To: Joint Steering Committee for Revision of AACR

From: Deirdre Kiorgaard, ACOC representative

Subject: Rule proposals for archival and manuscript resources

General comments on the proposal

ACOC welcomes LC's proposal as a starting point for discussion of updating and improving the rules for archival and manuscript resources. We note that both *Describing Archives: a Content Standard*, and any other national standards such as the Canadian *Rules for Archival Description (RAD)*, should be taken into account in this process. Currently our understanding is that *Describing Archives* and *AACR* are used within the library community in Australia.

We note and are strongly supportive of LC's comments regarding folding some of these rules into more generalized rules. Wherever it is both theoretically consistent and practical to do so, we would prefer that the RDA rules for manuscript collections and archives be incorporated with general rules for other collections. As part of this generalisation, references to "archivists" need to be removed.

Comments on specific rules in the proposal

RDA 11.2 Setting up the description RDA 11.2.1 Identifying Archival Resources

The suggested text offered here provides a disproportionate level of detail to that which will be provided for other resources.

The first paragraph provides useful information suitable for a Glossary definition, but should only be included at this point only if a similar level of detail is provided for other resources. "Family" should also be added to the first sentence.

The second paragraph up until "Two principles …" with its description of "arrangement" versus "description" is unnecessary. We agree that the principles of provenance and original order are important to an understanding of how archival collections may be treated differently from other collections, but consider that simply naming these principles, accompanied by a reference to DACS, is all that is needed.

RDA11.2.2 Number of records: Determining archival resource to be described

The information on single level versus multilevel descriptions could be adapted as needed for the general rules.

RDA 12.1 Title

In preference to giving a separate rule for archival titles, ACOC would prefer that the rule A1.1B11 in *5JSC/AACR3/I* be revised as necessary to incorporate any additional concepts which are generally applicable to supplied titles.

We would also welcome a proposal to additionally provide for the inclusion of date information in the supplied title.

RDA 12.7 Date of publication, distribution, etc.

Again the first paragraph is unnecessarily detailed, and it would be preferable to revise the rules on recoding dates for resources in an unpublished form to incorporate any additional concepts needed. The "date of record-keeping activity" seems inappropriately specific for inclusion under RDA's "Date of Publication". We would welcome the inclusion of provisions for Inclusive, Bulk and Single dates into the general rules for unpublished resources.

As noted above, we would also welcome a proposal to additionally provide for the inclusion of date information in the supplied title.

RDA 12.9 Resource identifier

ACOC would be interested in discussing how the specific concept of a resource identifier for archival resources relates to other unique numbers associated with a resource.

RDA 13.2 Extent

ACOC would appreciate a revision of the rules on extent for all types of collections that provides more flexibility in how these are recorded. The use of "material types" in this proposal would need to be revised to reflect changes to the SMDs.

RDA 13.3 Dimensions

ACOC would prefer that the general rule on recording dimensions be revised to incorporate any additional concepts needed.

RDA 13.6 Alternative formats

ACOC would prefer that the appropriate notes rules be revised to incorporate any additional concepts needed. ACOC notes the overlap between this rule and the proposed rule RDA 15.1 Terms of availability.

As noted in *5JSC/AACR3/I/ACOC response*, general guidance on when notes are included in the shareable part of the bibliographic description needs to be added to the rules.

RDA 14.2 Nature, scope, etc.

ACOC would prefer that the general rule on notes on Nature, scope etc. be revised to incorporate any additional concepts needed.

RDA 14.3 Language and script

ACOC would prefer that the general rule on notes on Language and script be revised to incorporate any additional concepts needed. We question the mention of codes for machine processing.

RDA 14.6 Contents

System of arrangement.

ACOC considers that the level of information given in LC's proposal should be optional. Libraries may wish to provide only general information within the catalogue record, with more detailed information in a finding aid.

RDA 14.7 Related content

Related materials

ACOC would welcome the addition of an optional rule for related materials. Again we note that general guidance will be needed on when notes are included in the shareable part of the bibliographic description.

RDA 14.10 Administrative/Biographical note.

ACOC notes that administrative and biographical information belongs more appropriately in the authority description not in the bibliographic description, although we recognise that many libraries have to date used MARC bibliographic field 545 to record this information. We would appreciate further discussion on the most appropriate place to record this information, and would like to see guidance on this matter added to RDA.

RDA 15.1 Terms of availability

Availability of archival originals, when not held by the repository

ACOC notes the overlap between this rule and the proposed rule RDA 13.6 Alternative formats.

Name and Location of Repository

ACOC questions the inclusion of this information as a "required" element. Generally the repository will be the library creating the bibliographic description, and this information properly belongs in the holdings record.

RDA 16.2 Provenance [and custodial history]

ACOC would support the optional use of these notes.

RDA 16.3 Restrictions on access and use

ACOC considers that the proposal is already covered by the rules in the Editor's draft.

RDA 16.4 Appraisal and accrual

ACOC notes that the proposal specifically mentions information "that has a bearing on the interpretation and use of the resource" and would support the inclusion of an appropriate rule in RDA.

Part II of RDA: RDA 22.1 Primary access point

ACOC would welcome the inclusion of a definition of the primary access point that encompasses the archival resources.

Part III of RDA: Access Point Control

Please refer to our comments under RDA 14.10 Administrative/Biographical note above.

Other elements for RDA Finding aids element

ACOC notes that *JSC/RDA/Prospectus* appears not to have a rule relating to Indexes and finding aids as per rule A1.7B22 of *5JSC/AACR3/I*. ACOC supports the continued inclusion of such a rule, noting that libraries may choose to supplement their catalogue record with a finding aid. The text in the LC proposal, suitably edited, is an improvement on that offered in A1.7B22 of *5JSC/AACR3/I*, however we note two omissions: the reference to indexes, and to the level of control.