To: Joint Steering Committee for Development of RDA
From: Christine Frodl, DNB Representative
Subject: Treatment of Subjects in RDA

DNB thanks ALA for this Discussion paper. The German experts groups on descriptive and subject cataloguing are in favor of the recommendations offered in this Discussion paper. Nevertheless this Discussion paper should also be discussed in combination with the Proposal 6JSC/Chair/8. Both papers should be proofed regarding their applicability to linked data applications. Although the German experts groups on descriptive and subject cataloguing prefer the approach described in 6JSC/ALA/Discussion/2, the members would recommend waiting until the consolidation of the IFLA FR models has been achieved. Therefore we consider it premature to decide upon both papers within this response and would welcome a comprehensive discussion at the JSC meeting regarding further steps.

General Remarks:

The German Expert Group on Subject Cataloguing is very much in favor of the recommendations offered in this discussion paper. We thank ALA's RDA SAC Subcommittee for preparing the discussion paper. We hope that JSC will accept the strategy proposed in this discussion paper and are looking forward to a subsequent proposal in 2014.

In our opinion, RDA should provide a general framework for subject cataloguing. This framework should, however, be flexible enough to accommodate various kinds of subject cataloguing systems. We believe that the strategy outlined in the discussion paper would ensure that this aim will indeed be reached.

Comments on the Recommendations:

1. General approach to subjects in RDA:

We agree to the general approach described in this paragraph.

2. Choice of model:

In our view, this is the most important recommendation of the discussion paper. We are convinced that FRSAD is the only model flexible enough to accommodate various systems of subject cataloguing. This is particularly important, as RDA aims at being an international code of rules, which can be used by a wide variety of communities (not only within the library world). Therefore it would be counterproductive if the treatment of subjects in RDA were to be based on the group 3 entities of the FRBR model, whose weaknesses are well known.

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The FRSAD Working Group has convincingly shown that the group 3 entities of FRBR are not suitable as a universal matrix for dealing with subjects. From our own experience, we can confirm their results. It is not possible to fit subject indexing according to German practices into the group 3 entities in any satisfactory way. It is even more impossible to work with the group 3 entities in the area of classification.

Therefore, we strongly support this recommendation.

3. Terminology

Although we can see the rationale in FRSAD's use of Latin terms, we agree that the terms "Thema" and "Nomen" would stand out somewhat oddly in the context of RDA. Therefore, we accept the suggestion to rename them as "subject" and "name of subject". Note that "subject" would have to be rendered into German as "Thema" nonetheless, as this is the ordinary German word for "subject".

4. User Tasks

We agree that it would be only logical to include the FRSAD user tasks into RDA. We also agree that the "explore" task should be more widely employed. As the concept of relationships is highly important to RDA, it needs to be stressed that users should be able to explore various kinds of relationships (not only in the area of subjects). In this context, it might be noted that some attributes in RDA (e.g. the place of birth of a person or the affiliation) should rather be seen and treated as relationships.

5. Entities

As already stated in our comment to recommendation #2, we are in favor of basing subject cataloguing on the FRSAD model. Consequently, we agree that there should be only one subject entity in RDA, with an attribute "Name of subject".

6. The Primary Subject Relationship

There can indeed be cases of differences in subject content between expressions. For example, a later expression of a work might cover a wider time span than an earlier expression. We believe, however, that such differences usually are only slight ones. They can perhaps be seen as variations within the subject of a work. Therefore we accept ALA's working hypothesis that a relationship between subject and work would be sufficient in RDA.

7. Subject vs. genre/form

In the German cataloguing community, there has been a long-time demand for a new approach to genre/form aspects. We think that the areas of descriptive cataloguing and subject cataloguing need to work together more closely in order to develop a satisfactory general framework for genre/form, which builds on the coverage of this topic in RDA. To this end, the German Working Group for the Implementation of RDA has just set up a sub-working group. We are very much in favor for exploring this topic more deeply on an international scale and in the wider context of the FR models.

8.-11. Changes to the structure of RDA

Although the proposed structural changes will have a significant impact on RDA as a whole and the numbering of chapters within RDA, we think that it is nonetheless necessary to abandon the structure as it was originally proposed. On the whole, we agree with the recommendations in the discussion paper. We are not yet sure, however, whether "place" should be included in chapter 11, because places also appear as e.g. attributes of persons and in subject cataloguing we have also other types of places as geomorphological units (e.g. rivers, mountains). We think that this question needs to be looked into in more detail.

11. Attributes of the Subject Entity

We accept the attributes proposed in the discussion paper as a working hypothesis. There might have to be amendments in the course of a more detailed analysis.

12. Access Points

The question of access points is an important question. It is desirable that entities used in subject cataloguing are compatible with entities in RDA. This is a difficult topic which needs further investigation as the subject cataloguing systems should remain self-sustaining.

13. Relationships

We accept the suggestions in the discussion paper as a working hypothesis. There might have to be amendments in the course of a more detailed analysis.