

To: Joint Steering Committee for Revision of AACR

From: Jennifer Bowen, ALA representative

Subject: Draft of Part 1 of RDA

ALA acknowledges the significant step forward that has been made with the current draft of part 1 of RDA over the draft of part 1 of AACR3 from December 2004. The change of direction undertaken last year by the JSC has resulted in a document that is closer to what we envision for a standard that will move us forward, while still striving to retain the principles and carefully-constructed practices that the JSC and its constituencies have developed over the years. While much progress has been made, there continues to be a wide divergence of opinion within ALA about the success of this draft of RDA. A few ALA members feel that the draft represents too radical a step forward (especially regarding transcription and moving away from the ISBDs), but others are calling for more extensive changes and even a second delay in the implementation schedule to accommodate a more thorough re-conception of RDA from the ground up.

Taking these various view into account, however, ALA continues to support moving forward with work on RDA using the current draft of part 1 as a basis for the first part of the new code, and to move forward with the remaining parts of RDA as much as possible within the established timeline. However, ALA feels that there is still a need for considerable work on part 1 (a) to create guidelines that are flexible enough to be used by a variety of communities; (b) to implement fully some of the decisions that the JSC has made regarding separation of content from presentation; and (c) to address some of the consequences of that decision as effectively as possible.

Nature of Constituency Comments and their Review

As always, ALA members took the opportunity to review the draft of part 1 very seriously. Members of CC:DA and groups represented by CC:DA contributed over 400 pages of meticulous comments on all aspects of the draft. In addition, ALA received 70 pages of comments from others outside of CC:DA through the use of a web form for comments. ALA feels strongly that if the majority of these comments were incorporated into RDA that the document would be a much easier-to-use, coherent, and consistent standard. However, given the time constraints on the preparation of the constituency responses, and the time constraints on the JSC for actually reviewing the comments on part 1, it is clear that only a very small percentage of our comments will have any chance of being incorporated into RDA. Given that significant constraint, this response includes ALA's most substantive comments and those that we assess will potentially affect the usability of the document, especially for digital materials.

The huge gap between the number of comments made on the draft, and the ability of the JSC and the Editorial Team to incorporate them, point to a critical need to find a better process for review of comments on the drafts of RDA. A new mechanism must be found to ensure that a larger percentage of the comments on part 1 have some opportunity for inclusion within RDA without being developed into individual proposals to revise RDA after it is published. The process of writing these proposals may just delay the problem, as the JSC could be inundated with many revision proposals that (again) could not be considered within a timely manner.

To address this problem, ALA suggests that the JSC empower an international group (using the JSC Examples Group as a model) to do initial triage on the comments on part 1. This triage group could start with the response table that will be created from the current round of comments on part 1 (after initial JSC discussion of the responses at the JSC April meeting), thus freeing the JSC and the Editor to concentrate on parts 2 and 3. The triage group could also revisit unresolved comments on the response table from last year's review of the draft of AACR3 part 1, and also possibly consider additional detailed comments from the constituencies that could not be included in the current round of responses. The group's recommendations could then be considered for inclusion in part 1 of RDA, both prior to publication in 2008 (for the highest-priority changes) and, for the others, for inclusion in the first revision packet.

ALA intends to continue discussing several additional issues that we identified during our review of part 1 that are not included in this document, and will bring forward those that we see as the highest priority as new proposals for JSC consideration. However, we would welcome the creation of the additional mechanism described above for continued consideration of part 1 issues. Such a process would reassure everyone who commented on the draft of part 1 that the huge amount of work that went into the review will not be wasted because of an adherence to a publication schedule for RDA that many feel is too rushed, and mostly driven by economics.

ALA's review of part 1 produced several recommendations for additions and changes to the RDA Glossary. Because a revised glossary was not issued with the draft of part 1, ALA plans to submit a list of our recommended changes to the glossary to the JSC as a separate document, rather than including the list in our response to the draft of part 1.

As the ALA representative to the JSC, I am very indebted to the work of CC:DA and all of its members for their thoughtful and careful consideration of the draft of part 1 and for their assistance in preparing this response.

This response is organized into the following general sections:

Introduction

General Comments on:

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 - a) Feasibility of a universal standard
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2. RDA Structural Issues
 - a) Arrangement of chapters
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 - e) Notes vs. other data elements
 - f) "Statements"
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3. RDA Formatting, Wording Conventions, etc.
 - a) Format of text
 - b) Format of guidelines
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Specific Comments [arranged by chapter and rule number]

Appendix A: Comments from the IEEE LOM liaison to CC:DA

Appendix B: RDA High-level Elements

General Comments

In general, ALA is somewhat concerned that the draft of part 1 is still too centered on printed text and resources in the West European/North American publishing tradition, as we will point out below in our more specific comments. Text can be indexed and searched relatively well in digital form, compared with musical sound recordings, moving image materials, photographs, etc. Therefore, it may not be enough for RDA to strive for neutrality of treatment of all formats and types of content; we may need to consider putting even more effort into those types of resources that are more difficult for users to find, even in a digital form.

1. Usability of RDA by Other Communities

1a. Feasibility of a universal standard

The current draft of part 1 of RDA has moved significantly in the direction of being a standard that is potentially usable by metadata communities other than the library community. However, ALA believes that we have not yet met the needs of other metadata communities, and that significant work is still needed in this area.

On the one hand, significant portions of RDA provide guidelines well above and beyond what is needed for such metadata schemas as Dublin Core, and present guidelines that are still not fully appropriate for digital resources. The continued reliance upon transcription in RDA will likely reduce its wider utilization in metadata communities. On the other hand, if additional simplification and streamlining of the guidelines takes place (especially regarding transcription), there is a significant risk of jeopardizing some functionality that is very necessary for libraries, such as record matching and authority work (we will address examples of this more specifically as we comment on specific guidelines, such as 2.4.0.3). We are also concerned that adding additional options to satisfy all communities will have a significant negative impact on the goal of consistency at the international level. We must avoid ending up with an “unhappy medium” that does not fully address the needs of any community!

One suggestion offered by ALA members after seeing the demo of the prototype of the online RDA was the development of “application profiles” for both metadata and library communities, where certain guidelines and options are tagged as being applicable to one community or another. Such functionality could easily be incorporated into the online product, and could be made to work in the printed version of RDA as well. Such an approach, however, would emphasize a distinction between the two communities that in reality is rather indistinct, and will become more indistinct in the future, as libraries apply RDA to their own metadata collections and begin to consider library cataloguing operations as just one type of metadata creation. Whether or not the concept of application profiles is seen as appropriate for inclusion within RDA itself, however, ALA notes that the idea of application profiles is not likely to go away, as agencies responsible for developing policies (e.g. the bibliographic utilities, national libraries, special projects) may develop RDA application profiles of their own at some point in the future, which could be linked to from within the RDA product in the future.

Another option suggested during the ALA review would be to provide additional guidance within the text of RDA. When options are provided for various environments, the guidelines in RDA could briefly explain the appropriateness of various options in various situations. Such guidance would not have to be more than a well-placed sentence or two, or eventually a link out to a longer “application profile” document as described in the previous paragraph. Within our comments on specific guidelines within part 1, we will suggest possible places where such additional guidance might be useful. In general, ALA would support the inclusion of additional guidance within RDA regarding the

rationale for a particular guideline. Such additional guidance would be very useful to non-library communities to understand why RDA specifies certain practices, and could be strategically placed within RDA so that it is not extensive and does not turn RDA into a “textbook”.

A third alternative, which we urge the JSC to consider seriously, would be for the JSC to pursue the development of **two** RDA standards: a very high-level document (which we’ll refer to for now as “RDA-Lite”) that contains only the pure rules for content. RDA-Lite would have as its primary focus the description of and access to such resources as are more prevalently described by non-*AACR* metadata communities. The RDA-Lite should season the flexibility and streamlined nature of more recent metadata communities’ practices with the centuries of experience from the traditional cataloguing realm. From a publication standpoint, holding to the pricing practice of these communities, it should be inexpensive if not free-ware and possibly open source. Interested parties could derive other documents from the base document to provide detailed instructions for particular implementations. An institution preparing metadata encoded in some XML scheme could prepare an implementation document that identifies the data elements of interest and shows how each should be encoded and presented.

RDA-Lite would allow us to share with others what we claim to be our area of expertise, without involving in a detailed manner complexities related to transcription or any remaining remnants of issues related to presentation, such as the use of standard abbreviations and square brackets. RDA-Lite would also provide an opportunity for **other** communities to develop application profiles (rather than having the JSC do it), and the JSC could develop a mechanism for registering these RDA application profiles. Each application profile would deal with such aspects as mandatory-ness, repeatability, transcription, data normalization capitalization, abbreviation, etc.), sources of information, level of granularity of a resource, level of specificity of elements (*title* vs. *title proper* plus *parallel title* plus *variant title* plus ...), community-specific examples, etc. All RDA records would be explicitly identified as complying with one or more application profiles.

In addition to RDA-Lite, the full RDA standard would be an expansive “RDA-Complete” which will encompass the description of and access to traditional, tangible resources (or, alternatively, to both tangible and intangible resources but described for a library environment). The RDA-Complete would be a high-end purchased product in keeping with the standard pricing model of *AACR*. It should yield rules and records that simultaneously are tolerably backwards compatible with previous cataloguing practice and co-compatible with RDA-Lite records. In short, it would be very similar to what we are currently envisioning as RDA itself.

To achieve this end of developing a two-level standard, the comments on the draft of part 1 should be reasonably resolved as the potential foundation to part 1 of RDA-Complete. A Task Force/Working Group could then be instituted to fully compare non-*AACR* metadata practices and *AACR* traditions with an eye towards making recommendations for an RDA-Lite standard. Work on parts 2 and 3 could proceed with an awareness that

there may be guidelines geared for the Lite product and for the Complete product (although we expect that parts 2 and 3 will remain largely the concern of the traditional AACR community and much less so a concern of non-AACR metadata communities). After the Task Force/Working Group's work and the work on parts 2 and 3 are finished, part 1 should be revisited to create part I of RDA-Lite.

ALA urges the JSC to seriously consider this approach to moving forward with RDA. It would allow work to continue using approximately the same timeline and plan as currently in place, but would result in an end product that would be much more usable to both communities.

1b. Need for conceptual modeling

At the ALA Midwinter meeting, representatives from the IEEE LOM and Dublin Core communities strongly recommended that RDA needs to have a conceptual model of the resources it attempts to describe and give access to. These groups recommended that the JSC undertake a further modeling initiative to inform future work on RDA, and in particular to help the JSC to decide directions for RDA with regard to description and access to "dynamic", rather than "static", resources. ALA suggests that the JSC consider the comments on RDA from the IEEE LOM community, which are included in this response as Appendix A. We note that such a modeling effort could form a part of the development of an "RDA-Lite", as described above.

1c. Other metadata issues

ALA notes that the cataloguing community's use of the terms "*description*" and "*descriptive*" do not match the use of those terms by other library staff, nor by the larger metadata community. For example, the NISO document, *Understanding Metadata* defines "*descriptive metadata*" as "metadata that describes a work for purposes of discovery and identification, such as creator, title, and subject." Also, we currently use *description* in two different ways: a set of descriptive data for a resource, and the normal dictionary definition. Context does not always provide sufficient evidence to quickly and easily decide which meaning is intended within RDA. The seeming non-existence of substitute terminology is additional evidence that our distinction between subject and non-subject descriptive metadata is not useful (and supports our recommendation above that basic subject guidance be added to RDA to further do away with this distinction). We propose that we observe the following usage:

- *descriptive*: the sense described in the NISO definition above
- *description*: normal English usage
- *record*: the set of data that describes a resource

If the JSC agrees to observe the usage described here, we note the need to revisit the appropriateness of using the term "description" to refer only to the data elements that occur in part 1 of RDA, as we will describe below in our comments about the arrangement of RDA.

2. RDA Structural Issues

2a. Arrangement of chapters

ALA notes that the clear distinction between Description (Part 1) and Relationships/Access (Part 2) appears to be breaking down, given that some data elements in part 1 deal with relationships between resources, and some guidelines in part 1 now also include provisions for providing access points. However, it is difficult to assess what might be done to address this with only part 1 in hand. ALA recommends that, as the other parts of RDA are developed, additional consideration be given to rearranging data elements and/or chapters, or even perhaps eliminating the separation of RDA into parts.

The philosophy for the top-level structure of part 1 (other than chapter 1) is unclear to many ALA reviewers. 0.1.4. says that “Chapters 2-6 each cover a set of descriptive data elements that support a particular user task (e.g., identify or select)”. It appears that the relationship between user tasks and part 1 chapters is roughly as follows:

- Chapter 2: find and identify
- Chapter 3: select
- Chapter 4: select
- Chapter 5: obtain
- Chapter 6: all of the above, as they relate to items

The scope of Chapter 2 is especially confusing, as it does not include all of the data elements needed to identify a resource, and also includes some elements that are used to “find” a resource. Some reviewers wondered, given this overall schema, whether there is an advantage of having chapters 3 and 4 being separate, rather than being combined to form a single chapter for *select*. We suggest that a clearer rationale for the chapter organization needs to be given within 0.1.4 and in the statements of Purpose and Scope for each chapter. If the scope of the chapters relates both to the user tasks **and** to the Type I entities, as in the tables in Chapter 7 of FRBR, then this should be made clear. For example, the purpose of chapter 2 should be described as **to identify a manifestation** (not simply “identify a resource”) and the scope of chapter 4 should be described as **to identify and select a work or expression** (rather than simply “select a resource”).

2b. Separation of Content from Display

ALA notes that the process of separating guidelines for content vs. guidelines for display of data has only been accomplished at a superficial level with the relegation of instructions regarding punctuation to an appendix. Much work remains in part 1 to deal with issues that have resulted from this initial separation, especially in the areas of abbreviations, use of parentheses and square brackets, and ordering of data elements. ALA sees a need for an even more rigorous segregation of content from presentation.

ALA is also concerned about the usability of Appendix D. No doubt there will be a significant learning curve as cataloguers get used to consulting the appendix as well as the guidelines themselves.

2c. Designation of data elements

The text of RDA does not always make it clear what entities are to be considered data elements. Although many of the elements are easily identifiable (e.g., title proper, statement of responsibility, dimensions, intended audience), there are a number of entities that may or may not be considered as elements. The following are some of these:

- Title (2.3.0)
- Edition information (2.5.0)
- Numbering (2.6.0)
- Series [statement] (2.10.0)
- Subseries (2.10.7)
- Other technical details (3.6.0) – assuming that the individual entities (layout, production method, etc.) are elements

The status of an entity as an element within RDA has both theoretical and practical implications. If RDA is in any sense a data dictionary, there must be a clear list of elements. There must also be a clear designation of the relationships between those elements (see next comment). Practically, the text of RDA should be structured to provide some key information about each element. For example, definitions and guidelines on sources of information should be provided for entities that are to be considered as elements – and **only** for such entities.

2d. Relationships between elements

While ALA strongly approves the decision to document individual data elements rather than ISBD areas, we feel that some critical concepts have been lost in the process. Currently within RDA there does not seem to be a mechanism to show the relationship between associated data elements that must be considered together in order to be meaningful. These relationships were formerly conveyed through the structure of ISBD areas. The following are some examples of data elements that are not meaningful unless they are interpreted within the context of other associated data elements:

1. For a resource lacking a collective title, the titles of each part must be related to the appropriate statements of responsibility.
2. For multiple publishers, each must be related to the appropriate places of publication.
3. For numbering, the enumeration and the chronological designation must be linked appropriately.
4. Series numbering must be related to the appropriate series title.
5. A subseries must be related to the appropriate series.

It will be noted that many of these examples relate to repeated data elements. ALA will elsewhere recommend that the repeatability of each data element be explicitly stated. In that context, repeatability can only be defined within a meaningful structure. For example, the title proper of a series is repeatable within a description (a resource may be in more than one series), but not within a single series statement (any series can have only one title proper).

Further, the relationships raised in most of these examples are hierarchical. Title proper of series, subseries, and numbering within a series are all part of a higher-level element, the series statement. If the series statement is an element, as suggested in 2c above, then there is a hierarchical relationship between the series statement and the subelements. This is what the ISBD structure, not to mention the MARC content designation, provides. RDA needs to recognize these higher-level elements and to provide explicit definition of the hierarchical relationships. The definition of each element should specify when the element is subordinate to a higher element and/or when the element has subordinate elements. Most of this is already in the text of RDA as “node labels” for basic guidelines relating to multiple elements, although often without a clear sense of the status of the higher-level elements. Some remaining problems are:

1. The separation of title from statement of responsibility leaves no candidate for a higher-level element that would allow the titles and statement of responsibilities of resources without a collective title to be related (example #1 above)
2. The separation of the three elements relating to publication leaves no candidate for a higher-level element that would allow place and name of publisher to be related (example #2 above).
3. If the elements relating to technical description are repeatable, then there is no higher-level element that would allow particular instances of extent and dimensions to be related.

There are other relationships that are not purely hierarchical. Example #2 above addressed the relationship between name of publisher and place of publication. The basic instruction (which is in fact in the text of 2.8.0.4) is to record the different elements “in the order indicated by the sequence ... on the source of information” – in other words, record the place preceding the name to which it applies. In order for this guideline to be meaningful, (a) place and publisher must both be a part of a higher-level element, and (b) the **order of the information** within that higher-level element must be significant. The basic concepts that support these two points are not yet provided in RDA.

As a content standard, RDA needs to include explicit guidelines about the articulation of these relationships (although there also needs to be recognition that not all applications of RDA are able to support relationships). This is emphatically **not** simply a matter of presentation or mark-up; these are relationships that are an integral part of the nature of bibliographic information and need to be recorded along with the data. In Appendix B of this document, ALA offers an analysis of what might be considered high-level RDA

elements (based on the present draft), and some suggestions for how the relationships between these and their subelements might be articulated within RDA.

2e. Notes vs. other data elements

ALA recommends that the distinction between notes and other data elements be reexamined as a part of the continuing process of reworking the elements from the former ISBD areas into distinct data elements. The purpose of elements designated as “Notes” now needs a clear definition that is **not** simply a matter of display (ISBD) or content designation (MARC). While it may be desirable to retain the concept of “Notes” for free-text descriptive data that relates to other data elements (particularly to **transcribed** elements), the practice of relegating to notes information that may be useful for identification of a resource, or for access, is not helpful and needs to be reassessed. We need to get away from the idea that a catalogue record is read in its entirety from top to bottom, as if it were a static, printed card, and start thinking about the elements of description as separate units that can be reorganized for display to suit the needs of the catalogue user.

Without seeing part 2 of RDA, we cannot assess whether the issue of providing access to these other elements will be addressed there. Some specific examples where information is now being relegated (perhaps unnecessarily?) to notes include:

- Some statements of responsibility: what is the continued rationale for recording some as statements, but relegating others to notes?
- Country of original production for moving image resources
- Date of original broadcast for sound and moving image resources
- Other details related to the publication of an original resource, within the description of a reproduction (original publisher, place of publication, date, series, etc.): we would like to see each of these as a separate data element.
- For a reproduction, identifiers for the original resource that appear on the reproduction (e.g. music plate numbers: see our comments under 2.12.2.3)

Regarding the last two bullets above, defining new data elements for information related to original resources and their reproductions that is now grouped within a single note could potentially move us closer to a resolution of the issue documented in the LCRI regarding reproductions that is followed in the U.S. If information related to both the original and to a reproduction is recorded as separate, accessible data elements, an agency will have much more flexibility to design record displays using whichever data elements it chooses to emphasize for its users.

2f. “Statements”

ALA would like to see data elements that are labeled as “statements” (of responsibility, edition statements, etc.) be distinguished somewhere in Chapter 0 or 1 from other data elements. What makes a “statement” a “statement”: is it information that is formally presented? And how does one define “formally presented” (as used in Chapter 3)?

2g. Need for additional data elements

Now that RDA is no longer constrained by the content of the ISBD areas, ALA recommends that the JSC explore adding additional data elements to RDA that are either already an important part of cataloguing practice (e.g. already have MARC coding), or which could potentially improve access to resources in a digital environment. In particular, we note the following:

- ALA strongly urges the JSC to add elements that provide both subject access and the organization of works by classification to RDA. The guidelines for providing these elements need not be more than references to external guidelines, but we believe that users outside the library community would both expect guidance in these areas and benefit greatly from its inclusion within RDA.
- ALA recommends that RDA be more inclusive of other identifier standards, such as the ISAN (International Standard Audiovisual Number), as these are developed in the future. The “data dictionary” approach used within RDA makes it extensible enough that additional elements for identifiers should be routinely considered for inclusion in RDA as the standard is revised in the future.
- Other data elements that are useful to staff rather than to users (such as an “action” field, or preservation information) should be considered. Defining these as distinct entities should make it easier to control whether or not these elements display to users.

3. RDA Formatting

3a. Format of text

Lack of numbering of bullets: ALA found the review process was made more difficult by the lack of numbering for the bullets in many RDA guidelines. It became very tedious to refer to “the second sub-bullet under the first bullet under number such-and-such”. While we understand the desire to avoid long, complex numbering, we urge the JSC to keep this issue in mind.

Repetition of text: While we were asked to accept the presence of redundant text that may be necessary to facilitate the reference structure of the online version of RDA, ALA is concerned that the usefulness of the printed version will suffer because of this repetition, unless some of it can be removed before the printed version is published. Smaller libraries and public libraries in the U.S. have expressed continued concern that that they will not be able to afford to purchase the online version.

Designation of mandatory elements: As we will discuss more fully below under 1.4, ALA recommends that RDA indicate clearly which elements are mandatory within the guidelines for each element, in addition to the list at 1.4. Reviewers found the guidelines

in the draft very confusing in this regard; the instructions to record an element make it appear as though all elements are required.

Wording of options: what is the difference between “if desired”, used in five places (3.4.3.2., 3.4.3.3., 3.6.0.4., 5.3.0.4. and 6.2.2.), “if considered important”, and “if considered to be important”, used much more often throughout the code? Should the former be altered to one of the latter? It is also sometimes not clear at various options whether they instruct the cataloguer to do something in addition to what the main guideline instructs (such as at 2.3.0.5) or in place of it (such as at 2.3.7.3). The option at 3.4.4.1 is an example of this ambiguity. ALA would like to see these two types of options (which are described at 0.1.7) clearly differentiated within RDA so that all options of one type or another can be clearly located. From a cooperative cataloguing perspective, recording *different* data is a much bigger concern than adding *additional* data.

Inconsistency of headings: we note considerable inconsistency in the use of headings applied to various sections of the code addressing change. Sometimes (as in Section 2.3 addressing titles), it is the clearer:

- Multipart monographs
- Serials
- Integrating resources.

Other areas of the draft include the more ambiguous:

- Resources issued in two or more parts simultaneously
- Resources issued in successive parts
- Integrating resources.

Still other areas of the draft contain a combination of the two lists or categories. ALA understands that such headings are an attempt to reflect the actual scope of each guideline, but we are concerned that such inconsistency will cause confusion among cataloguers.

While the structure of the online version of RDA may alleviate this concern somewhat by drawing together all instructions that relate to serials, for example, whether the actual heading is “serials” or the broader “resources issued in successive parts”, we are concerned that the printed version of RDA will be quite difficult to use in this regard. Even if a single guideline or a single bullet within a guideline applies to more than one type of resource, it would be more helpful to have all types of resources specified in the heading; the needed instructions would be easier to find, and it would be easier to train new cataloguers.

ALA would also like to see more clarity in headings when a guideline clearly applies to only limited categories of resources, so that users do not have to read the text of the guideline to discover whether or not it is applicable to what they are describing. Section 2.6 on Numbering is a good example of this. Again, this is a significant usability concern for the printed version of RDA.

3b. Format of guidelines

While we agree that a section called “purpose and scope” at the beginning of each chapter that explains why the chapter exists (purpose) and why some things are in it and other are not (scope) is important, care should be taken so that this section does not just repeat the table of contents, as is the case for Section 1.0. We also suggest using the term ‘attributes’ in place of ‘characteristics’ in these sections in order to be consistent with the goal to align RDA with FRBR terminology.

ALA has an overall concern that the definitions in Part 1 often include the word being defined as part of the definition; this type of circular definition is not particularly useful.

Missing from the guidelines is a section covering what kind of information to expect at each data element. This is an important part of any well-conceived standard containing elements. The following standards provide examples of this that may be worth emulating within RDA:

- *CONSER Cataloging Manual*, Introduction to Part 1, paragraph 5
- *CONSER Editing Guide*, D1. Content, Organization, and Layout
- Content Standard for Digital Geospatial Metadata, Organization of the Standard
- DCMI Metadata Terms, Section 1. Introduction and Definitions
- Encoded Archival Description Tag Library, Tag Library Conventions
- Getty vocabularies (Getty Thesaurus of Geographic Names, Art & Architecture Thesaurus, or the Union List of Artist Names), About the vocabulary, Information in the Record (Fields)
- *Library of Congress Subject Headings*, Components of Entries
- MARC 21 format (any), Introduction, Organization of This Document, Components of the Detailed Descriptions
- Medical Subject Headings, XML MeSH Data Elements, Key to element information
- *Thesaurus of Graphic Materials*, Introduction, I.C. Structure and Syntax
- UDC MRF Database Development and Design, Database structure
- *UNIMARC Manual : Bibliographic Format*, 2. Organization of the Manual
- VRA Core Categories, Category attributes
- many XML DTDs and schemas

3c. Use of parentheticals and “etc.”

Within the text of many instructions, the appearance of ‘etc.’ is problematic. While instructions within a cataloguing code ideally need to be clear and precise, the use of etc. within a list represents a universe of possibilities that are not specified – and is therefore the very opposite of precise and specific. In general, it makes these instructions difficult to read and follow.

The same can be said for the heavy use of parentheticals, which should be moved to the end of each instruction whenever possible. While it is difficult to limit the use of parentheticals in a code as complex as RDA and in instructions that sometimes reference more than one additional instruction, their use makes it more difficult to read and understand the text quickly and clearly.

3d. What to do if you can't follow an instruction

ALA reviewers mentioned various instances within RDA where it is not clear what the cataloguer should do if he/she is unable to follow an instruction within RDA because the information to be recorded is unknown. In particular, this seems to be an issue in Chapter 3: for example, the cataloguer may not know the production method (3.6.3.5) or the reduction ratio (3.6.13.5) of a resource. In these situations, it is not enough to simply instruct the cataloguer that a particular data element is not mandatory and so may be omitted: in some cases a cataloguing agency may wish to do more than simply omit the information, such as specifically recording that the data is unknown (e.g. "Reduction ratio unknown"). Are there certain cases where this is allowed, and others where it is not? We realize that this is additional guidance beyond what appears in AACR2, but it would serve to make RDA easier to use. If the JSC is interested in pursuing this, ALA would be willing to compile a list of guidelines where such text might be useful.

Specific Comments

Introduction to Part 1

Comments on Specific Guidelines in the Introduction to Part 1

0.1.0. Purpose and scope

ALA notes that the word "comprehensive" in the first sentence is an overstatement, since part 1 does not currently contain any guidance on many areas of bibliographic descriptive metadata: not subjects, classification, or shelving, and not all the specialized metadata for particular media or types of content. We recommend removing this word.

The 1st paragraph divides the bibliographic world into analog and digital formats; we do not believe these are mutually exclusive. Later, in 1.1.1 (2nd bullet) resources are described as tangible or intangible. We prefer the latter terminology for use in both guidelines, and suggest that the concepts "analog" and "digital" be incorporated as examples in the second paragraph.

ALA also notes that the list of types of content and types of media in the second paragraph may require adjusting once these terms are decided upon for inclusion in Chapter 3.

0.1.1, 3rd paragraph

At some point, either here or in the General Introduction, RDA should include a complete list of all relevant specialist cataloguing manuals. The mention here of only the archival manuals is puzzling. ALA would be happy to provide a list of other manuals suggested for inclusion if the JSC would find this helpful.

ALA notes that FRBR, FRAR and ISSN cataloguing practices should also be mentioned somewhere in RDA, although perhaps more appropriately in the General Introduction.

0.1.2 a)

ALA notes possible confusion here regarding the term “user”: user of RDA? vs. user or records created using RDA (user of the catalogue). We recommend specifying in the first sentence here that it refers to a “catalogue user”, or another appropriate term.

In at least three instructions of this chapter (01.2 a), 0.1.4 (4th paragraph, 2nd sentence), 0.1.6 (1st paragraph, final sentence), a similar phrase is used with slightly different wording:

- to distinguish between two or more resources with similar characteristics
- to distinguish between two or more resources bearing similar identifying information
- to differentiate the resource from one or more other resources bearing similar identifying information).

Unless there is a deliberate attempt here to convey different concepts, we suggest selecting an optimal phrase and using it consistently here and anywhere else this phraseology may be used in the code.

0.1.4, 2nd paragraph. See above comment about wording under 01.2 a).

0.1.5. Presentation. The caption for this section is not particularly informative – and could be confusing as we are trying to separate **content** of data from **presentation** of data. Consider changing the caption to “Intended Use”, or perhaps merging it into 0.1.4.

0.1.5, 2nd paragraph. See comments above under 0.1.2A. In this case the word “user” refers to a user of RDA, rather than a user of the catalogue. Suggest clarifying this to “decisions the user of RDA (or “cataloguer”) need to make”

0.1.6. Mandatory elements. As we recommended above in our General Comments associated with the format of the text, ALA would like to see each data element clearly labeled within the text to indicate whether or not it is a mandatory element, and also whether or not it is repeatable. If this recommendation is adopted, we would like to see 0.1.6 explain this formatting convention, and also explain clearly that all other elements are optional. (See our additional comments on this issue at 1.4 below)

0.1.6, 1st paragraph, final sentence. See above comment about wording under 01.2 a).

0.1.6, 3rd paragraph. Several reviewers found the wording of this paragraph difficult to understand. One suggestion was to break up this long sentence with the use of parentheses: “Mandatory requirements for access points (see 7.4) and policies and guidelines on levels of access (established by the agency responsible for the provision of access points) should also be taken into account when applying the specifications for mandatory elements of description.”

0.1.7. Options. If our recommendation (under General Comments) to clearly differentiate between the two types of options described here is accepted, we recommend explaining the wording conventions used for this throughout RDA under 0.1.7.

0.1.8. Language preferences

ALA reviewers expressed some confusion over whether “different language context” (in the 3rd paragraph) includes script preferences. We would like to see script preferences covered here as well, and explicitly mentioned.

ALA notes that it would be worth discussing the definition of a new data element: “Language of the description”.

Chapter 1. General Guidelines on Resource Description

Comments on Specific Guidelines in Chapter 1

1.1.1. Resource, 1st bullet

We do not find the new terminology “center of focus” to be an improvement over the previous “basis for a resource definition”. ALA suggests the following wording instead:

- The term **resource** is used in part I (and throughout RDA) to refer to the object or entity that forms the center of focus for a resource description being described.

If this is not acceptable, we’d prefer to use “basis for a resource description” instead of “center of focus.”

The first bullet also implies that some terms might be used differently in different parts of RDA. Terms should be used consistently throughout the whole document, and this guideline should not imply otherwise.

The definition of “resource” here brings up the broader issue (also discussed in our General Comments) about the need for a conceptual model of the resources that RDA attempts to describe and give access to. Is the term **resource** confined to the FRBR group 1 entities, and how specifically does it relate to them? Can a person be described as a resource? What about other types of entities that are currently described using the MARC21 Community Information Format?

ALA understands that a decision has been made that descriptions created according to RDA part 1 will be created at the manifestation level. It seems, then, that the term **resource** is being used in part 1 instead of **manifestation** as a type of “shorthand”, instead of explaining that the resource itself may be a manifestation, a part of a larger manifestation, or a collection of manifestations. If this is the case, this usage should be explained in this guideline. If there is a different rationale for using **resource** instead of **manifestation** throughout part 1, that rationale should be explained more clearly.

1.1.1, 3rd bullet. To better illustrate how archival resources may fit into these definitions, consider revising the third bullet:

- The resource described may consist of a single unit (e.g., a single photograph) or it may comprise two or more discrete units (e.g., three sheet maps, 10,000 items, etc.).

1.1.1, 4th bullet. The definition seems to apply perfectly well to a group of individual digital items that have been “collected” into a group by a selector and presented digitally as a “collection” even though the original analog items were not bibliographically related. However, the words “a collector” seem to provide a textual or archival bias to this guideline. Just dropping the phrase “by a collector” would open up the potential applicability of the sentence. Suggested change:

The resource described may represent two or more units produced and/or issued as a set, or it may represent two or more units assembled after the fact ~~by a collector, etc.~~

1.1.1, 5th bullet. The fifth bullet phrase “after the fact” begs the question of after what? The sentence is fine without that phrase. And technically someone could assemble a collection before its components are published.

1.1.2. Mode of Issuance. The first and third bullets include the word “issued” in their definitions, which seems to leave out assembled collections. We suggest changing the wording to something like “issued or assembled”.

1.1.2, 1st bullet. The definition given in the first bullet would include a single-issue serial. Is this intended?

“Logical unit”: In terms of online resources, we find the concept of “logical unit” in this section problematic, and don’t think that it will be understandable to the average RDA user without a definition. What constitutes a logical unit to one person will not appear the logical unit to another. For example, it is possible to catalogue an entire website on one record OR all the publications listed on that website, each with its own record, OR a single chapter of a single publication found on that website, OR a single image found in a single chapter of a single publication found on that single website (see also comments below on Multilevel Description). Mode of issuance needs to be more sufficiently defined to clarify some of the following situations:

- Is a PDF file the only intangible resource that can be included under the first bullet?

- Can an HTML file also be a single logical unit?
- Can a website be a single logical unit?
- If a web resource has subfiles, does it automatically fall into the category “issued in two or more parts simultaneously”?

1.1.2, 1st and 2nd bullets. The first two bullets make a distinction that does not come naturally for some music materials, especially materials issued as a set (such as 4 parts, or 2 CDs in a single container). Initially we believed that this was simply a semantic distinction that would make little difference in applying the RDA guidelines. However, after seeing the RDA prototype that utilized “mode of issuance” to retrieve a specific set of guidelines, this distinction could carry more importance. Thus, we recommend expanding the definition of the first bullet in this instruction to include sets of material issued in a single discrete container, following the example of a “single logical unit” for intangible resources in the 1st bullet.

1.1.2, 2nd bullet

Excluding the exemplary parenthetical, the definition reads “a resource comprising two or more physical units or, in the case of an intangible resource, two or more logical units.” That would include resources issued in successive parts, which does not seem the intent, given the phrase “issued as a set” in one of the parenthetical examples, and the third bullet. The definition needs to include wording such as “issues as a set” or “together”.

We assume that “resource issued in two or more parts simultaneously” does not mean single texts issues simultaneously in print and in PDF. For seasoned cataloguers, this might be clear (and helped by the examples), but we wonder if there needs to be a note of exception to guide newer users of the code. We suggest adding a monographic series as an example here in the parenthetical.

1.1.2, 2nd and 3rd bullets

ALA is concerned about the categories outlined under Mode of Issuance, as we mentioned above in our general comments regarding the inconsistency of headings. While the categories are theoretically logical, they may present difficulties for the practical application of the RDA guidelines. One source of confusion is that multipart monographs quite easily fall within two of the categories because of their varying modes of issuance. Multipart monographs are sometimes issued ‘in two or more parts simultaneously’, and sometimes ‘issued in successive parts’, and a cataloguer may not know for sure how a particular multipart monograph is issued. There are also those multipart monograph titles that initially issue two, three or more volumes, and then settle into a pattern of issuing additional successive parts as well. Because the instructions for handling resources within those two RDA categories sometimes differ, it needs to be clear exactly what resources RDA intends to address within each section of the code and within each subsection of those instructions.

The CC:DA Task Force charged with writing and maintaining the document *Differences between, Changes within: Guidelines on when to create a new record* struggled with the same problems. This group's eventual resolution was to categorize four resource types based not only on their mode of issuance, but also on how they behaved bibliographically: single part monographs, multipart monographs, serials and integrating resources. Continuing Resource cataloguers within ALA would prefer to see 1.1.2 Mode of Issuance and 1.1.3 Intended Termination merged into one section that could then refer to the more traditional terms "multipart monograph" and "serial" for added clarity.

ALA also recommends that the terms 'parts', 'issues', and 'iterations' be used rigorously to further clarify the wording of the guidelines, so that 'parts' is always used to refer to multipart monographs; 'issues' to designate instructions for serials, and 'iterations' was used for instructions about integrating resources. Such a distinction does not appear to be used consistently within the draft.

1.1.2, 3rd bullet. It would be helpful to specify that a "resource issued in successive parts" could include separately numbered articles of an electronic journal even if they are not gathered together into issues. We recommend changing the final "e.g." statement in the 3rd bullet to read:

(e.g., the monthly issues of an electronic journal; the separately issued articles that constitute some electronic journals).

1.1.2, Other resources. The guidelines under 1.1.2 do not currently deal clearly with multipart integrating resources and serials whose issues are themselves multipart (e.g., an annual 3-volume directory). ALA recommends that additional wording be added to clarify how these resources are covered.

ALA continues to see a need to have specific guidelines for handling "replacement volume sets" covered in some way within RDA. The law library community in the U.S. suggests that this type of resource be added to 1.1.2 and recommends possible wording below. (We will also suggest that a glossary definition be added to RDA.)

Following the third bullet, add:

Replacement volume set is a type of resource issued in successive parts. New parts are issued over time which replace discrete parts and are integrated into the set. As an exception, these are treated as integrating resources.

1.1.3. Intended termination

We question why integrating resources are not covered here. While most integrating resources do not have a pre-determined conclusion, it is not too much of a stretch to think of occasions where there WOULD be a pre-determined conclusion.

ALA suggests that this section might be usefully reconceptualized under the heading "Intent to Continue". Such a re-wording would phrase the statement in a positive way and use a word that is more commonly used to express the concept of having no

predetermined conclusion. The words “continuing” and “continuations” are familiar both within and outside the library community and also relate to the term “continuing resource.” We suggest re-wording the instruction as follows:

Resources may also be referred to using terms that reflect a distinction between those that are complete or to be completed within a finite number of parts and those that are to be issued over time with no predetermined conclusion.

The term **multipart monograph** refers to a resource ...

Add:

The term **continuing resource** refers to a resource that is issued over time with no predetermined conclusion. Continuing resources include serials and those integrating resources with no predetermined conclusion.

The term **serial** refers to a resource ...

We also recommend adding the following, based on the text of AACR2 12.0A1 which appears to not have been carried forward within RDA:

Apply guidelines for serials also to resources resulting from limited-duration activities if the resources have characteristics of serials, such as successive issues, numbering, and frequency, e.g., a daily bulletin issued during a non-recurring meeting; the quarterly activities report of a project; the annual report of an expedition; a magazine with a predetermined number of issues.

1.1.3, 2nd bullet. The use of the term “series” in “series of annual reports” is potentially confusing, because we often use the term “series” to mean “monographic series.” One alternative would be to make all of the terms in the “e.g.” statement plural (e.g., periodicals, annual reports, or newspapers) so that the word “series” could be deleted.

1.1.4. Comprehensive, analytical, and multilevel description, 1st bullet. It needs to be more obvious that the section on comprehensive description includes the concept of a printed monograph or single part work. We suggest changing the “e.g.” statement to replace “teacher’s manual” with “single textbook”, or “single monograph.”

1.1.4, 2nd bullet. The term “analytical description” is unnecessary cataloguing jargon. We suggest renaming the concept “component description”.

1.1.4, 3rd bullet. This definition could be seen to include a contents note on the record for the larger resource. We need to make clear whether a multilevel description can include an analytical description of only one or some of its parts, or whether it must include analytical descriptions of all its parts.

1.2.1, 1st bullet. Should there also be something here to cover “a resource with accompanying material”? The “resource issued in two or more parts” seems to reference only multivolume works and kits, rather than accompanying material.

This guideline also seems to be lacking: “a resource updated by parts that remain discrete (e.g., a book with a free standing supplement)”.

1.2.1, 2nd bullet. It is too prescriptive to use the “or” in these alternatives for recording the details relating to the parts of a resource. We recommend that this be reworded to allow alternative a) and/or alternative b), since some libraries may prefer to do both. We also suggest the addition to the list at the end of 1.2.1: c) in a note.

1.2.2. Analytical description. As mentioned above, the term “analytical description” is unnecessary cataloguing jargon. We suggest renaming the concept “component description”.

1.2.2, 1st bullet. In item iv): It would be helpful to include an example for a web page:

- iv) a part of an integrating resource (e.g., one chapter in an administrative manual issued as an updating loose-leaf volume, or a Web page that is part of a larger Web site)

1.2.3. Multilevel description

Regarding our comments above under 1.1.2 concerning the ambiguity of using the term “logical unit” for online resources, one ultimate solution may be to provide description at many different levels of granularity at the same time, as a way to express the hierarchical nature of some electronic resources. ALA suggests that future discussion take place regarding taking the concept of multilevel description beyond the realm of record display and more fully use it to express the hierarchical (or whole-part) relationships among resources.

ALA notes that this instruction uses the phrase “single hierarchical display” followed by a reference to D.1.4, but that phrase does not appear in D.1.4 itself. We will suggest adding a mention of hierarchical display to D.1.4 below, for consistency.

1.2.3, 2nd bullet. We wonder whether it is still appropriate to include this bullet that provides specific guidance on displays. In the two accompanying instructions (1.2.1 and 1.2.2), the parallel 2nd bullet addresses how to **record** data within part/whole relationship(s). This bullet, however, advises libraries and ILMS system designers on how to **display** them.

1.3. Changes requiring a new description

This section of RDA is incomplete without some guidance on when a new description is required for resources other than serials. We ask the JSC to reconsider whether broader, high-level instructions would also be appropriate for inclusion in this section. ALA would be willing to bring forward a specific proposal related to this if the JSC is interested in pursuing it.

The most pressing need here is for guidance for integrating resources, and for resources that change mode of issuance over time. However, even single volume

monographs can be issued in successive editions/printings and cataloguers need guidance about when to create a new record and when to use the existing record.

Such high-level guidance could be based on the ALCTS publication *Differences Between, Changes Within* or on text from the Program for Cooperative Cataloging manual. A summary of the PCC guidance on when to create a new description for integrating resource appears below, as an example of the level of text that ALA believes might be appropriate for inclusion in RDA (the actual wording to be proposed would require additional discussion):

When describing an integrating resource that is an updating loose-leaf, create a new description when:

- a. the edition statement changes and/or the publisher issues a new base volume or volumes with an *in toto* replacement of the contents
- b. mode of issuance changes e.g. monograph or serial to integrating and vice versa
- c. physical format changes; e.g. updating loose-leaf to updating database or serial

When describing an online integrating resource, create a new description when

- a. an edition statement on a resource changes and the resource described on the original bibliographic record continues to exist as a separate resource
- b. when the original URI remains active but now links to a completely different resource than that described in the bibliographic record.

Additional text covering monographs could be derived from the ALCTS publication mentioned above.

1.4. Mandatory elements of description

ALA would like to see the concept “mandatory if applicable to the resource being catalogued” clearly added to these guidelines, as some elements in the list of mandatory elements are not appropriate for all materials. Within the text of the guidelines for each data element, ALA would also like to see each element listed with an indication of whether or not the element is considered mandatory (see our comments about this mentioned above under General Comments). Such an approach would have alleviated much of the confusion that ALA reviewers had as they encountered elements that appeared, from the wording of the guidelines, to be mandatory because the wording of the text instructed that the data element be recorded. This confusion is exacerbated by the use of the terms and phrases “optionally” and “if considered to be important” when they refer to whether or not to record a data element, rather than HOW to record the data element. ALA is concerned that this will be a significant training issue with RDA.

ALA also recommends that the concept of “repeatability” of elements be added to this guideline, so that the list of elements under 1.4 indicates which elements are repeatable. Clarification of this concept here will result in additional clarity under the guidelines that follow (e.g. under 2.5, for recording multiple edition statements).

We note a discrepancy between the list of mandatory elements and the inclusion of elements within Chapter 2: Identification: not all of the elements specified under 1.4 as being “basic requirements for the purposes of identifying those entities” are included within Chapter 2, on Identification. Is there a rationale behind this?

The first paragraph of 1.4 notes that the basic requirements are taken from FRBR but never explicitly states that are considered mandatory for RDA as well. If they are considered mandatory within RDA, we suggest that the guideline explicitly say so.

ALA finds the organization of this instruction confusing, and would prefer to see the 2nd bullet that gives direct guidance to the cataloguer appear before the list of elements, rather than after.

1.4. Comments on the List of Mandatory Elements

The element labeled “Date of publication, distribution, etc.” is unclear. Does this include “date of production” for archival description? We feel that a list of mandatory elements should be worded explicitly, and not use the ambiguous term “etc.”

The element labeled “numbering within series” should be footnoted to say that it is not mandatory for serials within series unless all issues or parts of the serial carry the same series number.

Our comments on Sources of Information under 2.2 advocate making the Source of Title note mandatory in an expanded number of situations. If this suggestion is followed, we suggest that the Source of Title be added to this list of mandatory elements, with a reference to 2.2 for additional guidance on when Source of Title should be recorded.

1.4, 2nd bullet, Option

Without seeing the guidelines included in parts 2 and 3, it is impossible for us to fully evaluate the impact of the option to include an access point in lieu of the statement of responsibility. Will RDA continue to require that added entries be justified somewhere within the description? ALA believes that this practice should continue. If it does, and an institution applies the option in this guideline, would they then be required to make a note about statement of responsibility? How is this an improvement?

ALA is very uncomfortable with the possible impact of applying this option upon determining usage for authority work. Cataloguers know from experience the difficulty that not having a transcribed statement of responsibility may cause. We also note the value of such phrases as “written by”, “edited by”, “directed by”, etc. which explain the relation of the name to the resource and would be lost by omitting the statement of responsibility. Will the guidelines in parts 2 or 3 allow more flexibility for recording relator information to make up for the loss of the statement of responsibility? Will part 3 instruct in the documentation of usage as a part of authority work? It is difficult to interpret the possible effect of this option without seeing parts 2 and 3.

1.5. Language and scope of the description. Please see the ALA response to *5JSC/LC/5* for our comments on this section of RDA.

1.6. Transcription

In general, ALA agrees with the principle of transcribing what is found on the resource being described. This principle will provide for the least differences between captured and manually-created data, and will facilitate record matching algorithms. However, we have some specific concerns as described below.

We suggest that the JSC consider adding a general option to this guideline for early printed resources to allow full transcription. Placing the option here would relieve the necessity of giving repeated “Optional” instructions for early printed resources throughout the text, since a statement such as “following the general guidelines on transcription given under 1.6” would suffice.

1.6, 1st bullet, Option. The use of “etc.” after the word “symbols” makes it very unclear whether or not the option applies to everything under 1.6 or not. Specifically, does it apply to abbreviations? We are assuming that it does (and we think that it should), but this was not clear to ALA reviewers, and we recommend that the option explicitly spell out ALL of the topics included under 1.6 to make this absolutely clear that the option applies to everything covered under 1.6.

1.6.1.1. Capitalization of titles

In a), change “do not capitalize the article” to “capitalize the next word rather than the article”.

Both sections b) and c) in 1.6.1.1 (“Capitalization of titles”) are applicable to other transcribed elements besides titles, including name of publisher. For instance, names of publishers of web sites may take the form of a URL. An example is “iknowledgenow.com” (which according to the Web site, has its own president). Similarly, the name of an organization can begin with a compound term starting with a lower case letter followed by letters in the uppercase (e.g., the eLearning Guild). Thus, the instructions in these sections should apply to capitalization of transcribed elements in general (particularly publishers/distributors), and not just to transcription of the title.

1.6.2. Numerals and numbers expressed as words

Please also see ALA’s response to *5JSC/LC/5* for additional comments on this guideline.

We like LC’s proposed rewording of the first bullet of 1.6.2, which simplifies the text. We suggest further that the guideline be reformatted so that data elements covered under this bullet can either be set off in a list to draw emphasis to them (as in the second bullet), or perhaps bold them in the text so that they are easier to see.

1.6.2.2. “Substitute Arabic numerals for numbers expressed as words” (& all of 1.6.2.1-1.6.2.5) ALA reviewers are concerned about the formatting of this section, where this very unequivocal statement is separated somewhat from the instructions above it that tell you to transcribe titles & statements of responsibility as presented on the preferred choice. If you read the text linearly, you’ll see the first instruction first. But if you are

doing a “find” in the online version of RDA, you might get to this instruction without having read the preamble above. We suggest referring back to the data elements listed in the 2nd bullet in 1.6.2 in each of these subsections for extra clarity.

1.6.2.3. Please see ALA’s response to *5JSC/LC/5* for comments on this section.

1.6.2.5. Ordinal numerals, 2nd bullet, footnote. The footnote should refer to the later edition: Allen, C.G. (Charles Geoffry). *A manual of European languages for librarians.* – 2nd ed. – London: New Providence, NJ : Bowker-Saur, c1999.

1.6.2.5, 3rd bullet. Does this mean “in all cases” or only when the character is present? It’s not clear. We suggest adding “if it is present” at the end of sentence.

1.6.3 and 1.6.4. We question the consistency and applicability of both of these guidelines as applied to data that is automatically captured.

1.6.3. Accents and other diacritical marks

We find the rewording of this instruction confusing. It now only addresses the situation in which the title in the source of information appears in upper-case letters; it does not address the situation in which the title appears in lower-case letters, but the diacritics whose presence would be expected according to standard usage of the language in question have been omitted. If diacritics are to be supplied when converting from upper-case to lower-case, should they not also be supplied when the source of information presents lower-case letters, or a mixture of upper and lower case?

If this instruction is kept (and we suggested that it be deleted in our response to the draft of part 1 of AACR3; see response table #145), we suggest at least adding the words “when possible” or “if known” to the end so that a cataloguer who is not familiar with the language would not be required to do this.

1.6.5. The caption includes “acronyms”, but the text of the guideline does not apply to acronyms.

1.6.6. ALA disagrees with the new provisions of this new guideline and requests that the provisions of the comparable AACR2 rule be reinstated. It is a disservice to users of the catalogue to not provide them with the form of the title that they would likely search. We also note that publisher’s metadata will likely provide the title as it is intended to be read, not the creative graphical layout.

1.6.7. Abbreviations

ALA reviewers expressed significant concern about the provision to substitute one set of abbreviations for another, and were unclear that the option provision under 1.6 would allow institutions to set internal policies about the use of abbreviations (see our earlier comments recommending that this be stated more clearly under 1.6). We would also prefer to have the appendix use standard U.S. postal abbreviations instead of the abbreviations that appeared in the appendix of AACR2. (While we may end up with

some confusion between “CA” for California and “CA” for Canada, that is not RDA’s problem to solve!)

ALA would like to see “Publisher, distributor, etc.” removed from the list of elements for which abbreviations are used, and added to the list in the 2nd bullet instead, to further move us toward “take what you see”. We also note the anomaly (which carries over from AACR2) that it is permissible to abbreviate in an edition statement but not in a statement of responsibility associated with an edition statement. We would like to see a more consistent approach.

1.6.8. Inaccuracies

ALA is concerned that the new guidelines here for transcribing inaccuracies represent one area in RDA where we have gone too far toward “take what you see”. While the simplification would be useful in a metadata environment, it may have a serious negative effect upon the efficiency of cataloguing in share databases. Cataloguers working in a shared environment (where they are comparing an item in hand against existing record(s) to determine if the record matches what they have) have come to depend on the use of “[sic]” and “i.e.” as a method of separating typos, etc., introduced in the publication process from what we might politely call ‘anomalies’ introduced in the cataloguing process. Staff who maintain those shared databases (at OCLC, for example) also depend on the ‘[sic]’ and ‘i.e.’ techniques. It’s not clear that moving this information to a note will be as efficient as these techniques.

We did not come up with an alternative solution that received universal support within ALA, but request that JSC discuss an alternative approach where a cataloguer would do the following:

1. Correct the error in the field, without marking the correction (e.g. through the use of square brackets) in any way
2. Indicate the correction in a note
3. Provide an alternative access point under the incorrect form of the element, if necessary.

Whether or not the practice in 1.6.8 is changed regarding the recording of the inaccuracy itself, we strongly recommend that the guideline provide a reference forward to the appropriate part 2 instruction that an access point be provided under the other (corrected or uncorrected, depending on the wording of 1.6.8) form if considered to be important. We would also like to see an explicit reference here to 2.3.1.7a; the general “except where instructed otherwise” is too general to be useful.

1.7.1. Capitalization. While there was not clear agreement within ALA, there was strong sentiment expressed in favor of deleting this entire guideline. If it is retained, we recommend that the instructions here take into account the cases given in 1.6.1.1, especially regarding sentences that begin with a compound term that begins with a lower case letter or letters followed by one or more letters in upper case (see 1.6.1.1. b) or with an Internet address (1.6.1.1. c).

1.7.2. We would hope that there could be an option here that would not require cataloguers to insert quotation marks in captured metadata.

1.7.3. This could be greatly simplified by changing the caption to “Further information” and changing the text simply to:

When known and considered to be important, refer to sources of further information about the resource.

1.8. Descriptive elements used as access points

This brief instruction seems out of place here because it deals with access points and system requirements. If it is retained (and some ALA reviewers would prefer that it be deleted), it should be expanded to be more informative.

The concept covered here brings up a whole host of issues that need further discussion. The very traditional division, carried over from AACR2 into RDA, of description vs. access means that the data elements are presented in more than one place, or some are presented in one part, but not in another. Some elements need to serve both functions of description and access, other elements are in effect doubled to serve the functions separately. Or some elements are treated in both those ways. As we mentioned in our General Comments, ALA thinks that it would be worth discussing abandoning the overall division in the textual presentation between description and access. All data elements used by RDA could then be listed together, in a more coherent way.

Chapter 2. Identification of the Resource

General Comment on Chapter 2

Facsimiles and reproductions: ALA notes that instructions for facsimiles and reproductions are given under Title (2.3.1.5), Edition (2.5.0.4), Numbering (2.6.0.4), Series (2.10.0.4) and even Resource Identifiers (2.12.0.4), but not under Statement of responsibility (2.4) Publisher (2.7), Place (2.8), Date (2.9) or Frequency (2.11). Is there a reason for this, or is it just an oversight? If there is a desire to make these sections consistent, wording based on 2.5.0.4 could be added at the comparable place in each of these sections (we have **not** listed these five instances below under our specific comments, however).

Comments on Specific Guidelines in Chapter 2

2.0. Purpose and scope. Is the last sentence here referring to other chapters in part 1? If so, it should probably be stated that way.

2.1. Basis for identification of the resource

We question why multilevel description isn't included here.

This guideline talks about “basis for the identification of the resource” while 2.14 talks about “basis for the description”. This appears to be a possible inconsistency. If the two are intending to be discussing the same concept, the terminology should be the same; but if they are discussing something different, the difference should be made clearer.

2.1.1. Comprehensive description. In this guideline, the basic instruction gets lost because of the formatting. We recommend adding an explicit reference to “Resources issued in one part” – as a header for the first paragraph. The numbering in this section might need to be adjusted accordingly. Since the bullets here apply to only three specific modes of issuance, it would be better to list them specifically here and in the contents for this section. The current wording only lists the exceptions.

2.1.1, 2nd bullet. The meaning of “separate” source is unclear, as it is not defined. Separate from what: physically detached? If the word “separate” were removed, would the guideline still mean the same thing?

2.1.1.1. Resources issued in successive parts

This guideline creates difficulties with its different instructions for multipart monographs that have successively issued parts and those with simultaneously issued parts. ALA is concerned that a cataloguer does not always know how a multipart monograph is issued, and therefore will not know which guidelines to use. If the practice as included in the draft of RDA goes forward, we recommend the addition of specific guidance for cataloguers regarding what to do if the mode of issuance for a multipart resource is not known.

Some reviewers were unclear whether the choices under the first bullet are all equal, or whether they are listed in some kind of priority order.

ALA finds the instructions in the choices under the first bullet to be very confusing, especially regarding what to do when multipart monographs are issued out of sequence. We recommend that the first two choices be removed, and the last two reworded as follows:

- ~~— i) a source of information identifying the first issue or part (i.e., the lowest numbered issue or part), if the issues or parts are sequentially numbered~~
- ~~— ii) a source of information identifying the earliest issue or part (i.e., the issue or part with the earliest date of publication, distribution, etc.), if the issues or parts are unnumbered or not sequentially numbered~~
- iii) a source of information identifying the lowest numbered issue or part available, if the issues or parts are ~~sequentially~~ numbered and the first issue or part is not available issued in sequence
- iv) a source of information identifying the earliest issue or part available, if the issues or parts are unnumbered or ~~not sequentially numbered and the earliest issue or part is not available~~ are numbered but issued out of sequence.

2.1.1.1, 4th bullet

ALA recommends moving this instruction to directly beneath the instructions in the 1st bullet, as it represents a specific instruction as opposed to a see reference concerning sources of information.

We also recommend adding a reference to instructions for making notes on the numbering peculiarities, including notes such as “Published out of sequence” and “Vol. 1 published in 2000” (when v. 2 was published in 1998).

2.1.1.2, Integrating resource, 1st bullet. We recommend adding references to areas of 2.2 to amplify and provided needed guidance on this instruction.

2.1.1.2, 3rd bullet. As in 2.1.1.1 above, this specific instruction should be moved above the reference about sources of information (i.e., move the 3rd bullet directly beneath the 1st bullet).

2.1.1.3. No source of information

Again, it is not clear what the word “separate” means here (see our comment above under 2.1.1)

2.1.1.3 a) “Resource issued as a single unit” and b) “Resource issued in two or more parts simultaneously” seem to be referring mainly to physical, rather than logical units, but it might be useful to include some examples to clarify this (see below)

2.1.1.3 a). Resource issued as a single unit

It is unclear what the phrase “use the sources of information identifying its individual contents” means. Does it mean “Use whatever sources of information provide identifying elements”? Or does it refer to cases where there is no unitary title page/screen for the resource as a whole but rather each section/work has its own identification?

We suggest adding an example of a resource issued as two or more logical units on a single physical medium (e.g., one videodisc containing multiple feature films without a collective title).

2.1.1.3 b) ... two or more parts simultaneously

We suggest adding an example here to show how b) almost always refers to a resource issued on more than one physical medium (e.g., a set of locally produced videodiscs with no collective title).

2.1.1.3 c). Integrating resource

This needs clarification because it is not clear if integrating resources are covered by the general information given in the first bullet. We question why integrating resources are split out from the general instruction here.

In 2.1.1.3c), it says that when an integrating resource has no separate source of information identifying the resource as a whole, to “use an alternative source issued in a) or b) above, as appropriate”. It is not clear under what circumstances one should apply

option a) “resource issued as a single unit” vs. option b) “issued in two or more parts simultaneously” to electronic integrating resources. Since they are integrating, would they be considered a “resource issued as a single unit”? Or would a website be considered “issued in two or more parts simultaneously” if it contained multiple files (PDF, mp3, moving image, etc.) of identifiable “works”, but not if it merely contained links to subsites (since this commonplace with websites)? Would a site containing two or more parts be considered “issued simultaneously” if the parts were not all added to the site at the same time (since the site is continually updated)? Some examples or further guidelines may help clarify this.

ALA recommends that the following exception be added to c) Integrating resources:

Exception: For replacement volume sets, choose a source of information identifying the latest part.

2.1.2. Analytical description

2.1.2 a). Single part. We suggest adding the word “article” in the parenthetical “e.g.” for clarity.

2.1.2 c). Parts of integrating resources. This instruction seems to assume that a component part of an integrating resource is also always an integrating resource, which is not always the case (there are occasionally newsletters issued as part of a printed integrating resource; a component part of an updating website can be a monograph or serial). ALA suggests including additional instructions to choose sources for component parts that are monographs, serials and updating resources as they would be treated if they were issued alone.

2.2. Sources of information

After discussing the approach to Sources of Information in the draft of part 1, ALA recommends incorporating certain principles originally proposed by LC in *5JSC/AACR3/1/Editor follow-up/1/LC response* into RDA dealing with Sources of Information. In that spirit, we offer the proposed revision below of the relevant guidelines. Our goal in this revision is to retain much of what is in the draft of RDA, but with the following major changes:

1. Expand what is considered to be “the resource itself”, as this term applies to guidelines for sources of information, to always include the container and accompanying material, with the goal of minimizing the use of bracketing in the description.
2. Emphasize that the source for the title proper should always be given if it is not taken from the preferred source, while adding an option to not record it if the resource only contains one title
3. Provide for additional options for preferring eye-readable sources for other materials in addition to moving images

4. Reorganize the categories to remove the section (2.2.1.2 in the draft) for “Resources comprising a set of graphic images”, which we found very confusing, and to provide an additional category for resources comprising sound, for which we think that additional guidance is needed.

Our proposed revision of 2.2.1 appears in its entirety after our comments on each section of 2.2.1.

2.2.1 Footnote. ALA strongly recommends a rewording that will include accompanying material, a container, and a home page through which a resource must be accessed as a part of the resource itself. This will result in much less information being bracketed in the description. We note that “redefining” resource is a tricky matter that would involve wording changes throughout RDA, so our approach here is to try to limit this only to guidelines related to sources of information.

2.2.1

We suggest adding an instruction for what to do with a resource that falls into more than one category of 2.2.1.1-2.2.1.4.

ALA finds the wording here (and also at 2.2.3) to be imprecise. We suggest that this be reworded as:

information related to elements that are required for the identification of the resource
...

2.2.1.1. The subsections under 2.2.1 in the draft seem to be lacking any instructions for **single** pages or page images. We recommend rewording 2.2.1.1 to clearly indicate that this category covers ALL resources comprising pages or leaves, as in the LC response document mentioned above.

2.2.1.1, 1st bullet. ALA proposes the addition of an option under the first bullet that would allow the use of the label on a physical object that contains electronic page images (such as a CD-ROM) to be used as the preferred source, in lieu of requiring the cataloguing agency to view the title page images. This would allow a continuation of the AACR2 practice, and would be in keeping with the spirit of the option under 2.2.1.3 in the draft to use an eye-readable label in preference to the title frames or screens for moving images.

2.2.1.1, 2nd bullet. ALA recommends the deletion of the second bullet, as the instructions are too print-centric and too prescriptive. The 3rd bullet has been reworded to accommodate this change.

2.2.1.1, 3rd bullet. ALA notes that the current wording is perhaps too narrow to accommodate current practice with E-books, which may contain an HTML “table of contents” rather than an image of the original title page. We recommend the following change to the wording to accommodate these resources:

... use the title page (or title page image, or other title page representation) ...

Several guidelines (such as this one) indicate giving preference to “formally presented sources”. While such a concept has been used in Chapter 9 of AACR2, ALA believes that it would be helpful to either define this concept or give examples of “formally presented sources” wherever this terminology appears.

2.2.1.2. Resources comprising a set of graphic images. As mentioned above, ALA recommends deleting the guidelines in this bullet regarding graphic materials, as this does not seem to be a logical grouping and needlessly complicates the guidelines.

2.2.1.3. Resources comprising moving images. [In our proposed revision, this guideline would be renumbered as 2.2.1.2]. In the 2nd bullet, b), the wording “electronic label” is confusing: we recommend changing this to “encoded metadata”.

2.2.1.3. Resources comprising sound [New]. ALA recommends the addition of a new guideline here to restore the provision of AACR2 rule 6.0B1 to prefer accompanying material or a container when the parts (discs, etc.) of a resource and its labels do not furnish a collective title.

2.2.1.4. Other resources. ALA recommends simplifying this instruction to preferring the resource itself, and restoring the concept from Chapter 9 of AACR2 to prefer the formally-presented source that provides the fullest information.

2.2.1 Proposed revisions:

2.2.1.1. PREFERRED SOURCE OF INFORMATION

Contents

- 2.2.1.1 Resources comprising ~~multiple pages or page images~~ or leaves (or images of pages or leaves)
- 2.2.1.2 ~~Resources comprising graphic images~~ Resources comprising moving images
- 2.2.1.3 ~~Resources comprising moving images~~ Resources comprising sound
- 2.2.1.4 Other resources

-
- Use as the preferred source of information a source within the resource itself¹ that is appropriate to

¹ For the purposes of selecting sources of information under 2.2 and in guidelines related to sources of information throughout RDA, consider “the resource itself” to include both the storage medium (e.g., paper, tape, or film) and any housing (e.g., a cassette or cartridge) that is an integral part of the resource, but excludes accompanying material, and any container that is separable from the storage medium and/or housing (e.g., a case or box), and any “home page” through which a resource must be accessed.

- a) the type of description (see 2.1)
and b) the presentation format of the resource (see 2.2.1.1–2.2.1.4).

- If a resource falls into more than one category under 2.2.1.1–2.2.1.4 (e.g. an atlas with descriptive text), follow the applicable guideline that appears first in the order below.
- If information related to elements that are required for the identification of the resource is not available from ~~a source within the resource itself~~ the preferred source of information, take it from another source within the resource itself or from another source as instructed in 2.2.3.

2.2.1.1. Resources comprising multiple pages or page images or leaves (or images of pages or leaves)

- For a resource comprising ~~multiple pages or page images or leaves~~ (e.g., a book or an issue of a periodical) or ~~page images of pages or leaves~~ (e.g., a microform reproduction of a musical score or a PDF file of a text), use the title page (or title page image or other title page representation) as the preferred source of information.
 - ◇ Optionally, use an eye-readable label permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g. a label on a CD-ROM or the header of a microfiche) in preference to a title page image or other title page representation that is not eye-readable.
- If the resource lacks a title page (or title page image), use as the preferred source of information one of the following (in order of preference):
 - a) a cover
 - b) a caption
 - c) a masthead
 - d) a colophon

or an image of one of the above (in the order of preference indicated).
- ~~If the resource does not contain any of the sources listed above,~~ If the resource lacks a title page (or title page image or other title page representation), use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.

2.2.1.2. Resources comprising a set of graphic images

- ~~For a resource comprising a set of individual sheets, cards, etc. bearing graphic images (e.g., a set of sheet maps, flashcards, slides, or transparencies) or a set of graphic images in a microform or digital format (e.g., microform reproductions of a set of sheet maps or a set of JPEG images of posters, etc.), use the title sheet, title card, etc., (or image of the title sheet, etc.) as the preferred source of information.~~
- ~~If the resource lacks a title sheet, title card, etc., (or an image of a title sheet, etc.) use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.~~

2.2.1.3-2.2.1.2. Resources comprising moving images

- For a resource comprising moving images (e.g., a film reel, a videodisc, a video game, or an MPEG video file, etc.), use the title frame(s) or title screen(s) as the preferred source of information.
 - ◇ *Optionally*, use an eye-readable label permanently printed on or affixed to the resource, excluding accompanying textual material or a container, in preference to the title frame(s) or title screen(s).
- If the resource does not contain a title frame or title screen, use as the preferred source of information, as applicable,
 - either* a) a label permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g., on a videodisc)
 - or* b) encoded metadata an electronic "label" in textual form (e.g., on an MPEG video file, etc.).
- If the resource does not contain a source of information falling into either category a) or b) above, use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.

2.2.1.3. Resources comprising sound

- For a resource comprising sound (e.g. a sound disc, an audio CD, or an MP3 file), use as the preferred source of information, as applicable.
 - either* a) a label permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g. on an audio CD)
 - or* b) encoded metadata in textual form (e.g., on an MP3 audio file, etc.)
 - or* c) accompanying textual material or a container, if it furnishes a collective title and the parts of the resource and their labels do not.
- If the resource does not contain a source of information falling into categories a), b) or c) above, use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.

2.2.1.4. Other resources

- For a resource other than one covered under 2.2.1.1–2.2.1.3, use as the preferred source of information as applicable, the resource itself.
 - either* a) a label permanently printed on or affixed to the resource (e.g., on an audio CD, a globe, or model)
 - or* b) an electronic "label" in textual form (e.g., on an MP3 audio file, etc.)
- If the resource does not contain a source of information falling into either category a) or b) above, use as the preferred source of information another source within the resource itself, giving preference to the formally presented sources that

provides the most complete information (e.g., a title panel on a folded sheet map, or the "home page" of a ~~an~~ HTML Web site).

2.2.1. Clean copy of proposed revision

2.2.1.1. PREFERRED SOURCE OF INFORMATION

Contents

- 2.2.1.1 Resources comprising pages or leaves (or images of pages or leaves)
- 2.2.1.2 Resources comprising moving images
- 2.2.1.3 Resources comprising sound
- 2.2.1.4 Other resources

-
- Use as the preferred source of information a source within the resource itself¹ that is appropriate to
 - a) the type of description (see 2.1)
 - and b) the presentation format of the resource (see 2.2.1.1–2.2.1.4).
 - If a resource falls into more than one category under 2.2.1.1–2.2.1.4 (e.g. an atlas with descriptive text), follow the applicable guideline that appears first in the order below.
 - If information related to elements that are required for the identification of the resource is not available from the preferred source of information, take it from another source within the resource itself or from another source as instructed in 2.2.3.

2.2.1.1.1. Resources comprising pages or leaves (or images of pages or leaves)

- For a resource comprising pages or leaves (e.g., a book or an issue of a periodical) or images of pages or leaves (e.g., a microform reproduction of a musical score or a PDF file of a text), use the title page (or title page image or other title page representation) as the preferred source of information.
 - ◇ *Optionally*, use an eye-readable label permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g. a label on a CD-ROM or the header of a microfiche) in preference to a title page image or other title page representation that is not eye-readable.
- If the resource lacks a title page (or title page image or other title page representation), use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.

¹ For the purposes of selecting sources of information under 2.2 and in guidelines related to sources of information throughout RDA, consider "the resource itself" to include the storage medium (e.g., paper, tape, or film) and any housing (e.g., a cassette or cartridge) that is an integral part of the resource, accompanying material, any container that is separable from the storage medium and/or housing (e.g., a case or box), and any "home page" through which a resource must be accessed.

2.2.1.2. Resources comprising moving images

- For a resource comprising moving images (e.g., a film reel, a videodisc, a video game, or an MPEG video file, etc.), use the title frame(s) or title screen(s) as the preferred source of information.
 - ◇ *Optionally*, use an eye-readable label permanently printed on or affixed to the resource, excluding accompanying textual material or a container, in preference to the title frame(s) or title screen(s).
- If the resource does not contain a title frame or title screen, use as the preferred source of information, as applicable,
 - either* a) a label permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g., on a videodisc)
 - or* b) encoded metadata in textual form (e.g., on an MPEG video file, etc.).
- If the resource does not contain a source of information falling into either category a) or b) above, use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.

2.2.1.3. Resources comprising sound

- For a resource comprising sound (e.g. a sound disc, an audio CD, or an MP3 file), use as the preferred source of information, as applicable,
 - either* a) a label permanently printed on or affixed to the resource, excluding accompanying textual material or a container (e.g. on an audio CD)
 - or* b) encoded metadata in textual form (e.g., on an MP3 audio file, etc.).
 - or* c) accompanying textual material or a container, if it furnishes a collective title and the parts of the resource and their labels do not.
- If the resource does not contain a source of information falling into categories a), b) or c) above, use as the preferred source of information another source within the resource itself, giving preference to formally presented sources.

2.2.1.4. Other resources

- For a resource other than one covered under 2.2.1.1–2.2.1.3, use as the preferred source of information the resource itself, giving preference to the formally presented source that provides the most complete information (e.g., a title panel on a folded sheet map, or the “home page” of a Web site).

2.2.2. ALA find the wording of this guideline, which has been pretty much carried over from AACR2, to be too wordy and confusing, and in need of revision. If time permits before publication of RDA, ALA would be willing to propose a rewrite for this guideline in order to simplify it and clarify its application, especially when more than one of the situations described in the instruction applies.

2.2.3. Other sources of information

The instruction from 2.2.3 in the draft:

If information required for the identification of the resource does not appear within the resource itself, take it from one of the following sources

seems applicable to all the areas of description listed in 2.2.4 (areas to be bracketed if taken from outside the resource). Yet other sections in RDA suggest that 2.2.3 is only applicable to selected data elements. For example, there is no reference to 2.2.3 in the “sources of information” sections for other title information, parallel title, or statement of responsibility. Instead, the instructions limit them to the same source of the title proper, or to sources within the resource. Meanwhile, the “sources of information” sections for edition statements; names, places, and dates of publishers, distributors, etc., and series title proper do contain references to 2.2.3, and make it permissible to obtain information from sources outside the resource. It would be helpful to clarify whether or not it is only applicable to certain data elements. If it is only applicable to certain elements, we recommend repeating some wording in 2.1.1 that appears at 4.1:

Information identifying the resource as a whole is generally taken from the resource itself. In certain cases the information may be taken from sources outside the resource as well. For further guidance on sources of information for the identification of a resource, see the instructions under specific elements in this chapter.

We also recommend changes to this guideline to take into account the expanded definition of what is considered part of the resource.

2.2.3 Proposed revision:

2.2.3. OTHER SOURCES OF INFORMATION

- If information related to elements that are required for the identification of the resource does not appear within the preferred source of information, resource itself, take it from one of the following sources (in order of preference):
 - a) another source within the resource itself accompanying material (e.g., a leaflet or an “about” file)
 - b) other published descriptions of the resource a container that is not an integral part of the resource (e.g., a box or case)
 - c) any other available source (e.g., a reference source) other published descriptions of the resource
 - ~~d) any other available source (e.g., a reference source).~~

2.2.3 Clean copy:

2.2.3. OTHER SOURCES OF INFORMATION

- If information related to elements that are required for the identification of the resource does not appear within the preferred source of information, take it from one of the following sources (in order of preference):
 - a) another source within the resource itself
 - b) other published descriptions of the resource
 - c) any other available source (e.g., a reference source).

2.2.4

ALA members hold varying opinions about the wisdom of requiring the use of square brackets even for information taken from outside of a resource. Several people commented that the use of square brackets is a presentation issue, and thus should be removed from the code altogether. Other comments pointed out that square brackets are meaningless to users, and that most other metadata communities do not use this technique and that as long as the source of the description is noted, then there should be no need to bracket information. It was also noted that the wording of the Exception to this guideline is so broad that it appears that each cataloguer could decide for herself what types of resources do not normally carry identifying information, since the guideline does not present a closed list. This would potentially present considerable differences in application of the Exception, and also argue for omitting the guideline itself.

On the other hand, most members of the Rare Books cataloguing community preferred to remove the exception, thus requiring the use of square brackets for all cataloguer-supplied data. ALA urges the JSC to continue to discuss the potential consequences of either keeping or deleting this guideline.

2.3.0.1. Broaden the second and third bullets to be less print-centric, especially explicitly covering Internet resources. For example: add “on a title bar” to the “e.g.” in the 2nd bullet.

2.3.0.2 Sources of Information. While instructions for recording the source from which a title is taken if it is not the preferred source appear at 2.3.8.3, ALA urges the JSC to repeat them under 2.3.0.2, to draw more attention to them. The simplification of instructions for selection of a preferred source will be most successful if there is also a corresponding emphasis upon always recording the source of the description if it is other than the preferred source.

2.3.0.2 Proposed revisions:

2.3.0.2. Sources of information

- When choosing a source of information for titles, apply the following general guidelines.
 - a) For the title proper, use the preferred source of information as specified in 2.2.1.
 - b) For other title information, take the information from the same source as the title proper.
 - c) For parallel titles, take the information from a source within the resource itself.
 - d) For variant titles, earlier and later titles, key titles, etc., take the information from any source either within the resource itself or outside the resource.

- For further guidance on sources of information for a particular type of title see the instructions under 2.3.1.2 (title proper), 2.3.2.2 (parallel title), 2.3.3.2 (other title information), 2.3.4.2 (variant title), 2.3.5.2 (earlier/later title), 2.3.6.2 (key title), 2.3.7.2 (devised title), and 2.3.8.2 (notes on titles).

- Follow guidance under 2.3.8.3 for recording the source from which the title proper is taken if it is a source other than
 - a) the title page (or title page image or other title page representation) of a resource comprising pages or leaves (or images of pages or leaves) (see 2.2.1.1)
 - b) the title frame or title screen of a resource comprising moving images (see 2.2.1.2).
 - c) the label of a resource comprising sound (see 2.2.1.3)

2.3.0.2 Clean copy:

2.3.0.2. Sources of information

- When choosing a source of information for titles, apply the following general guidelines.
 - a) For the title proper, use the preferred source of information as specified in 2.2.1.
 - b) For other title information, take the information from the same source as the title proper.
 - c) For parallel titles, take the information from a source within the resource itself.
 - d) For variant titles, earlier and later titles, key titles, etc., take the information from any source either within the resource itself or outside the resource.

- For further guidance on sources of information for a particular type of title see the instructions under 2.3.1.2 (title proper), 2.3.2.2 (parallel title), 2.3.3.2 (other title information), 2.3.4.2 (variant title), 2.3.5.2 (earlier/later title), 2.3.6.2 (key title), 2.3.7.2 (devised title), and 2.3.8.2 (notes on titles).

- Follow guidance under 2.3.8.3 for recording the source from which the title proper is taken if it is a source other than
 - a) the title page (or title page image or other title page representation) of a resource comprising pages or leaves (or images of pages or leaves) (see 2.2.1.1)
 - b) the title frame or title screen of a resource comprising moving images (see 2.2.1.2).
 - c) the label of a resource comprising sound (see 2.2.1.3)

2.3.0.3. Transcription, Exception

Please see our earlier comments at 1.6.8 on recording inaccuracies. ALA notes the same problem here as under 2.1.1.1: a cataloguer may not know whether or not a multipart monograph is issued successively or not, so may not know whether or not to apply the option.

ALA recommends that the Exception be expanded to also include integrating resources, and that comparable instructions be added under 2.3.1.7 a) to reinstate current practice under AACR2 12.1B1.

2.3.0.4, caption and 1st bullet. ALA recommends adding the word “family” after “person” (or “persons”), to be consistent with the revised wording of comparable guidelines. We also recommend that the reference explain WHY one should see 2.3.3.4, and that another reference be added to 2.4.0.10: “See also 2.3.3.4 for supplying explanatory other title information, and 2.4.0.10 for instructions for recording statements of responsibility”.

2.3.0.6. In the context of ingested information that is provided in an automated way, we question this being stated as a basic guideline and would prefer to see this instruction as an option under 2.3.0.3.

2.3.0.7. The relationship between this section and 2.3.1.6 is unclear. Does this section apply to single parts/sections/supplements only? If so, this should be clarified so cataloguers know when to use this and when to use 2.3.1.6.

2.3.1.1. Definition

ALA suggests that the JSC consider finding another term to replace “title proper”, which strikes many as outdated library jargon, especially with the adjective following the noun. Perhaps “primary title” would be a better alternative?

We also note that the rewording of part of the definition of title proper from “chief name” (in AACR2) to “chief title” in RDA may inadvertently cause confusion with the DCRM(B) concept of “chief title”, which in DCRM(B) is defined as the “distinguishing word or sequence of words that names a publication...” and which is distinct from “title proper”. The addition of the phrase “...when citing the resource” to the definition also seems to be causing confusion with the concept of “citation title”, since glossary definitions for parts 2 and 3 of RDA are not yet available.

ALA also suggests that we consider no longer treating alternative titles as part of the title proper, but as the variant titles they are intended to be instead, as this would likely better match user expectations. As others have pointed out, we are inconsistent already, in that we capitalize alternative titles, and generally exclude them from uniform titles.

2.3.1.4

The name of the section and the first sentence use different terminology. Pick either “title in two or more forms” or “more than one title”.

The exception should not have been limited to serials. AACR2 12.1B2 applies to both serials and integrating resources, and we would like to see this practice continued.

2.3.1.7. ALA recommends expanding the Exception for a) to also include integrating resources, as is the current practice under AACR2 rule 12.1B1. We also note the potential confusion mentioned above by treating multipart monographs issued over time from those that are simultaneously issued. A cataloguer may not know how a resource is issued, and may not know which guidelines to apply.

2.3.1.12

As mentioned above under our comments about 1.3, ALA would like to see RDA provide additional guidance for when a new description is needed for non-serials. It is unclear whether this instruction (2.3.1.12) applies just to serials or to other resources as well. If it only applies to serials, we recommend changing the heading to “Major and minor changes for serials”.

We recommend not putting long lists in running text, but using bulleted lists or tables instead. This would help readability, for example, at b) i).

2.3.2. ALA recommends that the JSC reconsider whether there is value in continuing the distinction between “parallel” information and other variants.

2.3.3.1. The definition of other title information already in the AACR2 glossary is superior to this definition; the term ‘subordinate’ that has been introduced into RDA would apply to titles of parts and sections (2.3.0.7) as well. ALA is very concerned that RDA should continue to make clear that titles of parts and sections are NOT considered other title information. To further emphasize this, we recommend changing the third bullet to:

- Other title information includes subtitles, avant-titres, etc., but does not include variations on the title proper (e.g., spine titles, sleeve titles)or designations/names of parts, sections, or supplements (which constitute part of the title proper; see 2.3.0.7).

2.3.3.2. Sources of information. If the parallel title is taken from a different source than the title proper, this instruction does not work. We recommend changing it to:

- Take other title information from the same source as the title proper (see 2.3.1.2) or parallel title (see 2.3.2.2) to which it corresponds.

2.3.3.3, 1st bullet. ALA recommends that this instruction be limited to serials and integrating resources. We are concerned that broadening this to monographs will force cataloguers to decide on a case-by-case whether or not to record this information, with a negative effect on cataloguer productivity as a result. It may also have a negative effect upon automated duplicate detection processes and copy cataloguing operations.

2.3.3.3, 3rd bullet. The option to record lengthy other title information as a variant title in some cases seems to be needlessly mixing two different data elements. We would prefer to see the data always recorded for what it is. This is an example of where it would be useful to clarify the role of “notes”, since this rule in AACR2 says to transcribe it in a note. When this directive is changed to recording it as a variant title, it no longer makes sense.

2.3.3.3, 6th bullet. This instruction is too restrictive for certain materials, in particular for cartographic materials and for early and rare printed resources. ALA recommends either adding an option to transcribe information related to the currency of the contents or the frequency of updating when it is considered to be important, or limiting the instruction to successively-issued and integrating resources.

2.3.3.4

ALA recommends adding “family” after “person”, to be consistent with other guidelines. The “etc.” could then be deleted.

On a broader note, we note that the instruction in 2.3.3.4 to add brief explanatory information in brackets as other title information in cases where the title proper is felt to be unclear runs counter to a general trend in RDA to transcribe what appears on the resource. Cf. 1.6.8 (relegating correction of typos to the note field) and 2.8.0.3 (relegating clarification of place names to the note field). Since decisions on what needs explanation are rather subjective, this provision will play havoc with indexing and with clustering of records. While noting that this would be a change from AACR2 practice, we suggest that this instruction could be deleted, and replaced with a reference forward to the appropriate instruction in Chapter 4 (4.3.0.3?) to describe the nature and scope of the content. (As an alternative, we’d like to see this bullet made optional, and appear after the 2nd bullet)

2.3.3.4 b). Members of the moving image archive community within ALA feel strongly that trailers that do not contain the word “trailer” in the title actually constitute untitled material, since the title does not describe the actual resource. ALA therefore

recommends that this instruction be moved to under 2.3.7.4, Devised Titles (see our comments in that section as well).

2.3.3.5, 2nd bullet. In the option under the 2nd bullet, we recommend adding the word “also”:

◇ *Optionally, also record the other title information in other languages.*

2.3.3.6 a) Multipart monographs and b) Serials. The last sentence of both a) and b) state:

If other title information that has been recorded is deleted on a subsequent issue or part, record the deletion in a note (see 2.3.8.4).

This blanket order, however, is modified by 2.3.8.4, fourth bullet, which makes clear that this deletion note is only required “if considered to be important.” ALA recommends including the phrase “if considered to be important” in 2.3.3.6 as well as in 2.3.8.4.

2.3.3.6 b) Serials. In the 1st paragraph, the see reference (see 2.3.5.6.b) points to an Integrating Resource instruction. Should this reference be to 2.3.5.6.a?

2.3.3.6 c) Integrating resources

In the 2nd paragraph, the 2nd and 3rd sentences have a see reference to 2.3.5.6.c but there is no such section; perhaps this reference should point to 2.3.5.6.b?

In the 2nd paragraph, the 2nd sentence says ‘earlier other title information’ and the 3rd sentence says “changed other title information.” These should probably both be “changed other title information” (i.e., consistency in these phrases may prevent future confusion).

ALA reviewers found this instruction very confusing, especially regarding the choice of verbs “record” vs. “retain”. In the final clause of each of these instructions, the instruction to “record it as earlier other title information” is confusing because the information has already been recorded; the cataloguer now simply must decide whether to keep it in the record or not. Somehow the concept of moving it from one data element to another must be conveyed in a less confusing manner. For example, the last sentence is rather confusing and appears to be contradicting itself. It would be much more clearly worded as:

If the changed other title information is not considered to be important (either for identification or for access), do not record it; instead, delete the original other title information and record it as earlier other title information if still considered to be important (see 2.3.5.6b).

2.3.4. Variant titles. ALA is concerned that the introduction of this new data element within RDA may cause confusion with the concept of variant titles for works, which should be handled in part 3 of RDA. Somehow the concept of variant titles for

manifestations needs to be conveyed here. Perhaps this element should be renamed “Other titles”?

2.3.4.1, 1st bullet. As we mentioned above under 2.3.3.3, other title information is not strictly speaking a type of variant title, and we would like to keep the two data elements from becoming confused. We recommend clarifying that “other title information” may have variant forms that need to be recorded.

2.3.4.1, 2nd bullet. We suggest adding “title screen” to the parenthetical.

2.3.4.1, 4th bullet. ALA is concerned that RDA state very clearly that the instructions in 2.3.5 cover only *minor changes* in the title proper. We recommend adding a reference here back to 2.3.11-2.3.12 for major changes in the title proper that require a new description.

2.3.5. ALA is very concerned that the introduction of this new section into part 1 may be very confusing to cataloguers. In common usage, the terms “earlier/later title” are associated with related resources (i.e. “work-to-work” or “expression to expression” relationships), while this section has nothing to do with this – these earlier/later titles are simply variant titles that represent minor changes – and only for certain types of resources depending upon mode of issuance. We recommend taking any instructions in 2.3.5 that are not covered elsewhere and folding them back into the section on variant titles (2.3.5) and not introducing these new and confusing concepts here.

2.3.5.1. In the 2nd bullet we recommend clarifying that “other title information” may have variant forms that need to be recorded (see our comment above under 2.3.4.1).

2.3.5.3. If Section 2.3.5 is retained, we recommend changing the heading of this section to: “Basic instructions on recording earlier/later titles not requiring a new record.”

2.3.5.3, 1st bullet. ALA recommends adding as a first sentence:

Record major changes to the title proper as instructed in 2.3.1.11.

2.3.5.3, 2nd bullet. Again, the wording references “later titles”, which typically signal “major changes” in title to serials cataloguers. We recommend changing the wording to:

- For later ~~titles~~ variations in title appearing in resources issued in successive parts, indicate the numbering or publication dates to which the change in title applies.

2.3.5.4 b). ALA recommends adding a reference:

See 2.3.1.12 for instructions on determining major and minor changes.

2.3.7. ALA recommends adding explicit references here to DACS and *Cataloging Cultural Objects* (CCO) in this section for devised titles for archival and visual resources, respectively.

2.3.7.3, 3rd bullet. “If the resource is of a type that would normally carry identifying information ... enclose the devised title in square brackets.” ALA notes that this exception is problematic, and suggests that it may be time to consider deleting it. However, we would recommend keeping the following bullet that instructs to note if a title was devised.

2.3.7.4 c). ALA recommends that the instruction at 2.3.3.4b regarding trailers be moved to this section, as we mentioned above under that guideline. The instruction could also be broadened to encompass all kinds of extracts from larger moving image resources besides trailers (such as dailies, alternate takes, bloopers, etc.). We also suggest changing all instances of “film” in this instruction to “film or video”.

2.3.8.3. This guideline will also needs minor revision to be consistent with previous recommendations. While ALA recognizes the importance of recording the source of title note if it is not taken from the preferred source, we also recognize that there are times when a resource only contains a single title on the resource itself. Since it should be obvious from examining the resource where the title came from, in these situations the cataloguer should have the option to NOT to record the source of the title.

2.3.8.3 Proposed revision:

2.3.8.3. Source of the title proper

- Record the source from which the title proper is taken if it is a source other than
 - a) the title page (or title page image or other title page representation) of a resource comprising ~~multiple pages~~ or page images or leaves (or images of pages or leaves) (see 2.2.1.1)
 - b) ~~the title sheet, title card, etc. (or title sheet image, etc.)~~ of a resource comprising a set of graphic images the title frame or title screen of a resource comprising moving images (see 2.2.1.2)
 - c) ~~the title frame or title screen of a resource comprising moving images~~ the label of a resource comprising sound (see 2.2.1.3)
- ◇ Optionally, if the resource bears only a single title and the title appears on the resource itself, exclusive of a container and accompanying textual material, do not record the source from which the title proper is taken.

2.3.8.3 Clean copy:

2.3.8.3. Source of the title proper

- Record the source from which the title proper is taken if it is a source other than
 - a) the title page (or title page image or other title page representation) of a resource comprising pages or leaves (or images of pages or leaves) (see 2.2.1.1)
 - b) the title frame or title screen of a resource comprising moving images (see 2.2.1.2)
 - c) the label of a resource comprising sound (see 2.2.1.3)

- ◇ *Optionally*, if the resource bears only a single title and the title appears on the resource itself, exclusive of a container and accompanying textual material, do not record the source from which the title proper is taken.

2.3.8.4, 2nd and 3rd bullets. ALA notes that if our previous suggestion for 1.6.8 regarding correcting an inaccuracy is followed, then the 2nd bullet may not be necessary and the 3rd bullet should be expanded to apply to all resources.

2.4. Statement of Responsibility. ALA would like to see more guidance about the types of corporate bodies and persons to transcribe as the statement of responsibility for different formats. For moving image resources, it would be helpful to reinstate the list from AACR2 7.1F (“e.g., producer, director, animator”); for spoken word recordings, narrators, and actors, etc.. While it is possible that RDA doesn’t list bodies appropriate for transcription in order to give cataloguers greater flexibility to apply judgment, listing some examples would make the guidelines easier for cataloguers to apply.

2.4.0.3. Option to provide an access point in lieu of statement of responsibility

ALA reviewers disagreed strongly about the appropriateness of this option, depending primarily upon whether they aligned themselves with cataloguing digital materials or other resources. We see this option as a prime example of a provision that has been added to RDA to accommodate the (legitimate) needs of the metadata community, but which could have significantly negative consequences for the consistency of library cataloguing if implemented without careful consideration.

The optional provision in this guideline to omit the statement of responsibility in favor of a controlled access point has implications for authority control that need to be carefully thought out. Many cataloguers who went through the transition from AACR1 to AACR2 remember that the lack of statements of responsibility in older records caused problems in determining predominant usage of names. Of course, without being able to review parts 2 and 3 of RDA, we don’t know what role “predominance” will continue to play in constructing controlled access points. However, if the fundamental principle in the FRAR model (that bibliographic entities are known by names and/or identifiers and those names and/or identifiers are used as the basis for forming controlled access points) is included within RDA (and we think that it should be), we are in danger of losing one of the ways that cataloguers working in shared environments learn about what those names are.

In addition to problems in identifying “commonly known” forms of names if there is no usage evidence, there is the problem of identifying relationships of entities (authors, illustrators, editors) to the work and to other entities/works if the statement of responsibility is not transcribed. While it is possible that part 2 of RDA will place more emphasis upon relator terms to identify relationships (which we would see as a positive step), it will never be as efficient to identify relationships by tagging access points in some way as explaining relationships as the prose evidence given in the transcription of the statement of responsibility.

Not recording statements of responsibility also covers up errors of identification by the cataloguer, and could cause problems with record matching in a cooperative cataloguing environment.

As described under our general comments earlier (regarding making the code work for both metadata and more traditional library applications), ALA suggests that wording be added to some options to explain their appropriateness for various resource description environments. For example, this option could be worded as follows:

- ◇ *Optionally*, in a resource description environment where documentation of usage for authority control and/or record matching and overlay are not of concern, in lieu of recording a statement of responsibility ...

Alternatively, the Option could link out to a separate document that would provide even more guidance for institutions that need to decide whether or not to apply the option.

Wording of the option: the option in this guideline is worded as though all that would ever be in a statement of responsibility is the name of **the** (singular) “responsible person”, i.e., the main entry. Statements of responsibility routinely name multiple responsible persons, families or corporate bodies, with multiple functions/roles. The option should be reworded accordingly.

2.4.0.5. Rather than indicating the omission using the ellipses ..., we suggest using the phrase “[and others]”. We acknowledge that we are getting away from Latin terminology (such as [et al.]), but ending the sentence just with the ellipses is not clear.

2.4.0.5, last paragraph. For clarity, we suggest changing the sentence to read, “If the members of a musical or artistic group...” if that is in fact what is implied.

2.4.0.6. We note the following inconsistency between 2.4.0.6 and 2.4.3.6: examples at these two guidelines show an editor credit in the statement of responsibility after the title, and an editor credit in the credits note. We recommend stating the general principle that when a work of collaborative authorship has multiple statements of responsibility for multiple functions, the statement of responsibility should contain those who are known to have made major contributions to the work as a whole or to whom major contributions are attributed. The distinction between recording some statements of responsibility in the statement of responsibility itself and others in notes needs additional consideration.

2.4.0.7. Titles of nobility ... ALA recommends deleting this guideline, so that information is simply transcribed as it is on the resource.

2.4.0.10. Statements of responsibility transcribed as part of the title proper or other title information. The word “of” and its equivalent in other languages (e.g. de, di) is problematic (as in the example in 2.3.3.3 “a selection of the bitter definitions of Ambrose Bierce”). Why should “of” should be treated differently than “by”, except that we’ve always thought that “of” made what follows it an “integral part” of what it precedes? They’re both prepositions. While there may be a difference between “of” and “by” (and

their equivalents in other languages) that makes current practice “correct”, can we justify it logically? Does this added complexity to transcription practice justify itself? If we want to continue current practice, we suggest that the instructions explicitly say here, and at 2.3.0.4 and 2.3.3.3, that “of” and its equivalent(s) in other languages is considered to make words following it an integral part of the title [or other title information].

Otherwise, we suggest that 2.4.0.10 could be deleted and left to cataloguer judgment.

2.4.3.1. Notes on statement of responsibility. Definition: delete “subsidiary” from the definition, since information may also need to be provided on those playing primary roles in responsibility.

2.4.3.1, 2nd bullet. As we mentioned earlier, we are concerned that we are mixing up the authority structures into the bibliographic description here with the phrase “variant forms of names”. We prefer the wording *information on other names* instead.

2.4.3.5. We recommend the following wording:

- Make notes relating to players, performers, etc., and other persons who have contributed to the artistic and/or technical production of a motion picture, ~~or~~ videorecording, or spoken word sound recording.

2.4.3.6. Suggested wording change:

- List persons ~~(other than the cast)~~ who have contributed to the artistic and/or technical production (other than on-screen or recorded participants) of a motion picture or videorecording and who are not named in the statement of responsibility. Do not include the names of assistants, associates, etc., or any other persons making only a minor contribution. Preface each name or group of names with a statement of function.

In this suggested change, commentator and narrator, even if voice-over on a moving image work, would be considered a recorded participant and be with cast, performer, etc., therefore “commentator, Derek G. Holroyde” in the example would be removed.

2.4.3.7. It is unclear whether “they” refers to notes or to person, families, etc.

2.4.3.8, bullets 1&2. Here again, we are mixing in data that belongs more properly in an authority record; we suggest making these guidelines optional, rather than the rule.

2.4.3.9. Change in statement of responsibility. This is the same as the header for 2.4.2. The contents in both sections are very much the same. Consider combining the two sections: merge the content of 2.4.3.9 with 2.4.2; keep the header for 2.4.3.9 and change the first sentence to “Make notes on changes in a statement of responsibility as instructed in 2.4.2.”

2.5. Edition

2.5.0.1 defines “edition information” and 2.5.1.1 defines “edition statement” in terms of “the edition to which a resource belongs”. However, everything hangs on what an

edition is. A definition of “edition” (or a link to it) is needed at the beginning of this section.

This guideline would benefit from a clear statement about the repeatability of data elements under 1.4 above. We would like to see this section include instructions addressing situations where a resource may have multiple edition statements relating to the resource as a whole. For instance, DVDs often have multiple edition statements, such as “Widescreen edition”, “Director’s cut”, “Special edition”. RDA includes an example in 2.5.0.3 (World’s classics ed., New ed. rev.), but it is not clear whether this is referring to multiple edition statements.

2.5.0.2

This guideline currently does not cover edition statements appearing on multiple sources. Many single-part Chinese and Japanese monographs carry one part of ed. information on the title page and another part in colophon, e.g., “Kaiteiban” [Rev. ed.] on the title page and “Shohan” [1st ed.] in colophon. Colophons are often more important than title pages in East Asian publications.

We recommend adding as a new 3rd bullet:

- If edition information appears on multiple sources within a resource, take it from these multiple sources if the information is important for identifying the resource.

2.5.0.6. Changes in edition information

a) Guidance for recording multiple edition statements on multiple sources within the resource would also be useful when all parts of a resource are issued simultaneously with multiple edition statements.

ALA recommends adding a reference to b): “(see 1.3 for instructions on when to create a new record)”; and to c) “(see 1.3 for instructions on when to create a new record).”

2.5.1.1. Edition, Definition, 2nd bullet. We suggest rewording the first sentence as follows, for clarity:

- Note that ~~“edition” statements in different~~ some languages may use the same term(s) to reflect printing edition information rather than as well as edition printing information. ...

2.5.1.3, 2nd bullet. We recommend adding “if considered to be important” to leave this to cataloguer judgment.

2.5.1.4. Terms indicating edition, vi). We recommend a reference from this to 4.11. Format of Notated Music. Note that the definition in 4.11.0.1 includes the phrase “physical layout”. How does that differ from what’s included here?

2.5.2.1. The definition as it stands would apply to a statement of subsidiary responsibility on an expression of a work that does not have a formal edition statement (such as

“illustrated by,” or “edited by.”) This definition needs to be linked to the presence of an edition statement. More broadly, however, given the new data dictionary approach, this raises the question about why statements of responsibility related to an expression are sometimes put into the statement of responsibility linked to the title proper, and sometimes put in a statement of responsibility linked to an edition statement. This is not logical or consistent.

2.5.5.3. We do not understand why digital resources are to be treated differently from any other type of resource in regard to the source of edition information. We suggest that this guideline be deleted.

2.6 Numbering

This section needs to be clearly indicated within the header that it is only applicable to serials. We suggest “Numbering (Serials)”. Cataloguers using the printed version in particular should not need to read the text of the guideline itself to discover that it is not applicable to what they are doing.

Organizationally, we recommend that this entire area be placed after 2.10, since it only applies to a small fraction of materials and the placement here is tied to the ISBD areas.

With the change within RDA to considering Numeric and/or alphabetic designation and Chronological designation as separate data elements, it is extremely important for RDA to add structural metadata or some hierarchical structure between data elements that will clearly associate these data elements with each other. Examples should be given showing the two data elements displayed together; some examples showing ISBD presentation would be especially helpful here.

Because users often do not understand the intended meaning of formatted numbering statements (which are time-consuming for cataloguers to create), ALA also recommends that RDA incorporate use of an unformatted note as an option for transcribing numbering.

2.6.0.2, 1st and 2nd bullet

This guideline requires that the cataloguer “take numbering information from the same source as the title proper” – and only if it does not appear there can the cataloguer “take it from another source within the resource itself.” This is a change from the current instruction in AACR2 12.0.B3, in which the prescribed source for numbering is “the whole resource”.

ALA recommends new wording in place of the first two bullets:

- Take numbering information for the first/earliest issue or part from any source within the resource, preferring a source with the most complete information.

2.6.0.2, 4th bullet. Again, it is not necessarily helpful to take numbering information only from the chief source. We recommend changed wording:

- Take numbering information identifying the last issue or part from ~~the source of information for that issue or part~~ any source within the resource with the most information.

2.6.0.2, 5th bullet. Again, the same problem exists as described above with needing information from the entire resource. Also, a cataloguer may have first and/or last issue for any given sequence of numbering. We recommend changing the wording:

Take numbering identifying the first and/or last issue or part in a separate sequence of numbering (see 2.6.5) from ~~the source of information for that issue or part~~ the entire resource, preferring a source with the most complete presentation.

2.6.2.1. A chronological designation may have more than 2 levels. We recommend changing the “e.g.” statement: “(e.g., year; year and month; year, day and month)”

2.6.7.1. We recommend that the definition for notes on numbering include “numbering errors” in the categories:

- A **note on numbering** is a note providing information on beginning and ending numbering not recorded in the numbering element, complex or irregular numbering, numbering errors, or the period covered by a volume, issue, part, etc.

2.7. Publisher, distributor, etc.

There does not seem to be explicit instructions on transcribing publisher, distributor, etc. information for facsimiles and reproductions. 2.7.0.2 says to take the name from the same source of the title proper, but the publication information on this source may be for the original work, and not the reproduction. (Example: the title page of a scanned PDF document of a book that was originally in print). Thus, there needs to be a section added to 2.70 talking about whether to obtain publisher information from the reproduction rather than the original.

The guidelines for recording name, place, and date relating to publication, distribution, etc., assume these data are presented in discrete packages on the resource. They also assume modern roles and relationships between publisher, distributor, and manufacturer. We suggest adding explicit optional instructions for early and rare printed resources to transcribe phrases as phrases, and to supply elements in square brackets in their designated element if they are transcribed as part of another element.

2.7.0.1 (3rd bullet), 2.8.0.1 (2nd bullet) & 2.9.0.1 (2nd bullet). Consider breaking each of these individual elements out into bulleted lists for clarity and readability.

2.7.0.3 b). We suggest deleting provision “b”. How is a cataloguer to know what is usual or unusual?

2.7.0.7 b). There is a reference to section/chapter 8.3. Is this correct?

2.7.1.3, 2.8.1.3, 2.8.4.2. The examples used to distinguish unpublished materials need to be broadened. We suggest adding “locally made recordings” to the “e.g.” list in the final bullet of these guidelines.

2.8.0.3. In general, ALA members prefer the AACR2 guideline to clarify the place within the element rather than providing a note, and would like to see that practice reinstated as an option.

2.8.3.2. ALA suggests adding a guideline for “Place of manufacturer not identified in the resource” similar to 2.8.1.3.

2.8.4.1. Is “production” primarily for or limited to unpublished materials? If so, then we suggest making this more clear. Some reviewers were confused about the difference between manufacture and production, and were also puzzled by the lack of a data element for “producer” to parallel “place of production”. We recommend making the definition more explicit. We also recommend that the definition be consistent with the list of terms used in 2.9.5.1 for Date of Production. The instruction should read:

... associated with the production, creation, fabrication, construction, etc., of a resource.”

2.8.4.2

There is no provision for a resource in an unpublished form, for which no place of production is known. We would like to see a parallel provision to 2.8.1.3 or explicit instruction that no place of production should be recorded, when no place of production is known for a resource in an unpublished form.

It is also not clear if this guideline applies to the accumulation of materials that form collections of personal papers and organizational records. If so, how is this information to be recorded? Individuals often live in a number of places and create/accumulate papers in those various locations; the same is often true of organizations. We suggest providing guidance on whether place of creation/accumulation of materials forming an unpublished, archival collection of papers or records should be provided in the description. We suggest that while date(s) of creation or record-keeping activity is appropriate for such materials, place is not (except as part of a scope/content note).

2.8.5.3. It would be desirable to indicate an element for recording place of production for moving image material, at least when considered important (as it is for entertainment materials). Ideally, this would be considered a new data element rather than a note.

2.9. Dates. Dates in the digital world present particular difficulties, and date notes are very problematic. When we’re asked in AACR/RDA to transcribe a particular date and “note” others, machine processing and conversion of records becomes very difficult. And, debating about which dates are more important than others becomes hard to defend. Most xml standards expect repeating dates, each in a separate element and typed accordingly. As many as necessary should be recorded and all recorded in the same data structure. RDA does not need to dictate that one date be transcribed and others noted. The image community cares when the painting was painted, not when the slide was taken. Date importance, particularly, is community specific & each content community should be allowed to give primary importance to whichever date it sees fit. If we are

interested in bringing in other communities, ALA is concerned that proscribing a singular date's importance in RDA is going to turn them off quickly.

2.9.0.2. The 4th instruction says from which issue to take the ending date of publication for a resource issued in successive parts, but says nothing about the beginning date. Is that elsewhere in the text? The 5th instruction says from which iteration to take the beginning date, but says nothing about from which iteration to take the ending date. Is something missing here?

2.9.0.2, 4th bullet. Many Chinese and Japanese monographic sets are released out of sequence. In such cases, the last numbered issue/part is not always the same as last released issue/part. bullet 4 may be clarified instead with:

- Take the ending date of publication, distribution, etc., for a resource issued in successive parts from the last released issue or part.

2.9.0.5. In the 4th paragraph, shouldn't "updating loose-leaf" be "integrating resource"?

2.9.1.3. ALA members expressed considerable concern about the new provision to allow the use of [date unknown] instead of estimating a date. This concern would be alleviated by restoring a variety of examples to the rule from AACR2, and by making the wording clear that [date unknown] should only be supplied as a last resort in those few cases where it would be very difficult or potentially misleading to estimate a date.

2.9.1.3, 1st bullet. We suggest deleting the first bullet, replacing it with instruction on mandatory-ness in 1.4 and 2.9.0.

2.9.1.3, 2nd bullet. ALA notes that it would be desirable to get away from using Latin abbreviations such as "ca." We recommend it not be used in the examples here as this may perpetuate the practice.

2.9.1.3, last bullet. The last bullet says "If the resource is in an unpublished form (e.g., a manuscript, painting, sculpture) record nothing in the date of publication element. See also 2.9.5" 2.9.5 covers dates of production for published resources, archival resources and collections but does not appear to cover dissertations. Since dissertations are considered unpublished, even the electronic ones, it appears no date is recorded. This needs to be corrected.

2.9.5.2. Recording date of production for a published resource: The way this reads the date can only be recorded in a note if it "appears" in a published resource. The instruction refers to 2.9.6 which says it can be taken from within or outside the resource. We prefer taking the date from any source.

2.9.5.3

See our earlier comments under 2.9 about the need for different dates in different communities. RDA needs to also allow date of original production for video materials, graphic materials, and sound recordings.

We also see no reason to limit this instruction to archival resources or collections, since individual objects may be created over a span of dates, or on a known day (May 4, 1563), or may have an unknown, but estimated creation date. The guideline should be recaptioned: “Recording date of production for an unpublished resource or collection”, and the term “unpublished resource or collection” substituted for “archival resource or collection” throughout the guideline.

2.9.6.3. Potential conflict between 1st & 3rd bullets: Based on the current wording, we wonder if a note about the date of recording would be considered appropriate if there were also the year of publication of the resource. If not, that would be an unwelcome change from current practice.

2.10.0.4. The current wording does not explain what to do if the facsimile or reproduction only has series information relating to the original manifestation. We recommend changing the 1st bullet to:

- When describing a facsimile or reproduction that has series information relating to the original manifestation as well as or instead of to the facsimile or reproduction, record the series information relating to the facsimile or reproduction if available. Record the series information relating to the original manifestation in a note (see 4.10.2).

2.10.1.4. This instruction appears to straddle what logically belongs in part 1 and what may more logically belong in part 3 on Authority Control. We suggest either removing the last sentence or at least presenting it as an option.

2.10.2.2. Parallel titles are being treated differently here than they are in 2.3.2. This is likely to cause some confusion. 2.3.2.2 says to take parallel titles from any source within the resource. If cataloguing the series as a serial, this guideline would apply to the record created. But given that there is an order of preference in 2.10.2.2 (i.e., stop recording parallel titles after whichever bullet first applies) the descriptions created for the serial and the series transcription (even if based on the exact same issue or part) could look different. Are such disparate results really desired? If not, the instruction here should be to take parallel titles from any source within the resource. (Another suggestion offered by ALA members was to move parallel titles for series to authority records).

2.10.5.2 and 2.10.5.3. Do these guidelines imply that we are specifically limited to taking the ISSN from the resource itself? Additionally, how does this relate the instructions in 2.12.1.3? There needs to be an instruction that clarifies that when the ISSN is incorrect do not apply instructions in 2.12.1.3 (if that is indeed the intent).

2.10.6.3. See our earlier comments on correction of inaccuracies. We would prefer to have the incorrect information corrected in the element itself, with the inaccuracy recorded in brackets.

2.10.6.4. We note an inconsistency between this guideline and 2.6 regarding the recording of both enumeration and chronology when both are present.

2.10.6.7, 1st bullet, a). There is no provision for multipart monographs published in successive parts (as opposed to simultaneously issued) within a parent series. We recommend expanding the scope of this provision to incorporate all multipart monographs.

2.10.6.7, 1st bullet, b). There are occasional instances (usually with ceased serials) when all of the series numbers are known, and it is helpful to include these numbers in the record. We suggest adding an option that would allow recording all of the numbers.

2.10.7, 2.3.0.7. Subseries; Titles of parts, sections, and supplements. The instructions for series/subseries are somewhat confusing: “record both the title proper of the main series (1.10.1) and the title proper of the subseries”. Does this mean that Series/subseries are recorded in a single data element, as is done for Common title/part title (i.e., per RDA 2.3.0.7)? This needs clarification.

2.10.7.4, 1st bullet. In some cases, 2.10.7.4 would contradict 2.10.1.2 as to the choice of main series titles proper. Many Japanese resources have a situation: Language of the main written, spoken, or sung content of the resource: Japanese; Script of the main written, spoken, or sung content of the resource: Chinese; ser. t.p.: none; t.p.: English series title alone; colophon: Japanese series/subseries title alone OR English and Japanese series/subseries titles. In such cases, application of 2.10.1.2 would result in recording of the English main series, while application of 2.10.7.4 would result in recording of the Japanese main series. Irreconcilable provision in 2.10.7.4 and 2.10.1.2 regarding the choice of main series titles proper should be resolved.

2.10.7.4 may be modified to read instead:

- If the main series and subseries titles appear in more than one language or script on the same source as the main series title, record as the title proper for the ~~main series and~~ subseries the ~~titles~~ title in the language (or the clearly predominant language) of the particular resource being catalogued. If this criterion is not applicable, ~~record the first main series and subseries titles that are in the same language as each other~~ choose the subseries title proper on the basis of the sequence or layout of the titles on the source of information.

Without clear guidance, inconsistency in application might ensue. As to the choice of main series title proper, 2.10.1.2 and 2.10.1.3, which refer cataloguers to 2.2.1, 2.2.3, and 2.3.0, with further reference to rule 2.3.1 (which encompasses 2.3.1.3), provide unequivocal instruction. No separate instruction, especially a conflicting one, should be made regarding main series title within 2.10.7 for subseries.

2.10.7.6. The phrase “second series” is confusing here, especially coming right after 2.10.7.5 which explicitly includes “Second series” in its caption (and deals with an entirely different concept). The guideline also ignores the fact that there may be three or more series involved. It would be clearer to say “separate series”. ALA recommends changing the guideline to:

2.10.7.6. Subseries or ~~second~~ separate series

- In case of doubt about whether ~~one of the titles~~ a series title is a subseries or a ~~second~~ separate series, treat it as a ~~second~~ separate series (see 2.10.8).

2.11.0.3. Notes should be allowed for frequency, for example, in cases where the stated frequency differs from the actual frequency.

2.12.0.1, 1st bullet. Because music plate numbers are encompassed by this definition, it is incorrect to state that resource identifiers are “uniquely associated” with the resource; plate numbers are sometimes reassigned from one manifestation to another. Perhaps the addition of “usually” or “normally” would help.

2.12.0.1, 4th bullet. We suggest not using the term *document* to mean *resource issued by a governmental body*, as this is library jargon and not in general use.

2.12.0.4. ALA recommends that this data element be made repeatable so that identifiers for the original and for a reproduction can both be recorded. (Or, they need to be defined as separate data elements)

2.12.1.3. If RDA makes a distinction between invalid and incorrect numbers, these need to be clearly defined. We assume invalid means syntactically improper (too many or too few characters, invalid characters, etc.), while incorrect means semantically improper (is not the correct number for this resource).

2.1.1.3, last bullet. The use of parentheses is a presentation issue. Is it appropriate here?

2.12.1.4. Add “of the same type” to the end of the first sentence. Delete the second sentence; this data does not need to be standardized.

2.12.2.2. Was it intentional to change the punctuation treatment in the option from use of a “dash” (AACR2) to a “hyphen” (RDA)? This change will cause problems when transcribing music publisher numbers that already include a hyphen as an integral part of the number, unless the data element is simply made repeatable.

2.12.2.3, 3rd bullet. The conflicting instruction in 2.12.2.3 and 2.12.0.4 should be resolved. Because this element can be extremely important for identification of a musical score, however, relegating it to a note is not an acceptable solution. We recommend creating a separate data element for identifiers for the original.

2.13.0.3. We question whether the use of the term “brief” results in user-friendly reference, especially if it results in the use of obscure abbreviations. We suggest deletion of the word “brief”. (We understand that the footnoted document is being revised to reduce the use of abbreviations). Please also clarify that the footnoted document is not the only document that might supply a “common form of citation”.

2.14. This guideline talks about “basis for the description” while 2.1 talks about “basis for the identification of the resource”. This appears to be a possible inconsistency. If the two are intending to be discussing the same concept, the terminology should be the same; but if they are discussing something different, the difference should be made clearer. (see also our comments under 2.1 above).

2.14.1

For all kinds of resources, ALA recommends that the notes on earliest and latest parts consulted be kept separate, which is current practice.

Many Japanese multipart monographs are released out of sequence. In such cases, the first numbered issue/part is not always the same as the first released issue/part. We suggest clarifying the first portion of bullet 1 with:

- For serials and multipart monographs, if the description is not based on the first released issue or part, identify the issue or part used as the basis of the description (see 2.1.1).

Chapter 3. Technical Description

General Comments on Chapter 3

ALA feels that the present draft provides a much better structure for technical description than the 2004 AACR3 draft. However, the chapter is still cumbersome, complex, and will be difficult to use. Much of this is due to the retention of almost all of the rules from AACR2. ALA would like to see some attention devoted to the simplification of this chapter.

One aspect of complexity carried forward from AACR2 is the unwarranted amount of attention given to the guidelines for recording the extent of printed books. This seems to be due to the complex, but well documented, conventions of this traditional format, which was covered in great detail in Chapter 2 of AACR2. While these guidelines may still be needed, the merging of guidelines for all formats into a single sequence gives the impression that RDA is still being written primarily for books.

ALA found it difficult to review the guidelines for extent and for dimensions in the absence of a final list of media and carrier categories. In the following comments, ALA has recognized that anything related to these elements will need to be revised and has refrained from commenting. However, this should not be taken as evidence of satisfaction with the present draft.

Comments on Specific Guidelines in Chapter 3

3.1.1. Sources of information. ALA received a number of comments indicating confusion with this guideline, although it is taken *verbatim* from AACR2 1.5.A2. We suggest that the JSC consider revising this guideline, which is repeated in the comparable guidelines for each specific element in Chapter 3. The problems raised by ALA include:

- a. The meaning of the distinction between explicit and implicit information is not clear.
- b. The relationship between the two sentences is unclear.
- c. In the context of Chapter 3, the “resource itself” must be very broadly defined, as there are specific guidelines referring to accompanying material and containers. ALA has made a recommendation to revise the footnote at 2.2.1 to deal with this more generally; however that recommendation is decided, the case of Chapter 3 must be dealt with appropriately.

ALA recommends the following substitution for the draft guideline 3.1.1:

- Base the technical description on evidence presented by the resource itself, including any accompanying material or containers. If desired, take additional evidence from any source.

3.1.4. The status of accompanying material in this guideline needs to be clarified.

3.1.4 b). Is “distinct type of media” the same as “carrier”? Does it include electronic resources digitized available in both PDF and HTML formats?

3.4. This section needs a section on changes, analogous to 3.5.0.7.

3.4.0.1. The terminology is still confusing. The difference between *unit* and *subunit* is not clear. Chapters would fall within the current definition of unit, which isn’t what is wanted here. The meaning of “formal constituent” is not clear.

3.4.0.3 and 3.16.13.8

ALA received the following comment, which we ask the JSC to consider, although it is a change to AACR2 practice. If the JSC is interested, ALA would be willing to develop a proposal.

The specification of the television or videorecording system should be a part of the name of the type of carrier. A VHS videocassette is a completely different carrier from a Beta videocassette; it needs different equipment for playback, takes up a different amount of space on the shelf etc. Including this specification in the name of the carrier would bring RDA into compliance with *AMIM* and the practices of the moving-image archival community. There is plenty of evidence on the OLAC and AUTOCAT discussion lists over the years that other moving-image cataloguers would find this approach useful as well. (From Martha Yee, UCLA Film and Television Archive)

3.4.0.3. This guideline contains an instruction to use abbreviations as instructed in Appendix B. It would be helpful to repeat the option stated at 1.6 to use in-house guidelines or external standards instead of the appendix.

3.5.0.4

A number of guidelines – such as 3.5.0.4 first bullet, 3.6.5.5 last bullet, 3.6.5.8, 3.6.9.3 first bullet, 3.6.11.3 second bullet, 3.6.13.6, 3.9.0.3 – reference characteristics that are “common” or “typical” of the medium. This is not helpful to cataloguers working with materials with which they are unfamiliar, which happens frequently. If standardization is desired, it would be preferable to identify what is typical.

There are a number of persistent issues regarding cartographic material. Although final resolution must wait until final lists of media categories and types of carrier are available, we would like to make the following points: (a) While not all cartographic resources are printed, all cartographic resources are graphic representations of spatial information – with the exception of globes, which are three-dimensional resources. (b) There continues to be ambiguity about the significance of the term *map*. To the extent that maps may be presented on slides, jigsaw puzzles, etc., *map* is a type of content. As a type of carrier, however, the term *map* identifies a map on one or more sheets. This ambiguity needs to be kept in mind when defining and using this term in Chapter 3.

3.4.0.5, 1st bullet. Delete “in arabic numerals”; there are many cases in which roman numerals are used in recording number of subunits (e.g., 3.4.1.1, 3.4.1.17).

3.4.0.6

It is unclear whether the terms *unit* and *part* refer to the same thing. If there is a distinction, it needs to be made explicit.

ALA received many comments suggesting that leaving the number of units blank for incomplete resources is not helpful to users, especially when combined with the indecipherable abbreviation “v.” The original reason for leaving a blank space was so that the number could be typed on the cards when the resource was completed; however, that is no longer how most agencies revise bibliographic descriptions. We suggest that some sort of explicit indication be given that (a) there are multiple units and (b) the final number is not yet known because the resource is incomplete.

3.4.0.8. This guideline uses the term “item” in its archival meaning, which is not exactly the same as the FRBR meaning. Even if the Glossary includes both meanings, the use of the term in the non-FRBR sense should be avoided – or it should be explicitly stated that it is being used in the archival sense in any given case.

3.4.0.10. Problems arise in this section because the rules for sound recordings and moving images have been combined. For example, instruction b) remains critical for AV material but has not carried the same importance for sound recordings. The instructions here would now require a statement of duration (or an estimate) for sound recordings

unless it cannot be approximated. This would be a significant change from AACR2 and does not seem to be warranted.

3.4.1. There seems to be inconsistency throughout 3.4.1 regarding the use or non-use of brackets around the numbers of pages, leaves, plates, etc.

3.4.1.1. ALA notes that this guideline fails to deal with the very common situation of complex numbering such as A-1 through A-15, B-1 through B-5, etc. – not to mention the numbering pattern of the RDA draft itself. This should certainly be dealt with in examples, but it would be helpful to clarify this in the text of the guideline itself.

3.4.1.1, 1st bullet. According to paragraphs a) and b), the pattern of printing governs the recording of numeration. ALA feels that it makes no sense to record the number of pages when only the leaves are numbered or the number of leaves when the pages are numbered. This would result in statements like “48 [i.e. 96] p.” instead of “48 leaves.” These two paragraphs should be patterned on the treatment of columns in paragraph c). The extent statement should record the numbering of the resource.

3.4.1.2–13. While some of the guidelines in 3.4.1.2–3.4.1.13 explicitly note the exception for early printed resources and refer to 3.4.1.17 (e.g., 3.4.1.4), most do not. ALA assumes that 3.4.1.17 is an exception to any applicable guideline in this section, but suggests that it might be helpful to make this explicit.

3.4.1.2, 1st bullet and 3.4.1.14–16. ALA continues to urge that an option be provided to record “1 v. (unpaged)” or similar wording, rather than requiring the cataloguer to count or estimate the number of pages or leaves. ALA made this same recommendation on the 2004 AACR3 draft (decision table #453); the JSC has not discussed this recommendation, although a number of constituencies indicated disagreement. ALA would like the JSC to discuss the issue.

3.4.1.5, 1st bullet. If the item is not described in terms of pages, ‘+ p.’ would be inappropriate. Change this so that what follows the + corresponds to how the resource is described.

3.4.1.7 c). This guideline suggests that atlases are only described as “1 atlas” when they have complicated paging. The present convention of recording “1 atlas” followed by number of pages needs to be supported. It is important that both the nature of the resource (atlas) and its extent (number of pages, leaves, etc.) be recorded.

3.4.1.14–16. There is no provision for resources comprising two or more units that corresponds to 3.4.1.7 and deals with complicated or irregular paging. In particular, the provisions of 3.4.1.7 c) for adding “(various pagings)” could usefully be applied to works on more than one part.

3.4.1.14. There was considerable confusion about what “as instructed above” referred to. Assuming that it refers to the bullet immediately above the option, there needs to be a better way to say this.

3.4.1.16. ALA would like to suggest that the JSC reconsider the inclusion of this guideline in RDA. The result is incomprehensible to users, and its provisions are difficult to explain to cataloguers and for them to apply. It is also difficult to apply the instruction without becoming confused about physical units as issues vs. physical units as bound by the local library. For serials (which seem to be included in the scope of the guideline), it represents a significant change in current practice. The value of this particular guideline is questionable, and we suggest it is time to delete it.

3.4.1.17, 1st bullet. This instruction is a contradiction to 1.6.2.1: “Use lowercase roman numerals in paging or page references even when capitals appear in the resource.” This provision of 3.4.1.17 represents standard practice for early printed resources. The contradiction with 1.6.2.1 needs to be resolved in a way that will allow this provision in 3.4.1.17.

3.4.3.2, 1st bullet. The option to give the number of sheets is a significant change from AACR2 and we do **not** support it; the number of maps and the number of sheets should **always** be given in the extent.

3.4.3.2, 2nd bullet. AACR2 rule 3.5B2 dealt with “map series.” The meaning of this rule has been changed in the text of 3.4.3.2. The second bullet in 3.4.3.2 omits the critical point – that “map series” should be described collectively. AACR2 3.5B2 said “treat it as a collection and record the extent ...”; if this does not fit the RDA definition of a collection, perhaps this guideline could say “treat it collectively [or comprehensively] and record the extent ...” Without this instruction here, there is no justification in the code for the current conventions for describing cartographic resources that are a hybrid of successively-issued and integrating resources.

3.4.3.3. The restructuring of AACR2 rule 3.5B2 has entirely omitted the situation of segments on more than one sheet. The following rewording will correct the omission:

3.4.3.3. Maps, etc., presented in two or more segments

- If the maps, etc., are presented in two or more segments designed to fit together to form one or more maps, etc., and all the segments are on a single sheet, record the number of complete maps, etc., followed by *in* and the number of segments. If the segments are not all on one sheet, record the number of complete maps and the number of sheets.

1 section in 4 segments

2 views in 6 segments

- ◇ *Optionally*, omit the specification of the number of sheets or segments from the extent and, if desired, record such information in a note (see 3.4.5.11).

2 views

Note: Each view in 3 segments

3.4.4. Digital files, etc.

The guidelines should clarify whether these instructions apply to digitally-encoded audio resources.

ALA will also be making recommendations regarding guidelines for technical description of digital media (5JSC/ALA/2). These recommendations are likely to include (a) recording playing time for digital resources when appropriate, and (b) recording the file format and file size as part of the extent statement, when this can be done succinctly.

3.4.5.4. This practice has previously only been applied to multipart monographs. It is not clear that the concept of a **serial** that is “not to be continued” differs from a serial that has ceased publication (2.6.4 and 2.6.7.3). It strikes us that the concept addressed in 3.4.5.4 is meaningful **only** in the case of a determinate publication, i.e., a publication planned to be completed but, in the event, was *not* completed.

3.4.5.5 1st bullet. It should be clearly stated that this guideline only applies when the duration of each part is stated, implied or can be approximated. There should be also be a provision for recording durations of separate parts contained in the resource with a collective title.

- When preparing a comprehensive description for a resource with or without a collective title, make a note giving the durations of each part contained in the resource if it is stated, implied, or can be approximated.

3.4.5.7. Duration of performance for scores, parts, etc. This guideline needs to support listing durations of sections.

3.4.5.5–3.4.5.7. Because playing time may also appear in a contents list, according to the option in 4.7.0.3., references to that guideline should be made here.

3.4.5.10, 2nd bullet. The measurements of woodblock frames as well as the number of characters per line are important elements for identifying editions of East Asian early printed materials. It should be included in the instruction. Change text to read: “Make notes on the number of columns or lines, and the type measurements, etc., if they are considered to be important.” This will allow other elements to be included in the note. This would be a revision to an AACR2 rule, but ALA feels that this is justified in the interests of internationalization of RDA.

3.5.0.3 and 3.5.0.4. These guidelines refer to each other, creating a loop and making it unclear which one takes precedence. The relationship between them should be clarified.

3.5.0.3

This guideline contains an instruction to use abbreviations as instructed in Appendix B. It would be helpful to repeat the option stated at 1.6 to use in-house guidelines or external standards instead of the appendix.

The instruction to apply 3.5.0.4 should be expanded to include 3.5.0.4–3.4.0.7.

3.5.0.4, 1st bullet. ALA notes that the use of inches vs. centimetres is not specified for all resources in the table in 3.5.0.3. Either such instructions should be added, or the final sentence of this guideline should read “... as indicated in the table under 3.5.0.3 or in the guidelines referenced in the table.”

3.5.0.4, 2nd bullet. There is a contradiction between the general instruction here to express dimensions “in centimetres to the next whole centimetre up” and the option in 3.5.3.1 to record tenths of a centimetre.

3.5.0.5. This guideline needs an exception for cartographic resources; the dimensions for a container would **never** be the only measurement given.

3.5.0.6, 1st bullet

The meaning of the term “materials” is unclear, especially in reference to a multipart resource.

ALA recommends that the use of the word *each* be an option when needed for clarify, not a standard instruction. It is not current practice to use the word *each* when describing multipart monographs and serials, and we see no compelling reason to begin doing so. We also note that there is no comparable instruction in 3.5.2.2 to add the word *each* for scores, parts, etc.

3.5.1. Atlases are a great example of a type of resource that fits into two categories, and RDA needs to give principles for handling such multitype resources.

3.5.1.1, 2nd bullet. There may be a conflict between this guideline and 2.2.1. A binding would be considered a housing that is an integral part of the “resource itself.”

3.5.1.3. If this guideline applies to the binding of a local copy, it needs to be moved to Chapter 6. If it applies to units **issued** together in a common binding, then that is what it should say.

3.5.1.4

Because it is not always possible to determine the format, it might be preferable to make this guideline optional.

The list of formats applies only to Western practices and not (for example) to early Japanese printed books.

3.5.2.2, 2nd bullet. As written, this guideline leaves some ambiguity about recording dimensions for a score and set of parts that are all the same height. Per 3.4.2.2, separate extent statements should be made – one for the score and one for the set of parts. However, in this bullet (in 3.5.2.2.), it appears that the dimensions should only be recorded once, as long as the height is uniform. If separate extent statements are created in this situation, shouldn't the dimensions be associated with each statement, even if the height is the same? The reference to 3.5.1 doesn't help, since a parallel situation does not appear there.

3.5.3.2. This guideline is based in part of AACR2 rule 3.5D1, but has not been accurately rendered. Change this to:

3.5.3.2. Map, etc., on two or more sheets

- If the map, etc., is on ~~two~~ sheets of ~~differing~~ two sizes, record both sets of dimensions. If the sheets are of more than two ~~differing~~ sizes, record the greatest height of any of them followed by the greatest width of any of them and *or smaller*.

3.5.4. Unbound manuscript texts. These instructions should also apply to other manuscripts, such as scores.

3.6. ALA notes that this grouping of elements, as well as its name, is a carryover from the ISBD structure. If our recommendation to identify high-level data elements is accepted, it should **not** be applied to “Other technical details”; these should be treated as individual and independent data elements. Further, we suggest changing the terminology here to “Technical details” – or perhaps “Technical attributes.”

3.6.0.3. This guideline contains an instruction to use abbreviations as instructed in Appendix B. It would be helpful to repeat the option stated at 1.6 to use in-house guidelines or external standards instead of the appendix.

3.6.0.3, 1st bullet. The list of elements isn't needed.

3.6.3.3. We are not convinced that this guideline should cover reproduction. “Record the method of production in general terms (e.g., engraving, lithograph) or specific terms.”

3.6.5.3, 2nd bullet. If a distinction continues to be made between a formal statement and a note, then there is a contradiction between the option in 3.6.5.3 and the instruction in 3.6.13.8 a). Either it needs to be clear that the option in 3.6.5.3 should **not** be applied to videorecordings or 3.6.13.8 needs to acknowledge that sound characteristics may be recorded in a formal statement.

3.6.5.5 and 3.6.11.3. Frames per second (fps) is treated as a sound characteristic in 3.6.5.5 and a projection characteristic in 3.6.11.3; it actually is a way of expressing **playing speed**.

3.6.5.10. SACD and DVD (encoding formats for optical media) do not belong in a list with Dolby and NAB (equalization standards for magnetic tape).

3.6.6.1. The definition is inadequate. Illustrative matter may itself be the primary content of a resource, with text being there to support the illustrations (as implied in 3.6.6.4).

3.6.6.3, 1st bullet, option. ALA received the suggestion to remove the list of specific types of illustrations from this guideline. Although this is carried forward exactly from AACR2 2.5C2, ALA feels that the list is unnecessary and its removal would make RDA seem less text-oriented. The proposal (from Ed Glazier of RLG) was to revise the option as follows:

- ◇ *Optionally*, if the illustrations are all of one or more ~~of the following~~ types, and are considered to be important, record the appropriate term(s) or abbreviation(s) ~~in alphabetical order: e.g., maps, music, plans, portraits, samples, computer drawings, architectural drawings.~~

~~coats of arms
 facsimiles
 forms
 genealogical tables
 maps
 music
 plans
 portraits (use for both single and group portraits)
 samples.~~

~~If none of these terms adequately describes the illustrations, use another term as appropriate.~~

~~coats of arms, facsims., ports.~~

~~computer drawings~~

3.6.6.3

This guideline should be applied to atlases, but not to other types of cartographic material. Somewhere in this chapter, it should be made clear that cartographic resources other than atlases (which are books) and globes (which are three-dimensional) should be considered to be graphic resources.

Please clarify whether ‘mixed’ or ‘multimedia’ would be considered graphic and thus not have illustrative matter.

3.6.6.3, 2nd bullet, last option. We request the replacement of “*metal cuts*” with another type, even though this list appears in AACR2. Although metal cuts are a valid method of illustration, it is a very rare type, restricted almost entirely to 15th century German books. Furthermore, a long-standing misuse of the term “metal cuts” in various incarnations of the rare book cataloguing rules, based on a mistaken equating of “metal cuts” with “engravings,” has recently come to light. This error appears in thousands of bibliographic records, and we want to do everything possible to avoid perpetuating the error. We suggest using “(*woodcuts, lithographs, etc.*)” instead.

3.6.6.4, 1st bullet. It is not clear what the term “type of resource” means, which is problematic in connection with this guideline. For instance, is an art exhibition catalogue a “type of resource” and thus shouldn’t 3.6.6.4 be applied? The “type of resource” within the context of 3.6.6.4 should either be defined or rephrased with more explicit instruction.

3.6.7.1. Colour does not mean the name of the colour(s) used in production but rather *presence of colour* in the resource. It should also be acknowledged that the concept of colour in RDA is not confined to graphic images.

3.6.7.3, 1st bullet

“Colour illustration” is the standard term in graphic materials cataloguing and the art world, where it is distinct from “coloured illustration,” indicating an illustration that became “coloured” only when hand-colouring was applied. See Glaister’s *The Encyclopedia of the Book*.

The second sentence, in the corresponding AACR2 rule, is an exception for cartographic resources. It is not clear that the concept can be more widely applied without confusion.

In the last sentence, reword to “also record b&w (black and white) or sepia, as applicable”, to clarify that both colour and black & white content may be present.

3.6.8.1. This definition is unhelpful. All substances are physical and chemical. Air is “used to create images” using an airbrush, but we don’t consider it a medium in that context. Change the definition to “the substance applied to the physical medium to create text, images, etc.”

3.6.9.1. The use of the term “storage medium” in this definition is confusing, especially with “Medium” being the previous data element. Physical material is the substance of which a resource is made.

3.6.9.3. The phrase “support or base” is not helpful to general cataloguers. The introduction of “manifestation” seems out of place as it is used so seldom in RDA. As we noted elsewhere, what is typical is open to wide interpretations; if we want consistency, we need to specify, and this does not seem necessary in this case. We suggest “Record the material of which the resource is made, if considered to be significant.”

3.6.10.1. As written, the definition would seem to apply to the bindings of books. Surely this is not intended.

3.6.12. This guideline should address explicitly whether these instructions do apply to digitally encoded audio resources.

3.6.12.4, 1st bullet. ALA is considering a recommendation to handle file types as part of the extent statement (see *5JSC/*).

3.6.13.8 e)

“Physical details” should probably be “technical details”; was this simply an editorial error?

We would also like to note that regional encoding is a highly significant characteristic for videorecordings, and an appropriate guideline would be a welcome addition to RDA. If the JSC is interested, ALA would be willing to make a proposal.

3.7.0.2. ALA is proposing some changes to the treatment of accompanying material with regard to sources of information in 2.2.1. However this is resolved, it is imperative that the sources of information for accompanying material include the accompanying material.

3.7.0.4. We prefer to refer to “Accompanying material intended to be issued successively” as many examples of accompanying material are issued quite irregularly. On the other hand, it is not clear that 3.7.0.4 adds anything to 3.7.0.3 other than confirming that 3.7 is applicable no matter how the accompanying material is issued.

3.7.0.5. The wording is confusing; use the AACR2 wording (2.5E2): “location within the resource.”

3.7.0.6 and 3.7.1.5. It is not at all clear how to apply the concept of accompanying material to remote access digital resources. This should be addressed either here or in 3.7.0.1.

3.7.1.3. We would like to see an explicit guideline to make a note on equipment and system requirements of accompanying material, with a reference to 3.9.

3.7.1.3, 3rd bullet. “Illustrative matter” should be “accompanying material”; was this simply an editorial error?

3.9.0.4. ALA is considering a recommendation for a much more general wording of this guideline (see *5JSC/ALA/2*).

3.11.0.3. The caption does not follow the pattern for other elements. It should read “Describing other formats.”

Chapter 4. Content Description

General Comments on Chapter 4

ALA is concerned that the terminology used for the title of this section, “Content Description”, may be easily confused with the subject content of the work, particularly when RDA is used by people outside the library community. We are also concerned that “content” in this section seems to have a different meaning here from the meaning it had

in the discussions leading up to RDA, in which content referred to expression and work, as opposed to carrier, the latter standing in for manifestation. Here content seems to refer to what the work is ABOUT. The purpose and scope wording should be amplified to state clearly that these characteristics are distinct from the subject content of the work (which we would like to see covered briefly elsewhere in RDA, as mentioned in our general comments on the draft as a whole).

The text in this chapter muddies the water between notes and other data elements. Again, as we discussed in our general comments, ALA would like to see the concept of “notes” more clearly defined, so that many data elements that were formerly described as “notes” become distinct data elements in their own right, unless they simply provide additional description of another data element. There are many cases within Chapter 4 where the guidelines instruct to “make a note on”. We suggest that many of these could be changed to more appropriate wording, such as “record “. We recommend that the JSC have a thorough discussion of what elements in this chapter (and others) should remain as descriptive notes and which ones should not.

Since 1.4 only lists two chapter 4 elements as mandatory, it is unclear why some of the rest are explicitly labeled as options (such as *system of arrangement*), while most are not. We recommend not including statements about a few data elements being optional in such cases, unless every element that is not listed under 1.4 as “mandatory” is also labeled as “optional” within the text of the guidelines themselves.

Comments on Specific Guidelines in Chapter 4

4.0. Purpose and scope. The quotation marks around “intellectual” may be seen as inadvertently condescending to users. Since there seems to be a desire to convey something specific by the use of these quotation marks, we recommend that the guideline be reworded to more accurately convey what is intended without using them. Perhaps using the FRBR terms *work* and *expression* would be helpful here?

4.3.0.3. Describing the nature and scope of the content. The music examples (“Principally in choirbook format.” and “Parts in score format.”) seem more appropriate to 4.11, Format of notated music. However, that section currently includes no instructions about recording this information.

4.3.0.3 1st bullet. To avoid using the term “note”, reword to “Describe the nature and/or scope of the content of the resource ...”

4.4.0.1

For “script”, we suggest, “Script is the characters in which ...” to avoid improperly implying that scripts are only alphabetic.

For “symbol system”, we suggest, “Symbol system is the non-alphanumeric system in which the content of a resource is conveyed”.

4.5.0.3. Describing the intended audience. Does this also include film ratings? We would like to see them explicitly covered somewhere as a data element. Is this what is intended here?

4.6.0.3. Summarizing the content. There is a fine line between Nature and scope (4.3) and Summarization of content (4.6) that needs to be clarified, although we realize that the present examples may be confusing the issue. It is also unhelpful to use the phrase “unless ... provides enough information” without saying enough of what? or for what?, or in order to what?

4.6.0.3, 2nd bullet: “Provide a summary for all resources designed for use by persons with disabilities.”

ALA is very concerned that this new guideline, while well-meaning, may not be the best way to serve that community and probably cannot be implemented in its current form.

How does one summarize a tactile map? The fact that it is tactile will already be in the record and the geographic area covered will also be in the record. How is it possible to reliably identify “resources designed for use by persons with disabilities”? Commercial audio books are not designed to be used by persons with disabilities, but they are used by the visually impaired. While many DVDs provide captioning for the hearing impaired, we are already in the habit of providing summaries for these resources.

An alternative to the current guideline would be to instruct elsewhere in RDA to indicate aspects of a resource that are intended for use by persons with disabilities.

4.7.0.3 2nd bullet. While this is a carry-over from AACR2, we are unclear of the meaning of the phrase “the state of the resource”. We recommend the first sentence be reworded to “...a resource comprising two or more parts, etc., of a serial or multi-part monograph, record the state of completeness of the resource at the time of description ...”. Also, we recommend changing the last sentence to “Update the statement as needed”.

4.8. System of arrangement. We would find it helpful if this guideline clarified its relationship to archival materials. “Arrangement” means something entirely different to music cataloguers.

4.9 Indexes and finding aids. The intended difference between this section and 4.10.1.7 is unclear; we are assuming that this element applies to all materials and not just to archival resources. We suggest broadening the scope of this element to something like *assistance resources* to include glossaries, user manuals, etc.

4.9.0.1

Index: we suggest changing “a file, document, or group of documents” to “one or more resources”.

Finding aid: The current definition is unclear. Suggested revision:

- A **finding aid** is ~~a representation of, or a means of access to,~~ a descriptive tool that provides access to a resource; ~~it is made or received by a repository in the~~ course of establishing administrative or intellectual control over the resource.

4.9.1. Cumulative indexes to serials. Cumulative indexes are not limited to serials; they also exist for multipart and integrating resources. ALA recommends removing “to serials” from the caption and “to a serial” from the first sentence of the instruction. The guideline also could be merged into 4.9.0.3.

4.10. Related content. Without seeing all of RDA, we cannot evaluate whether this entire section might be better placed within part 2. The heading “Related Content” does not completely identify the contents of the guideline, since it also currently includes bibliographic history, and is not necessarily related to the content of a resource. We recommend calling this guideline “Bibliographic History and Relationships with other Resources” (as in AACR2 12.7B8).

4.10.1.1-4.10.1.8. The current instructions lack the provision to make note of additional physical forms available as AACR2 currently contains. This needs to be added as long as manifestation-level cataloguing remains the default, and the ‘form of carrier’ attribute is listed as a mandatory element of each description (see 1.4).

4.10.1.1. Continuation, sequel, prequel, etc. How does this relate to 2.3.5?

4.10.1.4. Absorption. In the second bullet, there should also be the option to add the date of absorption (as in the first bullet). It might be useful in the same way that the date in a “Continued by” situation could be useful, e.g., if significant time has passed between the cessation of the title being described and the time the other title absorbed it.

4.10.1.5. Translations, 1st bullet. We recommend changing “previously published” to “previous”.

4/10.1.5, 2nd bullet. It is unclear what this is supposed to be saying.

4.10.1.6. Simultaneous edition [new proposal]. ALA suggests that this might be an appropriate place to add instructions for dealing with replacement volumes. Add a bullet as follows:

- If a multipart resource is published in two or more editions simultaneously and the editions are meant to constitute a single resource, make notes about the parts published as earlier editions.

Edition statement of v. 1-5, 7-8: 1st ed.
(*volume 6 has been replaced by a 2nd ed. volume*)

Includes various editions of some volumes

4.10.1.8. Issued with. The current wording is extremely broad. Many resources are issued with other resources in some fashion or another: as a “free gift”, from marketing/PR reasons, etc. Could this be clarified in some way? There also needs to be a provision for cases where there are numerous items issued together, such as a reel of microfilm containing many pamphlets or monographs. We suggest citing the first item and then adding a phrase added such as: “and several other works.”

4.11. Format of notated music. Definition: We recommend a reference from this to 2.5.1.4., Terms indicating edition, to assist cataloguers in making the distinction in treatment between these two guidelines.

4.12.0.3. Recording medium of performance, 1st bullet. For describing music materials, there is an intellectual disconnect between this guideline and **4.10.0.3, Describing related content.** Currently it appears that a note such as “Originally for violin and orchestra” would belong in 4.10.0.3, while a statement such as “Arranged for violin and piano” belongs in 4.12.0.3. Should this latter guideline be expanded to include notes about previous instrumentation, or is the existing separation along with the instruction in 1.7.6. about the ability to combine notes sufficient (which should allow for the creation of a note like “Originally for violin and orchestra; accompaniment arranged for piano”)?

4.13–4.17, General comments

- a. Scale, projection, coordinates, and other mathematical details: This set of information in AACR2 (all editions) is a mixture of **transcription** – and therefore use of brackets when information is not transcribed (e.g., if text on map states, “One inch to one mile,” then scale is given as “[1:63,360]”) – and non-transcription (e.g., “Scale” is always given without brackets, even when the word “Scale” does not appear on the resource; coordinates are in parentheses, whether they appear on the corners of the resource or not; “projection” is always abbreviated to “proj.” and never bracketed; etc.).
- b. Sources of information: If the “resource itself” continues to exclude the container and accompanying material, there will be contradictions within the code (e.g., 4.13.02 contradicts 4.13.03; 4.14.02 contradicts 4.13.03; etc.). If our recommendation to revise the footnote at 2.2.1 is accepted, this will not be a problem.

4.13. Scale of cartographic content. There are several different types of scale: horizontal, vertical, and angular. All three should be mentioned. It would be best to include overall instructions and examples, plus instructions and examples for all types of scale in this one guideline, rather than to scatter instructions for the three types throughout 4.13 (i.e., 4.13.0.3, 4.13.4, and 4.13.5). If this section is only for horizontal scale, then the caption of 4.13.03 should be, “Recording horizontal scale.”

4.13.2. Variations in scale. This is mixing up two completely different situations: scale varies within one map, etc.; and multiple scales of the main maps in one resource. The caption should be, “Variations in scale; multiple scale”.

4.14.3. “Proj.” is another example of an unhelpful abbreviation; users don’t know what “proj.” means.

4.15.0.1. This is not an accurate definition of coordinates; for example, this definition specifies degrees, minutes, and seconds, and neither of the latter two are required for coordinates given in decimal degrees. Suggestion definition: Coordinates are used to identify location of a given cartographic resource by means of latitude and longitude for planets and by right ascension and declination for celestial charts.”

4.15.0.2. Sources of information. This statement represents an unwelcome departure from past practice. ALA recommends that coordinates continue to be taken from any information source, not just from the resource itself. For example, when coordinates do not appear on a resource, a cataloguer may use another map, a gazetteer, etc., in order to determine those coordinates.

4.15.0.3–4.15.0.4. The AACR2 rule has been split into two guidelines, but the final paragraph of the AACR2 rule has been included with the wrong RDA rule. The option at the end of 4.15.0.4 should be moved to 4.15.0.3; this option pertains not to a string of coordinates but rather to coordinates based on a meridian other than Greenwich, with the coordinates having been converted to coordinates based on Greenwich.

4.13. Magnitude of cartographic content. ALA recommends deleting this guideline. There is no reason to put in this new guideline that is seldom needed. If other JSC constituencies perceive this section should be included, fold it into 4.17.

4.17.0.1. Definition

Either “mathematical data” should be used throughout the cartographic-resources portion of this chapter (and elsewhere in RDA as appropriate), or it should not be used at all.

“Record a statement of ...” is occasionally used (e.g., 4.13.4, 4.14.03, 4.15.0.5), but generally not in the previous guidelines for cartographic content, either in caption or in definition. It is preferable that this phrasing be used either consistently or not at all.

4.17.0.3. Noting other mathematical data. Change caption to “Notes on scale, projection, and coordinates.”

4.17.0.3, 2nd bullet. Detailed notes on horizontal coordinate system, datums, etc., are most often used with electronic cartographic resources. Although it is possible to have this information on a hardcopy cartographic resource, it is relatively unusual. Possibly this bullet might be better placed in 3.9.

4.18 Dissertations

ALA recommends that this section be broadened to include other resources that fulfill educational requirements, and that each piece of information (e.g. fact that the resource is a thesis, degree, institution, year) be treated as a separate element, as in Chapter 2.

We also recommend deleting the instruction on punctuation, which is a presentation issue.

4.19.0.1. Award. Definition: ALA notes that an award is not always for “excellence” although those types of awards might be all that are recorded in a bibliographic record by a cataloguer.

Chapter 5. Information on Terms of Availability, etc.

Comments on Specific Guidelines in Chapter 5

5.2.0.1. ALA suggests rewording the definition to

- **Terms of availability** are the ~~terms~~ conditions under which the publisher, distributor, etc., will normally ~~make~~ supply the resource ~~available~~ or the price for which the resource sells.

5.3.0.1. In the second and third bullets, change the introductory phrases to “For generally available resources” and “For unique resources”. Consider expanding the first sentence of this definition to read something like:

- **Contact information** is specific information relating to detailing where to get in touch with the organization(s), etc., from which the resource may be obtained.

Chapter 6. Item-Specific Information

Comments on Specific Guidelines in Chapter 6

6.2. Details of the item being described. All the data elements in this chapter (not just under 6.2) are “details of the item being described”, so we suggest changing that phrase. This section could be moved to the end of the chapter and labeled “other information about the item”.

6.2.0.3. In the third bullet, we suggest changing “after receipt” to “after issuance”. Many libraries have resources bound, etc., before they actually receive them.

6.3. Provenance. This guideline addresses custodial history (called here “provenance”), which can be used by anyone to record former owners, such as of rare books, and immediate source of acquisition, available only for archival use. The examples, admittedly not yet revised, also muddy the water. Provenance of course has different

meanings in the book and archival communities. For that reason should the section be renamed “custodial history and immediate source of acquisition?”

6.3.0.3. The term “original resource” is not especially clear here. It assumedly would be intended to mean “unique resource” (as opposed to original vs. reproduction). Or does it imply “manuscript”? We note that the term “provenance” as evidence of former ownership, is used in the rare book community, while its meaning is different in the archival community. While AACR2 limits provenance to manuscripts, we would like to be able to record this information for rare or costly items even if published, as well as for collections.

6.4. Restrictions on access. This data element can also apply to works, expressions, and manifestations. We suggest either moving this section to, or duplicating it in, Chapter 5.

6.4.0.1. The definition of restrictions on access refers to “physical access” but shouldn’t this apply also to access to electronic resources? We recommend the removal of the word ‘physical’ from the definition.

6.5.0.3. Recording restrictions on use. We don’t understand the point of the separate bullet on literary rights, especially as literary rights are represented in the examples under the first bullet. Is the distinction between literary rights and other forms of restrictions on use, or is it between the instruction to note restrictions “as specifically as possible” and giving boilerplate notes “Information on literary rights available” “if a document stating this is available”? Or is this simply a remnant of the restructuring of AACR2 rules?

6.6. Appraisal and accrual. ALA would like to see this section broadened so that it could be applied to all types of resources.

Appendix D. Presentation of Descriptive Data

Comments on Specific Guidelines in Appendix D

D.1 ISBD Presentation

ALA notes that some presentation elements that appeared in AACR2 are not specified in the ISBDs per se. Nevertheless, we would prefer the guidance from AACR2 on these issues remain in RDA in the Appendix, but perhaps designated in a different way from the “actual” ISBD presentation display so that it is possible for a catalogue user to tell which is which. We would also like to see some examples within RDA that use this AACR2-specified punctuation, especially in Chapter 3.

ALA recommends aligning the spacing conventions for ISBD presentation in Appendix D with those actually set out in ISBD(G), ISBD(CR), etc., since these practices are already in general use.

D.1.1

ALA notes that the title of the ISBD(CR) is *International Standard Bibliographic Description for Serials and Other Continuing Resources* (not just “for Continuing Resources”). This should also be corrected under **D.1.2**.

ALA likes the table format in this guideline. We suggest, however, that there be guidance at the beginning of the chart to specify that the punctuation shown is intended to precede the element listed. This information is currently hidden in the spelled-out instructions that follow the chart.

The RDA element name in the table needs to correspond with the caption of the element in the text. For example, the table lists RDA element 4.11 as “Type of score” but the caption in the text is “Format of notated music”. All of the mathematical element names differ from the caption of the elements in the text.

5. Physical description area. We note several examples of punctuation that are not in the ISBDs, but nevertheless appear in AACR2, and we would like to see them in the Appendix:

5.1 Specific material designation and extent doesn’t mention parentheses for details of extent such as running time, file size, etc., and no preferred order of multiple elements.

5.2 Other physical details doesn’t say how to punctuation multiple elements, nor if there is a preferred order.

7. Note area. There is no preferred order of elements. AACR2 also currently contains guidance on captions for notes, which are now a presentation issue and should be included within Appendix D.

D.1.2. ALA recommends that the provision of 0.4.8 from the ISBD(G) regarding square brackets, the marks of omission, and parentheses, be added to the General Instructions under D.1.2. Within AACR2, such instructions seem to have been dispersed within the text.

0.4.8 Three punctuation symbols can be used in all or most areas:

- A. Square brackets ([]) are prescribed punctuation to enclose particular elements in area 1 (see 1.2) and area 4 (see 4.3) and are prescribed punctuation within an element in area 5 (see 5.1). Square brackets also enclose information found outside the prescribed sources of information (see 0.5) and interpolations in the description (see 0.6, 0.7.2, 0.10, 0.11).

When successive elements within the same area are obtained from outside the prescribed source, they are enclosed in a single pair of square brackets unless one element is the general material designation, which is always enclosed in its own pair of square brackets. When successive elements are in different areas, each element is enclosed in a separate pair of square brackets.

- B. Marks of omission, i.e., three points (...), indicate the omission of some part of an element (see 0.7.1, 0.7.2).
- C. Parentheses (()) are prescribed punctuation to enclose each series statement in area 6, to enclose certain elements in area 4, and to enclose information within particular elements in areas 5 and 8.

D.1.2.3. Material (or type of publication) specific area. In c) Numbering, second paragraph, we recommend that “date” be changed to “chronological designation” to be consistent with ISBD terminology.

D.1.2.6. Series area. We suggest adding the AACR2 practice from 1.6G3 (which is not stated, but shown in the example) to the list of AACR2 practices to be carried over into Appendix D:

- Enclose a chronological designation following a numeric and/or alphabetic designation in parentheses.

D.2 OPAC displays. While ALA as a whole accepts the JSC decision to not include guidelines for the “single record technique” within RDA, some members of ALA are extremely disappointed by this decision. As a way to accommodate the needs of this group and to acknowledge a practice that is common within the U.S., ALA suggests that this section of Appendix D include examples of OPAC displays that specifically illustrate the display of data according to the “single record technique”, where the description of an original resource is followed by an abbreviated description of the reproduction, in a combined display. If the JSC agrees to include such an example, ALA will be happy to provide one that can be incorporated into D.2.

Appendix A

Comments Received by ALA on the draft of Part 1 of RDA from the IEEE LOM liaison to CC:DA

General comments

The world of Learning, Education and Training, which the IEEE Learning Technology Standards Committee represents, is very much hoping and wanting to gain great benefit from the enormous experience and expertise of the ALA and library community. This is particularly true for the LTSC Learning Object Metadata (LOM) working group.

The need for assistance, with metadata in particular, arises from the focus LTSC has on developing standards to enable learning anytime, anywhere which is customized to match the context of the individual learner.

It is not clear that ALA has grasped the totality and pervasiveness of the “sea change” that is occurring at an exponential rate in the world of content. That being a true “paradigm shift” in the transformation from static to dynamic content that will be not only dynamic in terms of being assembled in a much more on-demand fashion, but also content that will be unique assemblies that are massively customized and ultimately personalized to be “just right” for the individual “consumer,” aka reader, listener, watcher, learner, teacher, etc.

This type of digital, dynamic on demand content is extremely new and demands holistic rethinking and redefining the notion of a “resource” and the corresponding changes required for the metadata to describe such resources. This new paradigm is dependant upon massively increased amounts of metadata, classifications and other domains of which librarians are historically the masters.

Therefore, the current work on the new RDA provides a prime opportunity to both formalize and increase this relationship and mutual benefits between ALA and IEEE LTSC. However, this is only true to the extent which there is a common vision of the future of learning resources. RDA works very well for the historic and often current models of content (and libraries) of “book-like” and typically “self describing” resources, but much less so with the new and evolving models of content.

Not only is the content itself changing dramatically, so too are the roles of the producers and consumers of both content and metadata. We are seeing the emergence of what futurists such as Alvin Toffler called “ProSumers” in his 1960’s book *Future Shock*. We will no longer be nicely divided up into being either a “producer” or a “consumer” (words that are somewhat dated but still meaningful) and instead we are all becoming

both of these. How will ALA and others deal with all the content and the metadata which is being created by “the rest of us”? Examples of such “mass contribution” include blogs, wikis, presentation slides, Email, digital photos, music metadata and more.

IEEE LTSC would therefore have the perspective that ALA is at a critical decision point with this new RDA. If the focus of ALA is on revising the historic models of content as typically large fixed resources such as books, journals, films, etc. and with similarly fixed metadata records such as the card catalogue, then there is not likely to be much synergy or benefit between ALA and LTSC. If however the focus is on addressing these newly emerging models of extremely modular and dynamic content, then the synergy and benefits are enormous.

Relative to this decision point, it should be noted that the RDA and CC:DA documents themselves, and the process of creating and publishing them, reflects the very change in “content” or resources that is referenced above. There appears to be considerable discussion amongst the RDA and CC:DA group members over how their own documents will be created, published and indexed such as questions about the decision to have the primary driver and model for these documents to be “digital” and “web based” format as opposed to “print based”. We would suggest that this is a very telling example of the current and rapidly changing models of content and the problems they present. ALA would do well to consider this as they decide upon what direction to take with RDA.

Concerns with RDA goal statements

One of the primary goals of RDA is to be “... a consistent, flexible and extensible framework ...” yet there is almost complete lack of addressing the stated goal of flexibility and extensibility of the framework, and especially by any other than the author and beyond the perspective of librarians and libraries. In particular that RDA seems to be based entirely on the perspective of librarians and libraries, yet the goals state that this is to be used by all communities. With literally no mention of extensibility in the RDA then either the goal statement needs to be changed or the document needs to address extensibility.

Given the other stated goal of “... description of all types of resources and all types of content.” RDA seems to be based on a very historical model of resources, essentially books and book-like fixed resources. Yet the fundamental change taking place is in the very paradigm or model of content itself. The growing majority of resources (content) is NOT fixed, but rather assembled, increasingly dynamically and more on-demand, with mass contributions of the content itself and mass customization of the content upon delivery in a consumable form.

There is also concern with the stated goal to “Be compatible with internationally established principles, models, and standards,” yet there appears to be very little reference to or examples of the use of other standards.

We would strongly encourage ALA to follow “standard ways of creating standards” such as RDA that are flexible and extensible so as to allow for the inevitable changes and evolution that will certainly continue and accelerate though the life span of this version of RDA. With the stated goal of covering all content and all communities, the importance of following such “standard approach to developing standards” is even more critical.

The use of abstract conceptual models is a particularly good way to do so. Along with the similar suggestions from DCMI, we specifically recommended that CC:DA create three abstract conceptual models for:

Abstraction 1: Resources (content)

Abstraction 2: Metadata

Abstraction 3: Services

It may also be of great interest to ALA that DCMI and IEEE LTSC have recently created a new joint working group to create a common abstract conceptual model for metadata. Participation and tracking by ALA of this new work would be welcomed and encouraged.

Extensibility: We note in *Functional Requirements for Bibliographic Records* (aka FRBR): “extensibility of expression” (p. 43) defined on p. 44. Extensibility reflects the expectation that the expression will have additional intellectual or artistic content added to it (e.g., an expression that is completed one part at a time, segment by segment, issue by issue, etc.). In the *Functional Requirements for Authority Records* (aka FRANAR) document, extensible or extensibility does not appear at all. If we now turn to the draft RDA, the word extensible or extensibility does not appear at all. Now, let’s also focus on the word “function.” This word is widely used in the background documents, indeed, appearing in the title of FRBR.

In the RDA we have on page 2, as the “Objectives and Principles” of the RDA draft: “Functional objectives and principles of resource description.” But the use of “function” is to function within the context of locating a resource (identifying) and providing it to the user. On page 5 of the RDA draft: “structure and style of the Draft are designed to function in a web-based environment” but again, function is directed, not at, say the function of a learning object in relationship to other learning objects, but, has been subjugated to the function of librarianship. Indeed, an object, to a librarian is something like a book, or, more generally an entity.

In that these issues involving non-standard entities will be extremely alien to many discussing this RDA, it seems to us that there are two roles we can play in your revisions: Above we have discussed the easier problem of metatagging resources. Our years of taxonomy building and relationships with others, such as the Dublin Core, is experience to be drawn on. We suggest that an RDA revision person join ltsc-lom@listserv.ieee.org. This list will be pleased to provide information in shaping the RDA. Our second role is to help extend the envelope. As Deirdre Kiorgaard, Chair, JSC, in the Strategy document asked for an “extensible framework” and we do not see that the current RDA addresses that, we have made various comments on “abstraction” and extensibility is one key

component to abstraction. Recall that FRBR document mentions “extensibility of expression.” And that term, in the FRBR, is in context of an author. It says that an author might “extend” work to include additional work. From an interest of knowledge unification, this is not a powerful concept. We understand how it comes about. Librarians deal with entities by various authors. So, to them, extensibility is something the author might do with their own work. But, from an object-oriented standpoint this is quite limiting. An object is extensibility because it can inherit new properties and methods. And, those new functions are independent of whoever authored them.

We believe that the idea of an entity to ALA without authorship (or multiple authorships via inheritance) is a queer beast. Indeed, part of your umbrella of assuring quality has to do with who knowing who authored the piece. We believe there is a lifetime of work ahead of us. For the ALA community this involves a gradual process in expanding the role of librarians and libraries in understanding that organizing resources is not about getting some “gross” entity, like a book, into a user’s hand, but, often rather, information “when needed, as needed,” and at a level of granularity that they may not have conceived of. And, while web search engines provide a frustrating, intermediate interface, we do believe that cataloguing and access of ever more granulated pieces raises the need for cataloguing that greatly exceeds what is necessary to access entities of less granularity.

Abstraction Level: We suggest that for the IEEE efforts (and recent efforts by MIT/CITS/EPIE, below) to be useful to the ALA efforts, we need to, at least question, where and how an RDA addresses: (1) extensibility; (2) function [where an object performs functions, i.e., have properties and methods]; and objects, where we wish to assign descriptors and catalogue these objects. Cataloguing must go to a level of fine granularity, beyond tagging larger entities created by an author as a whole, and to where objects become sub-divided from “as a whole” viewpoint. But sub-divided does not mean to tag, say, a sentence. We must make it possible for authors/creators to find objects, say, on the net, from which these authors/creators can convey substance to their audience by inter-connecting existing objects, or creating new objects, and where, instead of interconnecting words on a page, the author inter-connects objects such that, via other objects, they can communicate to the “reader.” These objects act in relation to other objects as, say, in Smalltalk, as described in the MIT/CITS/EPIE AACE paper:

<http://www.epie.org/object.doc>.

As is discussed in our AACE paper, hardly anyone agrees what, say, a “learning object” is. Further, a writer of history on the American Civil War would be mystified if a librarian gave the historian a GUI (interface) to, not letters, articles and books, but to some set of “history objects.” No doubt if handed a piece of lead found at Gettysburg, the historian would know this physical object, but, this is not an object with abstraction. It is, as we define it, an “elemental object.” The bullet is incapable of describing itself. But, a bullet abstraction object could not only describe itself, but, it could relate itself to the bore of a rifle, could show its trajectory from the rifle, and could tell how many casualties bullets of its make and era caused. Such a bullet object could message a bullet casualty object, and that object could relate any number of known stories about the

hardship caused by such a bullet, including, say, diary entries by a soldier. A child, instead of writing a “term paper,” could work with knowledge objects, and by “asking them” to “play their parts” in telling a story, the child becomes, not only the orchestrator of these objects, but, has, via “inheritance,” added to the supply of such objects, i.e., the emotions, the events, the details that the child has interwoven is not only presented to his/her teacher, but becomes yet another object.

We ask for the formation of a CC:DA Task Force to Investigate and Coordinate Worldwide Efforts to Produce a Learning/Knowledge Objects that possess the properties of extensibility, and all other properties of a “well behaved” object as described in the 2004 review “A Condensation and Review of Various ‘Learning Object’ Activities and Efforts.”

[Note: This submission comprises the joint comments of Mr. Wayne Hodgins and myself. We repeat some material presented at San Antonio, and we add details based on our study of your materials.]

Sincerely,

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Appendix B

High-Level Data Elements in the draft of Part 1 of RDA

In developing our recommendation regarding hierarchical relationships between data elements in RDA (general comment **2d** above), the current draft of Part 1 was analyzed to see what high-level elements were already present, although perhaps not identified as such.

2.3. Title

Might be considered a high-level data element

Would need to change 2.3.0 from “Basic instructions on recording titles” to “Title”

Has a transcription rule (2.3.0.3) which could contain an instruction as to order of elements, sequencing of repeated elements

Issue: statement of responsibility is not a part of this “element” and therefore relations between a particular title and a particular statements of responsibility would not be covered by a high-level element defined at 2.3

The subordinate data elements would need to be identified explicitly.

2.4. Statement of responsibility

Has no subordinate elements, but is intellectually related to Title, i.e., for works without a collective title, a particular instance of title is related to a particular instance of statement of responsibility

2.5. Edition

Might be considered a high-level data element

Would need to change 2.5.0 from “Basic instructions on recording edition information” to “Edition information”

Has transcription rule (2.5.0.3) that could contain an instruction as to order of elements and sequencing of repeated elements (if there are any)

The subordinate data elements would need to be identified explicitly.

2.6. Numbering

Might be considered a high-level data element; has subordinate elements:

Numeric and/or alphabetic designation

Chronological designation

Would need to change 2.6.0 from “Basic instructions on recording numbering” to “Numbering [statement?]”

Has a transcription rule that could include instructions on order of elements and sequencing of repeated elements

Problem with current structure: individual data elements (2.6.1 and 2.6.2) are numbered in the same sequence as miscellaneous instructions (2.6.3-2.6.7)

2.7. Publisher, distributor, etc.

Has no subordinate elements

Is part of a [missing] high-level element: Publication, distribution, etc. [information?]

2.8. Place of publication, distribution, etc.

Has no subordinate elements

Is part of a [missing] high-level element: Publication, distribution, etc. [information?]

2.9. Date of publication, distribution, etc.

Has no subordinate elements

Is part of a [missing] high-level element: Publication, distribution, etc. [information?]

2.10. Series

- Might be considered a high-level element
- Has subordinate elements:
 - Title proper of series
 - Parallel title of series
 - Other title information of series
 - Statement of responsibility relating to series
 - ISSN of series
 - Numbering within series
 - Subseries
- Would need to change 2.10.0 from “Basic instructions on recording series information” to “Series information” or “Series statement”
- Has a transcription rule (2.10.0.3) that could include instructions on order of elements and sequencing of repeated elements
- Subseries in fact has subordinate elements:
 - Title proper of subseries
 - Numeric and/or alphabetic designation of subseries
 - Parallel title of subseries
 - Other title information of subseries
 - Statement of responsibility relating to subseries
 - ISSN of subseries
 - Numbering within subseries
- Issue: In 2.10.7 (subseries) the individual elements listed above are not separately defined and numbered (2.10.7.3, 2.10-7.7-10; and the instructions defining elements are mixed with other miscellaneous instructions (2.10.7.1-2, 2.10.7.4-6)

3.4-3.7. Extent, dimensions, other technical details, accompanying material

- Are these elements repeatable? If so, then instances of each of these elements are related to each other and need a high-level element (technical description?) which might be defined at 3.1.

4.13-4.15. Scale, projection, coordinates of cartographic content

- Are these elements repeatable? If so, then instances of each of these elements are related to each other and need a high-level element.