To: Joint Steering Committee for Development of RDA
From: Kathy Glennan, ALA Representative
Subject: Place Associated with the Corporate Body (Revision of RDA 11.3.1, 11.13.1.3)

ALA thanks the BL for this proposal. While we sympathize with the concerns raised, we do not support these changes to RDA.

During the ALA discussion, the following points were raised:

- As BL notes, FRAD’s model of place attributes differs between persons and corporate bodies, and this difference is reflected in the current RDA instructions. We believe that any new element sub-types for place that are proposed for RDA (such as country associated with the corporate body and other place associated with the corporate body) should be introduced in the FR models before being proposed for RDA. We are concerned about venturing prematurely into addressing place with respect to corporate bodies while the FR consolidated model is under development; this could necessitate future revisions to undo the matter under consideration.

- While we agree that the scope note at 11.3.3.1, Location of Headquarters, includes two different definitions, the instructions themselves currently address both headquarters and the place where a corporate body carries out its activities. These two aspects can be dealt with in the same instruction (as in RDA currently) or be separated (as BL proposes). ALA tends to prefer retaining the current wording.

In either case, it is important that both the instructions for location of headquarters and those for place where a corporate body carries out its activities allow for the recording of a local place when appropriate. The BL proposal limits the recording of local place to location of headquarters. However, there are certainly corporate bodies that carry out their activities in a local place.

- In modifying the instructions for Place Associated with the Corporate Body to better mirror the equivalent instructions for Persons, the proposed revision has broken the parallel between 11.3.2, Location of Conference, Etc. and 11.3.3, Location of Headquarters. We believe that it would be better to retain the clear distinction between conferences and other organizations. We further note that the proposed new element sub-types are not applicable to conferences.

- If alignment with FRAD were not a consideration, ALA believes that a changing the title of 11.3.3, Location of Headquarters to Location of Organization would be beneficial.

- We are unsure of the value of separating Country from Other Place; we believe that the difference in levels could be accommodated within a single instruction.
If the JSC desires to move forward with this revision, ALA offers the following comments on the proposed revisions:

1. 11.3, *Place Associated with the Corporate Body*. As noted above, ALA believes that the instructions in 11.3 should still accommodate recording a local place where a corporate body carries out its activities.

2. 11.3.1.1, *Scope*: ALA recommends retaining the e.g. statement; these are just exemplars of what is addressed in this instruction.

3. 11.3.3, *Location of Headquarters*. As noted above, ALA recommends changing this instruction name to *Location of Organization*.

4. 11.3.3.1, *Scope*: If the definition of “location of headquarters” is changed here, it also needs to be modified in the Glossary.

5. 11.3.3.3, *Recording Location of Headquarters*:
   a. This instruction has several examples that show the location of the headquarters as a county. With the proposed revision, the county would no longer be recorded as the location if the city is known. For instance, the Washington County Historical Society examples have specific locations that can be identified below the county level: Salem, Ind. for the first of these, and Fort Edward, N.Y. for the second. ALA does not believe this is a particularly useful change and notes that at the very least, these examples would need to be updated.
   b. The following example needs to be removed from the (new) first example block and relocated to the final example block in this instruction instead:

   Duisburg, Germany
   Essen, North Rhine-Westphalia, Germany
   Preferred name recorded as: Universität Duisburg-Essen. Corporate body has headquarters in two locations

6. 11.3.4.1, *Scope*: The definition of the new sub-element, “Country associated with the corporate body” needs to be added to the Glossary.

7. 11.3.4.2, *Sources of Information*, and 11.3.4.3, *Recording Country Associated with the Corporate Body*, should be revised to use “country or countries”, following the established pattern in 9.10, *Country Associated with the Person*.

8. 11.3.5.1, *Scope*:
   a. The definition of the new sub-element, “Other place associated with the corporate body” needs to be added to the Glossary.
   b. ALA recommends rephrasing the beginning of this sentence from “An other place…” to just “Other place…”. Similar phrasing occurs at 9.6.1.1, for “Other designation associated with the person”.

9. 11.3.1.3, *Place Associated with the Body*, final example box:
   a. Remove “country” from the title.
b. Remove the four country examples that have been separated into the previous example box.

10. If RDA is updated with the proposed new element sub-types in Chapter 11, *Place Associated with the Corporate Body*, similar changes should be made in Chapter 10, *Place Associated with the Family*. 