**To:** Joint Steering Committee for Development of RDA

From: Kathy Glennan, ALA Representative

**Subject:** Meta-metadata elements in RDA

ALA thanks the JSC Technical Working Group for their analysis of meta-metadata elements in RDA. We commend the Working Group for their efforts to address clean, consistent data modeling in RDA and for educating us on the relevant data modeling dynamics. We generally support the proposal, although we have some comments on Recommendation 1.

**Recommendation 1:** Use the Glossary definitions of *Cataloguer's Note*, *Source Consulted*, and *Status of Identification* in the RDA instructions in the preferred style. Add text to specify the variations for each instruction, if necessary for clarification.

While ALA understands the reasons behind recommending a single definition for each occurrence of these three meta-metadata elements, this works better in the RDA Registry than in the RDA instructions. If this recommendation is implemented, we are concerned about the resulting confusion for cataloguers. For example, instructions encompassing "relationships between entities" are inappropriate for instructions in Chapters 5 and 8, and instructions for "determining the name, title, or other identifying attributes of an entity" are out of scope for Chapters 24 and 29. ALA does not agree with the stated assumption that catalogers will understand the specific application of the meta-metadata element based on the context of the instructions. We note that the recommendation suggests the possibility of adding text to specify the variations for each instruction, although the proposed changes do not reflect this. We strongly believe that this additional guidance is needed. If others share this concern, the JSC will need to decide how to undertake this additional task.

Alternative approaches to this problem would be to create separate meta-metadata elements (e.g., Cataloguer's Note on Work or Expression); or to break out these general instructions into an entirely different section of RDA, having them appear just once.

In relation to the proposed generalized definition of "Cataloguer's Note", we believe that the scope has changed for Chapters 5 and 8, since the concept of "using or revising the authorized access point" would be deleted. We recognize that the proposed definition was taken directly from the Glossary; however, we recommend revising the scope and Glossary definitions to reinstate this concept:

## **5.9.1.1** & **8.13.1.1**, clean copy:

A cataloguer's note is an annotation that might be helpful to those creating, using, or revising the authorized access point representing an entity; or using or revising the relationship data.

**Recommendation 2:** Refer the development of general models for provenance and other metametadata to the JSC Technical Working Group for monitoring and application to RDA in due course.

Agree. ALA commenters identified this proposal as a dense work of analysis and appreciate the JSC Technical Working Group's willingness to further explore these issues.

**Recommendation 3:** Refer the development of RDA models for authority data to the JSC Technical Working Group for action in 2015.

Agree.

**Recommendation 4:** Add Cataloguer's Note, Source Consulted, and Status of Identification to the RDA Registry with no semantic association with other RDA elements; that is, with no domain or range.

Agree.

**Recommendation 5:** Deprecate the domains of *Date of Usage*, *Scope of Usage*, and *Undifferentiated Name Indicator* in the RDA Registry.

Agree.

**Recommendation 6:** Consideration should be given to placing RDA meta-elements in a separate Registry element set, or in the unconstrained element set.

Agree.