements designated in chapter 6 as optional conflicts with those in chapter 6 to treat all the elements listed there as required when needed to distinguish the access point from others.

### 5.4 Language and script

We do not understand why the instructions on recording titles in the language and script in which they appear on the sources from which they were taken do not correspond to the parallel instructions in chapter 6.2.1.1.

### 5.5 General guidelines on recording titles for works

We discussed whether we need these general guidelines on capitalization, numbers, accents, and other diacritical marks at all. Could you please explain the background of these guidelines especially in the times of electronic catalogues? Chapter 6.2.0.2 indicates that the title to be used as the preferred title for a work after 1500 should be determined from resources embodying the work or from reference sources. In the case of first publication we suppose the title proper of the original edition would be the preferred title. More and more we will derive the descriptive elements from metadata and other digital sources of information directly taken from publishers and other parties in the publication workflow. Therefore we are in favor of retaining initial articles and capitalization as given in the resource itself as a precondition of automatic transfer of data. We are aware of the fact that this means abandoning any spelling regulations. Some members of our expert groups however, tend towards guidelines for capitalization for titles of works and expressions.

#### 5.5.1 Capitalization

##### 5.5.1.1

We suggest including a definition of the term "subdivision".

#### 5.5.4 Initial articles

We do not understand why we still need guidelines for omitting an initial article. In times of online catalogues this is unimportant. For the sorting in an OPAC or a bibliography the initial article can be skipped. We therefore ask for omitting chapter 5.5.4.

### 5.6 Preferred access points representing works and expressions

#### 5.6.4 Preferred access points to represent a part or parts of work

We would appreciate some guidance in which cases the part of a work is regarded as a work of its own.

### 5.7 Variant access points representing works and expressions

We presume that an access point is considered to be a short representation of the entity whereas the authority record and/or the bibliographic record is a rich representation of the entity including the entity description and access points representing related entities.

If this assumption is true, the preferred access point is a unique textual citation form which gives access to the record for the entity, and thus has a complementary function to the entity identifier. The identifier enables machine-processable linking and search functionalities to be able to search with all variant names and names of related entities. The preferred access point, on the other hand, is the human-readable representation of an entity in the record for a related other entity.

If this assumption is true, too, variant access points are only needed in a system without rich descriptions (without authority records) for the entities represented by the access points, and/or without identifiers. In this case we regard it as indispensable that the variant access points for persons (families, corporate bodies) should be incorporated in the variant access points for the work. The growing number of possible variations in a large catalogue is an evidentiary argument for working with authority files and identifiers.

### ● 5.8 Status of preferred access point

We think that recording the status of a preferred access point makes sense if it were consequently updated in the case of changes. We think that this would only be applicable in an authority scenario. The status might be quite useful for data interchange to give secondary information on the quality of the access point. But, if administrative metadata should be included in the instructions, it should be checked whether other types were useful, too.

In this case we would recommend adding two additional elements "definition of the entity":

- Definition
- Scope notes

As we consider the administrative elements as important information, definitions of the values should be added to the glossary.

Throughout the whole draft there is often the guideline to use an appropriate term from a list (e.g. 5.8.0.3; 6.2.7.2; 6.17; 10.4.0.3). Again, we would like to refer to the comments given to the revised chapter 3 last year. Concerning international data exchange, translations of terms in different languages should be accounted. Unambiguousness is important for data transfer, and a definition or even a code might help to bring different language terms together. Local systems should be expected to resolve a code into an intelligible term. In any case the wording "... or the equivalent in the language and script preferred by the agency creating the data" should be added in each relevant chapter.

### 5.9 Source consulted

We assume that this element is meant for authority records only.

#### 5.9.0 Basic instructions on recording sources consulted

##### 5.9.0.3 Recorded sources consulted

In order to reduce typing efforts and to improve unambiguous assignment we would need an administrative sub element both to the preferred title and, separately, to each variant title and to each identifying element.

##### 5.9.0.3.1 / 5.9.0.3.2

If the information is taken from a specific resource, we recommend adding a reliable address giving access to the resource (an identifier or a signature). We would appreciate some guidance in which cases to add a time stamp for gathering the information.

We would appreciate the opportunity to link to an URI.

We suggest making the brief statement of information found optional.

We recommend establishing a list of preferred reference sources (including authority files) and a sequence in which they should be consulted. (We are used to work in this way in the German authority files.) We also recommend using standardized short forms or codes for the main reference sources.

### 5.10 Cataloguer's annotation

In order to reduce typing efforts and to improve unambiguous assignment we would need an administrative element to the record as a whole, and administrative sub elements both to the preferred title and, separately, to each variant title and to each identifying element.

## CHAPTER 6 (Identifying works and expressions)

### 6.1 Constructing access points to represent works and expressions

#### 6.1.1 Preferred access point representing a work

##### 6.1.1.1 Works created by one person, family, or corporate body

With reference to the chapter overview in the Prospectus we noticed that the originating body is still announced to be handled in an own chapter. We would like to refer to the previous comment we gave to the revised chapters 6 and 7. We still think that an "originating body" is covered by the term "creator".

Referring to the example: "Rand McNally and Company. Historical atlas of the world": we think that Rand McNally and Company was considered to be the originating body according to Part A, rev. Chapter 6.3.2.0.1d. We acknowledge that the RDA approach to determine the responsibility for the resource takes much more regard of the intellectual content than we are used to in Germany. The German rules till now are much more aligned with formal elements of the source of information. We suggest more general instructions and prefer to omit the specific criteria for considering a corporate body to have responsibility for a work.

##### 6.1.1.2 Collaborative works

We assume that the preferred access point(s) for the creator(s) and the preferred title of the work may be recorded as separate elements. We miss an alternative that allows recording additional, but not all creators. We suggest renaming chapter 6.1.1.2 by "Works created by two or more persons, families, or corporate bodies."

There is no information included on the construction of a preferred access point when the work is presented as a collaborative work of a personal author and a responsible corporate body. As already noted in the commentary for the revised draft of RDA, Part A, Chapter 6 we want to point out that according to our German tradition a personal authorship generally takes priority over a corporate body authorship.

##### 6.1.1.2.3 - 6.1.1.2.7

We wonder whether there are other exceptions besides moving images and serials, and whether these exceptions are still justified.

We would like to know whether the guidelines given in 6.1.1.2.3 for moving images are also valid for musical works (operas, musicals, ballets, concerts, pop/jazz/rock titles). A reference to 6.17 should be added then. If so, we ask for differentiating between moving images of stage entertainments and movies based on a musical work (e.g. the picturized stage entertainment of the opera "Carmen" and the movie playing in the original setting with the singers Julia Migenes and Plácido Domingo and the director Francesco Rossi). It seems to us that video-clips (modern popular music) as an expression of pop/jazz/rock titles are missing in RDA.

The wording in 6.1.1.2.4 suggests that two or more collaborative creators of a serial, no matter whether be it persons, families, or corporate bodies, will not be chosen as components of the preferred access point, but only the preferred title of the work. We are not convinced of this approach. We also would like to know whether there are works, for which RDA assumes from the outset, that there is no personal author. Do the guidelines and instructions give room for variant access points with one or more creators? We assume that there might be access points for related persons, families, and corporate bodies.

##### 6.1.1.3 Compilations of works by different persons, families, or corporate bodies

It would be helpful to get information on the kind of criteria applied to distinguish between a "creator-compiler" and a non-creator-compiler. Which criteria make a compiler or editor a creator? We propose to include definitions of the terms compiler, creator, and editor.

#### 6.1.1.7 Additions to access points representing works

Is there any guidance on which addition should be made in which case, or are the additions listed under 6.1.1.7.1 meant to be “in the following order”?

The examples “Oxford economic papers (CD-ROM)” and “Oxford economic papers (Online)” seem to be displaced there as they are manifestations. We suggest adding the footnote “Additions to access points representing works are required when needed to distinguish an access point representing the work from another access point.” as mentioned in chapters 6.4 to 6.7 already in here and additionally in the relevant chapters.

#### 6.1.2 Preferred access point representing a part or parts of a work

There seems to be an inconsistency between chapter 6.1.2 and the former Part A, Chapter 7.7.2. According to 6.1.2 the access point for a part of a work should be constructed by adding only the title of the part to the access point representing the work as a whole. On the other hand, we understand the Part A, Chapter 7.7.2 as treating the part of a work as a discrete component of the larger work which is named by an access point of its own consisting of the combination of the preferred access point for the person, family, or corporate body responsible for the part of the work and the preferred title of the part of the work (cp. the examples in 7.7.2.1b.1). Does chapter 6.1.2 concentrate on such cases where the same person, family, or corporate body is responsible for both the resource as a whole and for the part embodied in the resource? Would it not even in this case depend on whether the part could be regarded as a discrete component, i.e. a work on its own?

#### 6.1.3 Preferred access point representing an expression

We do not understand why the elements listed in 5.3.3 and 6.1.3.1 differ from each other. Might related persons, families, and corporate bodies also be taken to distinguish different expressions of the same work? Which elements of an expression are required?

#### 6.1.4 Variant access point

We presume that an access point is considered to be a short representation of the entity whereas the authority record and/or the bibliographic record is a rich representation of the entity including the entity description and access points representing related entities.

If this assumption is true, the preferred access point is a unique textual citation form which gives access to the record for the entity, and thus has a complementary function to the entity identifier. The identifier enables machine-processible linking and search functionalities to be able to search with all variant names and names of related entities. The preferred access point, on the other hand, is the human-readable representation of an entity in the record for a related other entity.

If this assumption is true, too, variant access points are only needed in a system without rich descriptions (without authority records) for the entities represented by the access points, and/or without identifiers. In this case we regard it as indispensable that the variant access points for persons (families, corporate bodies) should be incorporated in the variant access points for the work. The growing number of possible variations in a large catalogue is an evidentiary argument for working with authority files and identifiers.

We noticed that the guidelines do not include information on constructing variant access points for expressions, but only for variant access points for works. In line with 5.1.2 we suggest a more restricted captioning of 6.1.4 by “Variant access point of work”.

Do the instructions give room for variant access points with or without one or more creators?

There is no information provided where variant access points should be held. The model underlying these guidelines is not clear. We assume that the basic rule is the use of authority files. If so, this needs to be mentioned at a prominent position and in each section.

## 6.2 Preferred title of the work

### 6.2.1 Works created after 1500

In chapter 9.2.1.2a.2 the time border lies before 1400, in 6.2.1 before 1500. We suggest establishing 1500 as the borderline in both cases as this year is regarded as the end of the Middle Ages in the European age. This is an established time border and reflects the state of the art of science and research. We also noticed that the examples given in chapter 6.2.1 are referring mainly to the Anglo-American sphere. We would prefer examples reflecting different language areas.

#### 6.2.1.1 General guidelines

As in some cases it is very hard and time consuming to find the original title we suggest adding the sentence: "If detecting the original title takes too much effort, the commonly known title in the language and script preferred by the agency creating the data can be taken."

### 6.2.2 Works created before 1501

#### 6.2.2.2 Classical and Byzantine Greek works

Referring to chapter 6.2.2.2.1, a well-established title in the language preferred by the agency creating the data should be chosen as the preferred title. The wording in 6.2.2.2.2 and 6.2.2.2.3 needs to be adjusted to a more general guideline as the language preferred by the agency creating the data would be German in our case, not English. To say:

- 6.2.2.2.2 If there is no such title in the language preferred by the agency creating the data, choose the Latin title.
- 6.2.2.2.3 If there is neither a well-established title in the language preferred by the agency creating the data nor a Latin title, choose the Greek title.

### 6.2.7 Compilations of works

#### 6.2.7.3 Other compilations of two or more works

In reference to the working paper 5JSC/LC/12 regarding additional instructions for musical works and expressions we also suggest reformulating chapter 6.2.7.3.1 into: "For a compilation consisting of two or more, but not all the works of one person, family, or corporate body, in a particular form or in various forms, record one of the following collective titles." We like to note that these collective titles need to be translated into the language preferred by the agency creating the data. We support the suggested addition of the following titles:

- Selected chamber music
- Selected operas
- Selected piano music

## 6.3 Variant title for the work

### 6.3.2 Other variant title

Whereas in 6.3 the element "variant title of a work" is classified as optional, the sub-element "other variant title" is required according to 6.3.2.3.1. We assume that the other variant title is meant to be recorded as a required element if you have decided to record the variant title of a work, at all. We find this quite confusing and we would prefer a different labeling.

## 6.4 Form of work

Will the terms for recording the form of a work be taken from a list of controlled vocabulary? If so, translations of the terms in different languages should be taken into account. As unambiguousness is important for data transfer a definition or even a code might help to bring different language terms together.

## 6.5 Date of work

### 6.5.0 Basic instructions on recording date of work

#### 6.5.0.1 Scope

The definition of the term "date of work" should be adjusted to the definition used in FRAD which is "The first date (normally the year) associated with the work [FRBR, modified]". The last sentence from the FRBR definition "In the absence of an ascertainable date of creation, the date of the work may be associated with the date of its first publication or release." needs to be added to 6.5.2. We assume that dates which are part of access points should be recorded in a standardized form.

#### 6.5.0.3 General guidelines

We like to note that there is an inconsistency on recording the date. In 6.5.0.3.1 and 6.26.0.3.1 the wording is "Record dates in terms of the calendar preferred by the agency creating the data" whereas in 6.12.0.3.1 "Record dates in terms of the Christian era. Add B.C. when appropriate. Record dates from 1582 on in terms of the Gregorian calendar."

According to 6.5.0.3.2 the date of the work should be recorded by giving the year or years alone. This is insufficient as it is already common practice to record specific dates for online publications. We suggest changing the wording into "Record the date of the work by giving the year or years alone or the specific date when appropriate."

### 6.5.1 / 6.5.2 Date of creation / Date of first publication or release

Both subchapters are labeled as required when needed to distinguish an access point from another. As "date of work" (chapter 6.5) is generally a required element it is not necessary to repeat the information in the subchapters.

We do have problems on defining the date of creation. Within the scope it is said that the date of creation is the year when a work was created, but what does "create" mean exactly? Is a work considered to be created when the author starts thinking about it or when he/she starts writing it? Is it after the manuscript is written? We would appreciate a clearer definition on which date is meant.

We also wonder whether the French Revolution or Buddhist calculation of times or the Jewish or Islamic calendars need to be considered.

## 6.6 Place of origin of the work

The country as the place of origin of the work should be preferred, ideally using a country code following ISO 3166-I.

### ● 6.10 Identifier for the work

We recommend including the authority control number of the particular national authority file as a required element. We also suggest including an example for an URI. Regarding musical works we suggest including the "ISWC – International Standard Work Code" and the "All Music Guide – AMG Work ID".

Examples:

ISWC: T-345.246.800-1

AMG Work ID: C 18747

German authority number for an uniform title for musical works: 300112068

### 6.11 Content type

According to our opinion, a list of content type(s) needs regular updating. With respect to international data exchange, translations of terms into different languages should be taken into account. Unambiguousness is important for data transfer and a definition or even a code might help to bring together different language terms. Local systems should be expected to resolve a code into an intelligible term.

### 6.12 Date of expression

As already mentioned in 6.5.0.3 we like to note that there is an inconsistency on recording the date. In line with 6.5.0.3.2 it would be necessary to record a specific date for an expression as well.

### 6.14 Version

We have difficulties to understand the term "version" as it is used in different ways within the draft of RDA sections 2-4, 9. In 6.2.3 the term appears for the first time as "Cycles and stories with many versions". In 6.14.0.1.1 the term "version" is defined as "Version is a name or term used to designate a specific realization of a work (e.g. a specific text, a specific version of a musical composition, etc.)". In the footnotes to 6.28.3.1.1 and 6.31.0.4.1 the wording is "Here, version is used in its narrow sense of a translation. The version from which another version is made is ignored so far as access points are concerned". The terms "version" and "expression" are even used side by side, e.g., in 6.31.0.4.4.

According to FRBR "variations" or "versions" are attributive for the same work and a new expression.

### ● 6.16 Identifier for the expression

For musical works the "ISRC – International Standard Recording Code" should be added. The "ISAN – International Standard Audiovisual Number" should be added for audiovisual works. The "ISWC – International Standard Work Code" gives identifier for a work and another identifier for each of its expressions.

Example:

ISRC: DEC610701239

### 6.17 Constructing access points to represent musical works and expressions

The working group for musical works prefers maintaining the additional instructions for musical works and expressions in one place. The structure of chapters 6.17 and 6.18 is very complex and could be arranged more clearly. Both chapters are barely comprehensible. We welcome the approach of a new structure as suggested in the working paper 5JSC/LC/12. If JSC decides to accept the new structure, we will comment the complete full draft in summer 2008.

We would like to note that the wording "part or parts of a musical work" seems not to be used correctly throughout chapters 6.17 and 6.18 as these terms refer to part sets as well. We propose to say "excerpt or excerpts of a musical work".

We also to suggest omitting "etc." in the headings as it is not clear what is hiding behind this term.

A note should be included in 6.17 – 6.22 that only western classical music and pop/jazz/rock is covered by RDA. Non-western music like, e.g., Indian Ragas is not covered by the guidelines for musical works and expressions. The relevant countries should bring in their specific instructions.

#### 6.17.1 Preferred access point representing a musical work

We miss guidelines on works of literature, which are partly set to music. If such a work is published completely on audiovisual carriers (e.g. DVD-Video or CD), the preferred access point should be the title. If such a work is published completely in print, the preferred access point should be the author with additional access points for the composer. For a publication including only the musical parts (regardless of which material), the preferred access point should be the composer with additional access points for the author.

We again would like to refer to the working paper 5JSC/LC/12. Page 7 gives a new heading "Collaborative works".

If two or more composers have collaborated in an adaptation of a musical work, the instructions given under 6.1.1.2 should be followed according to 6.17.1.5.3. There is no general guideline in chapter 6.17 or 6.18 indicating what to do if a work is a collaborative work of two or more composers with or without distinguishing origination of their collaborative work. We appreciate the introduction of a new headline "Collaborative works" in chapter 6.17.1 very much.

Examples for a collaborative work of two or more composers with distinguishing origination of their collaborative work under one title:

F.A.E

*(preferred access point for: F.A.E.: in Erwartung der Ankunft des verehrten und geliebten Freundes Joseph Joachim schrieben diese Sonate Robert Schumann, Albert Dietrich und Johannes Brahms)*

La guirlande de Campra

*(preferred access point for: La guirlande de Campra / par Arthur Honegger, Daniel Lesur, Roland Manuel, Germaine Tailleferre, Francis Poulenc, Henri Sauguet et Georges Auric)*

Example for a collaborative work of two or more composers without distinguishing origination of their collaborative work:

Strauss, Johann. Sohn (1825 - 1899). Pizzicato-Polka

*(preferred access point for: Pizzicato-Polka / Johann (Sohn) und Josef Strauss)*

#### 6.17.1.1 Musical works with lyrics, libretto, text, etc.

We assume that modern popular music pop/jazz/rock is covered by chapter 6.17.1.1. If so, it is necessary to include more examples for modern popular music. We understand that the preferred access point representing the work is constructed by combining the composer of the music and the preferred title for the work. Is that also right for pop/jazz/rock? In those cases the composer is often not known or it is difficult to identify the composer amongst a number of given names when the function or role "composer" is not added. In the former Part A, rev. Chapter 6.4 "performers" were mentioned as access points representing a specific expression of the work.

The general chapter 6.1.1.1 "Works created by one person, family, or corporate body" gives the example "Coldplay (Musical group). Parachutes" as preferred access point for this work. Is "Coldplay" as a musical group a composer or a performer in this example? The example is ambiguous because in the case of the title "Parachutes" the four members of "Coldplay" are the composers of the work and at the same time the performers of "Parachute" (on the expression level?).

Should there be a division in the construction of the preferred access point between modern popular music and western classical music (as it has been in AACR2 and the German rules RAK-Musik 2003)? It is not recommendable to declare the combination of composer and title as preferred access point in the field of modern popular music.

#### 6.17.1.5 Adaptations of musical works

##### 6.17.1.5.1

6.17.1.5.1d talks about "performances of musical works involving substantial creative responsibility...". We would appreciate a clearer definition of the phrase "substantial creative responsibility".

##### 6.17.1.5.4

Is there a better definition of "commonly cited", does it refer to traditions in vocal music?

6.17.1.10 Additions to access points with titles consisting of the name(s) of one or more type(s) of composition

We see difficulties in adding a "key". It is possible that the key is not indicated on the sound storage medium. It could be unclear whether a work could be tonal defined regarding late romanticists or composers from the 20<sup>th</sup> century, as they deal with the key in a free way. The key should only be added in those cases where there is no medium of performance or numeric designation.

6.17.1.11 Additions to other access points representing musical works

There seems to be an inconsistency in the examples given in 6.17.1.11.2. Where the wording is "Debussy, Claude, 1862-1918. Images, **piano not (piano work)**", the example "Granados, Enrique, 1867-1916. Goyescas (**Piano work**) *not piano*" is given. We recommend giving the examples in a consistent way and suggest using the first. In our opinion the differentiation between "piano" and "piano work" is a too subtle differentiation for the daily work and too confusing for the users. Or are the different terms used to distinguish a work from an expression?

6.17.2 Preferred access point representing part or parts of a musical work

6.17.2.3 Two or more parts

When constructing preferred access points for each of the excerpts of works according to 6.17.2.3.2, especially works on sound carriers have a lot of access points. We would like to have the possibility to construct preferred access points for a number of excerpts of works, but not necessarily for each. We suggest rewording 6.17.2.3.2 by "When identifying two or more unnumbered or non-consecutively numbered excerpts of a work, construct preferred access points for as many excerpts of work as appropriate following the instructions given under 6.17.2.2."

6.17.2.3.3

We would like to suggest reformulating the alternative as follows "When identifying two or more unnumbered or non-consecutively numbered parts of a work, add to the preferred access point for the work as a whole the term "excerpts". E.g. Rossini, Gioacchino: *Barbiere di Siviglia*. Excerpts.

6.17.2.4 Two or more unnumbered parts designated by the same general term

We recommend not expressing the numbers in parenthesis.

6.17.3 Preferred access point representing a musical expression

6.17.3.1 Arrangements, transcriptions, etc.

6.17.3.1.2

RDA makes no difference whether the composer arranged his own work or another composer arranged the work of a composer (see examples Ravel and Satie – composers that arranged works of their own). A user might find it helpful to see a differentiation at that point.

6.17.3.1.3

Regarding arrangements in the field of pop/jazz/rock the definition can be found in 6.17.3.1.3. The wording is:

a) an instrumental work arranged for vocal or choral performance

b) a vocal work arranged for instrumental performance

But these are only some examples of arrangements. Further examples of expressions of modern popular music are missing. How should they be treated?

Example:

Shakira. Objection. Album version (3:44)

Shakira. Objection. Radio edit (3:29)

Shakira. Objection. Karaoke version (3:42)

Shakira. Objection. Afro punk version (3:53)

Shakira. Objection. Live MTV unplugged (3:41)

Shakira. Objection. Extended remix (4:01)

(all expressions are distinguishable by different time durations; Shakira is the performer - not the

composer)

We think that it does not make sense treating possible arrangements in the field of pop/jazz/rock differently. We suggest adding the information on an arrangement (arranged) or the exact version (Radio edit; Karaoke version etc.) optionally.

The example "Townshend, Pete. Songs" includes a title for a compilation for modern popular music. There is no list of such titles given. This kind of preferred titles should be recorded in the preferred language of the agency creating the data.

#### 6.17.3.4 Vocal and chorus scores

We see "vocal and chorus scores" on the manifestation level not on the work/expression level. We would like to suggest transferring this chapter to the manifestation chapters of RDA.

#### 6.17.3.6 Translations

In general we welcome the guideline on adding the name of the language to the preferred access point according to 6.17.3.6.1. But it is very time consuming to do this in the field of music on videos because many languages are given (including subtitles). Therefore, in this case, it should be optional.

### 6.18 Preferred title for a musical work

#### 6.18.0 Basic instructions on preferred titles for musical works

##### 6.18.0.2 Sources of information

We suggest adding as a preferred source of information authority files as they are most reliable, or a predefined thematic work index (see 6.18.0.3). If the title cannot be found there, other resources should be consulted. We see no sense in distinguishing works created before and after 1500. We therefore suggest restructuring 6.18.0.2 in the following way:

- 6.18.0.2.1 Determine the title to be used as the preferred title for a musical work created before and after 1500 (in this order of preference):
- a) authority files
  - b) thematic index
  - c) reference sources
  - d) modern editions
  - e) early editions
  - f) manuscript copies

##### 6.18.0.3 Choosing the preferred title

There is an inconsistency between 6.18.0.2.1 and 6.18.0.3.1. The preferred title for a musical work should be taken from resources embodying the work or reference sources according to 6.18.0.2.1. In 6.18.0.3.1 the composer's original title in the language in which it was presented should be taken as the preferred title. Because of the internationality of western classical music and for the purpose of an international data exchange we ask for an internationally authoritative list of thematic indexes. An authoritative list of thematic indexes might already be mentioned in chapter 6.21.0.3c "Thematic index number". When choosing the preferred title, an authority file or the thematic index should be consulted first (in this order of preference). Additionally, there should be a list of authoritative reference sources defined by the agency creating the data.

##### 6.18.0.4 Recording the preferred title

We like to refer again to the working paper 5JSC/LC/12. Page 22 gives a list of types of compositions. We also think that a short internationally standardized list of types of compositions needs to be created with common terms which are easy to translate. But we also think that the list in the working paper 5JSC/LC/12 should be prolonged. Commonly used types of compositions should be included in such a list, like vocal types of compositions (e.g. "Mass", "Cantata"). The types of compositions where a medium of performance should be added need to be marked.

As mentioned in 5.5.4 and 11.2.0.6 we do not want to omit initial articles as instructed in 6.18.0.4.2g).

#### 6.18.1 Preferred title consisting solely of the name of one type of composition

We assume that the name should be recorded in singular when the composer wrote only one work of the type according to 6.18.1.1. We like to note that it can be time consuming, difficult and in some cases not obvious whether a composer wrote only one work of that type. We recommend using the plural in any case.

#### 6.18.2 / 6.18.3 Duets / trio sonatas

We suggest omitting these two chapters as they are covered by chapter 6.18.0.2.

#### 6.18.5 Compilations of musical works

##### 6.18.5.2 – 6.18.5.2.4

The terms seem not to be very clear. Their application might not be very practical. There is also the difficulty of translating those terms. It is not clear to us why "Keyboard music" is a broad medium, whereas "Brass music" and "Orchestra music" belong to a specific medium. "Wind music" is not included at all. Why does "String quartet music" belong to various types for one specific medium, whereas all other quartets belong to one type for one specific medium or various media?

##### 6.18.5.5

A combination of both guidelines should be allowed: to use the collective title „selected works“ and additionally separate access points for some of the works.

#### 6.19 Variant title for a musical work

##### 6.19.2 Other variant title

##### 6.19.2.3 Recording other variant titles

Would it not be right to record the preferred title as: Quintets, oboe, **violins (2)**, viola, violoncello, G. 431-436) according to 6.20.0.3.2?

#### 6.20 Medium of performance

##### 6.20.0 Basic instructions on recording medium of performance

##### 6.20.0.3 Recording medium of performance

##### 6.20.0.3.1

This guideline should be reworded into: "Record the medium of performance specifically in the language of the agency creating the data, following ...". (See also working paper 5JSC/LC/12 page 26/27).

##### 6.20.0.3.2

We would prefer adding the appropriate numeral if there is more than one part for a particular instrument or voices in any case, not only unless the number is otherwise implicit.

According to 6.20.0.3.2 the appropriate numeral in parentheses should be added after the name of that instrument. According to this the example "clarinets" on page 6-83 is wrong. This must be "clarinets (2)".

##### 6.20.0.5 Standard combinations of instruments

We cannot comprehend the instrument combinations made in 6.20.0.5.1. We think that it would be better to record the instruments for chamber music as these terms for standard combinations are not common to everyone especially not for each user.

##### 6.20.0.7 / 6.20.0.8 Groups of instruments / Instrumental music for orchestra, string orchestra, or band

We would prefer a clearer definition of these two chapters. What makes a group of instruments an instrumental music, e.g., strings and string orchestra? Is it a special amount of instruments?

#### 6.20.0.9 Solo instrument(s) and accompanying ensemble

In chapter 6.20.0.5 the example "woodwind quartet" was given as a standard combination of instruments. Would it not be right to name the "woodwind example" in 6.20.0.9 "woodwinds" according to 6.20.0.5?

### 6.21 Numeric designation

#### 6.21.0 Basic instructions on recording numeric designations

##### 6.21.0.3 Recording numeric designations

We generally want to record the opus number as a required element, as long as it is included in the thematic index.

### 6.23 Constructing access points to represent legal works

As already stated in the previous commentaries we still think that the instructions for legal works, religious works, and official communications are "Anglo-American centred". Some do not fit to the European legal system (or German law). We recommend abandoning chapters 6.23 to 6.27 with the additional instructions for legal works and integrating them into the general instructions. However, in case you want to retain those chapters we would like to point out especially the following:

#### 6.23.1 Preferred access point representing a legal work

##### 6.23.1.20 Reports of one court

##### 6.23.1.20b Reports ascribed to a report(s) by name

We see difficulties in the wording "... follow the accepted legal citation practice in the country ...". It seems to be very time consuming to research the accepted legal citation practice.

##### 6.23.1.22 Citations, digest, etc.

In 6.23.1.22.1 the wording is "If the person responsible for citations ... is prominently named in the resource ...". It would be helpful to get a definition what "prominently named" means. Is it only the title-page or the first screen?

##### 6.23.1.25 Indictments

As this chapter only refers to 6.23.1.23 and includes an example we suggest integrating "indictments" into 6.23.1.23.

### ● 6.24 Preferred title for a legal work

We recommend omitting "etc." in the headings as it is not clear what is hiding behind this term. It would be better to mention the appropriate kind of legal work.

### 6.26 Date of work

#### 6.26.0 Basic instructions on recording date of work

##### 6.26.0.3 General guidelines

The footnote to 6.26.0.3.1 refers to appendix K. This should read appendix H.

### 6.28 Constructing access points to represent religious works and expressions

We recommend abandoning chapters 6.28 to 6.32 with the additional instructions for religious works and expressions and integrating them into the general instructions. However, in case you want to retain those chapters we would like to point out the following:

#### 6.28.1 Preferred access point representing a religious work

##### ● 6.28.1.3 General instructions on theological creeds, confessions of faith, etc.

Regarding the JSC request on the use whether the distinction between one and more than one body should be retained in this chapter we recommend distinguishing not anymore. The more so as it could be difficult to decide in an individual case.

#### 6.28.1.4 General instructions on liturgical works

We think that constructing the preferred access point representing the work by combining the preferred access point for the church or denominational body and the preferred title as mentioned in 6.28.1.4.2 is not useful. We suppose that there are many liturgical works where an allocation to a specific corporate body is vague or ambiguous. Instead of that we suggest that a corporate body should be only added when constructing the variant access point and only if the allocation of the work to a church or denominational body is unambiguous.

#### 6.28.2 Preferred access point representing a part or parts of a religious work

##### 6.28.2.2 Part or parts of a sacred scripture

We consider recording a part or parts of a sacred scripture as a subdivision of the preferred title for the Bible as a disadvantage as it creates hierarchies. Furthermore, it seems to be an inconsistency that a work which is commonly identified by its own title, viz. single selections in 6.29.7.5, is not recorded as a subdivision of the preferred title for the Bible. Therefore, we recommend recording all titles of parts of sacred scriptures just as the "single selections" in 6.29.7.5, viz. not as a subdivision of "Bible".

#### 6.29 Preferred title for a religious work

##### 6.29.1 – 6.29.3 Sacred scriptures – Theological creeds, confessions of faith, etc.

We welcome the guidelines on choosing as the preferred title of sacred scriptures, apocryphal books and theological creeds, confessions of faith the title by which it is most commonly identified in reference sources in the language preferred by the agency creating the data.

##### 6.29.5 Catholic liturgical works

###### 6.29.5.1 Early works

It is incorrect to use the Tridentine title if a Catholic liturgical work compiled before the Council of Trent (1545-1563) has a close counterpart in a Tridentine work as instructed in 6.29.5.1.1. We recommend abandoning 6.29.5.1.1 and using 6.29.5.1.2 as the general guideline for early works.

##### 6.29.7 Parts of the bible

###### 6.29.7.2 Books

The example given in 6.29.7.2.2 is "Bible. Corinthians, **1st**". This is the Anglo-American spelling. We suggest changing the example into "Corinthians, **1.**" to a language independent spelling. According to our statement to 6.28.2.2 we omitted the preferred title for the Bible as we do not want to create hierarchies.

In view of the correct automatic sorting the use of Roman numerals for adding a chapter as instructed in 6.29.7.2.3 seems not to be useful. In accordance to the international customary quotation among theologians we recommend adding the chapter in Arabic numerals as well.

##### 6.29.8 – 6.29.10 Parts of the Talmud – Midrashim

We support recording the form of name found in the Encyclopaedia Judaica as the only reference source.

#### 6.31 Version

##### 6.31.0 Basic instructions on variant titles for religious works

###### 6.31.0.4 The bible and parts of the bible

The guideline to use a short form of the translator's name as mentioned in 6.31.0.4.2 seems to be problematic for us. The suggested short forms, e.g., Lamsa is not very widely known in Germany. We would prefer, e.g., Lamsa, Bible.

##### 6.33 Constructing access points to represent official communications

We recommend abandoning chapters 6.33 to 6.35 with the additional instructions for official communications and integrating them into the general instructions. However, in case you want to retain those chapters we would like to note that "generally known" is not clearer defined. We recommend choosing the short title by which the work is commonly found in reference sources.

### **SECTION 3: RECORDING ATTRIBUTES OF PERSON, FAMILY, AND CORPORATE BODY**

We assume that most of the guidelines included in section 3 refer to authority files. If so, this information needs to be given at a prominent position and in each section.

#### **CHAPTER 8 (General guidelines on recording attributes of persons, families, and corporate bodies)**

In both chapters 5 and 8 the alternative is given either to record the identifying elements separately, as additions to the name as base access points, or as both. We appreciate the possibility to record the elements separately, thus having the choice to construct them as access points. We would like to point out that on the other hand additions are recorded in most formats as plain text with only restricted possibilities to search for them with variant forms or control them through identifiers. For instance the names of places used as additions for corporate bodies might have multiple variant linguistic forms. In our view the statements on how to record the identifying elements, e.g., in 8.3 and 8.6, are not consistent throughout the whole draft.

#### 8.1 Terminology

##### 8.1.1 Person, family, and corporate body

The definitions of persons, families, and corporate bodies are given on a very abstract level and we miss practical advises. We would appreciate some guidance on which subtypes belong to these entity types, e.g., whether fictitious characters, divinities or legendary figures are regarded as persons, and how families and corporate bodies are distinguished. When the name of an entity includes the word "family", is it clearly a family then, but not a corporate body?

##### 8.1.2 Name

Some members of the expert group felt that the definitions in 8.1.2 and 8.1.3 go in circles. We would like to ask if you could check the definitions once more. If so, the definitions in 9.2.0.1.1, 10.2.0.1.1, and 11.2.0.1.1 need to be adjusted as well.

##### 8.1.3 Access point

We presume that an access point is considered to be a short representation of the entity whereas the authority record and/or the bibliographic record is a rich representation of the entity including the entity description and access points representing related entities.

If this assumption is true, the preferred access point is a unique textual citation form which gives access to the record for the entity, and thus has a complementary function to the entity identifier. The identifier enables machine-processible linking and search functionalities to be able to search with all variant names and names of related entities. The preferred access point, on the other hand, is the human-readable representation of an entity in the record for a related other entity.

If this assumption is true, too, variant access points are only needed in a system without rich descriptions (without authority records) for the entities represented by the access points, and/or without identifiers. In this case we regard it as indispensable that the variant access points for persons (families, corporate bodies) should be incorporated in the variant access points for the work. The growing number of possible variations in a large catalogue is an evidentiary argument for working with authority files and identifiers.

We suggest stating clearly that access points for persons, families, and corporate bodies are controlled access points. We also suggest changing the wording in 8.1.3.2 into "The term access point refers to a name, code, etc., **by** which information ... will be found."

#### 8.2 Functional objectives and principles

We suggest aligning 8.2.1 to the "Functions of the catalogue" mentioned in the IME ICC draft Statement of International Cataloguing Principles and adding the term "navigate".

### 8.2.3 Differentiation

We suggest following the broader principle "identification" as guided in 8.2.1b which also includes confirming that the person, family, or corporate body represented is the one sought, and accordingly changing the wording in 8.2.3.

### 8.2.5 Language preference

Is it correct that the alternative that the name / form of name should be the name / form of name in the original language and script of the content is not followed up in the following chapters? Please also see our comment to chapter 9.2.1.3.

### 8.3 Required elements

We welcome the possibility of recording the elements identifying a person, family, or corporate body as separate elements respectively as additions. As mentioned in 5.3.2 we think that the three possibilities of recording the listed elements as additions to the access points representing the person, family, or corporate body, as separate elements, or as both are too essential to be given in a footnote. We would like to question to include them in 8.3.2.

We wonder why the elements listed in 8.3.2 solely are labeled as "attributes" whereas the footnote to 8.3.2 refers to them as "elements". At least the element "place associated with the family" respectively with the corporate body might – as well as by an attribute – be represented by a preferred access point for a related place entity. According to the document "RDA Scope and Structure" the elements with the type "role" represent "a part played for function fulfilled by an entity in relation to another entity or entities". We prefer to incorporate identifying elements not only to differentiate the entities but also to identify the entity as the one searched for by the user.

As suggested in chapter 5.3 we want to treat "attributes" and "identifying elements" in the same way.

#### 8.3.1

According to 8.3.1 the identifier for the person, family or corporate body is a prominent and mandatory element. In the chapters 9, 10, and 11 the identifier is listed at the back end under "Other identifying attributes". Here the element is listed as required. This seems irritating to us.

#### 8.3.2

In 8.3.2 "additional identifying elements" are listed as additionally required elements to differentiate preferred names. This partly corresponds to 8.6.2 which indicates that in the case of same or similar names, elements should be added following the instructions for additions in the chapters 9, 10, or 11. But why do the chapters 9, 10, and 11 speak of "additions" whereas chapter 8 speaks of "elements"? We are confused about that, the more so as the lists in 8.3.2 are headed "Other identifying attributes ..." (see also the comment to 8.6.2).

We understand the lists in 8.3.2 as to include those identifying elements which in first line should be added to the name.

#### *Other identifying elements of persons*

We suggest adding the element profession/occupation to the list in 8.3.2. In our application we use the dates of the person and/or his/her profession/occupation as the preferred identifying elements.

We acknowledge from the introducing chapter "Background to the draft as a whole" that the JSC is going to reconsider whether titles, terms of address, and other designations are to be considered as parts of the name. We would prefer to treat these particles as components of the name. We would appreciate a clear distinction between the name element and other identifying elements.

According to the current German cataloguing rules the title of royalty and other designations of the person like the terms Saint and spirit, the titles of religious rank, and terms of address like Jr. or Mrs. are considered to be name components.

We consider a fuller form of name as a part of a variant name, not as an identifying element (see also the comment to 9.1.1.4).

We wonder what "other designation associated with the person" means. According to 9.7 only terms associated with the person's name are included. In contrast "other designation associated with the corporate body" means the whole of all elements which might be applicable to identify the body. We suggest providing such an extension for persons, too. Additionally we strongly suggest indicating the element type used as "other designation" and taking them from the list of "other identifying attributes" in chapter 9.

We wonder why a "prominent member of the family" which is indicated to be an identifying element for a family is not chosen, analogously, as an identifying element for the person (as related person). We also consider a related corporate body to which the person is affiliated to be a good identifying element.

#### *Other identifying attributes for families*

We miss the element "other designation associated with the family". There might be cases in which another element than those listed would be the best for identification.

We suggest adding "profession, occupation" to the list in 8.3.2 as there are many families in which family members follow the same profession (e.g. the Strauß family, the Bach family or the Cranach family). We additionally suggest proving the affiliation to a corporate body as an identifying element.

#### *Other identifying attributes for corporate bodies*

We suggest adding "type of corporate body" to the list in 8.3.2. The chapter "additions to access points for corporate bodies" (chapter 11.1.1.2- 11.1.1.8) starts with the case of bodies with names not conveying the idea of a corporate body. In the examples the type of the body is used always as an identifying element.

The element "prominent member of the family" seems to be a relationship between a related person and a family. The element "associated institution" seems to be a relationship between two corporate bodies. Both relationships should be included in FRAD.

#### 8.3.2 / 8.3.3 / 8.3.4

We understand 8.3.3 in that way that for persons, families, and corporate bodies who cannot be identified by the elements listed in 8.3.2 - even not by an "other designation" element in broad definition - the name has to be designated as undifferentiated.

We would appreciate if a clearer wording in 8.3.2 and 8.3.3 would affirm this interpretation. We suggest adding a sentence in 8.3.2: "Choose as "an other designation associated with the person, family or corporate body" an element or elements designated in chapter 9-11 as optional."

We expect that the lists in 8.3.2 will stay aligned to the subchapters "additions to access points" in the chapters 9, 10 and 11 and that the basket of "other identifying elements (attributes)" in chapter 9, 10 and 11 will hold on to contain - labeled as required or optional - all permitted element types.

We suggest deleting 8.3.4.

We want to record as many identifying elements as possible to clearly identify the entities and to support navigation. It should be an exception that none of the identifying elements can be ascertained and the name must be designated as an undifferentiated name.

In the German authority file for persons, we subdivide the identifying elements in two groups. Group one includes the date associated with a person in a standardized form (yyyy) and the profession or occupation, preferably as an identifier link to the respective authority record. Group two covers, e.g., period of activity, place of birth, place of death, dates associated with the person in a standardized form (dd.mm.yyyy), country associated with the person, affiliation, etc., as applicable preferably as an identifier link to the respective authority record. Two of these elements in group two are required as a minimum.

### 8.5 General guidelines on recording names

As already mentioned in 5.5 we wonder whether we need these general guidelines on capitalization, numbers, accents and other diacritical marks at all. Could you please explain the background of these guidelines especially in the times of electronic catalogues? We are in favor of retaining initial articles and capitalization as given in the resource itself as a condition of automatic transfer of data. We are aware of the fact that this means abandoning any spelling regulations.

### 8.6 Preferred access points representing persons, families, and corporate bodies

In reference to 5.6.2 and as it would be easier to read, we suggest paraphrasing 8.6.2 as follows: "In order to identify the person, family, or corporate body, add to the preferred name an element or elements such as a date, a place name, or other identifying element, following the instructions on additions to names of persons (see 9.1.1.1), families (see 10.1.1), or corporate bodies (see 11.1.1.1), as applicable."

### 8.7 Variant access points representing persons, families, and corporate bodies

We presume that an access point is considered to be a short representation of the entity whereas the authority record and/or the bibliographic record is a rich representation of the entity including the entity description and access points representing related entities.

If this assumption is true, the preferred access point is a unique textual citation form which gives access to the record for the entity, and thus has a complementary function to the entity identifier. The identifier enables machine-processible linking and search functionalities to be able to search with all variant names and names of related entities. The preferred access point, on the other hand, is the human-readable representation of an entity in the record for a related other entity.

If this assumption is true, too, variant access points are only needed in a system without rich descriptions (without authority records) for the entities represented by the access points, and/or without identifiers. In this case we regard it as indispensable that the variant access points for persons (families, corporate bodies) should be incorporated in the variant access points for the work. The growing number of possible variations in a large catalogue is an evidentiary argument for working with authority files and identifiers.

### 8.9 Date of usage

In order to reduce typing efforts and to improve unambiguous assignment we would need a sub element both to the preferred name and, separately, to each variant name.

In an authority file we additionally expect repeatable information on dates of usage (e.g. for marriage names).

What about an administrative subfield for former preferred names?

### ● 8.10 Status of preferred access point

As mentioned in 5.8 we think that recording the status of preferred access point makes sense if it were consequently updated in the case of changes. We think that this would only be applicable in an authority scenario. The status might be quite useful for data interchange to give secondary information on the quality of the access point. But, if administrative metadata should be included in the instructions, it should be checked whether other types were useful, too.

In this case we would recommend adding two additional elements "definition of the entity":

- Definition
- Scope notes

As we consider the administrative elements as important information, definitions of the values should be added to the glossary. According to chapter 5.8 translations of terms in different languages should be accounted. We prefer codes to bring different language terms together.

### 8.11 Undifferentiated name indicator

As instructed in 9.1.1.1.3 and 10.1.1.1.3 the undifferentiated name indicator only occurs for persons and families, not for corporate bodies. As chapter 8 includes general guidelines for persons, families, and corporate bodies, the information that the undifferentiated name indicator does not occur for corporate bodies needs to be given.

### 8.12 Source consulted

We assume that this element is meant for authority records only.

#### 8.12.0 Basic instructions on recording sources consulted

##### 8.12.0.3 Recorded sources consulted

In order to reduce typing efforts and to improve unambiguous assignment we would need an administrative sub element both to the preferred name and, separately, to each variant name and to each identifying element.

If the information is taken from a specific resource, we recommend adding a reliable address giving access to the resource (an identifier or a signature). We would appreciate some guidance in which cases to add a time stamp for gathering the information.

We would appreciate the opportunity to link to an URI.

We suggest making the brief statement of information found optional.

We recommend establishing a list of preferred reference sources (including authority files) and a sequence in which they should be consulted. (We are used to work in this way in the German authority files.) We also recommend using standardized short forms or codes for the main reference sources.

### 8.13 Cataloguer's annotation

In order to reduce typing efforts and to improve unambiguous assignment we would need an administrative element to the record as a whole, and administrative sub elements both to the preferred name and, separately, to each variant name and to each identifying element.

The example under 8.13.0.3.2 „Series issued also in Catalan“ seems to be misplaced there as the chapter deals with annotations regarding the preferred access point for a related person, family, or corporate body.

## CHAPTER 9 (Identifying persons)

### ● Background to each section of the draft

#### RDAs instructions requiring further review by the JSC

- RDA 9.2.14.1.3. AACR2 22.8A1 says a word or phrase denoting place of origin, domicile, occupation, or other characteristics that are commonly associated with a name should be preceded by a comma if the word or phrase is included in the name, e.g. "John, the Baptist". The JSC will consider whether to remove the instruction on use of a comma.  
→ We fully agree to this suggestion and recommend removing this instruction.
- RDA 9.2.5.4.1. The JSC will consider whether it is more in line with user behavior if names consisting of a surname and a term of address were formulated in direct order, e.g. "Miss Read" instead of the current "Read, Miss".  
→ We fully agree to this suggestion and recommend formulating in direct order.
- RDA 9.2.21.2, 9.2.22.2. Initial articles in phrases used as the names of persons. The JSC will further discuss whether these instructions can be revised to allow the retention of initial articles.  
→ We fully agree to this suggestion and recommend retaining the initial articles.

#### General comments to Chapter 9

It is quite confusing that instructions for persons from other language areas or countries are covered in different places / chapters. We suggest merging those guidelines which are valid for a certain language area or country at one place. There are additional instructions on recording names of persons in different language areas according to 9.0.1.3, but we do not comprehend the selection of language areas. If differentiating language areas, all language areas should be covered. We also wonder whether the IFLA publication "Names of persons" could have some kind of guideline character.

We would also like to note that it would be helpful when the guidelines for preferred and variant names were presented consistently in chapter 9 and Appendix F.

We recommend reorganizing the examples especially in this chapter. The differentiation between the form of name found in the resource, the preferred form and the variant forms is very complex and it would be much clearer to give the different forms next to each other. One example for a hyphenated surname:

<u>Name in the resource</u>	<u>Preferred name</u>	<u>Variant name</u>
Daniel Day-Lewis	Day-Lewis, Daniel	Lewis, Daniel Day-

#### 9.0 Purpose, scope, etc.

##### 9.0.2 Sources of information

We suggest adding as a preferred source of information reliable authority files.

#### 9.1 Constructing access points to represent persons

##### 9.1.1 Preferred access point

###### 9.1.1.2 Title or other designation associated with the person

We strongly recommend adding the element profession / occupation to the list of other identifying elements in 8.3.2, broadening the usage in 9.1.1.2 to be applicable to all persons, not only to those with names not conveying the idea of a person and labeling the element in 9.7 as "required".

Generally, we regard titles of royalty or nobility, the term "Saint" and titles of religious rank as special parts of a the name and not as identifying elements.

But: According to the German law on legal names, from 1918 on ranks of nobility (like Baron, Graf, Herzog, Prinz etc.) and titles of nobility (the prefix "von" and others) are forbidden as parts of a legal name. So we feel obliged to abstain from including the rank of nobility in the preferred names, not only for German persons but in any case. It is common practice to add the prefix "von" indicating nobility following to the forname, though - according to German law - for nowadays persons it is, if applicable, a part of a civic family name. An expert group preparing the changes to international rules recommended to continue this practice as it does not affect international interoperability. The term "Spirit" or a term indicating profession or occupation for a person is in our opinion an explanatory addition to the name of a person and may be regarded as part of the name.

#### 9.1.1.3 Date associated with the person

To improve international interoperability we suggest adding a date or dates associated with the person in a more standardized form and preferably the different components in different subfields. We fully agree to indicate dates of birth and death in specific subfields and to derive a presentation form for the period. Using the words "born" or "died" depends too much on the language; it would cause more effort to provide the appropriate terms from other languages and scripts.

#### 9.1.1.4 Fuller form of name

We discussed controversially whether a fuller form of name is nothing else than a variant name. One side thought that adding the fuller name helps to distinguish one person from another whereas the other side said that a date or profession helps much more for identifying a person. We tend to regard a fuller form of name as nothing else than a variant name defined in 9.3.0.1 as "a name or form of name ... that differs from the name or form of name chosen as the preferred name". We suggest omitting chapters 9.1.1.4 and 9.6.

### 9.2 Preferred name for the person

#### 9.2.0 Basic instructions on preferred names for persons

##### 9.2.0.2 Sources of information

###### 9.2.0.2.1

We suggest adding as a preferred source of information reliable authority files.

The numbering as 9.0.2.2.1 is wrong.

This paragraph is a copy of 9.0.2 (except 9.0.2.4). Why not just referencing it?

##### 9.2.0.3 Choosing the preferred name

We wonder whether 9.2.0.3.1 and 9.2.0.2.1. are consistent with each other. According to 9.2.0.3.1 the commonly known name for a person should be chosen as the preferred name. But what does "commonly known" mean - is the resource associated with the person the main source or the sources cited in 9.2.0.2.1 in descending order? It could be difficult to determine what is "commonly known". We neither want to count records nor to continuously change to the latest or fullest form. We would prefer to choose the name by using a list of predefined reference sources from the particular country including authority files (see also 8.2). See also our comments to 9.2.1.

##### 9.2.0.4 Recording the preferred name

We do not agree to use a "Who's who" as a main reference source as mentioned in the footnote to 9.2.0.4.2, because this kind of authoritative alphabetic list could be structured in a different way than our library rules. We suggest adding as a preferred source of information reliable authority files and a list of predefined reference sources.

The subheading "Choosing the preferred name", page 9-12 would be better before 9.2.0.3, page 9-10.

9.2.0.4.3 only refers to Appendix F3 regarding Chinese names containing a non-Chinese given name. We wonder whether "normal" Chinese names should be included, too.

#### 9.2.1 Different forms of the same name

If the form of a person's name varies in fullness, the form most commonly found has to be chosen as the preferred name, as mentioned in 9.2.1.1. We wonder what "most commonly found" means. We do not want to count records. There is no information included where the variation appears and in which depth research should be done.

#### General Guidelines

As a general guideline we propose that the form already established in the authority file preferred by the agency creating the data or the form verified in another reliable authority file should be taken as the preferred name:

If the name is new to the catalogue and the resource in hand is a newly published resource and cannot be found in another reliable authority file, it should be taken from the main sources of information in the resource in hand. If the name is new to the catalogue but not newly published and the name can be found in another reliable authority file, the preferred name of that authority file should be taken as the preferred name. If the name is new to the catalogue but not newly published and cannot be found in another reliable authority file, the name most frequently used in the resources in the original language and script of the work associated with the person should be recorded as the preferred name. Other forms of the name by which users may search (including other linguistic forms) are recorded as variant names. The preferred name of the person – except for those cases in which the person her-/himself changes her/his name - should only be changed in the case of mistakes or in the case of objections of the author or publisher.

We wonder why the general statement in chapter 8.4 to record names in the language and script in which they appear on the sources from which they are taken does not correspond with the instructions in chapter 9.2.1.

#### 9.2.1.1 Fullness

We want to choose the form most commonly found by using a list of predefined reference sources from the particular country if the forms of a person's name vary in fullness. As noted in 9.2.0.3 and 9.2.1 we do not want to count records.

#### 9.2.1.2 Language

We suggest expanding the time range in 9.2.1.2a.2 to 1500 as the Middle Ages are commonly dated till the beginning of Early Modern Times in the 16<sup>th</sup> Century.

We also suggest choosing as the preferred access point the form of name of a person (for persons who died before A.D. 1501) that has become well established in reference sources in the language preferred by the agency creating the data.

#### 9.2.1.3 Names written in a non-preferred script

According to chapter 8.2.5 the name or form of name should be the name or form of name in the original language and script of the content. In chapter 9.2.1.3 the form of a given name should be chosen according to reference sources in the language preferred by the agency creating the data. Surnames should be transliterated according to the table for the language adopted by the agency creating the data. The approach to record the original language and script seems to be missing. Or is this covered by the instruction in 9.2.1.3a.3 where the wording is "Record the other forms of the name as variant names"?

We recommend the use of international authoritative transliteration tables.

#### 9.2.1.4 Spelling

We do not agree that a variant spelling of a person's name is treated in an own chapter. We regard a variant spelling as nothing else than a variant name. Therefore we suggest omitting chapter 9.2.1.4.

#### 9.2.4 Individuals with more than one identity

In the German authority file for persons (PND) we do not link the real name with the pseudonym for persons of the 20<sup>th</sup>/21<sup>st</sup> century if we cannot determine the different identities in reliable reference sources (also reliable web pages like author's web page). Otherwise we use only one common authority record for all identities so that all publications are linked with this unique record. For persons living before the 20<sup>th</sup> century we normally can determine the variant identities easier and more guaranteed (in reference sources). In this case we use one authority record, too.

There are cases where one person uses a pseudonym as the interpreter as well as her/his real name as the composer within the same group of works and even on the same source of information (e.g. Muddy Waters / MacKinley Morganfield). How would we deal with these cases?

#### 9.2.5 General guidelines on recording names containing a surname

##### 9.2.5.1 General guidelines

##### 9.2.5.1.3

Regarding the "Mantovani" example: we suggest adding "..." (three points) to indicate that the forename is missing.

##### 9.2.5.1.4

"Omit terms of address from any name that includes a surname unless: a) the name consists only of a surname"

We suggest determining the forename in reference sources and recording the name including that forename. If the forename could not be found in reference sources, we suggest adding "..." (three points) in the field for the forename. See also example "Mantovani" under 9.2.5.1.3.

##### 9.2.5.5 Married woman identified only by her husband's name

We would like to note that the law relating to the use of name is different in Germany. It is possible that the family name is the woman's surname. We suggest adjusting this and the following chapter 9.2.6.4 in a more common way. Our suggestion is:

- 9.2.5.5 Married person identified only by her/his married partner's name
- 9.2.6.4 Married person whose surname consists of surname before marriage and married partner's surname.

#### 9.2.6 Compound surnames

##### 9.2.6.2 Established usage

We do not understand the example "Fénelon, Francois de Salignac de La Mothe-". "La Mothe-Fénelon" is a hyphenated surname ruled under 9.2.6.3 with another result.

##### 9.2.6.4 Married women whose surname consists of surname before marriage and husband's surname

The guidelines given in 9.2.6.4.1 on recording as the first element the first part of the compound surname (regardless of its nature) does also apply when the person's language is German not only Czech, French, Hungarian, Italian or Spanish. We recommend adding this information. In our opinion it is also difficult to decide which element is the husband's (or the wife's) name for names of all other countries.

#### 9.2.8 Prefixes hyphenated or combined with surnames

We wonder about the example "Debure, Guillaume". Recording the part of surname "Bure" as a variant name did not occur to us. (See also 9.3.7.3, page 9-48.)

#### 9.2.10 General guidelines on recording names containing a title of nobility

#### 9.2.11 Titles in the United Kingdom peerage that include a territorial designation

#### 9.2.12 Judges of the Scottish Court of Session bearing a law title beginning with *Lord*

We recommend moving the instructions on recording names containing a title of nobility in an appendix as these instructions seem to be very country-specific.

#### 9.2.15 Names including a patronymic

We like to note that patronymics are only mentioned in the context of given names. We miss guidelines on Russian names and ask for including examples for Slavian patronymics.

#### 9.2.16 Names of royal persons

We suggest bringing together all rules for names of royal persons in one chapter. It would be more convenient to have them at one place in the rules. We also miss guidelines for recording names of royal persons for certain countries, e.g., Chinese emperors' names.

We would like to add a note, that the names of royal persons can be recorded in the established form in the language preferred by the agency creating the date.

#### 9.2.17 General guidelines on recording names consisting of initials, or separate letters, or numerals

We would like to note that the initials are recorded even when it would be possible to resolve the initial form. The fuller form is recorded as a variant form. We prefer recording the fuller form as the preferred name.

#### 9.2.20 Phrase containing the name of another person

We would like to note that the instruction given under 9.2.20.2 on recording the phrase in direct order seems to be unusual. We suggest following the academic practice, and recording the name of the other person, e.g., Aristoteles (*not* Pseudo-Aristoteles).

#### 9.3 Variant name for the person

Is there a possibility to annotate the variant name form? We know annotations like "former name", "later name", "pseudonym" and "real name" in a standardized form as explanation for variant name form.

#### 9.3.2 Secular name

##### 9.3.2.3 Recording secular names as variant names

The example given under 9.3.2.3.1 "Ratzinger, John" is not correct. The right name is „Ratzinger, Joseph“.

#### 9.3.6 Alternative linguistic form of name

##### 9.3.6.3 Recording alternative linguistic forms as variant names

We recommend adding codes for the transliteration schemes and original scripts.

#### 9.4 Date associated with the person

For the purpose of an international data exchange we suggest recording the date of birth and date of death in a standardized form dd-mm-yyyy (or yyyy-mm-dd). We want to record the date associated with the person in any case if it is easily to detect from the item in hand or the Internet.

#### 9.4.1 / 9.4.2 Date of birth / Date of death

9.4.1.3.3 gives the instruction to record "**unknown**" if the person's actual, probable, or approximate year of birth is unknown. According to 9.4.2.3.2 "**not known**" should be recorded if a deceased person's actual, probable, or approximate year of death is not known. Is the different wording correct?

#### 9.4.3 Period of activity

We assume that the period of activity can be distinguished from the date of birth or death in a display format.

#### 9.5 Title of the person

We miss the elements "titles of rank or office" and "titles of honor" mentioned in FRAD.

## 9.5.0 Basic instructions on recording titles of persons

### 9.5.0.4 Titles of royalty

We wonder why there are already guidelines included in 9.5.0.4c.2 on making relationships between persons when there are separate guidelines on related persons in chapter 30. Do we need these guidelines in here?

9.5.0.4a) Persons with the highest royal status within a state, etc.

We suggest standardizing the title of royalty. Our suggestion (and current practice) is recording the elements in the following form: territory, title, numeration.

9.5.0.4b) Consorts of royal persons

We wonder why a consort of a royal person should be recorded by his or her title followed by "consort of" instead of recording his real title, e.g., "Prince of the Netherlands" instead of "Prince, consort of Beatrix, Queen of the Netherlands".

9.5.0.5 Titles of nobility

There are no guidelines included indicating which title of nobility is recorded when there is more than one. Are all titles of nobility recorded or just the highest rank as it is mentioned in 9.5.0.4 and 9.5.0.7?

9.5.0.8 Other persons of religious vocation

In our opinion the initials and/or abbreviations to a title of a person of religious vocation are not part of the name as instructed in 9.5.0.8.2.

## 9.6 Fuller form of name

As already noted in 9.1.1.4 we discussed controversially whether a fuller form of name is nothing else than a variant name. We tend to regard a fuller form of name as nothing else than a variant name, defined in 9.3.0.1 as "a name or form of name ... that differs from the name or form of name chosen as the preferred name". This means omitting chapters 9.1.1.4 and 9.6.

## ● 9.8 Gender

We discussed whether the list of gender designations is sufficient or not, but did not come to a result. On the one hand, we think that for cataloguing purposes the 4 designations listed in the RDA draft should be sufficient but, on the other hand, we can also understand that people may be offended when their gender is designated as "other" or "non applicable". By now, in the professional field these cases did not occur to us very often, hence we tend to join the majority.

## 9.11 Country associated with the person

As noted in chapter 6.6 we suggest recording the country in form of a code. We prefer ISO 3166-I which is also used in the German authority files.

## 9.13 Address of the person

We think that the protection of data privacy is an argument against recording the address of a person. It also does not seem to be practicable as persons move and the addresses would have to be updated.

## ● 9.19 Identifier for the person

We suggest including the authority control number of the particular national authority file as required element. We suggest including an example for an URI.

Example:

German authority number (Personennamendatei): 118540238

## **CHAPTER 10 (Identifying families)**

### 10.1 Constructing access points to represent families

We have some problems understanding the order of the additions to access points representing families. In 10.1.1.1.2 the guideline says: "... in the order listed" and gives an example. Following the order listed we would record the date associated with the family before the place associated with the family. The example given displays the opposite way.

As mentioned in 5.5.0.4 we would expect relationships in section 9 rather than in 10.1.1.5.

### 10.4 Type of family

#### 10.4.0 Basic instructions on recording type of family

##### 10.4.0.3 Recording type of family

We suggest including definitions for these types of family in the glossary. Especially the differentiation between the types "family" / "clan" and "royal house" / "dynasty" would be interesting. Concerning international data exchange translations of terms in different languages should be accounted. Unambiguousness is important for data transfer and a definition or even a code might help to bring different language terms together. In any case the wording "... or the equivalent in the language and script preferred by the agency creating the data" should be added.

#### ● 10.10 Identifier for the family

We suggest including the authority control number of the particular national authority file as required element.

## **CHAPTER 11 (Identifying corporate bodies)**

The guidelines in chapter 11 seem partly to be inconsistent with those in chapter 8 (especially concerning language and script) and partly conflicting in itself. We miss a clear general rule on how the corporate body should be recorded. We suggest omitting the many remaining specific case rules, and we suggest omitting all the remaining rules on punctuation and presentation formatting.

### 11.0 Purpose, scope, etc.

#### 11.0.1 Purpose and scope

In RDA we miss rules, especially those on corporate bodies, on how and in which cases the respective entities should be used as access points. We consider those application rules as essential for identifying the entity within the cataloguing process and within the catalogue. Without guidance on usage the metadata produced with RDA will not be interoperable. According to the present German rules, e.g., the works for which the executive body of a corporate body is responsible are not regarded as the works of the executive body, but as the works of the corporate body as a whole. According to this rule, executive bodies would not appear as access points in the catalogue. The background to this rule is that in most cases the executive body acts in the name of its superior body. Will it be left to application rules to decide how to catalogue in these cases? Another question yet open to us is whether a work, for which a not named number of persons related to a corporate body is responsible, should be regarded as the work of the corporate body itself or as an anonymous work.

The definition of the entity "corporate body" in footnote 1, identically worded in 8.1.1.4, seems to us not sufficient. There should be some guidance on how to deal with ambiguous entities like projects, vessels, buildings, areas etc.

We suggest providing a list of approved sub-types in paragraph 11.6 (type of corporate body). Additionally, we suggest adding definitions for the particular types of corporate bodies in the glossary.

We are not convinced of the approach to regard conferences as corporate bodies. We especially do not think it is justified to treat them as the creators of works. We tend to consider them as events which may have the character of works. We agree that there should be access points for conferences in the resource to which they are related to, but would expect the rules for them either in chapter 6 (works) or in chapter 15 (events).

We would welcome an over-all basic principle that the name of the corporate body should not be altered or modified artificially. In a web environment full of corporate web sites with users used to search for corporate bodies with keywords from the names we see no sense anymore in omitting components of the names.

#### 11.0.2 Sources of Information

We suggest adding as a preferred source of information reliable authority files. Additionally, we suggest adding the corporate body's web site to the preferred sources of information. We regard the web site as a good source both for the actual name of the corporate body and for its history.

### 11.1 Constructing access points to represent corporate bodies

#### 11.1.1 Preferred access point

We would welcome if the statement in the footnote to chapter 8.3.2, that the elements may be recorded separately, would be repeated in chapter 11.1.1.

We do not understand why the chapter does not start with the guideline for choosing and recording the preferred access point, i.e. the preferred name of the corporate body.

11.1.1.1 General guidelines on constructing preferred access points to represent corporate bodies  
11.1.1.1.2 indicates that the additional elements should be taken in the order listed. But the list starts with a special case.

#### 11.1.1.2 – 11.1.1.8

We assume that the elements listed in 11.1.1.2 – 11.1.1.8 (additions) should be preferred to those of the other identifying elements (attributes) in 11.4 – 11.12 labeled as optional (11.6, 11.8 – 11.11), in order to use the elements labeled as addition, i.e. as part of the citation form of the corporate body. The elements in 11.1.1.2 – 11.1.1.8 (additions) have to be aligned to those in 11.4 – 11.12 labeled as required (11.4 – 11.5, 11.7, 11.12). Is this correct? If yes, why not bringing together the addition elements with the required elements in 11.4 – 11.12?

#### Subchapter "Additions to access points representing corporate bodies"

The subheading has no entry in the directory. The elements listed under the subheading mean additions to names, not additions to access points.

#### 11.1.1.2. Additions to a name not conveying the idea of a corporate body

In the examples in 11.1.1.2 it is always the term for the type of the corporate body which is used as a "suitable designation". We suggest making this explicit and changing the rule in: "... add the type of the corporate body in the language...". We also suggest establishing a list of controlled terms to be used as terms for types of corporate bodies. We recommend adding "type of corporate body" to the list in 8.3.2.

#### 11.1.1.3 Place associated with the body

We would welcome a rule to record the place of a corporate body in any case if it is easily detectable from the resource or the corporate body's web site. It seems easier in usage to us to record the place from the outset instead of waiting until a similar name has to be differentiated. Additionally, it opens the possibility to search with the name of the place for all corporate bodies associated with it, not only for those which have to be differentiated. At last, it also opens the possibility to use controlled access points for the places, thus being able to search with variant place names, too.

#### 11.1.1.3.1 – 11.1.1.3.6

We would welcome an alternative to record the place of the corporate body in any case, if easily to find in the resource (see above).

#### 11.1.1.5 Date associated with the body

Does not a date (or dates) associated with a corporate body always assist in the identification of the corporate body if the name of the corporate body has changed?

#### 11.1.1.6 Type of jurisdiction

This paragraph should be referenced to 11.7.0.5 and – as it also indicates in which cases the level of jurisdiction should not be part of the name – also to 11.2.1.5d (conventional name of governments).

We think that the type of jurisdiction could be regarded as a part of the name of the government as well. Therefore we regard the type of jurisdiction as a required element, at least in those cases in which it is not part of the conventional government name. We would welcome an alternative to record the type of jurisdiction to the name of a government other than a city, a town, a state, or a country in any case.

Regarding the examples we assume that the paragraph refers to different aspects:

- differentiation of the same place in different times with different jurisdictions,
- differentiation between the name of a town or city and a broader jurisdiction with the same base name,
- differentiation between jurisdictions with the same base name differing in jurisdiction and coverage.

Are there other cases involved?

11.1.1.8 Number, date, and location of a conference, etc.

We suggest that the three elements number, date, and location should be recorded separately. Compare also our comments on conferences in 11.0.1.

The examples given in 11.1.1.8.1 contain the Anglo-American spelling of numbers, e.g., "Olympic Winter Games (21<sup>st</sup> : 2010 : Vancouver, B.C.)". For the purpose of an international data exchange we suggest standardizing the numbers to a language independent spelling like "Olympic Winter Games (21. : 2010 : Vancouver, B.C.)". This applies also to 11.2.8.4, 11.2.11.1.3, and 11.7.0.7.

When the sessions of a conference were held in two or more locations, each of the place names should be added according to 11.1.1.8.4. There could be conferences (e.g. musical festivals) that take place in a lot of locations. We would like to have the possibility to add only the names of the main places, but not necessarily each, or - in the case of country-wide events - abstain from recording a place. We suggest rewording 11.1.1.8.4 into "if the sessions of a conference, etc., were held in two or more locations, add as many of the place names as appropriate, at least the names of the main places. Alternative: In the case of country-wide events do not add any place name."."

## 11.2 Preferred name for the corporate body

### 11.2.0 Basic instructions on preferred names for corporate bodies

#### 11.2.0.1 Scope

##### 11.2.0.1.2

We suggest changing the wording similarly to: "If a body changes its name, it is considered to be a new entity, and a new access point including the preferred name of the new body has to be constructed." Explanation: The new access point might not only be used with resources associated with the body with the new name, but might also represent the new body as related body in other authority records, e.g., represent the new body as a later or even former body. (See also 11.2.2).

#### 11.2.0.2 Sources of information

The instruction is a copy of chapter 11.0.2.1. Why not just referencing to that paragraph?

We again recommend adding authority files as main sources of information and the corporate body's web site as a prominent resource and source to verify the corporate body's self-used name.

#### 11.2.0.3 Choosing the preferred name

##### 11.2.0.3.1

We suggest deleting the second sentence of the paragraph, at least. Nowadays, many names of corporate bodies are artificial names written in lowercase letters like eBay or ver.di (a big German trade union for the service sector), and even in languages using articles corporate bodies often are not used with articles. Capitalization and definite article are no definite proof and do not apply in every case. We also doubt whether the statement in the first sentence is appropriate in all cases. If conferences are still considered to be corporate bodies we would not base the decision that a conference is on hand on the wording of its title.

#### 11.2.0.4 Recording the preferred name

##### 11.2.0.4.2

The instruction is a variant form of chapter 11.0.2.1. Why not just referencing to that paragraph?

##### 11.2.0.4.3

We miss some advice on the difference between "related bodies" in chapter 32 and in the paragraphs 11.2.0.4.3 and 11.2.3 - 1.2.5. Is it necessary to make a difference?

#### 11.2.0.5 Names consisting of or containing initials

We suggest omitting this chapter. There should only be one general guideline: to record the name of the corporate body as it appears in the main sources of information: authority files, web sites, resources, reference sources, without any omitting.

#### 11.2.0.5.1

We suggest changing the last sentence into “In the case of doubt, record the form not chosen as the preferred name as a variant name.”

#### 11.2.0.5.2

We suggest deleting this paragraph. See also our comment to chapter 8.5.

#### 11.2.0.6 Initial articles

We strongly recommend abandoning this rule. We consider this rule to be a relict of the card catalogues and of computer systems without the ability to define non-filing components. Names must not follow mechanisms to prevent filing under an article but the mechanisms provided have to follow the characteristics of the names. Such rules bear exceptions and exceptions from exceptions – case law.

#### 11.2.0.7 Citations of honours

We strongly recommend abandoning this rule and adding an addition to the general rule “In the case of doubt, record the form not chosen as the preferred name as a variant name.”. If the citation of honour is part of the name and the name is constantly cited with it, why not recording it as part of the name? If the short form of the name without the citation of honour appears more frequently, and thus is taken for the preferred name, why not recording the name with the citation of honour as a variant name?

#### 11.2.0.8 Terms indicating incorporation and certain other terms

We strongly recommend abandoning this rule. We acknowledge that the legal form of a company is a very significant name component, too important to be ignored. Changes in the legal form often affect the body’s character more than changes in the wording of the name. It should be part of the citation form for the corporate body.

#### 11.2.0.9 Number, frequency, or year of convocation of a conference, etc.

We suggest omitting this rule. The fact that number, year, and place are added as identifying elements, ideally in a standardized form, must not mean that the name of the entity has to be truncated. The name might be searched by users including all these components. We also think that it is easier for the cataloguer not to be forced to think about whether or not omitting which parts of the name in which case. Number, frequency, and year should be additionally added as searchable identifying elements, irrespectively of the wording of the name.

#### 11.2.0.10 Transliteration

We do not understand why the instructions in chapter 11.2.0.10 do not correspond to those in 8.4. According to 8.4 names should be recorded in the language and script in which they appear on the sources from which they are taken, preferably in the language and script of the content. The form in the language and script preferred by the agency creating the data is only an alternative. Neither 11.0.2 nor 11.2.0.2 nor 11.2.0.4 nor 11.2.0.10 answers the question whether the name should be recorded in the original language. It is 11.2.1.3, at last, that indicates that the official language of the body should be taken. The paragraphs are not referenced to each other. Neither of the paragraphs opens an alternative to record the preferred name in the original script. We expect that the instructions in 8.4 should govern those in chapters 9, 10 and 11.

### 11.2.1 Different forms of the same name

#### 11.2.1.1 General Guidelines

We feel that the general guidelines in 11.2.1.1 do not reflect neither the reality of today’s catalogue nor the functional objectives and principles in 8.4.

As a general guideline we propose that the form already established in the authority file preferred by the agency creating the data or the form verified in another reliable authority file should be taken as the preferred name:

If the name is new to the catalogue and the resource in hand is a newly published resource and cannot be found in another reliable authority file, it should be taken from the main sources of information in the resource in hand. If the name is new to the catalogue but not newly published and the name can be found in another reliable authority file, the preferred name of that authority file should be taken as preferred name. If the name is new to the catalogue but not newly published and cannot be found in another reliable authority file, the name most frequently used in the resources in the original language and script of the work associated with the corporate body should be recorded as the preferred name. If the agency is not yet able to record in the original script, the transliterated form should be chosen as an alternative. Other forms of the name with which users may search (including other linguistic forms) are recorded as variant names. The preferred name of the corporate body – except for those changes which constitute a new entity – should only be changed in the case of mistakes or in the case of objections of the corporate body itself or of the publisher.

#### 11.2.1.2 Various spellings

We suggest omitting this chapter. It just follows the general rule.

#### 11.2.1.3 More than one language form of the name

There might be cases in which the official language of the body is not the language of the content of resources associated with the body, and there might be cases in which the official language is not the language used by the corporate body itself. We would suggest taking the name in the language, script, and form in which the corporate body uses it itself (web site, self-published resources) to be able to automatically take over these names. In the case that the name used by the corporate body itself is not discoverable, we would suggest taking the name in the official language. 11.2.1.3.2, 11.2.1.3.3, and 8.4 should be adjusted. 11.2.1.3.4 and 11.2.1.3.5 should be omitted (general rule).

#### 11.2.1.3.3

The example given under 11.2.1.3.3 “Schweizerische **Landesbibliothek**” is not correct. The right name is „Schweizerische **Nationalbibliothek**”.

#### 11.2.1.4 International bodies

What means “appear”? Appear in the resources, appear in reference sources, appear in newspapers? The footnote to 11.2.1.5a indicates that the names of international bodies should be recorded following this rule.

#### 11.2.1.5 Conventional name

Though 11.2.1.5.1 generally indicates that the conventional name of the body should be recorded in its own language only the types in 11.2.1.5e and 11.2.1.5f follow this rule. We suggest changing the wording into “in reference sources in the language preferred by the agency”.

The chapters 11.2.1.5.a – f are captioned as “exceptions”. In our view, these are not exceptions but special cases in which either the name in the language preferred by the agency should be chosen or additional special rules should find a place.

#### 11.2.1.5a Ancient and international bodies

We would welcome a clear definition of “ancient body”. Does it include only the types mentioned in the footnote or is it open to all types? Does it include bodies bound to a special age or only those who do not exist any longer?

We would also welcome a definition of “international body”, especially which types they include, e.g., are multinational companies, NGOs, etc., considered to be “international”? See also 11.2.1.4.

#### 11.2.1.5b Autocephalous patriarchates, archdioceses, etc.

Whereas patriarchates should be treated in the same way as governments, the names of religious jurisdictions of the catholic and protestant church should be recorded subordinately under the name of the religious body. We would welcome treating all religious jurisdictions in this same way as governments (see also 11.1.1.6). In any case, the rule should be placed close to chapter 11.2.16.

According to the examples, the name of the place is recorded in the language of the agency.

#### 11.2.1.5d Governments

The examples give evidence that the conventional names of corporate bodies should be given in the language preferred by the agency creating the data. Is that correct?

#### 11.2.1.5e Conferences, congresses, meetings, etc.

We suggest omitting this rule.

- 1) It does not fit into 11.2.1.5. According to 11.2.1.5. the preferred name should be taken from the "preferred source of information", not from a reference source, and the preferred name must not be a conventional name but a name that includes the name or abbreviation of the name of a body associated with the meeting, but only if the meeting is not subordinate to the body (11.2.1.5e2). Neither is this rule consistent with 11.2.1.5, nor is it consistent with the general rule to take the name most commonly found in resources associated with the body, nor is the exception in 11.2.1.5e2 reasonable.
- 2) The name of the related body could better be taken into account through a relationship to the related body.
- 3) 11.2.1.5e3 provides a broader rule concerning all conferences with specific names and parallel names as part of a series which should be relocated to another place.

#### 11.2.1.5f Local churches, etc.

According to 11.2.1.5 the conventional form of name should be identified in reference sources in the body's language. In Germany, we are used to distinguish between the name of the church, cathedral, etc. as a building and the name of the corporate body, i.e. the parish, parochial, congregation, or the like. We would like to ask how the different entities are distinguished in Anglo-American subject headings. We see no advantage to use the same names for different entities.

### 11.2.2 Change of Name

We suggest changing the wording similarly to "If a body changes its name, it is considered to be a new entity, and a new access point including the preferred name of the new body has to be constructed." Explanation: The new access point might not only be used with resources associated with the body with the new name, but might also represent the new body as related body in other authority records, e.g., represent the new body as a later or even former body. (See also 11.2.0.1.2)

### Recording names of subordinate and related bodies

In general, we would prefer that all names of corporate bodies would be recorded in direct order, in order to be able to take over machine-readable metadata from other sources, especially from the bodies themselves. Yet, the draft Statement of International Cataloguing Principles, March 2008, states in its chapter 6.3.3 that the name of the corporate body should be given generally in direct order, except when the corporate body is part of a jurisdiction or territorial authority or when the corporate name implies subordination, or subordinate function, or is insufficient to identify the subordinate body. So we would appreciate if the rules on names of subordinate and related bodies were aligned to the Statement of International Cataloguing Principles.

### 11.2.3 General guidelines on recording names of subordinate and related bodies

#### 11.2.3.1 General Guidelines

##### 11.2.3.1.4

We do not consider this rule as an exception.

11.2.3.2 Subordinate and related bodies recorded subordinately  
We would appreciate it not to omit any parts of the name.

11.2.3.2.3 – 11.2.3.2.9

We suggest using the wording of the Statement of International Cataloguing Principles instead of that in 11.2.3.2.3 – 11.2.3.2.9.

11.2.4 Joint committees, commissions, etc.

11.2.4.2

We would appreciate not to omit any parts of the name. Omitting leads to further exceptions and case laws.

11.2.5 Conventionalized names for state and local units of United States political parties

What is the sense of this rule? We would appreciate if names were not changed artificially.

11.2.6 General guidelines on recording names of government bodies

11.2.6.2 Government bodies recorded subordinately

We suggest using the wording of the Statement of International Cataloguing Principles instead of that in 11.2.3.2.3 – 1.2.3.2.9. We want to get away from lists of terms as the experience shows that they are not reliable in all cases and we want to get away from too many special rules driving the cataloguer into proving the whole basket of specific types instead of coming to a generic decision.

11.2.6.2.1

We would appreciate it not to omit any parts of the name. Omitting leads to further exceptions and case laws.

11.2.7 Government officials

11.2.7.2.2, 11.2.7.3.3, 11.2.7.4.2

According to the current German rules, we are not used to build access points for specific incumbents of an office. Instead of this, we are used to use the access point for the office without any differentiation in incumbency periods. We see no real advantages in the rules given in 11.2.7.2.2, 11.2.7.3.3, and 11.2.7.4.2 as the access points constructed following these specific rules seem to be not really fitting. Logically, the incumbency period might either be seen as an element of the corporate body, but then it should be every single voting period and not the whole duration; or as an element of the relationship between the person and the corporate body. This would mean to construct an access point for the related person in the authority record for the corporate body and to indicate the type and the duration of the relationship.

The identifying elements period of incumbency and name of the person are neither part of the list of other identifying elements (attributes) in 8.3.2 nor part of the "additions to access points" in chapter 11. The person is not represented by a preferred access point but only by his/her family name and not linked as a related person.

Especially, we are not convinced of those parts requiring a special presentation form or format for the single elements. We would appreciate it if these space-colon-space-rules were abandoned from RDA.

11.2.8 Legislative bodies

11.2.8.4 Successive legislatures

According to the current German rules, we are not used to add numbers and years to the name of a legislature, nor the numbers and years of sessions. We are not convinced of the advantages of these rules.

### 11.2.10 Courts

#### 11.2.10.1 Civil and criminal courts

##### 11.2.10.1.2

We would appreciate it not to omit any parts of the name. Omitting leads to further exceptions and case laws.

### 11.2.11 Armed forces

#### 11.2.11.1 Armed forces at the national level

We would appreciate it not to omit any parts of the name. Omitting leads to further exceptions and case laws.

### 11.2.14 Councils, etc., of a single religious body

#### 11.2.14.2

Why is here a special rule for the language form of the name of the body?

### 11.2.15 Religious officials

#### 11.2.15.1 / 11.2.15.2 Bishops, rabbis, mullahs, patriarchs, etc. / Popes

##### 11.2.15.1.2 / 11.2.15.2.2

According to the current German rules, we are not used to build access points for specific incumbents of an office. We are used instead to use the access point for the office without any differentiation in incumbency periods. We see no real advantages in the rules given in 11.2.15.1.2 and 11.2.15.2.2 as the access points constructed following these specific rules seem to be not really fitting. (See also under 11.2.7)

### 11.2.16 Subordinate bodies

#### 11.2.16.1 – 11.2.16.3

We suggest recording the name of a geographic area to which a religious body has jurisdiction not as a subdivision to the religious body but - analogously to 11.1.1.6 and 11.2.1.5b - by using the name of the place by which it is identified and adding the type of jurisdiction as an identifying element. The religious body should be related by providing its identifier and its preferred access point in the record for the geographic area, together with a relationship designator.

## 11.3 Variant name of the corporate body

### 11.3.0 Basic instructions on variant names for corporate bodies

#### 11.3.0.3 General guidelines

According to 11.3.0.3.2 there are corporate bodies which have established two or more identities. That could be done by taking the form of a person, a family, or a corporate body. We miss some guidance whether recording multiple identities has to follow the rules for the entity establishing the additional identity or the rules for the entity in whose form the identity is guised. We would expect a clarification in chapter 8.

##### 11.3.0.3.4

We suggest omitting the conditional clause.

### 11.3.1 Expanded name

We suggest omitting this chapter. 11.3.1.3.1 follows the general rule. 11.3.1.3.2 follows the general rule, too, if the form is taken from a source of information.

### 11.3.2 Acronym / Initialism / Abbreviated form

We suggest omitting this chapter. 11.3.2.3 follows the general rule.

### 11.3.3 Alternative linguistic form of name

We suggest cross-referencing this chapter to 11.0.2, 11.2.0.2, 11.2.0.4, 11.2.0.10, and 11.2.1.3.

### 11.3.3.3 Recording alternative linguistic forms as variant names

#### 11.3.3.3.1

##### *Different script:*

We suggest providing a relationship designator to that variant access point providing the name in original language and script.

### 11.4 Place associated with the corporate body

#### 11.4.2. Location of headquarters, etc.

We suggest dividing 11.4.2 into two separate chapters, one for the location of headquarters, the other for the geographic area of activity, as we think that the two types need different relationship designators.

#### 11.4.2.3 Recording location of headquarters, etc.

##### 11.4.2.3.1

Even an international body has a local place where it has its headquarter. The wording of the paragraph refers to the area of activity.

### 11.5 Date associated with the corporate body

We recommend aligning the rules for dates for persons, families, and corporate bodies.

#### 11.5.1 Date of conference, etc.

##### 11.5.1.3 Recording date of conference, etc.

##### 11.5.1.3.2

We recommend recording specific dates in a language-independent form.

### 11.6 Type of corporate body

We recommend adding the type of the corporate body to the list of other identifying elements (attributes) in 8.3.2 and to label it as required in 11.6. We suggest providing a list of controlled terms for types.

### 11.10 Field of activity

We suggest including the possibility to express the field of activity by a classification number.

### ● 11.12 Identifier for the corporate body

We suggest including the authority control number of the particular national authority file as a required element.

## **SECTION 4: RECORDING ATTRIBUTES OF CONCEPT, OBJECT, EVENT, AND PLACE**

### **CHAPTER 16 (Identifying places)**

#### 16.0 Purpose, scope, etc.

Purpose and scope of the chapter is limited as the use of subject is not yet included.

A definition of the term "place" can be found in the footnote. The wording is "Place, as used in this chapter, refers to a location identified by a name". We would prefer a clearer definition. Does it also apply for all kinds of geographical names, including geo-morphological names?

Places are used as additions to the names of corporate bodies according to 16.0.1.2. We like to note that places are also used as an identifying attribute for families and corporate bodies according to 8.3.2. Additionally, we would like to ask why places are not used for the place of creation of a work and the place of the (first) publication.

#### 16.2 Preferred name for the place

##### 16.2.0 Basic instructions on preferred names for places

###### 16.2.0.4 Recording the preferred name

We wonder why an identifying element (a related geographic entity) like the larger place or the jurisdiction to which the place belongs should be considered to be part of the name of the place. This is in contradiction to 11.2.1.5d where the conventional name of a government is defined as the name of the area over which the government exercises jurisdiction, without any indication that the name of the broader entity should be part of the name of the narrower one.

We strongly recommend omitting 16.2.0.4.2 and 16.2.0.4.3 and instead of this introducing a new chapter under "Other identifying elements (attributes)" indicating that the broader geographic entity is used as a required identifying element.

We also recommend omitting 16.2.0.4.4 as it is a punctuation rule; and punctuation should be machine-processed.

###### 16.2.1. Different language forms of the name

We suggest adding authority files as a preferred source of information.

We recommend cross-referencing 16.2.1 with 16.3.3.3.

###### 16.2.2 Changes of names

This chapter is too general and does not include in-depth guidelines. The whole range of changes of names is too complex to handle it in such a short way. How essential does a change have to be to create a new record? Are there cross-references between the former and the later name?

###### 16.2.3 Place names of jurisdictions

We strongly recommend harmonizing the rules to those for jurisdictions in chapter 11, and retaining just a reference in chapter 16 to the rules in chapter 11. On behalf of 16.2.3.1.1 see also our comments to 16.2.0.4.2 and 16.2.0.4.3.

###### 16.2.4 Places in Australia, Canada, Malaysia, United States, U.S.S.R., or Yugoslavia

We do not understand the exceptions for explicitly these states. Could you please explain this? The wording U.S.S.R. and Yugoslavia seems politically not correct, as these states do no longer exist. As mentioned in 16.2.0.4 it is not the European practice to record the larger place or jurisdiction.

#### 16.6. Identifier for the place

We suggest including the authority control number of the particular national authority file as a required element.

**SECTION 9: RECORDING RELATIONSHIPS BETWEEN PERSONS, FAMILIES, AND CORPORATE BODIES**

**CHAPTER 29 (General guidelines on recording relationships between persons, families, and corporate bodies)**

It is kind of confusing how RDA deals with relationships. Relationships are already included throughout Section 4. There is no information included in which cases relationships should be recorded and whether they are required or not.

## **APPENDIX F: ADDITIONAL INSTRUCTIONS ON NAMES OF PERSONS**

In general we would like to note that we do have much more detailed guidelines for the names from foreign language areas especially in view of Chinese, Indic, or Thai names. We miss, e.g., guidelines for Chinese religious names. The additional instructions in this chapter are too general.

### F.1 Names in the Arabic alphabet

#### F.1.1 Additional instructions on names in the Arabic alphabet

##### F.1.1.4 Order of parts

For “Kunyah” the wording of the definition is “typically a compound with *Abu* as the first word” but there are words beyond this like *Bō*, *Bū* (father of), or *Umm* (mother of). Examples for these words should be added as well.

There are also words instead of *Ibn* for a “Patronymic”. E.g. *Ben*, *Bin* (son of), *Bint* (daughter of), and *Sibt* (grandchild of). There is also the possibility of more than one patronymic e.g. *Sib.t-Ibn-al-`Ağamī*.