TO: Joint Steering Committee for Development of RDA

FROM: Alan Danskin, British Library representative to JSC

SUBJECT: Proposed Revision of RDA Instructions for Government and Non-Government Corporate Bodies

BL thanks ALA and the CC:DATask force for their excellent review of this complex area. The BL agrees with the changes proposed, with the exception of recommendation 8.

In our view, the Type 6 categorization of names supports collocation, because names of subordinate bodies are not prevented from filing under the name of their superior body by accidents of presentation. We believe that because names which incorporate the name of the parent body *are* ambiguous, the guidance provided by Type 6 is useful

Retention of Type 6 would help to avoid inconsistency arising from subjective interpretation of presentation. For example, in the absence of Type 6, the example *Annual Meeting of the International Whaling Commission* would be entered in direct order by a cataloguer who considered the entire phrase to be the name; the name would fail Type 3 by virtue of containing the name of the higher body. However, another cataloguer could consider it to be a phrase that grammatically links the names of the subordinate and higher bodies, and would therefore enter the *Annual Meeting* subordinately under Type 3. Retention of Type 6 ensures that the name is entered subordinately in either case, thereby promoting consistency.

We note, that the other recommendations either remove duplication between Types of corporate and government bodies, or improve consistency by rationalising definitions. We don't believe that recommendation 8 does either of these, nor is it shown that there would be a benefit from removing this Type. We believe, that in practice, the elimination of Type 6 would create another very large category of established authorised access points in the LC/NAF requiring retrospective amendment for conformance with RDA. This category would be difficult to identify and is probably not amenable to automated correction.