To: Joint Steering Committee for Development of RDA

From: Margaret Stewart, Chair, JSC

Subject: RDA: Resource Description and Access – Full Draft – Review by the
Office for Library Standards of the German National Library and the
expert groups of the Committee for Library Standards

These are comments on the full draft of RDA received from the Office for Library
Standards of the German National Library in collaboration with the expert groups of the
Committee for Library Standards.

Office for Library Standards
February 2nd, 2009

**Comments on „RDA – Resource Description and Access" –
Constituency Review of November 2008 Full Draft**

To: Joint Steering Committee for Revision of RDA

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The full draft of "RDA – Resource Description and Access" was made available by the Joint Steering Committee in November 2008 (http://www.rdaonline.org/constituencyreview). The JSC invited to comment the draft by February 2nd, 2009.

We appreciate the opportunity to comment on the full draft of RDA. The Office for Library Standards of the German National Library in collaboration with the expert groups of the Committee for Library Standards herewith submits its statement on the new standard. Please note that those issues we consider a priority for discussion by the JSC are marked with an asterisk.

On behalf of the German National Library and the Office for Library Standards, we would like to express our sincere gratitude for the JSC's development of the RDA draft and professional management of the revision process. We have high regard for the potential of the principles of RDA to define and improve library users' information-seeking experiences. As you know, interoperability in cataloguing is a matter of greatest importance to us. We hope that the attached observations are helpful to you and support the international nature of RDA.

GENERAL COMMENTS ON RDA AS A WHOLE

Objectives and Principles

* Consistency

We found quite a number of inconsistencies in the draft. The JSC should check the consistency of all introductory chapters. Moreover, we noticed that often the references to specific paragraphs are not correct.

* Clarity

As the wording often is abstract and too general, the rules are partly difficult to understand or not intelligible at all. This seems to be hindering for the transfer into the cataloguing systems. Moreover, the examples are taken out of context illustrating only one aspect, and thus are difficult to relate to the other elements. The examples should include the form as it appears in the resource as well as the form of the entry. The mixture of "Description" and "Access point control" within the same chapter (mostly within Section 2) makes it even more difficult to understand the code.

* Currency

In some places, in our view, the new draft does not seriously enough take into account current developments such as search and search scope capabilities. We would like to see the potential of persistent identifiers to name, identify, and persistently link objects (the upcoming technique for searching and navigating the web) integrated into the standard. RDA must be compatible with semantic web standards.

* Compatibility

RDA should be in harmony with its underlying principles ISBD Consolidated, Statement of International Cataloguing Principles, FRBR, and related standards. At this point in time, the draft does not comply with this objective throughout the rules.

Non-redundancy

Many repetitions of definitions and wordings (e.g. Work, Access point, etc.) are not necessary and make the code too voluminous and clumsy to use.

* Terminology

The terminology is not used in a consistent manner (e.g. the term "resource" in 1.1.2 is defined differently from 18.1.3.). The paper "scope and structure" defines a resource as „an identifiable information object. The object may either be tangible or intangible in nature."

Compliance to the Semantic Web

At present there are several attempts to create ontologies for bibliographic data but all of them come from outside the library community. At the conceptual level, RDA is a step in the right direction but without a connection to the Semantic Web it will be irrelevant outside the library world. A representation of the core RDA concepts in RDF is urgently needed. At least, the JSC should define official URIs for the key concepts of RDA.

* Authority files as main source for names and titles

We would appreciate it if the authority files were accepted as the main sources of information for names, titles, and concept terms. We refer to our former comments on RDA, Sect. 2-4 and 9, General issues. By re-using and building on already established access points, the consistency within and between authority files, catalogues, and networks is guaranteed across national and community borders, and cataloguing work can be shared and distributed.

The catalogue

What is missing in RDA is a statement saying that a catalogue is a not a static tool. Therefore, we recommend that principles be provided on how a catalogue should be developed in the future.

We would like to encourage the JSC to concentrate intensively on electronic catalogues, the web environment and future developments.

* Modifications in names and titles

The German National Library would appreciate as a key rule that names (including titles) shall not be modified in spelling, punctuation, spacing, completeness (including initial articles), or its natural order, but that the name shall be recorded in the form as given in the respective source of information. Modified forms may be recorded additionally as variant forms of the name, if needed. We agree that layout-based variations should be normalized.

Some of the German expert groups, however, feel the need to follow those rules for spelling, punctuation, etc., and want to record the information as it is found in the resource only as variant forms.

* Original form of name vs. form preferred by the agency (also 0.10.2)

RDA is designed for an international context (0.10.1), and concurrently to serve the users in their national and cultural contexts (responsiveness to user needs, Objectives and Principles, October, 10, 2008 draft). This leads to an antinomy between either choosing the preferred name in the original language and script, reflecting internationalization, or choosing the preferred name in the language and script preferred by the own agency, reflecting the usability in the own cultural context. Both forms of name likewise may not be usual to users outside the respective community. We strongly suggest, wherever possible, recording both, the form of name in the original language and script and the form in the language and script preferred by the agency.

* Numerals

We suggest that numerals be recorded in the form in which they appear in the source of information and as a separate element in Arabic digits by default, thus enabling easy numeric sorting.

FRBR

It would be helpful, if the JSC could provide instructions on how to differentiate between new works and expressions according to FRBR 3.2.1.

Metadata

We welcome the close cooperation of the JSC with the main metadata standard communities like MARC 21, Dublin Core, and ONIX groups. We also welcome the activities regarding a registry for the RDA vocabulary.

As techniques for automatic indexing evolve, we recommend that the new standard should take into account also the philosophy and possibilities of such new methods.

Online tool

We regret that the online-version of RDA is not available to date. We are sure that a publicly available online version in HTML format (human readable) as well as in RDF format (machine readable) are essential prerequisites to connect the new standard RDA with current web applications (semantic web). Without an HTML version and URIs, RDA will not be usable in the web environment.

Inconsistency

Within a cataloguing code offered as an online tool the definitions of the entities, the basic statements on the entities and on their data elements (attributes and relationships) as well as the attributes of the names (language, script, period of activity, etc.) should be given centrally and linked to the single chapters. This would help to avoid inconsistency. In print editions, the parts applying to the particular chapters might be duplicated.

Practical Use

- Please avoid the frequent use of definitions (e.g. manifestation, access point, etc.)

- Those rules mentioned in the introductory and/or general chapters should not be repeated in the single chapters. Otherwise the code will be very voluminous. Especially in the case of a work in the form of an online tool such repetitions can be avoided by hyperlinks to corresponding rules.

- The examples in their current form hinder the practical use. Please see our comments on "Comments on Examples in instruction number order".

- In many cases links from the text of the rules to the appendices are missing.

- In the case of a print publication the numeration of the chapters should be included in the header or footer.

- It seems to us that workflow issues and/or cultural conditions of the Anglo-American community not known by the other library communities are incorporated in the code. To give an example: we do not know what the word "omit" means in Appendix C. Does it mean to leave out the initial article completely, i.e., to not record it, or does it mean to record it but to ignore it for sorting purposes (i.e. in the sense of MARC 21)?

* Editions of RDA

We would like to ask the JSC to consider three editions of RDA: an online edition, a print edition and a teacher's edition. We think that these are strongly desired requirements of the library community. If RDA could meet these needs, it could be a widespread and successful tool.

It would be very helpful for a fast adaptation of the standard, if the JSC provided an official teacher's toolkit, which would lead to a homogenous application of the standard. We also recommend providing RDA lectures on *youtube* or on the RDA website.

SPECIFIC COMMENTS IN INSTRUCTION NUMBER ORDER

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Chapter 3.20.1.3 Recording Equipment and System Requirements is missing.

CHAPTER 0 INTRODUCTION

0.0 Purpose and Scope

According to 0.0, RDA is intended as a cataloguing code to support resource discovery and enable the user to find, identify, select, and obtain resources. But RDA does not clearly define the range of resource discovery. Though stating that RDA is meant for the international context (10.10.1), the rules do not sufficiently reflect resource discovery in a world-wide range. Some of the rules – e.g. the counting-out rules - even seem to focus on the range of smaller catalogues. The impact of authority files in building networks for search and retrieve on the national and international level is completely neglected. In our view, international cataloguing rules have to take into account that the various national forms of names, titles and terms have to be brought together for international resource discovery, and that authority files are crucial for this objective.

User tasks:

As RDA claims to be compatible with internationally established principles, models, and standards the rules should aim at meeting the user tasks "navigate" (or contextualize) and "explore", too. (FRAD and Statement of International Cataloguing Principles defined "navigate" or "contextualize" as user tasks, "explore" shall be defined in FRSAR.)

0.3 Conceptual Models Underlying RDA

0.3.2 Alignment with FRBR

Here, it could be useful to add instructions according to FRBR 3.2.1 that help to decide whether the resource is a new work, or a new expression (e.g. updates and/or translations normally form new expressions but interpretations, parodies or similar are regarded as new works.)

0.4 Objectives and Principles Governing Resource Description and Access

0.4.2 Objectives

0.4.2.1 Responsiveness to User Needs

The objective "find resources that correspond to the user's stated search criteria" implies that not only searches for specific resources or for the resources for which a specific person, corporate body, or family is responsible for shall be met, but also queries for all the elements identifying and describing the bibliographic entities (e.g. a query "find all resources of German economists living in the 19th century").

The objective „find all resources associated with a particular person, family, or corporate body" implies not only that when recording persons, families, and corporate bodies they have to be identified. It also requires that the technical requirements for input and presentation of different scripts have to be met and implies a defined range of discovery (see our comment on 0.0).

The objective "find all resources on a given subject" in its consequence implies the need of subject cataloguing for all resources. This should be reflected in the "core element set".

We would like to see a user task "select" included, to select the person, family, or corporate body that is appropriate to the user requirements from a (sometimes long) list of equal or similar names used for different entities. The additional user task is important because the elements that are best for identification (dates) differ from those that are best for selection (profession, place, affiliation etc.). Whereas users and end users are defined in FRBR, they are not in RDA.

We recommend defining the "user" in Chapter 0 and in the glossary.

0.4.3 Principles

0.4.3.1 Differentiation

The term „resource" appears here for the first time in the code, without being defined. We propose that all the definitions of the bibliographic entities be centrally placed in the introduction chapter, and additionally linked to the glossary.

"Entity" in this context seems to mean persons, families, and corporate bodies, though in other chapters it seems to be used as a generic term, including resources.

What does the sentence "The data describing an entity associated with a resource should differentiate that entity from other identities used by the same entity" mean? According to 8.1.2 "other identities" fall under the definition of persons i.e. are entities on their own, and not used by the same entity.

0.4.3.3 Relationships

Within this paragraph nothing is said about the structure (in depth) of the relationships. It lacks, e.g. instructions for relationships between persons, families, and corporate bodies. We recommend adding explanations here. The paragraph "The data describing an entity associated …" is not intelligible. It should be worded more clearly and precisely.

0.4.3.4 Representation

Guidelines about the source of information, languages and scripts for works can be found in 0.4.3.4, in 5.2 under representation and under 6.2.2.2, 6.2.2.4, and 6.2.2.5. These rules are not consistent.

* Source of information for recording the preferred title of a work

0.4.3.4 is in contradiction to 0.4.3.7 which indicates that if there is a commonly used title of a work in the language and script preferred by the agency, preference should be given to that title (cf. our comment on 0.4.3.7).

By contrast, 0.4.3.4 and 5.2 indicate that the source of information should be taken in order of preference:
1. the title most frequently found in resources embodying the work in its original language,
2. the title as found in reference sources,
3. the title most frequently found in resources embodying the work.

We recommend that authority files first be ranked in the order of preference of sources, preferably those recording in the original language and script of the work, as they already reflect the names and forms of names represented in the resources. We do not want to re-do work which has already be done.

On bullet point 1: Although we understand that on the work level script may be seen as a difficult element, we would like to see an instruction saying that the recording of the preferred title of the

work in the original language and script should be preferred. (Concerning new works, in most cases the title of the first manifestation has to be taken as the title of the work, cf. our comment on 6.2.2.2.). According to the Statement of International Cataloguing Principles, preference shall be given to information found on manifestations of the work expressed in the original language and script (with the alternative to use the language and script best suited to the catalogue). We propose that the international standard be followed.

On bullet point 2: In our opinion, instructions indicating that the title should be taken from reference sources in the language and script of the work are missing.

On bullet point 3: We propose that counting rules be abandoned. In a web environment with world wide searching possibilities, counting-out gets critical: How is "most frequently found in resources embodying the work" to be understood?: found worldwide, countrywide rsp. system wide, or locally?

We strongly suggest that, if ever possible, both, the form of name in the original language and script and the form in the language and script preferred by the agency be recorded.

* Source of information for the preferred name of a person, family or corporate body

0.4.3.4 is in contradiction to 0.4.3.7 which indicates that the name or form of name designated as the preferred name for a person, family, or corporate body should be the name or form of name found in resources associated with that person, family, or corporate body in the original language and script of the content.

By contrast, 0.4.3.4 indicates that the name or form of name designated as the preferred name for a person, family, or corporate body should be the name or form of name most commonly found in resources associated with that person, family, or corporate body, or a well-accepted name or form of name in the language and script preferred by the agency creating the data.

We recommend the consultation of authority files prior to resources, preferably those recording in the language and script common to the person, corporate body or family, as they already reflect the names and forms used by the entities themselves or represented in the resources. We do not want to re-do work which has already be done.

If the person, family, or corporate body sought for cannot be found in the appropriate authority file, that name or form of name should be chosen as the preferred name (in order of preference)
- that is found in resources in the original language and script of the work,
- that is found in reference sources in the original language and script,
- that is found as a well-accepted name or form of name in the language and script preferred by the agency.

We strongly recommend, if ever possible the recording of both the form of name in the original language and script and the form in the language and script preferred by the agency.

* 0.4.3.6 Attribution

Chapter 0.4.3.6 indicates that data on responsibility relationships between the resource and a person, family, or corporate body should be taken from attributions of responsibility in the resource itself or in reference sources "*irrespective of whether the attribution is correct or not*". We suggest not recording the relationship if it is known that the attribution is not correct or making a note in the case of doubt. Misleading relationships might have impact on rights management.
The German National Library, e.g. regards the translation relationship between the authority record for the translator and the translated resource as an indicator for the fact that the person is the owner of the rights for that translation.

We suggest that, wherever possible, preference be given to the name or title in original language and script, alternatively in an appropriate transcription. (We agree to the exceptions made in chapter 6 for works with varying citation forms (cf. our comment on 6.2.2.2)). Nevertheless, in the international context, the forms of names, titles, and terms in the languages and scripts preferred by the particular agencies are needed as well, as they fit to the searching language of the users. The names (titles, terms) or forms of name in different language and script should be labeled adequately so that the users are able to choose their search and presentation language (cf. also our comment on 6.2.2.2).

0.4.3.8 Common Usage or Practice

We propose adopting the wording of the Statement of International Cataloguing Principles in 6.3.4.1: "When the name of a person consists of several words, the choice of first word for the *preferred access point* should follow conventions of the country and language most associated with that person, as found in manifestations or reference sources."

0.4.3.9 Uniformity

In the case of preferred access points based on preferred names or titles, variant names, and variant forms of names including variant spelling forms are the bases for variant access points. A standardization of spelling, capitalization, abbreviations, order of elements, punctuation, etc. is not necessary and even counterproductive.

0.5 Structure

Appendix M is missing on the list.

* 0.6 Core Elements

When looking on the core elements defined in RDA, on the one hand we appreciate the definition of small core sets for describing the attributes and relationships of the single entities. This helps the cataloguer to either make a comprehensive description for the various resources or a less detailed description with only some important elements, depending on the specific needs and the capacities of the library.
On the other hand we would like to draw attention to the fact that cataloguing does not stop with recording the first manifestation of a work or the first work of a new author, particularly when using authority files – it is a task accompanying the whole life cycle of the entities, with the potential for gathering additional information with each further usage of the entity. We would like to use this potential over time and recommend this be regarded in the rules. Additional elements first facilitate the recognition of the entity again when reoccurring in the next resource, and can then be used by the users as additional search criteria, and by and by the information clusters grow together to an information network.

We propose listing of the relationships of the entities in the element sets, too. Many of the attributes (e.g. the attribute "publisher's name") might as well be designed as relationships (and vice versa).

We propose a further differentiation of the core element set according to the type of entities. (E.g. for serials and lose-leaf collections this would be useful because not all elements of the core element set are applicable for those publications, or other elements are regarded as being more important. In the case of dependent works the source information could be core element.)

<u>0.6.1 General</u>

As we understand 0.6.1, the core elements include both, elements that are mandatory in any case and elements that are mandatory if applicable (i.e. mandatory in special cases). We expect that the element list is not conclusive but may be amended. We apologize that our comments on 0.6.2 et seq. cannot be more than first brainstorming.

<u>0.6.2 Section 1: Recording Attributes of Manifestation and Item</u>

There was a strong consensus in the German community to add "Place of publication" as a core element. This would be in consistency with ISBD (4.1.3) where the first place of publication should be recorded.

According to the ISBD "media type" is a core element as well, therefore we recommend adding „media type" (3.2) as a core element. RDA should be consistent with the ISBD.

We would like to see "work manifested" and "expression manifested" included as core elements. „Shelf mark" and „URL" should be included as core elements.
"Identifier for the item" should be included as a core element. The German subject authority file contains numerous records for manuscripts (items).

<u>0.6.3 Section 2: Recording Attributes of Work and Expression</u>

Please consider that the preferred title of a work may, too, be the same or similar to the title of a manifestation and that many titles are inexpressive and need identifying elements to be meaningful.

We prefer to include identifying elements not only to differentiate the entities but also to identify the entity as the one searched for by the user, to enable to select the one searched from identical or similar titles, and to meet additional search criteria.

Taking into account resource discovery in a global context, the language element – if applicable - is absolutely indispensable, even if not needed to differentiate, both on the work and on the expression level.

The element "work expressed", the "creator" element and the "contributor" element is absent from the section.
The "successor" and the "predecessor" element and the "component" and "part" element is absent.
The "subject" element is absent.

<u>0.6.4 Section 3: Recording Attributes of Person, Family, and Corporate Body</u>

We prefer to include identifying elements not only to differentiate the entities but also to identify the entity as the one searched for by the user, to enable the selection of the one searched from identical or similar titles, and to meet additional search criteria.

We would like to point out that recording persons, families, and corporate bodies often means using secondary information from outside the resource in hand. In order to conduct recording in a cost-efficient manner, we create a more flexible core set using first those of a group of preferred elements that can be adopted from the resource or found very easily through the Internet. Dates, for instance, are not always included in the resource and – in the case of dates of persons – sometimes may not be laid open. For selection reasons, the profession element or the affiliation element often fits better than the years.

For persons, the type element should be mandatory in the case of multiple identities, spirits, gods and literary characters, and other fictive persons. The elements "is pseudonym of", "has pseudonym" and "is affiliated to" are missing.

For corporate bodies, the successor and predecessor elements and – in cases of bodies with subordinately recorded names – the element "parent body" are missing. The type element should be mandatory for jurisdictions (they may be used as places, too) and for other ambiguous entities. The records describing ambiguous entities have to include the core elements that are applicable not only for one but for two or more entity types.

0.6.6 Section 6: Recording Relationships to Persons, Families, and Corporate Bodies Associated with a Resource

Manifestation and item are not covered here. We would like to see an access point for "related item"(e.g. for a custodianship relationship, provenience relationship). We would also like to point out that the publisher element might be designed as a relationship to a corporate body.

0.7 Access Points

We would appreciate it if the definitions of "access point", "preferred access point", and "variant access point" would be placed centrally under 0.7, together with the general instructions how to build and use them.

We would like to stress that we do not understand why an identifier used to record relationships (primary relationships, creator relationships etc.) does not fall under the definition of an access point. In the case of relationships, in our view, the identifier stands both for the preferred and variant access points of the entity represented by the identifier.

We are convinced that recording elements (attributes and relationships) as additions to the name will not be useful in the future. (This does not relate to the presentation form). We therefore strongly recommend adjusting the rules and wording throughout section 2 to the general rule that the elements may be recorded either as additions or as separate elements or as both.

0.8 Alternatives and Options

In our view, optional additions are not crucial, in so far as the elements that are added are defined in RDA. Otherwise, the omission of elements that might be sought by users has to be proven case by case.

0.9 Examples

The introductory note to the example „Smith, John, 1832-1911" refers to AACR and not to RDA, Appendix D.

0.10 Internationalization

0.10.2 Language and Script

Will the JSC advise the national agencies with respect to language and script, and/or will they deliver regular updates of the lists of controlled vocabulary of RDA? Or will the list be an integrating resource?

Which „specified elements" are meant in the first sentence of the second paragraph? Where exactly are they defined in the instructions?

Please see our comments on numerals on page 3.

0.10.4 Dates

Which „specified elements" are meant in the first sentence of the second paragraph? Where exactly are they defined in the instructions?

Will the RDA controlled vocabulary provide mappings between the different calendars?

0.10.5 Units of Measurement

Which „specified elements" are meant in the first sentence of the first paragraph? Where exactly are they defined in the instructions?

Will the RDA controlled vocabulary provide mappings between the different measurements?

SECTION 1: RECORDING ATTRIBUTES OF MANIFESTATION AND ITEM

CHAPTER 1 GENERAL GUIDELINES ON RECORDING ATTRIBUTES OF MANIFESTATIONS AND ITEMS

1.2 Functional Objectives and Principles

What exactly is meant by the phrase „common usage". A definition would be helpful here.

1.3 Core Elements

As already noted under 0.6.2 „Place of publication" should be added as a core element.

1.5 Type of Description

1.5.2 Comprehensive Description

We suggest giving the most common case „single volume monograph" be given as the first example under a).

1.6 Changes Requiring a New Description

1.6.2 Serials

The following rule should be added: "1.6.2.5 Change in the edition statement indicating a change in the subject matter". This was also recommended by CONSER and corresponds to ISBD rule 0.2.4.2.2.

1.6.3 Integrating Resources

As already noted in 1.6.2 the following rule should be added: "1.6.2.5 Change in the edition statement indicating a change in the subject matter". This was also recommended by CONSER and corresponds to ISBD rule 0.2.4.3.1.

<u>1.6.3.3 Re-basing of an Integrating Resource</u>

We recommend that this rule be omitted.

1.7 Transcription

<u>1.7.2 Capitalization</u>

Please see comments on Appendix A.

<u>1.7.3 Punctuation</u>

We recommend more precise wording, as different interpretations of this rule are possible. The examples do not make clear whether they reflect the information as found in the resource itself or as it should be recorded. In the latter case the first example should provide a space between the three full stops and the word „and", along the lines of Appendix A, page 7. We recommend providing both, the information as found in the resource itself and as it should be recorded.

<u>1.7.5 Symbols</u>

The insertion of square brackets within a title is no longer necessary in online catalogues but conforms to ISBD. We recommend to add an example for a title like "I ♥ NY". At which FRBR level should the symbol be added?

<u>1.7.6 Spacing of Initials and Acronyms</u>

Please see comments on Appendix C.

<u>1.7.8 Abbreviations</u>

Please see comments on Appendix B.

1.8 Numbers Expressed as Numerals or as Words

Please see our comments on numerals on page 3.

<u>1.8.1 General Guidelines</u>

The term "early printed resources" in the alternative rule is defined in the glossary as "Materials manufactured before the advent of machine printing in approximately 1825-1830". There are techniques of machine printing before 1825. What is the reason for defining this time range?

<u>1.8.5 Ordinal Numbers</u>

We recommend recording ordinal numbers in a language independent form always with a full stop following an ordinal number (e.g. 1., 2.)

1.9 Dates

<u>1.9.2 Supplied Dates</u>

<u>1.9.2.5 Decade Known</u>

1.9.2.5-1.9.2.10
Adding the character „s" to indicate a decade is language dependent, and thus unusual in non-English speaking communities.

1.10 Notes

<u>1.10.2 Capitalization</u>

Why is an alternative given within the notes area that is not mentioned elsewhere? Please see our comments on modifications in names and titles on page 3.

CHAPTER 2 IDENTIFYING MANIFESTATIONS AND ITEMS

Rules for identification and for recording attributes of manifestations and items are mixed up in chapter 2. Thus the chapters 1 and 2 are inhomogeneous. Maybe renaming of the header "Recording and Identifying Manifestations and Items" would clarify the issue. The same applies to sections 2 and 3.

Within the context of the rules terms like „manifestation" and „item" should be used consistently in the sense defined in the glossary. Throughout the full draft many terms are explained repeatedly, partly with varying wordings. The phrase "as used in this chapter" is misleading to the reader.

2.1 Basis for Identification of the Resource

<u>2.1.2 Comprehensive Description</u>

<u>2.1.2.3 Resource Issued in More Than One Part</u>

Although the stipulation to use the first or earliest issue or part as the basis for the description is ISBD-like, we note that the German Serials Union Catalogue (ZDB) uses the newest or latest issue or part for serials for good reasons. The latest information is important for the user, and supports access and accounting and rights management systems.

We suggest giving either an option in the rules to base the description for serials on the newest or latest issue, or providing the possibility to make current information, e.g. on publishers, titles, etc. searchable be given as they are important access points.

2.3 Title

<u>2.3.1 Basic Instructions on Recording Titles</u>

<u>2.3.1.5 Names of Persons, Families, and Corporate Bodies</u>

We cannot find any evidence whether a normalized form should be recorded or not. If it should be recorded, an optional guideline for recording the "variant title" (see 2.3.6.3) should be added analogous to 2.3.1.6.

<u>2.3.1.6 Introductory Words, etc.</u>

The omission of introductory words is an artificial change. In order to fulfill the principle of representation and accuracy (0.4.3.4 and 0.4.3.5), the German National Library prefers to record the title as it is. This would be compatible to scanning processes and processes of automatic indexing. Other forms should serve as additional access points. Please see also our comments on modifications in names and titles on page 3.

The rule "Do not transcribe words that serve as an introduction ..." contradicts to ISBD (A) 1.1.4.

2.3.1.7 Titles of Parts, Sections, and Supplements

We note that CONSER rules and LCRI differ in the handling of section titles from AACR2 and RDA stipulations. It seems indeed preferable not to limit the primary (preferred) source of information to the main title page.

2.3.6 Variant Title

2.3.6.3 Recording Variant Titles

Analogous to the first examples, the „title proper" should be stated as well in the last two examples. They would be easier to understand and consistent with the other examples.

2.4 Statement of Responsibility

We would like to see a statement here outlining that all persons considered as important enough to get an access point of their own should be mentioned in the bibliographic record.

2.4.1 Basic Instructions on Recording Statements of Responsibility

2.4.1.4 Recording Statements of Responsibility

We recommend clearly stating that, e.g. titles of nobility should be included in the statement of responsibility by renaming the guideline in the following way: "Transcribe a statement of responsibility in the form in which it appears on the source of information including information considered to be important for identification of a person or an institution, such as titles of nobility, professions, qualifications, place names, addresses, dates of birth and death, dates of founding, etc. Apply the general guidelines on transcription given under 1.7."

We suggest including the following example under this chapter: collected by John Parkinson apothecary of London, and the King's herbalist.

2.5 Edition Statement

2.5.1 Basic instructions on recording edition statements

2.5.1.4 Recording Edition Statements

Besides the stipulation "transcribe an edition statement as it appears on the source of information" we recommend recording also a standardized form of the edition statement: Different statements meaning the same like "2. ed." / "2nd ed." / "Second edition" / "Second ed.", etc., cannot be avoided. If besides the textual form a standardized form is given (e.g. "2"), corresponding statements could be identified more easily. This is important to be able to uniquely identify and assign the various manifestations.

At present we are assuming flat data records as the usual model (based on manifestations containing information on the work and expression, i.e. implementation scenarios 3 and/or 2). As in future also hierarchic models should be possible (one record for work, expression, and manifestation each, i.e. implementation scenario 1), we recommend including the edition statement in this standardized form already.

2.6 Numbering of Serials

2.6 calls for the transcription of numbering as it appears on the source of information. We would like to point out that normalized numbering data are important as well. They provide valuable access points for automatic processes and retrieval, and are used in the German Serials Union Catalogue (ZDB). We suggest that an option for controlled numbering data be introduced.

2.6.1 Basic Instructions on Recording Numbering of Serials

2.6.1.4 Recording Numbering of Serials

Page 89: We recommend adding an example illustrating the combined statements for the first and the last issues or parts (e.g. a serial that has ceased publication).

Page 91: We recommend adding an example illustrating the combined statements for multiple numbering systems.

2.6.2 Numeric and/or Alphabetic Designation of First Issue or Part

2.6.2.3 Recording Numeric and/or Alphabetic Designation of First Issue or Part

As this is marked as a core element, we suggest omitting the alternative guideline.

2.6.3 Chronological Designation of First Issue or Part

2.6.3.3 Recording Chronological Designation of First Issue or Part

As this is marked as a core element, we suggest omitting the alternative guideline.

2.6.4 Numeric and/or Alphabetic Designation of Last Issue or Part

2.6.4.3 Recording Numeric and/or Alphabetic Designation of Last Issue or Part

As this is marked as a core element, we suggest omitting the alternative guideline.

2.6.5 Chronological Designation of Last Issue or Part

2.6.5.3 Recording Chronological Designation of Last Issue or Part

As this is marked as a core element, we suggest omitting the alternative guideline.

2.7 Production Statement

Why is the „Production statement" not a core element? We recommend a clear definition of "production" and "manufacture", and suggest adding examples that illustrate 2.7.1 und 2.7.4.

2.7.3 Parallel Place of Production

The use of the term „parallel" could be interpreted differently. We suggest adding a clear example.

2.7.4 Producer's Name

2.7.4.4 Statement of Function

How are resources treated that are "published on demand"?

2.7.5 Parallel Producer's Name

Please see comments on 2.7.3.

2.8 Publication Statement

Only the „Publisher's name" and „Date of publication" are defined as core elements. The "Place of publication" is optional only. This leads to difficulties in the case of publishers with identical names. See also our comments on 0.6.2.

2.8.1 Basic Instructions on Recording Publication Statements

2.8.1.5 Recording Changes in Publication Statements

The general guidelines in this chapter speak of "annotations" whereas the alternative guidelines speak of "notes". The term "annotation" is not defined in the glossary. We suggest using "note" in general or is there a difference?

2.8.2 Place of Publication

Please see comments on 0.6.2

2.8.2.3 Recording Place of Publication

In the examples on page 122 the US federal states are not abbreviated according to Appendix B (e.g. Connecticut or VT). Shall the abbreviations in Appendix B only be used for the authorized form of names for places or geographic names? Appendix B.11 is linked to chapter 16 dealing with "Identifying places" not with the authorized forms.

We recommend information outlining in which cases other superior geographic names should be abbreviated.

Is the example "Mpls" correct?

2.8.3 Parallel Place of Publication

Please see comments on 2.7.3

2.8.4 Publisher's Name

2.8.4.3 Recording Publishers' Names

Please see our comments on modifications in names and titles on page 3.

2.8.4.4 Statement of Function

Please see comments on 2.7.4.4

2.8.4.7 No Publisher Identified

Second bullet: "Publisher not identified" is used instead of "s.n.". Other language communities will apply their languages. This might be easier to understand for local users which we appreciate. Nevertheless, we are wondering why the Latin abbreviations used in the ISBD cannot serve as an "international" language.

Third bullet: Are dissertations (7.9) still regarded as unpublished resources?

2.8.5 Parallel Publisher's Name

Please see comments on 2.7.3

2.8.6 Date of Publication

There are further dates that are important, e.g. "Date issued", "date modified", which are not covered yet. Are dissertations still regarded as unpublished resources? Which date is regarded as the date of publication for a dissertation?

2.8.6.5 Multipart Monographs, Serials, and Integrating Resources

Bottom of page 135: „If the date or dates cannot be approximated, do not record a date of publication." The examples do not illustrate the situation described.

As to the „integrating resources" there is the wording „iteration" as well as „update". We recommend consistent formulations.

2.9 Distribution Statement

2.9.3 Parallel Place of Distribution

Please see comments on 2.7.3

2.9.5 Parallel Distributor's Name

Please see comments on 2.7.3

2.9.6 Date of Distribution

2.9.6.5 Multipart Monographs, Serials, and Integrating Resources

It seems that examples are missing here. In 2.8.6.5 and 2.10.6.5 examples are included.

2.10 Manufacture Statement

2.10.3 Parallel Place of Manufacture

Please see comments on 2.7.3

2.10.4 Manufacturer's Name

Is "published on demand" classified as a publisher or as a manufacturer?

2.10.4.3 Recording Manufacturers' Names

Please see comments on 2.8.4.3

2.10.4.4 Statement of Function

Please see comments on 2.7.4.4

2.10.5 Parallel Manufacturer's Name

Please see comments on 2.7.3

2.11 Copyright Date

2.12 Series Statement

2.12.8 ISSN of Series

2.12.8.3 Recording the ISSN of a Series

It should be possible to record the ISSN even if it does not appear within the resource.

2.15 Identifier for the Manifestation

We recommend that the VD numbers also be added in RDA: VD16, VD17, and the future VD18 number.

VD16 stands for "Verzeichnis der im deutschen Sprachbereich erschienenen Drucke des 16. Jahrhunderts (VD 16)" (URL: http://www.vd16.de/), (http://www.vd17.de/).

Examples:

VD16 R 3830

VD17 12:101135B

2.15.1 Basic Instructions on Recording Identifiers for the Manifestation

2.15.1.5 More Than One Identifier for the Manifestation

P. 192, alternative: We recommend adding an example illustrating the alternative in the case of more than 3 identifiers.

Generally, we are wondering which identifiers are regarded as the most important ones? In view of the international data exchange we must decide on the priorities. We suggest defining a core set of identifiers.

2.15.2 Publisher's Number for Music

2.15.2.3 Recording publishers' numbers for music

Bottom of p. 194 example 2: The single numbers should be listed separately. This is important for the users but also for the librarians.

CHAPTER 3 DESCRIBING CARRIERS

Media type, Carrier type, and Content type

We acknowledge the JSC's approach to building on a RDA/ONIX framework. Defining types and genres has been an issue for many communities and with regard to data sharing it is advantageous to have a common basis.

The RDA/ONIX approach is built on a logical segmentation into separate terms. The combination of terms gives the overall picture of a resource.

We had an interesting discussion about which sections of chapter 3 and 4 can be regarded as successors of the former general material designation (GMD). In our opinion both sections 3.2 and 4.2 include successor rules on GMD. Will the successor terms be harmonized with the former GMDs? 3.2 is optional, and according to ISBD the GMD is an optional element directly following the title proper, whereas the Statement of International Cataloguing Principles includes the GMD as an indispensable access point.

The German code for descriptive cataloguing "RAK-WB" [Regeln für die alphabetische Katalogisierung in wissenschaftlichen Bibliotheken / Rules for the descriptive cataloguing in scientific libraries] which is used in Germany and Austria includes publication types like "thesis" in a note or "teacher's edition" in the edition area of the bibliographic description. The code for subject cataloguing RSWK [Regeln für den Schlagwortkatalog / Rules for the subject catalogue] contains subjects dealing with the form. We welcome term lists and codes which work in both, the descriptive and subject field.

We understand that the term "book" as a carrier type term might be confusing and therefore was replaced by the term "volume" which is accompanied by a definition, but we think that "volume"

might as well carry other connotations, e.g. a volume of a serial.
We discussed a proposal "bound volume" as being not convincing because it would exclude loose-leafs. So, unfortunately, we do not have another proposal than "book" or "volume". The question of whether the term "book" or "volume" is an appropriate term, belonging to the collective term "unmediated", is a hint that one of the most important carrier types, "paper", is still missing among the carrier type list.

Regarding the need to indicate the mode of issuance, we welcome the decision for further discussion as we consider this information important.

3.1 General Guidelines on Describing Carriers

3.1.1 Sources of Information

RDA suggests taking additional evidence from any source, if desired. We think that this gives a wide range of sources from which to take information. In comparison the rules in the International Standard Bibliographic Descriptions (ISBDs) are very traditional, prescribing square brackets.

The German National Library welcomes the more open approach but the expert groups have heterogeneous opinions on the value of square brackets. The meaning and intention of expressing a certain quality of information by square bracketing is well known to librarians, but not understood in other communities. Square brackets do not indicate where the information is taken from. The information that the source from which the information was taken is not the main source defined for a certain element, may now when the access to digitized materials allows immediate proof, be not be as valuable as it was in the past. In any case, a harmonization between RDA and ISBD is urgent.

3.1.6 Change in Carrier Characteristics

As this chapter covers changes in carrier and media type, we suggest clearly stating this in the heading by renaming it "Change in Carrier & Media Characteristics". Otherwise, the guidelines on changes in media type should be moved to chapter 3.2.

3.2 Media Type

3.2.1 Basic Instructions on Recording Media Type

3.2.1.2 Recording Media Type

We noticed that the guidelines on recording media type are basically consistent with the IFLA proposals for Area 0. However, instead of using the media type "computer", the term "electronic" is used in ISBD, which we would also prefer. We suggest adjusting RDA to the ISBD. This would also mean marking "media type" as a core element (please see comments on 0.6.2).

Does it make sense to distinguish between "projected" and "video"?

3.3 Carrier Type

3.3.1 Basic Instructions on Recording Carrier Type

3.3.1.2 Recording Carrier Type

The carrier type "video disc" should be included under video carriers. We suggest adding this carrier type as it is also used in an example for a DVD-Video in Appendix M (page 26).

There was a footnote to "volume" in the last draft of Chapter 3 which is missing now. What was the reason for this decision?

3.4 Extent

3.4.2 Extent of Cartographic Resource

3.4.2.2 Recording Extent of a Cartographic Resource

The terms "diagram" and "remote-sensing image" should be defined in the glossary.

The term "plan" should be included for a cartographic resource with a large scale.

3.4.4 Extent of Still Image

As noted in former comments the terms "painting" and "photograph" should be defined in the glossary as well.

3.4.5 Extent of Text

There is very detailed information on how to record the number of pages. Is this still up to date? We see the necessity from the user side to identify specific resources via the amount of pages but the cost benefit factor should be considered, too.

3.4.5.8 Complicated or Irregular Paging, etc.

We recommend including an example for an alpha-numeric or a multi-counting, e.g. A1-A16, B1-B5…

3.4.5.16 More Than One Volume

We would like to ask for the addition of one or more examples for the *Exception* as we think that it is difficult and time consuming to define the number of volumes based on the numbering of the serial.

3.5 Dimensions

3.5.1 Basic Instructions on Recording Dimensions

3.5.1.4 Dimensions of Carrier

The guidelines of this chapter seem to be too detailed. We recommend tightening the rules with more general guidelines.

3.5.1.4.14 Volumes
We recommend using "centimeters" as a consistent measuring unit. It does not make sense to record the height of the volume in millimeters if the volume measures less than 10 centimeters. We also think that the guidelines given under the *Exceptions* cause too much additional work and recommend omitting these.

3.6 Base Material

We would like to refer to our former comments on Part A, rev. Chapter 3, 3.6 that information needed for preservation management should be covered in RDA (like statements on acid-free paper, information about system requirements, …), because this information is essential for long-term archiving processes.

3.11 Layout

3.11.2 Layout of Cartographic Images

3.11.2.3 Recording Layout of Cartographic Images

Where is the difference between "double sided" as mentioned in 3.11.1.3 (page 93) and "both sides" as mentioned here? The explanation in this chapter is clearer than in 3.11.2.3.

3.16 Sound Characteristics

We suggest adding "digitally remastered", "remastered", "AAD", "ADD", "DDD".

3.19 Digital File Characteristics

Data concerning the rights of a digital resource (e.g. copyright, right of use, exploitation rights) are not included here.

An example "Not copy-protected" is given under 3.19.1.3. (Recording digital file characteristics). We think that it is not useful to record the rights of a digital resource only in a note as this information is necessary for digital rights management purposes.

3.19.2 File Type

3.19.2.3 Recording File Type

All the terms should be defined in the glossary.

3.19.3 Encoding Format

3.19.3.3 Recording Encoding Format

The encoding formats "flv" (Flash-Player-Format) and "DVD+R" should be added.

CHAPTER 4 PROVIDING ACQUISITION AND ACCESS INFORMATION

4.2 Terms of Availability

We think that licensing information is covered under 4.2 – 4.5. Is that correct? If not, where should it be stated?

4.2.1 Basic Instructions on Recording Terms of Availability

4.2.1.2 Sources of information

We suggest adding examples with information on licensing and open access for online resources.

4.5 Restrictions on Use

The information of movie rating is covered in chapter 7.7 "intended audience". We suggest a reference here to chapter 7.7.

4.6 Uniform Resource Locator

We suggest adding the possibility of including a note or explanation with the URL, e.g. full text, table of contents, …

SECTION 2: RECORDING ATTRIBUTES OF WORK AND EXPRESSION

CHAPTER 5 GENERAL GUIDELINES ON RECORDING ATTRIBUTES OF WORKS AND EXPRESSIONS

5.1 Terminology

5.1.1 Explanation of Key Terms

What does "specific technical meaning" mean?

* 5.1.3 Title

Chapter 5 includes guidelines on recording attributes of works and expressions. In 5.1.3 the definition of the term "title" only refers to work not to expression. According to FRBR the "title of the expression" is a logical attribute of an expression. It seems that in RDA expressions are not considered to have titles of their own. This discrepancy should be explained at a more prominent position, and we suggest a more restricted captioning of 5.1.3 by "Title of work".

* 5.1.4 Access Point

The explanation and definition of the key term access point should be placed centrally in the introduction. Repetitions in the single sections, if necessary, should have the same wording.

We would like to see, both in 5.1.4 (Access point for a work) and 8.1.4 (Access point for a person, family, or corporate body), an explanation as to what extent the identifying elements listed in 0.6.3, 0.6.4, 5.3, and 8.3 belong to the preferred access point (and equally to the variant access point?). We are not sure how to interpret the instructions in 5.1.4 and 5.3 (and equally in 8.1.4 and 8.3) in relation to 17.4.2.1, 18.4, etc.:
1) If all elements used to identify or to describe the resource are part of the preferred access point, they all have to be repeated fully if the preferred access point is used to represent the entity in related entities (e.g. as work manifested or as employee relationship).

2) If only a part of the elements shall be part of the preferred access point this part has to be defined, or better – as it is not always given that the elements preferred in first line (e.g. dates) can be ascertained – an order has to be defined in which a distinct number of primarily preferred elements have to be recorded as part of the preferred access point. In addition, another set of optional elements is defined, that may be included in the data describing the work and may serve as an access point, but is not part of the preferred access point.

3) If not a text string for the preferred access point but an identifier of the entity is used to represent the entity in related resources and/or entities, the representation of the text form of the access point, generated from the number and provided for the user, can be customized according to the special needs of the respective community – provided that they are recorded. So even in this case, we need a core set or core set order of the elements which have to be recorded.

We would appreciate rules according to alternative 2, enabling a more flexible core set of elements as part of the preferred access point and an additional set of optional data elements that are not part of the preferred access point.

We do not understand why the identifier of the work is not considered to be a preferred access point, all the more as the identifier - as a language-independent element – is the only property of the entity that is unambiguous in the domain in which it is assigned.

5.2 Functional Objectives and Principles

We are wondering why the functional objectives and principles mentioned in 8.2 are more detailed than the ones in chapter 5.2. As both of these are general guidelines we recommend adjusting them.

Please see also our comment on 0.4.3.4 regarding the source of information for recording the preferred title of a work.

5.3 Core Elements

According to FRBR more elements exist. Some of them are covered by chapter 6 or 7, some not (e.g. "intended termination", "context for the work"). RDA should be aligned to FRBR.

As to cartographic resources: in which cases should a cartographic resource be described more fully?

5.4 Language and Script

Please compare our comments on 0.4.3.4 and 0.4.3.7.

5.5 Preferred Access Points Representing Works and Expressions

It seems to us that, compared to the former draft, some rules were revised and some were not. E.g. the sentence "When constructing a preferred access point to represent a part or parts of a work, apply the instructions given under 6.27.2" was revised, whereas the sentence "When constructing a preferred access point to represent a particular expression of a work or of a part or parts of a work, add to the preferred access point representing the work or a part or parts of the work an element or elements identifying that expression (see 6.27.3)" was not. This needs to be double-checked before publishing.

5.7 Status of Identification

5.7.1 Basic Instructions on Recording the Status of Identification

5.7.1.3 Recording the Status of Identification

We noticed that the annotations to "provisional" and "preliminary" are only given as a note in chapter 5.7.1.3 whereas they are included in the text in the equivalent chapter 8.10.1.3. Both chapters should be adjusted.

We would also like to note that the terms "provisional" and "preliminary" are too alike to indicate the difference in meaning. We understand that the terminology is taken from MARC 21 authority, but would appreciate clearer terms or clear definitions.

5.8 Source Consulted

5.8.1 Basic Instructions on Recording Sources Consulted

5.8.1.3 Recording Sources Consulted

If the information is taken from a specific resource, we recommend adding a reliable address giving access to the resource (an identifier or a signature). We would appreciate guidance in which cases to add a time stamp for gathering the information.

We would appreciate the option to link to an URI.

We suggest making the brief statement of information found optional.

We recommend establishing a list of preferred reference sources (including authority files) and a sequence in which they should be consulted. (We are used to work in this way in the German authority files.) We also recommend using standardized short forms or codes for the main reference sources.

CHAPTER 6 IDENTIFYING WORKS AND EXPRESSIONS

The heading of chapter 6 refers to the identification of works and expressions but the chapter also includes guidelines on recording other identifying attributes of works and expressions. This should be reflected in the heading.

The structure of chapter 6 is confusing. Between the description of elements referring to works (6.2-6.9 and 6.15-6.26), guidelines on recording elements referring to expressions are included (6.10-6.14). We suggest changing the order so that all elements referring to works are included in 6.2-6.21 and all the elements referring to expressions are included in 6.22-6.26.

We observe that the instructions for legal works, religious works, and official communications are "Anglo-American centered". Some do not fit to our German legal system. These instructions contradict the JSC's objective to make rules that are internationally applicable.

Throughout chapter 6 (e.g. in 6.28.2.3.) there are references to 6.15.2.10. This chapter does not exist.

6.1 General Guidelines on Identifying Works and Expressions

6.1.3 Changes Affecting the Identification of a Work

6.1.3.1 Works Issued as Multipart Monographs

The wording in the heading "works issued as multipart monographs" seems to be difficult because one could argue that works cannot be issued. Perhaps it should be named "works embedded in multipart monographs"? We do not understand why there should be changes at the work level regarding the "mode of issuance" or regarding the "media type".

Question: How would you record the work "Joseph und seine Brüder" by Thomas Mann which is a tetralogy. Perhaps this work could serve as an example for this rule.

What happens in the case that the title of the work changes and varies in citation, especially in regard of the instructions in 6.2.2.4?

6.2 Title of the Work

6.2.1 Basic Instructions on Recording Titles of Works

Titles are regarded as names and should not be modified. We suggest using the preferred title recorded as in the form given in the respective source of information (with the exception of layout-based variations which should be normalized). However, it must be ensured that various titles are established for other forms under which the title might be sought for. Please compare also our general remark on modifications in names and titles.

If you want to retain single rules, we propose not to repeat them but to link to the related appendices. Especially with the online-tool in mind, repetitions are not necessary. Single rules (e.g. for "Spacing of initials and acronyms") should be consistent for titles, names of persons, etc.

6.2.1.1 Scope

The definition of "title of the work" should be harmonized with the definition given in the ISBD (4.2.1).

6.2.1.7 Initial Articles

The JSC decided that this instruction should remain as a concession to the current state of many library management systems. Again, we would like to state that in an online environment omitting an initial article is no longer necessary and even unimportant. We think that initial articles should be recorded in any case. For the sorting in an OPAC or a bibliography the initial article can be skipped. The omission of initial articles can often cause grammatical nonsense in inflected languages. For example, in the German language the adjective changes if one omits the article. Example:
"Der seidene Faden" would be "Seidener Faden" without the article.

The omission of initial articles can also imply a compound where it is not. Example:
"Der Meerjungfrau Gesang" could be "Meerjungfrau-Gesang" without the article.

6.2.1.8 Spacing of Initials and Acronyms
Please see comments on Appendix C.

6.2.2 Preferred Title for the Work

6.2.2.4 Works Created After 1500

The instructions in 6.2.2.2 and 6.2.2.4 on recording the preferred names for modern works primarily refer to works which have already been manifested in more than one resource and which citation forms might have been subjected to changes and/or variations during their life cycles.

But after having started with cataloging according to RDA, we will have another scenario: As the "work manifested" is defined as a core element a preferred access point will be established for each new one, and - if appropriate - this access point shall remain the same in all upcoming manifestations of the same work. In this scenario, the title proper of the first manifestation will be chosen as the preferred title of the work, and varying titles of subsequent manifestations might be used as variant titles of the work, if appropriate.

1) We would appreciate if RDA would give instructions on both scenarios: on establishing the preferred title of the work in retrospect, and on establishing the preferred title basing on the first manifestation.

2) If the preferred title of the work is based on the first manifestation: Are there cases in which the preferred title of the work has to be changed?

3) Why does the wording in 6.2.2.4 differ from the wording in 5.2 and 0.4.3.4? According to 6.2.2.4 only the title has to be in the original language, not the resources from which they are taken.

A general question regarding "first resource received" which occurs also in the following chapters:
6.2.2.6, 6.27.1.3, 6.29.1.15, 6.29.1.17, 9.2.2.5.4, 11.2.2.5.1, 11.2.2.5.2, 11.2.2.28.
What exactly does "first resource received" mean? From whom, from where should the resource be received? Does this refer to a resource first received in a local catalogue or in a library network or to the first resource received world-wide…? A definition could be helpful.

In chapter 9.2.2.5.2 the time border lies before 1400, in 6.2.2.4 before 1500. We suggest establishing 1500 as the borderline in both cases as this year is regarded as the end of the Middle

Ages in the European age. This is an established time border and reflects the state of the art of science and research.

We also noticed that the examples given in chapter 6.2.2.4 refer mainly to the Anglo-American sphere. We would prefer examples reflecting different language areas.

6.2.2.5 Works Created Before 1501

It is not clear what is meant with "modern sources". We suggest adding the word "reference" between the words "modern" and "sources".

6.2.2.6 Cycles and Stories with Many Versions

Please see our question regarding „first resource received" in 6.2.2.4.

6.2.2.10 Recording the Preferred Title for a Part or Parts of a Work

6.2.2.10.2 Two or More Parts
We would like to request an example for the alternative guideline.

6.3 Form of Work

We recommend recording the form of a work by using a list of controlled vocabulary. Translations of the terms in different languages should be taken into account. As unambiguousness is important for data exchange, a definition or even a code might help to bring together different language terms. A list of controlled vocabulary would help to achieve the RDA goal of interoperability.

6.4 Date of Work

6.4.1 Basic Instructions on Recording Date of Work

6.4.1.1 Scope

The definition of the term "date of work" should be adjusted to the definition used in FRAD which is "The first date (normally the year) associated with the work [FRBR, modified]". The last sentence from the FRBR definition "In the absence of an ascertainable date of creation, the date of the work may be associated with the date of its first publication or release." needs to be added to 6.4.1.1. We assume that dates which are part of access points should be recorded in a standardized form.

6.4.1.3 Recording Date of Work

According to 6.4.1.3, the date of the work should be recorded by giving the year or years alone. This is insufficient as it is already common practice to record specific dates for online publications. We suggest changing the wording into "Record the date of the work by giving the year or years alone or the specific date when appropriate."

6.5 Place of Origin of the Work

The country as the place of origin of the work should be preferred, ideally using a country code following ISO 3166-I.

6.9 Identifier for the Work

6.9.1 Basic Instructions on Recording Identifiers for Works

6.9.1.3 Recording Identifiers for Works

We suggest including an example for an URI.

6.10 Content Type

In our opinion, a list of content type(s) needs regular updating. With respect to international data exchange, translations of terms into different languages should be taken into account.

Unambiguousness is important for data exchange and a definition or even a code might help to bring together different language terms. Local systems should be expected to resolve a code into an intelligible term.

We suggest renaming the heading into "Content type for the expression" analogous to 6.11-6.14.

We have provided a table containing a comparison between RDA Content Type and ISBD Content Form and ISBD Content Qualification. We think that recording the content type on two different levels is more flexible for the user's needs, it will be more and more important for selection purposes in online catalogues. In our table all RDA Content Type entries could be allocated to the ISBD terms. RDA should be harmonized with the new IFLA suggestions on Area 0 "Content form and media type".

6.11 Date of Expression

6.11.1 Basic Instructions on Recording Date of Expression

6.11.1.3 Recording Date of Expression

In line with 6.4.1.3, it is necessary to record a specific date for an expression as well.

As a general question we would like to know how three identical dates should be recorded: at all three levels (work, expression, and manifestation)?

6.14 Identifier for the Expression

6.14.1 Basic Instructions on Recording Identifiers for Expressions

6.14.1.3 Recording Identifiers for Expressions

For musical works the "ISRC - International Standard Recording Code" should be added.

The "ISAN - International Standard Audiovisual Number" should be added for audiovisual works.

The "ISWC - International Standard Work Code" gives an identifier for a work and another identifier for each of its expressions.
Example:
ISRC: DEC610701239

Additional instructions for legal works

As already stated in the previous commentaries we still think that the instructions for legal works, religious works, and official communications are "Anglo-American centered". Some do not fit to the European legal system (or German law). We recommend abandoning chapters 6.23 to 6.27 with

the additional instructions for legal works and integrating them into the general instructions. However, in case you want to retain those chapters, we would like to point out especially the comments on 6.29.1.21.1, 6.29.1.23, and 6.29.1.26.

6.20 Title of a Legal Work

<u>6.20.4 Preferred Title for a Legal Work</u>

<u>6.20.4.2 Modern Laws, etc.</u>

6.20.4.2.2 Single Laws, etc.
We would like to ask for a clear definition for the following terms: official short title, unofficial short title, and official title of the enactment.

6.23 Title of a Religious Work

<u>6.23.2 Preferred Title for a Religious Work</u>

<u>6.23.2.8 Liturgical Works</u>

We think that constructing the preferred access point representing the work by combining the preferred access point for the church or denominational body and the preferred title as mentioned in 6.30.1.5 is not useful. We suppose that there are many liturgical works where an allocation to a specific corporate body is vague or ambiguous. Instead of that, we suggest that a corporate body should be only added when constructing the variant access point and only if the allocation of the work to a church or denominational body is unambiguous.

Exceptions: Early Catholic liturgical works
It seems to be not practicable to use the Tridentine title if a Catholic liturgical work compiled before the Council of Trent (1545-1563) has a close counterpart in a Tridentine work as instructed in 6.23.2.8. We recommend using the title by which the work is identified in reference sources as mentioned at the bottom of page 108.

By combining the old chapters 6.29.5 and 6.29.6 from the December 2007 draft a mistake crept into this guideline. The sentence "If such a work has no close counterpart among Tridentine liturgical works, or in case of doubt, use the title by which the work is identified in reference sources" belongs to Catholic liturgical works not to Jewish liturgical works and should be place before "For Jewish liturgical works, follow the instructions given under 6.23.2.7".

<u>6.23.2.9 Parts of the Bible</u>

We consider recording a part or parts of a sacred scripture as a subdivision of the preferred title for the Bible as a disadvantage as it creates hierarchies. Furthermore, it seems to be an inconsistency that a work which is commonly identified by its own title, viz. single selections in 6.23.2.9.5, is not recorded as a subdivision of the preferred title for the Bible. Therefore, we recommend recording all titles of parts of sacred scriptures just as the "single selections" in 6.23.2.9.5, viz. not as a subdivision of "Bible".

In view of the correct automatic sorting, the use of Roman numerals for adding a chapter as instructed in 6.23.2.9 does not seem useful. In accordance to the international customary quotation among theologians we recommend adding the chapter in Arabic numerals as well.

6.25 Other Distinguishing Characteristic of the Expression of a Religious Work

6.25.1 Basic Instructions on Recording Other Distinguishing Characteristics of the Expression of a Religious Work

6.25.1.4 The Bible and Parts of the Bible

The guideline to use a short form of the translator's name as mentioned in 6.25.1.4 seems to be problematic for us. The suggested short forms, e.g. Lamsa is not very widely known in Germany. We would prefer, e.g. Lamsa, Bible.

6.27 Constructing Access Points to Represent Works and Expressions

6.27.1 Preferred Access Point Representing a Work

6.27.1.2 Works Created by One Person, Family, or Corporate Body

Please include some examples for persons as creators of popular music to make clear the differentiation between a person as a creator and a performer.

6.27.1.3 Collaborative Works

Please see our question in 6.2.2.4

We assume that the preferred access point(s) for the creator(s) and the preferred title of the work may be recorded as separate elements. Is it correct that additional creators can be recorded as relationships with the appropriate relationship designator, e.g. "author"? We presume that the list of subtypes is not conclusive? We suggest renaming chapter 6.27.1.3 by "Works created collaboratively by two or more persons, families, or corporate bodies."

There is no information included on the construction of a preferred access point when the work is presented as a collaborative work of a personal author and a responsible corporate body.

6.27.1.4 Compilations of Works by Different Persons, Families, or Corporate Bodies

It would be helpful to get information on the kind of criteria applied to distinguish between a "creator-compiler" and a non-creator-compiler. Which criteria make a compiler or editor a creator? We propose the inclusion of definitions of the terms compiler, creator, and editor.

6.27.1.5 Adaptations and Revisions

A reference to the chapters covering relationships and adapted works should be given here.

6.29 Constructing Access Points to Represent Legal Works

6.29.1 Preferred Access Point Representing a Legal Work

6.29.1.15 Treaties, etc., Between National Governments

Please see our question in 6.2.2.4

6.29.1.17 Agreements Contracted by the Holy See

Please see our question in 6.2.2.4

6.29.1.21 Reports of One Court

6.29.1.21.1 Reports Not Ascribed to a Reporter or Reporters by Name
We see difficulties in the wording "... follow the accepted legal citation practice in the country ...".
It seems to be very time consuming to find out the accepted legal citation practice.

6.29.1.23 Citations, Digests, etc.

In 6.29.1.23 the wording is "If the person responsible for citations ... is prominently named in the resource ...". It would be helpful to get a definition what means "prominently named". Is it only the title page or the first screen?

6.29.1.26 Indictments

As this chapter only refers to 6.29.1.24 and includes an example we suggest integrating "indictments" into 6.29.1.24.

CHAPTER 7 DESCRIBING CONTENT

The structure of chapter 7 seems to be illogical. Why were e.g. the attributes for cartography content separated into the subchapters 7.4-7.6 and 7.25.-7.27? It seems that the different attributes for describing the content are arranged arbitrarily. We suggest aligning the core elements and the elements describing content to the attributes of a work and an expression according to the FRBR.

7.2 Nature of the Content

7.2.1 Basic Instructions on Recording the Nature of the Content

7.2.1.3 Recording the Nature of the Content

We wonder how works should be treated where the primary content consists of images (e.g. illustrated books, art books or exhibition catalogues). We suggest including examples for this kind of publications.

7.9 Dissertation or Thesis Information

7.9.2 Academic Degree

7.9.2.3 Recording Academic Degree

Are the academic degrees Diplom, Bachelor, Magister also covered by this chapter or should only the higher academic degrees (Dr., Prof., …) be recorded? We recommend including German examples as well.

We would like to know whether e.g. the degree "Doctor" should be recorded in a standardized form like "Dr." or whether recording "Dr. rer. nat." would be possible as well.

We suggest including examples for academics with postdoctoral lecture qualification (e.g. "Habil.", "Dr. phil. habil.", "Prof.") as well.

7.9.3 Granting Institution or Faculty

7.9.3.3 Recording Granting Institution or Faculty

The instruction is worded very generally. There is no guideline indicating in which order the university and faculty or department should be recorded or in which cases the city should be recorded as well. The examples do not include a faculty or department of an university.

7.11 Place and Date of Capture

7.11.1 Basic Instructions on Recording Place and Date of Capture

7.11.1.1 Scope

Does this also cover the place and date associated with a photograph? If so, we suggest including an example. We generally like to note that the differentiation to 2.7 (production statement) is not very clear.

7.11.3 Date of Capture

7.11.3.3 Recording Date of Capture

The specific date of capture should be recorded whereas the date of work (6.4.1.3) and date of expression (6.11.1.3) should be given by the year or years alone. These guidelines should be adjusted and as we noted in 6.4.1.3 and 6.11.1.3, we request the recording of the specific date (if appropriate).

7.12 Language of the Content

7.12.1 Basic Instructions on Recording Language of the Content

7.12.1.3 Recording Language of the Content

Additionally to the free text examples we suggest providing an alternative with the language codes according to ISO 639-2 which could be machine processed later on and in 7.13.2.3 there already is a rule to apply the ISO codes. We do not recommend mixing free text and methods for machine readable categorization.

7.15 Illustrative Content

7.15.1 Basic Instructions on Recording Illustrative Content

7.15.1.4 Details of Illustrative Content

As already noted in 7.2.1.3, we wonder how works should be treated where the primary content exists of images. What about those cases where the illustrations and the texts have the same proportion and significance? Are they treated differently?

7.17 Colour Content

We suggest including information on the technical description of colours in digital resources.

7.17.2 Colour of Still Image

7.17.2.3 Recording Colour of Still Images

Are the references to 7.22.1.3 / 7.22.1.4 correct?

7.17.3.3 Recording Colour of Moving Images

Are the references to 7.22.1.3 / 7.22.1.4 correct?

7.26 Projection of Cartographic Content

7.26.1 Basic Instructions on Recording Projection of Cartographic Content

7.26.1.3 Recording Projection of Cartographic Content

We prefer recording the coordinates even if it is more labor intensive for the first time. There is also the possibility to record the coordinates with leading zero or with leading zero two-digit and three-digit:

W 074 50 - W 074 40 / N 045 05 -N 045 00 ----- (074 stands for 74 grid, 50 = 50 minutes inside graticule).

SECTION 3: RECORDING ATTRIBUTES OF PERSON, FAMILY, AND CORPORATE BODY

CHAPTER 8 GENERAL GUIDELINES ON RECORDING ATTRIBUTES OF PERSONS, FAMILIES, AND CORPORATE BODIES

8.1 Terminology

8.1.2 Person, Family, and Corporate Body

The definitions of persons, families, and corporate bodies are given on a very abstract level and lack practical guidelines. We would appreciate guidance on which subtypes belong to these entity types, e.g. whether fictitious characters, divinities or legendary figures are regarded as persons, and how families and corporate bodies are distinguished. When the name of an entity includes the word "family", is it clearly a family then, but not a corporate body?

What is the difference between an "identity established by an individual (in collaboration with more other individuals)" stated under the definition for the term person and a "group of persons" stated under the definition for corporate bodies? Would that make "Ursus & Nadeschkin" (a comedian duo) a person or a corporate body?

8.1.3 Name

Does the definition of "name" as mentioned here include identifiers? We would appreciate if identifiers would be named as "names" in 8.1.3. At any rate identifiers are lacking as access points in 8.1.4.

8.1.4 Access Point

We would like to see identifiers included as access points.

* 8.2 Functional Objectives and Principles

Please exchange the term "understand" with "clarify" analogous to 0.0 in chapter 8.2.c).

8.3 Core Elements

Why does a constraint have to be made in the case "for a person whose name consists of a phrase or appellation not conveying the idea of a person" at "profession or occupation" and "field of activity of the person"? This information is not only an important identification attribute for this special group of persons.

Additional identifying attributes should be recorded in any case, not only to differentiate similar forms of names.

The explanation and definition of the key term access point should be placed centrally in the introduction. Repetitions in the single sections, if necessary, should have the same wording.

It would be helpful, both in 5.1.4 (Access point for a work) and 8.1.4 (Access point for a person, family or corporate body), to have an explanation to what extent the identifying elements listed in 0.6.3, 0.6.4, 5.3, and 8.3 belong to the preferred access point (and equally to the variant access point?). We are not sure how to interpret the instructions in 5.1.4 and 5.3 (and similarly in 8.1.4 and 8.3) in relation to 17.4.2.1, 18.4, etc.:
1) If all elements used to identify or to describe the resource are part of the preferred access point they all have to be repeated fully if the preferred access point is used to represent the entity in related entities (e.g. as work manifested or as employee relationship).

2) If only a part of the elements shall be part of the preferred access point this part has to be defined, or better – as it is not always given that the elements preferred in first line (e.g. dates) can be ascertained – an order has to be defined in which a distinct number of primarily preferred elements have to be recorded as part of the preferred access point. In addition, another set of optional elements is defined, that may be included in the data describing the work and may serve as access point, but is not part of the preferred access point.

3) If not a text string for the preferred access point but the identifier of the entity is used to represent the entity in related resources and/or entities, the representation of the text form of the access point, generated from the number and provided for the user, can be customized according to the special needs of the respective community – provided that they are recorded. So even in this case, we need a core set or core set order of the elements which have to be recorded.

We would appreciate rules according to alternative 2, enabling a more flexible core set of elements as part of the preferred access point and an additional set of optional data elements that are not part of the preferred access point.

We do not understand why the identifier of the work is not considered to be a preferred access point, the more as the identifier - as a language-independent element – is the only property of the entity that is unambiguous in the domain in which it is assigned.

We propose to add "type" as a core element for persons (in the case of multiple identities, fictive persons etc.) and corporate bodies (in the case of ambiguous entities).

8.4 Language and Script

The guidelines in 8.4 contradict the guidelines given under 8.2. The alternative guideline should be mentioned in 8.2 already.

There are also contradictions between 8.4 (names in the language and script in which they appear on the sources), 0.4.3.4 (a well accepted name or form of name in the language and script preferred by the agency) and 0.4.3.7 (original language and script).

8.5 General Guidelines on Recording Names

Please see our comments on modifications in names and titles on page 3.

8.5.2 Capitalization

Please see our comments on modifications in names and titles on page 3.

8.5.3 Numbers Expressed as Numerals or as Words

Please see our comments on numerals on page 3.

8.5.4 Accents and Other Diacritical Marks

Please see our comments on modifications in names and titles on page 3.

Is it possible that there is a contradiction in this chapter? The first sentence asks for recording "accents and other diacritical marks appearing in a name as they appear in the source of information". The following sentences ask for corrective changes.

8.5.5 Hyphens

Please see our comments on modifications in names and titles on page 3.

8.5.6 Spacing of Initials and Acronyms

Please see our comments on modifications in names and titles on page 3.

The guidelines given in 8.5.6 contradict with the ones given in 1.7.6.

8.5.7 Abbreviations

Please see our comments on modifications in names and titles on page 3.

We think that this rule is not necessary and recommend omitting abbreviation rules.

8.6 Preferred Access Points Representing Persons, Families, and Corporate Bodies

We think that the guidelines given in 8.6 do not correspond to the order given in 0.6.4. We would like to ask for their adjustment.

We strongly recommend to adjust the rules for constructing the preferred access point for corporate bodies to the general rule given in 0.6.4 which indicates that the identifying elements may be recorded either as additions to the preferred access point or as separate elements or as both.

8.7 Variant Access Points Representing Persons, Families, and Corporate Bodies

We presume that an access point is considered to be a short representation of the entity whereas the authority record and/or the bibliographic record is a rich representation of the entity including the entity description and access points representing related entities.

If this assumption is true, the preferred access point is a unique textual citation form which gives access to the record for the entity, and thus has a complementary function to the entity identifier. The identifier enables machine-processible linking and search functionalities to be able to search

with all variant names and names of related entities. The preferred access point, on the other hand, is the human-readable representation of an entity in the record for a related other entity.

If this assumption is true, too, variant access points are only needed in a system without rich descriptions (without authority records) for the entities represented by the access points, and/or without identifiers. In this case we regard it as indispensable that the variant access points for persons (families, corporate bodies) should be incorporated in the variant access points for the work. The growing number of possible variations in a large catalogue is an evidentiary argument for working with authority files and identifiers.

8.8 Scope of Usage

8.8.1 Basic Instructions on Recording Scope of Usage

It is not clear in which cases the "scope of usage" should be recorded. Should it be recorded in a controlled or uncontrolled form? We suggest that this information be recorded in a standardized form. Is there any relationship between "scope of usage" (8.8.1) and "form of work" (6.3)?

8.8.1.1 Scope

We would appreciate advice in which cases the "scope of usage" should be recorded. Is it meant, e.g. for the differentiation of different identities of a person (by the use of pseudonyms)?

8.9 Date of Usage

8.9.1 Basic Instructions on Recording Date of Usage

8.9.1.1 Scope

This rules should be applied not only for the preferred name but for all forms of the name. Does "usage" refer to the usage of the name by the person or by the agency? Where should this information be recorded? More examples should be given here especially how these changes would look like in a data record:
- an example for a marriage
- examples for families and corporate bodies

The dates should be given in a standardized form.

8.10 Status of Identification

8.10.1 Basic Instructions on Recording the Status of Identification

8.10.1.3 Recording the Status of the Preferred Access Point

We noticed that the annotations to "provisional" and "preliminary" are only given as a note in chapter 5.7.1.3 whereas they are included in the text in the equivalent chapter 8.10.1.3. Both chapters should be adjusted.

We would also like to note that the terms "provisional" and "preliminary" are too alike to indicate the difference in meaning. We understand that the terminology is taken from MARC 21 authority, but would appreciate clearer terms or clear definitions.

8.11 Undifferentiated Name Indicator

8.11.1 Basic Instructions on Recording an Undifferentiated Name Indicator

8.11.1.3 Recording an Undifferentiated Name Indicator

As instructed in 9.19.1.1 and 10.10.1.1, the undifferentiated name indicator only occurs for persons and families, not for corporate bodies. As chapter 8 includes general guidelines for persons, families, and corporate bodies, the information that the undifferentiated name indicator does not occur for corporate bodies needs to be given.

8.12 Source Consulted

8.12.1 Basic Instructions on Recording Sources Consulted

8.12.1.3 Recording Sources Consulted

If the information is taken from a specific resource, we recommend adding a reliable address giving access to the resource (an identifier or a signature). We would appreciate guidance in which cases to add a time stamp for gathering the information.

We would appreciate the option to link to an URI.

We suggest making the brief statement of information found optional.

We recommend establishing a list of preferred reference sources (including authority files) and a sequence in which they should be consulted. (We are used to work in this way in the German authority files.) We also recommend using standardized short forms or codes for the main reference sources.

8.13 Cataloguer's Note

Instructions for the cataloguer's note are cited at several places within RDA. Should the cataloguer's notes be recorded in separate data elements or are they covered in one data element?

CHAPTER 9 IDENTIFYING PERSONS

We would also like to note that it would be helpful when the guidelines for preferred and variant names were presented consistently in chapter 9 and Appendix F.

We recommend reorganizing the examples especially in this chapter. The differentiation between the form of name found in the resource, the preferred form and the variant forms is very complex and it would be much clearer to give the different forms next to each other. One example for a hyphenated surname:
Name in the resource: Daniel Day-Lewis
Preferred name: Day-Lewis, Daniel
Variant name: Lewis, Daniel Day-

We recommend that more references be provided to the Appendices, especially to Appendix F, in this, and the other chapters.

9.0 Purpose and Scope

The footnote on page 1 "Person, as used in this chapter, refers to a human or non-human individual or to an identity established by an individual (either alone or in collaboration with one or more other individuals)" should be included in the main text analogous to chapter 10.0 and 11.0.

9.2 Name of the Person

It seems that the examples given in this chapter are represented partly as they appear in the item in hand and partly in the recorded form. This is confusing.

9.2.2 Preferred Name for the Person

9.2.2.1 Scope

The definition seems to differ from the ones in the latest version of the Statement of International Cataloguing Principles. They should be adjusted.

9.2.2.2 Sources of Information

No information about the original language and script is included. This contradicts 0.6.4 and 8.2.

9.2.2.3 Choosing The Preferred Name

We are wondering whether 9.2.2.3 and 9.2.2.2 are consistent with each other. According to 9.2.2.3 the commonly known name for a person should be chosen as the preferred name. But what does "commonly known" mean - is the resource associated with the person the main source or the sources cited in 9.2.2.2 in descending order? It could be difficult to determine what is "commonly known". We neither want to count records nor to continuously change to the latest or fullest form. We would prefer to choose the name by using a list of predefined reference sources from the particular country including authority files.

9.2.2.5 Different Forms of the Same Name

If the form of a person's name varies in fullness, the form most commonly found has to be chosen as the preferred name, as mentioned in 9.2.2.5.1. We wonder what "most commonly found" means. We do not want to count records. There is no information included where the variation appears and in which in-depth research should be done.

General Guidelines
As a general guideline we propose that the form already established in the authority file preferred by the agency creating the data or the form verified in another reliable authority file be taken as the preferred name:

If the name is new to the catalogue and the resource in hand is a newly published resource and cannot be found in another reliable authority file, it should be taken from the main sources of information in the resource in hand. If the name is new to the catalogue but not newly published and the name can be found in another reliable authority file, the preferred name of that authority file should be taken as the preferred name. If the name is new to the catalogue but not newly published and cannot be found in another reliable authority file, the name most frequently used in the resources in the original language and script of the work associated with the person should be recorded as the preferred name. Other forms of the name by which users may search (including other linguistic forms) are recorded as variant names.

The preferred name of the person - except for those cases in which the person her-/himself changes her/ his name - should only be changed in the case of mistakes or in the case of objections of the author or publisher.

We wonder why the general statement in chapter 8.4 on recording names in the language and script in which they appear on the sources from which they are taken does not correspond with the instructions in chapter 9.2.2.5.

9.2.2.5.1 Fullness
We would like to choose the form most commonly found by using a list of predefined reference sources from the particular country if the forms of a person's name vary in fullness. As noted in 9.2.2.3 and 9.2.2.5, we would not like to count records.

The rules in 9.2.2.5.1 regarding fullness seem to be cumbersome.

9.2.2.5.2 Language
Please see our comment regarding the time border in 6.2.2.4. Latin is the language we prefer for the time segment before 1500.

9.2.2.5.4 Spelling
Please see our question regarding "first resource received" in 6.2.2.4.

The reference to 9.2 in the second passage seems to be very common. Would it be possible to make the reference more precise?

9.2.2.6 Different Names for the Same Person

The second part of the guideline asks for the orientation to the resources not to the work / expression level.

The difference between 9.2.2.6 and 9.2.2.8 does not seem to be very clear. In which case does a person have different identities and in which case only several names according to the rules?

9.2.2.8 Individuals with More Than One Identity

In the German authority file for persons (PND) we do not link the real name with the pseudonym for persons of the 20th/21st century if we cannot determine the different identities in reliable reference sources (also reliable web pages like author's web page). Otherwise we use only one common authority record for all identities so that all publications are linked with this unique record. For persons living before the 20th century we normally can determine the variant identities more easily and to a greater degree of accuracy (in reference sources). In this case we use one authority record as well.

There are cases where one person uses a pseudonym as the interpreter as well as her/his real name as the composer within the same group of works and even on the same source of information (e.g. Muddy Waters / MacKinley Morganfield). How would we deal with these cases?

9.2.2.9 General Guidelines on Recording Names Containing a Surname

Exceptions
We would like to note that the law relating to the use of name is different in Germany. It is possible that the family name is the woman's surname. We suggest adjusting this on page 24 and the following chapter 9.2.2.9.4 in a more common way. Our suggestion for this chapter is:
b) the name is of a married person identified only by her/his married partner's name and a term of address (see 9.2.2.9.4).

9.2.2.9.4 Married Woman identified Only by Her Husband's Name
Please see our comment on 9.2.2.9. Our suggestion for this chapter is:
"Married person identified only by her/his married partner's name".

9.2.2.9.5 Words, etc., Indicating Relationship Following Surnames
Are these words indicating relationships seen as additions?

9.2.2.9.6 Saints
Please see our comment on 9.19.1.1.

9.2.2.10 Compound Surnames

9.2.2.10.2 Established Usage Not Determined
We strongly recommend that „*Names of persons: national usages for entry in catalogues*" be integrated in the online tool, and in an Appendix.

9.2.2.11 Surnames With Separately Written Prefixes

9.2.2.11.1 Articles and Prepositions
Finnish and Russian are missing in the list on page 31 and in Appendix F.

We would recommend that this rule be tightened. Moreover we would not omit articles in surnames because they belong to the names.

9.2.2.15 Titles in the United Kingdom Peerage That Include a Territorial Designation

We recommend moving the instructions on recording names containing a title of nobility in Appendix G as these instructions are very country specific.

9.2.2.16 Judges of the Scottish Court of Session Bearing a Law Title Beginning with Lord

We recommend moving the instructions on recording names containing a title of nobility in Appendix G as these instructions are very country specific.

9.2.2.18 General Guidelines on Recording Names Containing Neither a Surname nor a Title of Nobility

The use of the comma as a separation mark makes this rule difficult to understand and to apply.

It is not clear whether these word or phrases denoting place of origin, domicile, occupation, or other characteristics should be recorded as part of the name or as an addition.

9.2.2.19 Names Including a Patronymic

We would like to note that patronymics are only mentioned in the context of given names. Guidelines on Russian names are missing and we would like to request the inclusion of examples for Slavic patronymics.

9.2.2.20 Names of Royal Persons

We suggest bringing together all rules for names of royal persons in one chapter. It would be more convenient to have them at one place in the rules. We also miss guidelines for recording names of royal persons for certain countries, e.g. Chinese emperors' names.

We would like to add a note, that the names of royal persons can be recorded in the established form in the language preferred by the agency creating the date.

9.2.2.23 Phrase Consisting of a Forename or Forenames Preceded by a Term of Address, etc.

The use of the comma as a separation mark makes this rule difficult to understand and to apply.

It is not clear whether these word or phrases denoting place of address or titles of position or office should be recorded as part of the name or as an addition.

9.2.2.24 Phrase Containing the Name of Another Person

We would like to note that the instruction given under 9.2.2.24 on recording the phrase in direct order seems to be unusual. We suggest following the academic practice, and recording the name of the other person, e.g. Aristoteles (*not* Pseudo-Aristoteles).

9.2.3 Variant Name for the Person

We would like to note that it should be possible to annotate the variant name form. We know annotations like "former name", "later name", "pseudonym" and "real name" in a standardized form as explanation for variant name form.

9.2.3.9 Alternative Linguistic Form of Name

We recommend adding codes for the transliteration schemes and original scripts.

9.2.3.10 Other Variant Name

We wonder whether all these examples are necessary as chapter 8 allows all kind of access points. But in view of an online tool it could be used as a collection of examples. But it seems that not all kinds of variant names are included. Otherwise the form "Koul, Pandit Anand" needs to be added to "Pandit Anand Koul" (page 60).

Is it right to record the part of surname "Bure" as a variant name for "Debure, Guillaume"? We would not have done that.

9.3 Date Associated with the Person

For the purpose of an international data exchange we suggest recording the date of birth and date of death in a standardized form dd-mm-jjjj (or jjjj-mm-dd) and not only for differentiation between two persons with the same name and year of birth. We would like to record the date associated with the person in any case if it is easily detected in the item in hand or the Internet.

9.3. – 9.16
We suggest labeling the identifying elements under 9.3-9.16 "attributes" or "separate elements". In 9.19. some of these elements are just named "additions" to the access points. We would like to have a clear statement here, saying that all identifying elements might be recorded either as attributes or as separate elements or as both. We want to record as many identifying elements as possible to clearly identify entities and to support navigation.

9.3.2 Date of Birth

9.3.2.3 Recording Date of Birth

We recommend using a language-independent way of recording the date of birth (ISO standard).

9.3.3 Date of Death

9.3.3.3 Recording Date of Death

A guideline to record the specific date of death analogous to 9.3.2.3 is missing and should be added.

We recommend using a language-independent way of recording the date of birth (ISO standard).

9.4 Title of the Person

The elements "titles of rank or office" and "titles of honor" mentioned in FRAD are missing.

9.4.1 Basic Instructions on Recording Titles of Persons

9.4.1.4 Titles of Royalty

9.4.1.4.1 Person with the Highest Royal Status Within a State, etc.
We suggest standardizing the title of royalty. Our suggestion (and current practice) is recording the elements in the following form: territory, title, numeration.

9.4.1.4.2 Consorts of Royal Persons
We wonder why there are already guidelines included in 9.4.1.4.2 on making relationships between persons when there are separate guidelines on related persons in chapter 30. Do we need these guidelines in here?

We wonder why a consort of a royal person should be recorded by his or her title followed by "consort of" instead of recording his real title, e.g. "Prince of the Netherlands" instead of "Prince, consort of Beatrix, Queen of the Netherlands".

9.4.1.4.3 Children and Grandchildren of Royal Persons
We wonder why there are already guidelines included in 9.4.1.4.2 on making relationships between persons when there are separate guidelines on related persons in chapter 30. Do we need these guidelines in here?

9.4.1.5 Titles of Nobility

There are no guidelines included indicating which title of nobility is recorded when there is more than one. Are all titles of nobility recorded or just the highest rank as it is mentioned in 9.4.1.4.1 and 9.4.1.7?

9.4.1.8 Other Persons of Religious Vocation

In our opinion the initials and/or abbreviations to a title of a person of religious vocation are not part of the name.

9.7 Gender

9.6 refers to "Other designations associated with a person". Do the rules under 9.7 ff. belong to this complex? In which cases should the biographical elements gender, place of birth, etc. be recorded?

9.10 Country Associated with the Person

We suggest recording the country in form of a code. We prefer ISO 3166-1 which is also used in the German authority files.

9.19 Constructing Access Points to Represent Persons

Please see our comments on 9.3.

On page 95 "More, Thomas, Saint" is given as an example. This does not correspond to the guideline and the same example given in 9.2.2.9.6 where the term *Saint* should not be included. This kind of inconsistencies should be avoided.

CHAPTER 10 IDENTIFYING FAMILIES

10.0 Purpose and Scope

The definitions of persons, families, and corporate bodies are given on a very abstract level and lack practical guidelines. We would appreciate some guidance on which subtypes belong to these entity types, e.g. whether fictitious characters, divinities or legendary figures are regarded as persons, and how families and corporate bodies are distinguished. When the name of an entity includes the word "family", is it clearly a family then, but not a corporate body?

Here are some examples for "families" which were treated as corporate bodies so far:
Kelly Family; **Sly and the Family Stone** family name, relatives, term for family
The Carpenters; **Jackson 5** family name, relatives, no term for family
Walker Brothers family name, no relatives, term for family

10.2 Name of the Family

10.3 Type of Family

10.3 – 10.9
We suggest that the identifying elements be labeled under 10.3-10.9 as "attributes" or "separate elements". In 10.10 some of these elements are just named "additions" to the access points. We would like to see a clear statement outlining that all identifying elements might be recorded either as attributes or as separate elements or as both. We wish to record as many identifying elements as possible to clearly identify entities and support navigation.

10.3.1 Basic Instructions on Recording Type of Family

10.3.1.3 Recording Type of Family

We suggest including definitions for these types of family in the glossary. Especially the differentiation between the types "family" (already included in the glossary), "clan", "royal house", and "dynasty" would be interesting. Concerning international data exchange, translations of terms in different languages should be accounted for.

Unambiguousness is important for data transfer and a definition or even a code might help to bring different language terms together. In any case the words "... or the equivalent in the language and script preferred by the agency creating the data" should be added.

10.4 Date Associated with the Family

The sentence "Indicate the source from which the dates were derived applying the instructions given under 8.12" as instructed here is missing in the equivalent chapters 9.3.1.3 and 11.4.1.3.

10.10 Constructing Access Points to Represent Families

Please see our comments on 10.3.

* CHAPTER 11 IDENTIFYING CORPORATE BODIES

The chapter as a whole appears unstructured and confusing. Most of the rules are ordered under chapter 11.2. We imagine that a structure according to the types of corporate bodies might be more helpful, as specific guidance for the specific types of bodies is often missing. We do not think that the rules in chapter 11 in this state are ready for application.

The guidelines in chapter 11 seem to be partly inconsistent with those in chapter 8 (especially concerning language and script) and contradictory. We require a clear general rule on how the corporate body should be recorded. We suggest that the many remaining specific case rules and all the remaining rules on punctuation and presentation formatting can be omitted.

Chapter 16 is still lacking rules for recording preferred access points for governments. But governments and government agencies represent a considerable part of our authority file for corporate bodies (and of our subject authority file as well), and rules for this part cannot be suspended after the first release.

* 11.0 Purpose and Scope

We appreciate that – compared with the last draft – an explanation is added about which types fall under the definition of corporate bodies. We are not convinced that all of the types listed really convey the idea of a corporate body, e.g. we would like to distinguish between vessels as a corporate entity and vessels as a vehicular entity (which techniques might be described, or between local churches as corporate entities and churches as buildings).

We would like to point out that most of the types of corporate bodies that belong to the group of "ambiguous entities" - e.g. tribes (ethnographic and/or corporate body as well), events (periods in time, actions and/or conferences) are used as subject terms with another comprehension and then belong to different classes of concepts. As these ambiguous entities have to follow the rules from both sides, when recording their preferred access points, their type should be recorded as a core element in order to label them explicitly.

We notice that governments, too, are classed with corporate bodies. We therefore expect that the preferred access points for governments follow the same rules as those for corporate bodies. As the instructions on access points for governments are given in chapter 16 (places), too, we expect that they follow the instructions on access points for places as well. We therefore suggest that the instructions on recording preferred access points for governments be placed in chapter 16, but to present them in chapter 11.

We would appreciate rules, especially those on corporate bodies, on how and in which cases the respective entities should be used as access points. We consider those application rules as essential for identifying the entity within the cataloguing process and within the catalogue. Without guidance on usage the metadata produced with RDA will not be interoperable. According to the present German rules, e.g. the works for which the executive body of a corporate body is responsible are not regarded as the works of the executive body, but as the works of the corporate body as a whole. According to this rule, executive bodies would not appear as access points in the catalogue. The background to this rule is that in most cases the executive body acts in the name of its superior body. Will it be left to application rules to decide how to catalogue in these cases?

11.1 General Guidelines on Identifying Corporate Bodies

11.1.1 Sources of Information

We recommend the consultation of authority files prior to resources, preferably those recording in the language and script common to the person, corporate body or family, as they already reflect

the names and forms used by the entities themselves or represented in the resources. We do not want to re-do work which has already be done.

Additionally, we propose to use as the source consulted next to the authority files the body's website as a prominent and mostly actual resource created and published by the body itself.

11.2 Name of the Corporate Body

11.2.1 Basic Instructions on Recording Names of Corporate Bodies

11.2.1.3 General Guidelines on Recording Names of Corporate Bodies

Please see our comments on modifications in names and titles on page 3.

11.2.2 Preferred Name for the Corporate Body

Chapter 11.2.2 appears unclear and confusing in its structure. The arrangement of subdivisions differs from that in the parallel chapters 9 and 10. The instructions on special types of corporate bodies seem imbalanced in specificity and depth. Some seem to be on the wrong structural level.

11.2.2.1 Scope

This wording of the second sentence – in our view – can or even must be interpreted such that the entity stays the same, as the formerly preferred name might be used as variant name to the new preferred name after the change of name (our subject authority file treats corporate bodies in that way). Is this really intended or shall the new name go with another identifier and other identifying elements for the body? As chapter 11.2 is very long it is hard in a continuous text to find the clue. We propose adding an appropriate explanation in 11.0 and/or link to 11.12.

11.2.2.2 Sources of Information

Please see our comments on 11.1.1.

11.2.2.3 Choosing the preferred name

According to 11.2.2.3, that name should be preferred by which the corporate body is commonly identified. This instruction differs from that in 8.2, 0.4.6.4, and 0.4.6.7. Please adjust the instruction in 11.2.2.3 or specify it for types (i.e. for governments and further exceptions).

11.2.2.4 Recording the Preferred Name

Please see our comments on 8.5.

We require rules describing in which script the preferred name should be recorded.

11.2.2.5 Different Forms of the Same Name

We suggest adding reliable authority files as a preferred source of information. Additionally, we suggest adding the corporate body's web site to the preferred sources of information. We regard the web site as a good source both for the actual name of the corporate body and for its history.

Please adjust this whole paragraph, too, to the main rules for persons, families, and corporate bodies. We consider clear general key rules which should be applied to all following chapters more meaningful than special guidelines for all imponderables which could occur during the recording of the main access points. As experience shows, special rules lead to additional exception rules and moreover to exceptions from exceptions. Instead of we recommend recording all common and

search relevant variants of names, spelling- and language forms of a name, of a title, or terms within an authority record as a variant name. This also applies in particular to corporate bodies.

11.2.2.5.1 Variant Spellings
Please see our question regarding „first resource received" in 6.2.2.4.

11.2.2.5.2 More than One Language Form of the Name
Please see our question regarding „first resource received" in 6.2.2.4.

11.2.2.5.3 International Bodies
Is 11.2.2.5.3 not also a case of "more than one language" in 11.2.2.5.2? The same applies to 11.2.2.5.4.

11.2.2.5.4 Conventional Name
The instruction in 11.2.2.5.4 to prefer – if there is one - the conventional name in the language of the body seems to be the main rule for choosing the preferred name of a corporate body. Regarding the citation form of a name of a corporate body, we agree, that with time often a conventional form emerges. This should be considered in the general rules for persons and families.

Exceptions
It seems that some of the special cases listed here appear again throughout the rest of chapter 11.2. We agree that the different types of corporate bodies have to be treated differently, especially those that shall be treated as governments rsp. places (patriarchates etc.) and ambiguous entities (local churches, religious societies which may also be regarded as generic terms etc.). We propose that the rules for these entities, their names, and data elements be treated in their own chapters.

Ancient and international bodies
The types of corporate bodies subsumed under this topic are very heterogeneous. There is no definition on "ancient body". Current and national corporate bodies should be added to the listed subtypes in the footnote. If the form in the language and script of the agency should be considered continuously, the deviation from the general rule is not understandable.

Autocephalous Patriarchates, Archdioceses, etc.
We agree with the treatment of patriarchates as governments. We require advice on how to record the preferred name and how to build the preferred access point. It should be given both in chapter 16 and in chapter 11. The examples imply that also historical forms of names can be recorded ("Constantinople" instead of "Istanbul").

Religious Orders and Societies
We note that the conventional designation for religious orders and societies are simultaneously the designation for the respected groups of persons in general. Regarding the given guidelines for religious orders and societies this would cause ambiguous entities. The distinction between orders and their members can be important in particular cases.

Governments
Compared with the last draft, the wording of this paragraph has changed. What is the reason for this change?

The language for territorial authorities are not mentioned here. As the same designators occur as well for geographical names we suggest using the name in the language preferred by the agency as the preferred name. The conventional name in the original language and script should be taken into account as a variant name. We require guidelines on how to record the preferred name and

how to construct the preferred access point. It should be given both in chapter 16 and in chapter 11.

Conferences, Congresses, Meetings, etc.
As conferences have a great affinity to works we suggest adopting the equivalent guidelines to determine the preferred name.

Local churches
In subject indexing, the name of the church, cathedral, etc. is used as a preferred access point in the numerous works on the architecture of churches and characteristics of the buildings. The name for the corporate body, i.e. the parish, parochial, congregation sometimes include the name of the church but even the conventional name is not the same. We would like to ask how the different entities are distinguished in Anglo-American subject headings. We see no advantage to use the same names for these different entities.

11.2.2.6 Change of Name

Chapter 32 treats related corporate bodies, not related names. Please see our comments on 11.2.2.1.

11.2.2.7 Names Consisting of or Containing Initials

Please see our comments on modifications in names and titles on page 3.

11.2.2.8 Initial Articles

Please see our comments on modifications in names and titles on page 3.

11.2.2.9 Citations of Honours

We strongly recommend that this rule be abandoned and that one refrain from omitting parts of the corporate body's name.

11.2.2.10 Terms Indicating Incorporation and Certain other Terms

We strongly recommend that this rule be abandoned and that one refrain from omitting parts of the body's name. We acknowledge that the legal form of a company is a very significant name component, too important to be ignored. Changes in the legal form often affect the body's character more than changes in the wording of the name. It should be part of the citation form for the corporate body.

11.2.2.11 Number or Year of Convocation of a Conference, etc.

We strongly recommend that this rule be abandoned and that one refrain from omitting parts of the corporate body's name. The fact that number, year, and place are added as identifying elements, ideally in a standardized form, should not mean that the name of the entity has to be truncated. The name might be searched by users including all these components. We also think that it is easier for the cataloguer not to be forced to think about whether or not to omit which parts of the name in which case. Number, frequency, and year should be additionally added as searchable identifying elements, irrespective of the wording of the name.

11.2.2.12 Transliteration

We do not understand why the instructions in chapter 11.2.2.12 do not correspond to those in 8.4 and those in 11.2.2.5.2. According to 8.4 names should be recorded in the language and script in which they appear on the sources from which they are taken, preferably in the language and script

of the content. The form in the language and script preferred by the agency creating the data is an alternative. Instructions on the preferred script for the preferred name should be added in 11.2.2.5.2. Therefore paragraph 11.2.2.12 could be omitted.

11.2.2.13 General Guidelines on Recording Names of Subordinate and Related Bodies

We suggest to use the wording of the Statement of International Cataloguing Principles instead of that in 11.2.2.13 and to follow these instructions in 11.2.2.14 - 11.2.2.16:
For the preferred access point for a corporate body, the preferred name should be given in direct order, as found in manifestations or reference sources, except:
- when the corporate body is part of a jurisdiction or territorial authority, the preferred access point should include the currently used form of the name of the territory concerned in the language and script best suited to the needs of the users of the catalogue;
- when the corporate name implies subordination, or subordinate function, or is insufficient to identify the subordinate body, the preferred access point should begin with the name of the superior body.

11.2.2.14 Subordinate and Related Bodies Recorded Subordinately

We strongly recommend that no parts of the name be omitted. Such rules lead to more and more exceptional rules. The mentioned types do not cover all specific cases. We recommend structuring the preferred name according to the general rule in 11.2.2.13 and to record the form not chosen (dependent and independent) continuously as a variant name in all cases of doubt.

11.2.2.17 Conventionalized Names for State and Local Units of United States Political Parties

We would welcome the recording of the preferred name of American political parties according to the general guidelines. Even users from abroad could search for literature from and about these parties.

11.2.2.18 General Guidelines on Recording Names of Government Bodies

We strongly recommend following the Statement of International Cataloguing principles and entering the preferred names of government bodies subordinately (see also our comment on 11.2.2.13). Please adjust the following paragraphs alike.

11.2.2.19 Government Bodies Recorded Subordinately

We would appreciate it if no parts of the name were omitted. Omitting leads to further exceptions and case laws. The mentioned types do not cover all specific cases. We recommend that the preferred name be structured according to the general rule in 11.2.2.18 and that the form not chosen be recorded (dependent and independent) continuously as a variant name in all cases of doubt.

11.2.2.20 Direct or indirect subdivision

Please see our comments on 11.2.2.18.

11.2.2.21 Government Officials

We would like to point out that the title of a person cannot be a part of the name of the government body. On the contrary the name of the body is taken or might be taken as the title of the person who is the incumbent of the office.
The term "preferred access point" is not correct in the context of 11.2.2.21, as the whole chapter 11.2.2 is meant to give instructions on how to record the preferred name of the corporate body.

We do not agree with the differentiation of single periods of incumbency of government officials. The "period of incumbency" and especially the "name of the person" are neither a part of the name of the corporate body nor are they listed as a core element in 8.3 or 11.3 – 11.6.

In our view, the incumbent of the office is a related person whose preferred access point should be recorded according to chapter 30.

We strongly recommend following the general rule on recording the preferred name of a government body, including the instructions on language and script, and a person related to that body.

The instruction that the preferred names of bodies of international intergovernmental organizations should be recorded following the same rules as for government bodies should be added in 11.2.2.13.

11.2.2.22 Legislative Bodies

The term "preferred access point" is not correct in the context of 11.2.2.21, as the whole chapter 11.2.2 is meant to give instructions on how to record the preferred name of the corporate body. We require an instruction on how to record the preferred name of the legislative body as a whole.

According to the current German rules, we are not used adding numbers and years to the name of a legislature, or the numbers and years of sessions. We are not convinced of the advantages of these rules.

11.2.2.23 Constitutional Conventions

We do not understand the exceptions for conventions convened by a jurisdiction using English as an official language. The general instructions on names of conferences in 11.2.2.5 should apply to the English-speaking jurisdictions alike.

11.2.2.24 Courts

We strongly recommend omitting no parts of the name. Omitting rules leads to further exceptions and case laws.

11.2.2.25 Armed Forces

We strongly recommend omitting no parts of the name. Omitting rules leads to further exceptions and case laws.

11.2.2.25.1 Armed Forces at the National Level
Please see our comments on numerals on page 3.

11.2.2.26 Embassies, Consulates, etc.

We propose recording the country respectively the city to which the body is accredited as a related corporate body. In systems with integrated authority files this would enable to search for the country's name with its variant names, too.

11.2.2.27 Delegations to International and Intergovernmental Bodies

We strongly recommend omitting no parts of the name. Omitting rules leads to further exceptions and case laws.

11.2.2.28 Councils, etc., of a Single Religious Body

The rules on recording the preferred name of subordinate units of a religious body shall follow the general rule in 11.2.2.13. Please compare our comment there on following the Statement of International Cataloguing Principles.

Please see our question regarding „first resource received" in 6.2.2.4.

11.2.2.29 Religious Officials

The rules on recording the preferred name of subordinate units of a religious body shall follow the general rule in 11.2.2.13. Please compare our comment there on following the Statement of International Cataloguing Principles.

11.2.2.29.1 Bishops, Rabbis, Mullahs, Patriarchs, etc.
See also our comment in 11.2.2.21

11.2.2.29.2 Popes
See also our comment in 11.2.2.21. We strongly recommend recording the incumbent as a related person.

11.2.2.30 Subordinate Bodies

The rules on recording the preferred name of subordinate units of a religious body shall follow the general rule in 11.2.2.13. Please compare our comment there on follow the Statement of International Cataloguing Principles.
We strongly recommend omitting no parts of the name. Omitting rules leads to further exceptions and case laws.

11.2.2.31 Papal Diplomatic Missions, etc.

We propose recording the country respectively the city to which the body is accredited as a related corporate body. In systems with integrated authority files this would enable searching for the country's name with its variant names, too.

11.2.3 Variant Name for the Corporate Body

11.2.3.3 General Guidelines on Recording Variant Names for Corporate Bodies

We recommend placing the first sentence of this paragraph also in the beginning of chapter 11.

11.2.3.6 Alternative Linguistic Form of Name

We suggest providing a relationship designator to those variant access points providing the name in original language and script and additionally adding an appropriate language code and script code.

11.3 Place Associated with the Corporate Body

We would like to point out that in most cases the preferred names of governments (rsp. jurisdictions) are equally used as place names and that thus the entities with these names belong to the group of ambiguous entities.

We suggest either building a preferred access point for territorial authorities and other geographical entities that are necessary to build a preferred access point for a corporate body respectively using already existing ones and recording the „place associated with the corporate body" as a related corporate body respectively related geographic entity. As there are already preferred access points

for territorial authorities and geographical names available in authority files, work which was already done could then be referred to. In systems with integrated authority files the advantage would be that the respective places could be searched and found with variant names and variant forms of the name.

11.3.2 Location of Conference, etc.

What exactly is meant by "if the conference is associated with more than one institution, etc. …"? Could this be the organizer, promoter, stadium? When should these exceptions be considered?

11.3.3 Location of Headquarters, etc.

11.3.3.4 Change of Name of Jurisdiction or Locality

Please see our comment on 11.3.

11.4 Date Associated with the Corporate Body

We suggest labeling the different relationships (date of foundation, date of termination, etc.) with a relationship designator.

11.4.1 Basic Instructions on Recording Dates Associated with Corporate Bodies

11.4.1.3 General Guidelines

The recording of dates associated with a corporate body should be harmonized according to the rules for persons and families.

11.5 Associated Institution

We suggest recording the associated institution as a related corporate body and using an appropriate relationship designator.

11.6 Other Designation Associated with the Corporate Body

11.6.1 Basic Instructions on Recording other Designations Associated with Corporate Bodies

11.6.1.5 Type of Jurisdiction

We propose recording the type of jurisdiction as a related concept, i.e. using the identifier or preferred access point of the appropriate generic term to represent the jurisdiction type.

11.6.1.6 Number of a Conference, etc.

What is covered by "etc."? We recommend adding at least one noun to have a better understanding.

Numbers of conferences should be recorded in any case and language independent.

11.7 Language of the Corporate Body

11.7.1 Basic Instructions on Recording Language of the Corporate Body

11.7.1.1 Scope

What is meant by "…a corporate body uses in its communications" exactly? The whole communication activities or only the publications of the corporate body?

11.12 Constructing Access Points to Represent Corporate Bodies

11.12.1 Preferred Access Point Representing a Corporate Body

11.3 – 11.11 do not instruct how to make additions to the name but provide guidelines on recording the elements that identify the corporate body.

We strongly recommend adjusting the rules for the construction of the preferred access point for corporate bodies to the general rule given in 0.6.4, which indicates that the identifying elements may be recorded either as additions to the preferred access point or as separate elements or as both.
We would like to point out that additions which are not held separately from the name are difficult to handle in data administration as all corrections, alignments and changes have to be done manually or have to be programmed for each single case.

11.12.1.3 Place Associated with the Body

Please see our comment on 11.3.

Are the abbreviations in the examples meant to provide links to the long form of the abbreviation or could these links be built?

11.12.1.4 Associated Institution

Please see our comment on 11.5.

11.12.1.5 Date Associated with the Body

Please see our comment on 11.4.

11.12.1.6 Type of Jurisdiction

Please see our comment on 11.6.1.5.

11.12.1.8 Number, Date, and Location of a Conference, etc.

Please see our comment on 11.6.1.6.

SECTION 4: RECORDING ATTRIBUTES OF CONCEPT, OBJECT, EVENT, AND PLACE

CHAPTER 16 IDENTIFYING PLACES

There was only minimal change in chapter 16. Therefore we are going to repeat our former comments on the last draft of RDA, Section 2-4 and 9.

* 16.0 Purpose and Scope

Purpose and scope of the chapter is limited as the use of subject is not yet included. A definition of the term "place" can only be found in the footnote. The wording is "Place, as used in this chapter, refers to a location identified by a name". We would prefer a clearer definition including that this entity place includes terrestrial and extra terrestrial locations, historical and pre-historical as well as contemporary and future locations, geographic features (mountains, lakes, rivers, oceans) and especially includes all kinds of geo-political jurisdictions (FRAD). The structure of chapter 16 strongly differs from that of the other chapters on recording entities, especially concerning the rules on recording the preferred name of the entity and the preferred access points. The latter are

entirely missing. The distinction made in chapter 16 between the names of jurisdictions and other place names cannot be maintained. Places and jurisdictions are ambiguous entities. They share the same name, the same geographic coordinates and, to a big extend, share meaning and definition. We therefore suggest placing the rules on choosing and recording the preferred names and on constructing the preferred access points for places including governments in chapter 16, but to display them likewise in chapter 11.

The guidelines in chapter 16, as given at the moment, do not include instructions on constructing preferred access points. Please notice that - as places of the type government appear as creators of works - it is indispensable that RDA provides rules on recording preferred names and on constructing preferred access points for places before the first release of RDA.

The guidelines on recording data identifying places (including governments) and specifying their core elements have to be consistent with the guidelines in the sections 2 and 3, and with the general guidelines given in the introduction. We therefore propose introducing to the introduction an additional chapter on "Recording Identifying Elements of Places".

We recommend adjusting the wording in 16.0 to that in 0.6.4: "The names of places are also used as additional identifying elements …". Please notice that we also propose to add "place of publication" as a core element for manifestations (cf. our comment on 0.6.2).

16.1 General Guidelines on Identifying Places

We recommend adjusting the structure and wording in chapter 16.1 to that in 8.1 in order to introduce definitions for access points and preferred access points for places.

16.2 Name of the Place

16.2.2 Preferred Name for the Place

16.2.2.1 Scope

We recommend adjusting the wording to that in 9.2.2.1: "The preferred name for the place is the name or form of name chosen as the basis for the preferred access point representing that place."

16.2.2.2 Sources of Information

We propose to use authority files as main source of information. In second place, we recommend to use the websites of jurisdictions and geographic databases.

16.2.2.3 Choosing the Preferred Name

Please add … in b) in the official language **and script** of the jurisdiction …

* 16.2.2.4 Recording the Preferred Name

We wonder why an identifying element (a related geographic entity) like the larger place or the jurisdiction to which the place belongs should be considered part of the name of the place. This is in contradiction to 11.2.1.5d where the conventional name of a government is defined as the name of the area over which the government exercises jurisdiction, without any indication that the name of the broader entity should be part of the name of the narrower one.
We strongly recommend omitting instructions to mingle the names of places with that of other places.

We recommend to use the element "place related" as a core element of the entity place.

We suggest adding authority files as a preferred source of information. We recommend recording variant forms of name as variant names.

16.2.2.7 Change of Name

The meaning of this chapter is not clear. We imagine that 16.2.2.7 should provide instructions in which cases a change of the name of the places indicates a change in the character of the entity.

16.2.2.8 Place Names for Jurisdictions

Please see our comments on 11.0.

16.2.2.8.1 Place Names that Include a Term Indicating Type of Jurisdiction
Please see our comment on 11.6.1.5.

16.2.2.9 Places in Australia, Canada, Malaysia, United States, U.S.S.R., or Yugoslavia

We do not understand the exceptions for explicitly these states. Could you please explain this? How should the rule for states, provinces, territories etc. in the former U.S.S.R. and the former Yugoslavia be interpreted as these states no longer exist. As mentioned in our comment on 16.2.2.4 the name of the larger jurisdiction is not part of the name of the smaller one, but may be recorded as an additional identifying element, a related place.

16.5 Identifier for the Place

Why is this chapter going to be added in a later release as it was already included in the former draft? As noted in our last comments, we suggest including the authority control number of the particular national authority file as a required element.

16.6 Constructing Access Points to Represent Places

16.6.1 Preferred Access Point for the Place

Guidelines for the preferred access point for the place are still missing.

SECTION 5: RECORDING PRIMARY RELATIONSHIPS BETWEEN WORK, EXPRESSION, MANIFESTATION, AND ITEM

CHAPTER 17 GENERAL GUIDELINES ON RECORDING PRIMARY RELATIONSHIPS BETWEEN A WORK, EXPRESSION, MANIFESTATION, AND ITEM

We recommend that more examples should be added. We suggest applying the term „relationship(s)" more often also in the subordinated chapters.

17.2 Functional Objectives and Principles

Is "find" really the only objective in this chapter? In former chapters other objectives like understand, differentiate, etc. were mentioned. We suggest adding "relate" as an objective.

17.3 Core Elements

There is an inconsistency between 17.3 and 17.4.1. In 17.3 the expression manifested is defined as a core element where 17.4.1 says "The relationship between a work and a manifestation that

embodies that work may also be recorded without identifying the expression through which the work is realized (see 17.7–17.8)".

17.4 Recording Primary Relationships

17.4.2 Conventions Used to Record Primary Relationships

17.4.2.3 Composite Description

Item should be mentioned in this paragraph as well.

The term "composite description" is new and should be defined in the glossary.

17.9 Manifestation of Expression

Where is the difference between 17.9 Manifestation of Expression and 17.12 Manifestation Exemplified? And analogous 17.5 Expression of Work and 17.10 Expression manifested. What exactly does that mean for cataloguing purposes?

17.11 Item of Manifestation

17.11.1 Basic Instructions on Recording an Item of the Manifestation

17.11.1.1 Scope

What exactly does the term "instance" mean here? Could you please point out an example for this case?

SECTION 6: RECORDING RELATIONSHIPS TO PERSONS, FAMILIES, AND CORPORATE BODIES ASSOCIATED WITH A RESOURCE

References to Appendix I and other chapters are missing. The references to the Appendix should link directly to the equivalent guideline.

CHAPTER 18 GENERAL GUIDELINES ON RECORDING RELATIONSHIPS TO PERSONS, FAMILIES, AND CORPORATE BODIES ASSOCIATED WITH A RESOURCE

18.1 Terminology

18.1.5 Access Point

Why are the definitions repeated again here?

The definition for "access point" does not match that in the glossary.

18.1.6 Relationship Designator

What does a relationship designator look like? The definition does not seem to be sufficient.

18.2 Functional Objectives and Principles

Please see our comment on 17.2.

18.5 Relationship Designator

<u>18.5.1 Basic Instructions on Recording Relationship Designators</u>

<u>18.5.1.3 Recording Relationship Designators</u>

The rule gives no instruction on whether the designators should be recorded reciprocally.

CHAPTER 19 PERSONS, FAMILIES, AND CORPORATE BODIES ASSOCIATED WITH A WORK

19.0 Purpose and Scope

The term "originating bodies" should be omitted here because it is covered by "creator". We assume that the term "originating body" was abandoned by the JSC. If not, it should be added to the glossary.

19.2 Creator

We recommend giving only 2-3 examples for each group of examples.

<u>19.2.1 Basic Instructions on Recording Creators</u>

Please see our comments on 11.2.2.21.

19.3 Other Person, Family, or Corporate Body Associated with a Work

This chapter should be formulated in a clearer way, especially as it covers a core element. It would be helpful to know which persons, families and corporate bodies should be considered. E.g. in the German speaking library community it is not the common usage to record the sponsoring body.

CHAPTER 20 PERSONS, FAMILIES, AND CORPORATE BODIES ASSOCIATED WITH AN EXPRESSION

20.2 Contributor

<u>20.2.1 Basic Instructions on Recording Contributors</u>

<u>20.2.1.3 Recording</u>

A reference to Appendix I.3 is missing.

CHAPTER 21 PERSONS, FAMILIES, AND CORPORATE BODIES ASSOCIATED WITH A MANIFESTATION

21.1 General Guidelines on Recording Persons, Families, and Corporate Bodies Associated with a Manifestation

A reference to Appendix I.4 is missing.

SECTION 7: RECORDING SUBJECT RELATIONSHIPS

CHAPTER 24 GENERAL GUIDELINES ON RECORDING RELATIONSHIPS BETWEEN WORKS, EXPRESSIONS, MANIFESTATIONS, AND ITEMS

Relationships exist only on one level. Diagonal relationships seem not to be covered by RDA in contrast to vertical and horizontal ones. A model of possible and required relationships and the relationships covered by RDA would be helpful. We also recommend a consistency check with chapter 17.4.

24.4 Recording Relationships Between Works, Expressions, Manifestations, and Items

24.4.1 Identifier for the Related Work, Expression, Manifestation, or Item

Using the ISSN as an identifier is not recommended for referencing related works as it is not explicit and could be recorded in different data records. A search via ISSN often leads to a number of hits. Using the URL as an identifier (like given in an example in 25.1.1.3) could also be problematic as it is changeable.

24.4.3 Description of the Related Work, Expression, Manifestation, or Item

The heading covers work, expression, manifestation, and item whereas the first sentence only refers to a related manifestation or item.

How should it be possible to find related works according to 24.2a) by giving an unstructured description like "Filmed with three other titles"?

24.5 Relationship Designator

24.5.1 Basic Instructions on Recording Relationship Designators

24.5.1.2 Sources of Information

This sentence seems to be incomplete. From which source should the information be taken?

CHAPTER 25 RELATED WORKS

25.1 Related Work

25.1.1 Basic Instructions on Referencing Related Works

25.1.1.3 Referencing Related Works

Please see also 24.4.1

25.2 Explanation of Relationship

Is there not a redundancy to the cataloguer's note?

CHAPTER 26 RELATED EXPRESSIONS

A reference to Appendix J would be helpful.

SECTION 9: RECORDING RELATIONSHIPS BETWEEN PERSONS, FAMILIES, AND CORPORATE BODIES

CHAPTER 29 GENERAL GUIDELINES ON RECORDING RELATIONSHIPS BETWEEN PERSONS, FAMILIES, AND CORPORATE BODIES

29.0 Purpose and Scope

Relationships should be recorded reciprocally.

29.1 Terminology

29.1.2 Person, Family, and Corporate Body

The definition of "person" as given here does not correspond to the definition given in 8.1.2. They need to be adjusted. In general we recommend giving definitions in one place in RDA.

29.1.4 Access Point

The definition of "access point" as given here does not correspond to the definition given in 8.1.4. They need to be adjusted. In general we recommend giving definitions in one place in RDA.

29.2 Functional Objectives and Principles

As we noted in former comments, we think that the objectives "find" and "understand" are not enough here.

CHAPTER 31 RELATED FAMILIES

We would appreciate some more examples for more different kinds of various relationships.

APPENDICES

Is it planned to update the appendices regularly?

The Appendices I, J, and K are not homogeneous.

A CAPITALIZATION

Please see our comments on modifications in names and titles on page 3.

A.39 German

The note "Government agencies in Germany are reconsidering aspects of the orthographic reform officially introduced on August 1, 1998." is out-of-date and should be deleted.

A.39.1 Nouns

In A.39.1 and A.39.2 the character "ß" is always represented by "ss". This does not correspond to our orthographic rules. The examples which are cited here only give a small extract of German orthographic conventions. A reference to the most current edition of the "Duden, Die Deutsche Rechtschreibung. Herausgegeben von der Dudenredaktion auf der Grundlage der neuen amtlichen Rechtschreibregeln. Ausgabe 24., völlig neu bearb. und erw. Aufl., 2006" would be more helpful than the small extract which does not cover all important orthographic cases.

<u>A.39.2 Proper Names and Their Derivatives</u>

Please see our comment on A.39.1.

<u>A.39.4 Miscellaneous</u>

Please see our comment on A.39.1.

B ABBREVIATIONS

B.2 Names of Persons, Families, Corporate Bodies, and Places

What does the abbreviation "Wm." under B.2a) stand for?

B.5 Other Elements

<u>B.5.9 Date</u>

As other countries use different phrases for the B.C. and A.D. dates we recommend that a sentence regarding the national agency be added.

B.7 Roman Alphabet Abbreviations

We suggest that the use of abbreviations in bibliographic records be omitted, unless they appear in the source of information itself.

There are the same abbreviations for different terms, e.g. "bd." for "band" and "bind".

The terms "alto", "baritone", "bass", "mezzo-soprano", "soprano", and "tenor" are abbreviations of voices. They should not be abbreviated analogous to musical instruments.

C INITIAL ARTICLES

Please see our comments on modifications in names and titles on page 3.

C.2 Articles Listed by Language

Please see our comments on modifications in names and titles on page 3.

D RECORD SYNTAXES FOR DESCRIPTIVE DATA

The numbering within Appendix D (D.3. – D.3.1. and D.4.) implies that there would be a further paragraph D.3.2. which will include the mapping from RDA to MARC 21. This will be an important tool. The existing mapping in D.3.1. from MARC 21 to RDA is incomplete so far: The updates numbers 8 (October 2007) and 9 (October 2008) are not considered yet.

D.3 MARC 21 Format for Bibliographic Data

<u>D.3.1 Mapping of MARC 21 Bibliographic to RDA</u>

The relation to MARC 856 is missing.

E RECORD SYNTAXES FOR ACCESS POINT CONTROL

The numbering within Appendix E (E.3. – E.3.1. and E.4.) implies that there would be a further paragraph E.3.2. which will include the mapping from RDA to MARC 21. This will be an important tool. The existing mapping in E.3.1. from MARC 21 to RDA is incomplete so far: The updates numbers 8 (October 2007) and 9 (October 2008) are not considered yet.

F ADDITIONAL INSTRUCTIONS ON NAMES OF PERSONS

Finnish and Russian is missing.

In general we would like to note that we do have much more detailed guidelines for the names from foreign language areas especially in view of Chinese, Indic, or Thai names. We would request, e.g. guidelines for Chinese religious names. The additional instructions in this chapter are too general.

F.2 Names in the Arabic Alphabet

F.2.1 Additional Instructions on Names in the Arabic Alphabet

F.2.1.4 Order of Parts

For "Kunyah" the wording of the definition is "typically a compound with *Abu* as the first word" but there are words beyond this like *Bō*, *Bū* (father of), or *Umm* (mother of). Examples for these words should be added as well.

There are also words instead of *Ibn* for a "Patronymic". E.g. *Ben*, *Bin* (son of), *Bint* (daughter of), and *Sibt* (grandchild of). There is also the possibility of more than one patronymic e.g. Sib.t-Ibn-al-`Ağamī.

G TITLES OF NOBILITY, TERMS OF RANK, ETC.

We suggest replacing the text under the point "Germany" with the following:

In Germany, titles of nobility were abolished in 1919. In cases of inheritable titles of nobility, the family members had the option to assume the term formerly considered to be the title of nobility as a component of their surname.

H DATES IN THE CHRISTIAN CALENDAR

H.1. B.C. and A.D. Dates

Please see our comment on B.5.9.

I RELATIONSHIP DESIGNATORS: RELATIONSHIPS BETWEEN A RESOURCE AND PERSONS, FAMILIES, AND CORPORATE BODIES ASSOCIATED WITH THE RESOURCE

I.4 Relationship Designators for Manifestations

I.4.2 Relationship Designators for Publishers

Why is only the "broadcaster" named as a relationship designator for publishers?

K RELATIONSHIP DESIGNATORS: RELATIONSHIPS BETWEEN PERSONS, FAMILIES, AND CORPORATE BODIES

What do the points behind the relationships mean? The relations should be sorted such that the reciprocal ones are listed behind each other.

"A collaborator" is named as an example for person-person-relationship in chapter 30.1.1.1. For this and some more possible cases there are no relationship designators in Appendix K.

Appendix K in combination with chapter 29 – chapter 31:
Relations for subject cataloguing as well as for relations between persons, families, and corporate bodies and concepts, objects, events, and places are missing. E.g.
- associative relations between persons, e.g. mythological figures like Merkur-Hermes
- associative relations between person and concepts, e.g. Aristoteles-Aristotelismus
- relations between person and objects, e.g. between artist and building
- hierarchical relations between corporate bodies and concepts (generic term for corporate bodies)
- hierarchical relations between corporate bodies and place+concepts (multipart generic term for corporate bodies consisting of geographical and subject term)

K.2 Relationship Designators for Related Persons

K.2.1 Relationship Designators to Relate Persons to Other Persons

Only the relation "pseudonym" – "real name" is given, others are missing.

M COMPLETE EXAMPLES

In general we note that the given MARC 21 examples do not reflect the current status of the MARC 21 format. The examples for work (7) and expression (2) are displayed in the MARC Authority format. Although this is the status quo, this practice should not be stipulated. In the future it should be possible to display work and expression in the MARC Bibliographic format and thereby also show these work and expression examples in the MARC Bibliographic format in Appendix M.

In general the examples are footnote centered and stress description in contrast to access. They also stress scenario 3 and scenario 2 in contrast to scenario 1. They should be designed in a more specific way.

According to 2.15 the identifier for the manifestation is a core element. But in the examples it is not consistently marked with an asterisk * (e.g. Book 1 in comparison to Book 2).

The examples do not indicate the levels work, expression, manifestation, and item; this would be helpful for the sake of clarity. The examples Work 1-7 and Expression 1-2 do not show relationships.

We would like to see Implementation Scenario 2 in the examples in Appendix M.

GLOSSARY

We noticed that there is no definition for "file type" given in the glossary.

The following terms should be included in the glossary:

- Diagram (3.4.2.2)

- Remote-sensing image (3.4.2.2)

- Painting (3.4.4)

- Photograph (3.4.4)

- Audio file (3.19.2.3)

- Data file (3.19.2.3)

- Image file (3.19.2.3)

- Program file (3.19.2.3)

- Text file (3.19.2.3)

- Video file (3.19.2.3)

- Official short title (6.20.4.2.2)

- Unofficial short title (6.20.4.2.2)

- Official title of the enactment (6.20.4.2.2)

- Clan (10.3.1.3)

- Royal house (10.3.1.3)

- Dynasty (10.3.1.3)

- Composite description (17.4.2.3)

- Mode of issuance (1.1.3)

- The indicator "fully established" and others should be added

- Fingerprint
  (our suggestion: The fingerprint is a group of characters derived from an early printed resource with the object of identifying the manifestation uniquely. The fingerprint system has been considered as a substitute for the standard number for older publications. The fingerprint consists of a number of characters drawn from a number of uniform places in the text, followed by a number indicating the source of one or more of the characters, the date as it appears on the source of information, a statement whether the year is printed in Roman or Arabic numerals or in another form, and the number of the volume, if applicable.)

- Ancient body (11.2.2.5.4)

- International body (11.2.2.5.4)

- Compilation

- Compilator vs. Editor

COMMENTS ON EXAMPLES IN INSTRUCTION NUMBER ORDER

2.3.11.4 Devised Titles for Music

We suggest omitting the last example "Heft. Erster Verlust" as it is not clear.

2.4.1.7 Clarification of Role

Our colleagues from the German Music Archive had a look at the CD-ROM:

On the CD-Rom itself one can find the following text:

Juan Ramón Jiménez

Mario Castelnuovo-Tedesco

Platero und ich - and I

At the back of the container (jewel case) one can find the following text:

Juan Ramón Jiménez

Platero und ich - Andalusische Elegie. Platero and I - Andalusian Elegy

Musik von - Music by Mario Castelnuovo-Tedesco

Was this CD-ROM the item used for formulating the example? If so, why was „[Musick von]" added in square brackets?

2.5.1.4 Recording Edition Statements

The example „second edition" contradicts the guideline in 1.8.5

2.5.2.3 Recording Designations of Edition

The spelling of the example "Klavierauszug zu 2 hönden mit Singstimme und Text" has an error. "Klavierauszug zu 2 **H**änden mit Singstimme und Text" would be right.

3.1.4 Resources Consisting of More Than One Carrier

We like to note that the examples are not clearly arranged.

3.4.2.2 Recording Extent of a Cartographic Resource

In view of the example "52 playing card" on page 28 we were wondering if playing cards should really be used in the sense of "cartographic content".

5.8.1.3 Recording Sources Consulted

In view of the third example on page 7 "Pacheco, Cristina. La luz de México, 1988 series title page:" we wonder whether there is something missing behind the colon or not.

6.2.2.5 Works Created Before 1501

We recommend adding the sources of information in the given examples.

6.23.2.8 Liturgical Works

The example "Missal" does not correspond to the given guideline. For "Missale ad usum insignis Ecclisi[a]e Sarum" the Tridentine title would be "Missal**e**".

7.7.1.3 Recording the Intended Audience

As the examples only reflect the MPAA (USA) and BBFC (GB) we suggest including an example for FSK (Germany):

"FSK ab 12 freigegeben"

9.2.2.5.3 Names Written in a Non-Preferred Script

The examples on Hebrew and Arabic names on page 10/11 are written backwards.

9.2.2.14 General Guidelines on Recording Names Containing a Title of Nobility

Please see our comments on Appendix G.

We suggest that the example "Dönhoff, Marion, Gräfin" be deleted. We omitted the title of nobility "Gräfin" in our German authority file for personal names.

Furthermore we suggest that the example "Dalberg, Emmerich-Joseph, Herzog von" be deleted. In the German authority file for personal names we omitted the title of nobility "Herzog".

9.2.3.9 Alternative Linguistic Form of Name

The examples on Hebrew and Arabic names on page 52 are written backwards.

9.2.2.13 Surnames of Members of Royal Houses

We suggest that the examples be corrected in the following way:
Habsburg, Otto **von**
Hohenzollern, Friedrich Viktor **von**
Wied, Maximilian **zu**

11.2.2.10 Terms Indicating Incorporation and Certain other Terms

The sentence "Omit an adjectival term or abbreviation indicating incorporation (e.g. Incorporated, E.V., Ltd.) or state…" has an error. "Omit an adjectival term or abbreviation indicating incorporation (e.g. Incorporated, **e**.V., Ltd.) or state…" would be right.

The second example has an error. The term indicating incorporation is missing (Automobiltechnische Gesellschaft e.V. not: Automobiltechnische Gesellschaft).

11.2.2.14 Subordinate and Related Bodies Recorded Subordinately

Type 2
On page 26 there are some examples to illustrate exceptions to the basic instruction ("ACS Office of Statistical Services, …"). We do not understand, which rule the examples should follow. We suggest making this explicit.

Type 3
We wonder about the last examples "Human Resources Center" and "Research and Training Institute". Why do they illustrate a case of doubt? Since no higher body is called, we do not consider recording the bodies as subordinated.

11.5.1.3 Recording Associated Institutions

We recommend adding examples for an associated institution for conferences, etc.

17.5.1.3 Recording an Expression of a Work

The example „BA 4700" stands for the article number of one special publisher called "Bärenreiter-Verlag". This makes "BA 4700" an identifier for a manifestation and not for an expression. The example therefore seems to be faulty.

17.10.1.3 Recording an Expression Manifested

The example „BA 4700" stands for the article number of one special publisher called "Bärenreiter-Verlag". This makes "BA 4700" an identifier for a manifestation and not for an expression. The example therefore seems to be faulty.

19.2.1.3 Recording Creators

Regarding the examples given under "Two or More Persons, Families, or Corporate Bodies Responsible for the Creation of the Work Performing the Same Role" we would recommend also giving also examples which reflect the general guideline for the core element to record only the creator having principal responsibility if there is more than one creator as instructed under 19.2

24.6.1.3 Recording Number of Parts

The layout of the last example "v. 3-5, 11-12" is absent.

A.3.1 General Guideline

"De bellow Gallico" is not correct. "De bello Gallico" would be right.

A.4.3 Titles of Works that Have Merged or Been Absorbed

The two titles "Farm chemicals" and "Crop life" are connected with the word "and". The second title should be recorded with lowercase character. 2.3.2.7 references to 2.3.1.4 where the given form should be used. Why not here?

TYPOGRAPHICAL ERRORS (OTHER THAN IN EXAMPLES) IN INSTRUCTION NUMBER ORDER

1.6.1.1 Change in Mode of Issuance of a Multipart Monograph

The reference to 2.14 is not correct. 2.13 would be right.

1.6.3 Integrating Resources

The reference to 2.14 is not correct. 2.13 would be right.

2.4.1 Basic Instructions on Recording Statements of Responsibility

The reference to 7.20 is not correct. 7.23 would be right.

2.7.2.7 Change in Place of Production

The reference to 2.7.2.5. is not correct. 2.7.1.5 would be right.

2.7.4.8 Change in Producer's Name

The reference to 2.7.2.5. is not correct. 2.7.1.5 would be right.

2.8.2.7 Change in Place of Publication

The reference to 2.8.2.5. is not correct. 2.8.1.5 would be right.

2.8.4.8 Change in Publisher's Name

The reference to 2.8.2.5. is not correct. 2.8.1.5 would be right.

2.8.6.6 Date of Publication Not Identified in the Resource

The RDA symbol is missing behind the reference 2.7.6.

2.9.2.7 Change in Place of Distribution

The reference to 2.9.2.5. is not correct. 2.9.1.5 would be right.

3.3.1.2 Recording Carrier Type

There should be no space before "audio cartridge".

5.1.4 Access Point

The sentence "The terms *point, preferred access point,*and*variant access point*are use d as follows:" is not correct. "The terms **access** *point, preferred access point*, **and** *variant* *access* ***point*** **are** used as follows:" would be right.

5.2 Functional objectives and principles

The layout of subsection a) is not correct. "*find* works and expressions that …" is correct.

6.2.2.10.2 Two or More Parts
Please omit the second "two" in the first sentence in the alternative guideline on page 23. "When identifying two or more unnumbered …" would be right.

6.2.2.11 Recording the Preferred Title for a Compilation of Works

The references 6.2.2.14-6.2.2.16 are not correct. 6.2.2.11.1 – 6.2.2.11.2 would be right.

The reference to 6.2.2.16. in the last paragraph is not correct. 6.2.2.11.3 would be right.

6.2.2.11.3 Other Compilations of Two or More Works
The references 6.2.1.14 and 6.2.1.15 are not correct. 6.2.2.11.1 and 6.2.2.11.2 would be right.

6.20.1 Scope

The reference 6.16.2 is not correct. 6.20.4 would be right.

The reference 6.16.3 is not correct. 6.20.5 would be right.

6.20.2 Sources of Information

The reference 6.16.2.2 is not correct. 6.20.4.1.2 would be right.

6.21.1 Basic Instructions on Recording Date of Work

The reference in footnote 19 to Appendix J is not correct. Appendix H would be right.

6.26.1.3 General Guidelines on Recording Titles of Religious Works

This chapter should be called "General Guidelines on Recording Titles of Official Communications".

6.27.1.4 Compilations of Works by Different Persons, Families, or Corporate Bodies
The reference on page 150 6.15.2 is not correct.

6.27.1.5 Adaptations and Revisions

The reference 6.15.2 is not correct.

7.9.1.3 Recording Dissertation or Thesis Information

The reference under a) 7.21 is not correct. 7.9.2 could be right.

7.12.1.1 Scope
The reference 3.21 is not correct.

7.17.1.3 Recording Colour Content

The reference 7.17.1.5 is not correct. 7.17.2 would be right.

The reference 7.17.1.6 is not correct. 7.17.3 would be right.

The reference 7.17.1.7 is not correct. 7.17.4 would be right.

The reference 7.17.1.8 is not correct. 7.17.5 would be right.

8.1.1 Explanation of Key Terms
The reference 8.1.3-8.1.4 is not correct. 8.1.2-8.1.4 would be right.

8.3 Core Elements

The reference 8.1.3 is not correct. 8.11.1.3 would be right.

8.5.1 General Guidelines

The reference 8.5.3-8.5.7 is not correct. 8.5.2-8.5.7 would be right.

8.10.1.3 Recording the Status of the Preferred Access Point

This chapter should be called "Recording the Status **of Identification** of the Preferred Access Point"

8.10.1.2 Sources of Information

The sentence "Take information on the status of identification point form any source" is not correct. "Take information on the status of identification form any source" would be right.

8.12 Source Consulted

This chapter should be called "Source**s** Consulted".

9.0 Purpose and Scope

The references F.1-F.11 are not correct. F.2-F.12 would be right.

The text before the reference to F.12 needs to be changed into "Recording surnames that include an article and/or preposition".

9.2.2.3 Choosing The Preferred Name

Is the reference to 9.2.2-9.2.2.8 at the top of page 4 correct or should it be 9.2.2.5-9.2.2.6?

9.2.2.11.1 Articles and Prepositions
The references F.11.1-F.11.11 are not correct. F.12.1-F.12.11 would be right. We recommend proof reading all references from page 31 to Appendix F as they do not correspond to each other.

9.2.2.9 General Guidelines on Recording Names Containing a Surname

The reference 9.2.1.14 is not correct. 9.2.2.14 would be right.

9.2.2.10 Compound Surnames

The reference 9.2.1.9 does not exist.

9.2.2.14 General Guidelines on Recording Names Containing a Title of Nobility

The reference 9.2.1.14 is not correct. 9.2.2.14 would be right.

9.2.3.5 Secular Name

The first sentence "If the name chosen as the preferred name for a person is the person's secular name, record the name used by that person in religion as a variant name." is not correct. It should read "If the name chosen as the preferred name for a person is the **name used by that person in religion**, record the **person's secular name** as a variant name."

11.2.2.4 Recording the Preferred Name

The references 11.2.1.7 - 11.2.1.27 are not correct. 11.2.2.7 - 11.2.2.27 would be right.

The reference to the instructions on recording the names of religious bodies is missing. Please insert the reference at the end of chapter 11.2.2.4: "For instructions on recording the names of religious bodies, see 11.2.2.28 - 11.2.2.31 RDA."

11.2.2.5.4 Conventional Name
Regarding the footnote 2 on page 10: Please change the footnote to "… in **the language preferred by the agency creating the data** as the preferred name".

11.2.2.11 Number or Year of Convocation of a Conference, etc.

The reference 11.2.1.13.2 is not correct. 11.2.2.14 would be right.

11.2.2.13 General guidelines on Recording Names of Subordinate and Related Bodies

References are missing in the paragraph "Exceptions".

The last sentence "Record the name in form of a subdivision ..." is not part of the exception. This instruction should be moved to the basic instructions.

11.2.2.16 Joint Committees, Commissions, etc.

The reference 11.2.0 is not correct.

11.2.2.18 General Guidelines on Recording Names of Government Bodies

The reference 11.2.1.4 is not correct.

11.2.2.20 Direct or Indirect Subdivision

The reference 11.2.1.19 is not correct. 11.2.2.19 would be right.

11.2.2.21.2 Heads of Governments
The first sentence of the last paragraph on page 45 should be corrected as follows: "If the official **being** identified is a specific incumbent of the office, add, in parentheses, the inclusive years of the incumbency and the name of the person in a brief form and in the language of the preferred name for that person."

11.2.2.21.4 Governors of Dependent or Occupied Territories

The reference 11.2.1.1c is not correct. 11.2.2.14 would be right.

11.2.3 Variant Name for the Corporate Body

The sentence "A variant name for the corporate body is a name ..." duplicates the content of 11.2.3.1. Please delete the text preceding 11.2.3.1.

11.2.3.3 General Guidelines on Recording Variant Names for Corporate Bodies

The reference 8.5 is not correct. 8.7 would be right.

11.3.3.1 Scope
The last sentence should be corrected as follows: "For instructions on recording **an** institution associated with a corporate body, see **11.5** RDA."

11.4.1.3 General Guidelines

This chapter should be called "Recording Dates Associated with Corporate Bodies".

11.5.1.2 Sources of Information

The sentence "Take information on assiciated institutions…" is not correct. "Take information on associated institutions…" would be right.

11.6 Other Designation Associated with the Corporate Body

The second sentence duplicates the content of the first sentence (except: missing of references). Please delete the second sentence.

16.2.1.3 General Guidelines on Recording Names of Places

The reference 16.2.1.8-16.2.1.13 is not correct. 16.2.2.8-16.2.2.13 would be right.

16.2.2.3 Choosing the Preferred Name

The references 16.2.1.6 and 16.2.1.7 are not correct. 16.2.2.6 and 16.2.2.7 would be right.

16.2.2.9.2 Other Places
The reference 16.2.1.4 is not correct. 16.2.2.4 would be right.

30.1.1.3 Referencing a Related Person

The references 30.1.1.3a and 30.1.1.3b are not correct. 30.1.1.3.1 and 30.1.1.3.2 would be right.

A.33.1 Proper Names and Their Derivatives

"Do not apitalize names of peoples,…" is not correct. "Do not capitalize names of peoples,…" would be right.

A.39.1 Nouns

"ausser Acht lassen" is not correct. "außer Acht lassen" would be right.

A.39.2 Proper Names and Their Derivatives

"Alexander der Grosse" is not correct. " Alexander der Große " would be right.

C.1 General Instructions

The reference 9.2.22.2 is not correct. This paragraph does not exist.

M complete examples

Book 1 (page 9): the reference to 3.2 regarding carrier type is not correct. 3.3 would be right.
Book 2 (page 13): 7.16 "Supplemeary content" is not correct. "Supplementary content" would be right.
Streaming Video (page 21): 7.22 "Durantion" is not correct. "Duration" would be right.
Personal Name 7 (page 48/49): 9.2.3 and 8.12 "Benoôt XVI" is not correct. "Benoît XVI" would be right.

Expression 2 (page 105): 5.7 "ully established" is not correct. "fully established" would be right.

6.10 Content type

RDA Content type	ISBD Content form	ISBD Content qualification
cartographic dataset	dataset	cartographic
cartographic image	image	cartographic still
cartographic moving image	image	cartographic moving
cartographic tactile image	image	cartographic tactile
cartographic tactile three-dimensional form	object	cartographic tactile
cartographic three-dimensional form	object	cartographic
computer dataset	dataset	
computer program	program	
notated movement	movement	notated
notated music	music	notated
performed music	music	performed
sounds	sound	
spoken word	spoken word	
still image	image	still
tactile image	image	tactile
tactile music	music	tactile
tactile notated movement	music	notated tactile
tactile text	text	tactile
tactile three-dimensional form	object	tactile 3-dimensional
text	text	
three-dimensional form	object	3-dimensional
three-dimensional moving image	image	3-dimensional moving
two-dimensional moving image	image	2-dimensional moving