

To: Joint Steering Committee for Development of RDA

From: Kevin Marsh, ACOC Representative

Subject: Proposed revision of RDA 16.2.2 (Preferred name for the place)

ACOC thanks ALA for this proposal. We have concerns about particular aspects of the proposal and these are noted below against each ALA recommendation.

In addition we would like to raise a more general concern. In our view, it is preferable that the instructions relating to recording the preferred name of a place should be applicable to all countries wherever possible. As an international standard, we think that it is in the long-term best interests of RDA that any Anglo-American bias should be removed.

We would prefer that instructions on formulating access points should be consistent where possible, i.e., that options and exceptions should be avoided in order to facilitate the international exchange of data. We would prefer a single and consistent instruction to cover the situations in 16.2.2.9-16.2.2.11. Such an instruction would allow the name of the place, the first level administrative level, and the name of the country to be recorded in all cases. We consider that this would fit well with the work ALA is proposing in recommendation 6.

1. Places in certain federations (RDA 16.2.2.9)

ALA comment 'It should probably be left to representatives from Australia and Canada to say how much place names in those countries are associated with the name of the state or province, but there seems to be no compelling reason to change the long-standing cataloging practice for those countries.'

ACOC considers that adding the state and territory names to the names of places in Australia has continued value for identification.

ALA recommends that Malaysia be removed from the instructions in RDA 16.2.2.9 and be treated under the instruction for places in other jurisdictions.

ACOC does not accept this recommendation. We are not convinced by the argument that 'most catalog users outside that country are not familiar with the 13 states and three federal territories of Malaysia'. If Malaysian resources are collected by a particular library and sought by an individual user, it does not seem unreasonable to assume a degree of knowledge about Malaysia.

We are also concerned about another of the arguments for change, i.e., that 'Malaysia is the only one not represented among the authors of RDA and its predecessor AACR.' We note the recent announcement that [National Library of Malaysia plans to utilize RDA by next year](#) and urge the JSC to consult with representatives from the National Library of Malaysia before any final decision is made. They might also be usefully consulted for the name of an appropriate gazetteer to be added to the RDA Toolkit to assist cataloguers in adding the names of the states and territories to the place names.

We would however accept the removal of this instruction if this situation was covered by a general instruction. Please also see our comments below at 4. *Qualifiers for Places in China*.

ALA recommends adding the phrase 'a country that was a constituent republic of the former U.S.S.R. or the former Yugoslavia'.

ACOC accepts this recommendation.

2. Places in the Republic of Ireland (RDA 16.2.2.10)

ALA recommends that mention of the Republic of Ireland be removed from RDA 16.2.2.10 and the examples for places in the Republic be moved to the general instructions at the current RDA 16.2.2.11.

ACOC accepts this recommendation.

3. Overseas territories and insular areas [new]

ALA proposes the addition of a new instruction for 'places in overseas territories and insular areas' to be inserted as RDA 16.2.2.11 (current 16.2.2.11 and subsequent instructions to be renumbered), and move appropriate examples from other instructions.

ACOC accepts the recommendation to include a new instruction. The terminology used in the proposed instruction, i.e., 'insular affairs', is not commonly used outside of the United States and so we would prefer that a simpler term was used such as 'islands and island groups'.

4. Qualifiers for Places in China

ALA proposes to add an Optional Addition to the general instruction for Places in Other Jurisdictions [current 16.2.2.11, proposed 16.2.2.12] to allow the name of the first-level administrative division to be recorded preceding the name of the country as part of the preferred name of a place.

ACOC supports this recommendation with some provisos. We agree that the ability to include a first level administrative division is useful for a number of countries. The inclusion of this provision may also allow those libraries who wish to continue to use first order political divisions of place names in Malaysia.

For reasons of consistency and the international exchange of data we would prefer that this was not given as an optional addition, but that it is the general instruction.

We would like some clarification of how the first level administrative division is to be added and note that the examples differ, with one using the English phrase 'Autonomous Region' and the other using the Chinese term for province, i.e. 'Sheng'.

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We also note the recent announcement about the translation of RDA into the Chinese (Mandarin) language and urge the JSC to consult with representatives in China before any final decision is made. They might also be usefully consulted for the name of an appropriate gazetteer to be added to the RDA Toolkit to assist cataloguers in adding the names of the provinces, etc., to the place names.

5. Abbreviation of Virgin Islands [question]

ALA now asks the JSC whether they would be interested in entertaining a proposal to delete abbreviations for place names from RDA Appendix B and to revise the relevant examples.

ACOC continues to support the removal of abbreviations. We are aware of the extensive changes to access points which would be required, but believe that the time has come to proceed with these changes.

Given the particular issue noted regarding the Virgin Islands, we would also accept a proposal to remove that abbreviation from RDA in the interim.

We also note that one of the RDA abbreviations for an Australian state, i.e., 'S. Aust.' for South Australia, is in a form which is not commonly used in Australia.

6. Name of larger place as part of the preferred name [future proposal]

ACOC welcomes ALA's initiative in working on future proposals as outlined.

Please also see our introductory comments. We hope that those comments could be incorporated in future work.