To: Joint Steering Committee for Development of RDA

From: Kathy Glennan, ALA Representative

Subject: Simplification of RDA 2.7-2.10. Follow up

ALA thanks the BL rep for this proposal to remove the Optional Addition from the instructions for *Statement of Function* in relation to produced, published, distributed and manufactured resources. While we sympathize with this proposal, in that RDA has catalogers record this information in an instruction captioned "statement of function", we are concerned that removing the Optional Addition would create a greater disparity between RDA and ISBD. Indeed, ISBD 4.2.5 states:

> *Words or phrases indicating the function (other than solely publishing) performed by the person or body are given. If only the distributor is named, this function must be given. When the names of both a publisher or producer and a distributor appear on a prescribed source of information, the name of the distributor may be given. When the name of the distributor appears on any other source, it may be given in area 7 (see 7.4.1).*

Clearly, no harm is done with the current RDA wording, which allows catalogers to add a statement of function for clarity. We do not believe that the JSC should remove this optional addition from the affected instructions without consultation with the ISBD Review Group. However, we note that changes to 2.7.4.4 are not affected by ISBD compatibility. For our specific recommendations for rewording that instruction, see 6JSC/BL/26/ALA response.

We have treated the rest of this document as a discussion paper. ALA commenters have a mixed reaction to the possible "simplification" of PPDM statements. Some are strongly in favor of moving in this direction, while others disagreed with the entire approach. The span of these responses indicates the challenges the JSC faces in moving RDA forward to coincide with anticipated changes coming in the FRBR-LRM while catalogers still work with encoding systems (such as MARC21) that cannot accommodate this approach. Many in the cataloging community have only a vague understanding of application profiles and how their development and use will mesh with RDA as it currently exists. ALA recommends that the JSC undertake educational efforts to help bridge this gap as application profiles are developed and gain greater importance for RDA.

ALA offers the following comments on the issues raised in the BL rep paper, along with one other issue for discussion.

Issues raised by the BL Representative

Aggregate elements

ALA agrees that an ISBD application profile would be an appropriate place to put
instructions relating to the creation of aggregate statements for PPDM information. However,
we note the importance of having this application profile in place before removing and
rewording the instructions in the RDA text itself.

In relation to the orphaned dependent instructions related to the aggregated statements, ALA
commenters expressed no preference about how to restructure the RDA text. Although we
understand that the paper's Appendix B is a proof of concept, we observed a number of
editorial inconsistencies both within this paper and with the existing style of RDA. We raise
this issue simply to note the importance of engaging editorial assistance as significant
sections of RDA are revised to conform to the new FRBR-LRM.

Colophon and imprint

While ALA supports the creation of the suggested "colophon" and "imprint" elements, we
strongly disagree with the suggested element name in relation to unpublished resources.
"Colophon" is already used several times in its traditional sense in RDA, and extending the
definition to fit this situation is problematic. Another term should be selected instead –
perhaps just "Transcribed production information."

ALA observes that the paper continues the current RDA conventions to record multiple
"imprint" elements in the order indicated by various conventions on the resource, including
the possibility of multiple sources of information. While this consistency in practice is
welcome, ALA wonders if it is time to consider whether the source of transcribed elements
should be consistently provided for all affected elements, instead of just some of them.

Elements: Place, Name, and Date

As with the other orphaned elements, ALA commenters expressed no preference for how to
accommodate these in the revised text.

Place and Timespan entities

ALA supports the creation of Place and Timespan entities in RDA, to parallel the elements in
FRBR-LRM.

The implications for placement of the text within the existing RDA structure need to be
considered in light of any other significant changes being proposed to the RDA text in
relation to (or inspired by) the new FRBR-LRM. ALA recommends careful consideration of
all of the related issues in such an effort. Any serious renumbering of instructions will have a

significant and detrimental impact on catalogers who currently use RDA. This includes the need to update supporting documentation and training catalogers on RDA yet again.

Transcription of dates of publication, distribution and manufacture

ALA does not agree with changing the date associated with publication, distribution, and manufacture elements from "record" to "transcribe". The comparison table provided in section 3.5.2 of this paper highlights several of the problems with this recommendation, including the need to invoke RDA 1.7.3 to add punctuation for clarity. The entry "2.8.6.5/Block 1" in this table shows a single date being transcribed for a multipart monograph, serial, and/or integrating resource, which is clearly a misleading outcome.

Adding to our confusion about this recommendation, we observe that the revisions suggested in this paper's Appendix B (in 2.11.7) still have a primary instruction to "record" rather than to "transcribe".

Overall, ALA finds it difficult to fully assess the impact of such a change, since the ability to record a relationship between the manifestation and the Timespan entity is not yet developed in RDA.

Copyright date

ALA agrees with the paper's analysis that copyright date is an attribute of the Expression. However, we observe that there may still be a use case for capturing copyright information as an attribute of a Manifestation. After all, it is a piece of information that is actually found on a published item that helps identify the manifestation in hand. We believe that if copyright date is moved to the expression level instructions, the implications of recording copyright date could change in a subtle way. It might become more important to consult resources other than the manifestation in hand to determine the actual copyright date, and this could differ from what is printed in any given resource.

ALA has strong objections to conflating the copyright date © and the phonogram copyright date ℗ in a single copyright element, since these represent different types of copyright. If the JSC agrees to cease recording the symbol which indicates the type of copyright as part of capturing the copyright information, ALA recommends creating a new element (or sub-element) for phonogram copyright date.

Additional issue

Capturing information about the copyright holder

With such a detailed look at copyright date and where it should be modeled in RDA, several ALA commenters questioned why the same considerations are not being suggested for the copyright holder. This currently is prevented by RDA 0.2.3, which states that "attributes and

relationships (associated with the entities person, family, corporate body, work, and expression) whose primary function is to support user tasks related to rights management" are out of scope for RDA. Is it time to revisit this decision?

Comments on recommendations

Recommendation #1: JSC to consider re-designation of the 2.11 Copyright Date to Copyright Notice Date or Copyright Year

ALA has no particular preference about what to name this element. We have no concerns about the current name, which certainly is in common use in American English.

Recommendation #2: Future revisions of RDA should provide for the transcription of the Copyright Date

ALA's reaction to this recommendation depends on whether any aspect of copyright date will be captured as part of describing the manifestation. If copyright date will only be treated as an attribute of the Expression, then transcription would not be appropriate.

Recommendation #3: Specify Copyright Date or Date of Copyright as a relationship between Expression and Timespan

Agree; as noted above, it makes sense to model copyright date as a relationship to the expression. We assume that as Timespan is developed, there will be a way to do this.

Recommendation #4: JSC to discuss whether it is appropriate for the RDA instructions/element set to specify core elements, or whether core elements are community defined in application profiles

ALA believes that a base set of core elements need to be applicable to all RDA user communities and that the JSC needs to continue to identify those elements which constitute the basis of an RDA description. If an application profile is developed for a global RDA user community, then it would be acceptable to have the base set of core elements reside there. Under this scenario, specialized RDA user communities could add to the base set of core elements in their own application profiles.

Recommendation #5: JSC to consider formation of a Working Group on Timespan / Technical WG to consider appropriate place of Calendar

Agree.