To:　　Joint Steering Committee for Development of RDA

From:　Dave Reser, LC Representative

Subject:　Place as an RDA entity

Because LC had difficulty understanding the intention of this document, we struggled to respond to it. Although it is not numbered as such, we assume this is a discussion paper since it calls itself that in the introduction. Our response is based on that assumption. The introduction states,

> "This discussion paper does not contain any formal proposals or recommendations. It is intended to assist the JSC in developing RDA as a standard based on principles; specifically the domain conceptual and data models with which RDA is aligned. This paper includes an illustrative draft of a chapter of RDA focussing on the entity Place."

While the paper seems to present a draft chapter on Place, the content of instructions often seems to be lifted from other RDA instructions without reworking them to another context. This leads us to believe we are being asked to comment more on the model of the chapter rather than the content itself. We reviewed the tasks for the JSC Places Working Group (see 6JSC/Chair/12/2015) and their charge (see 6JSC/Chair/12), and we concluded that a document with this purpose might be better submitted by the TechnicalWG. As stated in 6JSC/Chair/11, the TechnicalWG is to "assist the JSC in developing RDA in technical areas such as models, structures, and standards." It seems more appropriate for the Places WG to develop content based on the current structure of RDA and refer modelling ideas to the TechnicalWG (see task #2) for broader analysis. Therefore, we suggest that future discussion papers on modeling and conceptual issues would be more appropriately issued from the Technical WG, which is best suited to address these issues.

Our response is organized in three parts: I. the instruction set model, II. further development of chapter 16, and III. the content of the instructions.

I. Instruction Set Model

Regarding the format of the draft, we have seen a version of this as part of the *RDA as a principles-based standard* document that was presented by the JSC Chair to CoP earlier this year. We were unclear if the lack of numbering for the instructions on Place in the Places WG paper is due to the draft's preliminary status, or if our thoughts on a chapter without numbering were being sought. We have provided some brief comments on instruction set model presented in case a discussion on that subject is desired.

We agree it is expensive to accommodate changes to RDA instructions in the current format (we certainly appreciate the work involved in changing instruction numbers and references throughout). However, it will also be very expensive and time-consuming to change the structure of RDA. A full time editor would need to be hired. Although it may

be for a shorter term than Tom Delsey (2004-2009), we anticipate it would be a longer-term project than the rewording done by Christine Oliver (2012-2013). The co-publishers would need to make decisions about retaining and updating searching features like the AACR2 rule number search. Additionally, there will be the time and expense born by agencies using RDA in updating translations, policy statements, training materials, etc.   So we anticipate all related parties would need considerable advanced notice to prepare for these changes.

We do not believe that an entity-focused set of instructions should be devoid of layout and typographical formatting that enables easier reading and understanding of the instructions. All of these are helpful for a human to understand the structure and intent of RDA: the indentation of instructions and example boxes; the bold typeface of example explanations; the rule lines that mark Alternatives, Optional Additions, Optional Omissions, and Exceptions; and the simple and ordered lists for references in long sentences. We would be dismayed to lose this formatting, some of which was developed during the re-wording of RDA based on recommendations of the U.S. RDA Test Coordinating Committee.

II. Further Development of Chapter 16 and Related Chapters

We would support further development of chapter 16 in support of Place as an entity. However, there is the issue of timing to consider. The JSC has previously agreed to postpone extensive changes to RDA in areas that are likely to require significant review and amendment. LC's proposals are modest this year because of that working principle during this period of change. Place is clearly an area that will be affected by the outcome of the FRBR-LRM. As such, we believe that the Places WG should delay submitting proposals until the position of Place in the FRBR-LRM is finalized or the JSC should provide approval for development of chapter 16 as an interim measure. Regardless of the timetable for seeing changes in Chapter 16, we would welcome discussion papers on possible elements for Place such as identifier and date, as well as possible relationships between Place and other RDA entities.

Development of Chapter 37 (Related Places) and Appendix L (Relationships Between Concepts, Objects, Events, and Places) are not part of this discussion paper—we assume this is because of the current working principles for JSC proposals. If the JSC is agreeable to interim development of Chapter 16, should some preliminary work on these areas be done as well?

A. Chapter 11 vs. Chapter 16

The discussion paper states, "RDA instructions relating to the name of a government are better included in the treatment of the Corporate Body entity." However, the draft chapter on Place seems to move instructions from 11.2.2.4 on conventional names of governments to instructions on Place. We support the approach to government names in the draft because we believe most users see the country called the United States

and the organization that exerts authority on its behalf as the same thing. However, we do not understand the quoted statement in the introduction that contradicts this move.

We note that there will always be a relationship between chapters on corporate bodies and places as long as two separate chapters exist for these entities. This is because of the numerous subordinate government bodies, especially those types currently covered at 11.2.2.28-11.2.2.24. Also, as long as "Place Associate with ..." is an attribute of a person, family, and a corporate body, there will need to be harmony among those chapters.

B. Other Places

The issue of non-jurisdictional places, also called names of natural features has not been addressed by the Places WG. These places include the Atlantic Ocean, Tiber River, Great Barrier Reef, Mount Etna, Saturn (the planet), and the Blue Grotto. Man-made features often considered to have locational value such as streets, parks, and bridges have also not been discussed. We know that this has been a subject of much interest since these types of places have been excluded from RDA as they were from AACR2. Although it does not seem efficient for the Places WG to consider whether these types of places fit into the draft chapter on Place until the FRBR-LRM is complete, we ask that the Places WG keep this in mind as a future issue.

C. Impact on Current Practices for Authorized Access Points for Places

Although this discussion paper does not discuss the impact of the draft chapter on other chapters or current cataloging practices, we are compelled to comment on it because it is such a significant departure from current practice. The example presented in the section on Authorized Access Point Representing a Place (page 28-34) imply that the only difference between current practice and practice under this model would be spelling out previously abbreviated names. This is not accurate. The way the instructions on "additions to distinguish" are worded and laid out, a priority order for the type of associated place has been created. If a place is located within a country, the name of the country is added. An Alternative to "also add the name of a state, province, etc." in addition to the country has been presented. However, without additional instructions in the chapter itself or Appendix E, the examples do not follow the instructions. Currently, Appendix E contains no instructions on punctuation of access points for places because those are part of Chapter 11. If the Places WG were to model the punctuation instructions for Places on corporate bodies (see E.1.2.4), colons would separate the different place names in parentheses like this: Ipoh (Perak : Malaysia) and Wiesbaden (Hesse, Germany). We also note that without 16.2.2.10, the example for Urlingford in the basic instruction would look like this because United Kingdom would be used for the name of the country: Urlingford (United Kingdom). Although there are no examples showing places in what are now the

"exceptional places" in 16.2.2.9, these are some of the examples of how such places would look following the basic instruction and the alternative:

> **Basic instruction:** Ontario (Canada)
> **Alternative:** N/A
>
> **Basic instruction:** Adelaide (Australia)
> **Alternative:** Adelaide (South Australia : Australia)
>
> **Basic instruction:** Salt Lake City (United States)
> **Alternative:** Salt Lake City (Utah : United States)

The examples for the Alternative for Associated Cities or Towns also have punctuation issues. In addition, it is unclear about what "add the name of the country or larger jurisdiction in which the city or town is located" means.   There is no element called "larger jurisdiciton" in the draft. Is this intended to mean "other jurisdiction associated with a place" or does it mean an an area larger than a country, e.g., Europe?

D. Impact on Current Practices for Authorized Access Points for Corporate Bodies with a Place in Parentheses

This discussion paper does not address the issue of using place names as additions to authorized access points for other entities. If the instructions at 11.3 and 11.13.1.3 are unchanged, these examples at 11.13.1.3 would turn into the less useful forms presented below them. This means either more additions would be required to break conflicts or provisions for recording multiple place names in access points would need to be introduced into Chapter 11.   Because RDA instructions on adding place in an authorized access point for another entity say to use the name of the place, not the authorized access point for the place, this is how examples in the current 11.13.1.3 would look applying the proposed instructions for places:

Current forms:
Newport High School (Newport, Ky.)
Newport High School (Newport, R.I.)
Newport High School (Newport, Wash.)
Washington County Historical Society (Washington County, Ind.)
Washington County Historical Society (Washington County, N.Y.)

Forms with changes to place names given in discussion paper:
Newport High School (Newport)
Newport High School (Newport)
Newport High School (Newport)
Washington County Historical Society (Washington County)
Washington County Historical Society (Washington County)

Without modifying the current instructions in 11.13.1.3, catalogers must add other qualifiers from 11.13. For corporate bodies such as these, the only two choices are dates and other designation associated with the corporate body. Dates are often not available for local bodies like these so catalogers might be forced to use somewhat odd qualifiers, such as school mascots. This is what that might look like (mascots made-up):

> Newport High School (Newport : Badgers)
> Newport High School (Newport : Lions)
> Newport High School (Newport : Screaming eagles)

III. Content of the Instructions

A. Place Names that Include a Distinguishing Word or Phrase

The phrase "distinguishing word or phrase" is very vague and potentially confused with other elements. For example, what is the difference between a term indicating type of jurisdiction and a "distinguishing word or phrase"? It seems like such a term could be considered a "distinguishing word or phrase". The draft instruction seems like it is attempting to serve 2 different functions—providing instructions on place names whose names include the names of other places as well as the rather odd instruction currently in 16.2.2.13 about recording a word or phrase as part of the preferred name to distinguish two places with the same name: "If the inclusion of the name of the larger place or jurisdiction (see 16.2.2.9 RDA –16.2.2.12 RDA) is insufficient to distinguish between two or more places with the same name, include as part of the preferred name a word or phrase commonly used to distinguish them." This instruction has never made sense to us because if a word or phrase is not part of a place name, it should not be artificially added to a place name to distinguish—that is the purpose of authorized access points. Furthermore, the examples do not justify the instruction because the names of the towns as found in reference sources are "Alhama de Almería" and "Alhama de Granada" so they do not actually have the same name. We suggest changing this instruction to "**Place Names that Include the Names of Other Places**" and re-cast the text with that in mind.

B. Elements for Place
We have provided some comments for the PlacesWG to consider in future development of these elements and issues:

Date Associated with the Place (page 19-22)
- We do not believe that multiple element sub-types are necessary for this element. We suggest that the date associated with a family (10.4), which defines it as "a significant date associated with the family" is a better model for this element than date associated with a corporate body.

- We do not see a useful distinction between a date of establishment and termination vs. a period of activity for a place—these would seem to be the same.
- There are many significant dates associated with places that do not meet any of these types such as a date of independence or a date of transfer of sovereignty.
- "A period of existence" is the start date and termination date put together so we do not think it should be an element sub-type.

Coordinates of the Place (page 26-27)

- Coordinates of cartographic content (7.4) is not a good model for this element because those instructions are for works.
- In the spirit of internationalization and flexibility, coordinates of the place should not be restricted to longitude and latitude. There are many other ways to record coordinates including the Ordnance Survey National Grid reference system, the military grid reference system (MGRS), and Israeli Cassini Soldner.
- We would like the Places WG to consider the distinction between coordinates of the place and identifier for the place. We note that a set of coordinates is a character string that identifies the location of a place and thus differentiates it from other places.

City or Town Associated with the Place (page 19)

- The scope of this element does not make sense. A city section is by definition not a city or town since it is within a city. The scope seems to restrict this element to capital cities, but the name of the element implies a much broader association. We think that Houston and Dallas are just as much associated with Texas as Austin is.

C. Authorized Access Points

General Guidelines on Constructing Authorized Access Points (page 28-29)

- Some of the examples provided follow Alternatives later in the instructions. Examples should only show an Alternative instruction at the Alternative.

Authorized Access Points—Names of Intermediate Places (page 30)

- This instruction has no corresponding element name, and the reference to "Other Jurisdiction Associated with the Place" does not seem appropriate to the instruction name. Nothing in these instructions allows us to add the name of a county to the authorized access point for a place. This is a big problem since in the United States we often have multiple cities with the same name within the same state such as Springfield (Burlington County, N.J.) and Springfield (Union County, N.J.).

- The name "intermediate places" is confusing—is it a place at an intermediate jurisdictional level or is it a place that straddles the borders of two jurisdictions (e.g., Kansas City Metropolitan Area)?

Dates Associated with a Place (page 31-32)

- Without changes to Chapter 11, it is difficult to understand what has happened to the instruction on "when two or more governments claim jurisdiction over the same area". However, an instruction on adding an other designation associate with a place within an instruction on adding dates seems unprincipled.
- We suggest the group consider whether instructions developed for such specific and politically sensitive issues would be better left out of RDA as individual agencies may want to make their own decisions about how to treat these places. We note that if the instruction were followed as written, many more places would have this form of qualifier. Even countries with good relations dispute places, such as the Machias Seal Island, which is claimed by the United States and Canada. The absence of such instructions might make RDA easier to adopt internationally.

Some Notes about LC Practices

Using only latest name of a place as a subject is an LCSH practice, not necessarily a PCC practice, and it is restricted to cases in which there is a linear name change where the territorial identity remains the unchanged. There are many PCC libraries which do not use the Library of Congress Subject Headings Manual (SHM) or Library of Congress Subject Headings. While we appreciate attempts by the group to recognize our subject practices, there is no need to create special instructions in RDA (such as the Alternative to use only the current name of the place which has no correspondence in instructions for other entities) just for us. In fact, it seems that the current trend in RDA instructions is to say less and leave more up to agency decisions to be documented in policy statements.

Regardless of what RDA instructions say, we will continue to have appropriate LC-PCC PSs and subject cataloging policies for places. This is due in part to legal requirements as part of the federal government and also due to a large amount of legacy data to maintain. RDA's instructions on not qualifying names of US states by the countries allows us to have one access point for one name of the place instead of a multitude of access points that are difficult for users to understand. Without examining all of the resources involved, it is impossible for us to retrospectively change access points in our database to forms such as these:

> Louisiana (United States : 1812-1861)
> Louisiana (Republic)
> Louisiana (Confederate States of America)
> Louisiana (United States : 1865-)

The amount of resources involved makes this an unfeasible task for resources involving this one place in the United States, much less all the places that have been covered by exceptional practices.