To: Joint Steering Committee for Development of RDA  
From: Dave Reser, LC Representative  
Subject: Transcription Issues Associated with the Production Statement (RDA 2.7)

Thanks to ALA for raising these questions about production statement. We offer the following comments.

1. Does the JSC agree that requiring transcription of information from unpublished resources is not the most effective way of supporting the FRBR user tasks?

LC response: Not necessarily. Like the answer to so many cataloging questions, "It depends on the resource." Unpublished resources are a large variety of materials that may only have their "unpublished" status in common. For manuscripts and typescripts of works intended for later publication (e.g., novels, research reports, official communications), there is often full production statement information on the resource. For realia and personal papers, we would not make any categorical statements because there is such a difference even within the same format. We would agree that transcription issues are more challenging for unpublished resources. Because they are often not produced for public consumption, a uniformity and clarity of data presentation may be lacking.

Publishers often have a consistent layout and style for the resources they publish. We could identify a Franco Angeli book from 10 feet away and tell you where to find the imprint information, series number, etc. For a Newcomb College vase, we could probably identify it from the same distance and tell you that on the bottom of the vase, there will be the following marks—an NC (with the C encircling the N) the potter's initials (e.g., JM for Joseph Meyer), the decorator's mark (e.g., AFS for Anna Frances Simpson) and a number-letter code indicating the year of the vase (e.g., EW89 for 1911). However the difference between the publication information found on the Franco Angeli book and the production information found on the Newcomb College Vase is that a user just has to know a little bit of Italian to understand the Franco Angeli publication statement, but a user has to have a specific knowledge of Newcomb pottery markings to understand a production statement like this: [New Orleans] : AFS : JM, EW89. However, for the user with knowledge of Newcomb pottery, those markings are as easily readable as "Milano : Franco Angeli, [2013]."

We agree with ALA’s assertion that information appearing on the item may be illegible, incomplete, etc., and may have been supplied by later owners, dealers, etc. (These are challenges for description of archival resources using any cataloging standard.) The cataloger must analyze the situation to determine which RDA elements are actually
represented on the resource, and which pieces of information were later additions and not necessarily representative of an RDA element other than a “note on…” element. This task is necessary whether one is “recording” or “transcribing.”

2. Does the JSC agree that recording information related to the Production Statement and changing the sources of information hierarchy outweighs the benefits of consistency between the instructions for the Production, Publication, Distribution, and Manufacture Statements?

**LC response:** Because RDA is a general cataloging standard, we prefer the consistency of instructions for overall application of RDA to a variety of resources. However, we acknowledge that for some types of resources and the needs of some users, an alternative at 2.7 to record production information and then provide the information as found on the resource in a note would be useful. The Newcomb vase example is a good case to demonstrate how for a specific community of users, transcribing the markings in a production statement provides identification, but for a broad community of users, it does not. We also acknowledge that for an agency with a specialized collection of resources, RDA may not be the best standard for their resource description needs. In our LC-PCC PS for 0.2, we list several other descriptive standards that we use instead of RDA for some of our special collections.

3. Does the JSC agree that the revision proposal outlined by ALA should be undertaken?

**LC response:** We would support a proposal to include Alternatives in 2.7 that provide flexibility, but we would not agree to the type of proposal outlined in Tentative Recommendations 1-3.

a) Should a revision of 2.7 include the removal of the sub-elements Parallel Place of Production (2.7.3) and Parallel Producer’s Name (2.7.5)

**LC response:** No. For resources that do not have these elements, they would not be recorded. For resources that do have them, there is a need to provide instructions. Although we do not recall seeing any unpublished resources with these elements, we would never assume that they are not present on some resources.

b) Should any of the elements listed under “Additional Considerations” above also be part of such a proposal?

**LC response:** we do not understand this question or the paragraph "Additional Considerations" in the discussion paper. Is ALA asking about the use of the terms "transcribe" vs. "record" in chapter 2? If so, we believe that is sufficiently covered. The sub-element **place of production** is recorded following the
guidelines for recording the **production statement** element (2.7.1.4). The instruction for the element says to *record* it by *transcribing* it following the instructions in 1.7. This is the model used throughout chapter 2. Recording is the act of providing the data, and transcription is the methodology used in recording. See 6JSC/RDA/Editor's guide/rev/2, Section 7.7 for more information on *transcribe* vs. *record*.

If ALA is asking about whether to include the removal of the parallel elements for title, statement of responsibility, and edition, as they propose in 3.a) above, we do not agree.

4. **Does the JSC feel that recording production information as relationships (and potentially, publication, distribution, and manufacture information as well) is an idea that should be pursued?**

**LC response:** Yes, we look forward to hearing more from ALA about this issue.

**Comments on the Appendix 2: Examples**

**Example 3. Ellen Fenton Diaries**

During our discussion, we found ourselves confused about the table data. The table shows "Haven Green House, Ealing, London" or "London" being transcribed as the place of production based on the inscription "Mrs. Fenton / Haven Green House / Ealing / London." Many place names may be mentioned within a resource in different contexts, and they are not necessarily places of production, etc. According to the Yale Center for British Art's finding aid for this diary, Ellen Fenton lived at Haven Green, Ealing, London. This example seems like a clear case of the diarist's name with her address below. People often write their name and address on their books so they can be returned if lost. We suggest that this is not a place of production and that the resource lacks a production statement. Thus, there is nothing to be transcribed for place and producer's name, but they can be supplied. The production statement would read:

[Boulogne-sur-Mer, France] : [Ellen Fenton], 1854-1862.

**Example 6. Autograph letter**

Although the date of production is known to be incorrect, transcribing it as found on the resource is useful for identification because that is the date people see on the resource. We certainly agree that providing the correct date of production in a note is also helpful to the user, but RDA 2.7.6.3 already provides instructions for this situation: "If the date as it appears in the resource is known to be fictitious or incorrect, make a note giving the actual date (see 2.17.6.3)." This instruction parallels the one for date of publication. We
do not believe that the transcription of incorrect production information is less valuable than publication information for supporting user tasks.