To: Joint Steering Committee for Development of RDA
From: Kathy Glennan, ALA Representative to the JSC
Subject: Larger place – Revision of RDA 16.2.2.4 (Recording the Preferred Name); 16.2.2; 16.2.2.9.1; 16.2.2.9.2; 16.2.2.10; 16.2.2.10.1; 16.2.2.11; 16.2.2.11.1; 16.2.2.12; 16.2.2.13; 16.2.2.14

ALA thanks DNB for this proposal to address options for recording larger places in RDA. While we sympathize with the issues raised, we do not support the proposal as written. We offer the following comments and observations:

**Recording the larger place or jurisdiction as a separate element or as a relationship**

6JSC/ALA/19 suggested two possible ways of treating larger places: as a separate element or as a relationship. The responses to that proposal indicated support for treating larger/smaller place as relationships. Until a decision has been made between these two options, this proposal seems premature. ALA has a preference for the relationship approach. An ALA task force is currently working on clarifying and suggesting revisions to RDA instructions on the recording of place names; recommendations arising from that group will be available in 2014.

**Naming the larger place**

The DNB proposal does not include the addition of an element for Name of Larger Place in RDA, which we believe is critical. Without these instructions, the proposed alternatives cannot be applied.

**Character strings vs. codes**

While ALA sympathizes with the value of including a language-neutral means of recording the name of the larger place, we believe that RDA should support recording this information in a controlled form determined by the cataloguing agency. This could take the form of a character string or a code. Indeed, there are many elements in RDA that could be represented by codes, beyond names of countries.

We would support the expansion of RDA 0.12 to allow for the use of alternative vocabularies, including codes, for recording preferred names.