TO:	Joint Steering Committee
FROM:	Jennifer Bowen, ALA representative
SUBJECT:	Editor's follow-up to constituency responses on focus of the description and sources of information
Related	l documents:
5JSC/LC/1/Rev	

In general, ALA supports the approach as described in the LC response to *5JSC/AACR3/1/Editor follow-up/1*, with some exceptions. This response includes comments on both the original document and on the LC response. We start by addressing the numbered points in the LC response (which include the Editor's questions in the original document). Following this section, we have included additional comments on both documents, organized by rule number.

Responses to Numbered Issues in the LC Response:

5JSC/Editor/Part I/Editor follow-up/1/LC response

1. Regarding the adequacy and clarity of the guidelines for "setting up the description" under 1.2:

ALA prefers the LC approach to organizing this section, and prefers the chart format as in 1.2.3 to the list of examples used by the Editor under 1.2.1. We'd also like to see definitions of the categories included in rules 1.2.1 and 1.2.2. [additional comments below]

2. Regarding the feasibility of simplifying and "homogenizing" the specifications for preferred and alternative sources set out in the table and footnotes under 2.0.2.2:

In general ALA supports the LC approach, but we have some concerns about the adequacy of the simplification suggested by LC, as described below. The consequences of each of these simplifications need to be considered and some allowances made to ensure adequate compatibility with past practices. We appreciate the Editor's inclusion of all existing practices within the new framework so that we can begin this analysis process.

3. Regarding the placement of instructions on preferred sources of information (at 2.0.2.2 or under 2.1.1.2):

We agree with LC that the rules for sources of information should be given for each data element and that the sources for the title proper are the only ones that need to be given at great length. However, ALA members did not totally agree on the most appropriate placement of these rules within Chapter 2.

4. Regarding changes affecting current practices for bracketing information in the description:

ALA agrees with the LC statements and the LC principle regarding the use of brackets. However, we wonder if LC's proposed principle of not bracketing information if on the resource, even if not on the chief source, will make identification of the resource more difficult, and mean that catalogers won't always make distinctions among manifestations that now get separate cataloging records under AACR2. We question whether we really know whether or not such distinctions are important to catalog users. [see also below under 2.2.0.2]

5. Regarding the order of preference for sources of information for edition, numbering, publication, distribution, etc., information, and series statements:

In general we accept the Editor's recommendations, except that we prefer the LC approach for the series statement as it is more consistent with current practice and with the choice of title proper for successively-issued resources.

6. Missing component of the rules – use as access points:

ALA believes that this needs further discussion. Our assumption has been that the data elements would be recorded according to RDA guidelines (including provision for transcription when appropriate) and that the data elements could be used for access (indexed) if keyword access to the recorded form was sufficient. Is LC suggesting that information should be recorded differently based on whether it is intended to be a statement or a note, on the one hand, or as an access point? If so, we disagree. This is a matter of ISBD presentation, not of data recording.

7. Setting up the description, p. 2:

ALA agrees with LC.

8. Preferred sources of information, p. 2-3:

See comments above under #2. Rather than removing all of the detail at the outset, ALA would prefer to work through the detail to something simpler, recognizing that we are changing current practice in order to achieve this. We would prefer to start with something more like the Editor's table under 2.0.2.2 and work our way toward a more simplified approach.

9. Title proper, p. 3:

ALA agrees with LC's comments.

10. Parallel title and other title information, p. 4:

ALA agrees with LC on the first point, and has the following comments about the relationship between RDA and the ISBD that are pertinent to this section of the rules:

One of the design principles for RDA was that "instructions for recording data will be presented independently of guidelines for data presentation"; ISBD is to be treated (in an appendix) as a possible display specification for data recorded according to RDA guidelines. If that is true, then it seems inappropriate to limit the scope of RDA data elements in terms of ISBD display. The parallel title is a good example. The Parallel title is an ISBD element; the title proper in another language is a parallel title. This is a rather arbitrary and display-driven distinction. The logic of the RDA design is pointed towards defining a data element for Title proper in another language, and letting the ISBD display specifications govern whether that is displayed as a parallel title (following the title proper, preceded by =) or whether it is displayed as a variant title.

Furthermore, the distinction between what is included in a particular data element and what is a note could also be considered a matter of ISBD display, not of anything essential about the data as such. The logic of RDA seems to be to point towards removing such distinctions. On the other hand, does RDA need to record data in such a way that ISBD display specifications can be successfully applied? If we make no distinction between Parallel titles and Title proper in other languages, how can an ISBD display be created? It has to be based either on something in the recording standard or something in the encoding standard.

The question of the status of ISBD with regard to RDA is important for another reason. The Statement of Principles for an International Cataloguing Code states that descriptions should be based on ISBD. We can say that this doesn't mean the display specifications in ISBD (grouping of elements into areas, sequence of areas and elements, punctuation), but it would be hard to say that we are not obliged to follow the basic set of data elements and their scope definitions that are contained in ISBD. So, does this mean that we MUST define the data element as Parallel title and not Title proper in another language? Does it mean that we MUST exclude from RDA data elements those things that are ruled out of scope in ISBD and placed in notes? On the one hand, the logic of RDA is pushing towards the removal of some of these artificial distinctions and treating data in broad natural categories. On the other hand, the principle of compatibility with standards such as ISBD (to the extent that ISBD is a content standard and not simply a display standard) may be requiring that we preserve some of these artificial and arbitrary definitions. ALA suggests that this is an issue that must receive thorough discussion before the outline of Part I of RDA can really be implemented.

11. Statement of responsibility, p. 4:

ALA agrees with LC.

12. Edition, p. 5 and Place of publication, etc., p. 6:

ALA agrees with LC.

13. Series statement, p. 6:

ALA agrees with LC and prefers the LC version of 2.8.0.2.

14. Outline, Introduction to Part I, Relationship to other guides for resource description, p. 8:

ALA agrees with LC.

15. Outline, Chapter 2, 2.4. Numbering:

ALA agrees that rules on Mathematical Data and Musical Presentation belong under 2.4, but we would prefer to put Digital graphic representation in Chapter 3, Technical description. It is, in fact, a special case of a general data element – the file format – which is already mentioned in Area 5 rules in AACR2

16. Outline, Chapter 5. Sourcing Information, p. 9:

We prefer the LC outline.

17. Outline, Appendix X, p. 9:

ALA feels that this needs further discussion.

18. 1.2.1 and 1.2.2: We would prefer not to include these categories:

ALA agrees.

19. 1.2.3. Reflecting relationships between the whole and its parts, p. 13-14:

While we also found the Editor's text confusing, we may want to revisit the issue of including something in RDA dealing with whole-part relationships.

20. Sources of Information: Please see the 5JSC/LC/1/Rev. approach.

No ALA comment

21. Chapter 2 is missing the aspect of Access points (controlled and uncontrolled) under each element, as noted under 6 above.

See ALA's comments under #6 above.

22. 2.0.2.1. General guidelines, p. 17-18:

Agree with LC.

23. Tables, p. 19-21:

As stated above, in general ALA respondents favor a simpler table such as LC's, but we have some concerns that LC's approach is too simple. We'd like to see something in between the two (more detailed than LC's, but not as detailed as the Editor's)

24. 2.0.2.4. Other sources of information, p. 22-23:

Agree with LC.

25. 2.0.2.5. Information taken from sources outside the resource itself, p. 23:

Agree with LC.

26. 2.1. Title, p. 23:

No ALA comment.

27. 2.1.1.2. Sources of information, p. 24:

See our earlier concerns about simplification of current practice.

28. 2.1.6. Devised title, p. 25:

Agree with LC.

29. 2.2.0.2. Statement of responsibility, Sources of information, p. 25:

ALA suggests preferring "formal" statements rather than using the term "prominent" – this would still provide some guidelines for identifying appropriate statements.

There is an ISBD display issue here that needs further discussion. AACR2, in most cases, considers that statements of responsibility for performance should be given in a note rather than in the title and statement of responsibility area. If this is now to be considered a matter of ISBD display, does that mean that all such statements would be treated as statements of responsibility and that no distinction would be made (other than by the inclusion in the statement of the role of the contributor)?

30. 2.4.0.2 – 2.8.0.2. Sources of information, (in order of preference), p. 26-28:

No ALA comment.

31. 2.9.0. Basic instructions ... should be for "resource identifiers."

No ALA comment.

32. Overall style comments:

ALA agrees with both of the LC comments.

Other ALA comments (by Rule Number)

1.2. Setting up the Description

1.2.1. We prefer the phrase "Basis of the Description" used in the LC approach (or simply "Describing the Resource") rather than the phrase "Setting up the description". We would prefer not to use the term "discrete units of content" as in the *Editor follow-up* as it does not seem very user-friendly. [term not used in the LC response]

We found one aspect of this rule (and other rules) confusing in both the Editor's and LC's versions: When does a resource encompass accompanying textual material, the container, etc.? The LC version of 1.2.1 a) includes the phrase

"the resource itself (may have accompanying material)"

that unfortunately does not clarify this. Rule 1.2.4 c) of the LC version, which begins with the text:

"If the data elements are lacking in the resource"

seems to imply that all of the following subcategories (including a container and accompanying material) are "outside the resource", or at least does not distinguish which of the numbered categories that follow are outside the resource and which are part of it. On the other hand, LC's bulleted point #12 in the explanatory text to the LC response indicates the opposite of what is implied by the actual wording of the rules:

"Accompanying textual material, containers, etc, are considered a part of the resource \ldots "

ALA prefers that these other sources be considered a part of the resource so that current practices for not bracketing data from these sources can be continued. We suggest rewording 1.2.4 to make this explicitly clear.

ALA also notes the emphasis on "physical units" in the Editor's version of 1.2.1 seems to be a step backward at a time when we are attempting to emphasize the cataloging of digital materials. The LC version does not have this problem.

1.2.1. Footnote 1 [*LC response*]. We found the treatment of components (particularly in footnote 1) to be confusing. Once a cataloger decides what aspect of the resource to describe, there are choices available about what to do with parts of that whole. Some of these involve adding something to the description being created (notes, added access points) and some involve creating additional descriptions of the parts. However, the important thing is that the footnote is dealing with what to do with parts **after** a cataloger has decided what to describe, whereas 1.2.1 is dealing with making that decision. This needs to be much clearer.

1.2.2. Number of Records [*LC response*]. We'd prefer referring to descriptions rather than to records. This section deals with several different issues that might be better considered separately.

1.2.3. Basis of Description [*LC response*]. ALA prefers the LC approach at 1.2.3 rather than combining it with the "what you are describing" categories, as the Editor does at 2.0.2.1. We also prefer LC's tables to the Editor's narrative approach.

Under "Integrating Resources" (middle of p. 9 of LC response), 2nd paragraph:

Generally, consider a reproduction/facsimile of an integrating resource to be a monograph.

Suggest rewording to "Generally, consider a reproduction/facsimile of an integrating resource to be a single-part resource." The terminology "single-part resource" is used earlier in the section.

We also note in the Editor's text for 1.2.1 an emphasis upon "physical units" that does not seem to be appropriate for remotely-accessed digital materials.

1.2.4. Sources of Information for the data elements [*LC response*]. "Sources for selecting other data elements" – "selecting" is the wrong word here.

To remove any lingering ambiguity, we suggest stating even more explicitly: "Enclose information taken from any of these sources outside of the resource in square brackets."

References in c) to "area" are inappropriate; instead, list the specific data elements.

ALA questions the inclusion of statements about archival description such as the final parentheses – this needs further discussion.

2.0.2.1. Sources of Information/General Guidelines [*Editor's text*]. The wording "as appropriate" in this rule is too vague to be useful – we note that this phrase is not used in the equivalent LC rules at 1.2.4, which we prefer.

2.0.2.1 etc. [*Editor's text*]. The Editor's version of these rules are unclear as to whether or not accompanying material and containers are considered part of the resource itself, since container and accompanying material are included in the section under "Other sources of information" (2.0.2.4), which precedes the section on "Information taken from sources outside the resource itself" ((2.0.2.25), thus implying that they are a part of the actual resource. We note that the Editor's text retains current practice in the form of Footnotes 1-14 for 2.0.2.2, which accounts for much of the lack of clarity. Moving toward clearly considering accompanying material and containers to be part of the resource (as proposed by LC) will help to prevent an increase in the amount of bracketing in the rules after simplification.

2.1.0.2. Sources of Information [*LC response*]. This rule is so vague that we suggest perhaps deleting the first main bullet and letting the second main bullet serve as a set of references to specific elements.

2.1.1.2. Sources of information [LC response]

p. 15: "Single manuscripts" category. These sources are only appropriate for textual materials. Manuscript maps or manuscript music should be treated using the sources listed for "Other resources". We suggest deleting the separate category for "single manuscripts" and let "Resources comprising pages, leaves, etc." cover applicable manuscripts, with the others falling under "Other resources". As to specifics, "cover" is unlikely to apply to textual manuscripts, and "masthead" and "heading" seem to be talking about the same thing.

p. 15: "Other resources" category. ALA finds the LC text in this final category to be inadequate. Current practice distinguishes between those types of resources that often have internal textual labeling (such as videos and electronic resources) – for which we prefer the internal sources – to those that don't (such as sound recordings) – for which we prefer external labels. The issue of whether or not to preserve this distinction needs further discussion. Preserving it might mean dividing "Other resources" into two categories. If the distinction is preserved, however, there is some interest within ALA in allowing catalogers the option of preferring external labels and indicating the source of title in a note for those materials that do have internal sources.

There also needs to be some place where we state that, when the entire resource is the source of the title proper, then the specific source from which the title proper is taken **must** be specified in a note.

p. 15: "Title lacking." The order of the categories in this section is confusing, as is the jumping back and forth between the terms "title" and "collective title". We wonder if in some cases the word "title" implies or includes "collective titles" but not in others? The LC response lists the categories in this order:

- 1. Resource in 1 part, has titles for individual works, but no collective title anywhere [presumably not on resource itself nor on accompanying materials or container]
- 2. Same, but for resource in more than 1 part
- 3. Resource lacks a title [or titles?] **on** the resource itself, but has a collective title on something other than the resource itself (container, accompanying material but aren't these a part of the resource itself? If they are, then does a resource in this category really lack a title?)
- 4. No title anywhere (and presumably no collective title either, although this isn't stated ...)

It would be clearer if the options went in sequence from "some title somewhere" to "no title anywhere" rather than jumping back and forth. A more logical order might be 3, 1, 2, 4.

We also find the wording of the third option confusing, as it seems to cover two distinctly different situations:

- a resource that includes one work, that lacks a title on the resource itself but has a title (not a collective title) from somewhere not on the resource, and
- a resource that includes multiple works and titles for each, but no collective title on the resource itself (but available from somewhere not on the resource).

It would be clearer to explain these under separate bullets rather than combining them.

2.2.0.2. Statement of Responsibility/Sources of information [both documents].

According to both the Editor's text and the LC response, a statement of responsibility taken from a source other than the chief source that is a part of the resource itself would not be bracketed. This "mixing and matching of sources" that has been introduced into Chapter 9 of AACR2 is already causing some amount of confusion. As described above under LC bulleted point 4, we have some concerns that identification of the resource will be more difficult as a result.

2.4.0.2. Numbering/Sources of information [*LC response*]. ALA agrees that rules on Mathematical Data and Musical Presentation belong under 2.4, but would rather see Digital graphic representation in Chapter 3, Technical description. It is, in fact, a special case of a general data element – the file format – which is already mentioned in Area 5 rules in AACR2 (see response to LC bullet point 15 above)

2.5.0.2. Publication, Distribution, etc./Sources of information [*LC response*]. Does it need to be stated whenever there is reference to sources outside the resource, that such information needs to be bracketed. If so, does this also apply to notes?

General Conclusions

As a next step, ALA suggests that the Editor incorporate the LC proposals for reorganizing and streamlining these rules, taking into account our comments above. However, we would like to see 2.0.2.2 retained for now until the consequences of additional simplification and homogenization of these rules can be more thoroughly discussed. ALA will provide more detailed feedback to the JSC on this particular issue as ALA's discussions continue during the coming weeks.