

**TO:** Mary Woodley, Chair, Cataloging and Classification Section

**FROM:** John Myers, Chair, ALA/ALCTS/CCS Committee on Cataloging: Description and Access (CC:DA)

**SUBJECT:** Report of Strategic Comments on *Resource Description and Access*

**ENCL.:** (1) Abstract of Goals and Objectives for *Resource Description and Access*  
(2) Background Report of Strategic Comments on *Resource Description and Access*

## Charge

At the 2008 Annual Conference of the American Library Association, CCS Executive Committee requested CC:DA prepare a report summarizing CC:DA's review of *Resource Description and Access* (RDA), which CCS Executive Committee could then use as a basis for making an official recommendation to the ALCTS Board of Directors about how to proceed with RDA. Such report should include concerns with RDA, highlighting the most serious problems and challenges and how to deal with them.

## Response

In submitting strategic comments, it is necessary to understand the goal which such comments intend to accomplish. The goal is no less than the successful launch of RDA as a viable successor to the *Anglo-American Cataloging Rules*, 2<sup>nd</sup> ed. (AACR2). CC:DA firmly believes that a new, forward looking code is needed. CC:DA, as a body of knowledgeable and prospective users, is far from convinced though that RDA as presently formulated will be successful.

We acknowledge the considerable investment in time, effort, and capital on the part of the Co-publishers, the Committee of Principles, the Joint Steering Committee, and indeed the constituencies of which CC:DA is just a part. We are cognizant of both the positive outcomes and the risk inherent in this investment. The condition and content of the complete draft, released November 17, 2008 for review, raises substantial questions that warrant resolution. We believe that a delayed standard will pale in comparison to the financial catastrophe of a failed one.

A brief outline of issues surrounding RDA, positive and negative, is presented, followed by recommendations. A more substantial development of issues presented here is offered in enclosure 2.

### 1. A new standard is needed.

Substantial changes have occurred in the cataloging environment since AACR2 was published in 1978. CC:DA affirms and supports the development of a new cataloging code embracing the framework set out in *Functional Requirements of Bibliographic Records* (FRBR).

**2. The technical writing is a barrier to implementation, even for those who want to see RDA succeed.**

CC:DA is persuaded that numerous issues with the writing style in the current text represent a serious threat to the acceptance of RDA as the successor standard to AACR2.

**3. A print version of RDA is required.**

CC:DA advocates on the part of numerous market components that lack the financial and technological resources to make use of an online product. RDA content is intended to support a print format; the Co-publishers should honor that intent and meet the needs of the market.

**4. There is, as yet, no online interface for RDA.**

Release of the “complete draft” was postponed pending its release in an online interface that is not yet available. It is imperative to observe how the RDA content works within the context of its intended, primary interface, particularly because the online interface has been heralded as the answer to criticisms of the writing and navigation in earlier drafts.

**5. There is no information available regarding price for online and print versions**

CC:DA has requested price information from the RDA Co-publishers on more than one occasion. The same questions were raised at IFLA Satellite Meeting on RDA (Quebec, August 2008). Current users of AACR2 have no idea at this point what their cost for RDA might be and correspondingly whether they can afford to acquire and implement it.

**6. RDA fails to meet the majority of its stated objectives.**

CC:DA questions the viability of RDA when it fails to meet the objectives set for it by the Joint Steering Committee (see enclosure 1). Besides concerns about Clarity and Format as expressed above, we feel the following are not adequately met: Rationality, Currency, Adaptability, and Ease & Efficiency of Use.

**7. Training of catalogers will be extremely challenging.**

From the draft in hand, CC:DA believes that not meeting the JSC objective of ease and efficiency of use, coupled with the lack of an adequate introduction covering the underlying principles, means that RDA is a product that fails to articulate a coherent program for production of bibliographic metadata. It is difficult to envision cataloging in such an environment, let alone meaningful instruction of new catalogers.

**8. A nimbus of disappointment surrounds the RDA drafts, online product, and overall project.**

In online discussion lists, one reads of palpable disappointment in RDA, not by just naysayers, but broadly by individuals fully engaged in moving the cataloging community forward. CC:DA observes that the RDA Publishers and the JSC have some ground to cover to make RDA a credible product.

## **9. Some aspects of RDA represent a step forward.**

The RDA development process has yielded some positive results – collectively, these results position RDA to move the cataloging community forward with respect to greater adaptability for emerging formats, addressing new relational database structures, and collaboration with the wider metadata community. CC:DA hails these advances and wishes the overall execution better reflected the openness to change that generated these accomplishments.

## **Recommendations**

CC:DA makes the following recommendations:

### **A. ALA charge the JSC to rewrite RDA to better realize its stated objectives:**

1. Written in plain English, and able to be used in other language communities;
2. Rational, current, and adaptable, through better exposition of underlying principles for the rules;
3. Easy and efficient to use, both as a working tool and for training purposes.

### **B. ALA charge the publisher to respond to market requests and JSC objectives:**

1. Commit to producing stand-alone products (print and e-book) in addition to the online interface, in order to realize the JSC objective for Format;
2. Present a workable timeline and deliver on it for a functional online interface;
3. Respond to market requests for prospective pricing information and acquisition models.

### **C. ALA support the retention of RDA's success stories:**

1. Sustain maintenance of RDA terminology as RDF vocabularies;
2. Continue support in RDA of three implementation scenarios that simultaneously foster transition to new database structures while supporting legacy systems;
3. Continue integration of subject access into RDA.

Of these three recommendations, the first is most crucial and urgent. The second is only slightly less so, while the third should be taken as a given. Foremost is our concern that the content of RDA must be made to work. RDA was intended to simplify cataloging: presently it does not. ALA, and its credibility, is involved at all levels in RDA development: Co-Publishers, Committee of Principals, Joint Steering Committee, and Constituency. The CCS Executive Committee must urge participants at all levels to correct RDA's most critical flaws before commercial release.

**Enclosure 1: Abstract of Goals and Objectives for *Resource Description and Access***

**TO:** Mary Woodley, Chair, Cataloging and Classification Section

**FROM:** John Myers, Chair, ALA/ALCTS/CCS Committee on Cataloging: Description and Access (CC:DA)

**SUBJECT:** Abstract of Goals for *Resource Description and Access (RDA)*

The following represent excerpts of goals for RDA, from two sources, the JSC's *Strategic Plan for RDA, 2005-2009*<sup>1</sup>, and *RDA – Resource Description and Access. Objectives and Principles*<sup>2</sup>.

From the *Strategic Plan for RDA, 2005-2009*:

**STATEMENT OF PURPOSE FOR RDA**

*RDA – Resource Description and Access* will be a new standard for resource description and access, designed for the digital world.

Built on foundations established by the *Anglo-American Cataloguing Rules (AACR)*, *RDA* will provide a comprehensive set of guidelines and instructions on resource description and access covering all types of content and media.

*RDA* will enable users of library catalogues and other systems of information organization to find, identify, select, and obtain resources appropriate to their information needs.

**LONG TERM GOALS FOR RDA**

1. The guidelines and instructions in *RDA* will be designed to:

- Provide a consistent, flexible and extensible framework for both the technical and content description of all types of resources and all types of content.
- Be compatible with internationally established principles, models, and standards.
- Be usable primarily within the library community, but be capable of adaptation to meet the specific needs of other communities.

2. Descriptions and access points produced through the application of *RDA* guidelines and instructions will:

- Enable users to find, identify, select, and obtain resources appropriate to their information needs.

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<sup>1</sup><http://www.collectionscanada.gc.ca/jsc/stratplan.html> = 5JSC/Strategic/1/Rev/2 1 November 2007

<sup>2</sup> <http://www.collectionscanada.gc.ca/jsc/docs/5rda-objectivesrev2.pdf> = 5JSC/RDA/Objectives and Principles/Rev/2 28 October 2008

- Be compatible with those descriptions and access points devised using AACR2, and present in existing catalogues and databases.
- Be independent of the format, medium or system used to store or communicate the data.
- Be readily adaptable to newly-emerging database structures.

3. *RDA* will be developed as a resource description standard that is:

- Optimised for use as an online tool (although a print edition will also be published).
- Written in plain English, and able to be used in other language communities.
- Easy and efficient to use, both as a working tool and for training purposes.

From *RDA – Resource Description and Access. Objectives and Principles*:

## **Objectives**

### **Comprehensiveness**

The guidelines and instructions should cover all types of resources and all types of content represented in catalogues or similar tools.

### **Consistency**

The guidelines and instructions should be consistent in their formulation.

### **Clarity**

The guidelines and instructions should be clear and written in plain English. They should be unambiguous with respect to underlying concepts, terminology, and scope of application.

### **Rationality**

The guidelines and instructions should reflect rational, non-arbitrary decisions.

### **Currency**

The guidelines and instructions should be responsive to new developments affecting the range, nature, and characteristics of the resources and types of content covered, and to the emergence of new types of resources and content.

### **Compatibility**

The guidelines and instructions should be compatible with internationally established principles, models, and standards.

### **Adaptability**

The guidelines and instructions should be amenable to adaptation by various communities to meet their specific needs.

**Ease and efficiency of use**

The guidelines and instructions should be easy and efficient to use.

**Format**

The guidelines and instructions should be amenable to presentation in either a conventional print format or in a digital format embodying features such as hypertext links, selective display, etc.

**Enclosure 2: Background Report of Strategic Comments on *Resource Description and Access***

**TO:** Mary Woodley, Chair, Cataloging and Classification Section

**FROM:** John Myers, Chair, ALA/ALCTS/CCS Committee on Cataloging: Description and Access (CC:DA)

**SUBJECT:** Background Report of Strategic Comments on *Resource Description and Access*

**CHARGE**

CC:DA presents the following strategic comments regarding *Resource Description and Access* (RDA) and its implementation, as charged by the CCS Executive Committee (CCS Exec) at the ALA 2008 Annual Conference. At that time, CCS Exec requested of CC:DA a report summarizing CC:DA's review of RDA, which CCS Exec could then use as a basis for making an official recommendation to the ALCTS Board about how to proceed with RDA. Such report should include concerns with RDA, highlighting the most serious problems and challenges and how to deal with them.

**INTRODUCTION**

The following comments are somewhat lengthy and are provided as background to the Executive Summary document, which addresses their themes and makes recommendations in what is hoped to be a more workable and appropriate fashion. They are admittedly strongly stated, but in their draft form they appear to have struck a chord, so they are offered unapologetically for the purpose of giving voice to those who found them expressive of their hopes and concerns.

CC:DA has been fully engaged in the review process for RDA and its predecessor AACR3 for five plus years. We understand fully and passionately feel the need for a new, forward looking code. We want a new code we can fully support and believe in. We feel though that we have been engaged in a "war of attrition" in trying to achieve such a code. While there are meritorious advances to be found in RDA, we fear that, in the compromises made and the mechanistic approach taken, its present form will only lead to another "crisis in cataloging," as Osborn described the 1941 draft ALA code. At present, RDA is unteachable and unusable as a cataloging code.

We have significant issues with the overall lack of readability in the technical writing specifically, and the failure generally of RDA to meet its stated objectives. These issues are of such magnitude and have largely been ignored for so long, that we seriously considered the "nuclear option" of withdrawing ALA participation from RDA development and implementation. This is not realistically a workable solution. But we would not contemplate, much less recommend, such a course of action except for the extremity of our concerns for the ultimate viability of the RDA product as it presently stands.

These are coupled with secondary concerns regarding the lack of support for a print product; the contrasting failure to present a workable online interface; and the failure to present the market with any indication of a possible pricing structure.

## MAIN REPORT

### I. A new standard is needed.

As reported in *Functional Requirements for Bibliographic Records* (FRBR) in 1998, the cataloging environment has changed significantly in the decades since the issuance of the Paris Principles, the previous major examination of cataloging principles. These changes are no less relevant or applicable to the AACR cataloging code. These changes include:

- 1) development of machine-readable cataloging and subsequent emergence of online catalogs;
- 2) development of non-linear database structures (in which to store catalog records)
- 3) emergence of digital technologies and their impact on the nature, storage, conveyance, and access to information resources;
- 4) emergence of new participants outside of libraries with an interest and stake in metadata creation and sharing;
- 5) the reassessment of cataloging principles in FRBR and its affiliated reports – FRAD and FRSAR.

These all point to a need for a new code that:

- 1) is not predicated on the visual parsing of data presented on a 3x5 card;
- 2) allows records to be formulated and stored in a relational database rather than constrained as a simulacrum of a linear card file;
- 3) affords the ability to harvest metadata (supplied or derived);
- 4) is not constrained by fixed categories of formats;
- 5) is principled and adaptable to an ever-evolving flux of digital possibilities;
- 6) is simplified for adoption by metadata creators outside traditional library cataloging;
- 7) is cost-effective for budget-minded library institutions.

Further, efforts to develop RDA serve to highlight problematic aspects of AACR2 and thereby reinforce the assessment that a new code is warranted. The pre-existing inconsistencies in the rules across the various formats for each specific element are brought into high relief once aligned side-by-side. Problematic differences in the treatment of works and manifestations in the manuscript era, the printing press era, and the emerging digital era are more readily apparent. The complex and idiosyncratic practices dealing with the special areas of music, law, art, and religion are acknowledged, by AACR's original editor (The true history of AACR2, 1968-1988: a personal memoir / by One Who Was There [i.e., Michael Gorman]), as a weakness of the existing rules. They are likewise more apparent as the rules are examined with an eye toward broad, underlying principles. Resources of mixed responsibility when examined under the FRBR concept of the work entity call into question existing rules addressing such resources. All of these argue for the validity of the intention to formulate a new cataloging code.

**II. The technical writing “is a tremendous barrier to implementation, even for those who want to see RDA succeed” (CC:DA wiki).**

The quality of the technical writing, or lack thereof, has been a recurring theme throughout CC:DA's reviews of the RDA drafts. It is the most broadly supported strategic concern by the committee.

The new code is supposed to enhance the use of cataloger judgment. This end is poorly served by the stilted, formulaic treatment employed by the editor/author. This has resulted in a text that is soulless, inelegant, and mechanistic. These flaws could be forgiven however, if the results were effective: they are not.

The drive for comprehensiveness has resulted in endless redundancy. It is as if in formulating this intended digital code, the editor had reverted to card cataloging practices in creating the text – recreating a complete description at each point it is needed, instead of using appropriate cross-references or pointers, as is used in online catalogs and which is very ably handled by the XML environment in which the text is intended to be coded. This contrasts with other instances where a rule consists merely of directions to other rules. On another point of the technical writing, a reviewer observed, the “obtuse language is mind-numbing.” Previous drafts have elicited comments regarding the circular nature of definitions. This situation is still not adequately resolved. The overall situation may best be summarized by another reviewer's comment that the rules “have taken a step backward in terms of exposition and organization.” More straightforward, RDA fails its stated objective of “Clarity”; it is NOT “clear and written in plain English” (5JSC/RDA/Objectives and Principles/Rev/2).

The reorganization of the rules along element rather than format lines on the conceptual and macro-scale was one of the positive changes to come out of the RDA drafting process. It alleviates the need to “hunt and peck” for appropriate rules across chapters as materials increasingly refuse to be confined by the format-specific “boxes” of AACR. The impenetrability of the RDA text overwhelms this potential benefit.

We have repeatedly voiced this concern throughout the RDA drafting process. It has been repeated by other international constituencies, although to a lesser degree by the other JSC constituencies. The issue of readability (among others) has been noted in *On the record* (§3.2.5.2) as something to be addressed by the JSC. This chorus has only been answered by incremental changes, when a serious re-write is warranted.

### **III. The text is not “amenable to presentation in ... a conventional print format”** (5JSC/RDA/Objectives and Principles/Rev/2).

There is a two-fold component to this concern, which constitutes one of the RDA goals. First is the structure of the text, second is the support of a conventional print product by the publisher. Since the structure of the text is an issue largely touched on in point II above, we focus here on the issue of publication of a print product, which was the second greatest issue of concern among members of the committee and the ALA community.

CC:DA recognizes the benefits of an online interface to those with the means, resources, and need to use it. We value the awareness that resulted in support of an online format in the RDA goals. We are however also aware that there are important market constituencies that will find

the availability of a print product to be invaluable. These include libraries with limited financial resources to access an online product; libraries with limited need to access the rules; training and educational institutions; individuals seeking to use the rules; and institutions with limited connectivity to electricity, the internet, or both. Even a static e-book version might reasonably serve all but the last of those constituencies. The proposed subscription model, rather than purchase, for the online product is also troubling.

Further, CC:DA recognizes the substantial development efforts to be incurred in creating an effective online interface. The publisher however, appears to have pursued an online product to the exclusion of the print product. In successive meetings, the publisher has retreated more and more from a print product. At ALA 2008 Annual, it was reported that since RDA was written and designed as an online product, there would be, at best, print derivatives, since many of the online tools and functionalities wouldn't be available in a print version. The publisher had to be corrected by ALA's former representative to the JSC that "for two years, we have been telling the cataloging community that there will be a print format" (CC:DA minutes, ALA Annual 2008). Another committee member reminded the publisher that the JSC website still states there will be a print version.

The short-sightedness of this 'online product first, paper product when we get to it, if ever' approach was made manifestly apparent in the issuance of the "complete draft." The first rule of migrating data to a new platform is to ensure that you can get the data back out of the new platform in no worse condition than it went in. As the condition of the "complete draft" showed, this maxim has been entirely disregarded, with a hasty and inaccurate conversion to PDF format as a result. The multitude of problems with respect to layout, typographical errors, incorrect internal references, etc., have severely hampered the final phase of the review process, serving as a source of distraction from the more important issues of content, when they weren't an outright source of misrepresentation of that content. These shortcomings have severely undermined the credibility of the entire RDA product.

#### **IV. There is, as yet, no online interface for RDA.**

The release of the "complete draft" was deferred to allow for its release in an early version of the online interface. That, in fact, failed to occur. After several delays, the "complete draft" was released in poorly executed PDF files. Aside from the issues with the PDFs, the ultimate result of this was failure of the expectation to review not just the draft text, but to review the functionality of the text in the online context. At this point, no one knows what RDA online will look like or how it will work. As we have repeatedly been told that navigation in the online interface will address the many ongoing concerns throughout the drafting process with respect to repetition and poor organization, we are understandably anxious to see how these claims will hold up.

It is particularly vexing when the review timeline for content has been held to burdensomely tight deadlines all to have the text ready for the online interface, only to find that the interface is now the delaying factor. Further, input on functional requirements for the online interface was sought as early as ALA Annual 2005, a mock up of functionality was offered to focus groups at ALA Midwinter 2006, with further prototype developments at ALA Annual 2006. Two-and-a-

half years later, with content nominally ready by the JSC (but subject to criticisms offered here) and said content translated to XML coding, we await the ability to launch it all in a workable interface.

Concomitant with the desire to see the online interface is the expectation that there will be an adequate review period for both how it meets its functional requirements and how well the content works in it.

#### **V. There is absolutely no information available regarding the pricing model.**

There still are no indications of any kind of pricing models from the publisher. While it is understood that final costs are unknown, the publisher has failed to respond to queries about options for access and licensing. This despite repeated input regarding the desirability for print options; static electronic versions; and interactive versions to be bundled under the Catalogers' Desktop product. There have been few details about subscription models with respect to occasional use; educational and training usage; routine access by a single user; routine access by multiple users; etc. All of these were concerns for individuals and institutions in the "flush" years when RDA was initially envisioned. They are even more pressing in the current economic and fiscal climate. Even institutions with adequate financial resources are anticipating the need for multi-year planning for RDA expenses. Lacking any information, there is deep and widespread anxiety about the potential pricing structure of RDA. To offer blithe assurances that all will be okay, to assume that we will buy into the "emperor's new clothes" regardless of price just because we are expected to, is becoming increasingly patronizing and unrealistic.

As catalogers, we regularly make reasonable calculations that a project of a given size can either be completed in a certain time-frame for a given productivity level or else requires a certain productivity level for a given time-frame. Even though final costs are not known, the publisher should have sufficient financial acumen to make similar calculations regarding cost recovery. Working from that cost recovery data, market analysis should indicate what market sectors exist and how costs might equitably be distributed across them.

Under the present circumstances, no one knows how or whether they can afford to acquire RDA, much less implement it.

#### **VI. RDA fails to meet the majority of its stated objectives.**

Of the RDA objectives stated in the Objectives and Principles document, only three might reasonably be considered to have been met (and even then not without qualification): Comprehensiveness, Consistency, and Compatibility. CC:DA has significant concern regarding accomplishment of the remaining six goals, some aspects of which are touched upon in sections II and III above, but are laid out under the specific goals here.

**Clarity:** instructions are less clear than they could be, are significantly deficient in writing style, and still suffer from attempts to define concepts that may be axiomatic with circular results. In the final analysis, they are frequently NOT "written in clear English."

**Rationality:** the instructions retain many of the arbitrary decisions inherited from AACR2 and the current reorganization now highlights how arbitrary some of those inherited decisions are. Would that the time and effort to "rationalize" the rules had been made as a preamble to the drafting process.

**Currency:** the inadequate exposition of the principles that underlie rule formation (as opposed to the functional objectives for the resulting records), coupled with the failure to meet the "rationality" objective as stated above, make it extremely difficult to extrapolate and extend the rules to novel circumstances or to emerging content and media formats. This failure significantly hampers the ability of the rules to remain current and extensible.

**Adaptability:** the instructions remain at their heart a detailed accounting of existing cataloging rules. Again, the failure to expound on the underlying principles results in failure of this objective. Where the intent is a code that would be amenable to adaptation by other (metadata) communities, the result is a code where it is questionable whether it can be adopted/adapted by even the library cataloging community.

**Ease & Efficiency of use:** the rules are predicated on an online format, which has yet to be presented in a viable form. The print drafts, such as they are, have been rife with "textual bloat" and needless, confusing repetition. They have taken a step backward in terms of exposition and organization. There are numerous instances where individual rules needlessly repeat identical text, a situation that points to the possibility of further generalization. Contrastingly, there are general "rules" that merely consist of a confusing welter of cross-references to differently formulated rules addressing more specific situations.

**Format:** besides the exclusive focus on a strictly online product by the publisher and the consequences of such focus on the release of the "complete draft", there is the ability of the source text to support a print product as well. The text of the "complete draft" exhibits the same faults as that of previous drafts with respect to readability and usability in a print context.

These issues collectively, as with the specific issues of the technical writing and lack of a print format, are not new to CC:DA's concerns, having been raised in all of the responses to the various drafts. Nor are they unique to CC:DA. But they have seemingly fallen on unresponsive ears. We seriously question the viability of a new code that so patently fails to meet its stated objectives.

## **VII. Training of new and old catalogers will be extremely challenging.**

Many of the preceding issues have direct bearing on training. Educators have repeatedly expressed the need for a print product for classroom use. The failures of the goals of "clarity", "rationality", and of "ease and efficiency of use" present particularly strong impediments to bringing new catalogers into the profession. This is coupled with the absence of an adequate introduction that elucidates the principles of the rules and their application in a satisfactory manner. The difficulties are present not just for educating new catalogers. Current reviewers have attempted to apply the rules, with little success and many challenges, mostly revealing the "holes" in the rules. If those who are most closely affiliated with RDA development are not able

to produce results, what hope is there of imparting this knowledge to existing or new catalogers who have not been part of the process? Further, the insistence on adherence to a predetermined development schedule has resulted in a 22-page document of unresolved issues to be carried forward into post-release development, some of which are significant in terms of the potential resulting rule changes. This will result in a significant moving target for training efforts during the testing and implementation phase.

### **VIII. There is a nimbus of disappointment surrounding the RDA drafts, online product, and overall project.**

As might be expected given the criticisms and concerns offered thus far, the draft code not only fails to meet its stated goals but fails to address or poorly addresses the circumstances laid out in the first strategic statement. One need only monitor the various cataloging electronic discussion lists to hear the palpable disappointment in RDA. These are not just the comments of stick-in-the-mud, 'you'll pry AACR2 from my cold, dead hands' individuals. Rather, there is significant participation by anxious rank-and-file catalogers and by individuals fully engaged in moving the cataloging community forward.

A reviewer describes RDA as suffering from conflicted vision. "On the one hand, ... RDA was to be a brand new code, with an entirely new foundation and a new structure; but on the other hand, the formulation of underlying principles for a new code was made subordinate to the effort to shoehorn existing rules into the new structure. So out of one side of the mouth comes, 'Forget AACR2; this is a brand new code for the new millennium!' But out of the other side of the mouth comes, 'We don't have time to change what it is we were doing under AACR2; wait until we get all this published, then ask for changes.'"

Another reports, "The ambivalence toward this "brand new" code has been palpable for years. 'Let's not upset our constituency by making sweeping changes, but let's just sneak the old stuff into a new document so that we don't rock anybody's boat.' Catalogers are constantly dealing with change; it is insulting to think that we can't handle these changes."

There is significant concern about the opportunity for reviewers to conduct an adequate review of the final draft. As has been mentioned previously, the failure to issue it in an online interface has precluded assessment of how well the text will work as intended in its primary interface. In general, reviewers felt that there just wasn't sufficient time to meaningfully examine a document of this size, especially given the difficulties with both writing style and generation of the PDFs. Navigating the print PDFs was also challenging in the absence of an index. Given these circumstances, reviewers found that the time allotted for review was insufficient to the task.

There was mention made, early in the process, that one of the motivations for a new code was fiscal – the market was saturated with copies of AACR2 and a new replacement code was necessary to reinvigorate that revenue stream. The perceived urgency of this cynical course of action would seem to be the underlying cause for much of the pressure to push through the drafts as quickly as possible. Much of the hesitancy to rigorously revising the rules appears grounded in concern over implementation costs, as was experienced with AACR2. This time, instead of creating an alternative North American text as AACR1 did to allow the practice of

superimposition, we are imposing AACR2 practices on the entire new code. We are ignoring the lesson of superimposition that cost savings today are only compounded as expenses in the future. If change is due and warranted, the code needs to reflect that accurately. We should not be putting on conceptual blinders. The compromises in response to these perceived financial issues have seriously weakened the code and its prospects for acceptance and viability.

### **IX. Some aspects of RDA represent a step forward.**

We opened with the need for a new code and some of the characteristics such a code should exhibit. Despite the significant faults of and concerns with RDA as presently constituted, it is not without its merits, albeit oft-times qualified.

As previously mentioned, the macro-scale reorganization of the rules along element lines is a significant move in improving application of the rules to new blended formats and media. The mash up process has not yielded entirely satisfactory results, but this is the direction the rules should be heading. The rules support the “3 implementation scenarios” model. This allows them to support current linearly-structured, textually-linked records and databases while affording the future opportunity to support resource-identifier-linked, relational database structures. The language of the rules is moving towards a rendering in FRBR terminology. The overall structure is aligned with the FRBR entity groups and user tasks. There is still some settling in with this process and may represent the most significant conceptual adjustment for catalogers. The new formulation of rules for access points has moved away from rules to construct headings towards rules to record Group 2 entity attributes and then how to combine those attributes into headings. This is one area where significant attention was paid to early criticisms and has improved significantly, although there is still room for further improvement. The anticipated chapters on Group 3 entities (i.e. subjects) represents the first time the Anglo-American cataloging tradition has addressed subject access in the context of descriptive cataloging since Cutter’s *Rules for a dictionary catalog*. This is hoped to be an exciting and positive development. Another area where the process has “worked” is in the recording of relationships between information resources. This too has significantly improved in response to comments. We also recognize efforts to internationalize RDA, recasting the rules in ways that make it adoptable across various languages and scripts. Similarly important is the JSC's work with the DCMI and ONIX communities to standardize the terminology used in RDA as an RDF vocabulary and to settle on terminologies used for various kinds of resources. Both efforts are an important step forward in the reuse of data across various metadata communities.