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

**From:** Dave Reser, LC Representative

**Subject:** Creating instructions for using nominative case for titles (RDA 6.2), names

(RDA 8.5), and places (RDA 16.2)

While we appreciate the thought ALA has given to this complex linguistic issue, LC does not agree to this proposal. During our discussion of this proposal, the following concerns were raised:

- We believe this proposal is attempting to address an issue created by lack of language knowledge rather than application of RDA. Our catalogers who work with resources in inflected languages understand that grammatical adjustments should be made before recording names, titles, etc. in authority data because the data will not makes sense otherwise. However, if someone does not know Finnish, it is unlikely that they would recognize that *Suomi* is not in the nominative case and thus they would not realize that this instruction applies.
- We are concerned that this proposal would introduce confusion. The instructions proposed say to record the name, title, or place name, in the nominative case, unless that data is to be accessed under a different case. Many titles, and some names (including place names), contain words that must remain in an inflected form in order to retain their meaning. For example, in these titles, a word is inflected because it follows a preposition (italics indicate prepositions): Peshkom po Arktike [romanized Russian]; Epistulae morales ad Lucilium. In the name Ordo Templi Orientis, the phrase "Templi Orientis" must remain in the inflected form because it is indicating that this is the Order of Oriental Templars. Trying to provide instructions for all these situations seems untenable.
- We believe that grammar rules for languages are best left out of RDA. It would be impossible to accurately and succinctly characterize all the linguistic possibilities for languages might be needed to record data in all languages. There are many excellent instructional resources available in print and online for individual languages that catalogers should avail themselves of when necessary.
- We object to the placement of these instructions in the general recording guidelines instructions because to do so disallows recording inflected forms as variants. When recording the preferred form of name, the form that follows the grammar rules for the language should be used, but we see that it might be helpful to users to record both Lugdunum (France) and Lugduni (France) as variant forms for Lyon (France), and we see no reason to prohibit this.

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• We believe this type of issue is best covered by training or workflows according to the needs of individual agencies. We believe this is why it was not covered in earlier cataloging codes, and should not be part of RDA.