This response is organised into four parts:
   Part 1: General comments
   Part 2: Responses to issues raised in the cover letter
   Part 3: Comments on specific instructions
   Part 4: Notes on examples

Part 1: General comments

Commenting on 2-4 and 9 now is like commenting on the then chapters 6-7 in 2007 – it is difficult to be confident in saying anything without seeing (a) everything and (b) the finished sequence. The “Mapping of previously released drafts to the new structure of RDA” is very helpful, but it nevertheless asks for a good deal of imaginative prolepsis.

The biggest stumbling-block is in separating the ideas of description and access points from the ideas of FRBR tasks and then imagining each set of ideas in a real world setting. Many sentences in Sections 2-4 and 9 would seem to be written with Scenario 1 firmly in mind, rather than 2 or 3, and yet our mindset is firmly in 2 at present. Underlying this is the issue that we are approaching the tasks starting from bibliographic records when ideally we should be starting from a work level record.

It is probably, therefore, our strongest concern that the facility with which anyone will be able to identify, at least, works from expressions and the relationships between them, for example, will be grossly impeded by the lack of systems compliant with Scenario 1. On the other hand, we do recognise that it is only with the implementation of something as significant as RDA that system developers will feel inclined to move forward with the development of systems better geared to the sort of data structure outlined in Scenario 1.

We feel it currently impossible to make any confident judgment overall about either the clarity or consistency of RDA as the product as it now stands is very disjunct. We might have been able to make a better judgement if the June 2007 draft and Sections 2-4, 9 had been issued as a single document; unfortunately the current manifestation does not lend itself to ease of use.

The FRBR entities and user tasks are now clearly explained. We think some visual apparatus, however, such as is found in other documents (along the lines of those in RDA Database Implementation Scenarios) would greatly assist understanding. We would like to consider further the new organization of RDA. The new structure still privileges description
(manifestation and item) whereas we think it may make more sense to disperse the material exactly according to the logical order of the FRBR tasks/entities, starting therefore with work, etc. We hope such preferences may be accommodated by RDA Online.

What seems to be clear, though, is that RDA, as a document, is growing in complexity. Of course, CILIP is also too well aware RDA Online is intended as the primary means of access to the content of RDA, not a print version (or an e-equivalent). But this places a heavy emphasis on a product about which far too little information has been made publicly available – or made available early enough in the process of developing RDA as a whole.

**Examples.** CILIP wishes to reiterate a point it made in 5JSC/RDA/Part A/Chapters 6-7/Rev/CILIP response, and which is equally applicable to the current draft:

> In the context of the online RDA product, does it make sense for examples to be restricted simply to the point being made in an associated instruction? CILIP can see much merit in instructions being hyperlinked to versions of “full” records in which the example specific to a particular instruction can be seen in context. (This also obviates the need for most, if not all, of the explanatory text that is currently associated with examples since it will generally be quite obvious what’s going on.) Unfortunately, it isn’t immediately clear how this could be achieved without having different versions of the base text (or of the examples, at least) supporting the print and online version.

Single linear examples are often not at all helpful.

**Part 2: Responses to issues raised in the cover letter**

**5.8. Status of preferred access point.** Whilst recognising that consistency with other standards is welcome, CILIP suggests that ‘memorandum’ be dropped as its usage would be transitory. It is unclear how this status would be maintained, or even whether information about the use of data has any place in RDA. It’s not really “an indication of the level of establishment of the preferred access point”.

We are not even persuaded that ‘provisional’ and ‘preliminary’ are necessary distinctions. In the final analysis, an access point is either believed to be OK (and recorded as such) or to be treated with caution.

**6. Identifiers – which are required for works and expressions.** The term ‘required’ is ambiguous here. An identifier attribute is marked as required in both 6.10 and 6.16. Presumably, the question really is what examples, in addition to those already suggested in the draft (ISMWC and ISTC), should be explicitly given. We don't think RDA intends to mandate the use of a specific Identifier system - or does it? CILIP regrets it has no additional suggestions for appropriate identifiers.
6.24. **Preferred title for a legal work.** We favour dropping the 'etc. and prefer the second option.

6.28.1.3. **General instructions on theological creeds, confessions of faith, etc.** This seems to be an unnecessary complication. Acceptance by a church or denominational body might change over time. We see no need to distinguish.

**Section 3, Identifiers (p. 9).** Our comments on chapter 6 identifiers apply here also - the question seems to refer to Identifier value rather than the attribute _per se_. In addition we note that the ISPI is now the ISNI.

8.10. **Status of preferred access point.** CILIP thinks the values are adequate.

9.8. **Gender.** CILIP notes the existence of an ISO standard for precisely this and that the values aren’t identical. However, we think the RDA list is both adequate and better than ISO’s.

**Chapter 9.** RDA instructions requiring further review by the JSC (p. 11). Although the cover letter didn’t explicitly seek comments from constituencies on the items in this list, CILIP has a few to contribute to the JSC’s deliberations.

9.2.5.1.3/AACR2 22.4B2. The comma is only appropriate when the name has been inverted. As such, this is a display issue and therefore should not be part of the instructions.

9.2.14.1.3/AACR2 22.8A1. CILIP’s Rare Books Group welcomed the JSC’s intention to reconsider this matter, in line with common practice and encouragement throughout RDA to take forms of names from standard reference works. It noted that standard reference works do not have a comma, e.g. “Chrétien de Troyes”, “Christine de Pisan” (New Oxford Companion to Literature in French); “Wolfram von Eschenbach” (Oxford Companion to German Literature); John the Baptist (Oxford Dictionary of World Religions). CILIP endorses this view.

9.2.5.4.1. CILIP thinks it is more in line with user behaviour to retain the current “Read, Miss”, etc. Long tradition has conditioned users to look up names under surname. Were RDA to change, library cataloguing practice would moreover be at odds with practice in standard reference works, e.g. “Seuss, Dr” (Oxford Companion to Children’s Literature). Since, at least in the current data model, the bibliographic record would show the preferred form and variant access points would be derived from the authority records, the general view is that it does not matter. However, CILIP notes that staying with the status quo would save retrospective conversion.

9.2.21.2, 9.2.22.2. CILIP wonders why this is being raised only in the context of phrase headings and not, for example, in respect of corporate bodies where the issues would appear to be the same. Ultimately, the aim should be for consistency where possible – either retain
initial articles or drop them all. CILIP continues to prefer to allow coding to deal with filing issues.

9.5.0.8.1, 9.7.0.4.1/ 22.16D1, 22.13A. We appreciate that this is a complex issue, and also that what’s described is very much a western view. Looking at issue in terms of the three scenarios –
Scenario 1 being fully compatible, all identifier controlled – this issue would not matter;
Scenario 2 being system-based producing a user form of OPAC display – this issue would matter to legacy communities;
Scenario 3 being flat traditional – this issue would be relevant to other communities. It all really depends on the community adopting RDA

10.4.0.3. Recording type of family. There is ambiguity in the values – they overlap and are confusing. More consideration is needed (e.g. distinguish between clan and family). As things stand, it will be too easy for cataloguers to make mistakes which will lead to inconsistencies. CILIP also notes that it would not be possible to apply these values to the DC structure.

16. Identifiers – which are required. Our comments on chapter 6 identifiers apply here

Part 3: Comments on specific instructions

5.1.2. We did not find the definition of “title” sufficiently clear; the definition – “a character or group of words and/or characters by which a work is known” - could easily be equated with the old “uniform title”. We should like to see this term rephrased, with amplification and offer the following for consideration: “a character or group of words and/or characters, normally appearing in a work, that names that work”.

5.5.4.1. CILIP recommends inserting the word “preferred” before “title”, to further clarify that this instruction has nothing to do with transcription of the title proper.

CILIP again notes that the omission of initial articles can sometimes cause grammatical nonsense in inflected languages (e.g. E.T.A. Hoffman’s Der goldne Topf: if “Der” were omitted, the phrase should grammatically read Goldner Topf).

5.9.0.3.2, final paragraph: typographical error: correct “Elzever” to “Elzevir”.

6.1.1.2.2. The alternative provided for here (allowing for the inclusion of the name of more than one collaborator in the access point representing the collaborative work) is not found at 6.23.1.14, in what appears to be an equivalent situation

6.1.1.4.3 It is hard to know what is meant by "commonly cited", as it depends on information which is subjective. Cited by whom, and in what context?
6.1.1.6.3. How consistent is this with 9.2.21.1 concerning a characterizing word or phrase for individuals? For example, the statement of responsibility “by the citizens of Boston” causes access to be provided under title; but the statement of responsibility “by a physician” is given a name access point “Physician”.

6.1.1.7 and 11.1.1.7. While all the examples provided are able to be read by us without any difficulty, we feel there is an issue now, with the greater FRBRization of RDA, in the assignment of the additions. The additions in the examples are all “appropriate” and “suitable”, but we question whether we shouldn’t question them. These rules are governed by 5.2.3 and 5.2.4, which are perfectly clear in and of themselves but actually result in the creation of both a data “string” and, for example, a title that, independently, could differ.

We would therefore like to ask whether the “data” (assigned via rules governed by 5.2.3) and the title (assigned via rules governed by 5.2.4), which together produce one data/textual string should be clearly defined as a data element plus an element sub-type (as per 5JSC/Editor/3 Encoding RDA Data)? It isn’t clear to us whether these additions qualify now or should qualify in future as element sub-types. They appear not to do qualify as such in the table in the RDA Element analysis (5JSC/RDA/Scope/Rev/2) (e.g. in lines 224, 360), but we may be misunderstanding this whole area.

We believe this is an encoding issue, but not one we have seen covered in the mapping to MARC 21. If additions are element sub-types could there be a “loss of detail” in such a mapping (5JSC/RDA/Scope/Rev/2: Assumptions p. 7)? Retrieval is commonly affected by additions which regularly separate “headings” (as we call them now) in quite arbitrary ways (“Firm”, “Series”, etc.); their assignment is variously guided and difficult to control. It is arguable whether the NACO/SACO List of ambiguous entities should be adapted in this context as another vocabulary encoding scheme. It is odd that there is some nascent control, an awareness of this issue, but only for radio/television stations (11.7.0.4.2); why for nothing else? This element sub-type is separated as such in 11.7.0.8 (for example), but appears to have no link with an addition to a preferred access point.

6.2.1.1. ARLIS/CC has requested that CILIP notes its support for the continuation in RDA of the instruction in AACR2 25.3A, contra that found in the draft of the IME ICC principles – the latter appears to allow too many vagaries of interpretation. ARLIS/CC has a special interest in AACR2 25.3A/RDA 6.2.1.1 and appreciates the consideration of art works in 5JSC/CILIP rep/1: “there are clearly difficulties applying this [25.3A] to works that themselves have no ‘language’ (many works of art for example)”. The art library community has had for some years the LCRIs on 25.3A and 25.4A which say (both for before and after 1501), for “named individual works of art”:

Use as the uniform title the title found in English-language reference sources. If not found in English-language reference sources, use other reference sources. However, a reference source that routinely uses one language for all titles should not be used unless necessary. If the evidence is inconclusive, use (in this order of preference) the
The community has “accepted” this by default, in the absence of anything else, and because it is workable. It possesses, as 5JSC/CILIP rep/1 notes of AACR2 25.3A, a grounding in “facts”.

All that said, it is biased towards the English-speaking world and regularly produces oddities (Sunday afternoon on the island of la Grande Jatte; not Grande Jatte). It does, though, have the virtue of (usually) collocating multiple works by the same artist in user-friendly displays whereby variant (language) titles (aka cross references) will commonly be encoded as such and “preferred titles” will share the same language (say those of Michelangelo Buonarroti). These perhaps flawed but proven and functional interpretations of 25.3A have not filtered into RDA. We appreciate why this is (the inheritance of AACR2 and relative silence on 25.3A from the art library community), but would welcome expansion of 6.2.1.1 to include either a sub-rule or at least examples to better embrace the museum and archives communities (its stated intention on p. 4 of 5JSC/RDA/Sections 2-4, 9).

CILIP suggests that a sub-rule could comprise the LCRI, or at least its last sentence (as quoted above), regardless of whether or not the evidence is “inconclusive”. The prescription against reference sources that “routinely use one language for all titles” seems more to be heeded than whether the source is or is not an English-language one. There is a similar preference list of sources already in 6.2.2.1.1.

Whilst it may be that examples of art works will be included in Sections 7 and 10 (esp. Chapters 23 and 34) but we would welcome some amplification of 6.2.1.1, as it pertains to art works, to be made first.

6.2.1.3.1. It might be worth adding a reference here to 6.3.0.3 for recording the title of the London publication as a variant title.

6.2.7.3.1. For such compilations we would prefer to see “Correspondence. Selections”, “Essays. Selections”, etc., on the basis that the genre is the more important element. We recommend that this instruction should be deleted and that 6.2.7.2.3 should be amended, replacing the phrase "follow the instructions given under 6.2.7.3" with the phrase "add 'Selections'". This would also serve to keep the forms together in index displays.

6.18. IAML (UK & Irl), which has reviewed the music aspects of this draft as well as 5JSC/LC/12. notes the following:

The abandonment of "uniform title" as a particular kind of access point is doubly unfortunate, since the simple "title" causes ambiguity.

It has long been practice to distinguish:

1. title page transcription;
2. uniform title;
and, where a cataloguer believes that a form will be sought, but is not a valid form under the
instructions for 1 or 2,
3. title in a form provided by the cataloguing agency.

IAML (UK & Irl) believes it would be useful if the uniform title area were broken down into
three clearly distinct parts:
1. the uniform title itself;
2. the title of a part of the work, where there is a whole/part relationship’
3. terms descriptive of the manifestation or item, such as language terms,
forms of publication (vocal score, full score etc.)

Whilst accepting that this is properly the function of encoding, it feels it would be good to
make this distinction very explicit, as it would facilitate the design of databases, particularly
of authority records, which avoid much unnecessary data redundancy.

CILIP notes the structure of the instructions carried over from AACR do not mirror the more
general instructions in the draft 6.2-6.16, but this would be a major recasting in an area
whose future direction is very uncertain. Given that there is already a commitment to
undertake further work on the “special” rules carried over from AACR2, this is perhaps an
issue that JSC might wish to address after the initial release of RDA.

6.23.1.14.1. See 6.1.1.2.2

6.29.7.1. This change was enthusiastically received by one of the groups contributing to
CILIP’s review of Sections 2-4 and 9!

6.29.7.3.1. For groups of books of the Bible, under “Epistles of Paul”, we suggest listing
these – firstly for consistency (as the Gospels are listed), and secondly for clarity
(cataloguers might not know which the Pauline epistles are, and there is also space for
ambiguity in view of the lack of certainty as to whether the Epistle to the Hebrews was or
was not by Paul).

8.1.3. The distinction made in AACR2 between choice of access point and form of heading
was very useful, and the way in which they now seem to be conflated again may not be very
helpful to the user. Using the words "preferred" and "variant" here does this, because these
words can only refer to the form of the name, not to which access points are made.

8.3.2 and 8.6.2. When a name first appears in a catalogue record, the cataloguer cannot know
when and whether a second person will crop up with the same name. The phenomenon is
exacerbated for early printed books, owing to the indexing of book owners. CILIP would
prefer to recommend encouraging the addition to the preferred name of an element or
elements such as a date, a place name, or other distinguishing term in all circumstances. (cf
the optional addition at 9.1.1.3.2: “add a date or dates associated with the person even if
there is no need to distinguish between access points”).
Also, with regard to the listings of identifying or distinguishing attributes or terms – are these in an order of priority? For example, in 8.3.2, is “title” preferred before “other designation” which is in turn preferred before “date, etc.?”

8.5.1.1. Suggested rewording: “Capitalize the first letter of the first word ...” (clarity)

8.9.0.3.1: To have different sets of dates recorded for the different identities used by one individual is at one and the same time logically sound and potentially confusing.

8.11.0.1: The use of “indicator” here and elsewhere is potentially confusing, although its meaning is clear enough once one has read all of 8.11 (and equivalents elsewhere). CILIP was unable to come up with anything better, sadly.

Chapter 9. General repetitiveness. Some of this seems unnecessary (i.e. it doesn’t add anything to the instructions). For example, 9.1.1.4 is given in enough detail not to need (limited) amplifying at 9.6.0.3.

9.1.2.1.2. In the first sentence “if considered important for identification” is rather vague. For consistency, should not the same principles apply for variant access points as for preferred access points? In the examples, “Mills” clashes with other persons of the same name, so that the addition of the date of birth is “necessary” rather than “important”.

9.2.4. It might be better if this referred to "bibliographic" identity. We are not concerned with any other kind of dual identity.

9.2.5.1.4(a) Do these names really consist "only" of a surname? I should have thought that the preceding term (Mrs, abbé, etc.) was enough to say that this was not "only" a surname. This is something which has been carried over from AACR2 and which was never quite right. Suggested rewording:
   a) the name otherwise consists only of a surname

9.2.5.5.2. “Enclitic” is hardly in everyday speech; and the dictionary emphasis is very much on classical languages. Would it be helpful to replace “enclitic” by “suffix”?

9.2.10.1.4. The instructions says: “Do not include the term Saint as part of the name of a canonized person known by a title of nobility”, and refers to 9.7.0.4. This latter reads: “Record Saint unless the person was a pope ... or an emperor, empress, king, or queen”. This is a narrower definition of nobility than suggested by the words “title of nobility” (which includes “Sir” for earls, barons, knights, etc.).

9.3.4.3.1. Typographical error: amend “as a variant names” to “as a variant name”.

9.4.1.1-9.4.3.3.2: As dates form a single segment of the description, the compartmentalization into “date of birth”, “date of death” and “period of activity” was found confusing by some.
9.4.1.3.3 says “record unknown”, whereas for the date of death, 9.4.2.3.2 says “record not known”. Should the terminology be standardised?

9.6.0.3.1. This is one of those places where the presentation of the examples doesn’t immediately make clear what the end result of applying the instruction will be.

10.4.0.3. This instruction is positively tautological, defining "family" as a "type of family". Perhaps "familial grouping" or something that encompasses both kinship/consanguinity and affinity might be more appropriate.

11.1.1.1.2. It is not clear to us why this extra instruction is included here, anticipating the immediately following rule, 11.1.1.2. It was be seen why examples with additions are necessary in 11.1.1.2 (as indeed they were always in AACR2 24.1 from which they were omitted), but not why the instruction is interpolated. Examples with additions are covered by the encompassing instruction of 11.1.1.2. Different readings of 11.1.1.2 arose among different reviewers, one of us believing: “it seems that this rule is here for the instruction ‘in the order listed’. The problem is probably with the structuring - the rules that follow should be embedded within this (11.1.1.2.1 etc.)”

11.2.0.6.1 CILIP would like to see specific guidance for inflected languages in which presence or absence of an initial article affects the form of the words to follow: e.g.

Der Deutsche Akademische Austauschdienst

but

Deutscher Akademischer Austauschdienst

Possible approaches might include either an instruction to include the article in such instances (this is preferable, with library management systems configured to allow for non-filing characters), or else inclusion of the article in parentheses at the end of the name:

Deutsche Akademische Austauschdienst (Der)

11.2.1.5a. To match the content of the instruction, the caption here should substitute “or” for "and".

11.4.2.4. Establishment of place names is governed by chapter 16 (following the forward reference from 11.4.0.3). We can see nothing in 16.2 that permits, or provides instructions for creating, obsolete forms of place names (such as the Kristiania example provided here). Does this instruction need to make clear that the location associated with a corporate body may, on occasion, be a variant name for the place rather than – as one might expect – the preferred name?

11.7.0.7.1. Does the "form preferred by the agency" include the language preferred by the agency? We couldn’t tell. If it does, is that sufficiently clear?
29.5.03, In this context – and with a view to seeing Section 5 in its final form (incorporating Chapter 7 from the June 2007 draft) – we would like to draw the JSC’s attention to Attribution Qualifiers for Artists’ Names:
Worthwhile examples could be provided to “achieve an effective level of alignment between RDA and the metadata standards used in the museum and archives communities” (5JSC/RDA/Sections 2-4, 9 p. 4). Examples could also be included at 6.2.0.2 (June 2007 draft).

Part 4: Notes on examples

6.1.1.3.2 This does not illustrate the rule. Berry and Johnson is not a compilation of works, it is simply a catalogue of type specimens, and as such is just like a bibliography. It would be more appropriate as an example for 6.1.1.2.2.

6.2.1.2.1: We suggest that the final example, describing title proper of original edition as Treatyse of a galaut, be deleted. Assuming that y represents u with a tilde or macron above it, this is merely an abbreviation of galaunt (usually reproduced as galau[n]t), common in the manuscript period and carried over in the first two centuries of printed books.

6.2.1.3.1: This is a very American example; a British cataloguing agency would most likely receive the London edition first and therefore prefer Denmark’s day of doom. Specify that the cataloguing agency is in America

6.14.0.3.1: The examples for Fichte’s Wissenschaftslehre (1804) seemed ambiguous as given, with the explanation as “one version” and “another version”, and capable of improvement by a little amplification: e.g. “the first/second of x versions of Johann Fichte’s Wissenschafslehre which appeared in 1804”.

For an additional example of the name of version, we would suggest Piers Plowman, which exists in three distinct versions (all of which have been published), known as the A-text, the B-text and the C-text.

8.5.5.1: CILIP would welcome the provision of examples here, as there are for the contrasting circumstances allowed for in 8.5.5.2.

8.11.0.3.1. An example here would be welcomed.

8.13.0.3.2, final example: “Title flip-flops between ...”: Assuming initially that the Examples Group had spent too long in sandals at the beach, it was eventually possible to track down a definition – emanating from the US political scene, according to the OED – in which flip-flop had the meaning associated with it here, albeit only as a noun. However, in the interest of conventional formality (not to mention those who will be charged with translating RDA into other languages), we suggest substituting “varies”.
9.1.2.1.2. “Baker, George” also clashes with other persons of the same name, rendering this example incorrect. In the LC/NACO file there is a reference from “Baker, George, musician” to “Bouwens, Johannes”

9.2.5.7.1. An example would be helpful here and would suggest recycling Saint Thomas More from 9.1.1.1.2. However, we also suspect that it is a matter of policy not to provide examples for “negative” instructions such as this one.

9.2.6.6b.2. An example would be appreciated. We suggest “Spang Olsen, Ib” to tie in with the second example in 9.2.6.6b.1

9.2.10.1.4. An example would be helpful (see also 9.2.5.7.1).

9.2.20.2. Suggested additional example:

Veuve de Balthazar Arnoulet

9.5.0.5.1: As the point of this instruction is to show the placing of the title, it would be helpful to give the examples in the context of the entire name as well as in isolation. This could be done in parentheses beneath the examples.

9.6.0.3.1: See our comment for 9.5.0.5.1.

9.7.0.4. Examples would be helpful

9.7.0.5.1. An example here would be helpful, e.g.

Parker, Theodore (Spirit)

11.2.1.3.3. As the Schweizerische Landesbibliothek is in German-speaking Switzerland doesn’t this example fit into 11.2.1.3.1? If so, a different example is needed here.

11.2.3.2.5. Delete repetition of example (typographical error)

Jean and Alexander Heard Library. Friends of the Library

11.2.3.2.8. 4th example: The correct form of name is "University College London" without a comma. Since we appreciate that the example was taken directly from the LC/NACO file, perhaps a different one could be selected rather than persisting with a form that the institution doesn’t itself acknowledge.

11.2.3.3.1. 1st example: To highlight the point, it would be helpful to add a sentence of explanation, e.g. “free-standing name not dependent on American Library Association”.

11.5.2.3 and 11.5.3. For clarity and context, in these cases it would be helpful to see the entire heading; could this be recorded as part of the explanatory annotation?
29.5.03. We find it difficult to judge this rule as it lacks any examples. We would be keen for examples to be included from the art library community and particularly with reference to anonymous artist relationships.