To: Joint Steering Committee for Revision of AACR

From: Deirdre Kiorgaard, ACOC representative to JSC

Subject: RDA: Resource Description and Access. Sections 2-4, 9

Constituency review of December 2007 Draft.

ACOC offers the following comments on Sections 2-4, 9 of RDA.

***As requested in the cover letter, ACOC has indicated (using a triple asterisk) the issues which we consider essential to resolve in order to achieve the stated goals of RDA. Other issues which we consider high priority have been given a single asterisk.

ACOC has responded to cover letter questions in the body of our response as requested. They are marked by this bullet.

[Editorial]. ACOC has generally not commented on issues to do with display and layout, noting that these will be decided in the context of the online product. Minor comments on wording have been noted as "[Editorial]".

ACOC has taken the opportunity of responding of responding to many of the LC comments as these were available at the time this response was written. Comments on the responses of the other JSC constituencies will be provided at the meeting.

Discussion topics identified in LC response.

ACOC agrees there are issues related corporate bodies, and primary responsibility, and looks forward to discussing the discussion papers offered by LC.

General comments

***1. Covering multiple scenarios. ACOC notes that there are difficulties in writing RDA to cover both *Scenario 1: Relational / object-oriented database structure* and *Scenario 2: Linked bibliographic and authority records*. It is difficult both to write instructions and to structure them optimally when the context is not clear. Specific examples of this issue are noted below.

- **2.** Use of FRBR/FRAD in structure and titles. ACOC would like the high level structure of RDA to be more visible, i.e. the division between recording attributes and relationships. We question the usefulness of referring to the user tasks in the names of individual chapters, e.g. Identifying persons, and would prefer to use titles that referred to attributes or relationships, e.g. Attributes of persons.
- ***3. Relationship with FRBR/FRAD. ACOC notes that some attributes and relationships have been treated differently in FRAD than they were treated in FRBR. We request that the JSC continue to update the existing mappings ¹ and note any discrepancies between them. Reverse mappings would also be helpful in explaining

¹ 5JSC/RDA/RDA to FRBR mapping/Rev http://www.collectionscanada.gc.ca/jsc/docs/5rda-frbrmappingrev.pdf; 5JSC/RDA/RDA to FRAD mapping http://www.collectionscanada.gc.ca/jsc/docs/5rda-fradmapping.pdf

RDA to those familiar with FRBR/FRAD. It would be beneficial if they could be provided with the full draft for constituency review.

4. Need for a section overview. LC has suggested referring to other chapters in the scope notes for chapters 5 and 8. ACOC agrees that there may be a need for an overview of each section, and we would like to discuss where this could be placed.

Comments on consistency in wording

- **1.** ACOC suggests replacing the phrase "make additions to" with "add to" in instructions (where possible) so that the instructions are in active voice.
- **2.** ACOC suggests harmonising the following instructions: those that say 'identical or similar to" i.e. 6.1.1.0.3, 6.1.1.7.1, 6.17.1.11.1, 6.23.1.31.1, 6.23.1.33.1, and those that say "the same as or similar to" (or a variant of that) i.e. 5.3.2, 6.1.4.3.1, 6.17.4.3, 6.25.2.4.1, 8.3.2, 29.3.2, unless there is a reason for the difference.
- **3.** ACOC suggests using either "apply" or "follow" in instructions e.g. "Follow this instruction" or "Apply this instruction", but not both unless there is a reason for using the different formulations.
- **4.** ACOC has noticed that 'source of information' is used in some instructions (5.5.2.1, 5.5.3.1, 5.5.5.1, 8.5.2.1, 8.5.3.1, 8.5.5.2). Given that the instructions allow for the use of multiple sources, should the phrase be given as 'sources of information' (i.e. in the plural)?

We have also noticed that 'preferred source of information' has been retained in some specialised instructions (6.23.1.7.1, 6.23.1.21b.1, 6.23.1.23.2, 6.23.1.24.2, 6.31.0.4.4c, 11.2.1.1.3, 11.2.1.5e1, 11.2.1.5f.1), even though no preferred source is specified. (Chapter 6 allows multiple sources and chapters 9-11 use a preferred order of sources, but not a preferred source per se.)

Section 2: Recording attributes of work and expression

LC comment on extending section 2 to cover manifestations and items. ACOC would like a fuller explanation of what LC intends (given Section 1 covers manifestations and items, and Section 7 covers recording subject relationships). Is it related to a desire to see access points for manifestations and items covered?

Chapter 5: General guidelines on recording attributes of works and expressions

LC comment on adding references to other chapters at a new 5.0.4. See ACOC's general comment 4. Need for a section overview.

LC comment at 5.1.3.2. Although ACOC disagrees with LC regarding what the current definition says, we support their suggested re-wording.

LC comment at 5.2. ACOC prefers that the objectives and principles that are relevant to this section be given in this section. One of the goals of RDA is to show the relationship between the RDA principles and the specific data that is recorded.

LC comment at 5.2.1.a). ACOC would welcome the addition of some text to RDA that mentions that recording the attributes of all four FRBR Group 1 entities allows catalogues to be designed for improved navigation through collocation of related manifestations.

5.3 Required elements

***Relationship to Functional objectives and principles. Although there is an implicit assumption that the elements are required in order to meet the Functional objectives and principles, ACOC believes it would assist the cataloguer to have that explicitly acknowledged in this section. In particular the role of the preferred access points in achieving these objectives should be addressed.

Assigning the status of 'preferred' to one access point is essential in a database containing linked bibliographic and authority records (scenario 2). ACOC would like the JSC to discuss whether preferred access points are necessary in a relational database (scenario 1).

[Similar comments made at 8.3]

- ***"Required" label. ACOC would like the JSC to re-consider the impact of the decision made at the April 2007 (see Draft 5JSC/M/159.3) to use only the labels "Required" and "Optional". The instructions need to be clear about when a required element absolutely must be present in the description (i.e., the title proper), and when the element is required if present on the resource or can be readily ascertained. This could be achieved through providing more explicit labels, or more explicit instructions in the General Introduction, or in the introductory chapter to each section where the required elements are specified.
- ***Required for works or expressions? ACOC found it confusing to combine the instructions for required elements for works and expressions in one set of instructions. It is not clear from the draft whether, when recording the elements as part of the preferred access point, access points for both the work and the expression were required. This is an example of General comment 1. Covering multiple scenarios, noted above.
- **5.3.1-5.3.3.** [Editorial] ACOC would prefer to include the information given in footnotes 1-3 in the text of the relevant instruction 5.3.1-5.3.3.
- ***5.3.1 FRBR/FRAD. ACOC notes that both Title and Identifier were treated as attributes of the work in FRBR, but are no longer treated as such in FRAD. Instead they are treated as separate entities with relationships to the work (expression etc.) entity. ACOC would appreciate discussion of how RDA can deal with this difference.
- **5.3.1 Content type.** Content type is required for the expression level, and is correctly listed as required at 6.11. It should also be listed in 5.3.1, but has been included at 5.3.4 in this draft.
- ***5.3.1 Title. ACOC would like it to be clear that the preferred access point representing the work is required.

- ***5.3.1 Identifier. The JSC's decision that the identifier would be required if applicable (i.e. available, see Draft 5JSC/M191.3.7) is not properly reflected in the way the required elements have been presented in this instruction.
- ***5.3.2 ACOC notes that the instruction at 6.7 is applied only to distinguish between works with the same title, form, date, and place of origin, but this is not clear from the wording given in this instruction. [Comment repeated at 6.1.1.7]
- *5.3.4 The use of 'more fully' and 'as a minimum' is confusing. The attributes listed under 5.3.4 should be treated as required (or not) as applicable.
- **LC comment at 5.4.** ACOC notes that only 5.4.1 is limited to titles, and so does not agree that the heading should be changed.
- **LC comment at 5.4.1.** ACOC reads 'sources from which they are taken' to mean the sources specified in the chapter 6 instructions on recordings titles of works and so do not see a contradiction here. We would be happy to add wording that made this more explicit. We would prefer not to add a reference to 2.2 here. If the reference is added, should it be to 2.2.1-2.2.2, per 2.3.0.2.1 a)?
- **LC** comments at **5.4.2** alternative. ACOC supports the revised wording suggested by LC.
- **LC comment at 5.4.3 & 5.4.4.** ACOC agrees that the terminology used here should be consistent with that used to name chapters 6 and 7.
- **LC** comment at **5.5.0.1.** ACOC questions the validity of a 'take what you see' approach to titles for works as these are intentionally controlled.
- LC comment at 5.5.1b1. ACOC likes the LC re-wording, however the examples included in the deleted 'such as' statement could usefully appear as examples in parenthesis following that re-wording.
- **LC comment at 5.5.3.1** ACOC requests additional information about LC's suggestion.
- LC comment at 5.5.3.2 ACOC agrees with LC.
- **LC comment at 5.5.5.1** ACOC would be happy to see this case mentioned in the instructions at 6.3, and the Editor to provide references as needed.
- LC comment at 5.5.6.1. ACOC agrees with LC.
- ***5.6 Preferred access points representing works and expressions. ACOC found it confusing to combine the instructions for preferred access points for works and expressions in one set of instructions. Instructions at 5.6.1-5.6.4 are about constructing the preferred access point for the work. Instruction 5.6.5 explains how to build on the preferred access point for the work to create a preferred access point for the expression. However, it is not clear whether separate access points are needed for both. This problem is similar to that raised in our comments for 5.3.

- LC comment at 5.6.1 and 5.6.2. ACOC agrees with LC that this could be simplified, although we would prefer to see the word "if applicable" at the end of a) rather than the beginning. Note that 5.7.1-5.7.2 could use a similar formulation.
- **5.6 and 5.7.** ACOC notes that these two sections provide an overview of how chapter 6 is used in the construction of preferred and variant access points, and so may fit better within that chapter.
- ***5.7. Variant access points representing works and expressions. [Comment similar to LC's at 5.7 sub head]. ACOC notes that 5.7 lacks an instruction on creating a variant access point for the expression, similar to that in 5.6.5. If variants are only tracked at the level of the work, this should be made explicit.
- **LC** comment at 5.7. (1) ACOC would like the nature of this issue to be clarified by LC. (2) ACOC would assume that variant titles appearing on the manifestation would be given in the manifestation record (scenario 1) and the bibliographic record (scenario 2). ACOC would like to discuss LC's comment about Series authority records. ACOC would view these as authority records for the aggregate work.

LC comment at 5.7.3 ACOC agrees with LC.

> 5.8 Status of preferred access point – Values used

ACOC would appreciate terms which are more readily understood, and would welcome a discussion of the values to record. We agree with LC regarding adding an instruction to change the status as needed.

- **5.9** [Comment similar to LC's at **5.9.0.3.3**] ACOC would like to be able to indicate whether information was or was not found in the sources consulted. Should there be separate elements, or should the information be added to the examples?
- **LC** comment at **5.9.0.1.1.** ACOC agrees with LC, and use standard phrase to cover throughout RDA whenever these additional sources are included.
- **LC comment at 5.9.0.3.1.** (1) ACOC would like to discuss. (2) ACOC would like wording to be added to cover this.
- **5.10 Cataloguer's annotation.** [Comment similar to LC's at **5.11**] ACOC notes that the annotations are a mix of information of use only to the cataloguer (e.g. a) the instructions followed to create the access point) and information of use to other users of the catalogue. Presumably some of this second type of information would be covered elsewhere in the description? [Similar comments at 5.10, 8.13, and 29.7]

Chapter 6: Identifying works and expressions

Please also see our comment at 5.6 and 5.7 where we suggest moving the information given there to Ch 6.

LC's General comment ACOC would like to discuss as part of the general discussion on IME-ICC.

➤ Identifiers – advice on which identifiers for works and expressions should be required.

ACOC notes that international standard identifiers for works and expressions are in the early stages of development. Given this we don't think it is possible to require any specific identifiers at present. This should be re-considered after RDA's initial release. Please also see our comments on required elements at 5.3.

6.0.1.1. [Editorial] ACOC would prefer to include the information given in footnotes 1-2 in the text of this instruction.

6.0.1.2. [Editorial – note similar comments might apply at 9.0.1.2, 10.0.1.2 & 11.0.1.2] ACOC would prefer that the detail of how the preferred access point is constructed was left out of this instruction, e.g.

The chapter also provides guidelines on using the preferred title for a work in conjunction with other identifying attributes of the work and/or expression to constructing the preferred access point representing that the work or expression, and using variant titles to construct variant access points.

LC comment at 6.0.1.5 ACOC would like to discuss why this sentence has been given here.

LC comment at 6.0.2 Sources of information. ACOC would be happy to re-word to avoid duplication. However, we note that LC's revision of 6.0.2.1 does not mention sources which are the point of the instruction and reference, and so would need to be re-worded.

In the proposed 6.0.2.4 we question the appropriateness of giving a reference to the ca. 36 pages of instructions at 2.1-2.3, few of which will have any bearing on determining the source for the preferred title. If JSC decides that a reference is needed, we believe it should be given at 6.2.0.2 to limit it to sources used for the preferred title of the work, and be a reference to 2.2.1-2.2.2 only.

ACOC notes that there are two situations occurring here.

- For the majority of works which exist in only one expression and manifestation, the cataloguer will choose the preferred title using information from the preferred source for the manifestation. (With luck, their system will be smart enough to do this for them.)
- Where multiple expressions or manifestations exist, the cataloguer would not usually (and should not be required to) consult each manifestation to determine the preferred title. Instead they will consult descriptions of those manifestations. In these cases the phrase "from resources embodying the work" gives sufficient direction.

LC comment at 6.0.2.2. ACOC disagrees as in this sentence 'modern sources' encompasses both modern reference sources and modern editions.

LC comment at 6.0.2.3. ACOC agrees with LC.

LC comment at 6.1.1.01. ACOC agrees with LC.

LC comment at 6.1.1.0.2. ACOC agrees that the term "special types" should be avoided. However, we note that LC's suggested replacement text also changes the style of the instruction. Is the following closer to the RDA style (it parallels 6.0.1.3)?

For instructions on constructing access points representing musical works (see 6.17.1), legal works (see 6.23.1), religious works (see 6.28.1), and official communications (see 6.33.1).

Similar changes could be made at 6.1.1.7.2, 6.2.0.3.2, and 6.2.0.4.4.

6.1.1.0.3. ACOC finds this sentence too long, and suggests two alternatives below. These suggestions also use "add to" in place of "make additions to" per our general comment; and replace "following the" with "according to" as has been used in other instructions.

Either use parenthesis to separate specifics:

If the access point constructed following according to the instructions given under 6.1.1.1–6.1.1.6 is not distinctive (i.e. is identical or similar to an access point representing a different work, or to an access point representing a person, family, or corporate body), make additions add to the access point following the instructions given under 6.1.1.7.

Or remove specifics (give these if needed at 6.1.1.7 –see also suggested revisions to that instruction):

If the access point constructed according to the instructions given under 6.1.1.1–6.1.1.6 is identical or similar to another access point, add to the access point following the instructions given under 6.1.1.7.

- **LC comment at 6.1.1.1 and 6.1.1.2.** ACOC would like to discuss, noting our previous discussions on this point (Draft 5JSC/M/204.6).
- *6.1.1.1- 6.1.1.3 ACOC understands that the instructions are intended to cover the preferred access point for the creator, rather than anyone performing another role. However this is not made sufficiently explicit in the instructions and can be picked up only through the phrase "creating the work" in 6.1.1.1, "two or more creators" in 6.1.1.2, and is absent from 6.1.1.3.
- **6.1.1.2.1, examples.** ACOC would like to see an example that illustrates a case where the preferred access point has been constructed using the name found in reference sources, rather than the name found first in resources embodying the work.
- **LC** comment at 6.1.1.3.1-6.1.1.3.3. ACOC agrees that the compiler as creator should be covered at 6.1.1.1 and 6.1.1.2, and would like to discuss LC's suggestion.
- **LC** comment at **6.1.1.3.4.** ACOC would like to discuss LC's suggestion. Presumably the same method, i.e. constructing separate access points for each work, would also be used to provide subject access or access to related works.
- **6.1.1.4.** ACOC would welcome a simplification of the wording of this instruction, e.g.

If the work is an adaptation or revision of a previously existing work that substantially changes the nature and content of <u>a</u> that work, and is presented as the work of the person, family, or body responsible for the adaptation or revision, construct the preferred access point representing the new work by combining (in this order):

- a) the preferred access point for the person, family, or body responsible for the adaptation or revision, formulated according to the guidelines and instructions given under 9.1.1, 10.1.1, or 11.1.1, as applicable
- b) the preferred title for the adaptation or revision, formulated according to the instructions given under 6.2.

Omission of the clause: "is presented as ..." does not appear to introduce any ambiguity.

If JSC agreed, similar changes might be made at other instructions, e.g. 6.1.1.5.

LC comment at 6.1.1.4.1. ACOC agrees, but notes (3) is affected by LC's later recommendation to delete that instruction. Re (2) ACOC also agrees to LC's comments on 'one' at other instructions.

LC comment at 6.1.1.4.3. ACOC notes that the reference to 6.1.1.2 only covers collaborative works, not the case of works commonly cited by title.

LC comment at 6.1.1.6. ACOC agrees with LC.

6.1.1.7

(1) ACOC suggests the following to parallel 6.1.1.0.3.

If the access point constructed according to the instructions given under 6.1.1.1–6.1.1.6 is identical or similar to another access point, add:

- a) a term indicating the form of work (see 6.4)
- b) the date of the work (see 6.5)
- c) the place of origin of the work (see 6.6)

and/or d) a term indicating another distinguishing characteristic of the work (see 6.7).

Apply this instruction if the access point is identical or similar to an access point representing a different work, or to an access point representing a person, family, or corporate body.

(2) re d) ACOC notes that the instruction at 6.7 is applied only to distinguish between works with the same title, form, date, and place of origin, but this is not clear from the wording "and/or" given in this instruction. [Comment repeated from 5.3.2.]

LC comment at 6.1.1.7.1. ACOC agrees with LC.

6.1.1.7.2 Please see comment re "special types" at "LC comment at 6.1.1.0.2".

LC comment at 6.1.2.2.1 ACOC agrees with LC.

LC comment at 6.1.2.3.3. ACOC would like to discuss.

LC comment at 6.1.3 ACOC agrees with LC.

LC comment at 6.1.4. ACOC would like the nature of this issue to be clarified by LC.

LC comment at **6.1.4.1.2.** ACOC welcomes simplification of this instruction. "of the creator' should be 'for the creator'.

LC comment at **6.1.4.2.1.** ACOC welcomes simplification of this instruction, but would like to discuss the omission of "provided the title of the part is distinctive" both here and at **6.1.4.2.2.**

LC comment at 6.1.4.3.1 ACOC welcomes simplification of this instruction.

6.2.0.2 Sources of information. Please see related comments at **LC comment at 6.0.2 Sources of information.**

LC comment at 6.2.0.2.2 ACOC disagrees, per 6.0.2.2.

6.2.0.3.2 Please see comment re "special types" at "LC comment at 6.1.1.0.2".

6.2.0.4.4 Please see comment re "special types" at "LC comment at 6.1.1.0.2".

LC comment at 6.2.1.1.1. As noted in our comments on 6.0.2, the sources of information from chapter 2 are appropriate to describing the manifestation, not the work or expression, and "use in resources embodying the work" seems sufficient direction. A reference to the ca. 36 pages of instructions at 2.1-2.3 is not helpful as few will have any bearing on determining the source for the preferred title.

LC comment at 6.2.2.1.1 ACOC disagrees, per 6.0.2.2.

LC comment at 6.2.2.2. ACOC agrees with LC.

LC comment at 6.2.2.2.3 ACOC agrees with LC.

*6.2.6.2.2 The concept of recording the preferred title of the part as a subdivision of the preferred access point for the whole work is missing from this instruction.

LC comment at 6.2.6.3.2 (on the alternative at 6.2.6.3.3?) ACOC would like to discuss LC's suggestion, noting that the use of selections was discontinued based on a decision made at the October JSC meeting (see Draft 5JSC/M/187.17.1). What arguments are there in favour of the different alternatives "excerpts", "extracts", "selections" or "parts"?

LC comment at 6.2.7. ACOC agrees with LC.

- **6.2.7** ACOC would like examples of the use of these collective titles to be added to RDA.
- **LC comment at 6.2.7.1 -6.2.7.3.** ACOC had assumed that the decision made at the October JSC meeting (see Draft 5JSC/M/187.17.1) also applied to compilations. We agree that their use should be optional. We would welcome further discussion of the usefulness of these instructions, and whether they should only be assigned if the title is not distinctive.
- **LC** comment at **6.2.7.1.2**, new alternative and **LC** comment at **6.2.7.2.1**. ACOC agrees in principle, but would probably prefer to give this as an instruction, and refer to 6.2.7.2, i.e. "If the person, family or corporate body only produced works in one form, see 6.2.7.2."
- *6.2.7.3.2. ACOC had assumed that the decision made at the October JSC meeting (see M/187.17.1) meant that the alternative would be the instruction, and so would welcome further discussion to resolve this.
- **LC comment at 6.3.0.2.1** ACOC would like to confirm what additional sources would be covered by this change.
- **LC** comment at 6.3.0.3.1. ACOC would like to discuss, noting the current wording reflects the caption for the instruction.
- **LC** comment at 6.3.0.3.2 and 6.3.0.3.2 footnote. ACOC would prefer to see the additional guidance incorporated into the instruction. ACOC considers this additional guidance useful in determining when to apply the optional instruction.
- **LC** comment at 6.3.1.1.1 ACOC agrees but notes that 'different' would then need to be deleted from earlier in the sentence.
- **LC comment at 6.3.2.2** ACOC would like to confirm what additional sources would be covered by this change.
- LC comment at 6.3.2.3.1. ACOC agrees as 'as required' is ambiguous.

*6.4 Form of work.

- (1) Some guidance could usefully be provided about the types of forms that are suitable and not suitable for additions to works. ACOC notes that although this element is equivalent to FRAD 4.4. Form of work, the description in FRAD "Includes forms, genres, etc. (e.g., novel, play, poem, essay, biography, symphony, concerto, sonata, map, drawing, painting, photograph, etc.)" would conflict with RDA.
- (2) ACOC also notes the potential for overlap with 6.11 Content type which is an attribute at the expression level, equivalent to FRAD 4.5 Form of Expression. Again, some extra guidance at RDA 6.4 is needed to make the distinction between the two clearer. This comment has been included here, rather than at 6.11 Content type, as that instruction is defined adequately.

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LC comment at 6.4, footnote 5 [and later equivalent comments]. ACOC agrees to add "one of the additions that can be used as", but would prefer to retain "required when". Please also note that 6.7 is an option of last resort, and this should be reflected in the footnotes.

***6.5.1 Date of creation and 6.5.2 Date of first publication or release. ACOC notes that the date of creation will not necessarily be known, and would like the instruction to include further guidance to reduce uncertainty in how to apply it. Should the date of first publication or release (6.5.2) be the only date given if the date of creation is not known? Should the cataloguer extrapolate a date of creation? As the element is required, and it can be taken from any source, how much research should be entered into? [A similar comment is made at 6.12 Date of expression.]

LC comments at 6.5.1 and 6.5.2. ACOC would like to discuss.

LC comment at 6.6.0.1.1. ACOC would like to discuss.

***6.10 Identifier for the work. ACOC would like the instruction to explicitly mention the use of record numbers as identifiers (per JSC's decision to allow this). We would also like to see the discrepancy with FRAD noted, as these numbers are excluded from FRAD "http://www.ifla.org/VII/d4/FRANAR-ConceptualModel-2ndReview.pdf, Identifiers, page 14 "These identifiers are limited to those associated with entities and do not include record numbers assigned to authority records."

LC comment at 6.11. ACOC would like to discuss in relation to the MARC mapping exercise.

LC comment at 6.11.0.1.1. ACOC agrees with LC.

LC comment at 6.11.0.3.2. ACOC agrees with LC.

LC comment at 6.11.0.3.3 and 6.11.0.3.4. ACOC agrees with LC.

***6.12 Date of expression. ACOC notes that the date of expression will not necessarily be known, and would like the instruction to include further guidance to reduce uncertainty in how to apply it. [A similar comment is made at 6.5 Date of creation.]

LC comment at 6.13.0.5. ACOC agrees with LC.

LC comment at 6.13.0.5.2 ACOC would like to discuss.

LC comment at 6.13.0.6.1 ACOC agrees with LC.

6.14 Version. ACOC would like JSC to consider whether either a reference to the instructions on recording editions or some explanation of the difference between these elements is needed.

***6.16 Identifier for the expression. [Comment repeated from 6.10] ACOC would like the instruction to explicitly mention the use of record numbers as

identifiers (per JSC's decision to allow this). We would also like to see the discrepancy with FRAD noted, as these numbers are excluded from FRAD "http://www.ifla.org/VII/d4/FRANAR-ConceptualModel-2ndReview.pdf, Identifiers, page 14 "These identifiers are limited to those associated with entities and do not include record numbers assigned to authority records."

- **6.17-6.35 Additional instructions.** ACOC does not have any comments to make on these instructions, except for the specific instructions mentioned in the cover letter, and an editorial comment.
- ➤ 6.24 Preferred title for a legal work use of "etc"

 ACOC considers that ideally the use of "etc" would cease, however we do not have a suitable replacement to suggest.
- ► 6.28.1.3 General instructions on theological creeds, confessions of faith, etc. distinction between one and more than one body

 Having received advice from theological experts, ACOC considers that the preferred access point for all theological creeds, confessions of faith, etc., should be the preferred title of the work, and that there is no need to maintain the existing distinction between 6.28.1.3.1 and 6.28.1.3.2. Additional access points for the related body would be given according to the general instructions.
- **6.31.0.4.4** [Editorial] Instructions labelled a)-c) are missing separate numbering.

Section 3: Recording attributes of person, family, and corporate body

ACOC notes that international standard identifiers for these entities are in the early stages of use. Given this we don't think it is possible to require any particular identifiers at present; however we support requiring identifiers if known. (Please also see our comments on required elements at 5.3.) Requiring specific identifiers should be reconsidered after RDA's initial release.

Chapter 8: General guidelines on recording attributes of persons, families, and corporate bodies

- **8.0.3** [Editorial] ACOC wonders whether a semi-colon should be used to separate the three parts of this instruction, or whether an alternate layout could be used to break down this long sentence.
- **8.1.0.1** [Editorial] ACOC suggests deleting 'a number of' from the second sentence.
- LC comment at 8.0. See ACOC's general comment 4. Need for a section overview.
- **LC comment at 8.2.** ACOC prefers that the objectives and principles that are relevant to this section be given in this section. One of the goals of RDA is to show the relationship between the RDA principles and the specific data that is recorded.

8.3 Required elements.

***Relationship to Functional objectives and principles. Although there is an implicit assumption that the elements are required in order to meet the Functional objectives and principles, ACOC believes it would assist the cataloguer to have that explicitly acknowledged in this section. In particular the role of the preferred access points in achieving these objectives should be addressed.

Assigning the status of 'preferred' to one access point is essential in a database containing linked bibliographic and authority records (scenario 2). ACOC would like the JSC to discuss whether preferred access points are necessary in a relational database (scenario 1).

[Similar comments made at 8.3]

ACOC would also like the JSC to discuss whether the functional objectives and principles in 8.2 can be met without requiring any variant names to be recorded.

LC comment at 8.3. ACOC prefers the layout given in the draft.

LC comment at 8.3.1 on 8.3.2. ACOC sees value in retaining the lists of required elements here. We note that the elements can be recorded as additions to the preferred access point *or* as elements. This is an example of **General comment 1. Covering multiple scenarios**, noted above.

LC comment at 8.4. ACOC notes that only 8.4.1 is limited to names, and so does not agree that the heading needs to be changed.

LC comment at 8.4.2. ACOC agrees with LC.

LC comment at **8.5.0.1.** ACOC questions the validity of a 'take what you see' approach to naming persons, families or corporate bodies as these are intentionally controlled.

LC comment at 8.5.1.1b1. ACOC agrees with LC.

LC comment at **8.5.2.1.** ACOC is not sure that this is necessary. (ACOC notes that LC's suggestion requires editing to replace the reference to a 'title for a work' with a 'name'.)

8.5.2.2 [Editorial]. Although 11.1.1.8 covers the addition of the number, 11.7.0.7 has the actual instructions on how it is to be recorded. Should the reference be to 11.7.0.7?

LC comment at 8.5.3.1. ACOC requests additional information about LC's suggestion.

LC comment at 8.5.3.2. ACOC agrees with LC.

LC comment at **8.5.4.1.** ACOC would like to discuss further. We would like to hear the arguments in favour of limiting these instructions by using phrases such as 'appearing in the source of information' rather than broader phrases such as 'used by the bearer of the name'. Please also see comment 3 above on consistency in wording regarding sources of information.

LC comment at **8.5.6.1.** ACOC would like to discuss further. We would like to hear the arguments in favour of limiting these instructions by using phrases such as 'appearing in the source of information' rather than broader phrases such as 'used by the bearer of the name'. Please also see comment 3 above on consistency in wording regarding sources of information.

LC comment at 8.7.2. ACOC would like to discuss LC's suggestion. Doesn't 8.7.1 cover the variant name, and 8.7.2 only additions to that name?

> 8.10 Status of preferred access point - Values used ACOC would appreciate terms which are more readily understood, and would welcome a discussion of the values to record.

LC comments at 8.11.0.1.1 and 8.11.0.3.1. ACOC would like to discuss whether RDA should refer to codes here.

LC comment at 8.12.0.1.1. ACOC agrees with LC, and use standard phrase to cover throughout RDA whenever these additional sources are included.

LC comment at 8.12.0.3.1 (1) ACOC would like to discuss. (2) ACOC would like wording to be added to cover this.

LC comment at 8.12.0.3.3. ACOC would like to be able to indicate whether information was or was not found in the sources consulted. Should there be separate elements, or should the information be added to the examples?

8.13 Cataloguer's annotation. [Comment similar to LC's] ACOC notes that the annotations are a mix of information of use only to the cataloguer and information of use to other users of the catalogue. [Similar comments at 5.10, 8.13, and 29.7]

Chapter 9: Identifying persons

LC comment at General comment for ch. 9. ACOC agrees that a single form should be given.

LC comment at 9.0.2.2. ACOC agrees that any source can be used for variant names.

LC comment at 9.1.1.1.2. ACOC would like to discuss LC's comment.

LC comment at Between 9.1.1.2 and 9.1.1.3. [Presume LC comment relates to 9.1.1.1.2] ACOC agrees to add context, but notes that these additions are not only restricted to breaking conflicts as they can also be made as optional additions in later instructions.

LC comment at 9.1.1.1.3. ACOC agrees with LC.

LC comment at 9.1.1.3.1. ACOC would like to discuss.

LC comment at 9.1.1.3.2. ACOC is uncertain about the suggested revision, since the addition of dates would always meet the criteria. Another form of wording may avoid this issue.

LC comment at 9.1.1.4.2 ACOC is uncertain about the suggested revision, since the addition of a fuller form of name would always meet the criteria. Another form of wording may avoid this issue.

9.1.2.11. [Editorial] ACOC appreciates the simple style used in most of the chapter 9 instructions, but offers this further simplification:

When constructing a variant access point to represent a person, uUse a variant name for the person (see 9.3) as the basis for the a variant access point.

LC comment at 9.2.0.2 ACOC would like to discuss as part of general discussion on IME-ICC.

LC comment at 9.2.1.2. ACOC agrees with LC.

9.2.1.2a & 9.2.1.2b. [Editorial] ACOC notes that these instructions are misnumbered.

LC comment at 9.2.1.2b ACOC would like to discuss LC's suggestion.

9.2.3.1 [Editorial] Suggest re-wording:

Follow thise same instruction for a person who has acquired and become known by a title of nobility (see also 9.2.13).

*9.2.4 Individuals with more than one identity

Individual. ACOC is uncertain why 'individual' has been used in these instructions, and would prefer that 'person' be used instead.

Definition. ACOC notes that it will be essential to define pseudonym appropriately, and we offer the following suggestion:

A pseudonym is a name used by a person (either alone or in collaboration with others) that is not the person's real name.

Alternatively, 'other persons' could replace 'others' in the definition.

Context. ACOC also notes that the context for this instruction is not clear. A cataloguer working under scenario 2 may be confused as to whether they are choosing the preferred name for the authority record(s) or for the bibliographic record. This is an example of **General comment 1**. **Covering multiple scenarios**, noted above.

LC comment at 9.2.4.1. ACOC agrees with LC but would prefer to keep the first sentence of this instruction simple, and to define pseudonym to cover joint pseudonyms per our comment at 9.2.4.

*9.24.2 ACOC believes that this exception is not needed and in fact is not an exception because the pseudonym would be chosen as the preferred name using 9.2.4.1 in any case. What is 'exceptional' is the recording of a person's real name even if it is not used. This could be covered at 9.2.4.3, e.g.

Record a name not chosen as the preferred name for an identity as a variant name (see 9.3). Apply this instruction to a person's real name, if known, regardless of whether it appears in resources associated with that person.

LC comment at 9.2.4.2. ACOC would like to discuss per our previous comments. Although the specific role is not significant, the instruction is applied when the real name is not used on resources.

LC comment at 9.2.5.1.3. ACOC would like to discuss.

LC comment at 9.2.6.1.3 ACOC agrees that this instruction is difficult to read. If LC's suggestion is accepted, it might increase readability to use commas to separate the qualifying phrase i.e. "Record, as variant names, forms ..."

9.2.6.2.1 [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions:

Record as the first element the part of the compound surname by which the person bearing the name prefers to be listed as the first element. If this is unknown, record as the first element the part of the name under which the person is listed in reference sources in the person's language or country of residence or activity as the first element.

9.2.6.4.1 [Editorial] ACOC suggest the following to improve readability and consistency within the instructions (changes not marked):

If the person's language is Czech, French, Hungarian, Italian, or Spanish, record the first part of the compound surname (regardless of its nature) as the first element. In all other cases, record the husband's surname as the first element. For hyphenated names, follow the instructions given under 9.2.6.3.

LC comment at 9.2.7.2.3. ACOC agrees with LC.

LC comment at 9.2.7.3.2. ACOC agrees with LC.

9.2.7.2.1 [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions:

If a surname includes an article or preposition, or a combination of the two, record as the first element the part most commonly used as the first element in

alphabetically arranged directories, etc., in the person's language or country of residence or activity <u>as the first element</u>.

9.2.7.2.2 [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions:

If such a name is listed in a nonstandard fashion in reference sources in the person's language or country of residence, record as the first element the part of the name used as the first element in those sources as the first element.

LC comment at 9.2.8.3. ACOC agrees with LC.

LC comment at 9.2.9.1. ACOC would like to discuss: is the instruction covering an individual who has lost or renounced the throne or a royal house that has lost or renounced the throne (or both)?

LC comment at 9.2.9.2 ACOC agrees with LC.

9.2.9.2 [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions

Record the surname as the first element. If there is no surname, record as the first element the part of the name that is used to identify the person in resources or in reference sources (e.g., name of the house or dynasty, territorial title) as the first element.

- 9.2.10-9.2.16 ACOC has not examined these instructions.
- 9.2.10 ACOC agrees with LC comments on following "title" with "of nobility".
- **9.2.10.1.2** [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions.

Record as the first element the proper name in a title of nobility (including courtesy titles) as the first element if the person:

LC comments at 9.2.10.1.4, 9.2.14.1.5. ACOC would like to discuss placement of instructions on saints.

LC comment at 9.2.10.1.5 ACOC agrees, and note that the addition of commas may also assist in readability.

LC comment at 9.2.11 ACOC agrees an instruction is needed.

LC comment at 9.2.14. ACOC would like to discuss LC's suggestion.

9.2.14.1.2 [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions.

Record as the first element the part of the name under which the person is listed in reference sources as the first element. In case of doubt, record the last part of the name as the first element, following the instructions given under 9.2.5.3.

LC comment at 9.2.17 ACOC agrees with LC.

LC comment at 9.2.17.1.2. ACOC would like to discuss whether the existing instruction omits the typographical devices because they are likely to vary between resources.

9.2.18.1.4 [Editorial] ACOC suggest the following changes to improve readability and consistency within the instructions.

If, however, such a name has the appearance of a forename, forenames, or initials, and a surname, record as the first element the word that has the appearance of a surname as the first element.

LC comment at 9.2.18.1.3 ACOC agrees with LC.

LC comment at 9.2.20 ACOC agrees an instruction is needed.

LC comment at 9.2.22.3 ACOC agrees with LC.

LC comment at 9.3.0. ACOC would like to discuss LC's comment. This is an example of **General comment 1. Covering multiple scenarios**, noted above.

LC comments at 9.3.0.2.1, 9.3.1.2.1, 9.3.3.2.1, 9.3.4.2.1, 9.3.6.2.1, 9.3.7.2.1 ACOC would like to confirm what additional sources would be covered by this change.

LC comment at 9.3.1.3.1 ACOC would like to discuss. Although the specific role is not significant, the instruction is applied when the real name is not used on resources.

LC comment at 9.3.6.1.1 ACOC agrees with LC.

LC comment at 9.3.6.3.1 ACOC considers that these are grouped examples of alternative linguistic forms and don't require separate instructions.

LC comment at 9.3.7.3. ACOC would like to discuss the benefits of giving separate instructions.

LC comment at 9.4, footnote 10. [and similar footnotes] ACOC would like to discuss.

LC comments at 9.4.1, 9.4.2 and 9.4.3 ACOC would like to discuss what it means to require a "date associated with a [person, family or corporate body]" when there are separate sub-elements.

LC comment at 9.4.1.3.3 & 9.4.2.3.2: (1) and (2). ACOC agrees with LC.

LC comment at 9.6.0.1.1 ACOC agrees with LC.

9.8 Gender

As there has been some discussion of the value of this element, ACOC would like to affirm the incorporation of this element in RDA. We note that gender is an attribute of person in the FRAD conceptual model, has been used in other metadata frameworks such as indees, and can be coded in INTERMARC and UNIMARC. We also note that the inclusion of gender (and other attributes of persons taken from FRAD) results in authority data that is useful to users of the catalogue, as well as to cataloguers.

> 9.8 Gender – Values used

Thanks to Glenn E. Patton of OCLC and Reinhold Heuvelmann of the German National Library, who posted to RDA-L with the information given in the table below.

RDA	INTERMARC ¹	UNIMARC ²	ISO/IEC 5218 ³
female	female	female	female
male	male	male	male
other		transgender	
not known	unknown	unknown	not known
		not applicable	not applicable

- 1. INTERMARC authorities (http://www.bnf.fr/pages/infopro/produits/pdf/pb-RIMA_008.pdf).
- 2. UNIMARC Authorities format. (http://www.ifla.org/VI/8/projects/UNIMARC-AuthoritiesFormat.pdf).
- 3. ISO standard ISO/IEC 5218 "Information technology Codes for the representation of human sexes" http://standards.iso.org/ittf/PubliclyAvailableStandards/index.html)

ACOC considers that the values included in the RDA draft are those necessary to support user tasks.

We note that 'other', widely used as a catch-all category in other parts of RDA, might be considered offensive when applied to people, and so we would also be happy to consider further refinements to the terminology.

LC comment at 9.12-9.17. ACOC is interested in discussing how this might be covered.

Chapter 10:Identifying families

Note: If there is a similar LC comment for Chapter 9, the ACOC response has not been repeated here on the assumption that the JSC's decisions on one chapter will cover similar cases in other chapters.

LC comment at 10.1.1.3-10.1.1.5. ACOC agrees with LC.

> 10.4.0.3. Recording type of family – Values used

*ACOC does not have any comments on the specific terms included. Given that the inclusion of family names is a new feature of RDA, we would like these terms to be defined in the Glossary for first release. We await the responses of other constituencies with interest. If necessary, we would support treating the terms for types of families as examples only for the first release of RDA, and the setting up of a

working group with members of the archives community to determine appropriate terms to include in a controlled list.

ACOC agrees with LC's suggestion to allow other terms.

LC comment at 10.6.0.3 (1) ACOC agrees with LC that a reference should be given to chapter 16.

Chapter 11:Identifying corporate bodies

Note: If there is a similar LC comment for Chapter 9, the ACOC response has not been repeated here on the assumption that the JSC's decisions on one chapter will cover similar cases in other chapters.

LC comment at 11.0.1.1, footnote 1. ACOC supports the definition given in RDA, noting that it is very similar to the first sentence of the AACR definition.

ACOC would like to discuss whether any of the additional guidance offered in the paragraphs at 21.1B1 should be carried forward to RDA, and if so, where it should be added. We note that some of this text now appears in 11.2.0.3.1, and that LC has recommended deleting that text.

LC comment at 11.1.1.2. ACOC would like to discuss LC's comment. ACOC sees some similarity between the use of an uncontrolled term at 11.1.1.2, combined with the use of a category for Type of corporate body 11.6, and the use of an uncontrolled term at 6.4 for Form of work, combined with the use of a category of work at 6.11 Content Type.

LC comment at 11.1.1.4 ACOC would like to discuss.

LC comments at 11.1.1.8.1, b) paragraph, 11.1.1.8.2 and 11.1.1.8.3. ACOC agrees with LC.

LC comment at 11.1.1.8.4 ACOC would like to discuss.

LC comment at 11.1.2.1.2 ACOC agrees with LC.

LC comment at 11.2.0.3.1. ACOC would like to discuss. This instruction is not about whether to record capitalisation or initial articles, but about how to use the information presented on the source to determine whether the body has a name.

LC comment at 11.2.0.6.1 ACOC agrees with LC.

LC comment at 11.2.0.6.2 ACOC agrees with LC.

LC comment at 11.2.0.10.1 ACOC agrees that "script" should replace "language" as only scripts need to be transliterated.

LC comment at 11.2.0.10.2 ACOC would like to discuss.

LC comment at 11.2.2.1 The existing language seems clear. If JSC accepts the revised wording that LC has suggested, should it refer to 'new name' and 'old name' or 'earlier name' and 'later name'?

LC comment at 11.2.3.1.1 ACOC agrees with LC.

LC comment at 11.2.3.2.4 ACOC agrees with LC.

LC comment at 11.2.3.2.6 ACOC would like to discuss where this should be placed.

LC comment at 11.2.3.3 ACOC agrees with LC

LC comment at 11.2.6.2 ACOC agrees with LC

LC comment at 11.2.16, subhead. ACOC agrees with LC

LC comment at 11.3.0.1.1 ACOC agrees with LC.

LC comment at 11.3.0.3.4 ACOC agrees with LC (and presumes it wasn't italicised following the Chicago Manual of Style.)

11.4.0.1 Scope The two examples in the parenthetical are the only element subtypes for this element. Should the "e.g." be replaced with "i.e."?

LC comment at 11.4, scope ACOC agrees with LC.

LC comment at 11.4.1.1.2 ACOC does not understand the reason for LC's question. The location of a conference is included at 11.1.1.8.1 c) as an addition to the name when constructing an access point.

LC comment at 11.4.1.3 ACOC is uncertain where there is guidance in 11.5.1.3.1 on repeating the element?

LC comment at 11.5.0.3.2 ACOC agrees with LC that a more specific date should be mentioned.

LC comment at 11.5.3.1.1 ACOC agrees with LC that this situation should be covered.

LC comment at 11.6.0 ACOC would like to discuss LC's suggestion.

LC comment at 11.6.0.3 ACOC would like to discuss LC's suggestion.

LC comment at 11.7.0.4.2 ACOC would like to discuss LC's suggestion.

LC comment at 11.7.0.5.1 ACOC agrees with LC.

LC comment at 11.7.0.6.1 ACOC would like to discuss LC's suggestion.

LC comment at 11.7.0.7.2 ACOC would like to discuss LC's suggestion, noting that 11.7.0.7.1 refers to 'inferred'.

LC comment at 11.12.0.3.2 ACOC agrees with LC's suggestion, and would also like to make this change for other identifiers.

Section 4: Recording attributes of concept, object, event, and place

Chapter 16:Identifying places

LC comment at 16.0.2.1 & 16.2.0.2.1 ACOC would like to discuss.

LC comment at 16.2.3.1 ACOC agrees with LC.

***16.3 Variant name for the place. ACOC is uncertain whether variant names for places should be included in the first release of RDA, given the scope of this chapter which is currently limited to place names used as the name of the government, or used in additions to other names. As preferred and variant access points for places are not in scope it is not clear where the variant name for the place would be recorded.

LC comment at 16.3.0.1.1. Agree LC, however prefer 'A variant name for a place is ..."

****ACOC is uncertain whether identifiers for places should be included in the first release of RDA, given the scope of this chapter which is currently limited to place names used as the name of the government, or used in additions to other names.

Section 9: Recording relationships between persons, families, and corporate bodies

Chapter 29: General guidelines on recording relationships between persons, families, and corporate bodies

- **LC** comment at 29.02 (1) ACOC agrees that information on the context is needed. (2) Because the relationship can be indicated through an identifier *or* a preferred access point, we would prefer not to make the addition suggested by LC.
- **29.1.1.2** [Equivalent LC comment] ACOC would prefer that the definition for person match that given in 8.1.1.2.
- **29.1.4.2** ACOC would prefer that the final phrase "as a result of a change of name" be deleted, as it doesn't encompass all the situations where a body precedes or succeeds another.
- **29.2.2** ACOC would like to replace the ambiguous phrase "all significant relationships" with "all significant bibliographic relationships" or similar.

- *29.3.1 (1) ACOC notes that although the context is 'recording relationships' the actual data which is required is that needed to identify the related person, family, or corporate body, and so we suggest the following:
 - "When recording relationships between identifying related persons, families, and corporate bodies, include as a minimum the elements listed below that are applicable to the related person, family, or corporate body."
- (2) The required elements needs to be presented differently here than in chs 9-11, as 29.4 allows the relationship to be indicated through an identifier *or* a preferred access point.
- **LC comment at 29.3.1.** Because the relationship can be indicated through an identifier *or* a preferred access point, we would prefer not to make the change suggested by LC.
- *29.4.2 ACOC would like JSC to discuss what 'in conjunction with' means. When used elsewhere in RDA, it is in the context of constructing an access point. [Comment repeated at 29.5.0.3.1 30.1.0.3.2, 31.1.0.3.2, 32.1.0.3.2.]
- *29.5.0.3.1. ACOC would like JSC to discuss what 'in conjunction with' means. When used elsewhere in RDA, it is in the context of constructing an access point. [Comment repeated at 29.5.0.3.1 30.1.0.3.2, 31.1.0.3.2, 32.1.0.3.2.]
- **29.7.0.3** ACOC notes that the annotations are a mix of information of use only to the cataloguer and information of use to other users of the catalogue. [Similar comments at 5.10, 8.13, and 29.7]

Chapter 30: Related persons

*30.1.0.3.2. ACOC would like JSC to discuss what 'in conjunction with' means. When used elsewhere in RDA, it is in the context of constructing an access point. [Comment repeated at 29.5.0.3.1 30.1.0.3.2, 31.1.0.3.2, 32.1.0.3.2.]

Chapter 31:Related families

*31.1.0.3.2. ACOC would like JSC to discuss what 'in conjunction with' means. When used elsewhere in RDA, it is in the context of constructing an access point. [Comment repeated at 29.5.0.3.1 30.1.0.3.2, 31.1.0.3.2, 32.1.0.3.2.]

Chapter 32: Related corporate bodies

*32.1.0.3.2. ACOC would like JSC to discuss what 'in conjunction with' means. When used elsewhere in RDA, it is in the context of constructing an access point. [Comment repeated at 29.5.0.3.1 30.1.0.3.2, 31.1.0.3.2, 32.1.0.3.2.]

Appendix F: Additional instructions on names of persons

ACOC has no comments on this appendix. We will offer comments on the appendix when it is reviewed after the first release of RDA.

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Appendix G: Titles of nobility, terms of rank, etc.

ACOC has no comments on this appendix.

Appendix H: Conversion of dates to the Gregorian calendar

ACOC has no comments on this appendix.