To: Joint Steering Committee for Development of RDA

From: Marg Stewart, CCC representative

Subject: Chapters 12-16, 23, 33-37 (Group 3 entities and "subject")

CCC thanks LC for preparing this discussion paper which surfaces the challenges of addressing subject access in RDA.

General comments:

CCC cautions that before embarking on identifying content for the "placeholder" chapters, their scope needs to be clearly defined and clarified. For example, is the scope restricted to subject headings or is it subject systems in general (including classification)? Another concern raised was the need to ensure that we resist introducing an Anglo-bias by our overfamiliarity with LCSH, CSH and its derivative RVM. Furthermore, while FRSAD declared the FRBR group 3 entities to be insufficiently general to be recommended in a general model of subject entities, they could, however, be viewed as helpful in modeling a specific subject system. For example, they are relevant when considering LCSH and its derivative subject heading schemes but totally unhelpful in understanding classification as a subject system. Our goal is internationalization but in the area of subject systems, there is a great deal of variety.

CCC supports the concern expressed in the BL rep response that some of the suggestions would result in fundamental changes to the FRBR model.

The suggestion is made at the top of page 2 that "For RDA, we could continue to declare those as entities, as FRBR and FRAD did. We could then go back to FRBR and the attributes and relationships (none were added to FRAD or FRSAD) for these entities and proceed." When the discussion paper was submitted in May 2011, LC would not have been aware of the FRBR Review Group's view of the group 3 entities as discussed at its IFLA meeting in August. As the FRBR Review Group embarks on the consolidation of the FR models, the current thinking is to retain the four group 3 entities as one view of the possible subtypes of Thema (i.e., whatever can be the subject of the work). However, these entities will be deprecated and not developed further. Consequently, CCC notes that no effort should be expended in reporting back to the FRBR Review Group with attributes and relationships for these entities.

Finally, CCC suggests that it may be premature to begin this discussion before the FRBR Review Group has proposed a consolidation of the models and before JSC has fully considered the ramifications of this consolidation.

Specific comments:

Suggested Process for Adding Content to RDA

a. Add definitions for these additional entities (Concept, Object, and Event) following FRBR (FRAD said they were to be added following FRSAD, but FRSAD bypassed declaring these as entities; this task may be addressed by the FRBR Review Group when bringing together the "family of FRBR" models).

CCC response: As noted above, CCC feels that the first step should be a clear statement of what RDA is trying to model and agreement on the scope of the chapters.

b. Add Attributes and Relationships at a general level for each of the new entities (FRSAD offers some attributes and relationships for *Thema* and *Nomen* as shown in the attached addendum, and I suggest that RDA should try to incorporate those as much as possible).

CCC response: This step is dependent on a) above.

c. Add "Constructing Authorized Access Points" for manifestations and items, but leave access points for concepts to subject systems. For items, recognize manuscripts as objects (as opposed to the works contained in the manuscripts) that need to be named as the subject of other works.

CCC response: Agree with BL rep comments.

d. Follow the instructions now given for the attributes and construction of access points for conferences, etc., and move them to events; remove the instructions treating conferences, etc. as corporate bodies.

CCC response: Disagree – agree with BL rep comment that if conferences are moved to the "event entity" they could no longer be used in naming a work.

e. Continue discussions about Items/Objects and Events/Expressions and Subjects of expressions to see if there is consensus on a direction for those to share with the FRBR Review Group.

CCC response: CCC is not clear on the intent of this point. Events should not be tied to expressions solely because the recording of a performance (which can be viewed as an event) will give rise to a new expression of a work. Most events will not have this kind of special relation to expressions, and most expressions can only tenuously be related to events.

f. LC will provide completed chapters following the model shown here for Related concepts; if there is JSC agreement; a discussion during the June conference call could provide guidance to LC for preparation of chapters before the August 11 deadline for submission of proposals.

CCC response: CCC reiterates that is not clear what we are trying to model.

General issues to be discussed (see other areas of this paper for more information for specific issues noted in the sections for the entities)

1. Do we wish to declare for RDA that subjects exist only at the *work* level or may we allow subjects of *expressions*? FRBR describes them only at the *work* level, but does not prohibit any others. If we want to enable declaring relationships between works/expressions/manifestations/items with some of the Group 3 entities (especially Place) that are not "subject" relationships, we would <u>not</u> want to restrict the Group 3 entities to only subject relationships with *works*.

CCC response: CCC feels that subjects in RDA should exist only at the work level as specified in FRBR and FRSAD. CCC agrees with the BL rep comments.

2. Should *object* be expanded to include item and perhaps not require *the work/expression/manifestation* entities in inherent relationships to such *objects/items*?

CCC response: No, CCC disagrees with expanding object to include item. This would be a fundamental and undesirable change to the FRBR model.

3. Should we consider *events* as *expressions*, if we already consider performances as expressions? This may prove useful, for example, to connect the identifying characteristics of a performance (an *expression*) with specific Group 3 entities.

CCC response: No, as indicated at e) above.

4. Do we want to include *time* as an entity?

CCC response: Following clarification of what we are trying to cover, CCC believes that there is merit to considering time as an entity. If we are attempting to model the different types of LCSH subject headings, then yes, including time as an entity would be appropriate.

5. There will be an impact on chapters 18/19-22, 24/25, 29, and Appendices I, J, and K that will need reworking to provide for subject relationships (and/or add another appendix for subject relationship designators) and possibly their instructions on "Source."

CCC response: Appendix L (Relationship Designators: Relationships Between Concepts, Objects, Events, and Places) is already reserved for relationship designators relating to relationships among group 3 entities.

6. Source will also need to be examined for chapters 2, 3, 6, 9, 10, and 11 for the Group 1 and Group 2 entities when used as subjects.

CCC response: CCC is not sure why subject usage of group 1 and 2 entities would change their sources. Reference sources are already on the list of sources to be used to establish a name when no chief sources of information on resources emanating from the group 2 entity, or embodying the group 1 entity, exist.

7.-9. CCC response: Noted.

10. We need to return to "Constructing access points" for manifestations and items, so that they may be used as subjects. This could be viewed as an "opportunity" to split the very long Chapter 6 into smaller chapters for the separate entities (work, expression, manifestation, item). Such changes should be done soon, especially if re-numbering is involved, before major ancillary documentation is written.

CCC response: Please see our previous comments

11. We should consider adding *Time*, as that is often controlled in library environments (for example \$y Chronological subdivisions in the 6XX (subject) fields of the MARC 21 format, as used in Library of Congress Subject headings (LCSH)). Further points on this complex issue are described under the section in this document on Time.

CCC response: Please see our previous comments.

12. We need to review the impact of work needed for appendix K – mentioned under Related Concept below.

CCC response: Noted.

13. We need to add information to appendix J descriptive relationships that can also be considered subject relationships and add content or a placeholder in appendix K for relationships between *concept* and *concept*.

CCC response: At its meeting on August 19, 2011, the FRBR Review Group affirmed that the descriptive relationship defined in FRAD is a specialization of the general subject relationship which appears in both FRBR and FRSAD. This would have some impact on Appendix J.

14.-15. CCC response: Noted.

II. Possible Content for the "Identifying" Chapters

CCC feels that is premature to comment on possible content for the "identifying" chapters prior to consideration of the issues and comments raised above.