

PCC SCS comments on RDA part I

submitted February 2006, Paul J. Weiss, Chair, PCC SCS

Comments in red are the ones that I feel are of greatest importance. --Paul

Overall comments

We appreciate that JSC heard many of the comments that were made in the review of AACR3, and made significant changes that we see now in RDA. However, after much reading, thinking, and talking with colleagues, with very mixed emotions, Some of us feel that we need to again stop the current process and take an even more radical change of course. We don't say this lightly, as we greatly respect the people most closely involved with RDA development. Although this draft is a definite improvement, it has not gone far enough to become a modern, useful, usable metadata standard. A reorganization of rules with increased consistency is great, but is not worthwhile on its own to engender so much work. We strongly agree with Karen Coyle that "if we in the library field do not develop cataloging rules that can be used for this digital reality, we will find once again that non-librarians will take the lead in an area that we have assumed is ours." We more firmly believe now that it is far more important to get out a good standard, rather than one that can be published in a certain year. We doubt that we will likely never again such a golden opportunity for us to have a major positive impact in the broader information community.

As was suggested at Midwinter, some of us feel that we should restructure RDA as a data dictionary and application profiles. Such resources as MARC 21, EAD, VRA Core, and METS provide good models of a data dictionary structure. The data dictionary structure enforces consistency across element descriptions and makes it much quicker to find needed information in the standard. RDA should develop a method for registering application profiles. Each application profile would deal with such aspects as mandatory-ness, repeatability, transcription, data normalization capitalization, abbreviation, etc.), sources of information, level of granularity of a resource, level of specificity of elements (*title* vs. *title proper* + *parallel title* + *variant title* + ...), community-specific examples, etc. All RDA records would be explicitly identified as complying with one or more application profiles.

Currently in RDA there is some implicit hierarchy to data elements: the *title* element is composed of the *title proper*, *parallel title*, *variant title*, etc., subelements, for example. This is helpful, because it allows such sections as 2.3.0 to have scope over many particular subelements. There are some anomalies (the *edition* element is composed of the *edition statement*, *statement of responsibility relating to the edition*, etc., subelements, but the *edition statement* subelement seems to be composed of itself and the *parallel edition statement*), and these should be avoided. We should be more explicit with these hierarchies, because knowing about them will matter when different communities decide the structure/format/syntax for storing and exchanging RDA records. We also need to take more advantage of them, to help us with intrarecord interelement relationships, such as between a publisher, a place, and a date.

We strongly agree with Karen Coyle that RDA is “more about how cataloging was done in the past than how it might be done in the future. This is cataloging done by people sitting at desks with the item in hand, contemplating title pages, covers, prefaces, etc. ... There is also no recognition that many digital libraries expect that in the future much cataloging will have to be done by automated means in order to have any chance of creating metadata for digital resources. ... And we need to create cataloging rules that take into account the reality of machine-to-machine communication and the derivation of data elements by algorithms.”

It is time for us to realize that we are not in the cataloging business. We are in the information services business. In the past, our traditional cataloging supported those services. However, the world is a vastly different place than it was when we first standardized cataloging. Metadata is far more generally available than it used to be, and comes in many more varieties of types, formats, sources, extents, and qualities. Administrators in libraries and their parent organizations continue to face limited budgets and increased calls for accountability. We need to ensure that our policies and practices are cost-effective. That is, we need to show that we deliver metadata that is worth more than the cost of producing it. The current path of RDA does not lead to such cost-effective instructions. As a profession, we need to face the new reality and evolve, or we will die. If we don't produce a 21st century standard, others with far less experience with metadata will. As Diane Hillmann has written, “There is no other alternative-- we are already late to the table, and we come with a reputation for impatience with those who do not have library training.”

One example of an issue for which changes in the world around us necessitate our relooking at the cost-effectiveness of what we are doing is duplicate detection. Some of us feel that duplicate records had a far more negative impact in the past than they do now. We need to consider the possibility of simplifying some rules so that metadata production will be faster and cheaper and able to be created by people other than fully trained catalogers, recognizing that we may generate some duplicate records along the way. It may be more cost-effective to generate 100 metadata records that may duplicate a couple of pre-existing records than only generate 70 records with no duplication.

We feel more strongly than ever that it is folly to believe that RDA can be effectively developed piecemeal. We need a tightly integrated standard, and each part informs the others. There are too many places in this draft that relate to parts 2-3 to be meaningfully evaluated before the other parts are available.

As UC's BSTF report states, libraries “offer a fragmented set of systems to search for published information (catalogs, A&I databases, full text journal sites, institutional repositories, etc) each with very different tools for identifying and obtaining materials. For the user, these distinctions are arbitrary.” We need to recognize this as our current environment, and design RDA knowing that we directly control a smaller and smaller portion of the metadata pie.

As UC's BSTF report states, “It can be helpful to think of metadata provision as an ongoing process versus a one-time event.” We need to design RDA for a world where metadata gets

created in one place but then gets copied, modified, abridged, expanded, translated, mapped into another system, etc. RDA needs both to produce records that are repurposable (including use by metasearch engines) and to provide for the repurposing of non-RDA data.

Add a new section on the concept of cataloger's judgement, and one on what to do when you are unsure about a situation (such as when you do not know the mode of issuance).

Most of the information in the Introduction to part I and in chapter 1 would seem to have parallels in the other parts, so it seems odd that this type of information is covered in part I. We would go so far as to say that maybe there shouldn't even be introductions for the parts, but rather a single Introduction for the whole document. Also, create a single chapter 0, covering language and script issues, transcription, and formulation of notes, that would apply to all three parts. We have problems currently in AACR2: some topics are covered in the Introduction to part I, but not in the Introduction to part II, and catalogers are left trying to figure out whether they should use the principles of part I in part II. LCRIs for 0.X rules are forced to include instructions for part II because there is nowhere else for those instructions to go. We point out at individual rules various instances of this needed generalization.

RDA needs to deal explicitly with relationships among metadata elements for a single resource, such as parallel titles and their statements of responsibility, and publishers and their places. Structural metadata is needed to indicate such relationships. (This is an example of the disadvantage of separating content from formatting.)

A new section is needed to discuss database management, as more and more of our time is spent modifying existing records rather than working on new ones. The rules need to support this activity as well as they support initial cataloging.

In addition to an alphabetical glossary, and repeating some definitions in the text, it would be quite helpful to also have a hierarchically arranged glossary. For example:

- title ...
 - title proper ...
 - parallel title ...

Strategic Plan, goal 4, 4th bullet says we will repeat definitions from the Glossary in the text. Although we think it is a good idea for users of RDA to have terminology discussed where it is being used, in addition to a glossary, repeating text usually becomes a maintenance nightmare, with some places getting revised, but not others, etc. We hope that for the online version the text will only exist once, but displayed in two (or more) different places.

Some of us believe that continuing the ISBD convention of maintaining differences between information recorded in *statements* and *notes* is not helpful in our modern world. There are metadata standards, such as Dublin Core, that do not even have a concept of *note*. If the library community could itself get out of this mindset of strict distinguishing of notes from other data, it would make it much easier to implement the repeatable 260 field for example. If the concept

of *notes* is retained, create a general section on notes in chapter 1, and treat notes as subelements of each of the other data elements, rather than as separate data elements.

In the past (often for display real estate reasons), we have allowed only one instance of many data elements. This is no longer justified in our modern environment. Even *title* can be repeatable without disaster. One example of how changing our thinking on this will make database management easier is data about previous iterations of integrating resources. If rules said “Retain [information] ... on earlier iterations ...” rather than “Make notes on” would make maintaining this records simpler.

A *Conventions used* section should be added to the (General) Introduction describing such conventions as typefaces, special symbols (such as the diamond introduced in 0.1.7), and bulleting (if used in any special ways).

Objectives and principles document

We think the time spent on developing explicit objectives and principles has been quite fruitful. However, we agree with Diane Hillmann that “discussion has gotten quickly to the nitty-gritty, without spending sufficient time on the principles.”

The intended difference between *objectives* and *principles* remains unclear.

1, Objectives, Adaptability: It is not clear what this objective means.

2, Objectives, Responsiveness to users needs: This objective needs to be weighed much more heavily than Representation or Attribution. We need to be user/service-centered first and foremost, and resource-centered a much more distant second.

2, Objectives, Responsiveness to users needs: If this is truly an objective that we want to achieve, then we need to allow for many more data elements (which of course can be optional). Examples include cover art for books, reviews, publisher blurbs, excerpts, color of the carrier, research methodology, disciplinary theory followed (such as relational grammar, lexical-functional grammar, government and binding theory, arc-pair grammar, etc., in linguistics), and source of funding.

2, Objectives, Responsiveness to users needs: As a basic requirement, FRBR has *find* not just for works and expressions, but also for manifestations. This objective should also include locating manifestations.

2, Objectives, Continuity: As we already have to deal with many non-AACR records (both pre-AACR2 as well as those based on other standards), we think objective should be relatively low on the totem pole.

2, Principles, Differentiation: We should strive for differentiation not just for entities in our local files, but also in broader national and international files.

2, Principles, Relationships: It is unclear how these two principles (for descriptive data and access point data) differ. Are they intended to be the same, except for type of data? If so, let's merge into a single sentence.

2, Principles, Representation: We need to become more user-focused, rather than resource-focused. Also, this purpose will likely be difficult for other metadata communities to understand.

2, Principles, Attribution: We do not serve our users well by knowingly using inaccurate data in the main part of the description. Accurate data should be used for title proper, etc., with inaccurate source data transcribed in notes, etc.

2, Principles, Common practice: It is unclear what this sentence means.

This is how we see the draft of part 1 relative the stated objectives and principles, on a scale of 1 to 5:

1. Objectives and Principles for the Design of RDA

Objectives

Comprehensiveness = 3

Consistency = 4

Clarity = 3

Rationality = 2

Currency = 3

Compatibility = 3

Adaptability = [not sure what this one means]

Ease and efficiency of use = 3

Format = [not yet clear]

Principles

Generalization = 4

Specificity = 3

Non-redundancy = 1

Terminology = 2

Reference structure = 1

2. Functionality of Records Produced Using RDA

Objectives

Responsiveness to user needs = 3

Cost efficiency = 2

Flexibility = 4

Continuity = 5

Principles

Differentiation = [can't say without parts 2-3]

Sufficiency = 4

Relationships = 3

Representation = 5

Accuracy = 5

Attribution = [parts 2-3 issue]

Common usage = 4 [but we haven't reviewed chapter 3 or the GMD/SMD report yet]

Common practice = [can't say without parts 2-3]

Uniformity = 5

Draft of part I

What is the title of part I?

We very strongly support the separation of metadata vs. its presentation, and focusing RDA on metadata proper, although we are concerned about how various data for one element will display. There are a number of rules that still deal with presentation topics, however, such as square brackets, capitalization (beyond normal English, etc., style), the hyphen in numbering, the question mark in publication (etc.) dates, copyright symbols, parentheses around standard number qualifiers, and punctuation in dissertation information.

This draft is written more tightly than what we saw last year. However, the document still suffers from textual bloat--it is much longer than it needs to be. The primary (web) version of RDA will not be improved by redundancy. Other better ways to provide context and help navigation were discussed at the ALA Editions focus groups. We point out several instances of superfluous text at individual rules.

This draft is till too centered on print, text, and resources in the West European/North American publishing tradition; we point out specific examples below. It is perhaps wise to even go beyond format and type of content neutrality, to putting more effort into types of resources that even digitally in full form are less easy for users to find. Full text can be indexed and searched relatively well compared with musical sound recordings, moving image materials, photographs, etc. Perhaps it is time to be focused more on non-textual resources.

We prefer the meaningful chapter numbering in the draft of AACR3 to what is in this draft. It also allows for easier addition of new chapters.

The cataloging community's use of *description/descriptive* does not match the use of those terms by other library folk, nor by the larger metadata community. For example, the NISO document *Understanding Metadata* defines *descriptive metadata* as "metadata that describes a work for purposes of discovery and identification, such as creator, title, and subject." Also, we currently use *description* in two different ways: a set of descriptive data for a resource, and the normal dictionary definition. Context does not always provide sufficient evidence to quickly and easily decide which meaning is intended. The seeming non-existence of substitute terminology is additional evidence that our distinction between subject and non-subject descriptive metadata is not useful (We have additional comments on this point at 0.1.0.). We propose that we observe the following usage:

descriptive: the sense described in the NISO definition above

description: normal English usage

record: the set of data that describes a resource

If rule numbering is deemed useful (before it always seemed to be, but now is not clear if it really is), number every level of hierarchy. For example, in 2.3.2, give the sections *Choosing the title proper*, *Recording the title proper*, and *Change in the title proper* numbers. Yes, this adds levels to rule numbers, but it provides for a more realistic structure. These “hidden” levels of hierarchy in AACR2 in Cataloger’s Desktop cause problems--they are missing in TOC displays, links that apply to the whole section appear at the end of the previous rule, and therefore are very easy to miss, etc.

A style sheet would produce a more readable and consistently written document. I’ve pointed out many examples of lack of readability and consistency in our specific comments below. Here are a couple general examples:

Pick either “source of information” or “source” as the wording to use, and use that as much as possible.

Do this also with “numbering” and “enumeration or alphabetic designation”.

The philosophy for the top-level structure of part I (other than chapter 1) is unclear. 0.1.4. says that “chapters 2-6 each cover a set of descriptive data elements that support a particular user task (e.g., identify or select)”. It appears that the relationship between user tasks and part I chapters is:

chapter 2 find and identify

chapter 3 select

chapter 4 select

chapter 5 obtain

chapter 6 all, as they relate to items

What is the advantage of chapters 3 and 4 being separate, rather than being combined to form a single chapter for *select*. We realize that FRBR section 7 explicitly does not include user requirements related to items; nevertheless we would benefit from splitting this chapter up by user task, and moving those pieces to the relevant user-task chapter. If this is not done, the quotation above needs to be reworded to be accurate.

We’re also concerned that RDA still requires us to base the description of a reproduction on the reproduction, rather than on the original. Since it is a long-standing practice that US libraries will likely continue to follow regardless of what RDA says, and for good reason, describing a reproduction based on its original needs to at least be an option. Evidence shows that users primarily want and need the data about the original publication, not the specifics on when it was digitized or microfilmed. Another option would be to follow FRBR more closely and either create descriptions for both and treat them as related resources, or in one description record data for both, with each data element labelled as to which it belongs to.

It is more helpful to organize and label instructions by the situation the cataloger has, rather than by the result of following the instruction. I’ve pointed out examples in our specific

comments below. One example is 2.3.0.4 and 2.3.0.5 are labelled “Names of persons and corporate bodies” and “Introductory words, etc.” respectively. These would be more helpful if merged, under the rubric “Determining the title”.

One of the major problems we are seeking a solution on from AACR2 is multitype resources. This draft does not yet achieve that (such as in 2.2.1); specifics are in comments below.

It is not clear why wording about options varies, such as:

if it is considered to be important ...

... considered to be of particular importance

if it is considered to be necessary

optionally

Standardize the wording, and/or move all of this to 1.4.

Do not use the arrow bullet for general instructions. It reduces readability, loses meaning via ubiquity, is inconsistently utilized, and unnecessarily lengthens the document due to more white space.

Delete all instructions for prescribed punctuation. Rather, treat the pieces of data punctuated as separate data elements, with specified structural metadata as needed. If you retain any prescribed punctuation, centralize all such instructions in one section (probably also keeping such instructions in the elements).

Make clear that certain data elements only apply to particular kinds of resources, such as frequency only applying to resources issued in multiple parts.

Because the word *comprise* can mean either *compose* or *be composed of*, alternate terminology (perhaps *consist of* and *constitute*) would be clearer.

More modernization and dejargonization is needed. Some specific examples of this are described in comments below.

Without the glossary, we cannot fully evaluate part I. In particular, we need to see:

transcribe, record, supply, devise

archival resource

facsimile, reproduction (define *reproduction* broadly enough to include facsimiles; then we can use just one word)

Introduction to part I

It is unclear why some general information is in the introduction, and why some is in chapter 1.

It would be much easier to digest and utilize information currently given in this Introduction if it were split between background information, and actual instructions. It would seem unnecessary, even counter-productive, to give background information rule numbers. The

content that is instructions (0.1.2, some of 0.1.6, and possibly 0.1.8 (intent here is not clear)) would be best placed in chapter 1.

One section that is missing is one on what kind of information to expect at each data element. This is an important part of any well-conceived standard containing elements. See these resources for examples of this:

- CONSER Cataloging Manual, Introduction to Part 1, paragraph 5
- CONSER Editing Guide, D1. Content, Organization, and Layout
- Content Standard for Digital Geospatial Metadata, Organization of the Standard
- DCMI Metadata Terms, Section 1. Introduction and Definitions
- Encoded Archival Description Tag Library, Tag Library Conventions
- Getty vocabularies (Getty Thesaurus of Geographic Names, Art & Architecture Thesaurus, or the Union List of Artist Names), About the [vocabulary], Information in the Record (Fields)
- Library of Congress Subject Headings, Components of Entries
- MARC 21 format (any), Introduction, Organization of This Document, Components of the Detailed Descriptions
- Medical Subject Headings, XML MeSH Data Elements, Key to element information
- Thesaurus of Graphic Materials, Introduction, I.C. Structure and Syntax
- UDC MRF Database Development and Design, Database structure
- UNIMARC Manual : Bibliographic Format, 2. Organization of the Manual
- VRA Core Categories, Category attributes
- many XML DTDs and schemas

The section headings in 0.1 are inconsistent: 0.1.1 and 0.1.2 include “resource description” while 0.1.0, 0.1.3-0.1.9 do not. Only the heading for 0.1.4 includes “Part I”.

If it is correct that there will be no other content between this Introduction and chapter 1, renumber all the sections of this Introduction from 0.1.X to just 0.X.

The paging of this Introduction does not match that of the rest of the draft.

0.1.0

As it stands now, part I of RDA most definitely does *not* “provide a comprehensive set of guidelines and instructions on recording data to describe a broad range of resources in both analog and digital formats.” As has been pointed out before, it does not contain any guidance on many areas of bibliographic descriptive metadata: not subjects, classification, or shelving, and not all the specialized metadata for particular media or types of content. Although this is likely not what was intended, the quotation above comes across as pompous and insulting. The word “comprehensive” needs to be removed if the scope does not change.

The traditional cataloging segmentation of bibliographic data into descriptive data (or descriptive and name/title authority control data) and subject data is an artificial one, that is not shared with the larger metadata community or, we would venture to say, our user communities.

Not covering subject headings, but including *nature and scope of the content* will not make sense to those uninitiated in traditional cataloging. We need a document that looks--at the highest level--at what a whole bibliographic metadata record should be: general philosophy, element list, references to other standards. RDA development has already made such important strides towards this, that it is a shame for JSC to not go that last step. If RDA doesn't provide this top-level perspective, it is likely that others (most likely computer folk, not librarians) will, and RDA will be relegated to a lesser role in metadata circles. This is a golden opportunity for our community, and we should not hesitate to seize it.

0.1.1

FRBR should be covered here.

If one of the reasons we are keeping successive entry cataloging for serials is to be compatible with ISSN cataloging practices, that should be covered here.

0.1.3

Delete the superfluous second and third sentences.

0.1.5

Either use a title such as "Intended use", which would more accurately describe the content of this section, or merge this into 0.1.4, since it is about structure.

Instructional manuals and reference tools serve very different purposes. The tradeoffs caused by trying to be both kinds of document make RDA less successful at being either. We should focus RDA to be a reference tool--a document that establishes a standard. Training material should be developed separately.

0.1.6

This section should probably be deleted; this information is also given at other, more logical places in the document.

If this rule is retained, given that parts 2-3 are not available, we cannot fully evaluate this rule.

The last paragraph is a very long sentence whose meaning is unclear.

0.1.7

It would be helpful to differentiate options that allow additional information to be recorded (such as at 2.3.0.5) from those that would result in *different* data being recorded (such as at 2.3.7.3). From a cooperative cataloging perspective, the latter are a much bigger concern than the former.

0.1.8

Extend this section to include script preferences.

To facilitate broader sharing of records, specify that the cataloger record the language of the description, and each use of data in the language of the catalog needs to be treated as a separate data element so that automatic translation can be applied as records are shared throughout various language communities

0.1.9

The first paragraph should be deleted. All examples should completely conform to RDA. We should not have any examples at one rule that contradict instructions given at another rule.

Delete the superfluous second paragraph. At any example we can give a note to help provide context; this is normal English usage.

Chapter 1. General guidelines on resource description

Move information that is not instructions (this would seem to be 1.0 and 1.1) to an unnumbered introductory section.

1.0

Delete this superfluous section; it is just a textual version of the TOC.

1.1

Change the title to *Types of resources* (moving 1.1.4 out, as described below).

Delete the superfluous first two sentence. At least delete the parenthetical, as it is only makes sense for documents that are primarily used in a linear fashion.

Move the third and fourth sentences to the General Introduction, as they have scope for the whole document.

1.1.1-1.1.4

We applaud the splitting apart of the actual definition from illustrative and exemplifying text for *resource*. Please do the same for the other definitions.

It is unclear why it was decided to present here these particular terms, but not other terms used in the chapter.

Most of the bulleting in these sections is inappropriate. The text at those bullets is not logically subordinate to the first sentence of each section; the bulleting should be removed. The second through fifth bullets in 1.1.1 are indeed subordinate to the current first bullet, and their bulleting is appropriate.

1.1.1

Delete the superfluous first sentence.

The first bullet implies that some terms might be used differently in different parts of RDA. Please do not do that; use each term consistently throughout the whole document. The bullet also is an example of the textual bloat we referred to above. It could be reduced to just the word and its definition without loss of meaning or readability: “**resource**: the entity that forms the center of focus for a resource description”.

The definition of *resource* is not helpful; basically circular with the meaning of *description*. What is a resource? What a description describes. What is a description? Information about a resource. As the LOM and Dublin Core folks said at our CC:DA meetings in San Antonio, RDA needs to have a conceptual model of the resources it attempts to describe and give access to. It would seem easiest to use the FRBR group 1 entities. The document would be much tighter and more consistently understood if *resource* were replaced with *work*, *expression*, *manifestation*, and/or *item*, as appropriate. RDA needs to engender a common understanding on what it is that it describes. Can a person, for example, be described as a resource? What about other types of records that are currently in the MARC21 Community Information Format?

Resources exist whether or not there is a description of them. For example, the fact that we use a comprehensive description for a conference proceedings does not mean that the individual papers are not resources. This also arises when discussing other related resources. Also, the phrase “center of focus” seems redundant. The definition could at least be reworded as “an entity that is or could reasonably be the focus of a descriptive metadata record”.

Undescribed resources have the same variety of forms as those described; change “The resource described” to “A resource” in each the bullets.

The fourth bullet describes two subtypes of one of the types described in the previous bullet. Either combine into a single bullet, or indent this bullet under the third one.

The fifth bullet phrase “after the fact” begs the question of after what? The sentence is fine without that phrase. And technically someone could assemble a collection before its components are published.

1.1.2

We like that the draft deals explicitly with intangible resources, but we don’t think “logical units” will be readily understood by the average RDA user.

Another opportunity for us to be more user-centered is to change the focus of these definitions. We believe that users perceive the content of resources via attributes of work and expression, not attributes of manifestation. We currently distinguish between serials and integrating resources based on how the manifestations are issued. Our users would be better served if instead we distinguished on how new content is intended to be used. It doesn’t matter to them whether the manifestation of the *Encyclopedia of Associations* is successively issued or integrating; it is the fact that the content is kept up to date that matters.. Redefine as follows (changes underlined):

resource issued in successive parts

change from: a resource that is issued in a succession of discrete parts

to: a resource whose content is issued in a succession of discrete parts

integrating resource

change from: a resource that is added to or changed by means of updates that do not remain discrete and are integrated into the whole

to: a resource whose content is added to or changed by means of updates that do not remain discrete and are integrated into the whole

The first and third bullets include the word “issued” in their definitions. This seems to leave out assembled collections. We need either to define *issued* broadly, or change the wording to something like “issued or assembled”.

There is a lack of parallelism in the terms and definitions; I’ve made specific suggestions below.

first bullet

The definition given in the first bullet would include a 1-issue serial. I’m guessing that was unintentional?

The term described is rather long; *unitary resource* would be shorter.

Different RDA users could reasonably interpret the definition to either include or exclude single-volume non-updating loose-leaf material. The individual leaves may be seen be some as separate physical units. And some of these resources ship with the pages shrink-wrapped separately from the binder, definitely separate physical units. How about changing “physical” to “cohesive” (“cohesive” could include the web “logical units”)? Or changing “issued either as” to “issued in a form intended to be used either as”?

second and third bullets

There is still a need for an umbrella term for the types described in the second and third bullets. We suggest that we standardize on *multipart resource*.

The terms in the second and third bullets are unnecessarily non-parallel. Using *simultaneously issued multipart resource* and *successively issued multipart resource* would achieve worthwhile parallelism.

second bullet

Excluding the exemplary parenthetical, the definition reads “a resource comprising two or more physical units or, in the case of an intangible resource, two or more logical units.” That would include resources issued in successive parts, which does not seem the intent, given the phrase “issued as a set” in one of the parenthetical examples, and the third bullet. The definition needs to include wording such as “issues as a set” or “together”.

Other types of resources that need to be dealt with include multipart integrating resources, and serials whose issues are themselves multipart (e.g., an annual 3-volume directory).

1.1.3

This section is only about successive resources; it is illogical to include simultaneously issued resources here.

It would be worth clarifying either here or at 1.1.2 that integrating resources may be intended to be completed within a finite number of iterations or have no predetermined conclusion.

1.1.4

The value of this section at this location is unclear. Merge unique content into 1.2 and delete the rest.

second bullet

The term *analytical description* is unnecessary cataloging jargon. Rename the concept *component description*.

Change “a part of a larger resource” to “a resource which is part of a larger resource” to emphasize that the object of an analytical description is still a resource in its own right.

third bullet

This definition could be seen to include a contents note on the record for the larger resource. This is another reason to forego this use of the term *description* for the term *record*.

We need to make clear whether a multilevel description can include an analytical description of only one or some of its parts, or whether it must include analytical descriptions of *all* its parts.

1.2

We would suggest deleting this whole section, and revising other places in the text where these types of descriptions are mentioned. These concepts add unnecessary complexity to the rules for little benefit.

If this section is retained, pluralize both nouns in the title: *Types of descriptions*.

1.2.1

Move the content of the second bullet to 1.4.

1.2.2

Move the content of the third bullet to 1.4.

1.2.3

Move the second bullet to Appendix D.

1.3

Transform this section into a discussion of the relationship between resources and descriptions/records. 1.1.1 and 4.10 imply that when RDA instructs that two descriptions be made, that you have two resources. Sections on reproductions imply that each description describes one manifestation. Whatever is intended, make it explicit.

There are cases where multiple descriptions required by RDA (such as some serials that change title) are not multiple resources in users minds; the scope of a description/record should be tailored to users' expectations not our convenience.

It is not clear whether the draft allow for the highly-used and pragmatic single-record approach, which utilizes a single record for multiple entities in certain instances. This approach needs to be sanctioned in order to reduce user confusion and realize cost-effectiveness in cataloging.

Some of us still support a return to latest (or even earliest) entry cataloging for serials, but if you keep it, it needs to be justified by principles and explained.

Given that parts 2-3 are not available, we cannot meaningfully evaluate b).

Generate principles for handling changed information, and describe those here; only have specialized "Change in ..." sections when there is a real need to deviate from the general instructions.

1.4

Delete the superfluous first sentence.

The second sentence is unclear: these are mandatory according to RDA or to FRBR?

It would be clearer to replace the text, footnote, and option for statements of responsibility with: "Statement of principal responsibility, or controlled access point for such". Similarly, replace the text and footnote for publisher with just: "First publisher, distributor, etc."

Delete the superfluous first and third bullets.

second bullet: Delete "bearing similar identifying information"; this is an example of unnecessary book-centrism we referred to earlier.

In addition to mandatory-ness, also give the other aspect of cardinality, namely repeatability.

In addition to the categories of *mandatory* and *optional*, also have *mandatory if applicable*, *mandatory if known*, *mandatory if readily available*, and *if considered important*.

Given this section, it is unclear what *optionally* means in some other sections. If it is not on this list, it is by default optional, right?

Given that we currently use predominant usage in resources as the chief method for selecting the form of an access point, and that parts 2-3 are not available, we cannot fully evaluate the option.

1.5

You want the first bullet to apply even to non-transcribed data?

The option doesn't make sense as an option. What else would you do if you can't record the script used? Add that if you do this, record the fact that you only recorded transliterated data. Those of us who have experience in managing cataloging operations may want to have our cataloging system find specified bibliographic records that were missing vernacular, so we could add it.

Get rid of the *if* clause in the option. Even when libraries can record vernacular scripts, some may want to transliterate.

The last bullet is unclear.

1.6

Transcription is far less used in other metadata standards, and is likely a feature that would reduce wider utilization of RDA. 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.

Basically all resources that the library does not control that are available over the web are on some level integrating resources even PDF files can be replaced with corrected versions without any explicit indication of such. Quoting Diane Hillmann, "digital resources carry no such assumption of stability-change is part of the package. In that environment, relying on use of consistently transcribed information as the primary method of identifying a resource makes much less sense. Resources in this environment are most often unique, and usually identified by a numeric or alpha-numeric string."

first bullet: Delete: "as it appear on the source of information", "general", and the whole second sentence.

Reduce the second bullet to "*Optionally*, follow in-house guidelines for capitalization, numerals, symbols, etc."

1.6.1.1

first bullet: Delete the first parenthetical (and delete this same parenthetical in other rules, too). Change the second parenthetical to "(including an abbreviation)".

In a), change “do not capitalize the article” to “capitalize the next word rather than the article”.

Combine b) and c) and reword: “If the intent of the source clearly shows a specific use of case, follow the use of case in the source.” If b) is retained, change “secondary” to “second”. If c) is retained, remove the parenthetical; almost any string of characters can be part of some Internet address.

Delete the superfluous second bullet.

1.6.1.2

Delete this section. We should leave case as is for these data elements.

1.6.2

Delete the option, or at least define *early printed resources*.

1.6.2.1 second bullet, 1.6.2.2, and 1.6.2.3 should all be optional.

1.6.2.4

We don't understand what this rule is saying.

1.6.3

Simplify the *if* clause to “When modifying capitalizing according to 1.6.1”. Add “if known” to the end of the sentence.

1.6.4

In the second sentence, change “if necessary” to “when helpful.”

1.6.5

The rule name includes “acronyms”, but the text of the rule does not apply to acronyms.

Refer out for guidance on spacing for cataloger-transliterated text.

1.6.6

Delete this section, or revert to current AACR2 text. The rule as written here is unhelpful to users. Also, publisher's metadata will provide the title as it is intended to be read, not the creative graphical layout.

In the heading for this rule (and elsewhere in RDA), change “letters or words” to “characters”.

1.6.7

We like the parenthetical in the first bullet, but it should be optional, as it doesn't seem to be of much benefit to apply it machine-generated or shared metadata.

Delete the “as applicable” phrase in the first bullet, and the entire superfluous second bullet.

1.7

Change the opening clause to “When instructions in part I specify”.

1.7.1

Delete this rule. This is a presentation issue, not a data issue. And this is the kind of rule that makes non-cataloger librarians as well as other metadata communities roll their eyes in disbelief.

1.7.2

Add “If considered important,” to the beginning of this rule.

Refer to 1.6 for instructions on how to transcribe quotations.

1.7.3

This rule seems out of place here. It is more about the content of a note than how to formulate one.

Change the name of the rule to “Further information”. Change the text to “When known and considered to be important, refer to sources of further information about the resource.”

1.7.4

Since chapter 9 is not yet available, we cannot fully evaluate this rule.

Shorten the name of the rule to “Notes citing other works, expressions, or manifestations” (and use this wording elsewhere as applicable).

Delete the parenthetical in the first bullet.

1.8

Move to a chapter 0 with scope over all three parts.

Reword the text; it is unclear what you are trying to say.

Given that parts 2-3 are not available, we cannot evaluate this rule in any meaningful way.

Chapter 2. Identification of the resource

Change the name of the chapter to *Metadata for finding and identifying the resource*.

A closer adherence to the FRBR entity model would be helpful here. Specify which entity a data element relates to. For example, a title can be for a work (in its original language), an expression (a translated title), a manifestation (a reproduction of another manifestation, with a

new title page, as in some NTIS reports), or an item (manuscript names). This would go far to decrease confusion and increase consistency.

Since they provide guidance on general issues about identification rather than describe data elements, 2.0-2.2 should be merged together in 2.0.

There would be benefit to having a general section on notes overall in 2.0, then reducing text on notes in the rest of chapter 2. Also, there would be value in adding a section 2.15 on other notes relating to identification not covered in the rest of chapter 2.

2.0

The first and second paragraphs should be a single paragraph.

Delete the superfluous third paragraph here, and elsewhere in the draft.

2.1

Consider merging this section with 2.2; the difference between *basis* and *source of information* is neither clear nor clearly helpful.

It would seem that either such a section should appear in all of the chapters 2-6, or that it should appear in chapter 1.

Basis seems to be used in a technical sense, and should be defined.

Why is multilevel description left out here?

Delete the superfluous first bullet

2.1.1

Delete the superfluous second bullet.

2.1.1.1

first bullet (and in 2.1.1.3): It is unclear what the phrase “as appropriate” is supposed to be saying to the reader. In a) the phrase “sequentially numbered” is not clear; do you mean “consecutively numbered”?

The second and third bullets might be usefully grouped under a heading *Exceptions*, as you have done elsewhere.

Delete the superfluous last bullet, and others like it, or move the text in 2.14 to 2.1.

2.1.1.2

In the first bullet, replace the definition “a resource ... site)” with just “integrating resource”.

2.1.1.3

It is not clear what is meant by no “separate” source of information.

Delete the superfluous “as applicable to the type of resource being described.”

In b) iii), it is unclear what is meant by “a part that serves as a unifying element for the resource”.

Delete c) in favor of broadening a) and b).

Either here or at 2.14, consider having the cataloger record a note providing the source(s) used.

2.2

Sources of information and *basis* are really transcription issues, so should be integrated into 1.6.

If you feel that the source of information is really quite important, then instruct that it be recorded for all transcribed data.

2.2.1

We don't see the value of continuing to use “preferred” with “source(s) of information”.

Instruction is needed at this rule for cases in which more than one of 2.2.1.1-2.2.1.4 apply, such as an atlas with descriptive text or an art book with commentary.

The footnote does not adequately delineate what is and is not to be considered part of the resource. This definition would seem to imply that for a monograph consisting of a 3-ring binder with loose-leaf pages, the binder would not be considered part of the resource. Perhaps add a phrase such as “not intended to be used with the primary content of the resource”.

Delete the superfluous second bullet.

2.2.1.1

Either here or at 2.14, consider having the cataloger record a note providing the source(s) used.

The first bullet needs to account for cases (most commonly found in children's literature and art books) where a single “title page” is spread over 2 physical pages.

2.2.1.2

We think “still images” would be clearer than “graphic images”.

The direction given in this section does not seem to be any different from that given in 2.2.1.1, so it should be merged in there.

2.2.1.3

Broaden the text in the first and second bullets (and in 2.2.1.4) to “use eye-readable information on the storage medium or integral housing” (taking terminology from the 2.2.1 footnote).

Replace the text in b) in the second bullet (and in 2.2.1.4) with “encoded metadata”.

Delete the third bullet and others like it in later sections of 2.2 to a new rule at the end of 2.2.

Shorten the opening phrase to “For other resources,”.

2.2.1.4

It is unclear whether resources which are web pages/web sites are intended to be covered here or in 2.2.1.1.

2.2.2

We think this would be easier to use if it were merged into 2.2.1.

It is not clear what the cataloger should do if more than one of a)-c) apply.

It is not clear what the cataloger should do in a) 1) if there are translations into multiple languages.

In a) iv), have the cataloger select English if available, otherwise pick the first language. Setting global preferences for specific non-English languages does not serve our users well; libraries should be able to determine their own preferences.

The name of c) would be more readable as “Preferred sources of information for a reproduction and its original”.

Regardless of what c) says, many US libraries will continue to catalog based on the original, which many of us believe to be the better approach, and is more closely aligned with FRBR. Either change c) to match this practice, or allow it as an option.

2.2.3

The phrase “information required for the identification of the resource” is not clear. Do you mean if you find no such information in the resource or element by element? Do you mean any kind of identification information, or just those given in the rest of the chapter as data elements?

We need to see the definition of *accompanying material*. We don't think that most catalogers consider an “about” file to be accompanying information. (Yes we realize this is in AACR2 now; it has been confusing there as well.)

Either here or at 2.14, consider having the cataloger record a note providing the source(s) used.

2.2.4

The issue here is to identify the source of data when it is outside the resource. We should instruct the cataloger simply to indicate this in a note. Square brackets are a presentation issue, and should not be mixed up with the data, and all instructions to use them in RDA should be removed.

2.3

Since *title* per se isn't an element, the name of this section would be better pluralized: *Titles*.

2.3.0.4 and 2.3.0.5 are labelled "Names of persons and corporate bodies" and "Introductory words, etc." respectively. These would be more helpful if merged, under the rubric "Determining the title".

2.3.0.1

Keep definitions as brief as possible, giving explanatory or illustrative text after the definitions themselves. Change the definition of *title* to "one or more characters that names a resource." Words and phrases are groups of characters, so they do not need to be listed explicitly. If deemed helpful, the phrase could be worded "one or more characters (a word, a phrase, etc.)", or this information could be given in the next bullet. The phrase "normally appearing in the resource" is another example of book-centrism. A title of "a work contained in" the resource being described is not a title of the resource, but the title of a child resource.

Broaden the second and third bullets to be less print-centric, especially explicitly covering Internet resources.

Delete the superfluous fourth bullet.

2.3.0.2

This kind of information would likely be most usable in a table format rather than plain text.

Delete the superfluous second bullet.

2.3.0.4

The first two bullets might be more helpful at 2.3.0.1

2.3.0.6

This should be generalized and move to 1.6.

2.3.0.7

We think it may be time to get rid of this rule. There are too many ways that we currently treat various parent/child resources: common/section title, series, uniform titles and qualifiers, contents and other notes, etc. It is not serving our users well by utilizing all these different methods. The instruction given in this rule is based on whether or not the two titles are

presented in the same source and the grammatical relationship between them. This is an example of RDA's resource focus rather than user focus. It is extremely unlikely that any user coming to the catalog will have the remotest clue about whether the two titles are presented in the same source and the nature of the grammatical relationship between them. Perhaps it is worth keeping the rule, but altering its scope to child titles containing only numbering (as in the "Faust. Part one example), regardless of presentation on the source of information. This would have the cataloger using judgement (which we keep saying is a good thing!) as to whether she saw two titles (such as *Journal of the American Leather Chemists' Association* and *Supplement*) or one title (such as *Journal of the American Leather Chemists' Association Supplement* or *Supplement to the Journal of the American Leather Chemists' Association*).

The clause "if these two titles are grammatically independent of each other" shows a Western European/North American bias. In some languages, it is hard to figure this out, as there may not be case or prepositions. Even in English this is not always clear: why is "part one" grammatically independent in "Faust part one" but dependent in "History of the world part one"? Are the two parts of "Art of Advocacy Structured Settlements" grammatically independent or not? What does "grammatically independent" even mean? With my (Paul's) linguistics background, I can tell you that there are many levels of grammatical connections, both within and beyond sentences. There are similar problems with other rules that refer to grammaticality.

If retained, this rule should allow for and show example of titles with more than 2 levels.

In the second bullet, change "is preceded by" to "also has". Different languages have different traditions about where the numbering appears. Even for English, we should not care about the precise location of the numbering.

Generalize the third bullet and merge into the first bullet.

The last bullet is an example of inappropriately putting Representation over Responsiveness to user needs.

2.3.1

We like the idea of grouping rules into easy-to-understand categories *Choosing the title proper*, *Recording the title proper*, and *Change in the title proper*. However, 2.3.1.2 and 2.3.1.9, and 2.3.1.10 belong in *Choosing the title proper*.

2.3.1.1

Renumber this non-rule text 2.3.1.0; treat other non-rule text throughout the text analogously.

This section (and others like it throughout the draft) might be better labelled *Terms* or *Terminology*, as it covers more than just definitions.

The term *title proper* is very much cataloger jargon, especially with the adjective following the noun. Change to a term such as *primary title*, *citation title*, or *chief title*.

Delete “For purposes of description,” from the second bullet in this rule, and elsewhere throughout RDA.

We should stop treating alternative titles as part of the title, but as the variant titles they are intended to be instead, as this would likely better match user expectations. As others have pointed out, we are inconsistent already, in that we capitalize alternative titles, and generally exclude them from uniform titles.

Delete the third bullet.

2.3.1.2

Delete this superfluous section.

2.3.1.3

Delete the superfluous “written, spoken, or sung”.

Delete the superfluous last sentence.

2.3.1.4

The name of the section and the first sentence use different terminology. Pick either “title in two or more forms” or “more than one title”.

It is not clear what is meant by “the most comprehensive title”.

Delete the superfluous last sentence above the exception.

Delete the exception (or delete the main rule). We should not treat serials differently from other resources.

2.3.1.5

Delete the second bullet. Data should be recorded as what it is. If there is a text string that seems to be a subtitle, record it as such. If you also find out that that is the title of the original, record it again as the title of a related resource (as instructed in 4.10.2).

Delete the superfluous third bullet.

Consolidate all sections like this one into one section in chapter 0 or 1. Having all the separate sections makes it seem there are separate principles requiring separate instructions.

2.3.1.6

Delete this whole superfluous section.

2.3.1.7

Delete the superfluous first sentence.

Broaden a) to all resources.

In a), change “may or may not be” to “is or is not”.

Either broaden the scope of b) to include multipart resources, or delete the rule.

2.3.1.8

This is an example of a section is not really a rule. That is, if the section were removed, the description of the resource would not change. This is really explanatory text that would be helpful in training. Move all such text here and throughout RDA from RDA itself to a companion training manual. This will greatly tighten and shorten the document, and make it more palatable to other metadata communities.

If kept, relabel b) as *Cartographic scale*.

2.3.1.9

In the second bullet, it would be helpful to clarify whether the listing of titles proper of child works itself constitutes a title proper of the resource being described, or whether you are saying the resource being described does not have a title proper of its own.

The second and third bullets should be “or”ed together; that is, the cataloger should be able to select either method she feels works best for the resource being described.

Delete the superfluous fourth bullet, or at least merge it into the second bullet.

2.3.1.11

In b), change the practice for minor changes to match that of integrating resources, namely latest entry.

2.3.1.12

Change the name of the section to *Major and minor changes in titles of serials*.

In a) ii), the phrase “that changes the meaning of the title” is not clear, as it has not been in the recent iterations of AACR2. For example, if a title change from *Higher Education Resources in Australia* to *Higher Education Resources in Australia and New Zealand*, has the “meaning of the title” changed?

Without seeing parts II and III, we cannot evaluate a) iii). What is meant by “different corporate body”? Are the earlier and later names of a body to be considered different bodies? If the change moves up or down in a corporate hierarchy (for example, from *Association for Library*

Collections & Technical Services to American Library Association), is each level considered a different corporate body?

From a rule perspective, b) should be removed. It does not change anything if it were removed. It would be best moved to a training manual. It should at the very least be abridged.

Do not put long lists in running text, use bulleted lists or tables instead. This would help readability, for example, at b) i).

2.3.2

We do not see the value of continuing with the distinction between “parallel” information and other variants. Encoding the language of a title, whether “parallel” or “variant”, would gain us more than treating them differently Merge 2.3.2 with 2.3.4, and do likewise with other sections on parallel information. At the least, consolidate and simplify all instruction on parallel information, and move it to chapter 0 or 1.

Structural metadata is needed to indicate relationships between parallel titles and their statements of responsibility, etc..

2.3.2.1

The definition of *parallel title* contradicts the definition of *title proper*.

The second bullet is not clear.

2.3.2.3

The last bullet is unclear. What does “etc.” refer to? “Appropriate” for what?

2.3.2.4

The value of this rule is unclear. It seems that the cataloger would do the same thing, based on the rest of 2.3.2.

2.3.2.5

Since a)-c) are so similar, merge them into one.

2.3.3

Change the term *other title information* to *subtitle*. We should stop recording non-subtitle information as if it were, such as location and date of a conference.

2.3.3.1

As in AACR2, “in conjunction with” is not clear.

Delete “and is subordinate to”. This is not wording now in AACR2, and would negatively affect the usefulness of this data element.

In the second bullet, simplify the text to “... with a title that is indicative ...”.

Delete the superfluous third bullet.

2.3.4

Change the name of this section to *Other title*.

2.3.5

Multipart resources need to covered in this section.

2.3.6

Generalize this section and rename it *Standard title* or *Standardized title*.

2.3.7

Split this section up and integrate the parts into 2.0-2.3.6

2.3.8

Change the name to *Notes about titles*.

2.3.8.1

This is standard English; do not give a definition.

2.3.8.4

Given that parts 2-3 are not available, we cannot meaningfully evaluate the option.

2.4.0.1

This appears to be standard English, so no definition is needed.

Delete the superfluous second bullet, or move to a training manual.

2.4.0.3

Given that we currently use predominant usage in resources as the chief method for selecting the form of an access point, and that parts 2-3 are not available, we cannot fully evaluate the option.

2.4.0.5

The first bullet (not including the option) is another example of text that is not really a rule. Move it to a training manual.

In the option, give also the American term *ellipsis*.

Broaden the second bullet to include consortia, etc., of corporate bodies.

2.4.0.9

Delete the superfluous first bullet.

Delete the second and third bullets; this should be left to cataloger judgement.

2.4.0.10

Delete this section; leave to cataloger judgement.

2.4.0.11

Incorporate into 2.4.0.1.

2.4.0.12

Incorporate into 2.4.0.1.

2.4.1

This is not sufficient to indicate which statements of responsibility go with which parallel title. We need to deal with internal structural metadata to indicate such relationships.

Move the type of information (here and elsewhere) in the second bullet and the option to 1.4.

2.4.3

Move 2.4.3.7 up to be the first real rule in this section. 2.4.3.3-2.4.3.6 are all just examples of 2.4.3.7, not rules that require something different; move them to an instructional manual.

2.4.3.1

This is all normal English; delete.

2.4.3.4

Provide a clearer discussion on intrasource relationships in an introduction or in chapter 0 or 1. That would obviate the need for the second bullet here.

2.4.3.7

It is unclear whether “they” refers to notes or to person, families, etc.

2.4.3.8

Delete this whole section; this should be in part 2 or 3.

2.4.3.9

Add a new bullet for single-part resources, for example, those with no collective chief source of information, at least for statement of responsibility.

Delete the superfluous second sentence in b).

2.5.0.1

Delete the current text (plain English, so no definition needed), and replace it with the definition(s) of *edition*.

2.5.0.5

A clearer discussion on intrasource relationships in an introduction or in chapter 0 or 1 should obviate the need for this rule.

2.5.1.3

Delete the superfluous first bullet.

Generalize the second bullet and move to chapter 0 or 1.

2.5.1.4

This contradicts the second bullet in 2.5.1.1.

It is unclear what the principles behind what gets listed in i)-viii).

2.5.1.5

Delete this superfluous rule.

2.5.1.6

Change all rules like this one to record the data also in the correct data element.

2.5.2

For sections that discuss a data element that is basically the same type of information as an already described data element, simply refer back to the other the section (in this case, 2.4), supplemented by specific instructions when truly necessary. In general we should not have the same type of information dealt with differently depending on what it goes with.

2.5.3

At least merge this with 2.5.2.

2.6

Thinking beyond ISBD, this section is in odd place; it interrupts the flow of information that will be supplied from many resources. It would seem more appropriate to move it to after section 2.9.

2.6.0.1

Broaden the definition of *numbering* to include all types of resources. Make this element mandatory only for serials.

2.6.1.1

This leaves out mixed numeric/alphabetic designation, such as. v. 4A.

2.6.1.3 & 2.6.2.3

Make the first and last numbering separate data elements, so that we don't record a hyphen. The hyphen is a presentation issue (look how silly the last two examples are in 2.6.4), and does not belong here.

If either the first or last issue is not available, allow an option to record it based on analogy with the issue(s) in hand, as in 2.6.3.

2.6.6

Move this to 2.6.0.X as an instruction on repeatability.

2.6.7.4

It is not clear how this rule relates to 2.6.1-2.6.2, since those rules do not mention not recording information as numbering due to complexity.

2.6.7.5

Move to chapter 4.

2.7-2.8

Guidance would be useful on how many levels up should be recorded. For example, imprint/division > publisher > publishing group, and city > state > country.

2.7

This whole section is too geared to resources from a Western European/North American publishing tradition, for example, the first bullet in 2.7.0.4

Without seeing how publishers, etc., will be treated in part 2-3, we cannot fully evaluate this section.

2.7.0.1

We applaud that definitions are now given for these elements, but defining a term structured as *X, Y, etc.* is not helpful. If there is a need for an explicit such concept, give it a name, perhaps *issuing body*.

2.7.0.4

The function of each "publisher, distributor, etc." should be recorded, including simple publishing.

2.7.0.5

Delete this whole section; just state that this element is repeatable.

The option seems to be the same as the first bullet in 2.7.0.4, so it's not clear why it's an option.

2.7.1.1

We applaud that we finally have a definition of publisher!

With this definition of *publisher*, it would seem that all resources (except possibly naturally occurring objects) are published, as they are issued or released in some sense. If you do not intend this to be the case, the definition needs work.

2.7.1.3

Generalize the second and third bullets for other data elements and move in chapter 0 or 1.

2.8

Structural metadata is needed to indicate relationships between publishers, etc., and their places.

The difference and relationship between manufacture and production is not clear. It would seem that in general they are synonymous, except from “production” of a moving image, which belongs in chapter 4.

2.8.0.4

We are glad to see the elimination of the criterion of what country you are cataloging in to determine which places to record.

2.9.0.1

It is not just any date associated with publication that should be recorded as date of publication; it is only the date the resource was published. Delete this definition; the meaning we are after is standard English.

2.9.1.3

Delete the first bullet, replacing it with instruction on mandatory-ness in 1.4 and 2.9.0.

Generalize the second bullet on how to indicate approximations, and move to chapter 0 or 1.

2.9.3.1

This is a technical use of the word *phonogram*, so it needs to be defined.

2.9.3.2

Make sure that the examples for copyright dates match the rule. That is, do not include the *c* or *p*. This is a presentation issue, for which the actual copyright symbols should be used when possible.

A clearer discussion on intraresource relationships in an introduction or in chapter 0 or 1 would obviate the need for the second bullet.

2.9.5.1

The second and third bullets need to appear also at 2.7.2.1 and 2.8.2.1.

2.9.5.3

This rule should be expanded to cover all resources.

2.9.6.3

Treat dates of recording and original as separate data elements.

2.10

Series is really just a parent resource. Series should probably not be dealt with in part 1, but in part 2, since that part deals with relationships. Given that part 2 is not available, we cannot meaningfully evaluate this section.

2.10.1.3

Delete the second bullet; this is not helpful to users or other library staff.

2.10.5

Delete this whole element, and deal with it in part 3 instead. It does not belong in the bibliographic record for series analytics.

If this element is retained, broaden it to include other standard numbers. When a series is a multipart monograph rather than a serial, an ISBN may be available.

2.10.6.3

Use the term *caption*.

2.10.6.4

We support the recording of chronological designations in all cases, not just as an option.

2.10.6.7

Allow a) as an option for serials.

2.10.7

For the most part, just refer back to the rest of 2.10, retaining here only necessary instructions that are truly specific to subseries.

2.10.8

Simplify this to a simple statement on repeatability.

2.10.9.3

It is unclear what the intent of this rule is. The example is not “too complex to be recorded as structured series information”.

2.11

Indicate in the header that this data element only applies to resources issued in multiple parts.

2.11.0.3

It is unclear why the first bullet says “make notes on ...” as this element is not a note.

The second bullet (to be consistent with other data elements) should be a separate rule.

2.12.0.1

Delete the superfluous second bullet.

We do not see the value of limiting the definition of *standard number* to ISO standards.

In the fourth bullet, do not use the term *document* to mean *resource issued by a governmental body*, as this is library jargon, not in general use.

2.12.1.3

Parentheses are a presentation issue, and should not be required here.

2.12.1.4

Add “of the same type” to the end of the first sentence.

Delete the second sentence; this data does not need to be standardized.

Delete the third bullet. This information has absolutely nothing to do with the standard number. If deemed important, it should go elsewhere.

2.12.2

Do not have both 2.12.2.1 and 2.12.2.3. Pick one method, and apply it to all resource types.

2.13.0.3

Make clear that the footnoted document is not the only document that might supply a “common form of citation”.

Chapter 3-4

Merge and name the combined chapter *Metadata for selecting the resource*.

Chapter 3. Technical description

[Comments on this chapter and the GMD/SMD report will come later.]

Chapter 4. Content description

If this remains a separate chapter, rename it *Metadata for selecting the work and expression*.

The text in this chapter muddies the water between notes and other data elements. Decide whether the such elements as *nature and scope of the content* and *intended audience* are notes or not, and edit the text to be consistent with that decision.

Since 1.4 only lists two chapter 4 elements as mandatory, it is unclear why some of the rest are explicitly labelled as options (such as *system of arrangement*), while most are not.

It is not clear what the relationship is between *content* on the one hand and *work* and *expression* on the other.

4.0

Using the FRBR terms *work* and *expression* would be helpful here.

4.3.0.3

This rule as written would require a note in many more cases than happens in current practice. The “unless clause” is unclear.

4.4.1

Replace this rule with a simple reference in 4.4.0.1.

4.5.0.3

This seems reasonable, but we do note that it will require a note in many more cases than happens in current practice.

Is the intent to include such phrases as “for mature audiences” and “for the curious kid in all of us”?

4.6

Revert to *summary*.

4.6.0.3

This rule as written would require a note in many more cases than happens in current practice. Writing summaries takes a significant amount of time. It would seem that this should clearly be an option.

It is unhelpful to use the phrase “unless ... provides enough information” without saying enough of what?, or for what?, or in order to what?

Delete the second bullet; it is unimplementable. Instead, elsewhere say to indicate aspects of a resource that are intended for use by persons with disabilities.

4.7.0.3

Require the cataloger to indicate whether a provided contents list is complete or not.

Structural metadata is needed to indicate relationships among metadata in a contents list.

The second bullet (on comprehensive descriptions) is unclear.

4.8

It is unclear whether the intent that this element only be applicable to assembled collections or not.

4.9

The intended difference between this section and 4.10.1.7 is unclear.

Broaden this to something like *assistance resources* to include glossaries, user manuals, etc.

4.9.0.1

Change “a file, document, or group of documents” to “one or more resources”.

4.9.1

Merge this into 4.9.0.3

4.10

Without parts 2-3, we cannot fully evaluate this whole section.

4.10.0.3

“Bibliographic history” is not necessarily related to the content of a resource, so that phrase should be removed from the rule.

4.10.1

I’m glad to see the broadening of this type of relationship information from continuing resources to all resources. However, the rules as written will require many more notes in records for monographs. For example, this rule would require such notes to be made between editions, including on the pre-existing record, even if the title and author stay the same. It seems that that should perhaps be optional.

4.10.1.0

Delete this superfluous rule. At least delete “readily” to be consistent with the rest of RDA.

4.10.1.4

Merge this into 4.10.1.2.

4.10.1.5

Change “previously published” to “previous”.

It is unclear what the second bullet is supposed to be saying.

4.10.1.6

Merge into 4.10.1.5.

4.10.1.8

This is much too broad. Many resources are issued with other resources in some fashion or another: as a “free gift”, from marketing/PR reasons, etc. Clarify your meaning here.

4.17

Broaden this as a generic spot of all other information, for all types of resources, and move to the end of the chapter.

4.18

Broaden this section to include other resources that fulfill educational requirements.

Treat each piece of information (fact that the resource is a thesis, degree, institution, year) as separate elements, as is done in chapter 2.

Delete instruction on punctuation; this is a presentation issue.

4.19.0.1

Delete, as this is standard English.

Chapter 5. Information on terms of availability, etc.

Change the name of the chapter to *Metadata for obtaining the resource*.

Instruction on recording URLs, etc., is needed.

5.3

Move this whole section to part 2-3.

5.3.0.1

In the second and third bullets, change the introductory phrases to “For generally available resources” and “For unique resources”.

Chapter 6. Item-specific information

If this remains a separate chapter, rename it *Metadata for the item*.

6.2

All the data elements in this chapter are “details of the item being described”, so that phrase needs to be changed. If nothing else, move it to the end of the chapter and use the phrase “other information about the item”. Another option is to use the phrase “attributes of the item”, as the other data elements are attributes of a relationship between an item and a FRBR group 2 entity.

6.2.0.3

In the third bullet, change “after receipt” to “after issuance”. Many libraries have resources bound, etc., before they actually receive them.

6.2.1

This is just particulars of the first bullet of 6.2.0.3, so move it there.

6.3

The relationship between 6.3.0.3 and 6.3.1 is unclear.

6.4

This data element can also apply to works, expressions, and manifestations. Move this section to, or duplicate it in, chapter 5.

6.5

This data element most often applies to works and expressions, not items, and it can also apply to manifestations. Make this section its own chapter, named *Metadata for using the resource*. (This data does not primarily support any of the four current FRBR user tasks.)

6.6

Broaden this section to all types of resources.

Appendix A. Capitalization

Consolidate all capitalization instructions here rather than spreading them throughout many separate sections.

Appendix B. Abbreviations

Consolidate all abbreviation instructions here rather than spreading them throughout many separate sections.

Appendix D. Presentation of descriptive data

It is unclear why a single appendix for parts 1-3 isn't better than separate ones.

D.1.1

We like the ISBD table.

D.1.2

Reduce this down to just a reference to the ISBDs. We shouldn't try to reproduce this here.