To: Joint Steering Committee for Development of RDA

From: Margaret Stewart, Chair, JSC

Subject: RDA: Resource Description and Access – Full Draft – Review by the National Library of Spain

These are comments on the full draft of RDA received from the National Library of Spain.

To: Joint Steering Committee for Development of RDA

From: Elena Escolano Rodríguez, representing Nacional Library of Spain

Thank you for the invitation to comment on the RDA.
Our comments are organized as follow: After general comments on RDA we present the comments on each chapter arranged with general comments first, then on specifics instruction by number, and finally some error detected in the chapter. We warn that no big attention has been paid to these errors, and not all the references have been checked, but we expose here some of them detected, in case it could be of help.

General comments on RDA:
The structure of the chapters is rather inconvenient to make out a general idea on how to construct an access point, or how to piece together all the elements of information described before. The related information is scattered. Instructions closely related are too far one from another and it is necessary to look out many different chapters. To avoid this confusion, it is recommended either to rearrange the order inside the chapters. At the same time this structure, of information scattered for many chapters, makes difficult to value the code, or to check if something is missing or valuate if it is clear and easy to use by the cataloguer or is misleading. Even this is impossible when the references are wrong.
More abide by International Cataloguing Principles would be desirable.
There is a general impression that RDA has made an effort to apply the theory of FRBR but has remained in the middle of theory and practice. FRBR seems to be clearer than RDA. More alignment with FRBR terminology would make it clearer. RDA says in many places that recording relationships is not required, but relationships are fundamental in FRBR.
The structure of the recorded information recommended in RDA is not clear, notstructured, what seems not to be useful, in order to be understandable, by presenting the examples without the international structured language that is ISBD. So, it is doubtful the affirmation that RDA is designed for an international context, when it is recognized the Anglo-American tradition, and it is doubtful the role of the international structured language that is ISBD in RDA. Under our point of view, to give ISBD in an appendix is not enough to make the code clear, even more when one of its principles is to "understand". RDA is difficult to valuate as the instructions and recommendations on presentation ae missing, so we have no idea how this information will be displayed following RDA, and much of the consistency and understand of the information depends of the display.
RDA allow many options and alternatives for the cataloguing centre to decide on without establishing an order of preference, which is what is supposed to do a cataloguing code. For example the rule of three has disappear, now is the rule of the "first" which very restrictive, but in the other hand RDA allow to make as many access point as the cataloguer wish, which is not cost-effective.
We recommend an editorial revision of the following:
References, that in RDA are much more important than other codes, as some instructions has not sense without the reference and these don't exist. Different type of letter, misspellings, etc.

Chapter 0

0.0 The function "Understand" is neither in FRBR nor FRAD. In the latter, there was a "contextualize", although it is not sure they both match. It would be better to use the same FRBR terminology.

Some of the International Cataloguing Principles are missed. The necessity side of the sufficiency and necessity principle and significance, both concerned with the relevance and accuracy of the information in the bibliographic record.

0.4.3.4 2nd paragraph does not abide by International Cataloguing Principles (ICP), 6.3.2.1, where the acceptance of an authorized point of access in the language of the agency creating the data occurs only when the original language or script is not normally used in the catalogue. But rule 0.4.3.2, 2nd paragraph, seems to imply that the agency's language of preference can always be chosen. The same goes for the 2nd paragraph of 0.4.3.7 regarding titles.

0.4.3.7 In the phrase "if the original language and script is not the language and script preferred by the agency, the preferred name […] should be".. *should* could be substituted by *may*, given thus the chance of choosing original script or language, as ICP mandates (6.2)

0.4.3.6 Attribution principle, sentence "irrespective of whether the attribution of responsibility is accurate" is very dangerous. It is not clear what are we speaking about here, ¿about description? Then is al right, but if we are speaking on relationships between the resource and the entities (with access point) then is dangerous and misleading.

0.6.2 SECTION 1: RECORDING ATTIBUTES OF MANIFESTATION AND ITEM, does not include place of publication, that is one of the attributes of FRBR for manifestations.

It would be good some recommendation on preference of recording attributes of manifestations than those of items, as it is said in ICP, and also recommended in ISBD and IME ICC.

Edition statement of responsibility is not included. We had the impression that JSC had changed the mind. See examples in p.15 of 19.2.1.3

Place of publication is not included, and it is one of the attributes of FRBR for manifestations.

0.6.2 It should be clarify that the title of series and subseries and the numbering of series or subseries is core when the whole resource belong to the same series, subseries and numbering. It would be more consistent taking in consideration instructions given in 2.12.1.5, 2.20.10.3, 2.20.10.5.2

It seems weird not to see any kind of note as core for any type of resource.
The first sentence of the instruction is "When recording data identifying and describing a manifestation or item, include as a minimum all…" it is strange not to see any core element related to "obtain" the resource

0.6.3 it seems weird not to see "language" recorded between the minimum or core elements for expressions, but as additional identifying elements.

0.6.4 Seems to be inconsistent with 0.3.3, in this last one "place" is included, but in 0.6.4 not.

0.6.5 is not very clear in the sentence "if more than one work is embodied in the manifestation, only the predominant or first-named work manifested is required" it seems very scarce, it was better the "three" rule.

0.6.8 (same as 24.3) seems to be inconsistent with 0.6.5, in this last one instruction is speaking about minimum elements to be recorded on primary relationships, but in 0.6.8 (and 24.3) says that "The recording of relationships between works, expressions, manifestations, and items is not required." In addition "earlier and variant titles" are "core elements" for a serial. What is referring the instruction to?

0.8 Allow many options and alternatives for the cataloguing centre without establishing and order of preference.

0.9 The mention of AACR for punctuation in examples, is to be "understandable?, or are both codes to be used? The same happens with ISBD, if RDA does not want to use it, which other clear solution could present to avoid say "However, ISBD prescribed punctuation is shown in examples illustrating elements that provide a structured description of a related resource." It is not clear the role of ISBD in RDA except to help in understanding the examples.

0.10.1 We doubt about the affirmation "RDA is designed for use in an international context", in 0.2 is recognized the Anglo-American tradition, and RDA does not follow and international structured language.

Errors:
Different type and size of letter, specifically in 0.3.2 and 0.3.1.

Chapter 1

In general is a good summary of what is going to be seen in chapter 2-4, but it is unbalanced some rules are extensively treated and others very scarcely.

1.3 minimum element "Statement of responsibility relating to title (only statement of responsibility relating to the title proper is required; if more than one, only the first recorded is required)" More clarification is needed.

1.6.1.1 We don't know if we do not understand the rule or it is an error in the reference to 2.14. Never a change in mode of issuance (Frecuency is in 2.14) has make to crate a new description. Is it what is intended with this instruction? The same happens in 1.6.2.1

1.6.1.2 Change in media type of a multipart monograph. If the rule prescribe that one multipart monograph in course of publication change of media type in some of its parts, then a new description must be created, we disagree with the rule. But the rule is not clear. We think it would be inconsistent with 3.2.1 alternative "If the resource being described consist of more than one media type, record…". Or is the rule referring to the change of media affecting the whole multipart monograph? This must be clarified.

1.6.2.1 same comment as in 1.6.1.1, could be an error in the reference, or the rule not to be clear.

1.8.2 It seems to be missing the explanation of the last example.

1.9. Is too large, year, decade, century could be merged.

Errors:
    1.5.2 reference to 3.1.3 is erroneous

Chapter 2

As general comment, this chapter is insufficient in theory and exemplification. There are important differences between the types of resources that affect to the description of titles and statements, but there is not guideline. It seems an schema without develop. In addition there is much examples on new supports compared with printed resources, remaining these last ones as not precise. About the sources of information is too general and there is too liberty to chose them.

2.0 It is not clear, specially the third paragraph: "If those elements are not sufficient to differentiate the resource from others bearing similar identifying information, include additional elements from this chapter or from chapter 3 (Describing Carriers) and/or 4 Providing Acquisition and Access Information), as necessary." It should be better to add here the core elements of chapter 3, even better if it would be included in this chapter 2 the whole chapter 3, as we are identifying manifestations and items, and the carrier is a form of identification.

2.2. as general comment: is not clear, there should be more structure, it seems include different types of media but the different sources of information are not cited, are remote electronic resources included? In addition there is inconsistency in the treatment of container and accompanying material sometimes as part of the resource itself and sometimes not.

2.2.4 Other type of resource
A container should have preference over accompanying material. Given that accompanying material is an entity not autonomously used, but separated, that is, with a relationship complementary to the main work, which can present sources of information related to the content of the accompanying material, not to the main resource; whereas container is integral part of the resource itself at a higher level.

2.3.1 Being a chapter about titles, examples in pages 14 and 17 provide subtitles.

2.3.2.9 RESOURCE LACKING A COLLECTIVE TITLE

Examples provide no help on how or where to record or sort out the individual titles. Due to the lack of punctuation, these examples convey more confusion than help. It would be of more help just the guidelines provided, offering no examples. This comment is valid for elsewhere in the whole chapter 2, when information are to be recorded, but neither the instructions nor the examples illustrates how or where this data elements are sorted or/and recorded. (2.3.2.11, 2.3.2.11.2, 2.3.4.7.1, etc.)

2.3.2.11.1 MULTIPART MONOGRAPH
There is no reference to 2.20 of notes, when here there are mentioned the variant titles

2.3.4.7.1 and 2.3.5.4.1 It should be added, as in 2.3.4.7.2, "and the addition or change is considered to be important for identification or access".

2.3.6.3 There is no title variation in example number 2 "The world of television"

2.3.7 and 2.3.8 should clarify they are referring to variant titles that implying or not new descriptions

2.3.8.4.1 MULTIPART MONOGRAPH and 2.3.8 LATER VARIANT TITLE provides contradictory provisions, as in the first rule, changes in title proper are recorded if considered important, and in the second, later variant titles are considered as core. Throughout this chapter, no instructions are provided on where to record certain information (that of title changes, for instance). That only becomes evident when reading 2.20 NOTES, where examples show what kind of information is recorded here. In some cases (as in 2.20.2.4), it is clearly indicated that the information is recorded as a note, but neither 2.3.2.11.1, nor 2.3.8.4.1, nor 2.3.4.7.1, for example, redirect to 2.20.

2.4.1.5 By ceasing to use et. al., and using instead an equivalent word in local language, it's better for local users, but makes information sharing between libraries more difficult. English, French or Spanish can be languages commonly understood, but it's not the case of others. The same goes for the edition conventions S.l, S.n, s.a. The option of summarize the situations that there is more than one as [and six others], it is not a good solution, and it does not serve for identification, or economy, and of course not for international purposes.

2.4.1.6 MORE THAN ONE STATEMENT OF RESPONSABILITY
In general, information about how different elements are related are not clear enough, as nothing is said about how to describe several parallel titles with several parallel subtitles, with several parallel statement responsibilities. If those elements are not related between them, the examples are confusing and shallow. Also applicable for 2.3.3

2.5.3.3 Last example is not clear without ISBD punctuation.

2.5.6 DESIGNATION OF A NAMED REVISION OF AN EDITION
The concept is good as enlarges the explanation given in ISBD or AACR2, but it is ruined when not prescription on how to record and relate the information on edition and revision is given.

2.12.16 ISSN OF SUBSERIES
Last example is inconsistent with 2.12.16.3 text or must be an error.

2.3.2.1 TITLE PROPER.
Definition of title proper is far too simple, and lacks the depth necessary to deal with the peculiarities of the different kinds of resources. The addition in parenthesis is not of any help, even it seems to confuse with the uniform title, mixing the title proper for a manifestation with the title used for citing, the name of a work. This problem is because it is not used the FRBR entity for which the element is applied, instead is used "resource" as ambiguous term.

2.3.3. Says when information is to be recorded, but neither the instructions nor the examples illustrate how or where these data elements are sorted or/and recorded: "Record parallel other title information in the same order as the parallels titles to which the information corresponds". The same happens with 2.3.4 and 2.3.5, and 2.4.3.3

2.3.11. DEVISED TITLE. More explanations on how to construct devised titles for resources others than music, cartographic materials and moving images would be desirable.

2.4.3.3. see comment under 2.3.3.

2.5.1.2, 2.3.1.2, etc. Both lists could be merged.

2.5.2.4 The example does not abbreviate the word "edition" as in others examples of

2.5.2. It is not clear if these designations are going to be abbreviated or not.

2.5.6 It is not clear throughout this chapter if it means reprinted or revised editions, or additional edition statements

2.8.1.4 Optional omission makes possible to eliminate levels in corporate hierarchy, but no explanation is given about which levels can be omitted. Some examples would be of help.

2.8.1.5.1 Would not be better use the word "note" than annotation?

2.8.2.4 No information is provided about how many place of publication can be recorded and how recording.

2.8.4.3 The rule does not say anything about not to give the "editorial" term, byt the examples show without it.

2.8.4.5. Does not give provisions on how may to give.

2.8.6.3 Seems to be in contradiction in relation to 2.8.6.4, where more freedom for transcribing is granted. Thus, it should be given the possibility, in 2.8.6.3 to record the correct date along with the wrong or fictitious. It seems to be imbalanced in the many examples provided on transcribing the date information with respect the examples on other data elements.

2.9.2 It is not clear enough, in the examples on place of distribution, the use of the square brackets.

2.9.6.3 Does not provide instructions on how to record distribution date.

2.12 Provisions are not given about how to place or sort the series data elements, or what to do with them.

2.13 Mode of issuance, World be better in the beginning of the chapter

2.15.1.1 Official and international numbers (ISBN, URN…), should not be equivalent to other local numbers (provided by governments, publishers…), regarding to their use as identifiers.

2.17, 2.18 and 2.19 should say is only on information of item.

2.20 The stipulations on notes are too general, they can come from any kind of source of information and there is no provision on how to make them. There is no balance in the notes treatment as it seems to be plenty on continuing resources, multipart monographs and integrating resource respect other kind. But in the other hand in 2.30 some notes are missed, as for instance content notes, notes on ISSN, or bibliographic history in serials. Is it because they are contemplated in relationships between manifestations? If so is disorienting.

2.20.3.4 Should specify that is for names that are not going to have access point or the contrary this information should be given in authority records, and not in this chapter.

Errors:
Page 23, the rule 2.3.2.10 comes after 2.3.2.5, and 2.3.2.6 does not exist.
2.9.4.7 First paragraph is repeated as first sentence of the 2nd paragraph.
2.10.2.7 Reference is wrong, it should be to 2.10.2.5
2.20.12.2 Misspelling in the title "nformation"

Chapter 3

General comment: the chapter specify the elements that can be recorded, but not the order or the punctuation to be used except some elements separated by comma or using "on" or "in", and should be information concerning one same element, which is not clear.

3.1.1 The wording using "or" seams to present different alternatives. The accompanying material and container are also part of the resource itself, if we are speaking on the manifestation; which is not always clear in RDA.RDA uses always the term "resource", and it is not understandable when is referring to item or to manifestation.

3.1.4, The 3rd paragraph is not clear and the reference is not to accompanying material, is to related manifestations. Is this the intention? If so, we don't agree with it. In addition the first example is not clear.

3.1.6.1 and 3.1.6.2, first paragraph should be moved to 3.2 as they refer to a media type, not to a carrier type, or change the title of 3.1.6 "Change in the Carrier Characteristics" by "Change in the **Media** Characteristics" or "Change in the **Media type/Carrier type** Characteristics"

3.2 Media Type. It would be better to use the term "electronic" than computer, as in the other designations it has not been used the name of the device to access the resource. We miss the term "multimedia" very useful.

3.3.1.2 Recording Carrier Type… "Record the type of carrier used to convey the content of the resource…" It seems to be an error; it should be "to convey the format of the resource". If it is not an error then is not consistent with 3.3.1 Scope.

3.4.1.6. It is not clear what RDA refer to with "identical content". Is it, for instance to the cartographical content? Or is it referring to all the items of the same manifestation? By the way, it is not consistent to make reference to the content when it is bean treated the description of physical characteristics. Here it is mixing description with inventory.

3.4.1.7 In general, we agree with, and the solution taken in 3.4.1.7.4 is brave. But the example in p.19: 3 microfiche (1 score (118 pages) should be treated differently according 3.4.3 if the resource is presented, what shows the inconsistency with 3.4.2.3, 3.4.2.5, 3.4.3 and 3.4.5. In general is not consistent with the logic of giving first the physical support, then the specific content, with which it would reached more integration and less specific stipulations.

3.4.1.11.1 It seems not to be suitable to use the term "item" in RDA when they are not referring to the same FRBR concept as exemplar of a manifestation. In this rule the meaning the meaning is different, as shows the last example 3 volumes (183 items). In general this rule seems to be no specific, so it does not serves for selection and identification objects; it seems more to be with management of local space and no with the resource description. In addition, this information should not be given here, it is more appropriate in relationship with 3.21 on characteristic of items.
Here again the same comment, how would be the display of the information? 123 items 10 m 400 postcards We can not give our opinion as we can't know if it is consistent and clear or not the order because of that.

3.4.5.8 Shows different forms of expressing pag. var., a cataloguing code should normalize it.

3.4.5.22, Same comment as in 3.4.1.6, we think here the sock of the library it is being referred so it is an inventory.

3.5. In general, it is much detailed compared with the rest of description, and some rules seems to be unnecessary.

3.14 Polarity, according the scope seems to refer to reproductions, so it should be with 3.10, or the contrary use another expression as "represented" instead of reproduced.

3.16.3 The repetition of recording in the title is not clear, and a definition should not include the term defined.

3.19.5 File size – if it is the extension why is not in 3.4? The difference between digital resources and not digital continues, which not demonstrate much integration. It should be convenient to use Scope in each stipulation specifying for which kina of resources are.

3.20 Equipment and System Requirements, Seems to be an element not a note, but the most important is that here is not a core, in spite of that the information is fundamental for the user access.

3.21 In this stipulation should be included the information of 3.4.1.11

Errors:
3.4.3 misspelling "listunder"
3.7.2.1 misspelling in "Emulsion on m icrofilm and microficheis …"
3.10.1.1 misspelling "generationis"
3.16.4.1; 3.16.5.1; 3.16.6.1; 3.16.7.1; 3.16.8.1 after Scope the name of the element should be in bold and in the rest of the publication.
3.19.2.1 after the name of the element "is" is missing.

Chapter 4

General comment: It is not being said where to record this information, and it is not fixed the number of URLs to be recorded, or there is not given guideline on it

Chapter 5

5.4 4Language and Script, first paragraph is inconsistent with 5.2 Representation.

5.7.1.2 Has no sense as is the library who establishes the state of identification.

Errors detected:
5.1.4 errata "andvariant", "pointare"
5.3 "l isted"
5.5 "expressin"
5.9.1 "a Cataloguer's note" should be in bold.

Chapter 6

General comment: this chapter has the same rules as in AACR2 representing the Anglo-American tradition, although because the structure and widespread related information we can not be sure or realizing if there has been a change.
The structure of this chapter is rather inconvenient to make out a general idea on how to construct an access point representing a work or an expression. Only when reading 6.27 becomes clearer how to piece together all the elements of information described before. (Example, to find out how to construct a complete preferred title for a legal work, it is necessary to look out many different chapters, the same for treaties). Also, chapters closely related are too far one from another (e. g., 6.28 from 6.15-19, both related to music) To avoid this confusion, it is recommended either to rearrange the order of the chapters, or to provide an introduction broader than 6.1.2 that serve as route map to all

the chapter 6, or to include useful references to chapter 6.27 from those elements susceptible of be part of a work's preferred title.

The examples would be of more help if they are provided with the adequate context so that they can be properly understood. (For instance, examples on 6.24, 6.20.4.3)

6.12.1.4 As an alternative guideline, the use of Polyglot for works in many languages should be given.

6.1.3.1 The meaning and purpose of this rule is not clear. Rewriting would be desirable.

6.2.1.2 This rule says the title can be taken from any source. That goes against the principle of representation (5.2) and against 6.2.2.2, which 6.2.1.2 refers.

6.2.2.4, p. 11, 1st paragraph. If the title is settled from the first resource received by the cataloguing library, as this rule mandates, it would lead to different uniform titles depending of each library.

6.3 and 6.4 deal with core additions to the title, "required when needed". But no provisions are given about how many of these elements must be added, or their order. In addition reading 6.6.1 seems that effectively it should be given all.

6.9. This chapter would be better placed after 6.3, as the identifier is core and minimum along with preferred title. Besides that, it seems weird that a local library control number can be taken as an identifier for a work.

6.10 This list should be more large and comprehensive. Some of the elements refers to thematic content (cartography, music), and other to medium of expression (words, still image). There is not balance in the treatment of the content, music and cartographic much developed. Some elements are broadly developed (Dataset), while others not at all (printed statistics). In addition it would be recommendable that the FRBR terminology "Content Form" would be used instead of "Content Type".

6.14 It is not clear enough if the identifier can be a part of the uniform title of author-uniform title. Again the same comment as in 6.9 about the local control number as identifier.

6.21 Date of work is applying in general or only to legal Works? Because of numbering it seems it is the last case, but should be clear if "legal work" is included in the title.

6.22 Signatory to a treaty, etc. Is being said that is required when needed for differentiation, it is not clear, and this rule should be taken into account together with 5.1.4 or 5.5, and even is not enough clear.

6.23.2.5 Ambiguous wording: "Choose as the preferred title for a sacred scripture the title by which it is most commonly identified in reference sources in the language preferred by the agency creating the data that deal with the religious group or groups to which the scripture belongs" It seems to mean the agency is related to a religious group.

6.23.2.8 Although we recognize is the same as in AACR2, we think it is in contradiction with 6.25.2.5

6.24 Expression date. The examples are confusing, as they include the publication date, which corresponds to a manifestation, it should be explained that the manifestation embodies the only expression of the work, or something like that.

6.25.1.4 First paragraph and note are hard to understand, due to terminological ambiguity. "43Here, *version* is used in its narrow sense of a translation. The version from which another version is made is ignored so far as access points and references are concerned."

6.27 The chapter's title (Title of an official communication) does not convey the meaning of its actual content, as it only deals with religious communications. For other communications, it is given a link (to 6.2.2.1.2), that leads to nowhere.

6.25.2.5 Pope communications are recorded in Latin, but liturgical Works (officially approved by the Holy See), goes in English, incurring in a contradiction.

6.27 already commented, should not be here in the structure of the whole chapter.

Errors detected:
6.2.1.1 check space between words.
6.2.2.10 need to insert "than" in "or more two"
6.2.2.11.2 the last sentence make a reference to 6.2.2.16 that does not exist.
6.2.2.11.3 the references to 6.2.1.14 and 15 are wrong as they do not exist.
6.8.1.3 different type of letter in examples 1 and 2
6.15.1.3 the order of words in "of musical a work"
6.15.2.8 check the reference that does not exist.
6.20.2.5 - .8 check the references that do not exist.
6.20.4.1.4 check the reference that does not exist.
6.20.5.3 check the reference notes
6.23.3.3., 3rd paragraph "workhas", "differenttransliteration", "preferredtitle"
6.26.2.3 the second and last reference does not exist.
6.27.1.3 "representignthe"

Chapter 7

General comment: It is confusing to be treated here again the "Content type" when 6.10 is dealing with it. It would be recommendable to have all the related information gathered in one place.

It is weird to see here the 7.8 System of organization, more related with item and the stocks of the library, as it is for materials in an archival resource or a collection, when the entire section 2 is devoted to attributes of work and expression.

7.13.4 Form of Tactile Notation does not seems a Work or Expression attribute

7.17 – Colour Content seems to be more a manifestation attribute, as it is said in FRBR.

Errors: 7.25.1.3 en Alternative "byapproximately"

7.25.1.5 check space before the last sentence

Chapter 8

8.2 Representation does not abide by International Cataloguing Principles (ICP) 6.3.2.1, where the acceptance of an authorized point of access in the language of the agency creating the data occurs only when the original language or script is not normally used in the catalogue. This deviation from ICP is repeated again in 8.4.

8.12, seems to be very similar to 29.6 and

8.13 to be repeatable with 29.7.

Chapter 9

The structure does this chapter hard to work with. The organization and numbering sequence makes it unclear.
References should be included leading to 9.19, where is finally explained how to construct an access point for a person. It would be of help is chapters dedicated to choice of name, entry element, additions and relevant information should be put in separate hierarchy or placed together.

Contradiction between examples and rules: rule 9.2.2.9.6 mandates not to add Saint to names of persons canonized with a surname (example given: More, Thomas), but 9.19.1.1, which deals with additions, provides the example More, Thomas, Saint.

9.2.2.5.4 SPELLING, says that, if variant spellings of a person's name are found, choose the form found in the first resource received. This rule is not consonant with the rest of 9.2.2.5, where the predominant form is chosen

9.2.2.8 Individuals with more than one identity does not present, at least as alternative, the possibility of choice of one name when this has become a conventional name, for example in old authors not contemporary. If this alternative is available, we don't find it where it would be supposed to be.

9.2.2.9.5 WORDS INDICATING RELATIONSHIP FOLLOWING SURNAMES now are included always. It would be better to recommend that these additions (Sr, Jr, fils.) be used when they are commonly used in sources.

9.2.2.9.6 It is not clearly explained or it is hard to understand why the addition Saint is excluded as an addition in some cases: popes, royalty…, even it is difficult to understand in 9.2.2.9.6 as here could serve as identification.

9.3 – 9.6 Examples of additions to names are confusing, as they do not contextualize the additions by putting the name to which they are added.

9.3. Latin ca. is more international than approximately or equivalent in other language.

9.12.1.1 Data concerning address of the persons, e-mail, could violate privacy laws.

9.18.1.1 It is not easily understandable that a local library identifier might be used as an international identifier for a person.

Errors: in 9.3.11 the name of the term should be in bold to be uniform with the rest of RDA. This is a general comment as it happens repeatedly: 9.3.2.1 – 9.3.4.1, 7.7.1.1-9.12.1.1, 9.13.1 – 9.18.1.1

Chapter 10

10.2.2.24, note: "Who is who"- is cited as authoritative sources of information but are not cited national bibliographies and national authority files?

10.9 Identifier: a local library number can not be an identifier, because it is not international. It is only valid for that specific library purposes.

Chapter 11

Exceptions gathered after 11.2.2.5.4 are not really exceptions, but special cases, and they should be named and organized like that. Treated as exceptions, as they are now in the draft, is confusing; moreover, it is not clear if they are exceptions to 11.2.2.5.4 or to rules on variant names 11.2.2.5.1 – 11.2.2.5.4.

11.2.2.5.2 The freedom of choice of the language, giving always the possibility of choosing the name in the language of preference of each agency, goes against ICP, unless it is added a phrase only allowing this possibility if the original language and script is not commonly known by the agency and theirs users, or something like that.

The use of religious jurisdictions is contradictory in Eastern Church (11.2.2.5.4 Exceptions, where they are entry element) and other religions (11.2.2.30.1, where they are not) Could be harmonized and always be used jurisdictions as an entry element? Religious jurisdictions are officially approved and published; in addition the access point will gain in specificity and simplicity.

11.2.2.11 We agree with the regulation, but we think the year of celebration of a conference, etc., if it is considered integral part of the name, then it should be better to include it, as it happens with other terms in 11.2.2.10. It would be solved if it is added one sentence similar to 11.2.2.10: "unless the word or phrase is an integral part of the name"

11.2.2.12 Transliteration. Alternative guideline should be the general rule, as it is easier and accurate to take the transliterated form appearing in resources associated with the entity, than always transliterate the name by the cataloguing agency.

11.2.2.21.1, 11.2.2.21.2, 11.2.2.21.3, 11.2.2.21.4,11.2.2.22.4 and 11.2.2.24 provide guidelines on punctuation what is strange when never in RDA has been done; in the other hand it seems not to be the better places as here is being speaking on preferred names, maybe these guidelines should be better in constructing access point in 11.12

11.2.2.24.2, only in cases of Military courts the parenthesis information seems to be different ordered to the rest of access point for other trials. Which is the logic?

11.2.2.25.1 Two similar examples: *Australian Army Psychology Corps*, and *South African Army Service Corps*, are given two different solutions: *Australia. Australian Army Psychology Corps*, and *South Africa. Army. Service Corps*, therefore resulting confusing.

11.2.2.29.1 Religious officials are accepted in the agency's language, unlike those of governments, etc. (11.2.2.21). We realize is the same as in AACR2, but is not this contradictory?

11.2.2.30 the title is confusing, it is necessary to add "for religious bodies" in the title, it could be confused with 11.2.2.14 or 11.2.2.19. The whole rule shows the different criteria depending of the Church (see 11.2.2.5.4)

11.11 Identifier: a local library number can not be an identifier, because it is not international. It is only valid for that specific library purposes.

11.12 The same comment as in chapter 6 and 9. The structure of this chapter is rather inconvenient to make out a general idea on how to construct an access point, it is necessary to look out many different rules. Instructions closely related are too far one from another. To avoid this confusion, it is recommended either to rearrange the order of the chapters. For example this rule repeat what has been said abbreviated before, but here in 11.12.1.3 are dealt radio and television that has not been mentioned before.

11.5 and 11.12.1.4 Relationship, application and differences between both rules are not clear. Should not they be merged or at least cross-linked?

Errors:
11.2.1.1. name of corporate body before definition should be in bold
11.2.2.5, 3rd paragraph, "ispresented", "commonlyfound", "otherswith" should be separated.
11.2.2.5.4 Exceptions: different type of letter of the title Authocepahlous, Patriarchates, Archidioceses, etc. This situation happens many times in RDA, we recommend to check.
11.2.2.13 Exceptions, the numbers referred are missing
11.2.2.14 Type 6 the one before the last example is not clear, and less if you compare it with the 2nd example in 11.2.2.14. The exceptions are not clear, and the first rule referred (see 11.2.2.18) should be 11.2.2.19.
11.2.2.16 first reference does not exist
11.2.2.18 first reference is not correct.
11.2.2.20 the reference should be 11.2.2.19.
11.2.2.21 error 5th paragraph two words joined
11.2.2.30.1 two words joined
11.2.3 1st paragraph repeat the paragraph under Scope.
11.2.1.2 "associated"
11.7.1.2 "corporatebody"

Chapter 16

The usual addition of the larger place in which is located make access point construction more complicate an costly.

16.2.2.9 Uses the denomination USSR or Yugoslavia, currently inapplicable. Should be clarified?

16.2.2.5 Transliteration. Same comment as in 11.2.2.12. In order to be more cost-effective, forms already transliterated appearing in resources associated with the entity should come first as an option instead of transliteration always by the agency.

Errors
16.2.2.6 2nd paragraph "govemnent"
16.2.2.8.1 the beginning of the paragraph is missing, so it is not understandable.
16.2.2.9.2 the last reference number does not exist.

Chapter 17

17.4.2.1 A local library control number can not be an identifier.

17.4.2.3 "Composite descriptions" is a new term that would need more explanation

17.8 By only describing the first work/expression it becomes impossible identifying uniquely a given manifestation

Chapter 17 could be merged with chapter 24.

Errors
17.1.1. "meaningspecified"

Chapter 18

18.6 Examples would be welcomed, here and in the instructions referred, in order to understand exactly what kind of notes may be recorded here.

18.4.1.1 Same comment on identifiers: A local library control number can not be an identifier

Errors
18.4.2.2 The reference should be to 1.6

Chapter 19

In order to be clarifier the examples in 19.2 should be complete. The examples should show the designators in order to be understandable.

19.1.2: 2nd paragraph is not clear and seems inconsistent with the new and genera rule of RDA that only the first author or creator is core; and inconsistent with 0.6.5: "Work

manifested (if more than one work is embodied in the manifestation, only the predominant or first-named work manifested is required) Expression manifested (if more than one expression is embodied in the manifestation, only the predominant or first-named expression manifested is required)"

19.2.1.1. 3rd paragraph is difficult to understand.

19.3, 19.3.2 and 19.3.3 core element wording is not clear.

Errors:
This chapter present so many errors that are not possible to detail.

Chapter 20

20.2 It seems too open to make as many access points as the cataloguer wishes without instruction to guide them in having good criteria. It is not cost effective having in mind that all access point should have authority control.

Chapter 21

21.12 mandate to follow 21.2-21.4 which are not clear guidelines

Chapters 24-27

17.1.3 and 24.1.4 definitions of preferred access point are different, they should be the same. We prefer the definition 24.1.4, adding "if appropriate" alter "responsible of the work".

24.3 (same as 0.6.8) says that "The recording of relationships between works, expressions, manifestations, and items is not required." This mean that many access points from AACR2 and notes that in ISBD are mandatory, in RDA are optional.

24.6 is not clear in spite of its definition and examples because they are not contextualized, it is not in a structure; where is supposed to be this information? This rule isolated seems not to be useful out of context.

Chapters 25-27 seems to be the more confusing, especially if taking into account aggregates, and whole/part relationships, which are very clear in FRBR but we do not understand or see in RDA. This can be seen in appendix D when mapping RDA to MARC 21 the 505 has only the counterpart with 25.1, and should be also 26.1, and 27.1 We have the general impression that RDA has made an effort to apply the theory of FRBR but has remained in the middle of theory and practice, and we expect from a code of rules more guidelines on the practice.

Chapter 27-28 we miss the Explanation of relationship that is in other chapters. Examples without explanation do not give the idea where the information should be recorded, eve if this information is going to be recorded in such a way. For example in p. 3 of Chapter 27 "Ka mau te wehi!" with 4 contains with only the ISBN, is not clear.

Chapters 29-32

29.2 Should not be added in the last paragraph that the relationships with persons, families, corporate bodies are represented by preferred access points and notes?

29.3 We disagree when RDA says that recording relationships is not required. Relationships are fundamental in FRBR.

29.4.1 Same comment on identifiers: a local library number can not be an identifier.

If RDA is going to work by linking information, what is the sense of repetition of 29.6 that is the same as 8.12, or 29.7 that is the same as 8.13

In general chapters 30-32 do not seem to add important information that could be simplified.

Appendixes

Appendix D
To present the whole ISBD and the MARC 21 in so few pages does not contribute to clarify, even the opposite. If at least it would be recommended that National Bibliographic Agencies records contain all the ISBD mandatory elements, could mitigate the clear fact that RDA does not adapt to ISBD.

Appendix K
Collective pseudonyms relationships are not contemplated.
There is not counterpart to the relationship from group members to the group that exist.

Appendix M
From this Appendix M we realize that RDA display is the labelled display of an usual local OPAC. It could be easier for a local cataloguer than MARC or ISBD display, but it is not useful for international exchange. To avoid this was the reason why ISBD and MARC format was created, to make everyone cataloguer could understand the record without the local language knowledge.

In the 5JSC/RDA/Full draft, p. 7 document is being said that for the representation it has been used MARC encoding, but in its 3rd point says that not all elements of RDA can be encoded in MARC 21. This can be confirmed checking Appendix M, so then we deduce RDA can not be fully applied and it would be necessary to wait until the MARC format is adapted.