

To: Joint Steering Committee for Development of RDA
From: Kathy Glennan, ALA Representative to the JSC
Subject: Revision of Appendix D regarding capitalization practice

ALA thanks CCC for the proposed revisions to address ISBD capitalization practice. While we sympathize with the English-centric problems associated with Appendix A, we do not support the proposal to add capitalization practice conventions to Appendix D, for the following reasons:

1. Given that the JSC is discussing the usefulness of retaining Appendix D, we believe that it is inadvisable to make changes to that appendix until the outcome of that discussion is determined.
2. Although Appendix A is English-centric, we believe that this is the appropriate place for instructions about capitalization. The ISBD capitalization practice could just be an application decision.
3. We do not believe that the proposed language from ISBD A.7, to address capitalization of the first element in an area, offers enough clarity. We find the sentence "... some elements or parts of elements ..." inadequately specific to implement.

We support investigation of what would be entailed in restructuring Appendix A to address the current English language bias.