To: ALA/ALCTS/CCS Committee on Cataloging: Description and Access

From: Mary Lacy, Society of American Archivists liaison

Subject: Comments on 5JSC/LC/3/CILIP response

While we do not understand or agree with some of the specific criticisms, the overall "point" that the CILIP comments make is one with which we agree: that RDA needs to point to DA:CS, ISAD-G, RAD, and other archival descriptive guidelines used by communities in RDA's targeted audience because it is impossible to write an acceptable list of rules for "non-specialist" cataloging of archival materials; that the idea of a unified cataloging code is not sufficient to the current information environment in which librarians, archivists, museum curators, and others are working--which is why we recommended option a in our document, just pointing out to DA:CS et al., and leaving it at that.

We agree that there is a disconnect between embedding archival principles into RDA for the use of the generalist cataloger, and introducing principles of arrangement and description. Is there too much information (confusing to those without an archival background) or not enough (providing enough context already found in DACS and other archival standards?

We agree that the implication of the document is that RDA would only provide for archival control of manuscript resources (outside of medieval and renaissance manuscripts). I tend to agree that this is the correct response. If such resources are to be under bibliographic, not archival control, they might follow the basic rules given for providing title, date, etc., without need for the obsolete Chapter 4 rules.

Geographically speaking: CILIP is absolutely right that ISAD(G) should be recognized in any set of archival rules. And there are discrepancies among the national standards and practices – see the history of CUSTARD for irreconcilable differences between US and Canadian archivists.

Introductory remarks

We agree with the need for stating minimum level of description – RDA is in itself currently addressing questions of how to structure the rules to accommodate lesser and greater amounts of detail required according to the level of description. See SAA recommendation for a new section 11.2.3, "Elements of Description."

RDA 11.2.2

Non-repetition of information: this coincides with DACS principle 7.3, "Information provided at each level of description must be appropriate to that level." This seems to be implied in the description of "multilevel description" but perhaps should be stated more explicitly.

RDA 12.9

Rather than removing MARC coding of the example, SAA recommends adding an EAD-encoded example. Neither of these alternatives will probably be accepted within the RDA

framework (except perhaps in an appendix). DACS cites ISO 3166-1, which EAD requires but MARC21 does not yet adapt; there is a separate MARC Code List for Countries.

RDA 13.6 and 15.1

We agree that there are problems associated with conflating information about availability and existence of copies inherent in DACS approach. This makes it harder to map to the RDA outline, where RDA 13.6 is "Alternative format", part of the "Technical Description" chapter, where 15.1 is "Terms of availability" within the "Information on terms of availability, etc." chapter. SAA recommends adding a new rule for conditions governing access.

RDA 14.2

We agree that "Scope and content" is preferable to "Nature, scope, etc." which is the current proposed heading in RDA as well as in AACR2. SAA recommends as well.

RDA 15.1

ISAD(G)'s failure to require information about name and location of repository is a problem inherent in ISAD(G).

RDA 16.2

We agree that "provenance" is inappropriate here – this the term used in the RDA outline, and I don't see why "immediate source of acquisition" would be inappropriate for non-archival resources as well.

Part III

We agree that discursive style is not preferred, but unable to see what exactly should be offered for inclusion in Part III based only on the RDA outline. The key concepts of which RDA should be aware include the richness of archival authority records beyond the normal scope of the LCNAF.

Finding aids element

We believe that LC/3 is advocating a new note element here. Either this approach or including in "index" would be acceptable.

Crosswalk

ISAD-G elements can easily be added to a crosswalk if this moves forward.