

To: Joint Steering Committee for Development of RDA
From: Dave Reser, LC Representative
Subject: Simplification of RDA 2.7-2.10

Thanks to the BL for following-up on the discussion related to statements for production, publication, distribution, and manufacture. We did not prepare a separate response for 6JSC/BL rep/2/Appendix B so this response refers to content from that paper as well.

As noted in the table summarizing the JSC constituency responses to the two scenarios identified in 6JSC/BL rep/1, LC did not see either scenario in that earlier paper as an improvement to the current RDA text. Nothing in this paper has caused us to change that opinion.

General Feedback:

The paper identifies 4 “key features” in Section 3:

1) Removal of aggregate statements from the element analysis table and RDA instructions

Response: We do not agree with the removal of aggregated statements. It is stated that the construction of the statements are primarily driven by consideration of how the data should be displayed, which is true only to the extent that the constructed statements associate/related particular places with particular publishers, etc., and particular dates. These relationships are critical, as recording 12 different places of publication with 3 publishers involved becomes meaningless if the places are not associated with the correct publisher. This is important for fulfilling user tasks, but also tasks necessitated in the management of aggregations of bibliographic data that require this information for duplicate detection, use of descriptions in citation software, etc. In its response to 5JSC/RDA/Part I, ALA noted, “these data elements are meaningless unless they are interpreted within the context of other associated data elements” and “For multiple publishers, each must be related to the appropriate place of publication.” ACOC said in response to the RDA draft, “We note that by allowing multiple publishers, etc.; places; and dates; to be recorded in these elements, there is a need for each place and date to be related to the publisher, etc. to which they pertain.” Clearly, the importance of keeping these associated data elements together has been an issue for JSC constituencies for several years.

There are other elements in Chapter 2 that are aggregated statements, and this paper did not mention those—edition statement (2.5) and series statement (2.12). The reasons that these are aggregated statements are the same as for publication, etc., statements. When a resource has two series statements, each with numbering and an ISSN, then it is important to pair those sub-elements correctly.

2) Introduction of Colophon and Imprint elements for transcription of complete statements

Response: Information relative to PPDM sub-elements can be complex, because the information presented on resources can be complex, not because the instructions are. As noted in the earlier discussion, when information appears in various sources on manifestations, merely transcribing a simple statement from a resource is not possible. This paper does not address the very common issue of how to put the sub-elements of place, name, and date together when they are either found on different sources or found on the same source but not connected by language. Instead, it is focused on the idea that complete publication statements appearing on one source of information are being split apart, e.g., “Printed in Boston by John Smith under the sign of the shamrock during the year 1795.” However, it fails to address the issue of when information belonging to different elements is presented in one statement such as this combination of printer and bookseller’s names:

London,

Printed by *J.M.* for *Andrew Crooke*, at the Sign

of the green Dragon in Saint *Pauls*

Church-yard. 1663.

This was a concern LC attempted to address in 6JSC/LC/24 in 2013. The JSC did not approve this part of LC/24 because it was too complex, and the BL representative volunteered to draft a discussion paper on the issues, including statements of function. Unfortunately, we still lack a principled approach for how to handle a common presentation of information on rare book title pages, and we still do not have a way to handle these types of combined function statements, which appear in resources published today as well older materials: “Published and distributed by Minority Resource Network” and “Printed and published by J.W. Ingraham.”

Another issue raised by LC/24 that has not been addressed yet is the inconsistent approach to recording statements of function found on the resource for producers, manufacturers, and distributors, but not for publishers. Currently, the instructions for the sub-elements say to transcribe statements of function as found on the resource for producer, manufacturer, and distributor, but not to record a statement of function if it is “solely publishing.”

LC dislikes the notion that when one manifestation of a work has “Published by William Cobbett” and a different manifestation of the same work has “William Cobbett,” RDA 2.8.4.4 forbids catalogers to transcribe this statement of function that clearly helps users distinguish between the manifestations.

LC understands that many agencies might not want to transcribe statements of function found in the resource since the function is part of the element name. However, RDA should have a consistent approach for recording statements of function **found** on the resource for all four elements. If we recall the conversation about LC/24 correctly, none of the JSC members objected to allowing a cataloger to transcribe a publisher statement of function; the objection was to requiring it. (Note: while LC has advocated for the removal of the Optional Addition to **supply** statements of function not found on the resource because they are redundant, we continue to believe in recording found statements of function because they assist in the FRBR task of identification, not because they provide information not already given as part of the element name.)

Therefore, we are suggesting a change to 2.7.4.4, 2.8.4.4, 2.9.4.4, and 2.10.4.4 beyond what the BL has proposed. See Changes (section 5) in our response.

We also think that the use of “colophon” as a label is not appropriate. While the term has many definitions, its use in RDA at this point is for a purpose other than the intention of this paper. We do not agree to the changes proposed in Appendix B.

3) Generic instructions to record elements for Place, Name and Date associated with the manifestation.

Response: Because we feel that the statements still have importance, we do not see the advantage to the arrangement of the ‘orphan’ elements suggested by Appendix B. This approach was presented in 5JSC/RDA/Part I. This approach was changed, probably because of comments like ALA’s and ACOC’s (see page 1 of our response).

4) Place and Timespan entities

Response: As indicated in our response to 6JSC/BL rep/1, we like the idea of pursuing the entities for place and timespan as an additional technique for relating this information to manifestations. We are interested to see how this plays out in light of the FRBR-LRM model, and strongly support the concept.

Transcription of Dates of Publication, Distribution, and Manufacture (section 3.5)

We appreciate the presentation of the differences between “recording” and “transcribing” date information. RDA itself supports either recording or transcribing via the instructions and alternatives at 1.8.2. The ‘base instruction’ is to follow an agency decision, and not a basic ‘record’ or ‘transcribe’ instruction followed by alternatives for agency decisions to counter the base instruction.

This anomaly in 1.8.2 makes it difficult to present coherent agency decisions, or evaluate examples used in RDA, since the results are based on an unstated agency decision (e.g.,

in the third example at 2.8.6.3 the assumption is that the agency's preferred form of numerals is not roman numerals as found on the resource). We think revisions to the 1.8.2 instructions should be part of the discussion on recording dates as a relationship between manifestation and timespan, in addition to recording a date attribute. We agree that the two methods need not follow the same SES. Some thought might also be given to moving the "date" aspects of 1.8.2 (which is broader than dates, as noted by BL) to 1.9, as the separation has been a source of confusion.

RDA 2.11 Copyright Date (section 3.6)

The recommendations from the BL paper are:

1. JSC to consider re-designation of the 2.11 Copyright Date to Copyright Notice Date or Copyright year.

Response: We agree that RDA's Copyright Date is in fact the Copyright Notice Date from the manifestation (this distinction is noted in the MARC definition of 264\$c (Date of production, publication, distribution, manufacture, *or copyright notice*)). With this scope, we believe it truly is an attribute of the manifestation.

2. Future revisions of RDA should provide for the transcription of the Copyright Date.

Response: There could be more transcription (e.g., re-evaluate the connection to 1.8), and RDA should probably not interfere with transcribing either the copyright symbol or the word "copyright". This leaves us questioning the BL suggestion that the copyright symbol, when represented on the resource, should not be transcribed, as it seems to counter the principle of representation. We also believe that the copyright symbol © and the copyright phonogram symbol ® convey different meanings that are important to users.

3. Specify Copyright Date or Date of Copyright as a relationship between the Expression and Timespan.

Response: We think the use of the copyright date should be limited to the manifestation attribute referring to the copyright date notice on a manifestation. We do not think that RDA should take the further step to associate a work/expression relationship to timespan. As noted in RDA 0.2.3, attributes and relationships whose primary function is to support user tasks related to **rights management** are out of scope; this was confirmed in the discussion of 6JSC/ACOC/8 in 2013.

CORE designation of PPDM elements (section 4.4)

The recommendation from BL is:

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.

Response: As currently constructed, we think the core requirements in RDA are appropriate, but we are open to further discussion. Any discussion of other options (e.g., application profiles) needs to include information about how the decisions would be communicated within the *RDA Toolkit*. We think the user of the *Toolkit* will need to be able to specify which application profile they are using, so that the profile decisions would be displayed in the Toolkit in the same functional manner as the current “core” statements.

Changes (section 5)

The recommendation from BL is to delete the Optional Additions at 2.7.4.4, 2.8.4.4, 2.9.4.4, and 2.10.4.4.

Response: LC agrees with these deletions. However, we suggest 1) adding an *Optional Omission* to omit statements of function at all 4 elements and 2) deleting the phrase “(other than solely publishing)” in 2.8.4.4. The responses to removing this phrase when it was suggested in 2013 by LC/24 were: ALA, ACOC, and CILIP agreed; BL suggested an optional omission; CCC suggested an optional addition; and the DNB preferred to retain the phrase but to provide an Exception for rare materials. Because the importance of transcribing statements of function for a publisher is not limited to rare materials and in some languages it is much easier to transcribe the statement of function than to omit it and convert the publisher’s name into a different case, we do not believe DNB’s suggestion is feasible. However, providing an Optional Omission allows agencies to specify a decision like transcribing it for rare materials. Having examined existing RDA instructions (e.g., 2.12.8.3, 3.4.1.5, and 6.15.1.5.4) we believe that the best approach would be to provide an optional omission. This is what 2.8.4.4 and 2.9.4.4 would look like (we have not shown 2.7.4.4 and 2.10.4.4):

Mark-up version:

2.8.4.4 Statement of Function

Record words or phrases indicating the function ~~(other than solely publishing)~~ performed by a person, family, or corporate body as they appear on the source of information.

EXAMPLE

SAGE Publications on behalf of McGill University

Source of information reads: Published by SAGE Publications on behalf of McGill University
In Kommission bei Otto Harrassowitz

Published by the Noa Eshkol Foundation for Movement Notation

Optional Addition-Omission

If the function of a person, family, or corporate body recorded in the publisher's name sub-element is not explicit or clear, add a term indicating the function. Indicate that the information was taken from a source outside the resource itself (see 2.2.4).

Omit words or phrases indicating the function performed by a person, family, or corporate body.

EXAMPLE

Noa Eshkol Foundation for Movement Notation

2.9.4.4 Statement of Function

Record words or phrases indicating the function performed by a person, family, or corporate body as they appear on the source of information.

EXAMPLE

Distributed by New York Graphic Society

Sold by Longman

Distributed by Independent Publishers Group

Distribution by: MapArt Publishing Corporation

Distributed by Coach House Records Ltd.

Optional Addition-Omission

If the function of a person, family, or corporate body recorded in the distributor's name sub-element is not explicit or clear, add a term indicating the function. Indicate that the information was taken from a source outside the resource itself (see 2.2.4).

Omit words or phrases indicating the function performed by a person, family, or corporate body.

EXAMPLE

Guild Sound and Vision [distributor]

Voluntary Committee on Overseas Aid & Development [distributor]

Longman

Clean copy:**2.8.4.4 Statement of Function**

Record words or phrases indicating the function (other than solely publishing) performed by a person, family, or corporate body as they appear on the source of information.

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Source of information reads: Published by SAGE Publications on behalf of McGill University

In Kommission bei Otto Harrassowitz

Published by the Noa Eshkol Foundation for Movement Notation

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Omit words or phrases indicating the function performed by a person, family, or corporate body.

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EXAMPLE

Longman

Appendix A

We look forward to a discussion of how some of the broad entities in FRBR-LRM will be incorporated into RDA's existing structure.

Recommendation 5: JSC to consider formation of a Working Group on Timespan. Technical Working Group to consider appropriate place for calendar.

Response: We agree that discussion of these recommendations need to be prioritized with the JSC discussion of the FRBR-LRM.