The Library of Congress comments on the RDA draft chapters now out for review are below. They are given in this order: general topics LC wants to discuss in April 2008, general comments on the draft chapters, comments on specific chapters; in some cases, there are general comments for a chapter in additions to comments on specific instructions. Topics raised in the cover letter are listed in instruction number order preceded by the symbol ♦.

**Discussion Topics Suggested for April JSC Meeting**

LC strongly recommends that JSC schedule a discussion at the April JSC meeting on the two topics listed below before other aspects of the draft of chapter 6 are discussed; LC offers to prepare discussion papers on these two topics in early April before the meeting.

(1) A corporate body as a creator, the identification of an “originating body,” and the AACR2 21.2B categories.
   
   There are many overlapping comments in this document related to naming the work when a corporate body is involved. What does “responsible for” mean: as the resource presents the information implicitly or explicitly, as decided by the cataloger? Is the task solely mechanical, solely intellectual, or a combination? LC wants to restrict responsibility to the intellectual and artistic content.

(2) Primary responsibility indicated on resource.
   
   The JSC decided not to incorporate the AACR2 concept of “primary responsibility” in *RDA*. Considering this simplification again in the context of naming the work and the overall question in the previous paragraph of mechanical vs. intellectual decision raises other issues to be considered.

**General Comments on Drafts**

(1) Identification of elements. LC recommends adding an explanation about the
elements:
  - some elements are always in access points,
  - some elements may be in access points if needed to break conflicts or are optionally added to assist in identification, and
  - some elements are never in access points.

Also, it would be helpful if there were an indication (e.g., a code or label) at the instruction for each element so a user going directly to the element would know how that element could be used.

(2) **Presentation of exceptions.** LC recommends indenting, as a visual cue, any instruction that is an exception. Relying on the absence of an arrow at the beginning of an instruction is too subtle. Also, because sometimes there is more than one exception given in separate instructions and a user might go directly to an instruction other than the first one, LC recommends that the word “Exception” be given at the beginning of each instruction (i.e., use the same style as that for “Optional addition”).

(3) **Definitions.** LC asks how the differences in definitions for terms in these sections (e.g., 5.1.3) will be reconciled with definitions for the same terms worded differently in section 1 and in the glossary?

   Related to this concern is the presence of the footnote definitions in the chapters (moved to RDA from AACR2) containing wording “as used in this chapter.” Such footnotes may have been needed in the print AACR2 but aren’t needed in a Web tool where a user can “mouse over” the term to get the definition.

(4) **Punctuation in these chapters.** The JSC decided to carry over the AACR2 punctuation style to RDA. Some individual instructions include directions about punctuation. However, there are no general statements about punctuation in ch. 5 and ch. 8 or in the chapters on specific access points. AACR2 didn’t have punctuation rules in part II as it did in part I; the punctuation “rules” were assumed based on examples in AACR2. LC recommends the addition in RDA of a display appendix on access points to cover punctuation between elements and within elements when not already included in an RDA instruction.

(5) **Identification of element as required or optional.** LC has recommended rewording of many of the footnotes used to explain when a specific element is included in a preferred access point (always, only if needed to differentiate, optionally if helps identify). However, LC also recommends consideration of a more obvious and user-friendly way to present this information; perhaps a statement could be incorporated with or added after the label is presented other than buried in a footnote.

(6) **Tables of contents.**

   After seeing the prototype demonstration, we know the table of contents for a chapter will display along the left side of the screen in the Web tool and will be expandable. It wasn’t possible to tell if unnumbered breakdowns (e.g., “Name” and
“Other identifying attributes” on p. 11-1 and 11-2) will be included in that table of contents so the basic structure of each chapter is understandable from the contents; LC recommends that such unnumbered breakdowns be included.

In chapters 9-11, the X.2.0 basic instruction always has two sections: X.2.0.3, Choosing the preferred name; X.2.0.4, Recording the preferred name. However, the X.2.0 instruction is not expanded in the table of contents at the beginning of these chapters to show X.2.0.3 and X.2.0.4. Instead, for chapters 9 and 11, a user sees only the italicized center headings for various specific situations of recording the name without first seeing the basic instruction at X.2.0.4. LC recommends expanding the X.2.0 instruction in the tables of contents for chapters 9-11.

CHAPTER 5

General comment about scope of RDA section 2: LC recommends extending the scope to manifestations and items: access points for (1) manifestations and items for subject relationships, and (2) manifestations in different carriers for the same expression.

5.0: LC recommends adding a new instruction as 5.0.4 to refer users to the appropriate chapters in section 2.

5.1.3 subhead: LC recommends changing the subhead to “Access point for work or expression” to indicate the context for the definitions given here because the terms are defined differently in other chapters. Also see General comment (3) above.

5.1.3.2: This definition lacks the possibility of naming the work by using the name of the creator with the preferred title. LC recommends revising the wording as shown below:

The term access point refers to a name and/or title, term, code, etc., under which information pertaining to a specific work will be found.

5.2. General comment: Because the General Introduction has sections on objectives and principles, LC recommends just referring here to the introduction instead of repeating and rewording the objectives and principles here. Otherwise, the user discovers a restricted scope for the objectives and principles depending upon the chapter consulted.

5.2.1.a) LC recommends expanding “find information on that work or expression” to be clear we also would include finding the resource – the information is helping the user find the resources that contain that work or expression, which is more likely what the end user is after than just finding the information. This should include the idea of collocation of the manifestations that contain/embody the work or expression. It’s a key concept from FRBR that we must reflect in RDA.

5.2.4. LC recommends using the IME ICC term “generally accepted title” consistently in
chapters 5 and 6 to replace “commonly used,” “well-accepted,” “commonly known,” etc.

5.3. General comment on style: The use of italicized captions for listing of elements is confusing because they appear to be themselves additions and because some captions are the same as the element to be used. LC recommends deleting those italicized captions and listing just the elements.

5.3: LC recommends (1) replacing the “title” listing with “preferred access point for the work” and “preferred access point for the expression,” and (2) deleting the footnote. It is misleading to list only “title” and to mention the creator only in the footnote. (The footnote itself was incorrect because the conditional clause pertained to the preferred title rather than to a creator.)

5.3.2: Typo on third line: change “corporate body” to “or a corporate body”

5.3.4: (1) If it’s possible to choose not to describe "more fully," the elements listed aren't required. The elements listed reflect a category of content rather than the situation of a fuller description. LC recommends explaining that these elements are required for a certain type of content.

(2) LC notes that “content type” doesn’t appear at this position in the revised draft of the general introduction (it’s at what would correspond to 5.3.1 in this ch. 5 draft).

5.4: LC recommends changing the subhead to read “Language and script of the title of a work”

5.4.1: LC recommends revising the instruction as shown below for two reasons: (1) add a reference to ch. 2 to make the connection to the resources for people who in the Web tool go directly to chapter 5; and

(2) add clarification at the end of the sentence because many instructions in ch. 6 contradict 5.4.1:

Record titles for works in the language and script in which they appear on the sources (see 2.2) from which they are taken or as otherwise prescribed in the applicable instructions in chapter 6 (e.g., 6.2.2.1.1, 6.2.2.2.1).

5.4.2: LC recommends clarifying the use of the transliterated title by revising the wording as shown below:

Record a transliterated form of the title either as a substitute for, or as a variant title in addition to, the form that appears on the source.

5.4.3 and 5.4.4: “identifying attributes” and “descriptive attributes” are new concepts. If these terms are retained, LC recommends that they should be used as the names of ch. 6 and ch. 7 (e.g., “Identifying attributes of works and expressions”).
5.4.4: Re: descriptive attributes. In RDA aren’t we calling these the “elements” identifying a work or expression? How do we clarify the difference between attributes and elements/subelements? Aren’t the same?

5.5.0.1: LC recommends revising this instruction to refer to the possibility of using a local style manual or capturing already-existing data, etc. (as noted in ch. 1).

5.5.1.1b.1: LC recommends this simplification shown below:

If a title for a work begins with a corporate name with unusual capitalization, such as names without an initial capital letter, or with a capital letter or letters following a lower case letter or letters, follow the capitalization practices of the body.

5.5.2.1: (1) LC recommends adding wording at the end of the sentence to coincide with LC’s recommendations for 6.3.1 and 6.3.2 to add instructions about giving variant access points:

When recording a title for a work, record numbers expressed as numerals or as words in the form in which they appear on the source of information or as otherwise prescribed in the applicable instructions in chapter 6 (e.g., 6.3.1 and 6.3.2).

(2) LC recommends adding an instruction about giving other forms as variant access points.

5.5.3.1: LC recommends adding an instruction for other forms as variants because forms with or without diacritics may be indexed directly in some systems.

5.5.3.2: LC recommends deleting this instruction because it is essentially the same as the second sentence in 5.5.3.1.

5.5.4.1: LC notes that a word is missing: “… unless the title for a work is to be accessed …”

5.5.5.1: LC recommends adding wording that the form not chosen can be a variant access point.

5.5.6.1: LC recommends deleting the parenthetical explanation for the last example; the same explanation could have been given for other examples for this instruction.

5.6.1 and 5.6.2: LC recommends deleting 5.6.1 and replacing it with 5.6.2 as reworded below. LC included “first-named” in the suggested rewording of paragraph a), even though the reference to 6.1.1.1-6.1.1.6 addresses that concept, because it would be helpful information in this introductory chapter.

5.6.1 Construct the preferred access point representing the work by
combining (in this order):
   a) if applicable, the preferred access point for the first-named person, family or corporate body responsible for the work (see 6.1.1.1-6.1.1.6)
   b) the preferred title for the work (see 6.2).

5.7. subhead: LC recommends changing the subhead to “Variant access points representing works and expressions” because LC assumes there is no such concept as a variant access point for an expression. Is that a correct assumption? (LC notes there are no instructions in ch. 6 for variant access points for expressions.)

5.7: LC has questions about this section:
   (1) How is the situation handled for a work named only by the preferred title (e.g., a motion picture) when there is a person, family, or corporate body (possibly more than one) connected to the work? As an access point? As a future link?
   (2) How are variants appearing on a manifestation (e.g., spine title on a book, title on a container) to be addressed? Only as access points on the bibliographic record for a manifestation? But, some works (e.g., a monographic series) may not have a collective bibliographic record for the resource as a whole; a series authority record now includes references for variant access points appearing on the manifestation.

5.7.3: LC suggests revising the wording to “Make additions to the variant access point …”

◆ 5.8.0.3.1: LC recommends deleting “memorandum” and replacing “provisional” and “preliminary” with one term (perhaps “not fully established”); reasons for these suggestions are given below. LC also recommends adding an instruction to say to change to “fully established” when another resource is received that provides more information.

   Reasons for LC’s suggestions about “memorandum,” “provisional,” and “preliminary”: We realize these are lifted from the MARC 21 format, but perhaps JSC could consider whether we need to perpetuate using all that MARC allows. Most of them are historically there to accommodate card conversion issues. LC questions the long-term need of distinguishing between “provisional” and “preliminary” (not always clear to cataloguers). If JSC decides to keep “provisional” and “preliminary,” LC recommends rewording the explanations to avoid current confusion:

   provisional
   (for an access point that is based on a resource but has inadequate information to confirm the fully established form)

   preliminary
   (for an access point taken from any source without the resource described at hand and where the rules followed for the preferred access point may be unknown)

5.9.0.1.1: LC recommends generalizing the wording to cover communications with persons (e.g., authors, composers, employee of corporate body, family member) as
sources. Perhaps “Sources consulted are publications, reference sources, individuals, etc., used in establishing …”

5.9.0.3.1: (1) Should there be an explanation of style and punctuation used in the examples? (It is essentially what appears in MARC 21 documentation for the 670 field.)
(2) 5.9.0.3.1 doesn’t specify giving the location of the information found although most of the examples do so.

5.9.0.3.3: LC recommends either making the equivalent of the MARC 21 675 field (“source not found”) be an element or revising this instruction to say to include the indication “no information found.”

5.11: LC notes that this chapter lacks an instruction for making annotations for the end user. Many of the examples in 5.10 instructions would be helpful public notes (e.g., “Not the same as …” and “All reports published …”)

CHAPTER 6

◆ Earlier LC comments on choice of “primary access point.” LC’s main concern from our earlier response is the need for a discussion of originating body as creator [see 6.1.1.1 and 6.1.1.2 below; topic also to be covered in proposed discussion paper].

General comment: LC recommends using the IME ICC term “generally accepted title” consistently in chapters 5 and 6 to replace “commonly used,” “well-accepted,” “commonly known,” etc.

6.0.1.5: LC recommends moving this statement to the General Introduction because it relates to the overall topic of applying RDA.

6.0.2: LC notes that this same information also appears in 6.2.0.2. To avoid unnecessary repetition and to simplify the wording for 6.0.2, LC recommends the following rewording for 6.0.2 (no strikeouts or double underlining used):

6.0.2.1 Determine the title to be used as the preferred title for a work according to the instructions in 6.2.0.2.
6.0.2.2 Take variant titles from sources according to the instructions in 6.3.0.2.
6.0.2.3 Take information on other identifying attributes of works and expressions from any source.
6.0.2.4 When determining the preferred title or taking other information from a manifestation embodying the work or expression, follow the instructions in 2.1-2.3 concerning basis for description, sources of information, and title.

6.0.2.2 (if LC’s wording for 6.0.2 above is not adopted): In first sentence, LC
recommends changing the wording to “modern reference sources”

6.0.2.3 (if LC’s wording for 6.0.2 above is not adopted): LC recommends changing the wording to “from any source reference sources”

6.1.1.0.1: LC recommends simplifying the statement by rewording it as shown below:

Construct the preferred access point representing an original work or a new work based on a previously existing work following the instructions given under 6.1.1.1-6.1.1.6.

6.1.1.0.2: LC recommends changing the wording as shown below to avoid the use of term “special types.”

For instructions on constructing access points representing special types of works, see 6.17.1 (musical works), 6.23.1 (legal works), 6.28.1 (religious works), and 6.33.1 (official communications).

See separate instructions for constructing access points for the following:

- a) musical works (see 6.17.1)
- b) legal works (see 6.23.1)
- c) religious works (see 6.28.1)
- d) official communications (see 6.33.1).

6.1.1.1 and 6.1.1.2: [to be covered in the proposed discussion paper] If the JSC’s intent is to carry forward the AACR2 practice of 21.1B2 to identify certain categories of works by their content (e.g., administrative reports) and name them by using the name of the originating body, such instructions are missing here. AACR2 21.1B2 applies to all modes of issuance; its RDA counterpart would need to be either a separate category or appear under both 6.1.1.1 and 6.1.1.2. If there is more than one concurrent originating body, the AACR2 practice is to enter under the first-named body.

6.1.1.2.4 does not represent the AACR2 practice even for serials because it ignores those categories of serials falling under AACR2 21.1B2. Deleting 6.1.1.2.4 alone would not accomplish the AACR2 practice because all serials with a responsible body would then be named by that body + the preferred title.

LC would agree to the following changes from AACR2:

1. consider a corporate body to be a creator; and
2. not use the content of some works as the criterion for excluding the name of the responsible body when naming the work.

One result of incorporating these changes and deleting the serials exception in 6.1.1.2.4 would be a more principled approach to all resources. But, there would also be other results:

1. more works named by corporate body + title;
2. some works named by person + title (rather than corporate body + title) when the name of an official of the body appears on the source (e.g., the annual
report of a government agency named by the person who is the head of the agency + title;
(3) more successive entries for serials according to the 1.3 guidelines.

6.1.1.3.1-6.1.1.3.3: LC recommends revising this section to cover only compiler as editor. Compiler as a single creator is covered by 6.1.1.1 and multiple creators are covered by 6.1.1.2. The subhead could remain as given in the draft. Delete 6.1.1.3.1 and 6.1.1.3.2; renumber 6.1.1.3.3 as 6.1.1.3.1. See suggested wording below.

6.1.1.3.1—If the work is a compilation of works by different persons, families, or corporate bodies, construct the preferred access point representing the work by combining (in this order):
   a) the preferred access point for the compiler, formulated according to the guidelines and instructions given under 9.1.1, 10.1.1, or 11.1.1, as applicable
   b) the preferred title for the compilation, formulated according to the instructions given under 6.2.
   {examples}

   Alternative:

6.1.1.3.2—If there is more than one compiler, include in the preferred access point representing the compilation the preferred access points for all compilers commonly named when citing the compilation (in the order commonly cited), formulated according to the guidelines and instructions given under 9.1.1, 10.1.1, or 11.1.1, as applicable.
   {example}

6.1.1.3.3—If the compiler is not considered the creator of the work, construct the preferred access point representing the work using the preferred title for the compilation, formulated according to the instructions given under 6.2.
   {examples}

6.1.1.4.1: LC recommends three changes:
   (1) Change footnote 3 to just a reference to 6.17 and give it in the instruction.
   (2) Change “of the person, family, or body responsible” to “of one person, family, or corporate body responsible” because 6.1.1.4.2 covers more than one.
   (3) Add wording “unless 6.1.1.4.3 applies” to the end of the sentence.

   LC notes a typo in the 2nd example: add space to separate “parody by”

6.1.1.4.2: LC recommends changing the wording to “more than one person, family, or corporate body”
6.1.1.4.3: (1) LC recommends deleting this instruction; the reference to 6.1.1.2 in 6.1.1.4.2 covers this situation.

(2) If LC’s recommendation to delete this instruction isn’t approved, LC recommends moving the “Summer night” example to 6.1.1.6.3 because the example represents a situation of an anonymous creator.

6.1.1.5.1: (1) LC recommends changing the wording to “of one the person, family, or corporate body responsible” because 6.1.1.5.2 covers more than one.

(2) LC recommends adding a reference for legal works to see 6.23 for annotations. (Also see 6.23.1.0.3 below for a recommendation to reword 6.23.1.0.3 to refer only to annotations.)

6.1.1.5.2: LC recommends changing the wording to “more than one person, family, or corporate body.”

6.1.1.6: LC suggests reversing 6.1.1.6.1 and 6.1.1.6.2 so that the order of the instructions is in descending order of information known: probable responsibility, uncertain attribution, unknown.

6.1.1.7.1: LC recommends repeating footnote 2 from 5.3.2 here.

6.1.1.7.1, examples: (1) LC recommends deleting the two examples for “Oxford economic papers” because they are likely to be manifestations (or would be understood as manifestations) unless ch. 6 is expanded to cover manifestations as LC prefers.

(2) LC notes that many of the examples would be affected if 6.1.1.1.1 is kept as it is now in this draft.

(3) LC suggests replacing the New York State Museum and Canadian Dept. of Public Work examples with more current examples.

6.1.2.2.1: To be consistent with 6.2.6.2.2, LC recommends adding missing wording on the third line: “the preferred title or a general term (with or without a number) for the part”

6.1.2.3.2: LC notes that there is no instruction here on how to name the aggregate. (See comment above for 6.1.1.3.)

6.1.2.3.2, examples: To aid in the understanding of the examples, LC recommends adding parenthetical “Resource described” explanations.

6.1.2.3.3: LC recommends adding a term (perhaps “excerpts” or “extracts”) so that it is clear that the aggregate of parts of a work is not misidentified as the complete work.

6.1.3: (See LC’s proposed revision in 5JSC/LC/12. However, the following comment was not included in that document.) LC recommends adding wording to paragraph a) to
say not to use “other” or “unspecified” in the preferred access point because such information does not help in identifying the entity.

6.1.4: LC asks if the coverage in 6.1.4 is complete. How is the situation handled for a work named only by the preferred title when there is one or more responsible entities? As an access point? As a future link?

6.1.4.1.2: LC recommends simplifying the wording by changing it as shown below (no strike-outs or double underlining used). LC notes that “creator” might have to be changed to “creator, etc.” or “creator or originating body” depending upon the JSC decision (one aspect of the topic to be included in discussion paper LC proposes).

If the preferred access point for the work begins with the preferred access point of the creator, construct a variant access point using the preferred access point for the creator followed by the variant title for the work.

6.1.4.2.1: LC recommends simplifying the wording by changing it as shown below (no strike-outs or double underlining used); note that “provided the title of the part is distinctive” was not included because some cataloguing agencies may want to give such an access point whether it is distinctive or not. (The same comment about “creator” at 6.1.4.1.2 above applies here.)

If the preferred access point for the part of the work begins with the preferred access point of the creator, construct a variant access point using the preferred access point for the creator followed directly by the title for the part.

6.1.4.2.2: LC recommends deleting “provided the title of the part is distinctive” because some cataloguing agencies may want to give such an access point whether it is distinctive or not.

6.1.4.3.1: LC recommends a simplification to convert one long sentence into three sentences:

If the preferred access point representing a compilation of a person’s works has been constructed using the preferred access point for that person followed by a collective title (see 6.2.7), construct a variant access point representing the compilation. Use the preferred access point for the person followed by the title proper of the resource being described or the title found in a reference source if the title proper of the resource being described or the title found in a reference source is the same as, or very similar to, the collective title.

6.1.4.3.2, example: LC notes that the example is incomplete because it lacks an addition as specified in the instruction. Perhaps “(1966)” is the addition that is missing:

Dante Alighieri, 1265-1321. Tutte le opere di Dante (1966)
6.2.0.2.2: LC recommends changing the wording to “modern reference sources”

6.2.0.3.2: LC recommends changing the wording as shown below to avoid the use of term “special types.”

For instructions on choosing the preferred title for special types of works, see 6.18.0.3 (musical works), 6.24.0.3 (legal works), 6.29.0.3 (religious works), and 6.34.0.3 (official communications).

See separate instructions for choosing the preferred title for the following:
- a) musical works (see 6.18.0.3)
- b) legal works (see 6.24.0.3)
- c) religious works (see 6.29.0.3)
- d) official communications (see 6.34.0.3).

6.2.0.4.1: Because the current wording implies that 5.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording titles for works given under 5.5” to “general guidelines on capitalization, abbreviations, etc., given under 5.5”

6.2.0.4.4: LC recommends changing the wording as shown below to avoid the use of term “special types.”

For instructions on recording the preferred title for special types of works, see 6.18.0.4 (musical works), 6.24.0.4 (legal works), and 6.29.0.4 (religious works).

See separate instructions for choosing the preferred title for the following:
- a) musical works (see 6.18.0.4)
- b) legal works (see 6.24.0.4)
- c) religious works (see 6.29.0.4)

6.2.0.5: Because this section should be about the script of the preferred title and not just about transliteration, LC has the following recommendations: (1) Change the subhead to “Script of the preferred title.”

(2) Renumber the current 6.2.0.5.1 as 6.2.0.5.2.

(3) For the new 6.2.0.5.1, use LC’s recommended revision for 5.4.1 as shown below.

Record titles for works in the language and script in which they appear on the sources (see 2.2) from which they are taken or as otherwise prescribed in the applicable instructions in chapter 6 (e.g., 6.2.2.1.1, 6.2.2.2.1).

6.2.1.1.1: LC recommends adding a reference to 2.1-2.3 to clarify that the title has to be from a manifestation. How would devised titles be handled?

6.2.2.1.1: LC recommends changing wording in first sentence to “modern reference sources”
6.2.2.2 and 6.2.2.2.1: LC recommends changing “classical Greek” to “ancient Greek” to be consistent with how languages are named in ISO 639-2 (cited in instruction 6.8.0.3.1). Names of other languages will also need to be checked.

6.2.2.1, examples: Because the AACR2 rule was changed to remove preference for English, LC recommends adding parenthetical explanations that these titles are established by a cataloguing agency preferring English forms; LC also suggests that at least one of the examples be converted to the context of a cataloguing agency preferring a non-English form.

6.2.2.2: LC recommends changing “If there is no such English title” to “If there is not a title in the language preferred by the agency”

6.2.2.3: LC recommends changing “a well-established English title” to “a generally accepted title in the language preferred by the agency”

6.2.3.1, examples: LC recommends adding parenthetical explanations that these titles are established by a cataloguing agency preferring English forms.

6.2.4.1, paragraph a): LC recommends revising this paragraph as shown below to be consistent with the IME ICC principle:

a) a generally accepted title that has been assigned to the work subsequent to its creation or compilation

6.2.6.3.2: LC recommends adding a term (perhaps “excerpts” or “extracts”) so it is clear that the aggregate of parts of a work is not misidentified as the complete work.

6.2.7: LC recommends changing the subhead to “Compilations of works of a single person, family, or corporate body” so this section is not confused with 6.1.1.3. However, this wording would depend on a decision by JSC to confirm that an originating body is a creator.

6.2.7.1 -6.2.7.3: General comment: LC recommends making these sections optional. Users are not necessarily familiar with the collective titles cataloguers would use; the replacement of “Selections” in AACR2 with “Selected works” in RDA doesn’t solve any of the problems in AACR2. Cataloguing agencies should decide if the title proper of the aggregate can be used as the preferred title; for example, the LCRIs for the AACR2 collective titles rules corresponding to 6.2.7.2 and 6.2.7.3 advise catalogers to assign those collective titles only if the title is not distinctive.

6.2.7.1.2, new alternative: LC recommends adding an alternative:

Alternative:
If the person, family, or corporate body only produced works in one form, use that as the preferred title instead of Works.

6.2.7.2.1: LC recommends adding another sentence as shown below.

Record one of the following collective titles for a compilation of works (other than music, see 6.18.5) that consists of, or purports to be, the complete works of a person, family, or corporate body, in one particular form. If the person, family, or corporate body only produced works in one form, see 6.2.7.1.

6.2.7.3.2: LC recommends changing this alternative to an optional addition.

6.3.0.2.1: LC recommends that the possible sources be expanded, changing the wording to read “Take variant titles from any source.”

6.3.0.3.1: Because the current wording implies that 5.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording titles for works given under 5.5” to “general guidelines on capitalization, abbreviations, etc., given under 5.5.”

6.3.0.3.2: LC recommends deleting the footnote because a variant title is already optional.

6.3.1.1.1: LC recommends revising the wording as follows: “transliterated form different from than the form recorded”

6.3.1.3.1: LC recommends adding examples for variants that are alternative presentations of numbers or of abbreviations. LC recommended adding instructions for such variants at 5.5.2.1 and 5.5.5.1.

6.3.2.2: LC recommends changing the wording to “Take other variant titles from any source.”

6.3.2.3.1: LC recommends deleting “as required” because variant titles are optional.

6.4, footnote 5: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.1.7.1:

Form of work is one of the additions that can be used as required when needed to distinguish an access point representing the work from another access point (see 6.1.1.7).

6.5, footnote 6: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.1.7.1:

Date of work is one of the additions that can be used as required when
needed to distinguish an access point representing the work from another access point (see 6.1.1.7).

6.5.0.3: LC recommends adding here the instruction in 6.12.0.3.1 on recording dates in terms of the Christian era.

6.5.1: LC recommends changing the label from “required” to “optional” because Date of creation is only one of the subelements of Date of work.

6.5.1, footnote 8: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.1.7.1:

Date of creation is one of the additions that can be used as required when needed to distinguish an access point representing the work from another access point (see 6.1.1.7).

6.5.2: LC recommends changing the label from “required” to “optional” because Date of first publication or release is only one of the subelements of Date of work.

6.5.2, footnote 9: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.1.7.1:

Date of first publication or release is one of the additions that can be used as required when needed to distinguish an access point representing the work from another access point (see 6.1.1.7).

6.6, footnote 10: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.1.7.1:

Place of origin of the work is one of the additions that can be used as required when needed to distinguish an access point representing the work from another access point (see 6.1.1.7).

6.6.0.1.1: LC notes that “cultural area” is not covered in ch. 16 as implied by instruction in 6.6.0.3.1 to use ch. 16 for recording the place.

6.7, footnote 11: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.1.7.1:

Other distinguishing characteristic of the work is one of the additions that can be used as required when needed to distinguish an access point representing the work from another access point (see 6.1.1.7).

6.10.0.1.1: LC notes a missing word: “An identifier for the work is a number …”

◆ 6.10.0.3.1: LC recommends not requiring an identifier now. If JSC decides that an identifier should be required, LC notes that the default identifier now is the local record control number; others could be added if they are readily available.
6.10.0.3.1: LC recommends changing the word in the second example to “Qur’ān” rather than using the conventional form “Koran.” In response to requests from U.S. libraries and others, LC will be changing its policy and updating its database to use “Qur’ān” later this year.

6.11: LC notes this information now is conveyed in the Leader in a bibliographic record for a manifestation. Does anyone have a suggestion for a better way to handle this attribute for an expression?

6.11.0.1.1: LC suggests giving the second sentence as a separate paragraph.

6.11.0.3.2: LC recommends revising the wording as follows: “… more than one content type, of record only…”

6.11.0.3.3 and 6.11.0.3.4: LC recommends that wording be added to clarify that the words “other” and “unspecified” would not be included in access points.

6.12, footnote 13: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.3:

Date of expression is one of the additions that can be used as required when needed to distinguish an access point representing an expression of a work from an access point for a different expression of the work (see 6.1.3).

6.12.0.3.1: Instead of the instruction to use the Gregorian calendar, LC recommends repeating here the instruction in 6.5.0.3.1 to use the calendar preferred by the agency creating the data.

6.13, footnote 15: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.3:

Language of expression is one of the additions that can be used as required when needed to distinguish an access point representing an expression of a work from an access point for a different expression of the work (see 6.1.3).

6.13.0.5.1: LC recommends revising the wording as shown below to put the “e.g.” statement in the appropriate position.

If the language of the expression being identified (e.g., a translation, a dubbed motion picture) is different from that of the original (e.g., a translation, a dubbed motion picture), record the name of the language of the expression.

6.13.0.5.2: Although LC agreed in the response to the editor’s draft to keep the AACR2 practice for subtitles in the first release of RDA, LC now suggests making the following change because the addition of subtitles does create a new expression: revise the wording
of 6.13.0.5.2 as shown below and add the AACR2 rule (6.13.0.5.2 as in the draft) as an alternative.

If a motion picture has subtitles, record the name of the language of the subtitles.

Alternative:
Do not record the name of the language for a motion picture with subtitles.

6.13.0.6.1: Although LC responded to the editor’s draft by suggesting the replacement wording “create access points for each of the language expressions” used in the current draft, LC recommends revising the instruction as shown below; LC realizes the instruction here is about recording the language of the expressions (not about access points).

If the resource described contains two or more language expressions of a work, expressions of the work in two or more languages, record the language of each expression, create access points for each of the language expressions.

6.14, footnote 16: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.3:

Version is one of the additions that can be used as required when needed to distinguish an access point representing an expression of a work from an access point for a different expression of the work (see 6.1.3).

6.15, footnote, 17: LC recommends revising the footnote to acknowledge the flexibility given in 6.1.3:

Technique is one of the additions that can be used as required when needed to distinguish an access point representing an expression of a work from an access point for a different expression of the work (see 6.1.3).

6.16.0.1.1: LC notes a word is missing: “An identifier for the expression is a number ...

6.17-6.22: For LC’s comments on these instructions, see 5JSC/LC/12.

6.23.1.0.1, paragraph a): Per LC’s comment for 6.1.1.5, LC recommends changing the wording to “a) laws, etc., and annotated editions of laws, etc. (see 6.23.1.1.-6.23.1.5).

LC lists the following annotated laws as possibilities for examples:

France. Code de la propriété intellectuelle : code annoté / sous la direction d’Yves Marcellin. (2001383230)
Canada. The annotated Indian Act, including related treaties, statutes, and regulations. (95642000)
6.23.1.0.3: Per LC’s comment for 6.1.1.5, LC recommends changing the wording to “For annotated editions of laws and commentaries, see 6.1.1.5.”

6.23.1.1.1: LC recommends the addition of examples that show the use of collective title “Laws.” Some compilations that could be used to create examples: United States Code; Revised statutes of Canada, 1985; Current law statutes annotated [of either Great Britain or Scotland]; Acts of the Parliament of the Commonwealth of Australia.

6.23.1.7.1: LC’s Law Library, due to its close relationship with Congressional users interested mainly in the law(s), recommends adding an alternative always to use the preferred access point for the law(s). LC acknowledges that naming the work this way does not follow the principle of representation.

Alternative:
If a law or laws and regulations, etc., derived from the law(s) are issued together, always use the preferred access point appropriate to the law(s).

6.23.1.15: LC recommends deleting the wording “international” in the subhead and in the wording of instructions because there are intergovernmental bodies at the national level and below.

6.23.1.20a.2: LC recommends revising this instruction because 6.23.1.20a lacks an “in case of doubt” clause:

If the reports are not issued by or under the authority of the court or this information cannot be determined readily, use the title as the preferred access point.

6.23.1.20b.5: LC recommends revising this instruction because 6.23.1.20b lacks an “in case of doubt” clause:

If the reports are not issued by or under the authority of the court or this information cannot be determined readily, construct the preferred access point by combining (in this order):

6.23.2.0.3: LC recommends “raising” this instruction to 6.23.2.1 to be parallel to the current 6.23.2.1 (the latter to be renumbered as 6.23.2.2).

◆ 6.24: LC recommends retaining the AACR2 collective uniform titles (including the Latin abbreviation) “Laws, etc.,” “Treaties, etc.,” and “Protocols, etc.” in the first release of RDA.

6.24.0.4.1: Because the current wording implies that 5.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording titles for works given under 5.5” to “general guidelines on capitalization, abbreviations, etc., given under 5.5.”
6.25.0.3.2, footnote 27: LC recommends deleting the footnote because a variant title is already optional.

6.26.0.3.1: LC recommends including here the instruction about B.C. and A.D. dates in 6.12.0.3.1.

6.26.1: LC recommends changing the label from “required” to “optional” because Date of promulgation … is only one of the subelements of Date of work and is required only when needed to differentiate two works.

6.26.1, footnote 30: LC recommends revising the footnote to clarify that the subelement is required only when differentiating two works (the condition specified in 6.23.1.31):

Date of promulgation of a law, etc., is required as an addition when needed to distinguish an access point for one work from an access point for a different work specified as an addition to an access point representing the work (see 6.23.1.31).

6.26.2: LC recommends changing the label from “required” to “optional” because Date of signing … is only one of the subelements of Date of work.

6.28.1.1.2, paragraph a): LC notes an incorrect reference: change “11.1.1” to “9.1.1”

◆ 6.28.1.3: LC recommends not retaining the distinction. See also the comment for 6.28.1.3.2 below.

6.28.1.3.2: LC supports the ATLA position to name the work by using the preferred title. LC notes that the example in the draft does not match the instruction because the body’s preferred access point is lacking.

6.28.1.4.3: LC notes an incorrect number: change “6.28.1.1” to “6.28.2.2”

6.28.1.4.4, paragraph b): LC recommends deleting “for congregations and choirs” because the audience for the resource shouldn’t be part of the instruction.

6.28.2.3.1: LC notes an incorrect number: change “6.28.1.4” to “6.28.1.6”

6.28.3.1, paragraph a): Because this instruction should also cover a single expression is more than one language, LC recommends revising paragraph a) to “a term indicating the language(s) of the expression (see 6.13).”

6.28.3.1.2: LC notes that an instruction on how to name the aggregate work is needed so that it can be named when needed as a subject access point or as a related work. Possibilities would be to devise a collective title or to use the title proper.
**6.28.3.4.3**: LC recommends deleting the 3rd and 4th examples; they’re the same as examples in 6.29.5.2.1 and belong at that instruction.

**6.28.5**: LC recommends changing the name of the element to “Variant access point representing a religious work”

**6.29.4.4, footnote 34**: LC recommends giving the sources in the instruction as in 6.29.6. Instead of the mixture of sources (many not current), LC recommends referring only to *New Catholic Encyclopedia*.

**6.29.7.4, footnote 35**: LC recommends deleting the footnote and giving this information in the instruction.

**6.29.7.7**: LC recommends adding a term (perhaps “excerpts” or “extracts”) so that it is clear that the aggregate of parts of a work is not misidentified as the complete work.

**6.29.16**: LC recommends changing the transliterated form to “Qur’ān” following the table rather than using the conventional form “Koran.” Also see the comment at 6.10.0.3.1.

**6.30.0.3.2, footnote 36**: LC recommends deleting the footnote because a variant title is already optional.

**6.30.1.1.1**: LC recommends revising the wording as follows: “transliterated form different from than the form recorded”

**6.31, footnote 37**: LC recommends revising the footnote to acknowledge the flexibility given in the instructions cited in the footnote:

> Version is required when needed to distinguish an expression of the Vedas from another expression of the Vedas (see 6.28.3.3). Version is one of the additions that can be used as needed when specified as an addition to distinguish an access point representing an expression of the Bible from another expression of the Bible (see 6.28.3.1), an expression of the Vedas (see 6.28.3.3), or an expression of a liturgical work from another expression of the same work (see 6.28.3.4).

**6.31.0.4.1, footnote 38**: LC recommends changing this footnote to an instruction (would also recommend deleting “and references”).

**6.31.0.4.4, paragraph b), footnote 39**: LC recommends changing this footnote to an instruction.
6.32, footnote 40: LC recommends revising the footnote to acknowledge the flexibility given in 6.28.3.1:

Date of expression is one of the three elements that can be used as needed required when specified as an addition to an access point to distinguish an access point representing an expression of the Bible from a different expression of the Bible (see 6.28.3.1).

6.35.0.3.2, footnote 41: LC recommends deleting the footnote because a variant title is already optional.

6.35.1.1.1: LC recommends revising the wording as follows: “transliterated form different from than the form recorded”

CHAPTER 8

8.0: LC recommends adding a new instruction as 8.0.4 to refer users to the appropriate chapters in section 3.

8.1.3: The terms here are defined differently in other chapters. How will the differences here be reconciled with single definitions in the glossary?

8.2: General comment: Because the General Introduction has sections on objectives and principles, LC recommends just referring here to the introduction instead of repeating/wording the objectives and principles here. Otherwise, the user discovers a restricted scope for the objectives and principles depending upon the chapter consulted.

8.3: General comment on style: The use of italicized captions for listing of elements is confusing because they appear to be themselves additions and because some captions are the same as the element to be used. LC recommends deleting those italicized captions and listing just the elements.

8.3.1: LC recommends giving the “preferred access point for the person,” “preferred access point for the family,” and “preferred access point for the corporate body” and deleting 8.3.2.

8.4: LC recommends changing the subhead to read “Language and script of the name”

8.4.1: LC recommends revising the instruction as shown below for two reasons: (1) add a reference to ch. 2 to make the connection to the resources for people who in the Web tool go directly to chapter 8; and

(2) add a clarification at the end of the sentence because many instructions in chapter 6 contradict 8.4.1:

Record titles for works in the language and script in which they appear on
the sources (see 2.2) from which they are taken or as otherwise prescribed in the applicable instructions in chapter 6 (e.g., 6.2.2.1.1, 6.2.2.2.1).

8.4.2: LC recommends clarifying the use of the transliterated form of the name by revising the wording as shown below:

Record a transliterated form of the name either as a substitute for, or as a variant access point in addition to, the form that appears on the source.

8.5.0.1: LC recommends revising this instruction to refer to the possibility of using a local style manual or capturing already-existing data, etc. (as noted in ch. 1).

8.5.1.1b.1: LC recommends a simplification: delete “such as names … letter or letters”

8.5.2.1: LC recommends adding wording at the end of the sentence to coincide with LC’s recommendations for 11.3.3.2 and 11.3.3.3 to add instructions about giving variant access points:

When recording a title for a work, record numbers expressed as numerals or as words in the form in which they appear on the source of information or as otherwise prescribed in the applicable instructions in chapters 9-11 (e.g., 11.7.0.7).

8.5.3.1: LC recommends adding an instruction for other forms as variants because forms with or without diacritics may be indexed directly in some systems.

8.5.3.2: LC recommends deleting this instruction because it is essentially the same as the second sentence in 8.5.3.1.

8.5.4.1: LC recommends the following rewording (similar to what is in 8.5.3.1):

Record hyphens appearing between given names if they appear in the source of information. Retain hyphens between given names if they are used by the bearer of the name.

8.5.6.1: LC recommends revising the wording as shown below; a further simplification is also given:

a) record an abbreviation forming an integral part of the name (e.g., St. (Saint)) in an abbreviated form if the abbreviation appears in the name of the person, family, or corporate body in the source of information.

8.7.2: LC recommends revising the wording to add the concept of differentiating a variant access point from a preferred access point:

Make additions to the name, if considered important for identification or to distinguish a variant access point from a preferred access point, following
the instructions ...

◆ 8.10.0.3.1: See LC’s comments for 5.8.0.3.1.

8.11.0.1.1: The term “name” in the name of the element should be in bold type. LC recommends revising the wording as follows: “… is a term or code indicating …”

8.11.0.3.1: LC recommends revising the wording as follows: “… by the same name, record the term undifferentiated or the equivalent code.

8.12.0.1.1: LC recommends generalizing the wording to cover communications with persons (e.g., authors, composers, employee of corporate body, family member) as sources. Perhaps “Sources consulted are publications, reference sources, individuals, etc., used in establishing …”

8.12.0.3.1: Should there be an explanation of style and punctuation (it is essentially what appears in MARC 21 documentation for the 670 field)? Also, wording of 5.9.0.3.1 doesn’t specify giving the location of the information found although most of the examples do so.

8.12.0.3.3: LC recommends either making the equivalent of the MARC 21 675 field (“source not found”) be an element or revising this instruction to say to include the indication “no information found.”

8.13: LC notes that this chapter lacks an instruction for making annotations for the end user. Some of the examples in 8.13.0.3.1 would be helpful public notes (e.g., “Not the same as …” and “Not to be confused with …”)

CHAPTER 9

General comment for ch. 9: LC recommends using “given name” as the only term throughout chapter 9 instead of switching from “given name” to “forename” as AACR2 did.

9.0.2.1, footnote 2: LC notes a typo: change “includes” to “include”

9.0.2.2: LC recommends that the instruction be reworded as below because the scope of possible sources should be the same for both preferred name (9.0.2.1) and variant names.

Take variant names from any source resources associated with the person and/or from reference sources.

9.1.1.1.2: Because “in the order listed” results in the use of a “period of activity” date (no longer restricted to non-contemporaries) before the use of a fuller form of name to distinguish an access point, LC recommends giving the possible additions in a list with a
specific change to move “period of activity” after a fuller form of name. Suggested wording is given below (no strike-outs or double underlining used):

If the access point for the person is identical or similar to an access point representing a different person, add, in the order listed:
   a) a title or other designation associated with the person (9.1.1.2)
   b) a date of birth or a date of death (9.1.1.3; 9.4.1-9.4.2)
   c) a fuller form of name (9.1.1.4)
   d) a period of activity (9.4.3).

**Between 9.1.1.2 and 9.1.1.3:** LC recommends including the context (breaking a conflict) in this instruction to clarify why such additions are made. An instruction comparable to 6.1.7.1 is lacking in this chapter. Suggested wording:

Make additions to the name as instructed under 9.1.1.2-9.1.1.4, as applicable, needed to distinguish between access points for different persons, in the order listed.

**9.1.1.3:** LC suggests the following revision for simplification:

If no suitable addition is available, use the same access point for all persons with the same name, and indicate use an undifferentiated name indicator (see 8.11) that the access point is an undifferentiated name to designate the name as one that is undifferentiated.

**9.1.1.3, first example:** LC recommends deleting the comma after “Geschichte” to represent European punctuation style.

**9.1.1.3.1:** LC notes the use of terms “born” and “died” in the examples and asks if JSC has made the decision to display the elements with terms. LC suggests a hyphen after a date of birth and before a date of death to replicate the AACR2 punctuation conventions.

**9.1.1.3.2:** LC recommends revising the wording as shown below to explain why such an addition may be made.

*Optional addition.* Add a date or dates associated with the person *if the addition assists in the understanding of the identity of the person* even if there is no need to distinguish between access points.

**9.1.1.4.2:** LC recommends revising the wording as shown below to explain why such an addition may be made.

*Optional addition.* Add a fuller form of name *if the addition assists in the understanding of the identity of the person* even if there is no need to distinguish between access points.

**9.2.0.2:** LC notes that the first paragraph’s number should be 9.2.0.2.1.

**9.2.0.2, new alternative:** LC recommends adding an alternative to accommodate the
principle in 8.2.4 of a generally-accepted form in the language and script preferred by the agency creating the data. Suggested wording is given below.

Alternative: Determine the preferred form of name for a person by selecting a generally-accepted form of name in the language and script preferred by the agency creating the data.

9.2.0.4.2, footnote 3: For purposes of internationalization, LC recommends deleting the footnote (Icelandic telephone directories are considered authoritative) and allowing catalogers to decide what is authoritative.

9.2.1.2: LC repeats the recommendation it made on the editor’s draft to use “original or adopted language.” The term “native” could have the same negative reactions caused by the term “vernacular” JSC is replacing. The IME ICC draft statement uses “original language.”

9.2.1.2a: LC notes that the approved language names from the ISO standard are Ancient Greek and Modern Greek.

9.2.1.2b: LC recommends this revision of the subhead (to be clear about the scope and to be consistent with the subhead for 9.2.1.3a): “Established form of a given name in the language preferred by the agency creating the data.”

9.2.1.3b, footnote 6: LC recommends that this footnote be given in the style of other alternatives in RDA.

9.2.1.3b.4: LC recommends the revised wording below because this instruction should apply to more than just persons who are creators.

If a name is written in more than one non-preferred script, transliterate it according to the table for the original language of most of the resources.

9.2.4.1: To accommodate joint pseudonyms, LC recommends revising the first sentence as shown below:

If an individual has more than one identity or has joined with one or more other individuals to use a joint pseudonym, choose the name associated with each identity as the preferred name for that identity.

9.2.4.2: LC recommends deleting “as a creator or contributor” because the exception should not be based on the role of the person.

9.2.5.1.2: Because the current wording implies that 8.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording names given under 8.5” to “general guidelines on capitalization, abbreviations, etc., given under 8.5.”
9.2.5.1.3: This instruction is an example of punctuation being specified. But the style of such guidelines in various instructions is not consistent. Here it is worded as punctuation following a part of a name. In other instructions (e.g., 9.2.5.6.2, 9.2.10.1.3, 9.2.14.1.3), the guideline is worded as punctuation preceding a part of a name or access point. Is it possible to have a consistent style of wording?

9.2.5.3: LC recommends adding an instruction about giving a variant access point for the name in direct order (as in 9.2.5.4.2).

9.2.5.6.2: LC recommends adding wording for and an example with a roman numeral.

9.2.5.7: LC recommends expanding the subhead to avoid the misunderstanding that this one instruction addresses all situations: “Saints whose name contains a surname”

9.2.6.1.1: LC recommends adding wording “The parts of the names may or may not be hyphenated”; also see comment for 9.2.6.3.

9.2.6.1.3: LC recommends the following rewording to clarify the meaning (the same suggestion is made for other instructions when the sentence is longer than one line; there isn’t a problem with the meaning when “as variant names,” etc., appears at the end of a short sentence):

Record as variant names forms of the name using other parts of the compound surname as the first element as variant names (see 9.3.7).

9.2.6.2: LC recommends adding here as exceptions the content of 9.2.6.4 and 9.2.6.5.2.

9.2.6.2.1, footnote 7: LC recommends giving this footnote as an instruction and rewording it as below to clarify the meaning:

Take regular or occasional initializing of a part of a name appears in preceding a surname as an indication that that part is not used as part of the surname. If a part of a possible compound surname is regularly or occasionally initialized, do not consider it to be part of the surname.

9.2.6.3: LC recommends deleting this instruction because it repeats the general instruction in 9.2.6.1.1. Also see the comment for 9.2.6.1.1.

9.2.6.4: LC recommends moving this content to 9.2.6.2 and giving it there as an exception. (In the current 9.2.6.4.1, the wording “For hyphenated names, follow the instructions given under 9.2.6.3.” would need to be deleted.)

9.2.6.5.1: LC recommends deleting this instruction because it repeats the general instruction in 9.2.6.1.1.
9.2.6.5.2: LC recommends moving this content to 9.2.6.2 and giving it there as an exception.

9.2.6.6: LC recommends condensing paragraphs a) and b) into one exception. Because variant names are optional, the condition in 9.2.6.6a.2 does not need to be given specifically for English.

9.2.6.7: LC recommends deleting this instruction because it is covered by LC’s recommendation for changing the instruction at 9.2.6.1.1.

9.2.7.2.3: LC recommends the revised wording below (1) to extend the scope beyond creators (the change at the end of the first sentence) and (2) to make the order of the actions easier to identify.

If a person has used two or more languages, record the name following the instructions for the language of most of that person’s works or the resources associated with that person. Otherwise, record the name according to the following preferred order:
   a) In case of doubt, follow the instructions for the language preferred by the agency creating the data if that is one of the languages. Otherwise, b) If the person is known to have changed his or her country of residence, follow the instructions for the language of the adopted country. As a last resort, c) Follow the instructions for the language of the name.

9.2.7.3.2: LC recommends revising the wording to “Record as a variant name a form of name using the part(s) of the name …”

9.2.8.3: LC recommends revising the wording to “Record as a variant name a form of name using the part(s) of the name …”

9.2.9.1: LC recommends revising the wording on the third line to “… renounced its his or her throne …”

9.2.9.2: LC recommends making the second sentence (i.e., “If there is no surname …”) be a separate instruction.

9.2.10.1.2: LC recommends revising the wording of the a) and b) paragraphs as shown below:

   a) uses his or her title of nobility rather than surname in his or her works or resources associated with that person
   or b) is listed under his or her title of nobility in reference sources.

9.2.10.1.2, footnote 9: LC recommends revising the wording to “… all under title of nobility or all under surname” and moving this footnote to 9.0.2.
9.2.10.1.3:  (1) LC recommends revising the wording to “Follow the proper name in the title of nobility by …”

   (2) This instruction is another example of punctuation being specified. But the style of such guidelines in various instructions is not consistent. Here it is worded as punctuation preceding a part of a name. In other instructions (e.g., 9.2.5.1.3), the guideline is worded as punctuation following a part of a name or access point. Is it possible to have a consistent style of wording?

   (3) The last example is confusing because it lacks the explanation that this person doesn’t use the title of nobility; include the title of nobility in the explanation.

9.2.10.1.4: LC recommends renumbering this instruction and giving it its own subhead “Saints known by title of nobility” because other instructions related to saints (e.g., 9.2.7) have that status in the structure of the chapter.

9.2.10.1.5: LC recommends renumbering this instruction as 9.2.10.1.4 and rewording it as shown below:

   Record as a variant name a form of name using the surname as the first element as a variant name (see 9.3.7), unless the proper name in the title of nobility is the same as the surname.

9.2.11: LC recommends adding an instruction about giving a variant name:

   Record as a variant name a form of name including a territorial designation if that designation does not appear in the preferred name.

9.2.12: LC recommends adding an explanation of the term “law title.”

9.2.14 (and preceding unnumbered wording): LC recommends changing the wording to use the term “Given names” (more recognizable concept from AACR2).

9.2.14.1.5: LC recommends renumbering this instruction and giving it its own subhead “Saints known by title of nobility” because other instructions related to saints (e.g., 9.2.7) have that status in the structure of the chapter.

9.2.15.2:  (1) LC notes that the second sentence lacks an instruction on punctuation.

   (2) LC recommends deleting the Moses ben Jacob example because it is a combination of this instruction and that on place.

9.2.15.4: LC recommends revising the wording as below:

   Record as a variant name a form of name using the patronymic as the first element as a variant name (see 9.3.7).
**9.2.17:** In this subhead, in the wording preceding 9.2.17, and in the wording throughout 9.2.17, LC recommends deleting “or” preceding “separate letters” in the phrase “… consisting of initials, or separate letters, or numerals”

**9.2.17.1.2:** Following the principles of representation, LC recommends revising the instruction to retain such typographic devices when they follow single-letter initials. The second sentence could be reworded as below:

Include any typographic devices when they appear as part of a name multi-letter abbreviations of a name, but omit them when they follow single-letter initials.

**9.2.17.1.2, examples:** (1) If JSC accepts the change proposed by LC for this instruction, the second example would need to be revised to show the asterisks.

(2) LC recommends deleting “H., abbé” and “D.S., Master” because they are problematic given the result for “Dr. X” in 9.2.18.1.2.

**9.2.18.1.1:** (1) LC notes that it is at this point in the chapter that the term “forename” is used instead of “given name.” See the general comment for ch. 9 above.

(2) Because the current wording implies that 8.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording names given under 8.5” to “general guidelines on capitalization, abbreviations, etc., given under 8.5.”

**9.2.18.1.3:** LC recommends changing the wording to “Record as a variant name a form of name using …”

**9.2.19.1:** Because the current wording implies that 8.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording names given under 8.5” to “general guidelines on capitalization, abbreviations, etc., given under 8.5.”

**9.2.20:** LC recommends adding an instruction for giving a variant name:

Record as a variant name a form of name giving the second part of the phrase as the first element (see 9.3.7).

**9.2.20.1:** Because the current wording implies that 8.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording names given under 8.5” to “general guidelines on capitalization, abbreviations, etc., given under 8.5.”

**9.2.21.1:** Because the current wording implies that 8.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording names given under 8.5” to “general guidelines on capitalization, abbreviations, etc., given under 8.5.”
9.2.21.3: LC recommends revising the wording as below to simplify the wording and to remove the requirement that the word/phrase had to appear on resources:

If the person is commonly identified by a real name or another name (see 9.2.2), and a word or phrase characterizing that person has appeared in resources associated with the person, record the characterizing word or phrase as a variant name (see 9.3.7).

9.2.22.1: Because the current wording implies that 8.5 will give all the general guidelines, LC recommends clarifying the wording by changing “general guidelines on recording names given under 8.5” to “general guidelines on capitalization, abbreviations, etc., given under 8.5.”

9.2.22.3: LC recommends changing “Record as a variant name a form of name using the title of the other work as the …”

9.2.22.4: LC recommends revising the wording as below to simplify the wording and to remove the requirement that the word/phrase must appear on resources:

If the person is commonly identified by a real name or another name (see 9.2.2), and a phrase including the title of another work has appeared in resources associated with the person, record the word or phrase naming the work as a variant name (see 9.3.7).

9.3.0: LC assumes it is at this point in the chapter that the context applies only to authority data not recorded in a bibliographic record. Is that correct? If so, it would be helpful to have explicit information here saying that. It will definitely be a training issue.

9.3.0.2.1: LC recommends changing the wording to “Take real names from any source.”

9.3.0.3.4: LC recommends adding a comma after “element” on the second line.

9.3.0.3.5: LC asks how “preceding sections” will be handled in the Web tool. Should specific sections be listed?

9.3.1.2.1: LC recommends changing the wording to “Take secular names from any source.”

9.3.1.3.1: LC recommends deleting “as a creator or contributor” to allow for other roles.

9.3.3.2.1: LC recommends changing the wording to “Take names in religion from any source.”

9.3.4.2.1: LC recommends changing the wording to “Take earlier names from any source.”
9.3.4.3.1: LC recommends deleting “a” in “... earlier names as a variant names.”

9.3.5.2.1: LC recommends changing the wording to “Take later names from any source.”

9.3.5.3.1: LC recommends deleting “a” in “... later names as a variant names.”

9.3.6.1.1: LC recommends revising the wording as follows: “transliterated form different from than the form recorded”

9.3.6.2.1: LC recommends changing the wording to “Take alternative linguistic forms from any source.”

9.3.6.3.1: LC asks why the different forms are grouped together instead of being handled as separate relationships as in 9.3.1, 9.3.2, and 9.3.3.

9.3.7.2.1: LC recommends changing the wording to “Take other variant names from any source.”

9.3.7.3: LC asks why the different forms are grouped together instead of being handled as separate relationships.

9.3.7.3.1, examples: LC notes that capitalization for names involving prefixes is not consistent. Lowercase the prefix in Fontaine, Witt, and Meer examples on p. 9-48 and in the Barry example on p. 9-49.

9.4, footnote 10: LC recommends revising the footnote to acknowledge the flexibility allowed for breaking a conflict (see also LC’s recommendation for revision of 9.1.1.1.2:

A date associated with the person is one of the additions that can be used as required when needed to distinguish an access point representing the person from another access point (see 9.1.1.1.2 9.1.1.3).

9.4.0.3: LC recommends adding here the instruction in 6.12.0.3.1 on recording dates in terms of the Christian era. (An example in 9.4.1.3.1 uses “B.C.” and that instruction refers back to 9.4.0.)

9.4.1: LC recommends changing the label from “required” to “optional” because Date of birth is only one of the subelements of Date associated with the person.

9.4.1, footnote 12: LC recommends revising the footnote to acknowledge the flexibility given in LC’s proposed 9.1.1.1.2:

Date of birth is one of the additions that can be used as required when needed to distinguish an access point representing the work from another access point (see 9.1.1.1.2 9.1.1.3).
9.4.1.3.2: LC asks if this form of date is based on ISO 8601? If so, should that standard be referenced as is done for names of languages in 6.13.0.3.1?

9.4.1.3.3: (1) LC recommends changing the term to “date of birth not identified” to be consistent with style of missing information specified in ch. 2 (e.g., “Date of production not identified”). LC notes that the term in draft now (i.e., “unknown”) is not the same as for date of death (i.e., “not known” in 9.4.2.3.2).

(2) LC recommends clarifying that the term would not be included in an access point for a person.

9.4.2: LC recommends changing the label from “required” to “optional” because Date of death is only one of the subelements of Date associated with the person.

9.4.2, footnote 13: LC recommends revising the footnote to acknowledge the flexibility given in LC’s proposed 9.1.1.1.2:

Date of death is one of the additions that can be used as required when needed to distinguish an access point representing the person from another access point (see 9.1.1.2 9.1.1.3).

9.4.2.3.2: (1) LC recommends changing the term to “date of death not identified” to be consistent with style of missing information specified in ch. 2 (e.g., “Date of production not identified”).

(2) LC recommends clarifying that the term would not be included in an access point for a person.

9.4.3: LC recommends changing the label from “required” to “optional” because Period of activity is only one of the subelements of Date associated with the person.

9.4.3, footnote 14: LC recommends revising the footnote to acknowledge the flexibility given in LC’s proposed 9.1.1.1.2 and to clarify that Period of activity is given only if the date of birth and date of death are unknown:

Period of activity is one of the additions that can be used as required when needed to distinguish an access point representing the person from another access point (see 9.1.1.2 9.1.1.3). It is used when Date of birth, Date of death, and Fuller form of name are unknown or when the option at 9.1.1.3.2 is applied.

9.5: LC recommends changing the subhead to “Royal, noble, law, or religious title of the person” and making the same changes in this section (9.5.0 subhead, 9.5.0.1.1, etc.)

9.5, missing footnote for element label: LC recommends adding a footnote to acknowledge the flexibility given in LC’s proposed 9.1.1.1.2:

Royal, noble, law, or religious title of the person is one of the additions that
can be used as needed to distinguish an access point representing the person from another access point (see 9.1.1.2).

9.5.0.1.1: LC notes there are problems with the font size on second and third lines.

9.5.0.4: LC asks why this numbering is not 9.5.1, etc.

9.5.0.4a.1: LC recommends adding another sentence to address what to do if there aren’t satisfactory equivalents in the language of the agency: “Otherwise, use the form found on the resource.”

9.5.0.4b.1: LC recommends revising the wording as below for simplification because 9.5.0.4a.1 already says to prefer the language of the agency:

For a consort of a person with the highest royal status within a state or people, record his or her title followed by the term consort of followed by [the preferred name for the royal person and his or her title as prescribed in 9.5.0.4a]. Record the title of the consort in the language preferred by the agency creating the data if there is a satisfactory equivalent in that language.

9.5.0.4c.1: LC recommends adding another sentence to address what to do if there aren’t satisfactory equivalents in the language of the agency: “Otherwise, use the form found on the resource.”

9.5.0.4d.1: LC recommends adding another sentence to address what to do if there aren’t satisfactory equivalents in the language of the agency: “Otherwise, use the form found on the resource.”

9.5.0.5.1, footnote 16: LC recommends giving this footnote as the first sentence in 9.5.0.5.1.

9.5.0.5.1, footnote 17: LC recommends deleting the footnote and revising the wording at the end of the first sentence: “… or in reference sources not dealing with the nobility.”

9.5.0.8.1: At the end of the third line, LC recommends changing the wording to “… record the religious title …”

9.5.0.9: LC recommends adding an instruction for law title of the Scottish Court as a counterpart to 9.2.12.

9.6, footnote 18: LC recommends revising the footnote to acknowledge the flexibility allowed for breaking a conflict (see also LC’s recommendation for revision of 9.1.1.1.2:

A fuller form of name is one of the additions that can be used as required when needed to distinguish an access point representing the person from another access point (see 9.1.1.2 9.1.1.4). It is used when Date of birth
or Date of death is unknown or when the option at 9.1.1.4.2 is being applied.

9.6.0.1.1: LC recommends changing the wording on the second line to cover abbreviations or other shortened forms (e.g., “Wm.” or “Chr.”): “… only by an initial, abbreviation, etc., in the form …”

9.6.0.3.1: LC recommends simplifying the wording of this instruction as shown below. If a fuller form of a person’s name is known and if the preferred name as prescribed by the instructions given under 9.2 does not include all of that the known fuller form(s), record, as appropriate:¹⁹

a) the fuller form of all the inverted part of the name (forenames, etc.)

and/or b) the fuller form of the part of the name recorded as the first element of the name (surname, etc.).

9.6.0.3.2: LC recommends deleting “when appropriate” because the element is optional if not needed to break a conflict.

9.7, missing footnote for element label: LC recommends adding a footnote to acknowledge the flexibility given in LC’s proposed 9.1.1.1.2:

Other designation associated with the person is one of the additions that can be used as needed to distinguish an access point representing the person from another access point (see 9.1.1.1.2).

9.7.0.4.1: LC recommends deleting “Christian” because the individual instructions (9.2.5.7.1, 9.2.10.1.4, and 9.2.14.1.5) are not restricted to Christian saints.

◆ 9.8.0.3: LC agrees with the terms given in the closed list.

9.12-9.17: LC recommends adding an instruction about giving the time span if the information changes over time.

◆ 9.19: LC recommends not requiring an identifier now. If JSC decides that an identifier should be required, LC notes that the default identifier now is the local record control number; others could be added if they are readily available.

9.19.0.3.2: LC recommends giving the second sentence as a separate instruction because it could also be applied to an identifier for which there is a prescribed format (9.19.0.3.1).

CHAPTER 10

10.0.2.3: LC recommends changing the wording to “Take variant names from any source.”
**10.1.1.2:** LC recommends naming the possible additions here instead of just citing the instructions and to clarify that the first is always required. Suggested wording is below:

Make additions to the name as instructed under 10.1.1.2-10.1.1.5, as applicable, in the order listed:

a) type of family (see 10.1.1.2)

b) date associated with the family, as applicable (see 10.1.1.3)

c) place associated with the family, as applicable (see 10.1.1.4)

d) prominent member of the family, as applicable (see 10.1.1.5).

**10.1.1.3:** LC suggests the following revision for simplification:

If no suitable addition is available, use the same access point for all families with the same name, and indicate use an undifferentiated name indicator (see 8.11) that the access point is an undifferentiated name to designate the name as one that is undifferentiated.

**10.1.1.3-10.1.1.5:** LC recommends including an optional addition for each based on wording in 11.1.1.3.2:

Optional addition. Add a __________ if the addition assists in the understanding of the identity of the family even if there is no need to distinguish between access points.

**10.2.0.2, new alternative:** LC recommends adding an alternative to accommodate the principle in 8.2.4 of a generally-accepted form in the language and script preferred by the agency creating the data. Suggested wording is given below.

Alternative: Determine the preferred form of name for a family by selecting a generally-accepted form of name in the language and script preferred by the agency creating the data.

**10.2.0.4.2, footnote 4:** For purposes of internationalization, LC recommends deleting the footnote (Icelandic telephone directories are considered authoritative) and allowing catalogers to decide what is authoritative.

**10.3.0.2.1:** LC recommends changing the wording to “Take variant names from any source.”

**10.3.0.3.4:** Because variant names are optional, LC recommends changing the wording as shown below.

Record as a variant name a form of name using a different part of the name as the first element if the name might reasonably be sought under that part.

**10.3.1.1:** LC recommends revising the wording as follows: “transliterated form different from the form recorded”
10.3.1.2.1: LC recommends changing the wording to “Take alternative linguistic forms of names from any source.”

10.3.2.2.1: LC recommends changing the wording to “Take other variant names from any source.”

◆ 10.4.0.3: LC recommends adding another instruction as 10.4.0.3.2 based on wording used in other parts of RDA where there is a suggested list of terms:

If none of the terms listed above is appropriate, use a term designating the type of family as concisely as possible.

10.5, footnote 5: LC recommends revising the footnote to acknowledge the flexibility allowed for breaking a conflict (see also LC’s recommendation for revision of 10.1.1.1.2):

A date associated with the family is one of the additions that can be used as required when needed to distinguish an access point representing the family from another access point (see 10.1.1.2 10.1.1.3).

10.6, footnote 6: LC recommends revising the footnote to acknowledge the flexibility allowed for breaking a conflict (see also LC’s recommendation for revision of 10.1.1.1.2 and for the optional additions at 10.1.1.3-10.1.1.5):

A place associated with the family is one of the additions that can be used as required when needed to distinguish an access point representing the family from another access point (see 10.1.1.2 10.1.1.3). It is used when a date associated with the family is unknown or when the option at 10.1.1.4 is being applied.

10.6.0.3: (1) LC asks if it is the preferred access point form of the place that is given here. If so, should there be a reference to chapter 16?

(2) LC recommends adding an instruction about giving the time span if the information changes over time.

10.7, footnote 7: LC recommends revising the footnote to acknowledge the flexibility allowed for breaking a conflict (see also LC’s recommendation for revision of 10.1.1.1.2 and for the optional additions at 10.1.1.3-10.1.1.5):

A prominent member of the family is one of the additions that can be used as required when needed to distinguish an access point representing the family from another access point (see 10.1.1.1.2 10.1.1.3). It is used when a date or place associated with the family is unknown or when the option at 10.1.1.5 is being applied.

◆ 10.10: LC recommends not requiring an identifier now. If JSC decides that an identifier should be required, LC notes that the default identifier now is the local record
control number; others could be added if they are readily available.

10.10.0.3.1: LC recommends deleting the second example because LC’s subject heading practice does not follow the guidelines in chapter 10.

CHAPTER 11

11.0.1.1, footnote 1: LC recommends using the AACR2 definition of “corporate body” (all three paragraphs in 21.1B1 minus the capitalization requirements – see comment at 11.2.0.3.1 below) because it is much more helpful than the one given here. Also see LC’s general comment about not giving definitions in footnotes when the definition can be retrieved by “mousing over” the term in the text.

11.0.2.2: LC recommends changing the wording to “Take variant names from any source.”

11.1.1.2: LC notes that this instruction calls for identifying a corporate body at a much more granular level than does 11.6 (Type of corporate body). See LC’s comment at 11.6.

11.1.1.3.1, 6th example: LC notes a typo: change “Nacional” to “National”

11.1.1.4: LC notes that “Associated institution” is not in the element analysis table. LC recommends that it be considered an element sub-type of “Place associated with the corporate body” because it is a type of place (and is to be used in lieu of local place in some situations).

11.1.1.6.1, examples: LC recommends removing the “Georgia” and “Russia” examples because (1) the RDA names would have qualifiers, and (2) most libraries will be keeping the unqualified AACR2 forms at the beginning of RDA implementation.

11.1.1.7, examples: LC suggests adding an explanation to the “World Cup (Soccer)” example to explain that the example was created by a cataloguing agency in the U.S.

11.1.1.7.3: LC recommends changing the wording to “If such a designation …” to be consistent in style and to clarify that it refers to 11.1.1.7 designations.

11.1.1.8.1, b) paragraph: LC recommends adding “if appropriate” because dates wouldn’t be given for a series of meetings. Also see LC’s comment for 11.1.1.8.2.

11.1.1.8.2 and 11.1.1.8.3: Because these two instructions are really exceptions to 11.1.1.8.1, LC recommends adding the label “Exceptions:” preceding 11.1.1.8.2. Two other exceptions are missing: (1) to use “online” as the place when the conference is online, and (2) to omit date when the name is for a series of meetings.
11.1.1.8.4: LC asks for guidance on how to combine more than one location when used in a preferred access point. For example, semicolons separating the repeatable element would be more clear than commas; omitting the conjunction “and” would aid in internationalization. (Also see the comment at 11.4.)

11.1.2.1.2: LC recommends changing the wording to “Make additions to the variant name ...”

11.2.0.2, new alternative: LC recommends adding an alternative to accommodate the principle in 8.2.4 of a generally-accepted form in the language and script preferred by the agency creating the data. Suggested wording is given below.

Alternative: Determine the preferred form of name for a corporate body by selecting a generally-accepted form of name in the language and script preferred by the agency creating the data.

11.2.0.3.1: LC recommends deleting the second sentence in the realization that some languages have changed capitalization practices (e.g., German) and that some resources present names in non-standard style for the language. Because RDA says in ch. 1 that found capitalization can be retained or other style manuals can be used, LC recommends not including such a strict requirement of what is or is not a name based on capitalization.

11.2.0.6.1: LC recommends changing the wording as shown below (to be consistent with wording in ch. 5):

Omit an initial article (see appendix C) unless the access point is to be accessed file under the article ...

11.2.0.6.2: LC notes that the alternative is the same instruction as 11.2.0.6.1 and recommends deleting the alternative.

11.2.0.8.3: On the second line, LC notes that the Wade Giles form Ssu li should be changed to the Pinyin form Si li.

11.2.0.10, subhead: LC recommends changing the subhead from “Transliteration” to “Names written in a non-preferred script” to be consistent with the subhead for 9.2.1.3.

11.2.0.10.1: LC recommends changing the wording as shown below because the context is script, not language.

If the name of the body is in a language written in a script that differs from the preferred script of the agency creating the data, transcribe the name according to the table for that script language adopted by the agency creating the data.

11.2.0.10.2: LC recommends deleting 11.2.0.10.2. It is really an instruction about found
transliterated form(s), not an alternative. However, the situation is already covered by 11.2.0.10.1.

**11.2.1.5e.3, 2nd-3rd examples:** LC recommends deleting these examples because they do not illustrate the rule; they show shortened forms of a conference name, not specific and general names.

**11.2.2.1:** LC recommends revising the wording as shown below to do a better job of communicating the use of both old and new names as preferred names and access points; there are times when resources using the new name will have been cataloged before resources using the old name.

If the name of a corporate body has changed (including changes from one language to another), choose the old name as the preferred name for use with resources associated with the old name and the new name as the preferred name for use with resources associated with the new that name, following the instructions in 11.2.0.3 for each.

**11.2.3:** LC notes it recommendation for post-first release tasks to merge the guidelines for non-government and government subordinate bodies.

**11.2.3.1.1:** Rather than send readers to 11.2.0 to find out the basic instruction, LC recommends revising the wording as shown below. Also, LC recommends using “directly under its own name” as the wording for instructions in chapter 11; different forms were noted (e.g., “record the name of the body directly” in 11.2.3.2.6).

Record the name of a subordinate body or a related body directly under its own name following the basic instructions given under 11.2.0, unless its name belongs to one or more of the types listed under 11.2.3.2.

**11.2.3.2.4:** To be consistent with Type 1 wording, LC recommends changing the wording to “TYPE 2. A name containing a term word . . .”

**11.2.3.2.6:** LC recommends (1) acknowledging that this instruction is the default action for all the types and (2) moving it to be part of 11.2.3.2.2.

**11.2.3.3:** LC recommends adding another “record as a variant name” instruction equivalent to the one in 11.2.6.3.2 as well as a reference to 11.3.4.

**11.2.6.2:** LC recommends adding a default instruction here: “In case of doubt, record the name of the body directly.”

**11.2.13.1:** LC notes that this instruction could be divided into paragraphs with some sentences rearranged as shown below to make the presentation easier to read.

Record the name of a delegation, commission, etc., representing a country
in an international or intergovernmental body, conference, undertaking, etc., as a subdivision of the preferred access point for the country represented. Record the subdivision in the language (see 11.2.1.3) of the country represented. Omit from the subdivision the name or abbreviation of the name of the government in noun form unless such an omission would result in objectionable distortion. If the name of the delegation, etc., is uncertain, record Delegation [Mission, etc.] (or equivalent terms in the language of the country represented).

Omit from the subdivision the name or abbreviation of the name of the government in noun form unless such an omission would result in objectionable distortion.

If the name of the delegation, etc., is uncertain, record Delegation [Mission, etc.] (or equivalent terms in the language of the country represented). If considered necessary to distinguish the delegation, etc., from others of the same name, add, in parentheses, the name in the form and language used for it as an access point of the international or intergovernmental body, conference, undertaking, etc., to which the delegation, etc., is accredited.

11.2.14.2: LC recommends deleting “of the Catholic Church” to make the instruction more applicable.

11.2.14.2, examples: LC recommends adding an explanation of what is on the resource.

11.2.16, subhead: LC recommends changing the subhead to “Subordinate religious bodies” to avoid confusion (11.2.6.2 includes “government” in the subhead).

11.2.16.1.1 and 11.2.16.1.2: LC recommends rewording these two instructions as shown below to give more content instead of just referring people away to other instructions.

Except as provided in 11.2.16.2-11.2.16.4, Record the names of subordinate religious bodies directly under their own names according to the instructions given under 11.2.3. Religious orders and societies are not subordinate bodies (see 11.2.1.5c).

Exceptions: Record the names of these subordinate religious bodies subordinate:

a) provinces, dioceses, synods, etc. (see 11.2.16.2)

b) Catholic dioceses, etc. (see 11.2.16.3)

c) central administrative organs of the Catholic Church (Roman Curia) (see 11.2.16.4)

For religious orders and societies, see 11.2.1.5c.

11.2.16.2: LC recommends combining 11.2.16.2 and 11.2.16.3 with one instruction for Catholic dioceses, etc., and one for non-Catholic dioceses due to different choices for the language for the name of the subordinate unit. LC did confirm with its catalogers that such structures do not exist within Islam and Judaism.
11.2.16.3.2, examples: (1) The example is confusing because the first line applies to 11.2.16.3.1; LC recommends deleting the first line and the word “but”.

(2) Because the instruction says “Bistum” is often used, it would be helpful to include an example or an explanation that uses that term.

11.2.16.4.1: LC recommends adding wording about creating an explanatory reference.

11.2.16.4.1, examples: LC notes it would be helpful if explanations were given for examples showing the found form of name.

11.2.17.1: LC recommends adding a reference to the instruction on government names: “… Add the name of the government (see 11.2.1.5d) to which …”

11.2.17.2: LC recommends adding a reference to ch. 16: “… Add the name of the country or other jurisdiction (see ch. 16) in which …”

11.2.17.2, examples: LC notes it would be helpful to add another example with a country used as the addition.

11.3.0.1.1: LC recommends changing to “A variant name for the corporate body …” (related to LC’s concerns about defining the same term differently in different chapters) in this instruction and throughout 11.3 (e.g., 11.3.0.2.1, 11.3.1.1.1).

11.3.0.3.4: LC recommends not giving “vice versa” in italics because it isn’t a term to be used in a name.

11.3.1: LC recommends changing the term in the subhead and elsewhere in 11.3.1 to “Expanded corporate name” so that content of 11.3.1 is clear for keyword searching, index terms, etc.

11.3.1.3.1: LC recommends rewording this instruction as below:

If the name chosen as the preferred name for the corporate body consists of or includes an acronym, initialism, or an abbreviated form of name, record as a variant name the expanded form of the name as a variant name.

11.3.1.3.2: Because a variant name is already optional, LC recommends simplifying the wording as shown below:

If the name chosen as the preferred name begins with an abbreviation, or contains an abbreviation in such a position that it affects access, and in the catalogue abbreviations are accessed differently from words written in full, record as a variant name the name with any abbreviated words written in full (in the language of the preferred name) as a variant name.

11.3.2.2.1: LC recommends changing “initialism” to “initialisms”
11.3.2.3.1: LC recommends rewording this instruction as below:
If the name chosen as the preferred name for the corporate body is a full form of the name, record as a variant name an acronym, initialism, or abbreviated form of the name as a variant name.

11.3.2.3.2 and 11.3.2.3.3: LC recommends combining these two instructions as shown below (no strikeouts or double underlining shown):

Record as a variant name any of the following forms if accessed differently:
   a) the acronym or initialism form of the name with full stops
   b) the acronym or initialism form of the name without full stops.

11.3.3.1.1: LC recommends revising the wording as follows: “transliterated form different from than the form recorded”

11.3.3.1: (1) LC recommends revising the wording as shown below. LC notes that deleting the “if” clause is a further simplification of the wording LC has suggested for other instructions; if JSC agrees to such a simplification here, the same deletions would be appropriate in other instructions for variant forms.

Record as a variant name any alternative linguistic form. If the name recorded as the preferred name for a corporate body has one or more alternative linguistic forms, record them as variant names.

(2) LC notes that the categories identified in the examples are relationships for variant names and could be considered as sub-types. LC also asks if variant names will have relationship designators.

11.3.3.3.2 and 11.3.3.3.3: LC recommends combining these two instructions as shown below (no strikeouts or double underlining shown):

If the name recorded as the preferred name contains a number expressed as words or as numerals in such a position that it affects access, record as a variant name any of the following forms if accessed differently:
   a) the name with the number expressed as words
   b) the name with the number expressed as numerals.

11.3.4.3.1: LC notes that the categories identified in the examples are relationships for variant names and could be considered as sub-types. LC also asks if variant names will have relationship designators for future machine-actionable applications based on identification of sub-types.

11.3.4.3.1, examples: The 2nd and 3rd examples do not illustrate this category; LC suggests moving them to 11.3.1.3.1.

11.4, footnote 10: LC recommends revising the wording as below (also see the “11.4,
A place associated with the corporate body generally is required for conferences, etc. (see 11.4.1). For other corporate bodies, a place is required when needed to distinguish an access point representing the body from another access point (see 11.1.1.3.1) unless the name of an institution, a date or dates associated with the body, or other designation provides better identification (see 11.1.1.3.7).

11.4. scope: LC recommends changing 11.4 to “Location of conference, etc.” and changing 11.4.2 to 11.5 for “Place associated with the corporate body.” Location of a conference is very different from a place associated with a corporate body; a location of a conference can be a local place, an institution, etc. A place associated with a corporate body is always a local place but it is much more than the location of the headquarters; it may be used by a cataloger to identify the body or make the name more useful (or as 11.1.1.3.2 says: “if the addition assists in the understanding of the nature or purpose of the body” – such a use is not mentioned in 11.4.2.

The current 11.4.1 instructions would need minimal reworking (see some recommendations in comments below).

The current 11.4.2 instructions could be simplified. The current 11.4.2.1 could be reworded as the new 11.5.1 as follows (no strikeouts or double underlining shown):

Record, as appropriate:
   a) the name of the place or jurisdiction that reflects the scope of the body’s activities
   or b) the name of the local place in which the body is located.

The current 11.4.2.4 would become 11.5.2 and be renamed “Change of name of place”

The current 11.4.2.4.1 would become 11.5.2.1 and be reworded as below:

If the name of the place, local jurisdiction, or geographic locality changes during the lifetime of the body, record the latest name in use in the lifetime of the body.

11.4.1.1: LC recommends changing “a local place” to “a location” to accommodate those conferences held in buildings, on ships, etc. (LC recently worked on a conference heading for a conference held in Petra, an extinct city.)

11.4.1.2: LC notes that this instruction to record the institution associated with a conference only as part of the authority data and not as part of the preferred name is a change from AACR2. Was that change intended?

11.4.1.3: LC notes that guidance similar to that in 11.5.1.3.1 for repeating the element is missing here. Also see the comment for 11.1.1.8.4.

11.4.2: See comment above at “11.4, scope.”
11.5, footnote 12: LC recommends revising the wording as below (also see LC’s comment at 11.1.8.2 about adding another exception for omitting the date for a series of meetings):

A date associated with the corporate body generally is required for conferences, etc. (see 11.4.1). For other corporate bodies, a date is required when a place or associated institution cannot needed to distinguish an access point representing the body from another access point (see 11.1.1.5).

11.5.0.3.2: LC recommends revising the wording as shown below to accommodate 11.5.1.3.2:

Record a date associated with a corporate body by giving the year alone unless a more specific date is needed.

11.5.1.3.2: LC asks if this form of date is based on ISO 8601. If so, should that standard be referenced as is done for names of languages in 6.13.0.3.1?

11.5.2: LC recommends changing the label from “required” to “optional” because Date of establishment is only one of the subelements of Date associated with the corporate body.

11.5.2.1, footnote 14: LC recommends revising the wording as below:

A date of establishment is required when a place or associated institution cannot needed to distinguish an access point representing the corporate body from another access point (see 11.1.1.5)

11.5.3: LC recommends changing the label from “required” to “optional” because Date of termination is only one of the subelements of Date associated with the corporate body.

11.5.3.1, footnote 15: LC recommends revising the wording as below:

A date of termination is required when a place or associated institution cannot needed to distinguish an access point representing the corporate body from another access point (see 11.1.1.5)

11.5.3.1.1: LC recommends revising the wording as below:

A date of termination is the date on which an organization was terminated, was or dissolved, or adopted a new name requiring a new preferred name (see 11.2.2).

11.6.0: LC recommends incorporating 11.6 into 11.7 as one of the other designations associated with corporate bodies. That is already the result when the type is “other” per 11.6.0.3.1.
11.6.0.3: LC prefers not to include a controlled list and suggests that the instruction be revised to read as “Record the type of corporate body using an appropriate term.” FRAD does not have a controlled list; it refers only to government body and conference as examples of types. JSC could keep a running list of terms after the first release of RDA and request submission of terms from RDA users.

11.7.0.4.2: LC recommends removing the prescribed terms giving in this instruction and deleting this instruction in favor of 11.7.0.4.1.

11.7.0.5.1: LC recommends referring to ch. 16.

11.7.0.6.1: LC recommends changing “preferred name” to “preferred access point” because it won’t be clear what is preferred name vs. additions.

11.7.0.7.2: LC recommends revising the wording for clarification: “If the presence or system of numbering is irregular, do not record it.”

◆ 11.12: LC recommends not requiring an identifier now. If JSC decides that an identifier should be required, LC notes that the default identifier now is the local record control number; others could be added if they are readily available.

11.12.0.3.2: LC recommends giving the second sentence as a separate instruction because it could also be applied to an identifier for which there is a prescribed format (11.12.0.3.1).

CHAPTER 16

16.0.2.1: LC recommends adding a paragraph c) as a default: “c) any source”.

16.2.0.2.1: LC recommends adding a paragraph c) as a default: “c) any source”.

16.2.3.1: (1) LC recommends renumbering 16.2.3.1.2 as 16.2.3.1.1 and revising the wording as shown below.

16.2.3.1.12: If the place name includes a term indicating the type of jurisdiction, retain the term in the name.

(2) LC recommends renumbering 16.2.3.1.1 as 16.2.3.1.2 and making it the exception to the basic instruction as shown below.

Exception:

16.2.3.1.24: If the first part of a place name is a term indicating a type of
jurisdiction and the place is commonly listed under another part of its name in lists published in the language of the country in which it is located, omit the term indicating the type of jurisdiction.

16.3.0.1.1: LC recommends changing the wording because this is not the definition for a “variant name.” Suggested wording: “A variant place name is a name …”

16.3.1: LC recommends changing the term in the subhead and elsewhere in 16.3.1 to “Expanded place name” so that content of 16.3.1 is clear for keyword searching, index terms, etc.

16.3.1.3: LC notes that it is difficult to recognize the difference between 16.3.1.3.1 and 16.3.1.3.2; also, the first example seems to illustrate the second rule. LC recommends deleting 16.3.1.3.2 and rewording 16.3.1.3.1 as below:

If the name chosen as the preferred name of the place contains an initialism or an abbreviated or shortened form of name, record the expanded form of the name as a variant name.
[4 examples currently in 16.3.1.3]

16.3.2: LC recommends changing the term in the subhead and elsewhere in 16.3.2 to “Initialism/Abbreviated form of place name” so that content of 16.3.2 is clear for keyword searching, index terms, etc.

16.3.3: LC recommends changing the term in the subhead and elsewhere in 16.3.3 to “Alternative linguistic form of place name” so that content of 16.3.3 is clear for keyword searching, index terms, etc.

16.3.3.1.1: LC recommends revising the wording as follows: “transliterated form different from than the form recorded”.

16.3.3.3.1: LC notes that the categories identified in the examples are relationships for variant names and could be considered as sub-elements. LC also asks if variant names will have relationship designators.

16.3.3.2 and 16.3.3.3: LC recommends combining these two instructions as shown below (no strikeouts or double underlining shown):

If the name recorded as the preferred name contains a number expressed as words or as numerals in such a position that it affects access, record as a variant name any of the following forms if accessed differently:
  a) the name with the number expressed as words
  b) the name with the numbered expressed as numerals.

◆ 16.6: LC recommends not requiring an identifier now. If JSC decides that an identifier should be required, LC notes that the default identifier now is the local record
control number; others could be added if they are readily available.

CHAPTER 29

29.0.2: (1) LC notes that it isn’t clear where such relationships are to be recorded. Chapter 2+ refers to “description.” What context should be given here?

(2) LC also recommends changing wording at the end of the sentence to “… represented by a preferred access point and preferred access points for related persons, families, and corporate bodies.”

29.1.1.2: LC recommends revising this definition to match that in 8.1.1.2: “The term person refers to an individual or to an identity established by an individual (either alone or in collaboration with another individual).”

29.1.3: The terms here are defined differently in other chapters. How will the differences here be reconciled with single definitions in the glossary?

29.3.1: LC recommends giving here only “Preferred access point for the [person, family, or corporate body]” because the preferred name plus other attributes as appropriate (29.3.2 and 29.3.3) are addressed in ch. 9-11. LC recommends deleting 29.3.2 and 29.3.3.

29.7.0.3: LC notes that this chapter lacks an instruction for making annotations for the end user. Many of the examples in 5.10 instructions would be helpful public notes (Real name …; Valid for …).

CHAPTER 30

30.1.0.3a, first example: LC recommends using the term “identity” instead of “persona”.

30.2.0.3.2: LC has questions about such explanations and looks forward to seeing appendix E.

CHAPTER 31

31.0.3a, examples: LC recommends deleting these examples of LC’s subjects for these families because the form of these subject headings do not follow the RDA instructions.

31.2.0.3.2: LC has questions about such explanations and looks forward to seeing appendix E.
CHAPTER 32

32.1.0.3b.1, 2\textsuperscript{nd}-3\textsuperscript{rd} examples: LC notes that the explanation here doesn’t include the specific earlier/later information for these bodies given in explanations for 2\textsuperscript{nd}-3\textsuperscript{rd} examples in 32.1.0.3a.1. Was that intentional?

32.2.0.3.2: LC has questions about such explanations and looks forward to seeing appendix E.

APPENDIX F

F.0: LC recommends adding a general statement about giving variant access points for forms not chosen as the preferred access point. The presence of instructions on variant access points is inconsistent in the appendix: a general instruction at F.1.1.2.2 for a name in the Arabic alphabet, no instructions for F.2 or F.3, some specific instructions (e.g., at F.4.1.2, F.5.1.1.5, F.5.1.2.2), no instructions in F.11.

F.2.1.1.1: To remove the term “vernacular,” LC recommends changing the wording as shown below:

For a Burmese or Karen name that is preceded by includes a Western given name preceding the vernacular name(s), record the Burmese or Karen vernacular name(s) as the first element. Transpose the Western name to the end.

F.6.1.3.1: LC notes the presence of unnecessary spaces in paragraph c).

F.6.1.7, footnote 4: LC suggests including the list at this position in appendix F rather than sending the user to another chapter.

F.7.1.4, footnote 6: LC suggests including the list at this position in appendix F rather than sending the user to another chapter.

F.11: (1) LC recommends adding a general guideline that this section is to be applied within the context of chapter 9. LC doesn’t want someone to end up here and think that everything they need to know about such names is in this appendix.

(2) LC recommends adding another general statement about giving variant access points for forms not chosen as the preferred access point. Such a general instruction is in F.1.1.2.2 for name in the Arabic alphabet.

APPENDIX G

Indonesian titles: LC suggests moving this information to F.6.1.7.

Iban titles: LC suggests moving this information to F.7.1.4.