

PCC Review and Comments on the drafting of AACR3

Background

PCC comments on drafts of AACR3 are communicated through representation on the Committee on Cataloging: Description & Access (CC:DA). CC:DA is charged with reviewing and developing positions on proposals to rule revisions within ALA and in consultation with other organizations. The comments that CC:DA gathers from constituents such as PCC are communicated to the Joint Steering Committee for the Revision of AACR (JSC). The PCC leadership is grateful to CC:DA and the JSC for providing an avenue to comment on the drafts of AACR3.

The draft of AACR3 part 1 was made available to CC:DA in mid-December 2004 and the deadline for PCC comments was February 11, 2005. The PCC liaison to CC:DA, Paul Weiss (University of California, San Diego), gathered comments from members of the PCC Standing Committee on Standards (SCS). Kristin Lindlan (University of Washington), a CONSER representative and member of CC:DA documented the comments from CONSER. Carolyn Sturtevant, BIBCO Coordinator, compiled comments from BIBCO members.

Paul Weiss compiled and edited the comments of CONSER, BIBCO, and the SCS into a single document on behalf of the PCC and submitted it to CC:DA. Comments from CONSER that did not appear in the edited document were submitted to CC:DA separately with the approval of the chair of CC:DA. The PCC comments document compiled by Paul Weiss, Feb. 11, 2005, follows this page and the URL for the full CONSER document appears below.

[PCC comments compiled by Paul Weiss.](#)

CONSER comments compiled by Kristin Lindlan, Feb. 9, 2005. URL:
<http://www.loc.gov/acq/conser/AACR3-part1CONSER.pdf>

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Other resources

CC:DA Web site:

<http://www.libraries.psu.edu/tas/jca/ccda/>

JSC Web site

<http://www.collectionscanada.ca/jsc/current.html>

PCC comments AACR3 Part I, 041217 draft

Process

JSC's Statement of Policy and Procedures states that proposals for rule revisions are "submitted through a JSC constituent body" or "from outside the constituent bodies." There is not a provision for JSC itself to initiate rule revisions. The members of COP should not have made the decision to move forward with the development of a new edition of AACR without broad consultation with others at their organizations.

One reason given for the rushed, closed process is the need to generate income to fund JSC work. We are not convinced that the current path of development of AACR3 will generate the income that COP seems to expect. We feel that many fewer institutions will spend money on a new code that does not contribute to improved cataloging processes nor to improved descriptions for our users. It would seem that a market analysis would be in order.

The decision about the scope of the new edition should not have come top-down, but rather via dialogs with affected communities, as most of JSC's work has happened before.

The lack of communication with constituencies alone has created and continues to affect the public reputation of AACR. As that reputation suffers, so will sales.

The chronology for reviewing the Part I draft is insufficient, especially given that it was initially distributed before the end-of-the-year holidays, which meant that many did not get the draft until after the new year.

The limited distribution of the draft is inappropriate. Changes on this scale have large consequences; only by cultivating an open environment of sharing of ideas can the final document achieve its full potential. The culture of secrecy created by COP/JSC foments distrust, anger, and disillusionment in the (theoretically) cooperative nature of the process.

JSC and ALA as a Co-Publisher communicate significantly with the American cataloging community. However, COP does not. There has been confusion about which decisions have been COP's and which were JSC's. ALA's representative to COP needs to communicate more, and, as an agent of the membership of ALA, needs to carry the will of ALA to COP, not the other way around.

It is absurd to draft the specifics of the rules before fleshing out the principles that cover those rules (to appear in the General Introduction). The cataloging communities need to come to agreement on principles, and on how to balance competing principles, before evaluating the rules themselves. If it turns out that the community does not agree with some principles that are carried out in the current draft, much writing and commenting time will have been quite wasted.

For example, guidelines on when two resources are considered equivalent (and covered in one description) and when they are considered distinct (covered by separate descriptions) need to be provided, in particular for resources issued in successive parts. It is unfortunate that JSC passed up the opportunity that CC:DA offered it to include in AACR what has become the document "Differences Between, Changes Within". Catalogers have to make this decision every time s/he catalogs and, with any continuing resource or multipart monograph that undergoes change, s/he needs to determine whether a new record is needed or the existing one modified.

Whether to catalog material as ancillary or as a separate resource needs to be covered in the General Introduction. The rules related to this (A1.7B9.d, A1.7B14, 1.9, C7.7B14, etc.) need to be

supported by a conceptual framework, and then reworked, as they are confusing, contradictory, and not well structured.

The date of creation of a work is not well-addressed in Part I. This data is important for many types of materials, especially for performances and movies, which are often republished over many years. This could be addressed either in Part I (following AMIM2's lead, by optionally recording it after the date of publication, distribution, etc.) or in Parts II or III. But it needs to go somewhere.

How to handle parallel titles, other title information, and statements of responsibility that apply to part, but not all, of the title proper (A1.1D4, A1.1E5, and A1.1F7) is another issue that needs to be addressed holistically. We need to be able to clearly identify (for the cataloger herself, and for other staff viewing the record), encode, and display the complex relationships among these elements; use that designation to index, retrieve, and display the title proper and various desired combinations of title elements; and base relevant uniform titles on that title proper for needed added or linking entries. Not an easy task for these ant's nest situations! Many possibilities present themselves: relegate otherwise-intervening other title information, etc., to a note, utilize uniform titles for full title proper identification and indexing, etc. But again, the optimum solution will only come from looking at our options across the Parts.

It is also unwise to work on the three Parts as distinct entities. AACR needs to be a cohesive document. Decisions made during work on Parts II or III may have significant impact on Parts I or II. For example, standardizing names of publishers or languages needs to be considered. Which means authority control. Which means that Part I can't be fully formed until work on authority control progresses. Another example is the principle of Relationships, which are now handled throughout the rules. The handling of series also needs a holistic review. Preferring the chief source for series title in AACR3 rather than the series title page as in AACR2 will have an impact on the authority control of that series, as the forms of title in those two places sometimes differ. We need to consider not recording some relationships in the description, such as translation, but can only do that in a holistic context.

If JSC is setting up a group to redraft rules for technical description, why was a redrafting included in this document? That seems to be wasteful of time and effort.

Given that the Part I Introduction has much new content, it is of concern that JSC was not explicitly seeking feedback on it in the template.

Very recently the serials cataloging community devoted substantial time and effort to create two new concepts for categories of material--continuing resources and integrating resources--and other related improvements to the rules. It was a momentous achievement to provide both a more solid theoretical framework for chapter 12 and beyond, and also a significant pragmatic improvement in the usability of the rules and the descriptions they create. Regardless of whether one thinks that discarding the concept is worthwhile or not, for JSC to blindsides this community by removing those concepts from the rules without consultation with the affected community is disrespectful and counterproductive. It is quite understandable that some serials catalogers, especially those who worked quite hard on the chapter 12 revision, may feel betrayed. The loss of trust that this situation has engendered will be difficult for JSC to repair, which will take several years.

Considering all of the above together, it appears that JSC is moving away from its history of using consultative processes toward more oligarchical ones.

AACR3 as a whole

Without the General Introduction, it is actually not clear what kind of standard AACR3 is trying to be. It seems to at least be a content standard. But is it also a display standard? A standard for indexing catalogs? If it is just a content standard, why does it dictate the order of areas, elements, and sub-elements? As an example of why these questions are important, A1.8B1 calls for preceding a standard number with "ISBN" or "ISSN" (which we don't in practice do). This is an encoding scheme issue, not a content issue, as is:

the "In:" for "In" analytics in A1.10A,

the supplied descriptive term as other title information for a title that is a name of a corporate body in A2.1E1c, and

the supplied word "trailer" in B7.1E6.

Embedding encoding in data restricts the usability of that data. If AACR is a display standard, those can be viewed (and treated) as display labels, analogous to prescribed punctuation.

If AACR3 is to be a display standard, then examples as displayed in online systems would be more useful than card-catalog oriented displays.

A1.1G2 would have us display multiple titles strung together in a very difficult-to-follow paragraph. Users would likely be far better served by an approach where each title is given its own line (that is, repeated area 1s). Since some elements relate to more than one work, the list could be headed by some generic phrase. For example (without GMDs):

This resource consists of multiple titles. They are:

Haydn

"Clock" symphony : (no. 101)

"Surprise" symphony : (no. 94)

This resource consists of multiple titles. They are:

by Charles Dickens ; with seven illustrations by F. Walker and Maurice Greiffenhagen

Hard times

Hunted down

Holiday romance

George Silverman's explanation

This resource consists of multiple titles. They are:

Saudades do Brasil : suite de danses pour orchestre / Darius Milhaud

Symphonie concertante pour trompette et orchestre / Henry Barraud

Weiss/PCC 2/11/05

In the introductory matter presenting the draft to the constituencies, JSC states that AACR3 "is being designed with a view to compatibility with other standards for resource description and retrieval and for use worldwide both by libraries and by other information agencies." The AACR strategic plan states that a goal for AACR is that its rules "will be used beyond the library community." It is of great concern that JSC feels the current draft is an advancement of that goal.

To our knowledge, even communities close to ours (such as those who work with archives, rare materials, image collections, museums, and sound archives) were not contacted by COP/JSC to find out whether those communities were even *interested* in using an AACR3.

COP/JSC appears to not be at all knowledgeable about rules in these other communities. Many of the standards in these other communities are set up very differently from AACR, and produce records that are very different from ours, governed by principles which diverge (sometimes significantly) from ours.

The likely alienation of other communities from COP/JSC's assumption that they should use our rules could severely negatively impact one of PCC's goals: Promote cross-sectoral discussions and partnerships (e.g., archivists, libraries, educational museums, other information providers) to promote development and use of metadata content standards.

That goal is not listed per se in the list of objectives and principles. Either put it in (and do lots of outreach _before_ writing rules) or let it go.

A transition table giving the AACR2 rule number and its AACR3 counterpart would be quite helpful.

We are glad to see that the examples will be thoroughly reviewed. Many communities feel that examples for their type of material are underrepresented.

More examples of relevant parts of resources be provided, and that those be images of actual sources of information for at least more complicated situations; the CONSER Cataloging Manual can serve as an excellent role model.

Principles need to be developed to guide the extent of examples:

- only the piece of the description affected by the rule?
- the whole element up to the one being illustrated?
- the whole element?
- the whole area?
- the whole description?

1. Objectives and principles

It is an important step forward to begin to explicitly describe the objectives and supporting principles that guide the rules and the descriptions arising from the application of the rules. This will provide an opportunity for catalogers to understand not only how to apply the rules, but also why the rules are as they are. This will help to alleviate a common concern for those constituencies who have found AACR2 difficult to apply, as well as for new catalogers and their trainers.

Overall, the overall scope, content, and structure of AACR3 is positive.

General comments on the formulation or application of the objectives and principles established for part I:

A. Scope, structure, terminology, etc.

The introduction needs to be restructured. Much of its text is not an introduction, but rather actual rules, which should be labeled and numbered as such. We need to make it clear that this information is to be followed, not merely available as background. Also, catalogers refer to this information often and it is helpful to be able to cite a rule number, especially when training new staff.

Objectives:

Comprehensiveness

Consistency

The reorganization of Part I from type of material to type of metadata has (inherently) improved consistency, as the number of rules for any one type of metadata are reduced.

All options need to be readily identifiable and, in the electronic version, retrievable. This is important for managers, principal catalogers, and trainers. It far from the case now, with options using several different phrases.

Clarity

The phrase "language and script suggested by the resource being described" is not clear. Perhaps the provision of an example would be sufficient.

A1.0A1: The wording "focus for the description" is somewhat obscure and could use further clarification.

It would clearer to combine the third and last paragraphs of A1.6A3, and to refer to specific rules.

The two paragraphs in A1.6B2 seem to give contradictory instructions for the same situation.

It is unclear how to treat acronyms in A1.6D1.

A1.6H4: The wording would be clearer if "second" were changed to "separate" in both instances.

A1.6K: The meaning of the second paragraph is not clear.

It would be much clearer at A1.7B5 for the caption to be "Other forms of the title proper and other titles". Each case could be covered by separate sentences.

The first sentence of A2.1F16 would be clearer and more accurate as: "If a responsible person or body is added or deleted ...". As written, the sentence refers to adding a person or body already recorded.

It is not clear why manuscripts are dealt with in both B and C. Does AACR3 believe manuscripts to be a type of content or a type of media?

The latest version of AACR2 changed the spacing after an open hyphen from three spaces to one. In the proposed rules, however, the gap has reverted to three spaces, as found in rules A1.3F1, A1.3G1, A2.7B5.1, A2.7B7.1, and A2.7B8.2. Is this intentional?

Rationality

The introductory matter presenting the draft to the constituencies states that: "The revisions being undertaken will entail ... a logical 'deconstruction' of many of the concepts that underlie the current structure and formulation of the rules." We agree that this is important, but since rationales are generally not given within the rules themselves and since the General Introduction has not yet been written, there is little evidence upon which we can make a determination of rationality.

FRBR has brought a new, more rigorous way of looking at the purpose and structure of what we do. It would be beneficial to more fully embrace FRBR concepts, terminology, relationships, and even its structure.

The high overlap between A2 and A3 makes the decision to discard the concept of "continuing resources" bewildering.

There need to be principles governing which instructions should be optional. In particular, the degree of optionality for the GMD and the technical description may reduce the effectiveness of sharing records. Recording the number of physical units for a single-volume book but not the number of components (in other words, "1 v.") inhibits the FRBR identify and select function.

We are continually reminded not to catalog from example. The text accompanying the third example of A1.4F7 implies the force of a rule. These kind of things need to be eliminated from AACR3. There seems to be no justification for restricting the use of this pattern to dates fewer than 20 years apart.

It is not clear what the perceived benefit is for using the numbering area for multipart monographs.

The fourth and sixth paragraphs of A1.4A3 would have catalogers using respectively the colon even when no place is recorded, and the comma even when no publisher is recorded, neither of which seem rational.

A1.0D: The concept and requirements of this rule need reworking. The rule is very strongly geared to the card environment and to tangible resources. Consideration should be given to various sets of requirements for different purposes, such as LC's emerging access-level record for remote electronic resources. The level of the description should be explicitly stated in descriptions. Given that the first level includes requirements that depend on decisions made in Parts II-III, we can not fully evaluate that level.

Currency

Other than the GMD, AACR3 better deals with resources that are of multiple types (digital cartographic serials, etc.).

Compatibility

This objective as stated is too ambiguous, meaning different things to different readers. It is of course not feasible, appropriate, or even desirable for AACR3 to be compatible with all relevant "internationally established principles, models, and standards." It is important to decide which standards or types of standards AACR3 should be compatible with.

It seems time for AACR3 to cut loose from the shackles of the ISBDs, which retain many anachronistic characteristics such as delimiting punctuation (something metadata creators outside the library environment are highly unlikely to follow); a linear, card-based bias; and focus on the needs of national libraries. Or, COP/JSC needs to generate within IFLA a movement to modernize the ISBDs.

At the same time, AACR3 takes us in a direction away from rather than toward compatibility with ISSN cataloging policies. After a major effort in the serials community to align AACR and ISSN rules, dropping the concept seems to indicate a lack of interest in international compatibility. For example, A2.0A1 no longer treats "resources that exhibit characteristics of serials but whose duration is limited" as serials. This unfortunate step backward would mean that utilizing ISSN records becomes much more burdensome. If JSC wants to make changes to the serials cataloging rules, an attempt should be made to work on this jointly with the International ISSN Center.

The rushing ahead on AACR3 sends an unfortunate message to those involved in IFLA's International Meeting of Experts on an International Cataloguing Code. If we truly want to play well with our international colleagues, we should wait until the efforts of IME ICC have produced a document that can guide the development of the various cataloging codes, or even a document that *is* a cataloging code.

AACR3 needs to be able to "play well with others." As most modern information standards, it should refer out to other standards instead of either pretending to be an island unto itself, or reinventing many wheels.

The distinct lack of compatibility with content standards used in other communities leads to significant levels of intellectual effort which are required to reuse data from those communities.

Because of the idiosyncratic nature of AACR compared to other standards, PCC is hindered in its work on its Objective 1.3.3: Create and distribute a brochure encouraging and offering assistance to information providers who offer useable cataloging records that correspond to the information resources they sell.

Is this draft of AACR3 compatible with IFLA's *Guidelines for OPAC Displays*?

Adaptability

This objective needs to be clarified. What is meant by "user communities"?
different demographic groups of end users?

AAC6R3 records do not meet known needs for children users.

different types of libraries/information collections?

AACR3 likely does not meet the needs of the museum, archives, etc., communities.
countries beyond those directly represented on JSC?

There is still an English bias in the rules.

In general the language of the text seems filled with library jargon and is only comprehensible to those already familiar with AACR2. We do not see it easily being used by other communities, despite the fact that that is one of the stated objectives.

Ease and efficiency of use

With the transfer of many rules into A1, the process of cataloging (in particular for catalogers who work with only one type of resource) may be slowed down, because there are now many more "general" rules to wade through that don't apply to the type of resource one is cataloging. We hope that the electronic version of AACR3 will utilize technology that obviates this problem. For example, A1.3 and A1.5 are quite unwieldy; the truly general pieces should stay in A1, but the rest should be moved to subsequent chapters.

The proposed structure makes much more explicit which attributes are related to content and which are related to medium. This will help catalogers be more rigorous in their approach to varying types of material, especially multitype resources.

It will take current catalogers a while to get up to speed with the new structure.

Rules about one particular aspect of a resource need to be treated in a more logical, unified manner, which would support both the efficient construction of and the effective display and use of records. This could streamline and focus the intellectual effort expended by a cataloger in analyzing and synthesizing information relevant to a particular element. For example, a cataloger (and the resulting description) would benefit from addressing:

title proper, alternative title, parallel title, other title information;
sources of those elements, other notes related to title data; and
title added entries

as a single coherent set of data. This follows the lead of the CONSER Cataloging Manual, as well as many XML-based standards.

There are places in the draft where an instruction seems to apply to only some types of material, without stating that, such as at A1.5C.

One thing that is missing thus far is the conceptual framework for the rules, such as a description of the FRBR model. This may indeed show up in the General Introduction, but as that has yet to

be written and therefore we have not seen the intellectual scaffolding for AACR3, we cannot fully evaluate the ease of use of the rules.

Of course we are unable to evaluate how easy an electronic version of AACR3 might be to use, as we only have the print version to review. We hope that the electronic version will be customizable so that a cataloger can select the type of material s/he is working on (such as textual serial, monographs sound recording, or integrating cartographic resource), and only see rules relevant to that material.

Format

Of course we are unable to evaluate how amenable AACR3 might be to presentation in a sophisticated electronic version, as that version has not yet been developed.

new objective: Worthwhileness

JSC's Statement of Policy and Procedures states that "any decision to proceed with a proposal for revision must be based on careful consideration of the real value and need for the change." Making a new edition worth the AACR cataloging community's time and effort should be another principle governing AACR3.

The draft does not meet that goal. We need a next-generation, forward-looking standard. We don't need simply a new edition of AACR.

This revision simultaneously does too much and too little. Any significant restructuring of the rules requires a massive retooling effort by those who have developed training materials based on the current AACR2. This could be worth the time and effort, if the reorganization were accompanied by significant changes in cataloging practice--e.g. a close look at the use and practicality of all data currently in a catalog record; an ability to create expression-level records, which could codify the single-record practice already in use by many libraries; rethinking card-centric punctuation. However, this document does not do that.

Catalogers would need to learn the new structure, new rule numbers, new terminology, etc., without any significant new and helpful concepts or positive changes to descriptions. This would likely lead to a morale problem, which could lead to a rash of early retirements. That may sound amusing, but many of us are already having trouble recruiting catalogers.

Many other documents are organized by AACR rule number; they will all need to be reworked, just to accommodate the new structure. For an example in just one program, PCC's CONSER program will need to perform a detailed review and revision to several documents:

- CONSER Cataloging Manual
- CONSER Editing Guide
- Serials Cataloging Cooperative Training Program trainer and trainee manuals
 - Basic Serials
 - Advanced Serials
 - Electronic Serials
 - Integrating Resources
 - Serial Holdings

If COP/JSC continue AACR3 along its current path, AACR3 simply will not be worth our while. These rules are primarily a rearrangement of the rules in AACR2, which, while laudable, does not capitalize on the opportunity to improve both the use of catalog records and the process of record creation and maintenance. The library community at large--users, cataloging practitioners, other library staff, as well as library managers--can ill afford another round of retraining for little

benefit. I received one comment likening the current draft to the story of the emperor and his "new clothes," which I do not think is far off base. AACR3 will become an even bigger laughing-stock in the broader information community. As Chair of the Program for Cooperative Cataloging's Standing Committee on Standards, I feel that I will need to recommend to PCC to look for or develop alternate metadata standards to govern its records.

Because we feel that the current draft is so unacceptable, our comments emphasize big-picture issues. Comments on specific rules are exemplary, but not exhaustive.

new objective: Modernness

There needs to be an objective about capitalizing on the current understanding of and experience with metadata, user needs, and technology. JSC's strategic plan for AACR states that a goal of AACR is that its rules "will be applicable to, and operate in, an online, Web-based environment. JSC's Statement of Policy and Procedures states that "JSC takes into account technological developments and their future capabilities when considering proposed changes." To remain viable in today's information environment, AACR3 need to be revised to keep current with the effects and functionality of technology, while continuing to be usable in a print environment, as well as with expectations of modern users and library staff.

The current draft does not meet this objective.

In the minds and behaviors of users and in modern information standards, the distinction between description and access points has eroded. XML-based standards generally set out a list of data elements (a data dictionary); decisions of what to do with the data in those elements is left for implementers. It is imperative that AACR3 recognize the fusion of description and access points. For example, contents information, publisher, and language have traditionally been part of the description, and not so much access points. We know that now users need to and expect to be able to search and/or limit based on these data elements.

Most standards for descriptive metadata include elements such as subject, form/genre, and what we call holdings. We don't really have a complete, standard descriptive metadata standard, or even an element list. It is time for us to have one over-arching, international content standard for bibliographic records. AACR3 is an opportunity to have one place that considers all the content in a bibliographic description, referring out to other standards as appropriate.

Advances in catalog technology have progressed dramatically since the publication of AACR2. The rules in the current draft do not take advantage of the technological developments in cataloging systems that support the cataloger in creating/maintaining a record or make the record more retrievable. Most of us are long past the book or card catalog era.

The virtually unlimited space in online catalogs frees us from restricting the length of records, data elements, and number of access points. We have the ability, for example, to provide full-text wording rather than abbreviations or codes and to make many data elements repeatable rather than subjugating additional information to notes, which are generally recorded and displayed separately from the main elements. As a couple of examples, A1.1F5 should not restrict a statement of responsibility to three names, and A1.4 should allow for multiple occurrences of the area. The latter would be especially helpful for providing the current publisher for A2 materials, rather than burying it in the notes area.

It is important to recognize (as MARC has for a long time) that no information provided for a data element does not in practice mean that the default value applies. We have the storage space to make default values explicit, such as language of text even when it is English; this could also

increase the international sharing of records. A method for differently indicating that a resource has no publisher vs. the publisher is unknown to the cataloger is needed. The chief source should always be explicitly recorded; use of varying chief sources leads to wasteful duplication of effort and not easily recognized multiple records for the same resource.

One of the most basic abilities of online systems is that they can process data in order to index and/or display it in different terms. For example, "cartographic resource : print" and "1 sheet" could be displayed simply as "map". We get the best of both worlds: user-friendliness and high flexibility in staff management of the catalog, who may need to count all cartographic resources, perform preservation on print items, or assess new shelving options based on the preponderant number of sheets per resource.

We do not need to display the same data to both catalogers and users. We should take advantage of the ability to distinguish between metadata for public consumption (descriptive metadata such as author, title, and subject) and metadata for other catalogers (administrative metadata such as identification of the chief source). This would allow us to eliminate the infelicitous practice of using square brackets. If it is decided, for example, that the key title in area 8 is for the benefit of staff and not users, it can be designated as staff-only and not displayed to the public.

In the online environment, combining data elements is not as beneficial as it was in the card environment. Data elements are most usable when we know exactly the kind of content in them. The last paragraph of A1.7A3 (and related rules) needs to be reconsidered. For example, CONSER instructs its catalogers to not combine information about earliest and latest issues or parts consulted.

Principles:

Generalization

The work of the Consistency Task Force of CC:DA has helped AACR3 better follow this principle.

A1.0F7 needs to be further generalized from "letter or word" to "string of characters" to include numbers, etc.

We see that this principle has been furthered at these rules.

A1.1B4 provides for more consistency for all forms of issuance on determining whether or not a corporate body is part of title proper.

A1.1B7 full generalizes the handling of full forms/short forms, which will improve consistency in treatment of title transcription, especially for conference publications where monograph and serial catalogers have viewed quite differently.

A.1.1B8 for section/supplement titles.

A1.5C9 is an example of perhaps being too general. Although not stated, we assume that this would not apply to types of material that are inherently image-based, such cartographic, graphic, and moving image resources. This may be better situated in Section B.

Specificity

Non-redundancy

The work of the Consistency Task Force of CC:DA has helped AACR3 better follow this principle.

Terminology

We applaud the utilization of FRBR terminology and concepts, although we wish it had been a more complete process. For example, it should be explicit in A2.5B1 that the number of physical units recorded is for the manifestation, not the item. In other words, as published/released, not as currently bound, etc.

Another example of the insular nature of the draft is that the word "metadata" is not used at all. The lack of the word is an indication of a lack of modern thinking about how AACR3 descriptive metadata fits into the broader information landscape.

Sometimes it is important to coin a phrase to designate a technical concept. When terminology exists in the common parlance, however, that should be used. We understand that ridding AACR3 of unnecessary technical jargon is being worked on, but as that work is not complete, we cannot fully evaluate AACR3 in this area.

Either the word "publication" (in its meaning as an object, not as a process) should be changed to "resource", or the difference in meaning should be made explicit.

It is unclear from context what the scope of the term "oriental" is intended to be. Does it mean East Asian? Is the Middle East included? Does "oriental nonroman script resource" include Russian?

The term "focus of the description" seems confusing and awkward-sounding. Either of the following would be better: resource being described, basis of the description.

The words "prominent" and "prominently" are not at all precise terms in standard English. With no AACR3 definition, this will lead to varying interpretations of the term. This is of concern because the term is used in significant rules such as A1.0A2, which have a big say in how a description turns out.

In most cases, the loose term "version" should be replaced with the appropriate more rigorous FRBR term, or at least "resource".

The glossary includes a definition for "facsimile reproduction," while various rules use:

- facsimile(s) and reproduction(s)
- facsimile(s) or reproduction(s)
- facsimile(s), etc.
- facsimile(s)
- reproduction(s)

Decide upon a term and be consistent.

Both "carrier" and "physical carrier" appear in the rules; it is unclear if there is an intended semantic difference between them.

It is unclear what the motivation would be for:

- referring to the number of pages of a book as "technical description"
- changing "microform" to "micrographic"
- using "accentuation" in a non-standard way

The terminology denoting B7 and C6 materials seems quite inconsistent. Select a distinct term only for each needed concept (appropriately distinguishing between types of content vs. media), use them consistently, and define them if appropriate.

Since space is not the problem it was in card catalog days, there is substantially less motivation to use abbreviations. For many years, it may not have been an accurate assumption that the majority of our newer catalogers and users know Latin words and abbreviations. It is time to switch to terms in the language of the catalog. For example:

Existing term	More common, useful term
i.e.	that is
title proper	citation title
other title information	subtitle
et al.	and others
s.l.	no place of publication identified
s.n.	no publisher identified

Reference structure

On the one hand, the significantly increased reference structure will hopefully ensure that catalogers get to the rules they need. On the other hand, it bloats the text, and slows down the process of cataloging. We need to strike an appropriate balance.

We hope that at least the electronic version will have reciprocal links from Sections B and C back to A.

The presence of so many "see" and "see also" references in A1 to instructions in other chapters and sections makes for overly busy text.

It is important to be consistent in reference structure. It is dangerous to refer to a rule at some relevant rules, but not others. That is confusing, and lessens the likelihood that catalogers will remember the existence of the referred rule when at rules that don't refer. For example, A1.0F is appropriately placed in A1.0, which designates that it applies to all of Part I. Some later rules in Part I (such as A1.1B1) refer to A1.0F, while most don't, although whether the reference is present or not has no bearing on the fact that A1.0F still applies to all Part I rules (unless otherwise specified at a specific rule).

A1.0F3 obviates the need for references to Appendix B scattered throughout the rules.

B. Functional Requirements

It is unclear how any of the objectives or principles in this section are advanced by recording the place of a multi-national publisher or of a publisher that moves around during the life of the resource. Consideration should be given to making A1.4C optional or even not recorded in these situations.

Objectives:

Responsiveness to user needs

By expanding terminology of the GMD, and including terms for content and medium, resources can be described better for the public

The use of punctuation to delimit data elements is becoming less common in displays of bibliographic information in non-library systems. If AACR is going to be concerned with display, it is time to call for labeled displays, in the language of the catalog. For shared electronic records, system tagging can be used to generate the displays.

It has become quite evident that our users want to retrieve resources in many ways other than the traditional author, title, and subject. AACR3 needs to treat nearly all data elements with an eye

toward resource retrieval, not just resource identification. We can provide new service to current non-users if AACR3 structures metadata in the description with an eye to "repurposability".

Given that users search on parts of the "description" such as publisher and language, thought should be given as to whether these elements should utilize standardized terminology, that is, authority control. Our traditional distinction between description and access has become in the broader information community free-text vs. "pick lists," etc. (what we call controlled vocabulary).

Instruction on changing hyphens to slashes in combined numbering should be included in A1.3A4, and relevant example updated. This reduces ambiguity in the display: "1995/1996-1996/1997" is much easier to read than "1995-1996--1996-1997".

Using the chief source of other information and other preliminaries for the Publication, distribution, etc. area may lead to a return to a lot of bracketing for serials catalogers – something we thought we had finally eliminated by using the entire resource as the prescribed source for this area in AACR2 12.0B3. This will also be true for remote e-serials- publication information often comes from sources other than the issue. Given the number of possible sources and variation of tile presented in e-serials, this is a problem.

Cost efficiency

It is not clear how this differs from the Ease and efficiency of use principle earlier in the template. Is this meant to be about the efficiency of the user?

The draft does not incorporate the approach of using a single description for multiple manifestations, which many American libraries use. PCC's CONSER program has seen successful use of this approach, in particular for serials in multiple aggregator databases, and we need to be able to continue to use it to reduce user confusion and realize cost-effectiveness in cataloging. The whole multiple versions problem is still with us, and is getting more prevalent and more complex. AACR3 needs to take intellectual leadership on this issue.

Most American libraries follow the current LCRI's for rule 1.11A and chapter 11, which we feel saves us significant time in cataloging reproductions. We want this approach to be covered in AACR3. Library and Archives Canada also has relevant rule interpretations which should be considered.

Format independence

AACR3-generated descriptions do not function to their fullest potential because of delimiters embedded in data (ISBD punctuation), lack of explicit identification of some subelements, anachronistic limitations of amount of metadata included, etc. Most American catalogers are working with online systems in which the layout of public and staff displays of bibliographic records are very different from what AACR2 dictates. AACR3 needs to be usable in our current environment. This is a case where the objective Modernness needs to trump Format independence. The majority of us should not be mis-served because some libraries do not have online systems.

There remains a card bias in AACR3. Please consider removal of instructions related to catalog card formatting, i.e., punctuation between areas.

It would be beneficial to more fully embrace FRBR concepts, terminology, relationships, and even its structure, which would provide more flexibility for catalog designers, whether the desired output is bibliographic records as they look today, or a FRBR-structured catalog.

new objective: Flexibility

This needs to be another objective for AACR descriptions.

new objective: The catalog

JSC's Statement of Policy and Procedures states that "JSC takes into account the potential impact on existing catalogues and files when considering proposed changes." The introductory matter presenting the draft to the constituencies states that: "The revisions being undertaken will entail a re-articulation of the function of the catalog." This is a laudable goal, one that deserves its own set of objectives and principles.

AACR2 and AACR3 put most of their emphasis on the creation of individual bibliographic descriptions. In many libraries, the direction is more and more toward incorporation of large sets of records from cataloging service providers, publishers, aggregators, etc., and toward manipulation and modification of existing records. This needs to be recognized in the rules.

Harmony with existing records and catalogs

It is imperative that this be a functional requirement for AACR3. Obviously this sometimes gets trumped by other objectives, but it does need to be addressed.

One example of a rule that would have a inharmonious relationship with existing records is A1.0A2. The community is divided on its perspective on this rule. Some feel that congruence across all types of material is worthwhile. Others feel that this is too big of a change from AACR2, and existing records, especially for many periodicals. I believe that given more time, the cataloging community could forge a consensus on this issue. The surprise nature of the changes here has put many of us on the defensive, especially because no rationale is given.

Principles:

Differentiation

Sufficiency

Relationships

This is an example of a principle that will suffer by the relative distinct processes in place for the different Parts. In AACR2, designation of relationships occurs in both the description and in access points. This issue deserves a wholistic thought process.

What does appear in this draft on relationships is insufficient. Explicit discussion of relationships in the rules, at least in the form of a checklist, is important. Relevant relationships that a cataloger does uncover need to be more explicitly identified to users.

A1.7B9 greatly improves instructions for providing information on relationships for monographs.

Representation

There is not unanimity that this should be a principle governing AACR3 descriptions. This needs wider discussion.

Transcription is far less used in other standards, and is likely a feature that would reduce wider utilization of AACR3. When other standards give metadata application guidelines, they often emphasize what the record creator knows/figures is true. We need to balance the costs and benefits of transcription.

A re-examination of our principles of transcription is needed. Are our users best served by transcription? Are there situations where cataloger's judgment in how to record information

would be more beneficial? Some of us think that we should move way from transcription as our overarching principle for the data we give in our records, at least for some elements. For example, should we omit statements of responsibility, relying only on access points for this information?

Accuracy

Some of us feel that this is a much more important principle than Representation.

Uniformity

It is not clear how valuable this principle is in the age of online systems. This is especially true if AACR3 is not to be a display standard.

In modern encoding schemes, all data elements are designated, so order becomes less important.

It is fine to standardize how punctuation, capitalization, and abbreviation are to be used for their normal purposes in written language--in other words to establish a style manual. ISBD punctuation is a wholly different matter.

Uniformity in terminology is another way of saying authority control, which we do continue to support.

Common usage

Utilizing terminology that is used and understood by our users is indeed important. We need to be vigilant about this in areas beyond the technical description.

Again, it is important to remember that we have the technical ability in this day and age to store content using precise technical terminology, but display the metadata in terms geared toward specific types of users, such as children, scientists, speakers of languages other than English, etc.

2. Organization of the rules

Comments on the scope and organization of the sections and chapters in part I:

Poor design in AACR2 remains in AACR3. The structure of the rules is notationally hierarchical, but is not so with respect to content. This causes unnecessary complexities:

- in training new catalogers,
- for current catalogers who occasionally catalog types of material beyond their normal areas of expertise, and
- in automating support for cataloging.

There seems to be no principle governing what gets grouped together in a rule and what is kept separate, nor the order of subrules and text within subrules. Rules should be organized by what the cataloger sees, not by what should be done with the data. Especially given that the primary difference in Part I between AACR2 and AACR3 is structure and organization, it is quite puzzling why these design flaws have not been fixed.

In the process of deciding upon a numbering system for the rules, bear in mind the value of short rule numbers, which are easy to remember and cite.

The carry-over of the misguided and artificial use of "ghost" levels of hierarchy for rules with only one subrule, which began with AACR2R, adds unnecessary (and therefore undesirable) complexity to the structure to the rules. For example, at B.3.3E:

B3.3E. Digital graphic representation

B3.3E1. [text]

is more simply given as:

B3.3E. Digital graphic representation. [text]

Information appropriate to authority records (such as that covered in A1.6F and A2.1F16) should not be repeated in bibliographic records (other than the heading itself of course).

Section A – General rules

Given the complexity of the reference structure in A1 and the relative brevity of A2 and A3, that A2 and A3 should simply be folded into A1. This would then allow us to make each area a chapter of A (which would reduce the length or rule numbers by one level!), and would benefit the restoration of the concept and term "continuing resource". This would then raise the question of whether Sections B and C should also be merged into the chapters by area.

Scope and organization of chapter A1 – General rules for description

A1.0E1: This rule instructs a cataloger to take a particular action "wherever practicable". It also needs to say what to do if that is not practicable.

A1.1A2, second paragraph: This rule needs to cover the situation of the existence of a part number without a part title. Perhaps: "Precede the enumeration or alphabetic designation of a section or supplement (see A1.1B8) by a full stop. Precede the title of a section or supplement by a comma, unless the title of the section or supplement is not preceded by an enumeration or alphabetic designation, in which case precede the title by a full stop." Or: "Precede the title of a section or supplement (see A1.1B8) by a full stop, unless there is enumeration or alphabetic designation in addition to or instead of the section title, in which case precede the enumeration or alphabetic designation by a full stop and precede the title, if there is one, by a comma."

A1.1B8: It might be worth treating the parts of the title proper element for a common title/section title situation distinctly. Each could then be defined discussed, and exemplified separately: title of parent resource, numbering, title of the child resource.

A1.2B3: It is not clear why special interest edition statements and reprint/reissue statements from AACR2 chapter 12 were excluded here.

A1.6 vs. A2: Consideration should be given to bringing more into synch the rules for series and the rules for resources issued in successive parts, as series are by definition issued in successive parts.

A1.6F: If this rule is kept, the scope should not be limited to ISSNs, but expanded to include other standard numbers. In particular remember that ISBNs are assigned to some series.

A1.7B11: The second paragraph belongs in A.2.

A1.7B27: The different parts of this belong in A2, A3, and C7.

A1.8B4 needs to specify that the incorrect number must also be recorded.

A1.8C1 should cover the recording of abbreviated key-titles.

A1.8E1: We agree that it is a good idea to make qualifications to the standard number optional.

Scope and organization of chapter A2 – Resources issued in successive parts

We feel it is appropriate to consider the LCRI practice for treating publications of limited duration as serials.

*Scope and organization of chapter A3 – Integrating resources***Section B – Supplementary rules applicable to specific types of content***Scope and organization of chapter B1 – Text**Scope and organization of chapter B2 – Music**Scope and organization of chapter B3 – Cartographic resources**Scope and organization of chapter B4 – Graphics**Scope and organization of chapter B5 – Three-dimensional resources**Scope and organization of chapter B6 – Sound**Scope and organization of chapter B7 – Moving images*

B7.1E6: If kept, this rule should be slightly modified in scope: "If the resource is a trailer containing extracts from a larger commercially released or distributed moving image work, and transcribed data does not show this, add [*trailer*] as other title information."

Section C – Supplementary rules applicable to specific types of media*Scope and organization of chapter C1 – Print and graphic media**Scope and organization of chapter C2 – Micrographic media**Scope and organization of chapter C3 – Tactile media**Scope and organization of chapter C4 – Three-dimensional media**Scope and organization of chapter C5 – Audio media**Scope and organization of chapter C6 – Projected graphic, film, and video media**Scope and organization of chapter C7 – Digital media***3. Focus of the description****Comments on instructions in the Introduction and in rule A1.0A1 on focus of the description:**

The structure and organization of this rule is unwieldy and unprincipled.

We cannot fully evaluate the focus for the description without seeing the General Introduction or Parts II-III.

It would be useful to more explicitly discuss the decision factors to use in determining which "level" in a whole/part hierarchy of resources should be described in a record ("analysis"). This is often the first decision a cataloger will need to make in confronting multilevel resources, and the decision needs to be made in a principled way.

In many situations a cataloger will not be able to determine whether a multipart resource has been issued simultaneously or successively (for example, when a publication date is lacking, the date is the same on all parts, or the resource was received in toto as a gift). AACR3 needs to give guidance for this real-world situation.

It is unclear how A1.0A1, A1.0G, and A1.0H interact.

In b, a more useful order would be: v, iii, iv, ii, i.

4. Resources in an unpublished form

Comments on the scope and placement of rules pertaining to resources in an unpublished form:

This higher visibility of rules for unpublished resources is very welcome.

General rules (A1.1B11, A1.2A1, A1.4C8, A1.4D9, A1.4F8, A1.7B12.2, A1.7B14, A1.7B30)

A1.2A1: Add "or broadcast" to the end of the last sentence.

A1.4C8 & A1.4D9: Change "unedited or unpublished film or video" to "moving images not commercially released or broadcast".

Supplementary rules applicable to text (B1.1B11, B1.1E6, B1.4F8)

Rules on resources in an unpublished form from AACR2 omitted from the draft of AACR3

5. Resources issued in successive parts

Comments on rules pertaining to resources issued in successive parts:

Instructions precluding the use of multilevel description for sections of a serial were not carried over from AACR2. Unless there is a convincing reason not to, this should be restored.

Numbering area (A1.3)

A1.3: This whole section should be reduced to just A1.3A1 and A1.3A4. A1.3A3 and A1.3B-G belong in A2 and A3, just as the music and cartographic resource rules refer out. A1.3A2 is unnecessary here; the first paragraph should be moved to A2, and the others deleted.

A1.3C2 needs to cover the situation of dates of multiple calendars appearing in a source.

A1.3E1: Sometimes when multiple numbering schemes occur, they do not all identify at the same level (one may go deeper than another). In that situation, it would seem beneficial to record the deepest scheme here, as the current LCRI directs. It would make sense to follow that with any additional schemes that are at the same level. But since there is not a one-to-one correspondence between schemes that go to different levels, a note seems a better place for those other schemes.

Title and statement of responsibility area (A2.1)

Edition area (A2.2)

Publication, distribution, etc., area (A2.4)

Technical description area (A2.5)

Series area (A2.6)

A2.6G1 and A2.7B17.1 seem to conflict, and do not refer to each other.

A2.6G1: A1.6B1 needs to refer to A2.6G1, which needs to account for how integral numbers are handled for these materials. The number needs to be taken out of the series title statement and replaced with the mark of omission, and the number put after the series title statement.

A2.6G1 should be optional. There are situation where it is quite valuable to indicate the numbering within the series, for example, for a long run of a serial analytic.

Note area (A2.7)

A2.7B: The situation covered by AACR2 12.7B22 needs to be included in A2.7B. This is different from the situation that A1.7B25 handles. Serials may be issued separately at some times and with other serials at other times; they may be "issued with" different other serials at different times. There is no "resource lacking a collective title" of which any of the serials involved may be said to be a "component." Any "component part of a resource lacking a collective title" occurs only at the issue level, not at the level of the serial resource being described. Another option could be reworking A1.7B25.

A2.7B11 needs to provide instructions to record numbering information in a note when it is not recorded in area 3, as when cataloging not from the first/earliest piece.

A2.7B13.1 should be deleted. This is already appropriately covered at A2.7B12.1.

A2.7B17.2: Bring this rule into synch with A2.6K1: "Make notes on additions, deletions, or changes in series statements that occur after the first/earliest issue or part, if this change cannot be stated clearly in the series area and if considered to be important."

6. Integrating resources**Comments on rules pertaining to integrating resources:**

Title and statement of responsibility area (A3.1)

Edition area (A3.2)

Publication, distribution, etc., area (A3.4)

Technical description area (A3.5)

Series area (A3.6)

Note area (A3.7)

Standard number and terms of availability area (A3.8)

7. Assembled collections**Comments on the scope and placement of rules pertaining to assembled collections:**

This higher level of inclusion of rules for assembled collections is very welcome.

General rules (A1.4C8, A1.4D9, A1.4F8, A1.5B5, A1.5D3)

A1.5B5 has a significant, inappropriate bias toward print material, as it covers linear feet of shelf space, excluding remote electronic resources and other resources not shelved in this way.

Supplementary rules applicable to text (B1.1B11)

Supplementary rules applicable to print and graphic media (C1.5D3)

8. Early printed resources**Comments on the scope, placement, and application of rules pertaining to early printed resources:**

General rules (A1.4D1, A1.4G1,)

Supplementary rules applicable to print and graphic media (C1.5B2.1.19,

C1.5D1.1, C1.7B13.2, C1.7B28.1)

Rules on early printed monographs from AACR2 omitted from the draft of AACR3

9. Sources of information

Comments on the generalization and reworking of rules on sources of information (A1.0A):

This rule uses both the terms "pertaining to" and "for". It is unclear what the difference is between them.

The generic use of "collective" is not clear enough to create uniformity across records. For example, does it include cover plus masthead of a periodical? an About window plus HTML header for an electronic resource? Taking this to the extreme, catalogers could select whatever sources they want and consider them a collective chief source.

Several rules (such as A1.0A5 and A1.2A2) reduce the prescribed sources for an area from AACR2. This will increase the use of bracketing, which does not serve users, references staff, or catalogers.

A1.0A2: The selection of a chief source seems to be much more open to cataloger judgement. While we applaud the increase of the use of cataloger judgement when appropriate, in this rule that produce descriptions that are far less uniform and predictable. This will increase the number of duplicate records, the time spent searching for copy, and the time spent by catalogers trying to determine prominence and degree of completeness.

A1.0A2: It is unclear what to do when two prominent sources are arguably equally complete, one being more complete for some elements, and the other being more complete for other elements. What if one source is somewhat less complete but bears a later edition statement and publication date?

A1.0A2: If the current structure of A1.0A1 is kept, dividing A1.0A2 in a similar manner should be considered.

A1.0A2: To aid serials check-in staff and to take advantage of their eyes spotting title changes, among other reasons, the serials community got AACR2 changed to prefer more accessible chief sources. This AACR3 rule rolls that back for no explained reason.

A1.0A4: The initial phrase "If the resource lacks a chief source of information" is unclear. Does it mean if the manifestation lacks it (there never was one) or the item lacks it (it is missing, faded, etc.)? These are different situations and would benefit from separate treatments.

A1.0A5. The lack of a preferred order of prescribed sources for the series area and the instruction to "generally prefer information appearing on the chief source of information to information found elsewhere" (currently the series t.p. is the preferred source for this area) will cause problems when it comes to establishing series headings and identifying series title changes. There must be coordination between the rules governing transcription in the series area, the rules governing choice of title proper for serials and multipart, the rules governing series headings, and the rules governing title changes.

A1.3A2: The AACR2 instruction to only record the numbering area when cataloging from the first and/or last issue or part has been removed for no explained reason.

10. General material designation

Comments on the revision of rules on general material designation and the terms used as GMDs (A1.1C):

The GMD needs to be removed to a different, more appropriate area of the description.

If AACR3 is going to be a display standard, the GMD is one of the elements that would strongly benefit from separating the recording of data (in precise, technical terminology, as is proposed in the AACR3 rule) from the display. For example, data stored as "cartographic resource : print" could display as "map". Barring that, at least put the medium term before the content term, since that corresponds much more closely to normal English use.

It is confusing that some terms appear in both the content list and the medium list.

Some of the content terms are count nouns, and some are mass nouns; one type of noun should be used.

Consideration should be given to replacing "choreography" and "music" with "choreographic notation" and "musical notation".

It seems odd to have "digital" but not "analog".

The second paragraph is counter-productive. Area 3 needs to be repeatable. Then "mixed content" can be removed from the content list.

footnote 4: The practice of giving "GMD" as the GMD is not helpful. Real GMDs should be used in examples. We don't do this for any other element, in particular the SMD. It is not clear how the current practice is helpful.

11. Publication, distribution, etc. area

Comments on the revision of rules pertaining to the publication, distribution, etc., area:

A1.4C5 & A1.4D4d: The "home country of the cataloguing agency" should not appear in the rules at all. Which country happens to catalog a resource first should have no bearing on the description. This discourages international sharing of records.

A1.4D2: The first sentence of this rule is highly unrealistic. For many cataloging situations, it is unclear how to even go about determining how a publisher "can be understood and identified internationally". Even when it is, this is not a cost-effective way to determine form of name. If the publisher name does not come under authority control, this rule should dictate straight transcription rather than shortest form, giving guidance of how many levels of publisher corporate hierarchies to give.

A1.4G: This rule should be eliminated in favor of making area 4 repeatable. This would allow dates of manufacture that are different than dates of publication to be recorded. General guidelines governing repeatability can be included in A1.4B.

Elimination of the use of "s.l." and "s.n." (A1.4C6, A1.4D7)

12. Technical description area

Comments on the scope, placement, and application of rules pertaining to technical description:

Trying to generalize this entire area makes it extremely lengthy and confusing to use. All the rules in this area that apply to a single type of material represented in a section C chapter, should be moved to C.

A1.9B2: It is helpful that the technical description is repeatable for this type of material.

General rules on extent (A1.5B)

A1.5B2: Instruction needs to be provided on how to handle the situation where it is not clear from the item in hand how many physical units the manifestation was originally published/released in.

General rules on other technical details (A1.5C)

A1.5C1: It is not clear what the rationale is behind the new ordering of other technical details.

A1.5C1: It would seem more logical for the special format characteristic "closed-captioning" to be adjacent to the sound characteristics.

A1.5C13 provides the option of recording information about single vs. double sided material for digital resources, but I do not see a corresponding option for analog sound material (e.g. vinyl records). Don't we want to allow this too? And why are some digital characteristic notes here and others relegated to section C7? (This is a question that kept coming up as we reviewed the rules).

General rules on dimensions (A1.5D)

General rules on ancillary material (A1.5E)

A1.5E1, third paragraph: It should be made clearer that the main item of a resource does not have to be a serial or an integrating resource to have ancillary material that is issued in successive parts.

A1.5E1b: The relationship between A1.5E1b and A1.5E4 is unclear.

Supplementary rules applicable to print and graphic media (C1.5)

C1.5B2.1.6 should include the current LCRI option of recording this situation as "1 v. (unpaged)".

Supplementary rules applicable to micrographic media (C2.5)

Supplementary rules applicable to tactile media (C3.5)

Supplementary rules applicable to three-dimensional media (C4.5)

Supplementary rules applicable to audio media (C5.5)

Supplementary rules applicable to projected graphic, film, and video media (C6.5)

Supplementary rules applicable to digital media (C7.5)

Potential for further generalization of rules on technical description (e.g., X.5C10)

13. Note area

Comments on the scope, placement, and application of rules pertaining to notes:

Rules for notes that relate to other areas should be moved out of X.7 to those areas. The generalizable portions of A.7A should be moved to A1.0.

Notes should indicate whether they are to be displayed to the public or not.

Introduction to Part I: The paragraph on notes belongs in 1.7.

A1.7: The designation of notes as optional or mandatory is not clear. A review of all notes to determine which should be mandatory and which should be optional (such as those at A1.7B19-21) is needed.

A1.7A3 & A1.7A4 : These and other rules which address the citation of related works in notes are not in sync. The former instructs one to use title proper and statement of responsibility and gives the example "Adaptation of: Germinie Lacerteux / Edmond et Jules de Goncourt"; the latter says to prefer "the title or name-title under which the resource is entered or would be entered" unless it is not possible to determine what this would be. It is certainly possible to determine the name-title under which Germinie Lacerteux is entered, so these are contradictory. Even within A1.7A4 the option is given to cite Kipps by H.G. Wells either way. If either pattern of citation is equally valid, then the rules should say so; if the preference actually is for entry/title, then the examples should reflect that.

A1.7B is far too directive on the order of notes. Consider rewording as:

Order of notes. Make notes in the order that meets the needs of users. The sequence in which the following rules are given may meet the needs of some user communities. Make a particular note first when that note is of primary importance.

A1.7B8: Other forms of name belong in authority records, not bibliographic records.

A1.7B17: This data should be in the series area, not the note area. A1.6 needs to be reworked to cover the situation for resources issued in successive parts when only some of the parts are in a series (the second example at this note rule).

A1.7B21: The text of this rule needs to be broadened. Otherwise most of the examples are technically incorrect.

A1.7B21: The second paragraph is far too restrictive, and contradicts 1.7A2. Many libraries have table of contents projects which are taking data from the contents lists either through OCR, or using digital data from the publisher.

A1.7B28: Item-level information does not belong in a bibliographic description; delete this rule.

A2.7B5 needs to include provision for giving notes on changes to title elements other than the title proper, as AACR2 did.

Generalization of rules on notes (e.g., A1.7B15)

Potential for further generalization of rules on notes (e.g., X.7B21)

14. Glossary

Comments on the terms and definitions included in the glossary:

Further minimize the number of technical definitions (that is, the ones for concepts we devise, as opposed to those which explain how terms are used in the "real" world), such as at "edition," "digital" (media vs. resource), "part," and "reprint." Find other terms to use when possible, so that one term means one things in the rules.

We need to have terms for both the resource as a whole, and a resource excluding its ancillary material ("primary" or "core" or "base"?).

The whole glossary needs a thorough review. All terms used in the text with specific library meanings should be in the glossary. Terms that need defining, redefining or replacement include:

categories of terms

- all the group 1-3 FRBR terms

- all the GMDs

- terms related to moving images (overlapping usage and definitions)

individual terms

- alternative title (circular)

- bibliographic (to make clear that it does not just indicate books or print resources)

- carrier vs. medium (overlapping usage and definitions)

- content (as type of GMD)

- corporate body

- dependent supplement

- digital resource (current definition is very broad; would include audio CDs, etc.)

- focus of description

- format

- medium (as type of GMD)

- preliminaries (the term--not the definition--is too print-centric)

- prominent

- published/unpublished (including reducing print-centrism, such as "commercially released or broadcast" for moving image material)

- publisher

- resource

- statement (in our technical sense, as in "edition statement")

- title frame (shouldn't it need to contain the title?)

15. Style

Comments on matters of style:

"Photo" is treated as a word rather than an abbreviation in modern English dictionaries, so it should not have a period after it.

For clarity, punctuation marks should be given by name as well as the symbol itself. For example, at A1.0F5 it is not easy to tell whether the horizontal line symbol is one hyphen, two hyphens, or a dash.

Preliminary rules for chapters should be renumbered from X1.0 to X.0. For an area, the general rule should be numbered X.XA1, with the preliminary rules at X.XA2 forward.

The profusion of the phrase "on the source of information" throughout Part I does not aid in understanding the concept of sources of information, it bloats the text, and it introduces ambiguity.

Tables of contents for chapters and areas

The expanded tables of contents are helpful.

Captioning of subrules

References to related and supplementary rules

Clarity of instructions

16. Typographical and grammatical errors, etc.

Please reference errors, etc., in the form: [page number] - [rule number] - [paragraph or example number]

p. A1-6 - A1.0A1 - last paragraph: "resources" should "resource"

p. A1-14 - A.1.1A1- 2nd paragraph: "appears" should be "appear"

p. A1-14 - A.1.1A1- 2nd paragraph: The end of the last sentence seems to have been accidentally been chopped off. It does not say what to do if any of those conditions apply.

p. A1-18 - A1.1B11 - 1st paragraph: Both instances of "e.g." in the rule should be followed by a comma.

p. A1-55 - A1.5A6 - 4th paragraph: - "preceded" should be "precede"

p. A2-8 - A2.5C14: In the last sentence "physical" was not changed to "technical".

p. A2-14 - A2.7B27 - caption: should be just "Issue or part described"

p. A3-10 - A3.7B27 - caption: should be just "Iteration described"

p. C6-4 - C6.510.1 - last two examples: "col." should precede "sd."

p. C7-3 - C7.5B1 - 3rd paragraph: "A1.59" should be "A1-59"