To: Joint Steering Committee for Development of RDA  
From: Dave Reser, LC Representative  
Subject: Simplification of RDA 2.7-2.10

Thanks to the British Library for analyzing the issues related to the statements found in RDA 2.7-2.10, a complex topic.

General Comments

On one hand, we feel bound to the statements and sub-elements while in our current MARC environment, but we also feel that being able to record relationships to place, name, and date will be important in the linked data future (in addition to, not instead of). We strongly agree with the BL that both the ‘identification’ and linking functions must be supported. While the current statements and sub-elements may have their challenges in application, just about any approach would. For example, treating the “publisher” (etc.) as a relationship to name of the corporate body is a solution, but will result in challenges: the rate of publisher mergers and splits, complications with “imprints,” and inconsistent use of names by the same publisher from resource to resource. We don’t necessarily agree that the “count” of instructions in RDA pose difficulties for catalogers, and do not wish to go back to a standard that aggregates the different types of statements.

We do agree with the BL suggestion that “core” and “core if …” statements are overrepresented in the 2.8-2.10 instructions, and have recommended removal of them in our response to 6JSC/ALA/29.

We note that in our current environment, the attributes in bibliographic records are repurposed in many ways that may not be as receptive to significant changes in the sub-element approach. For example, many catalogs have a “cite this record” feature that end users heavily rely on to build citations or import into citation software.

We also believe more discussion related to the concept of “event” needs to take place, as the word could apply to many things: publication events, preservation events, events such as conferences, events such as historical events, documentary events, etc. A clear understanding of these differences needs to be considered in the application of any model.

Questions

1. Is there a preference for Scenario A, Scenario B., or Neither Scenario?

While we have a clear preference for Scenario A over Scenario B, we don’t believe either is a significant improvement over the current RDA instructions. Scenario A as presented likely represents an oversimplification for recording information, e.g., presuming that the information comes from a single source,
rather than the reality we are often faced with: publisher from a title page, place (or places) of publication from a verso, distribution information from other sources, dates in many places—there is seldom a single, simple statement to transcribe. It is difficult to understand how simple transcription would apply to some of these common situations. For those not interested in the sub-element approach in the current instructions, we could see Scenario A presented as Alternative instructions to the “statements” in RDA.

2. Is there a preference for further work on:
   a. the entities option (Place & Timespan):
      Yes, we would like to see how this might play out as an additional technique to recording the statements.
   b. the attributes option:
      This does not seem as appealing.

3. Should production be treated in the same way as Publication, Distribution and Manufacture or is it different as argued by 6JSC/ALA/Discussion/4?
   See the LC response to the ALA discussion paper—we generally feel that these statements should be treated consistently, although an alternative approach was suggested.

4. Should the approach to simplification of PPDM statements be applied to Edition Statement and Series Statement?
   We would defer discussion on the series statement at this time—we’re not sure we see the value and recognize the importance this statement holds for many stakeholders. We are more likely to support additional simplification of the Edition statement.

5. Is it appropriate to define element sub-types as is proposed in Date of Manifestation when the instructions are the same for each sub-type?
   Although we do not favor the “attributes” option, we believe if this approach were taken the instructions should be as clear as possible, even if this results in duplication.

6. Issuance Statement has been proposed as a neutral label for the disaggregated element encompassing Production, Publication, Distribution, and Manufacture:
   a. Is issuance an acceptable term—given that un-published and found objects are in scope?
We recognize that choosing an aggregate term is very difficult, and note that MARC had the same issue when the decision was to define the 264 field with varying indicators for type—the very long “Production, Publication, Distribution, Manufacture, and Copyright Notice” label was used as a result.

b. Should RDA continue to use “statement” if there is no longer a clear link with ISBD area 4?

We do not have a definitive answer at this time, but are open to further discussion.