

To: Joint Steering Committee for Development of RDA

From: Bill Leonard, CCC representative

**Subject: Larger place – Revision of RDA 16.2.2.4 (Recording the Preferred Name);
16.2.2; 16.2.2.9.1; 16.2.2.10; 16.2.2.10.1; 16.2.2.11; 16.2.2.11.1; 16.2.2.12;
16.2.2.13; 16.2.2.14**

CCC thanks DNB for prompting an interesting discussion on recording place names which touches on the proposals in Change 2 in [6JSC/BL/10](#). Some of the points raised in response to that paper have bearing on the issues raised here. We agree with the assessment that this paper has attempted to cover two issues: the use of codes for place names and treating larger place names as separate elements.

As a local system implementation issue, the techniques used to encode data are outside the scope of the content standard RDA. A user community could decide to store place names using a system of codes, but this would be a decision expressed in their local policy statements. Decisions of this nature are also subject to the standard practices of shared or union catalogues an agency contributes to. Elaborating this decision in their local application profile will communicate this practice to their information exchange partners. Some exchange partners may expect the codes to be transformed into text before any data is exchanged. We acknowledge that the third paragraph of 0.12 could be subject to various interpretations. Perhaps DNB would consider drafting more explicit text to satisfy their vocabulary encoding intentions. Consideration could also be given to a general statement in chapter 16 referencing external lists.

The discussion of the larger place should wait until there has been an examination and discussion of the various ways that larger places could be treated. The changes proposed by DNB at this time could all be for naught if, in future discussions, JSC decides to treat each place name as an entity employing whole-part relationship types. Other broad issues to be considered when place names are addressed, e.g., what constitutes the preferred name for a place (does it include additions?); the distinction between the preferred name for a place and its authorized access point could be made clearer;

CCC is empathetic with DNB and the German and Austrian cataloguing community as it confronts the challenges of working with name headings in languages other than English, in a cataloguing environment dominated by English-language practices. We sincerely look forward to future discussion of these issues but regret that we cannot support this proposal.