To: Joint Steering Committee for Development of RDA

From: Kathy Glennan, ALA Representative

Subject: Simplification of RDA 2.7-2.10

ALA thanks the BL rep for this discussion of options to simplify RDA in relation to the Production, Publication, Distribution and Manufacture Statements. ALA does not have a unified response to this paper or to the answers to the paper's questions. Some commenters were strongly in favor of moving to a single issuance statement, while others believe none of these potential changes are needed to RDA 2.7–2.10. The latter group believes that 6JSC/ALA/29, Clarifying core element status for "not identified" elements in the Distribution and Manufacture Statements (RDA 2.9 and 2.10) and 6JSC/ALA/Discussion/4, Transcription issues associated with the Production Statement (RDA 2.7), present a better approach to these problems.

Response to BL rep recommendations:

- 1. Technical Group to evaluate the merits of direct/indirect linking. Agree.
- 2. *JSC should liaise with FRBR Review Group on these issues*. Strongly agree. As noted in the paper, there are some significant modeling differences, especially regarding the current FRBR Group 3 entities. ALA believes that this consultation should occur before any additional significant work is undertaken in this area.
- 3. *JSC should liaise with ISBD Review Group on the requirement for aggregate statements.* Agree. ALA believes that this consultation should occur before any additional significant work is undertaken in this area.
- 4. *JSC to collaborate with the MARC 21 community to propose appropriate changes and mappings, when the direction of change is clear.*Agree; we endorse this wait-and-see approach.
- 5. No changes to legacy data until tools and vocabularies become available. Strongly agree.

General comments in favor:

The changes proposed provide a method for making cleaner separations of transcribed information and recorded information. A simplified transcribed statement, free of supplied information or interpolations, will better fulfill the RDA principles of representation and differentiation.

An issuance statement comprised of an unparsed transcription will better allow the data to document the information as it appears in the source without transposition or interpolation. Especially in the context of early printed resources, the distinction between printers, publishers, and booksellers is often indistinct by modern definitions; multiple roles/functions may be

combined in a single statement; and grammatical complexity or ambiguity of statements can hinder accurate parsing into distinct elements.

General comments against:

The ISBD-style of presenting PPDM elements as aggregated statements makes it easy for users to scan and parse; transcribed statements from the resource will not have that advantage. The ISBD presentation also is largely compatible with bibliographic citation standards, such as the *Chicago Manual of Style*, and is better aligned with ONIX imprint data. Would recording relationships adequately replace these functions?

The repetition of instructions with minor variations in the PPDM instructions should not be a major concern for RDA, a resource expressly formulated for an online, non-linear presentation.

Although the creation of instructions for a transcribed statement relating to publication (or issuance) would simplify the instructions in 2.7–2.10, this approach would also add to complexity for cataloguers who would also have to consult new instructions about recording relationships in later chapters.

Transcribing issuance statements as they appear on the preferred source will raise questions about the appropriate punctuation used to separate the publisher(s), place(s) of publication, and date(s), as well as how to represent data that appears on separate lines. In addition, the revised instructions appear to require recording street addresses, and they would certainly require including all the stated places of publication, such as the following information commonly found on scores published by Schott in the past decade:

This approach will likely work best for resources with title pages, which have a fairly standard way of conveying issuance information. We believe that unpublished and non-print resources will present greater challenges for these revised instructions.

Questions raised:

Using relationships

ALA reviewers found it difficult to envision how using relationships would work in practice. One possibility would be to use the issuance statement for display and the relationships for linked data. However, it is not clear how the paper embraces this concept.

Display and granularity

While transcribing the issuance statement certainly represents the resource, presentation of the full statement may not be the most efficient way to fulfill the FRBR user task "identify", at least not in all cases. As noted above, the shorter, clearly parsed ISBD-style allows for an

easier way for users to quickly identify and distinguish the place, name, and date subelements. Are there times when this approach would be preferred, either as an additional way of recording the data, or as an alternative? ALA recommends that any further development of the suggested changes in this paper include a discussion of display considerations.

Core element designations

The paper suggests that the transcribed PPDM statements would remain core in RDA; however, relationships are not currently core. If the JSC agrees to pursue this work, the status of core instructions in the various relationship chapters needs to be revisited.

Indeed, ALA believes that if either Scenario A or B is implemented in RDA, the primary mechanism for recording PPDM information should be via relationships, rather than transcription. While certain descriptions would still benefit from transcription, such as those for early printed resources, the transcribed information could be recorded in parallel with the relationships. Thus we question the stated core element status for 2.8 (Scenario A) or 2.7 (Scenario B).

If Scenario A is developed, the JSC will have to decide the core element status of the distribution and manufacture statements. We note that under Scenario B, if the Issuance Statement is core, cataloguers will have to transcribe all PPDM information, not just the information related to publication, as in RDA currently.

Issuance information from multiple sources

It is unclear how a cataloger would treat simplified PPDM transcriptions if the information comes from multiple sources. While we support having instructions for a hierarchy of preferred sources for issuance information, we note that it is common for a portion of an imprint statement to appear on the recto of the title page, with the remainder on the verso. It is also somewhat common for early resources to have contradictory or earlier/later statements between title page and cover (as in re-issues; cf. RDA 2.2.3.2). Similar issues arise in relation to non-print resources, such as compact discs and DVDs. Specific instructions will be needed to provide appropriate guidance for these situations. We believe this guidance will be more critical, and more complex, under Scenario B.

Developing the Event element and event modeling

While ALA supports developing the Event element, we note that FRBR defines this element only as the subject of a work, while the usage envisioned through this paper indicates a much broader application. It will be important to work with the FRBR Review Group on this issue.

If the event-modeling approach is adopted, it has the potential for application beyond the aspects discussed in this paper.

Modeling Place and Date

As noted in the paper, modeling Place and Date outside of the subject relationship is not currently supported by FRBR. We are not convinced that developing these existing relationships is the right approach.

In addition, we do not believe that relationships between manifestations and place or timespan belong in Chapter 23, which relates the current FRBR Group 3 entities to works only. These relationships are more like those in Chapter 21, although that chapter only addresses the relationships between FRBR Group 1 and Group 2 entities. As with the issues surrounding the event element, the JSC will need to consult with the FRBR Review Group to develop the model to support these relationships.

Issues surrounding the inclusion of copyright date:

ALA has some reservations about modeling copyright date as part of the suggested "Date of Manifestation" element. We do not believe that the proposed scope statement ("Date of manifestation is a date or range of dates associated with the production, publication, distribution, or manufacture of a resource") encompasses copyright dates, which are "associated with a claim of protection under copyright or a similar regime" (RDA 2.11.1.1). Although a copyright date appears on a manifestation, and thus is appropriate to record as identifying information in a description, the relationship is between the copyright date and the work or expression.

Additional elements needed

Many of the notes recorded for PPDM elements currently concern facts instead of the statement as it appears in the source (e.g., "Actually published in Dublin" or "Ceased publication in 1999"). Such notes can help clarify why the transcribed statement and the corresponding recorded elements differ. However, these two examples more properly concern the proposed related Place and Timespan entities, not the transcribed statement transcribed. Therefore, ALA recommends developing the appropriate "Details on ..." elements to those entities to accommodate such notes.

Answers to questions:

1. *Is there a preference for Scenario A, Scenario B, or neither?*

ALA respondents were divided on this question. If the JSC pursues these changes, many in ALA would prefer the granularity offered in Scenario A. Those in the rare book community are especially in favor of Scenario B, although they consider Scenario A to have many of the same benefits.

- 2. Is there a preference for further work on the entities option (place and timespan), the attributes option (Date of Manifestation, Place Associated with Manifestation, etc.), or neither?
 - ALA agrees that RDA would benefit from further work in this area. We have a preference for the entity approach.
- 3. Should Production be treated the same way as Publication, Distribution, and Manufacture, or is it different, as argued in 6JSC/ALA/Discussion/4?
 - ALA sees some significant differences, as described in 6JSC/ALA/Discussion/4. However, the answer really depends on the details of the proposed treatment.
- 4. Should the approach to simplification of PPDM statements be applied to Edition Statement and Series Statement?
 - ALA respondents were divided on this issue. However, we note that the same simplification arguments could also be applied to Title and Statement of Responsibility.
- 5. *Is it appropriate to define element sub-types as is proposed in Date of Manifestation when the instructions are the same for each sub-type?*
 - Yes. Most ALA respondents also believe that supplying separate instructions, even if they are largely duplicated, is the best approach. Many found the instructions in Appendix C difficult to follow, due to the "short-cut" approach of providing the instructions only once.
- 6. In relation to the term "issuance statement"
 - a. Is issuance an acceptable term, given that unpublished and found objects are in scope?
 - ALA believes this is not an ideal term. If production information is not included in this category, then "imprint" could be an acceptable substitute.
 - b. Should the term "statement" continue to be used in RDA if there is no clear link to ISBD?
 - It would probably be better to find an alternate term.