

**To:** Joint Steering Committee for Development of RDA  
**From:** Kathy Glennan, ALA Representative  
**Subject:** RDA models for authority data

ALA thanks the JSC Technical Working Group for this solid and balanced paper that explores theory, explains different schema, and provides illustrative examples. We offer the following comments on the paper's recommendations.

**Recommendation 1:** RDA should represent sub-types of Nomen as element sub-types of the appellation element.

ALA agrees with this recommendation. We suspect that this approach will serve as a better transition from our historical treatment of data structures to the various encoding options available in the future.

**Recommendation 2:** Review and develop appropriate RDA elements for compatibility with the appellation-Nomen model by assigning element sub-types and ranges.

Agree.

**Recommendation 3:** a) Consider adding the RDA elements *family name* and *given name* as sub-elements of *name of the person*. b) Develop these for the RDA Registry in any case, to improve interoperability of RDA linked data.

ALA agrees with these recommendations. However, in relation to 3a, we note that *family name* and *given name* have not been part of RDA from the beginning, presumably for good reasons. While we don't object to 3b, this recommendation raises the question about the long-term vision for the relationship between the RDA Registry and the RDA instructions.

**Recommendation 4:** a) Investigate the functionality and utility of "preferred" forms of appellation element sub-types in relation to RDA and application profiles in the context of the appellation-Nomen model. b) Investigate the utility of relationships between Nomen and how RDA should accommodate them.

ALA agrees with these recommendations and notes that [6JSC/ALA/43](#) contains a proposed new section, Relationship Designators to Relate Different Names of a Person (K.3.4), which may partially address 4b.

**Recommendation 5:** The RDA instructions for constructing AAPs should be replaced with general guidelines for assigning *Nomens* for applications supporting the user task explore, as part of the development of guidelines and instructions for creating *Nomen* data.

ALA reviewers found this the most problematic of the recommendations. As noted in 6JSC/BL rep/2/ALA response, 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. We see the benefit in exploring Recommendation #5 from a linked data perspective, but ALA remains concerned about the potential long-term result of the RDA instructions becoming so general that the “real” instructions reside only in various application profiles. Obviously, before removing the RDA instructions regarding the construction of AAPs, there must be a relevant application profile for them to move to. Catalogers will need to know how to access and apply these guidelines, regardless of where they are found. Who will be responsible for creating and governing these various application profiles?

***Recommendation 6:*** The development of RDA guidelines, instructions, and elements with respect to entity labels, identifiers, and access points should be carried out in consultation with other cultural heritage communities.

ALA agrees; this is necessary in meeting the RDA development goals established by the Committee of Principals.