**To:** Joint Steering Committee for Development of RDA

**From:** Bill Leonard, CCC representative

**Subject:** Proposed Revision of RDA 16.2.2 (Preferred Name for the Place)

CCC thanks ALA for the clarification that these proposals will bring to the use of the preferred names of places for identification and disambiguation.

Recommendation #1 Places in certain federations (RDA 16.2.2.9)

CCC concurs with the recommendations.

In response to the statement in the second paragraph concerning place names in Canada, we prefer to continue the long-standing tradition of adding the province or territory to Canadian place names.

Recommendation # 2 Places in the Republic of Ireland (RDA 16.2.2.10) CCC concurs with the recommendation.

Recommendation # 3 Overseas territories and insular areas (new)

CCC agrees with the recommendation to add new instructions covering these territories and insular areas at 16.2.2.11 but questions whether the phrase "overseas territories and insular areas" is entirely clear. The modifier "overseas" might be interpreted as applying to both "territories and insular areas" (as intended) or only to "territories". In the latter interpretation, the instruction could be seen as also applying to islands such as Sicily or Crete. We would like to suggest the addition of some counter-examples of island names which are qualified as well as some examples of towns or cities located on islands which are themselves first-order divisions of larger jurisdictions to avoid this misunderstanding.

We suggest the following counter-examples to the new 16.2.2.11.1:

butSicily (Italy)Crete (Greece)

We suggest adding these examples to the new 16.2.2.11.2:

Saint-Denis (Réunion)
Saint Pierre (Saint Pierre and Miquelon)
but
Palermo (Italy)

Recommendation # 4 Qualifiers for Places in China CCC agrees with the recommendation to add an option to the current instruction 16.2.2.11 (proposed 16.2.2.12) allowing the optional addition of the name of the firstlevel administrative division preceding the name of the country. We also support the inclusion of examples showing the addition of both the first-level jurisdiction and the country names.

Recommendation # 5 Abbreviation of Virgin Islands

CCC agrees to the removal of the abbreviation V.I. from appendix B because of the problem noted in distinguishing between the U.S. Virgin Islands and the British Virgin Islands.

CCC refrains from agreeing completely with the removal of all place name abbreviations from Appendix B because we have practical concerns about legacy data. We recognize the use of abbreviations goes against RDA's general principles as well as posing additional difficulties for internationalization and we appreciate ALA's offer to write a proposal to delete the place names from appendix B. However, we think we should delay such a proposal until we are well established in RDA.

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

CCC welcomes the investigation of the three suggestions made by ALA.