The Bibliographic Standards Committee (BSC) of the Rare Books and Manuscripts Section (RBMS) of ACRL welcomes the opportunity to comment on the April 2008 Draft of the IFLA Statement of International Cataloguing Principles and its accompanying Glossary. In general, the 2008 document expresses principles and practices that we adhere to in the rare materials cataloging community. Descriptive Cataloging of Rare Materials (Books) and other components of DCRM currently underway have not only been built on current general cataloging codes and practice but have been informed by the conceptual model of FRBR. Because of the latter, rare materials cataloging standards are already forward looking. We are waiting for the transition in general cataloging to RDA, and rare materials cataloging standards will need to be reviewed once RDA is published and implemented. The 2008 Draft Principles are written for our current online environment and look to an environment beyond. Although written for the library context, the 2008 Draft Principles can be applied by other communities, just as RDA is being written by the international library community but aims to have application in other communities.

Comparison with Previous Statements

The 2008 Draft’s brief section on Bibliographic Description (Section 4) is an addition to the Paris Principles, which dealt only with choice and form of entry. This broadening of the coverage of cataloging principles is important. The new principles specify what entity the description is based on and give an instruction for when a separate record should be created, following an international standard, with different levels of completeness allowed. The inclusion of Section 7, Foundations for Search Capabilities, was lacking in the Paris Principles and is completely appropriate for today’s online environment.

The 2008 Draft shows a number of improvements over its immediate predecessor, the 2007 Draft finalized after the IFLA meeting in Seoul in 2006:

- With respect to the structure of the 2008 Draft Principles, the nine General Objectives (Section 0) were in an appendix in earlier drafts. Their movement to the beginning of the document before the Scope (Section 1) has given them prominence and better placement. Such is the placement of the scope, objectives, and principles of DCRM.

- In Section 6, Authority Records, the paragraphs on the choice of names, the language of access points, and the forms of name for each of the entities in earlier drafts appeared in Section 5, Access Points. They are much more suited to Section 6, particularly since authority control is so essential to our online cataloging environment. Authority records did not have a place in the Paris Principles.
• In Section 7, Foundations for Search Capabilities, “essential” is a better term to describe access points than “indispensable,” the word used in the 2007 Draft. Also, the addition to the 2008 Draft of “Identifiers for the entity” as a characteristic of “Essential access points in authority records” was needed to provide distinctive features to differentiate names.
• The Glossary has been added since the 2007 Draft. It is indispensable because so many of the terms in the document do require explanation.

Specific Comments on the 2008 Statement
Section 0, General Objectives
0.2 Common usage
In this context, the term “normalized” is ambiguous. If “standardized” is what is meant, then that is the preferable term. See point 0.8 where the phrase “Consistency and Standardization” and the word “standardized” are already used. On the other hand, the Glossary entry for “Normalized …” (p. 12) says “see Authorized …” If that is what is meant, then the term “Authorized” should be used. Otherwise, an additional definition in the Glossary is required to account for both uses of the word “normalized.”

0.6 Significance
For this objective to be meaningful, the phrase “bibliographically significant” or the concept of significance itself requires explanation or at least a definition in the Glossary.

0.7 Economy
“Economy” is a sound principle generally, but it seems to belong logically with “ Sufficiency and necessity” (0.5). The principle of necessity sets a minimum level of description, while the principle of sufficiency sets a maximum level. Economy inevitably falls within this range.
In rare book cataloging, where all manifestations need to be clearly distinguished, abbreviated and normalized transcriptions, as currently required by AACR2r for example, would be insufficient. (DCRM(B) Objective III.1.1: “Users must be able to distinguish clearly among different manifestations of an expression of a work.”)

Scope
In defining the highest principle, more precise terminology than “convenience” should be used. The highest principle for the construction of cataloging codes should be to enable users to accomplish the functions of the catalog effectively and efficiently.

Section 2, Entities, Attributes, and Relationships
2.2 Entities in Authority Records
“Work” is omitted from the list of entities authority records should control.

Section 4, Bibliographic Description
This section begins with the statement that “a bibliographic description typically is based on the item as representative of the manifestation …” which is consistent with and works well for rare book cataloging, if it can be interpreted in the way rare book cataloging practice means it. It is not entirely clear whether this principle means that different states and/or issues are not allowed separate bibliographic records. As explained in DCRM(B)’s first functional objective, “users of rare materials are typically interested in drawing finer distinctions among variants within manifestations than are users of other materials, including not simply between editions and issues but between variant
impressions and states; many also need to distinguish between copies at the item level.” Thus, it cannot always be assumed that the resource being described is “representative” and not a “variant” of a manifestation.

Section 6, Authority Records

6.1 Choice of Names for Authorized Access Points

There is a concern that this principle may conflict with recording manifestation-level names. In pre-20th century resources, it is not uncommon for persons to be both authors and publishers. The problem arises when as publisher, the person uses his real name, but as author, he uses a significantly different pseudonym.

Example: Richard, 19th cent.
(Access point for bookseller, A.O. Delarue with usage as author: Richard, LCCN #91010910)

Principle 6.1 accords with current rules (e.g. 22.2 and corresponding LCRI). For non-contemporary names where no clear distinction in bibliographical identity can be established, the name most commonly used becomes the basis for the heading and all other names are noted with “see” references. (Pseudonyms for persons who died after 1900 get separate authority records if each pseudonym represents a different bibliographic identity, and are cross-referenced with “see also” references).

As the example above indicates, for rare book cataloging it would not be useful to have “Richard, 19th cent.” as the heading for a record that seeks to trace books published by A.O. Delarue. The preferred form of name would in this case be difficult to ascertain because no “conventional” form of name can be established, unless rules change to allow for something like a “relator identity” the way they allow for “bibliographic identity.”

Section 7, Foundations for Search Capabilities

7.1.2.1 Essential access points in bibliographical records

If the term “heading” is no longer used in these principles, is the phrase “subject headings” acceptable here? “Subject heading” also appears in the definition of “subject cataloging” in the Glossary.

General Comments on Terminology

“Access point” has become a common phrase among catalogers, but the complete elimination of the word “heading” in the 2008 Draft Principles is somewhat dismaying. The word “heading” was still used in the 2007 Draft (e.g., Section 5.1.2, Choice of Names for Authorized Headings), and the word is frequently used in FRBR. Also, “uniform title” is not used in the text of the 2008 Draft. “Authorized access point” and “controlled access point” may have become generally acceptable as alternate ways of expressing “heading,” but using “authorized access point for the work/expression” seems a bit long for “uniform title,” requires explanation, and offers little improvement over existing jargon.

“Title” is a major element that is not defined in the Glossary. Perhaps it does not need a definition because it has a normal dictionary meaning?

“Preferred title” is used in the text (first at 6.1.2), but is not defined in the Glossary. An explanation or definition would be helpful. Other words in the text modified by “preferred” are “form” and
“name.” Several terms in the Glossary are defined using the word “preferred,” so it appears that “preferred” may be synonymous with “authorized,” e.g. “authorized access point” is defined as “the preferred controlled access point.” In 7.1.2.1, is “the preferred title for the work/expression” an alternative form for “authorized access point for the work/expression”? In the Glossary, “reference” is no longer used, but the word “reference” is used in the definition of “variant form access point.”

Respectfully submitted (on behalf of the ACRL/RBMS Bibliographic Standards Committee),
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