To: Joint Steering Committee for Development of RDA
From: John Attig, ALA Representative
Subject: Chapters 12–16, 23, 33–37 (Group 3 entities and “subject”)

ALA thanks the Library of Congress for preparing a very thorough and stimulating discussion of issues involved in adding subject entities and relationships to RDA.

**ALA Organizational Background**

This discussion paper presented a challenge for ALA. The policies and procedures in place for approving ALA proposals and responses cover only the scope of AACR2. Subject analysis is outside the scope of the Committee on Cataloging: Description and Access, which authorizes ALA positions on issues related to RDA. Therefore, new institutional relationships needed to be formed in order for the appropriate group — the Subject Analysis Committee — to discuss and approve ALA positions relating to subject entities and relationships in RDA.

This has been done. The present document has been informed by comments from both groups, and has been authorized by both groups independently.

**General Comment**

ALA has mixed feelings about the issues raised in this discussion paper.

On the one hand, ALA shares the concerns expressed by the British Library Representative that RDA should not stray too far from — or advance too far beyond — the current definitions in the FR models. This means that the subject relationship should be limited to work-to-subject relationships, and that the current scope of the Group 3 entities should be respected.

On the other hand, ALA is aware that the FR model is incomplete. We are particularly concerned about the exclusion of genre/form entities and relationships from the model. Any model that does not include such relationships is seriously deficient. There are other relationships (such as Coverage of content) that are also missing. As noted below, any bibliographic relationship between any bibliographic entities should be supported.

ALA therefore recommends:

1. The Joint Steering Committee urge the FRBR Review Group to initiate work on expanding the model to additional entities and relationships — and cooperate actively with the Review Group in carrying out the work.
2. Until there is a definite sense of direction for expansion of the FR models, the JSC should be extremely cautious about extending the FRBR entities and relationships beyond their current definitions.

**Suggested Process for Adding Content to RDA**

a. *Add definitions for the additional FRBR entities.*

   ALA agrees that the best procedure at this time is to add specifications for the FRBR Group 3 entities and subject relationships to RDA. At the same time, the Joint Steering Committee should engage with the FRBR Review Group in its efforts to reconcile the existing FR models and to expand the FR model to include other entities and relationships.

b. *Add attributes and relationships at a general level.*

   ALA agrees with this approach, and underscores the importance of keeping the RDA specifications sufficiently general that they are applicable to any possible system of subject terms (or codes) or classification.

   With regard to the Thema/Nomen approach of FRSAD, we note the point made by Gordon Dunsire in a presentation in June,¹ that there is a property-subproperty relationship between Thema and the Group 3 entities (indeed all the FRBR entities). Given that, we suggest that consideration be given to defining Thema as an entity (with appropriate attributes) in RDA Chapter 12 (the General Guidelines chapter in Section 4).

c. *Add “constructing authorized access points” for Manifestations and Items, but leave access points for Concepts to subject systems. For Items, recognize manuscripts as Objects (as opposed to the works contained in the manuscripts) that need to be named as the subjects of other works.*

   ALA agrees that instructions for constructing access points (both authorized and variant) for Manifestations and Items should be added to RDA. We agree that instructions for constructing access points for Concepts (and probably for Objects, Events, and some Places) need to be left to the specific systems used.

   ALA does not agree that manuscripts should be treated as Objects; we prefer to conceive of manuscripts as works — which may indeed be independent of the (literary) works they embody — but works nonetheless.

d. *Follow the instructions now given for the attributes and construction of access points for conferences, etc., and move them to events; remove the instructions treating conferences, etc. as corporate bodies.*

¹ [http://www.libraries.psu.edu/tas/jca/ccda/docs/FRSubjects.pptx](http://www.libraries.psu.edu/tas/jca/ccda/docs/FRSubjects.pptx)
ALA does not have a consensus to treat conferences as events instead of as corporate bodies. This reflects our agreement with the British Library Representative that the specifications for the Group 3 entities (for now, at least) should be limited to their use in a work-to-subject relationship, and the conviction of a significant number of reviewers that conferences can be the creators of their proceedings. We suggest raising this as a general issue for discussion with the FRBR Review Group, and proceeding cautiously until the direction of development of the FR models is clearer.

e. *Continue discussions about Items/Objects and Events/Expressions and subjects of Expressions.*

   ALA is skeptical about the changes suggested here, but we welcome further discussion — which should include consultation with the FRBR Review Group.

f. *LC will provide completed chapters following the model shown here for Related concepts.*

   ALA had earlier agreed to accept this offer with our thanks.

**General Issues to be Discussed**

#1. *Do we wish to declare for RDA that subjects exist only at the Work level?*

   ALA is conflicted on this issue, as indicated in our general comment above.

   For the present state of the FR models, ALA agrees with the British Library Representative that we should respect the current limitation of the model to the work-to-subject relationship.

   On the other hand, ALA also feels strongly that the current model has some significant limitations. In particular, any model for bibliographic entities and relationships that does not include genre/form entities and relationships is seriously flawed — which may occur for any of the Group 1 entities.

   Ideally, any entity should be capable of being related to any other entity by any type of relationship that is appropriate. The FR models should be expanded towards that general goal.

   ALA recommends that the Joint Steering Committee urge that the FRBR Review Group initiate plans to expand to additional entities and relationships, in particular to accommodate genre/form relationships, but also to deal with possible subject relationships for Expressions. Pending expansion of the model, ALA urges extreme caution in going beyond the bounds of the current models.
#2. **Should Object be expanded to include Item?**

ALA is not convinced that it is appropriate to treat manuscripts and other unique items as Objects. However, we would not object to the issue being discussed with the FRBR Review Group.

#3. **Should we consider Events as Expressions?**

ALA is not convinced that it is appropriate to treat events as expressions of a work, but we welcome further discussion of the issue.

#4. **Do we want to include Time as an entity?**

ALA agrees with the British Library Representative that we should be cautious in expanding the FR model in this way. On the other hand, it is clear that there are time periods that have names and are used within access vocabularies. We feel that this issue is worth further exploration, but are reluctant to leap ahead until the implications have been studied, in consultation with the FRBR Review Group.

ALA is particularly concerned by the issue of overlap with Time attributes, such as dates of birth. There will be a need to be very cautious in distinguishing Time as an entity from Time as an attribute. One approach might be to limit the Time entity to named time periods (probably excluding time periods named by a range of dates); however, that is severely limiting and is unlikely to match the specifications for the chronological facet in some controlled vocabularies.

#5. **There will be an impact on chapters 18/19–22, 24/25, 29, and Appendices I, J, and K.**

ALA agrees that these chapters and appendices will need to be revised. ALA notes that RDA currently contains a placeholder Appendix L, Relationship Designators: Relationships Between Concepts, Objects, Events, and Places; relationships between instances of Group 3 entities should be covered here, not in Appendix K.

#6. **Source will also need to be examined for chapters 2, 3, 6, 9, 10, and 11 for the Group 1 and Group 2 entities when used as subjects.**

ALA agrees that the subject/classification system itself as the source for subject entities will need to be documented.

#7. **RDA may just follow its own guidance on Group 1 and Group 2 entities regardless of their use or relationships, or may wish to allow use of other sources when such entities are used as subjects of works.**

ALA believes that RDA should follow its own guidance in matters that where RDA is authoritative, but we believe that RDA is not authoritative for the detailed content of subject entities and attributes. We expect the instructions in RDA relating to these to operate at a
sufficiently high level that they do not conflict with the specifications of any subject system to which they may be applied.

#8. There needs to be a re-examination of “core” when entities are the subject of a work.
    ALA agrees.

#9. We need to add examples for explanatory references in E.1.3.4.
    ALA agrees.

#10. We need to return to constructing access points for manifestations and items, so that they may be used as subjects.
    ALA agrees.

#11. We should consider adding Time as an entity.
    See discussion under #4 above.

#12. We need to review the impact of work needed for Appendix K.
    As noted above, relationship designators for relationships between instances of Group 3 entities are to be covered in Appendix L. There may be an effect on Appendix K, but probably not as much as the paper suggests.

#13. We need to add information to Appendix J descriptive relationships that can be considered subject relationships, and add content to Appendix K for concept-to-concept relationships.
    ALA agrees.

#14. We need to add general information about the subject relationship between Group 2 entities and works in Chapter 18 and perhaps Chapters 19–22.
    ALA agrees.

#15. We need to write general instructions for Chapter 23.
    ALA agrees, but notes that such a set of guidelines for subject analysis needs to be sufficiently general to accommodate the specifications of any subject system to which they are applied.

**Possible Content for Chapters in Section 4**

**A. Chapter 13, Concept**

ALA agrees with the outline presented. We note that “term” and “variant term” need to be sufficiently broad to cover classification notation and indexing terms, as well as subject terms and codes. “Term” may not be the right word.
B. Chapter 14, Object
ALA offers the following questions/comments:

- We agree with the point made under “Scope” that it will be necessary to distinguish between Object and Item.
- We note that the attributes are all related to the Object as “a material thing”. However, we see the potential need for attributes that relate to content, such as object type, creation place and date, etc.
- It is not clear to us whether Object includes classes of objects or generic categories such as substances (e.g., Iron). The boundary between Concept and Object may also need further clarification.
- We do not agree with the suggestions about including non-subject relationships and any specific instructions about naming Objects.

C. Chapter 15, Event
ALA agrees generally with the outline. We have already expressed our reservations about the shift of conferences to the Events entity.

D. Chapter 16, Place
ALA agrees generally with the outline. We offer the following comments:

- The suggestion to treat classification notation as an identifier is misguided. The classification notation is in fact the name of the classification entity.
- The paper uses the word “concept” in this context; Concept is a separate entity.
- We suggest the need for the following additional attributes:
  
  - Type of place (jurisdiction, natural feature, etc.)
  - Contiguity
  - Level of specificity

E. Chapter ?, Time
ALA reiterates its reluctance to define Time as an entity before it has been formally incorporated into the FR model. However, we agree that this outline raises some of the issues that will need to be decided, in particular those involving scope.

If Time is to be an entity, then it will need to function as a facet for chronological information, which argues against too narrow a definition. The experience of the FAST project demonstrated the need to define somewhat informal spans of time such as centuries and decades in order for them to stand on their own as separate entities. Even spans of years might be legitimate instances of a Time entity.
All of this needs to be considered in the light of the various subject systems to which the model will be applied. We should be careful not to make the specifications too narrow to allow them to use RDA.