

To: Joint Steering Committee for Development of RDA  
From: John Attig, ALA Representative  
Subject: Language of expression: Revision of RDA 6.11, 6.11.1.3, 6.11.1.4, 7.12.1.3

ALA thanks EURIG for its discussion of the Language of Expression element. ALA is sympathetic to the need for additional guidance, but does not support all of the specific revisions proposed.

- 1. 6.11, core requirement.** ALA believes that Language of Expression should be a core element; we are generally in agreement with the deletion of “when needed to differentiate an expression of a work from another expression of the same work.” We agree that an exception must be made for expressions with no significant language content, to cover non-vocal music, graphic images without text, non-verbal sound, etc. Although core elements are applied “if applicable”; however, we would prefer to see an explicit statement. We suggest that the condition be worded “unless the expression has no language [or *linguistic*] content.” Whether it is necessary to say “no significant language content” depends on whether the inclusion of a title page or other source of bibliographic information constitutes language content.
- 2. 6.11.1.3, optional addition.** Although some ALA reviewers believe that a distinction should be made between the language of the original expression and the language of other expressions, ALA does not support the optional addition of qualifiers. We agree with the Library of Congress that these are better handled as relationships, with appropriate relationship designators.
- 3. 6.11.1.4, examples.** ALA does not support the optional addition of qualifiers.
- 4. 7.12.1.3, examples.** ALA does not support the optional addition of qualifiers. In addition, we note that some of the information being added to the examples pertains to a particular manifestation, rather than to an expression.