To: Joint Steering Committee for Development of RDA

From: Kathy Glennan, ALA Representative to the JSC

Subject: Qualifications after an identifier – Amendments to RDA 2.15.1.7

ALA thanks ACOC for further exploring the issues surrounding qualifiers for identifiers. We do not agree that simply adding the proposed examples provides sufficient clarity to catalogers attempting to interpret the instructions.

Specific comments follow:

1. Because the identifier element is recorded, not transcribed (RDA 2.15.1.4), we do not believe that RDA gives specific guidance about when abbreviations are appropriate for this element. Although B.5.11 discourages abbreviations in other elements, the use of the term "generally" allows for a flexible interpretation about the ability to abbreviate in other elements. If a uniform result is desired, then there needs to be a proposal to add specific instructions.

2. We believe that consideration should be given to divide this element into subelements, to make the data more machine-actionable. We see the potential for three distinct data elements: identifier scheme/agency, identifier, qualifier.

3. While we welcome the concept of adding ISBN-13 and e-ISBN examples, we are concerned that the new example, which groups three ISBNs together, implies that all three apply to a single resource. It seems likely, however, that each of these is a distinct manifestation according to RDA, so the identifiers would not be recorded together as presented.