

**TO:** Glenn Patton, Chair, Working Group on Functional Requirements and Numbering of Authority Records (FRANAR)

**FROM:** Cheri Folkner, Chair, ALA Committee on Cataloging: Description and Access

**SUBJECT:** ALA response to the 2nd world-wide review of *Functional Requirements for Authority Data*

The ALA Committee on Cataloging: Description and Access (CC:DA) appreciates the opportunity to comment on the draft of the *Functional Requirements for Authority Data* (FRAD). In order to review the document in a timely and thorough manner, a Task Force (TF) was charged to do the review and issue a report. The Task Force's report was discussed by the full CC:DA membership at the ALA Annual Conference in Washington, D.C. The sections of the TF report commenting on FRAD as amended based on the CC:DA discussion begin on p. 2.

The report is organized as follows:

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## I. GENERAL COMMENTS ON THE FRAD DRAFT

### ▪ **Title Change:**

The task force generally supports the change in title from *Functional Requirements for Authority Records (FRAR)* to *Functional Requirements for Authority Data (FRAD)*. One member noted the parallel with Diane Hillmann's discussion of metadata control at the element level. However, the distinction between the two terms ("authority records" and "authority data") is not clearly articulated in the draft. The "Introduction" instills confusion right from the start by stating that the first "term of reference" for the FRANAR group was "to define functional requirements of authority records" and then stating "this document fulfills" that term of reference (leaving the reader to wonder why the document is called FRAD rather than FRAR). Moreover, some instances of the old "authority record" terminology may still need to be revised to reflect the new title (see comments under "Introduction," "1. Purpose," "2. Scope," etc.).

### ▪ **Earlier CC:DA Review of FRAR:**

The task force was pleased to note that many of the suggestions for revision made by the CC:DA task force that reviewed the FRAR draft in 2005 have been incorporated into the FRAD draft. However, we were disheartened that the draft did not take advantage of more of the recommendations made by that initial task force. Incorporating some of them would improve the usability and readability of this document immensely (e.g., adding a glossary, using clear and direct language, broadening the scope of the document beyond the library sector, etc.). We have therefore repeated some of the earlier suggestions in this report.

### ▪ **Use of Entity-Relationship Model:**

The task force questions the extent to which FRAD is truly following the entity-relationship model presented in FRBR. A bibliographic database founded on FRBR entity-relationship principles would contain work entity records, expression entity records, manifestation entity records, item entity records, person entity records, corporate body entity records, family entity records, concept entity records, object entity records, event entity records, etc. These would be linked to each other by different types of relationships. For example, a work entity record for "Romeo & Juliet" would be linked to a person entity record for "Shakespeare, William" through a "created by" relationship link. The name of the person would not be recorded in the work entity record. Therefore, there would be no need for an authority record showing the cataloger the form of the name he or she should use and no need for an authority record with variant name access points because either (under FRBR) these would be recorded as attributes within the person entity record, or (under FRAD) these would all be given their own "name" entity record and linked to the "person" entity record by a "known by" relationship link. In either case, a user would reach the person entity record via any recorded variant to the name. What we now call *authority work* would continue to be done — in order to create the "person" entity record we would need to do much the same work we now do to create a personal

name authority record. But we would not be creating an authority record. FRAD would be a better document if it were conceived of as an extension of the concepts already outlined in FRBR and a working out of the details of how to create a person (etc.) entity record and what to include as its attributes, rather than putting so much in the context of current authority practices. We realize that was what IFLA assigned the Working Group to do in its terms of reference (“define functional requirements of authority records”) but it seems that in a true entity-relationship database environment, we would not have any authority records at all. That said, *however*, many task force members have a hard time conceptualizing a work entity record that doesn’t contain any information about the author/creator. The relationship link between the work and person entity records would have to be *very strong* for this model to work. Moreover, it would be essential to have the work entity record display in a meaningful way in a set of search results containing other work entity records. We assume that a properly designed system would be able to display, within the list of search results, those entities that are related to each work entity record, thereby allowing the user to more easily select the desired work entity. We also assume that such a system would permit easy navigation between related entities. We recommend that FRAD be conceptualized more rigorously, that the use of the FRBR entity relationship model be explained more clearly, and that concerns about display, navigation, and the strength of the relationships between entities (especially the name/title relationships that are so useful for unambiguously identifying work entities), be addressed more explicitly.

▪ **Appropriateness of Entity-Relationship Model:**

Some question not simply the extent to which FRAD is (or is not) following the entity-relationship model presented in FRBR, but whether or not an entity-relationship model is even useful for our purposes.

▪ **Artificiality of FRBR/FRAD Division:**

Some comment that the division between bibliographic and authority data (and thus the division between FRBR and FRAD) is artificial within the context of an entity-relationship model and wonder whether it might have made more sense to simply define the functional requirements for the FRBR Group 1 entities and the functional requirements for the FRBR Group 2 entities.

▪ **Creator-Work Relationship:**

The task force is concerned that the creator-work relationship has not been addressed explicitly (or sufficiently) in FRAD, given the importance of this relationship in the construction of name-title headings representing work entities. The high-level diagram in section 3.2 (Figure 2) depicts only a generic "associated with" relationship between person/family/corporate body and work/expression/manifestation/item. This might be acceptable if the special nature of the creator-work relationship were addressed in a more focused way elsewhere, but it isn't. For example, the table of "Relationships between Persons, Families, Corporate Bodies, and Works" in section 5.3 does not even include relationships between person and work, corporate body and work, or family and work. Moreover, the use of name-title headings in examples adds

to the confusion. Name/title controlled access points in FRAD are composed of a combination of the name of the creator entity and the name of the work entity, yet name-title headings are used in section 5.4.4. to illustrate "Relationships between Works and Names" (i.e., the relationship between a work entity and the name of that work entity, which is the title portion of the controlled access point).

- **Library-Centrism:**

The task force recommends broadening the scope of the document beyond the library sector. The insistence on restricting the scope of this report to the library community seems to deny the reality of today's globally connected and networked world. The 2005 CC:DA FRAR task force pointed out that IFLA's own name would appear to condone a broader scope (i.e., International Federation of Library Associations and Institutions). This, coupled with the fact that numerous other cultural institutions such as museums and archives have the same need for authority data and authority control as libraries, provides a strong argument for making this document as accessible as possible to multiple communities. To say nothing of the need for authority control and consistency within the massive electronic databases represented by the Internet.

- **Preferring Different Forms in Different Contexts:**

The task force recommends that FRAD more fully explore the idea of allowing different forms (representing different languages, scripts, sources, etc.) for a particular entity to be preferred in different contexts, depending on user needs and preferences. We recognize that complex software might be required to bring this idea to its full fruition. We also recognize that certain vocabularies might present difficulties. For example, users of visual resources might prefer the Getty's Union List of Artist Names (ULAN) as a source rather than the LC/NAF, but ULAN doesn't really embrace the concept of a single "heading" in the way that LC/NAF does; rather it identifies "preferred names," "display names," "display biographies," "labels," etc.: [http://www.getty.edu/research/conducting\\_research/vocabularies/ulan/about.html](http://www.getty.edu/research/conducting_research/vocabularies/ulan/about.html) The "preferred name" is typically in inverted form, with last name first, and is the name appropriate for use in alphabetical lists. The "display name" is the preferred name in natural order, to be used in wall labels and other displays. A "display biography" comprises the artist's nationality, role, and dates; one of the display biographies can be designated as "preferred." The "label" form is a combination of preferred name plus preferred display biography and serves as an easily legible heading to identify the artist for end-users. How would the ULAN data elements be expressed in the FRAD model?

- Motherwell, Robert = LC/NAF established heading
- Motherwell, Robert = ULAN preferred name
- Robert Motherwell = ULAN display name
- (painter, printmaker, and author, 1915-1991) = ULAN preferred display biography
- Motherwell, Robert (American painter, printmaker, and author, 1915-1991) = ULAN label

- **Language/Style:**

The task force found many of the sentences to be long and filled with casual asides and verbose phraseology, requiring constant re-reading. This problem could easily be remedied via a strong editor or technical writer.

- **Use of Examples:**

The task force recommends specifying explicitly that the examples used in FRAD have been drawn from multiple sources and represent standards associated with different countries, institutions, rules, etc. We also appreciate the use of detailed examples in section 5 and wonder if adding some generic examples in section 3 (near figures 1 & 2) might be helpful.

- **Glossary:**

In its 2005 review of FRAR, the CC:DA task force emphasized the need for a glossary; we reiterate that sentiment in our review of FRAD. A glossary would be significantly more useful than having various specialized definitions buried within the text itself. We realize that FRBR does not have a glossary and that FRAD considers itself a parallel, or perhaps pendant, publication to FRBR. However, FRBR is written much more clearly (and conceptualized much more thoroughly) than FRAD. Any document that uses common terms in the very specific ways that this document does requires a glossary.

## II. SPECIFIC COMMENTS ON THE FRAD DRAFT

### Table of Contents

- **Duplicate pagination:** Both the t.p. and the first page of the “Contents” section are numbered “i”.
- **Unconventional pagination:** The odd-numbered pages appear on the verso of the leaves; the standard convention would be to have them appear on the recto.
- **Inconsistent use of punctuation:** The periods at the end of 3.3. and 5.3.3. should be deleted (and the same correction made within the body of the text on p. 3 and p. 35).
- **Inconsistent use of spacing:** 5.3, 5.4, and 7.4 all need an extra space inserted after the number (and the same correction made within the body of the text on p. 31, p. 42, and p. 61).
- **Inconsistent use of grammatical number:** In section 5, each of the relationship “types” listed are plural with two exceptions: 5.4.1 and 5.4.3. Was that intentional or a typo? There are multiple examples of these relationship types in each of these sections, so it would seem they should be plural (and the same correction made within the body of the text on p. 43 and p. 45).

### Introduction

- **Penultimate paragraph, 1st line:** The title *Functional Requirements for Authority Records* should be changed to *Functional Requirements for Authority Data*

### 1. Purpose

- **p. 1, General comment:** Some found sections 1 and 2 (“Purpose” and “Scope”) difficult to understand and filled with multiple terms seemingly intended to mean the same thing. (This of course is particularly ironic within a document addressing authority control). Nowhere is there a clear, concise statement introducing the title term “Authority Data.” The task force suggests that a much clearer first paragraph under “Purpose” would read something along these lines:

A catalogue is a set of organized data describing the information content managed by an institution. Authority data represents the controlled access points institutions use to collocate works by a specific person or corporate body, or the various editions of a title. Controlled access points include authorized forms and variant forms assembled by cataloguers to identify an entity. For the purposes of this study, only name and title entities are addressed; however, subject terms within catalogues are among the other entities commonly subjected to authority control. Authority control, which means both the identification of entities represented by controlled access points and the ongoing management of them, is integral to the functioning of a catalogue. Authority control is beneficial to cataloguers able to identify and distinguish between the controlled access points within a catalogue. More importantly, authority control benefits end users able to search any controlled form of an author’s name or of a title to retrieve these resources within catalogues.

- **p. 1, 1st paragraph:** The use of “author” and “works by ...” is unnecessarily restrictive here. Users aren’t interested simply in works “by” a person or body, but also works associated with them for various other reasons (that’s why we have relator terms!).
- **p. 1, 2nd paragraph:** Use of “analytical” and “analysis” in one sentence is redundant.

## 2. Scope

- **p. 1-2, General comment:** The 2005 CC:DA FRAR task force provided specific language to clarify the “Scope” section of this document. While it appears some of that language may have been incorporated, the CC:DA replacement text seems far clearer than the current 2007 draft text. Scope could start as follows (note that it seems not possible to use the word “entity” at this point because it is specific to FRAR and FRBR):

For the purposes of this study, an authority record is defined as the aggregate of information about a person, family, corporate body or work whose name is used as a controlled access point for bibliographic citations or records in a catalogue or bibliographic file. Conventionally authority data are structured in accordance with guidelines and specifications such as those set out in IFLA’s *Guidelines for Authority Records and References (GARR)*. The authority record normally contains the authorised form for the controlled access point as established by the cataloging agency, as well as variant forms and related forms also used as controlled access points. The authority record will also normally include information identifying the rules under which the controlled access points were established, the resources consulted and the cataloguing agency responsible for establishing the controlled access point. For the purposes of this study, however, there are no a priori assumptions made about the physical structure of authority data, nor are there any assumptions made as to whether the data are stored in an authority file that is separate from the catalogue or bibliographic file per se, or fully integrated with it. At a high level ... [Note: Underlined terms above were then intended to be included in the proposed Glossary.]

- **p. 2, 1st paragraph:** After the 1st paragraph under “scope” which hints at broadening FRAD’s application beyond libraries, this paragraph seems limiting. Would it fit better in Section 7, as an introductory statement? (If moved, the “however” in the following paragraph should be removed.)
- **p. 2, 2nd paragraph:** Although FRAD says “...there are no a priori assumptions made about the physical structure of authority data, nor are there any assumptions made as to whether the data are stored in an authority file that is separate from the catalogue or bibliographic file per se, or fully integrated with it.”, there does seem to be an assumption that there will *be* an authority file, and that such a file is different from the bibliographic file (whether it is “separate from” it or “integrated with” it). In a true entity-relationship database this would not be so. There would be “work” (etc.) entities and “person” (etc.) entities linked by relationships. The group of “person” entities would not constitute an authority file, even though their attributes probably would consist of many of the same things we now record in authority records. Rather

they would be a set of entities among many entities in the database, all intricately linked by relationships.

### 3. Entity-Relationship Diagram and Definitions

#### 3.3 Entity-Relationship Diagram

- **p. 4, Figure 1:** Should all except the lowest arrow be double in this diagram? Bibliographic entities can be known by more than one name/identifier; a name/identifier (or at least the name) can be used by more than one bibliographic entity; a controlled access point can be based on more than one name or identifier. According to the model a name or identifier can be the basis for only one controlled access point, so the last arrow should be single. See Figures 4 and 5 (p. 62-63).
- **p. 5, 5th paragraph, final sentence:** Why does FRAD use the phrase "... Structure of the record"? With the name change of the document from FRAR to FRAD, is this still relevant? Additionally, while the specific association in a name/title authority record is not integral to the *structure* of the authority data, isn't that association important to the *meaning* of the authority data?
- **p. 7, Figure 2:** Should the arrow from "Controlled Access Point" to "Rules" be double-headed rather than single-headed? The entity "Rules" is defined on p. 15 to include rules, rule interpretations, and coding conventions, so it seems possible for a single controlled access point to be governed by more than one set of rules. Or is "Rules" supposed to mean the composite of rules used to construct the access point (e.g. AACR2/LCRI/MARC21 taken together would form a single "Rules" entity)? Assuming that MARC21 is an example of what is meant by "coding conventions" (see comment under 3.4 "Rules") ...

#### 3.4 Entity Definitions

- **General comment:** With only one exception on the final bullet of "Expression," each bulleted statement under each of the entity definitions begins with the word "Includes ..." This is repetitive and unnecessary. Instead, at the end of the initial bullet definition for each entity, suggest inserting the phrase: "Examples include:"
- **p. 8, Person:** Suggest adding: "Includes appellations established by research (e.g., Bedford Master, Meister E.S.)"
- **p. 8, Family:** Suggest rewording as: "Two or more persons related by birth, marriage, adoption, or similar legal status, or *who* otherwise present themselves as a family."
- **p. 8-9, Corporate Body:** The art catalogers among us are delighted to see groups of artists represented here!
- **p. 8-9, Corporate Body:** See comments under "Event"
- **p. 9-10, Expression:** Suggest removing final bullet statement that begins "Excludes ...", and add the following second sentence to the current definition of Expression: "The expression entity excludes all aspects of physical form that are not integral to the intellectual or artistic realization of the work (e.g., typeface, page layout)."

- **p. 10, Manifestation:** We are pleased to see it pointed out here that “manifestation” is an abstraction. Many people seem to think that “manifestation” is where the FRBR hierarchy moves from abstract to concrete.
- **p. 11, Concept:** Are fictitious characters included? Fictitious places (e.g. Narnia, Rivendell, etc.)?
- **p. 11, Object:** Where does “form/genre” fit in? Is it considered “Object”? or “Concept” (which includes “classes of objects”)?
- **p. 11, Object:** Where do buildings fit in? Are they considered “Objects”? “Corporate Bodies”? “Places”?
- **p. 11: Object:** It seems a little silly to mention it, but inanimate objects exist that are neither “occurring in nature” nor “the product of human creation” (e.g. artwork created by animals, such as elephant paintings)!
- **p. 11-12, Event:** The distinction between “Event” and “Corporate body” is very muddled in FRAD. “Event” “includes meetings, sporting events, expeditions, etc.” (p. 11). “Corporate body” includes “groups that are constituted as meetings, conferences, congresses ... etc.” We realize the authors of FRAD tried to fudge with the first note in each category (about cataloging rules differing) but in a document purporting to define entities for a model, it would be better if the definitions didn’t overlap. FRAD did manage to define “corporate body” and “place” so that they don’t overlap — under corporate body “Arizona” is an “organization that acts as a territorial authority”; under place “Arizona” is a “geo-political jurisdiction (i.e. a geographic territory governed by political authorities).” A similar distinction could be made for the distinction between event and corporate body. The corporate body would be an “organization that convenes an event” and an event would be the event itself. Making a distinction between a corporate body and an event does not seem to be dependent on cataloging rules. Just because our own cataloging rules are also muddy on the subject doesn’t mean this has to be perpetuated in FRAD.
- **p. 12-13, Name:** The FRAD authors need to explain a little more clearly why they departed from FRBR and made name a separate entity rather than an attribute of the other entities. Defining it as a separate entity might help the FRAD model relate certain entities, but in the design of a real-life database this might make things excessively complicated. Or not. We’d have to see.
- **p. 13, Name:** Why are “Includes the title proper of the original edition of a work”, “Includes the title proper of the original manifestation of an expression” and “Includes the title proper of the original edition of a manifestation” being singled out? Wouldn’t these be examples of titles by which a work/expression/manifestation “has become known” or “has been published” (i.e., aren’t these covered already by other “Includes ...” statements)? Also, why is this FRBR-based document talking about “editions” at all? That term is so confusing that it should not be used.
- **p. 13-14, Identifier:** Some task force members find it unfortunate that the term “identifier” has been co-opted in FRAD to describe identifiers created by others, rather than identifiers created by catalogers within our own authority control systems

(see also the use of “identifier” on p. 25 and 49). FRAD allows us only the entity “controlled access point” with the attribute “preferred” to describe our own author, work, and subject identifiers (i.e. preferred headings). These members note: that catalogers work hard to ensure that our identifiers are “uniquely associated” with the entities within our context; that “identifier” is such a good term for what we are really trying to achieve when we create a heading for an entity; that we want that identifier to be readily recognizable by a user already familiar with a known entity being sought, but that we also want that identifier to characterize the entity briefly for a user who is not familiar with the entity; that we want that identifier to uniquely identify the entity and differentiate it from other different entities which might share the same name, letting the entity stand on its own in a list of many other entities that may have matched a user’s search. **Solution:** The task force discussed using an alternative term, such as “numerical identifier,” “coded identifier” or “unchangeable identifier,” to represent the current FRAD concept of identifier (ISBNs, etc.). This would allow us to reserve the term “identifier” for our own work, author, subject, etc., identifiers (which are uniquely associated with the entity at a given point in history but may be changed over time, as circumstances change). Such a rethinking of the entity “identifier” would mean either creating two separate entities (“unchangeable identifier” to represent codes, etc., and “identifier” to represent “preferred heading”) or expanding the current “identifier” entity to include the two concepts as subcategories. It would also require a rethinking of the entity “Controlled Access Point” (which is where the concept of “preferred heading” is currently defined as an attribute). The task force did not reach any consensus on these issues or on their resolution; we recommend that the FRANAR Working Group consider them further.

- **p. 13, Identifier:** One problem with the statement “A number ... that is uniquely associated with an entity ...” is that it isn’t always the case with shelf numbers.
- **p. 14, Identifier:** “Includes identifiers for items assigned by repositories (e.g. shelf number)” overlaps with “item identifier,” an attribute assigned to the entity “item” in FRBR 4.5.1: “The item identifier is a number or code that is uniquely assigned with the item and serves to differentiate that item from any other item in the same collection ... (e.g., call number, accession number, ... etc.). The number is normally assigned by the institution that holds the item.” So is an item identifier an attribute of “item” or an example of an “identifier” entity? This seems slightly sloppy. The last paragraph of the introduction to “4. Attributes” does say explicitly that “name” and “identifier” have been defined as entities in FRAD, rather than attributes, but we are slightly less convinced of the necessity of this for “identifier” than with “name” and the value of these deviations from the FRBR model is not clear.
- **p. 14, Identifier:** “Includes classification numbers referencing specific entities (e.g., a classification number assigned to a particular painting)” is puzzling. This is not art-history or visual-resources speak. Repository number would more likely be used. Rarely would a painting get classified; much more likely to be accession number.
- **p. 14, Identifier:** It isn’t clear why record numbers assigned to authority records are explicitly excluded from the definition of “Identifier.” It seems rather arbitrary. Surely these things too serve as “identifiers.” Perhaps the Working Group excluded

them so as not to box themselves in on the second part of their charge, to study the feasibility of an International Standard Authority Data Number?

- **p. 14, Identifier:** Is the LCCN associated with an authority record considered a record number? Or does “record number” refer more narrowly to the number a record has in a particular database (e.g. an OCLC number, a Voyager number, etc.)? It would be helpful if this were made more explicit.
- **p. 14, Controlled Access Point:** “Includes access points based on terms for events, objects, concepts, and places” should be “Includes access points based on names and terms for events, objects, concepts, and places” to parallel the 4th bullet under “Name” (p. 12).
- **p. 15, Rules:** What exactly is meant by “coding conventions”? Does this mean encoding conventions used to store and exchange data (e.g., MARC21) or does it refer to the manner in which a set of rules assembles data or records? This needs to be clarified.
- **p. 15, Agency:** Why is this entity needed? Wouldn't “agency” always be a “corporate body”? How is it different from the entity “corporate body” (granted, it would be a subset, but there seems to be nothing outside of “corporate body” that would be an “agency”).

#### 4. Attributes

- **General comment:** The task force has identified areas where entities are confusingly also defined as attributes of other entities (e.g., place associated with the corporate body, place of origin of the work, places associated with the family, etc., and the “concept” entity shows up as an attribute in field of activity of the corporate body, subject of the work, etc.). These areas seem to demonstrate the lack of conceptual rigor within the FRAD model.
- **p. 15-16:** The introduction to this section goes to great lengths explaining that the current draft does not extend beyond a certain level of detail, or pursue the entity-relationship model rigorously enough to be most attractive to people working extensively with authority data. Why? That is, why not apply authority data in great detail (as is needed within today's Information Age environment) and why not apply the model to the degree that authorities librarians would find it most useful (e.g., as individual data elements that may be assigned and assembled to illustrate complex relationships among entities)?
- **p. 16, Last line:** “Through the relationship, however, the attributes of name and identifier function in the same way as if they were defined as attributes of the associated entity.” If so, why make them separate entities?

##### 4.1 Attributes of a Person

- **p. 17, Other designation associated with the person:** “Includes designations such as “Jr.”, “III”, etc. when associated with ... a surname” — why limit this to names

that include surnames? What about royal persons whose names include numbers, e.g. Henry VIII? Also, there is a blind reference to “number” under 4.12)

- **p. 17, Gender:** There should be some possibility of identifying a person’s gender as “unknown” or “other” or whatever.
- **p. 17, Address:** The fact that an individual’s address can change over time should be reflected in the model. Adding “current or former” before “place of residence” would fix this problem (a “former residence” could also apply to someone who is now deceased).

### 4.3 Attributes of a Corporate Body

- **p. 18-19:** “Number” (FRBR 4.7.2) is not included as an attribute here. Rather in FRAD “number” is part of the definition of the entity “name” (p. 13). It’s very hard to tell in FRAD what it’s deliberately changing and what it’s just not mentioning, since FRAD routinely leaves out FRBR attributes and bits of FRBR definitions that FRAD doesn’t consider relevant to authority data. It would be extremely helpful and more forthright if the Working Group signaled somehow those places where they are making deliberate changes from FRBR (as here, where one of us just happened to notice the discrepancy with “number”).
- **p. 18, Place associated with the corporate body:** Suggest combining bullets 2-3. Also, is the list limited to jurisdictions or could it be any geographic place name?
- **p. 18, Place associated with the corporate body:** Just as greater clarity is needed in the entity definitions of “corporate body” and “event” (see comment under 3.4), so greater clarity is needed in the definitions for their corresponding “place” attributes. The attribute “place associated with the corporate body” contains much of the same language as “place associated with the event” under 4.10.
- **p. 18, Place associated with the corporate body:** Why is this an attribute at all? Place is separately defined as an entity. Wouldn’t it make sense under FRBR/FRAD entity-relationship to consider “place” an entity with a relationship to the entity “corporate body”? We realize under the ER model there is leeway in what you define as an entity and what you define as an attribute, but since FRBR/FRAD has *already* defined “place” as an entity it seems less than careful to then turn around and make place also an attribute in some cases. Same comment for other entities that have place defined as an attribute (e.g. Family).
- **p. 18, Date associated with the corporate body:** Just as greater clarity is needed in the entity definitions of “corporate body” and “event” (see comment under 3.4), so greater clarity is needed in the definitions for their corresponding “date” attributes. The attribute “date associated with the corporate body” contains much of the same language as “date associated with the event” under 4.10. This all could be resolved if FRAD distinguished clearly between corporate body and event.
- **p. 19, Address:** Because a corporation can relocate, should the potential for a changed address be reflected in the model? Adding “current or former” before “address” in the first line would fix this problem.

- **p. 19, Field of activity:** Wouldn't this be a "concept", a separately defined entity? Since "concept" is formally defined in FRBR/FRAD, it seems odd that it is now being used as an attribute rather than an entity related to the entity "corporate body."

#### 4.4 Attributes of a Work

- **p. 19, Date of the work:** Because the first line broadens the definition to "associated with the work", suggest renaming the attribute "Date associated with the work." A similar attribute name is used for other entities.
- **p. 20, Medium of performance:** In the first definition, the phrase "originally conceived" appears. This is fine; however, nothing about musical arrangements appears in FRAD. We assume that the arranged medium of performance (say the orchestration of Mussorgsky's Pictures at an exhibition), is an attribute of an expression. Perhaps this is too detailed to put in the model? We also wonder if there is a reason this attribute is limited to musical works. Couldn't this attribute apply to other performed works such as choreography, theatrical works, etc.? That said, medium of performance may be critical to identifying a musical work (say, sonata #1 for piano vs. sonata #1 for violin), but is probably less critical in identifying other kinds of works.
- **p. 20, Subject of the work:** Again, this is an entity in FRBR/FRAD: "concept" (or actually any of the FRBR entities can act as the subject of a work/expression/manifestation/item). Also, classification numbers are defined in "identifier" as an entity in FRAD, are they not? This should be treated as an entity related to the entity "work" and not as an attribute of "work."
- **p. 20, Numeric designation:** Perhaps some clarification is needed here; this includes serial numbers, opus numbers assigned by the composer, etc., but apparently *not* thematic catalog numbers, which are given as examples of "identifier"? Is that because thematic index numbers are not assigned by the composer?
- **p. 20, Key:** Same comment as under "Medium of performance" above, if the original musical work has been transposed.
- **p. 20, Place of origin of the work:** Again, "place" is a formally defined entity in FRBR/FRAD, and as such shouldn't it be treated as an entity in relationship to the work, not as an attribute of work?
- **p. 20, Original language of the work:** At least one task force member was a bit uneasy with this attribute, noting that, although the attribute has a certain utility, the "work" entity is abstract in FRBR and is not associated with any particular language (e.g. "Ancient Greek" is the language of the first expression of the Iliad, but not the language of the work, which encompasses what all of the expressions have in common). Others thought that an original language attribute *was* appropriate for "work" (for textual works, anyway), that all expressions of a work do have the same "original language" even if the language of the expressions themselves can differ, and that the attribute is necessary for determining whether or not the expression represents

a translation. It was suggested that the attribute would not be appropriate for a “superwork” entity, were one to be defined.

- **p. 21, Other distinguishing characteristics:** “Includes musical incipits.” This only works if incipits are considered “concepts”, but most people tend to think of them more in a print format (and thus they would fall into the “expression” category, since they’d be notated?). The *New Harvard Dictionary of Music* gives the following as the first clause in the definition of incipit: “The first few words and/or notes with which a work of literature or music begins ...”
- **p. 21, Note:** “The attributes of a work listed above include only those that are normally reflected in controlled access points or in other data elements recorded in authority records.” If that is the aim of this section, then suggest two additional attributes need to be added to both the Work and Expression entities: “source of data” and “treatment decisions”. As both Works and Expressions are conceptual entities, it is important for users (especially other catalogers) to know whether the Work/Expression title is taken from a self-describing resource or created by another cataloger. And while it is understood that treatment decisions for Works and Expressions often vary from institution to institution, it is important for catalogers creating authority records to know that this attribute is commonly recorded in records and shared among institutions.

#### 4.5 Attributes of an Expression

- **p. 21:** Same comment as under “Attributes of a Work” above (p. 21, Note).

#### 4.6 Attributes of a Manifestation

- **p. 22, Edition/issue designation:** Once again, the flawed mapping of data elements to entity types in FRBR causes logical problems. Edition statements which clearly indicate a change in expression (“difference in content”) are listed as attributes of the manifestation. **Solution:** Unfortunately, the solution to this problem is a change to FRBR itself (and therefore, it probably will not be solved). Ideally, the definitions in FRBR would be retained and the tables in the back of FRBR that purport to link elements of the description to particular FRBR entities (nearly always manifestation) would be dumped. It has never been the case, anyway, that an element of the description was linked to a particular FRBR entity. The title could be the title of the work, the title of the expression and the title of the manifestation, or only one of the above, depending on the circumstances.
- **p. 22, Edition/issue designation:** Would it make sense to consolidate this attribute and the “Numbering” attribute? Their purpose seems the same, only one is written more specifically for monographic resources (Edition/issue designation) and the other for serial resources (Numbering). Also, as we’ve noted elsewhere, the term “edition” is an especially loaded term and extremely problematic within the FRBR lexicon. We recommend removing this term from FRAD and replacing it with clear, direct language in each place it occurs.

#### 4.7 Attributes of an Item

- **p. 23, Location of item:** It isn't clear why this is a necessary attribute to add to the model. How does it advance the goals of FRAD? What does the location of an item have to do with authority data? Furthermore, "the collection or institution in which the item is held" could/would/should be recorded as another entity (i.e., corporate body for a library, museum or archives, etc., personal name for a private collection). This then represents another entity-to-entity relationship (and another example of the flawed conceptualization of the FRAD model).

#### 4.9 Attributes of an Object

- **p. 23, Date of production:** Why "(normally a year)"? Objects are probably less likely to be done in one year than books. In 4.4, the dates of a work are separately bulleted for the first date and also "Includes single dates and ranges of dates" (and same for expression).
- **p. 24, Note:** While the note does imply that we shouldn't expand this to CCO length, "Place of production" seems especially skimpy. There is also place of repository which may be a critical component for identifying an object (particularly a cultural object).

#### 4.10 Attributes of an Event

- **p. 24, Place associated with the event:** See comment under 4.3 "place associated with the corporate body". Also, note that although 4.3 includes places associated with events, 4.10 does not include the parallel corporate bodies associated with events.

#### 4.11 Attributes of a Place

- **p. 24:** In addition to the "Other geographic information" attribute, intended only for geographical data, we recommend that this entity should also have a "History" attribute. Certain cultures and communities assign importance to places based on events that take place there. Other cultures or later observers may be completely unaware of such significance if it is not recorded. For example, consider the culture-specific significance assigned by many Americans to places like Plymouth Rock (Plymouth, Mass.) or Valley Forge (Pa.).
- **p. 24:** Places are inherently related to their hierarchy or jurisdiction; should these be made attributes? The attributes of a corporate body (4.3) don't cover place name as jurisdiction. Should that be covered here?

#### 4.12 Attributes of a Name

- **p. 24-25:** An important attribute is missing: the words/characters constituting the name itself. The entity "Identifier" has as one of its attributes "identifier string," which is the actual alpha-numeric characters in the identifier. The same is needed here, perhaps an attribute called "name string" (e.g., "Bob Maxwell" would be a "name string"). As defined, nowhere does "name" actually have a name!
- **p. 24-25:** This entity is a little confusing. Is this to take care of such things as bibliographic identities? Many of the attributes assigned to this entity in the first

FRAR draft have been removed and reassigned as necessary to other entities. Is this entity still necessary?

- **p. 24, Type of name:** The included types do not include the types listed under “Name” on p. 12-13, specifically events, objects, concepts, and places.
- **p. 25, Scope of usage:** This should be an attribute of “person”, “corporate body,” “family,” etc., *not* of “name”. Since a name can be used by more than one person (corporate body, family, etc.) (see FRAD Figure 4, double arrows going from “name” to the FRBR entities with the “known by” relationship) the entity “name” does not apply to any given person. Therefore it is inappropriate to record an attribute of an individual person as an attribute of the entity “name.”
- **p. 25, Dates of usage:** Same comment as “scope of usage” — actually, this would be an attribute of the *relationship* “known by” connecting the person/corporate body, etc. with the entity “name” because it tells *when* the person/corporate body, etc., was “known by” the name. But since FRBR/FRAD doesn’t define attributes for relationships (departing from ER theory), it would have to be an attribute of the person/corporate body, etc. In any case, *not* an attribute of the entity “name” which is independent of any individual person/corporate body, etc. Having these two attributes (Scope and dates of usage) under “name” is a serious error.

#### 4.14 Attributes of a Controlled Access Point

- **p. 26-28:** Wouldn’t many, most or all of the attributes described for the “Controlled access point,” “Rules,” and “Agency” entities (4.14-4.16) need to be inherited by each of the preceding entities (4.1-4.13) similar to the way that FRBR Expressions, Manifestations and Items inherit the attributes of the Work they represent? If that is the case, shouldn’t these three final entities exist at a higher conceptual level in order to preserve this inheritance relationship?
- **p. 27, Base access point:** Shouldn’t this attribute be moved to precede attributes such as “Language of base access point” (p. 26) that make use of the concept? It is confusing for the reader not to have this term defined until the page following its first use.
- **p. 28, Addition:** Shouldn’t this attribute be moved to precede attributes such as “Language of cataloguing” (p. 26) that make use of the concept? It is confusing for the reader not to have this term defined until the page following its first use.
- **p. 28, Addition:** “Includes a number associated with a corporate body or a musical work added to the base access point.” At least for musical works, the number really should be part of the base access point. For a title like Symphony no. 2, the numbering is critical in identifying the work. **Solution:** move the musical work reference to the list under “base access point.”
- **p. 28, Note:** We are disheartened to see that FRAD is disregarding the “Role of the entity” as an addition to Controlled access points. The CC:DA Task Force on Rule 21.0D report (<http://www.libraries.psu.edu/tas/jca/ccda/docs/tf-210d2.pdf>) was quite clear in its insistence upon the importance of relator codes in building truly semantic,

robust catalogs. Some years ago, after initially embracing the use of relator codes to help bridge the distance between authority and bibliographic data, CC:DA rescinded the task force's recommendation and decided to wait for the JSC to determine what role relator codes would play within RDA. If FRAD too now chooses to overlook or disregard the importance of relationship information within our increasingly complex data, the likelihood of RDA leading that charge appears lessened indeed.

#### 4.15 Attributes of Rules

- **p. 28-29:** See first comment under 4.14 (Attributes of a Controlled Access Point)

#### 4.16 Attributes of Agency

- **p. 29:** See first comment under 4.14 (Attributes of a Controlled Access Point)
- **p. 29, Name of agency:** It is very bizarre to say the least suddenly to have an entity with an attribute "name", since all the other entities defined in FRAD very carefully do *not* have such an attribute, but instead have a "known by" relationship with the separately defined entity "name."

### 5. Relationships

#### 5.1 Authority Relationships in the Context of the Model

- **p. 30:** Recommend reorganizing these paragraphs to more clearly identify the four broad categories of relationships mentioned. It is confusing that the 1st, 2nd, and 3rd categories are referenced in the 1st paragraph, and the 1st, 2nd, and 4th referenced in the 2nd paragraph.

#### 5.2 Relationships Depicted in the High-Level Diagrams

- **p. 30, 3rd paragraph:** We were surprised to see "item" in this list. When would we ever create a name-title authority record that only represents an item? According to the note under "Manifestation" on p. 10, even if the physical embodiment of an expression of a work involves the production of only a single artifact, the manifestation comprises that single artifact.

#### 5.3 Relationships between Persons, Families, Corporate Bodies, and Works

- **p. 31, Table 1:** This table has a rather ambiguous title that at first seems to promise to diagram the possible relationships between a person and a work, but on closer examination, does no such thing. The text on p. 31 suggests that "terms added to controlled access points ... may reflect the specific nature of the relationships between a person, family, or corporate body and a work." **Solution:** Clarify. One task force member writes "I suspect this will receive some negative comment from the field, but as someone who has been working with relator terms for moving image materials for years, I am dubious about the possibility of gaining complete control over the myriad of ways in which people and corporate bodies can be related to works and the myriad of ways in which publishing agencies can be ambiguous about the

relationships on title pages or title frames. Certainly we need to record the relationships when known, but transcription is our (and our users') best friend in this regard."

### 5.3.5 Relationships between Corporate Bodies

- **p. 37, "Journée" example:** The "Translation" field is missing its closing square bracket. Also, the word "11<sup>e</sup>" should be "11<sup>e</sup>" (if the example is to match the BnF authority record, from which it seems to have been taken). If the heading/reference were constructed according to LC/NAF rules, the qualifiers would use "Nancy, France" rather than "Nancy" and the punctuation within the qualifiers would be <space colon space>; but we assume that LC/NAF rules do not apply.

- **p. 38, "Technical Thick Film Symposium" example:** In this example, each individual meeting of an ongoing conference has been established under its own distinctive name, but oddly an ordinal number has been added as a qualifier to each distinctive one-time name. Wouldn't an ordinal number only make sense within the context of a "see reference" (not intended to be shown in this example) from the general (ongoing) conference name to the distinctive one-time name, like this?:

*Authorized Heading:* Distinctive Name (date : place)

*See Reference Tracing:* General Name (ordinal number : date : place)

Also, if this example is intended to conform to the conventions of a specific authority file, it would be good to verify whether or not those conventions call for putting superscript characters in ordinal numbers "on the line." We weren't sure if the superscript formatting was intentional or an example of a word processor program trying to be "helpful".

### 5.3.6 Relationships between Works

- **p. 38-42:** This section lumps expressions with works and further muddies the waters concerning FRBR definitions. For example, the so-called "equivalence relationship" is actually a relationship between two different manifestations of the same expression of the same work. The so-called "derivative relationship" is applied to both the relationship between two different expressions of the same work, and to the relationship between two related works. The "sequential" relationship should also be seen to apply to certain expression-to-expression relationships currently lumped under the "derivative" relationship, namely that between an earlier and a later revised edition. Only the "descriptive", "whole/part," and "shared characteristic" relationships seem actually to be pure cases of "relationships between works."

**Solution:** 1) Create a section for manifestation to manifestation relationships and place the "equivalence relationship" there. 2) Create a section for expression to expression relationships, and include there the "derivative expression" relationship. Change "Derivative relationship" to "Derivative work relationship." Also include there the "sequential expression" relationship. Change "Sequential relationship" to "Sequential work relationship." Or perhaps it might be simpler simply to title this whole section "Relationships between Works, Expressions, Manifestations, and/or Items". Whatever changes are made would also have to be reflected in 5.3.

- **p. 39, Equivalence relationship:** The language “This is a type of shared characteristic, where the characteristic in common is the work” is erroneous or at the very least misleading. On p. 42, “Shared characteristic relationship” is defined as “The relationship between two works/expressions/manifestations/items that have some characteristic in common, *apart from any of the other relationships*.” This explicitly excludes “equivalence” from the category of “shared characteristic” by FRAD’s own definition. Also, as Barbara Tillett has explained in her writings on the subject, categories within a taxonomy must be mutually exclusive, with no overlap between them. Therefore an equivalence relationship is *not* a “type of shared characteristic” relationship. It would be better just to leave this sentence out.
- **p. 39, Equivalence relationship:** Consider adding the following final sentence: “For serials published in multiple manifestations, this relationship is often expressed in bibliographic data through the use of a controlled access point for the preferred form of name for the original work with additions, or qualifiers, to distinguish identifying characteristics of each manifestation.”
- **p. 40, “Poe” example:** Typo: the word “Debssy” in the see reference should be “Debussy”
- **p. 42, Shared characteristic relationship:** The parenthetical examples are rather arcane. Why not include two of the “shared characteristics” most commonly encountered by library users: same author/creator, and same title?

#### 5.4 Relationships between Names and Persons, Families, Corporate Bodies, and Works (“Known by” Relationships)

- Structurally, is it necessary to have the reciprocal definitions, such as “secular name relationship” vs. “name in religion relationship” (p. 43), “earlier name relationship” and “later name relationship” (p. 44), and “expanded name relationship” vs. “acronym/initials/abbreviations relationship” (p. 45-46)?

##### 5.4.1 Relationship between Persons and Names

- **p. 43, Real name relationship:** In the 1st sentence: “uses his of her real name” should be “uses his or her real name”
- **p. 43: Pseudonym relationship:** Stage names are not pseudonyms! Actors change their names permanently, just as married women do. They do not intend for their work to be fragmented under the various stage names they have used. **Solution:** Since the term pseudonym is associated with multiple bibliographic identities (which are actually dealt with in section 5.3.1, not here), it would be less confusing here if instead of calling this a “pseudonym” relationship, it were called an “assumed name” relationship, or some such. In general, it needs to be made clearer in this section that here we are dealing with a single entity that may have several names, while in section 5.3.1 we are dealing with a situation in which a change of name actually creates a new entity (a situation we should try to minimize in future! Catalogers should be figuring out ways to do more lumping, not more splitting. Soon we will be listing a

given entity under whatever variant appears in the item being cataloged and there will be no difference between cataloging and Google. The frequency with which Anglo-American catalogers consider change of name to be change of identity works against international cooperation in authority control (see p. 64). There would probably be much greater agreement on entity definition if we stopped foisting this artificiality on our users. It was originally developed for the convenience of the cataloger, not the convenience of the user, and it is doubtful whether it even serves that goal any longer.)

- **p. 43:** The pictograms under “Real name relationship” and “Pseudonym relationship” are effective but each of these sections would be clearer and more accessible for catalogers if an authority record example for each of these types were included as well. The 1st draft of FRAR included authority record examples for each type including these two. The only categories that should not include authority record examples are those stating that the relationship or data is “rarely expressed in authority data.”
- **p. 45, Other variant name relationships:** Take the text of the 2nd paragraph and include it (edited accordingly) within the “Other variant name relationships” categories in sections 5.4.3 and 5.4.4?

#### 5.4.2 Relationships between Families and Names

- **p. 45:** Why isn’t “Other variant name relationships” one of the relationship types for family to name as it is for person or corporate body to name? Surely FRAD isn’t implying that a variant name means a new entity? Or is this just an “alternative linguistic form”? If so, why not just lump all the person to name relationships under this heading as well? (See also Table 2, where this relationship needs to be added.)

#### 5.4.3 Relationship between Corporate Bodies and Names

- **p. 45-46:** Since “Relationship between Persons and Names” has relationship types “earlier name relationship” and “later name relationship” it seems surprising that “Relationship between Corporate Bodies and Names” does not have such a relationship type, especially since FRAD claims to be rules-neutral. It is certainly conceivable that a cataloging code could treat corporate bodies differently than our own does and not consider a corporate body name change to create a new corporate body, but rather consider it the same body with an earlier and later name.
- **p. 46, Pseudonym relationship:** Typo: there are two periods/full stops at the end of the 3rd sentence.

#### 5.4.4 Relationships between Works and Names

- **p. 47, 1st example:** The second e in “Pentekostarion” is a transliteration of the Greek letter eta and so needs a macron (long mark) over it.
- **p. 47, “Shakespeare” example:** Seems like there should be a comma after “Hamlet” in the see reference. The LC/NAF reference doesn’t have the comma, though some of the other references do. Perhaps it should be left as is, to match the LC/NAF record.

## 5.5 Relationships between Controlled Access Points

- **p. 48, paragraph above Table 3:** The two sentences in this paragraph are difficult to understand. They also appear to bear little relationship with one another so I'm not certain they belong in the same paragraph.
- **p. 49, "Buddha" example:** In the heading/reference "Guatama" should be "Gautama" (three instances)
- **p. 49, "Austen" example:** Is this the accurate International Standard Text Code for Austen's "Pride and prejudice"? An example of an ISTC code on the ISO website is: "ISTC 0A9-2002-12B4A105-6"; the "nnn..." code in the Austen example appears to be a placeholder.

## 6. User Tasks

- **p. 50:** FRBR has a much broader definition of users: "The study assumes that the data included in bibliographic records produced for national bibliographies and library catalogues are used by a wide range of users: readers, students, researchers, library staff, publishers, distribution agents, retailers, information brokers, administrators of intellectual property rights, etc." (FRBR, p. 8, 1st paragraph). Would a broader definition also be useful here?
- **p. 50-55, Table 4:** It is difficult to interpret the mapping in Table 4. Unlike FRBR, there is only one symbol, a black box. In FRBR the symbols in Table 6 mean "high value", "moderate value", "low value". There is no explanation in FRAD of the meaning of the black box. Does it mean something like "of value" as in "The 'known by' relationship is of value to the user task 'find' for the entity 'person'"? The paragraph after the user tasks on p. 50 offers no explanation at all either as to what the black box means or how the Working Group arrived at its conclusions (whether to place a black box in the grid or not). Assuming it means "of value," why is the "known by" relationship not thought to be of value for identifying, contextualizing, and justifying the entity "person"? At least for justify, the "known by" is the supreme reason justifying the name — "documenting the authority record creator's reason for choosing the name or form of name on which a controlled access point is based." That particular relationship — the name by which the entity is "commonly known" — is the most important justification of all. So why isn't there a box in the intersection of "justify" to that relationship? Why aren't there boxes in the intersection of "contextualize" to attributes like "gender," "place of birth," "place of death," "affiliation," "field of activity," etc.? All of these contextualize: "place a person, corporate body, work, etc., in context ..." We have not analyzed the whole table, but in general are not sure why the Working Group assigned black boxes to some intersections on the table and not to others.

## 7. Authority Data in the Library Sector

- **p. 56-63:** It is good that this section has been moved to the end of the report in this draft (from near the front of the report in the first FRAR draft), although we are still troubled that this report remains so library-centric. Perhaps there is a need to describe

the current library cataloging process, but the reason isn't made clear. It seems preferable to broaden the scope of this section.

- **p. 56-63:** Though relocated from its placement in the 1st FRAR draft, the section has been revised very little if at all. This is discouraging in light of the practical revisions suggested by the first CC:DA task force in 2005. Incorporating some of those revisions would not only improve the readability of the document, but would also reflect current practices and initiatives absent from this 2nd draft.

## 7.2 The Functions of the Authority File

- **p. 58-59:** One of the challenges that we face in the new millennium is that of designing systems that allow users to indicate a preference for a particular language, transliteration scheme, and/or script, which can then drive the switching of preferred access points from the default for the catalog to the user's preference. This model alludes to that need (p. 59, p. 61), which is commendable, but it does not yet seem to be designed to facilitate such a system, although the definition of "rules" and "agency" as entities, and the addition of language, script and transliteration scheme as attributes of a controlled access point are a start. **Solution:** In order to do this effectively, perhaps we need to add the user as an entity, so that a total context for a "preferred" form can be made up of the combination of rules, agency, and user preference. We also need to ensure that each entity has a preferred form designated for every possible combination of rules, agency, and user preference. Perhaps this is so complex as to be impossible for us to accomplish, but if we want to accomplish it, we need to begin to experiment with more complex models than this present one.
- **p. 58, Document decisions, 2nd sentence:** "In addition to recording the authorized and variant forms of controlled access points per se ...". But "controlled access points" encompass both preferred and variant forms, so how can there be variant forms of controlled access points? Recommend rephrasing this sentence for clarity, something along the lines of: "In addition to recording controlled access points, including the preferred and variant forms ...".
- **p. 58, Document decisions:** This would be an appropriate place to make specific mention of series authority records and the fact that catalogers use SARs to determine how or if they need to trace series associated with a resource.

## 7.3 Authority Files in a Networked Environment

- **p. 59, 3rd sentence:** This sentence speaks of "authority files created by national bibliographic agencies ..." On the one hand, something like the Getty vocabularies are not authority files. On the other hand, one can export those records to your local authority file.
- **p. 60:** In the three paragraphs discussing "the interaction between [authority] files," it is important to acknowledge and describe the need to maintain authority files through time. Determining if an authority record matches an existing record in one's local catalog is not a simple either/or situation. If the incoming authority record has been subsequently updated or revised by another institution, most institutions will want to

overlay or replace their older record with the revised authority record, not discard the “fuller” record as a duplicate of an existing record. There is also the similar instance wherein some ILMs systems generate minimal or provisional authority headings for access points used in bibliographic records that have no corresponding full authority record. For such institutions, the need to plan accordingly when loading files of authority records intended to overlay and replace these minimal-level local authority records should be documented in this FRAD document.

#### 7.4 Authority Records in the Library Sector

- **p. 61, 2nd paragraph, 2nd sentence:** This sentence appears to refer to this section of the FRAD report as a formal Appendix, but it is not called an appendix either at the beginning of Section 7 or in the Table of Contents. It is only referred to as Part II. Should the word appendix be removed or revised? (Note: In the 1st draft of FRAR there was an appendix – this text may reflect that earlier report’s organization).
- **p. 61, final paragraph:** This paragraph tends to use the word “form” when figure 5 on p. 63 uses “heading” — the phrases “authorized form”, “preferred form” and “variant form” come up in the text. These should be changed to reflect the language used in figure 5 to lessen confusion.
- **p. 63, Figure 5:** Several entities shown in the figure are not defined in the document. These are “uncontrolled access point,” “authorized heading,” “variant heading,” “explanatory heading,” “authority record,” “reference record,” “explanatory record.” Even if FRAD doesn’t want to treat these in detail, if these entities are going to appear as entities in a figure they need to be defined. It’s not enough to say on p. 61 that “the terminology used and the definitions of these entities largely correspond to those used in *Guidelines for Authority References and Records* and are not repeated here.” (In any case “these entities” in that particular sentence appears confusingly to refer back to “rules” and “agency, which *are* defined in the document.) And the fact that “reference records” and “general explanatory records” are not usually found in electronic catalogs is irrelevant to the model as described in Figures 4 and 5. “General explanatory record” does not even appear in either figure. The missing definitions could be as simple as how the “new” entities found in Figure 6 are defined on p. 65.
- **p. 63, Figure 5:** It isn’t clear how an “uncontrolled access point” is relevant to authority data. In the FRAD model, it has been a struggle understanding that controlled access points encompass both preferred and variant forms and that the entity “name” is not required to be unique (while “identifier” is). How does “uncontrolled access point” fit in?

#### 8. Authority Data Transfer

- **p. 64-67:** Though relocated from its placement in the 1st FRAR draft, the section has been revised very little if at all. This is discouraging in light of the practical revisions suggested by the first CC:DA task force in 2005. Incorporating some of those revisions would not only improve the readability of the document, but would also reflect current practices and initiatives absent from this 2nd draft.

## 8.2 Cross-Sector Sharing of Authority Data

- **p. 65-66:** In describing the five entities in Figure 6 from the <indec> model, where does the term “primitive” come from? We aren’t familiar enough with the <indec> documentation and model to know if that is a self-applied term. If it is not taken directly from the <indec> model, it is pejorative and should be removed from this report. If necessary, perhaps replace it with “fundamental entities” or “core entities”, etc. If it is from the <indec> model, perhaps make this clear?