ACOC thanks ALA for this thorough investigation of the possibilities for making Chapter 3 data elements machine-actionable, and appreciates their efforts to further develop the Aspect-Unit-Quantity model introduced in ALA/17 (2012) and ALA/Discussion/1 (2013).

However, ACOC is dismayed by the complexity of the approach outlined in this paper. Not only does it appear more like a proposal than a discussion paper, but the proposed solution is far more complex than we had hoped to see following on from previous discussions. ACOC is of the view that a better balance needs to be struck between satisfying machine-actionability of data and usability of the RDA instructions for the everyday cataloguer.

ACOC notes that there is no mention of leveraging existing online publisher data as a starting point for recording Chapter 3 elements (e.g. ONIX). Perhaps this was an underlying assumption, but because it was not clearly stated, both the discussion and the proposed revisions to RDA read as though all of the required data will be manually entered by cataloguers. A clear acknowledgement of the role of existing online data in the data supply chain, may lead to a much simpler set of instructions.

ACOC also had difficulty responding to a number of the questions relating to revisions to the RDA instructions. As these revisions appear to represent a significant re-organisation of Chapter 3, it is difficult to respond without having seen the FR consolidation.

Finally, although the paper “recognises the clear need for machine-actionability”, ACOC remains unconvinced of the case for machine-actionability of the elements covered in this paper. As stated in our response to ALA/17, we are unsure that the benefit of implementing such a wide-ranging change is commensurate with the degree of effort that would be involved. Is there scope for JSC to commission a separate body of work to prepare a detailed business case for creation of machine-actionable data, and a road for prioritising this work?

Bearing in mind the above broader issues, ACOC provides the following best guess responses to the questions on Page 8 of the discussion paper.

1. **Should RDA contain a super property for Measurement which may apply to all WEMI entities.**

   ACOC is uneasy about answering this while the FR consolidation is still to be completed. We are not sure whether and how super properties will be accommodated in the model.

   a. **Should RDA contain a two-path approach, for both machine- and human-generated data.**

   ACOC is unsure how to answer this question as it appears to have confused human-readable data and human-generated data. ACOC understands that the issue is the need for both machine-actionable and human-readable data, and believe that both aims can be addressed with one set of
instructions, and the use of effective encoding schema. Taking a “two-path” approach to generating the data is an unnecessary complication.

2. **Should the instructions for Extent (of the Carrier) be refocused to treat volumes and their subunits in the same manner as other carriers?**

   The proposed refocusing of Extent (of the Carrier) relies on a new approach to pagination and foliation. While the case for revising the treatment of extent of carrier for volumes may have merit, ACOC would prefer to evaluate this question in light of FR consolidation outcomes and a final version of the FRBR-LRM.

3. **Should a separate set of instructions be developed for Pagination and foliation? If so, should they be placed in Chapter 2 or Chapter 3?**

   Again, ACOC would prefer to see the final FR Consolidation model before answering this question. However, if there are a separate set of instructions developed, we think they should be placed in Chapter 3, as a sub-element of Extent.

4. **For recording the dimensions of still images and cartographic resources, should the distinction between the dimensions of the sheet and the pictorial area be made using values for Part Measured? Or should the dimensions of the pictorial area be treated as an attribute of content (in Chapter 7)?**

   Again, ACOC would prefer to see the final FR Consolidation model before answering this question. However, ACOC is cautious about ‘scattering’ elements through RDA.

5. **When should Extent of the Content be core?**

   ACOC would prefer a general review of what elements should be core after the release of the FRBR-LRM. The ‘coreness’ of this element should be assessed in light of the ease of data entry and even whether it may be possible to ‘value add’ to publisher supplied data.

   **a. Does it make sense to move Units and Sets of Units with Identical Content (currently RDA 3.4.1.6) to Chapter 7?**

   ACOC is cautious about ‘scattering’ extent elements through RDA. Even though this is for machine-actionable data the ease of use by the cataloguer of RDA also needs to be taken into consideration. This question may be answered after the review of RDA in relation to the FRBR-LRM and any changes suggested by the consolidation.

   **b. Should a term other than “item” be used in these instructions? If so, what should it be?**

   ACOC would prefer WEMI terms to be used in the context of the FRBR-LRM definitions but acknowledges that the English language is not always so clear cut. Perhaps ‘components’ may be a better word as ‘items’ has more of a carrier connotation.

6. **Should the instructions for Duration make a distinction between the actual duration (for resources with a temporal dimension) and the intended duration (for resources with a stated performance time)?**
ACOC’s understanding is that actual duration can only apply to a Manifestation and intended duration can only apply to an Expression or maybe Work. Does JSC agree with this understanding? If so, then a distinction should certainly be made.

7. **Is the syntax used for subelements in the examples acceptable? Is there a better way to present the examples?**

ACOC does appreciate the clarity of how the examples are presented allowing users of RDA to clearly understand what the separate sub-elements are, however, they do take up a lot of ‘real estate’. Given our comments above we are unsure about having both sub-element and string examples. At this point in time we do not have any suggestions for alternative ways to present the examples. We would be interested in the views of the Examples Editor.

8. **How great is the concern about the ability to migrate legacy data to the new structure?**

The ability to migrate legacy data is significantly concerning, as it is difficult to see how it can be easily done as an automated process. However, ACOC’s view is that legacy data is an issue with any significant change to cataloguing standards and should not be a deciding factor in implementing change. Our experience with the move from manual to automated cataloguing was that solutions for legacy data in printed catalogues emerged as technology evolved, and we are of the view that this will continue to be the case as we implement changes to the way we create online data.