TO: Joint Steering Committee for Revision of AACR

FROM: Sally Strutt, British Library representative

SUBJECT: Rule proposals for archival and manuscript resources

The British Library has sought comments from its manuscripts and archives cataloguing experts in reviewing *5JSC/LC/3*, and their specific comments are given below. We have also considered the *ALA response*. We think LC has done an excellent job of proposing rules which would be much more acceptable to the archival community than the current manuscripts rules in AACR2 which are considered inadequate. However, we note the general points made in the *ALA response* and agree with ALA that RDA should make explicit reference to international standards such as ISAD(G) as well as to the national standard of DACS; and that RDA should include guidelines for creating bibliographic descriptions of manuscripts and assembled collections, including appropriate archival **practices**, as opposed to **principles**.

Specific comments from BL manuscripts experts:

We note that the proposed rules are aimed at the general cataloguer. Notwithstanding the comments above, if the rules were to be presented as here, we think the general cataloguer would find them sufficient for their needs and easy to use – the explanatory text under each heading is particularly clear and concise for the non-specialist.

We would urge that cross-references within RDA and to other sources, make explicit the types of manuscript material for which special supplementary rules must be followed (usually because they require additional data elements) e.g. manuscript maps, photographs, seals, electronic documents.

We are not familiar with DACS in the BL. However, it is clear that the present proposals are based very closely on ISAD(G) which means they would be fully acceptable in the UK. They are compatible with the UK Interoperability Protocol (National Council on Archives, 2003), and contain all the elements identified there as mandatory for data exchange (apart from a minor query about physical characteristics at item level).

RDA 11.2.2

The non-specialist might be puzzled by the rather perfunctory reference to archival levels here. This is the one place where more explanation might be beneficial, particularly if the 'level' is to be applied correctly as part of the catalogue record.

RDA 12.1

It is good to see 'records', 'papers' and 'collection' defined. Other sets of rules have tended to skate over this crucial point.

It is very good indeed to have the use of square brackets for supplied titles expressly prohibited for archival materials. This was controversial in AMREMM.

RDA 12.7

Dates in the form: year-month-day are just too unfamiliar to be accepted this side of the Atlantic. The archival community must think carefully about how prescriptive it really needs to be. We would prefer the rule to state that the month must be in words not figures to avoid confusion, and to tolerate our differing practices with regard to the position of the day and year.

On a minor point, we are interested to note that the examples use 'approximately' in dates, but 'circa' in measurements (RDA 13.2). Internal manuscript cataloguing practice at the BL has always been the opposite i.e. to restrict 'circa' to dates.

RDA 12.9

If a country code is recommended, the relevant standard should be cited - ISO 3166 (geographic codes).

RDA 13.2

After foot run, which is the most important indicator of extent, we think that it is in the interests of clarity to encourage cataloguers to state the material type (e.g. volumes, letters) rather than just items. Confusion reigns at present because manuscript holdings in American libraries are counted in terms of single documents, whilst the British tend to count volumes (visitors cannot believe that the BL has 'only' about 300,000 manuscripts when their own libraries hold millions!).

RDA 13.3

Dimensions of containers are not generally included in existing rules but are an interesting addition and of possible relevance for storage planning.

RDA 15.1

We think that the availability of originals and copies should remain under RDA 13.6, and not be moved to this heading. 'Terms of availability' is generally understood to mean such things as statutory closure periods, donors' restrictions on issue, copyright etc. (which appear below under RDA 16.3). It does not immediately suggest surrogates.

RDA 16.2

Logically, Custodial history should come before Provenance, as in ISAD(G).

Other elements: Finding aids

Reference to Finding aids belongs more appropriately under Scope or Contents rather than being tagged on at the end. There seems to be no provision for bibliography (references to editions and publications based on the collection).

We find the order of data elements as listed here a little odd. Both BL practice and ISAD(G) put reference codes first, before the title (which is not regarded as an identifier). The administrative or biographical note should surely precede the scope and content elements, if the entry is to move logically from the general to the specific. In this way, information relating to all levels of the collection is contained at the highest level and does not need to be repeated. We find the structure of the entry proposed here less clear than in ISAD(G).

Ancient, Medieval and Renaissance Manuscripts (4.7B23)

We are glad to see AMREMM acknowledged as the guide for cataloguing early manuscripts. We would want to guard against rules for cataloguing archival collections appearing to be given greater prominence than those for cataloguing single codices (which as a result may simply be treated in the same way as rare books). In the UK, we try to keep handwritten documents of all kinds together.