

**TO:** Elena Escolano Rodríguez, Chair, ISBD Review Group  
John Hostage, Information Coordinator, IFLA Cataloguing Section

**FROM:** Lori Robare, Chair, ALA Committee on Cataloging: Description and Access

**RE:** ALA response to the worldwide review of *ISBD: International Standard Bibliographic Description, 2010 Consolidated Edition*

## Table of Contents

<b>Introduction</b>	1
<b>General Comments on the whole document</b>	2
<b>Older Monographic Resources</b>	2
<b>Issues by area</b>	5
Introduction	5
General chapter A	5
Area 0	5
Area 1	7
Area 2	10
Area 3	10
Area 4	12
Area 5	13
Area 6	13
Area 7	13
Area 8	15
<b>Appendices</b>	
A	15
C	16
D	16
E	17
<b>Errors</b>	20
<b>General style</b>	21
<b>Suggestion for changes in wording</b> [from Table of Contents to 3.3]	21

## INTRODUCTION

The ALA Committee on Cataloging: Description and Access appreciates the opportunity to comment on the *ISBD: International Standard Bibliographic Description. 2010 Consolidated Edition*. In order to review the document in a timely and thorough manner, a Task Force was charged to do the review and issue a report. The Task Force's report was discussed, amended, and adopted by the full CC:DA membership.

The Committee is grateful for an extension of the deadline by which comments were due and believes that the extension has resulted in more thoughtful and better-organized comments. The report is structured so that comments proceed from general to specific and from issues to errors to general style to specific suggestions for wording.

## GENERAL COMMENTS ON THE WHOLE DOCUMENT

The ISBD is very clearly written and structured. The introduction and thought would be clearer if the writers incorporate the tasks listed in the Functions of the Catalogue, section 4 of the Statement of International Cataloguing Principles, namely, to find, select, identify, acquire or obtain, navigate. In particular, it would help to know what task is being served by the various areas.

<i>Issue</i>	<i>Comment</i>
Issues in the examples	Overall, there is a range of languages represented in the examples, but some languages were “privileged” by their prominence (especially English, although this is expected, since the overall text is in English, arguably the present day’s lingua franca). Other European languages were less represented (e.g., Scandinavian, Finno-Ugric, Baltic, and Slavic languages), some surprisingly so (i.e., Spanish, Italian). There are few non-roman examples other than CJK, only one in Cyrillic and one in Greek. Where are Arabic, Hebrew, African and other “Asian” languages and scripts (understood in the broadest way, so as to encompass languages such as Urdu, Sanskrit, Thai), etc.?

## OLDER MONOGRAPHIC RESOURCES

Since there are a number of issues related to the treatment of early resources in the ISBD, we have treated them together, inasmuch as some of the same principles are involved in the different issues. The general recognition that early resources require some different treatment is appreciated, but it is not always clear that the group understands the nature of early materials and the reasons why special treatment is needed. One major point is that because early materials are often studied at a more detailed level than that of the manifestation or edition, greater granularity is necessary to fulfill the FRBR tasks of Identifying and Selecting the appropriate resources to access.

The term Older Monographic Resources needs some revision; in particular, the term “Monographic” in Older Monographic Resources needs to be rethought. After many years of trying to catalog early serials under existing standards and rules, the American community came to create a separate set of rules for rare serials, which pose unique issues of transcription and standardization and incompleteness of available information. Rules are currently being drafted for other early graphic, cartographic, and musical materials, and it is apparent that the term “title page” is not always appropriate for these materials.

The Glossary defines **older monographic resources** as, “chiefly those resources produced prior to the introduction of machine printing in the nineteenth century and include those published for the market as well as those printed in few, or even single copies, for private or limited distribution.” Does this include incunabula? The Anglo-American special collections cataloging community has had to expand the reach of its Descriptive Cataloging of Rare Materials series to include nineteenth century materials because scholars are beginning to find the sort of detail used to describe hand-press materials are useful in studying the history of books, publishing, authorship, popular culture, gender, etc. One can argue the term “older” might appropriately refer to those machine printing methods that pre-date the beginning of electronic publishing and printing techniques (i.e., created either by electronic means or for electronic media). At the least, the ISBD might refer to “older resources” instead of “older monographic resources.” A move past incorporating ISBD(A) into a consolidated edition to a thorough rethinking of ISBD’s approach to “older” materials would be even better. Such an approach would examine more carefully the

reasons for the special rules required to describe such resources so that the user community may discover and select them.

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
A.5	812-819	The final sentence references Section A.6.6. There is no Section A.6.6 in the current draft.
1.3.4.7.1	2001	There is a “[sic]” after the word “dramme” in the French parallel title. This is not a mistake but simply an alternative spelling during a period when orthography was considerably freer. Therefore, there is no need for the [sic]. DCRM rules take the stance that spellings found in works prior to the days of stricter orthographical standards are not mistakes, just one of many ways to spell things; and ISBD should do the same. (Cf. par. 2 of DCRM(B) 0G7.1.)
1.2.5.2	1699-1700	Several adjectives in the German language parallel title are capitalized that should not be. This violates the provision in “1.1.5.1 The title proper is transcribed from the prescribed source of information exactly as to wording, but not necessarily as to capitalization or punctuation (see also A.7).”  The Prescribed Source for Older Monographic Resources is the title page, which means that everything else has to be put in brackets. This is a problem in Areas 1, 2, 4, and 6 because early materials, particularly those of the incunabular period and sixteenth century, may have the information relating to those Areas in places (not just one place) other than the title page (if there is one).
Area 2	2797	Prescribed Sources, Older monographic materials , Given the divergent practices of early printers, especially during the period when the title page was being developed, it would be more useful to follow the provisions of DCRM(B) 2A2: “the title page, other preliminaries, colophon, . . ., in that order of preference. If an edition statement or any part of the edition area is transcribed from elsewhere than the title page, indicate its source in a note.” That would distinguish an edition statement in the resource from a statement supplied as part of 2.1.3 or from an unusual location within the resource. Such a practice would improve the interchangeability of bibliographic records that are quite expensive to create. The same is even truer for Area 4, Introductory note, lines 3541-42.
2.1.2	2923-2925	“When the edition statement is taken from any other source, standard abbreviations may be used and arabic numerals are substituted for other numerals or spelled out numbers.” This is fine if the prescribed source includes the other places suggested in the previous comment. Otherwise, the rule should be changed to “When the edition statement is taken from outside the resource, standard abbreviations may be used and arabic numerals are substituted for other numerals or spelled out numbers.” If the prescribed source is not changed, , the ability to distinguish similar but not identical editions may be lost to the user.

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
Area 4	3541-42	Prescribed Sources for Older Monographic Resources, Title page only for “older monographic resources” is unfortunate as it will lead to unnecessary bracketing of information. See the note on line 2797.
Area 5	4520-5355	None of the examples of older resources were other than print. Something taken from an early graphic or serial would be helpful.
Area 6	5345-5426	Introductory note, Prescribed Source, Older Monograph Materials. Naturally the series t.p. should be the prescribed source of information for an older series, but, again, it would be better to follow the provisions of DCRM(B) 6A2: “The prescribed sources of information for the series area are the series title page, monograph title page, cover, dust jacket, and rest of the publication, in that order of preference. If the publication has both main series and subseries titles, however, prefer a source containing both titles.” And DCRM(B) rule 6A2.2. “If the series statement, or any of its elements, is taken from a source other than the series title page, make a note to indicate the source.”  This would be true for the same reasons advanced under Area 2 and Area 4.
7.0.2	5679	Making the reference note the first one for older monographic resources is problematic because there may in fact be a number of such citations, particularly to enumerative bibliographies, that may or may not contain detailed bibliographic description. DCRM(B) places such notes immediately prior to the summary or contents, which is more useful to users.
7.4.1	6413-6415	This example would be more appropriate under the provision for older monographic resources, as a second example following line 6428. The provision for older monographic resources covers both situations in which the publication, etc. information is taken from a source within the resource other than the t.p. and those in which the information is supplied from outside the resource.
7.5.1	6485-6488	The section on additional physical details for older monographic resources is inadequate. Number of lines per page and identification of type is primarily used for incunabula and should be required for such resources if ascertainable. In addition, there should be provision for notation of ornaments, type or method of illustration, and such things.
7.5.1.1	6489-6492	Signatures should be given for letterpress resources of the handpress period. Since a description is supposed to be of an ideal or complete copy, however, the copy used for the collation should not be specified. If there are unusual features about a particular copy, those should be described in an Item specific note.

**ISSUES BY AREA**

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
Introduction	30-31	Public libraries, school libraries, and special libraries create and use ISBD descriptions and should be recognized along with national libraries, research and university libraries.
Introduction	175	Perhaps add another sentence to this paragraph reading: "This is especially problematic for manual or non-automated catalogues where suppressing the display of individual data elements (e.g., GMD) is not an option."
<b><i>Area A</i></b>		
A.2.6.2 b)	374-375	Consider adding the following "Editorial comment" following these examples: "Editorial comment: Sequential title change, not two simultaneous regional editions of the Transportation directory."
A.2.6.3 b)	315	Consider adding the following parenthetical qualifier to the Editorial Comment: Print version (loose leaf).
A.2.6.3 d)	423	There are no examples for this Section. Every other Section includes examples. We suggest adding examples.
A.3.2.7	588-5990	Double punctuation instruction. Does ISBD really want to continue to instruct catalogers to input double punctuation in such instances? This seems to be an instruction that is struggling against the trend toward greater readability of catalog records.
A.4.2 and A43	656-789	Preferred and Prescribed Sources of Information A.4.2 and A.4.3 should be reversed. How can one talk about the order in which sources of information are to be chosen when one has not talked about which sources are eligible to be chosen for a particular area? Once the cataloger has made the choice of what sources, in the abstract, may be sources for a particular area, then the cataloger can make choices amongst different presentations of information on basis of which presentation is preferred to others.
<b><i>Area 0</i></b>		
The introduction to the Consolidated edition emphasizes that the purpose of ISBD is the specification of the elements of a bibliographical description rather than their display, and the creation of Area 0 is a firm statement of that. Nonetheless, there are two issues of display that should be faced, particularly for those who are still in manual environments. The first is the placement of Area 0 at the very beginning of the description. While this makes theoretical sense, such a placement of the information would present the information that the user is least likely to want to find first when looking for a specific item or material by or about an individual. Such information is perhaps at least as likely to be employed as part of a discovery process as part of the selection process. Computer-managed displays, including printed catalogs, can manipulate the placement of the information so that this is less of a problem for the		

Rule	Line(s)	Comment
		<p>electronic bibliographic record or equivalent. The second issue is that Area 0 takes what might be called a faceted approach to describing the form of a resource, separating content from carrier (<i>Media type</i>), and segmenting content into fundamental form of content (<i>Content form</i>) and more specific characteristic(s) of content (<i>Content qualification</i>). The resulting descriptions, especially of relatively straightforward forms, while they are intellectually satisfying, may not communicate clearly with the intended users of these descriptions or even describe their content clearly.</p> <p>For example, “Image (cartographic)” may not communicate clearly the concept “Map”. And “Music (performed) : electronic” might easily be interpreted as “Electronic music” rather than as the intended “Music stored in electronic format”. One needs to know the general categories of Content form and qualification and Media type in order to make sense of the strings, and in general the terms are more intelligible to librarian than to non-librarian users. In an online catalog or database or Internet resource, the categories can be replaced by icons that are more intelligible to users, although an icon for “gustatory” might admittedly be somewhat strange-looking.</p> <p>We recommend redefinition and/or renaming of some of the terms, here are some particularly problematic terms:</p>
<b>0.1 Content form terms</b>		
	1054 ff.	<p>[The line numbering appears to have been unsettled by the chart, and it is unclear how to cite the lines in the chart. As a result, line numbers are not given for comments on terms in the table/chart.]</p> <p>Definition of “image”. Theoretically, maps and motion pictures are both images. But they are such different kinds of images ... did the ISBD drafters consider trying to separate these into three different forms? It seems so convoluted to have “Image (cartographic)” and “Image (moving)”. Also, since Content qualification is not Mandatory, it seems that there is the possibility of the very misleading “Image” or “Image : projected” being used to describe, respectively, a “Map” and a “Film.” Why single out lithographs? Why not just say “art prints” (to include engravings, etchings, lithographs, woodcuts, etc.)? Also, the list of examples is in alphabetical order except for “motion pictures and lithographs.” Why not alphabetize the final list? In fact, that would be a good general guideline for all lists of examples – alphabetize them all.</p> <p>Definition of “music” – Some music does not seem to consist of “mechanical sounds having rhythm, melody, or harmony”, as specified here. What if the sounds don’t have “rhythm, melody or harmony”? Perhaps the term is too limiting.</p> <p>Definition of “sounds” - the examples are pretty limiting. Couldn’t “sounds” include pounding a rock or machine noise (which does not seem to reflect the “Content expressed through” sentence.</p>

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		<p>Definition of “spoken word” – The definition should be able to include the sound of a computer-synthesized voice or even a parrot talking. Where would videotapes of stories given in sign language be included?</p> <p>In general, the definitions need to be more flexible to accommodate new types of materials and new ways of storing and accessing them. Perhaps moving the definitions to the Glossary or providing expanded definitions within the glossary would be more useful.</p> <p>Content qualification: Some of the terms included here (e.g., “still” for Image and “gustatory”) seem to have been added purely for intellectual symmetry (e.g., “still” because “moving” was needed, “gustatory” because “tactile” was needed), and so perhaps can be accepted but ignored, assuming that they would seldom, if ever, be used.</p>
<b>0.2 Content qualification</b>		
	1063 ff.	“Specification of type”. Under the “notated” example, couldn’t this have other than merely “artistic purposes”, perhaps also educational or historical? Must the purpose should be included?
0.2	1070 ff.	“Sensory specification”. The terms “gustatory” and “olfactory” are not user-friendly.
0.3	1086 ff.	<p>Media type terms: “Electronic” works well in some situations, but not in others. Specifically, the use of “electronic” with the Content Form “Music” is particularly confusing. The distinction between music on a CD (e.g., “sound disc”) and music on a CD-ROM seems strained: one is “Music (performed) : audio” while the other is “Music (performed) : electronic”.</p> <p>In addition, we are concerned that users will wish to distinguish between remote access (online) and direct access electronic resources at a fairly high level in the description and this should be appropriately incorporated in Area 0.</p>
<b>Area 1</b>		
		<p>This is a very impressive job of consolidating the formats, etc. and, in general, seems to work well. The rules and examples are sometimes too generic and may not give guidance on some of the more difficult transcription/recording issues that catalogers may address in any one format.</p>
1.1.4.1.1	1320	<p>“... the title proper is selected by reference to the typography...”. But what are the parameters? Prominence, most likely, but how is that determined? More explanation is needed. (It does seem more clearly explained when brought up again in 1.1.5.4, lines 1606-1607 [and a few other places], but it is not clear these are meant to be applied in the same way.)</p>

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
1.1.5.4	1601-1602	We are not sure what is meant by “displayed text without a title”. At first this seemed like it might mean “caption”, but longer perusal indicated that it might refer to the first line(s) of text found on the kinds of material suggested. The glossary was no help (no entry for that word or phrase), but it seems as if a definition should be added there.
1.3.3.2	1840-1841	The text saying that additional information should be “supplied from the content of the resource” would seem to indicate that the cataloger could devise the phrase based on the content. Trying to glean intent from each example given, one finds that the devised content is given in the language of the resource. Therefore it seems to assume that a cataloger can devise a meaningful phrase after comprehending the content sufficiently to supply this extra information. For catalogers working in languages for which they do not have fluency (quite a common occurrence), this would be a fairly tall order. Is that really the intent here? If not, what is the intent of that phrase?
1.4.2	2081-2112	This rule identifies “entities” in two bulleted paragraphs, then provides further advice “For motion pictures...” and “For electronic resources” further down the page, each discussing its own issues related to entities. The first phrase of “For electronic resources” points to entities listed “above”, but unfortunately it follows the “For motion pictures...” paragraph, making “above” appear to refer to that text (even though it seems certain it means the two bulleted paragraphs further above). One easy way to resolve this problem without changing the text at all is to switch those two paragraphs; otherwise the text will need to be tightened for clarity.

***Issues with ISBD punctuation***

1.1.3.4.	1228-1229	<p>The reference to “prescribed punctuation” here is rather vague for those who may not be aware of the most common punctuation practice related to the “linking word” between both titles. The phrasing of the rule brushes up to it by saying, “There is no prescribed punctuation before or after the linking word.” So just what might that “prescribed punctuation” have been? Well, apparently for those in the know, the practice for “it” is given: “The use of this punctuation is at the discretion of the cataloging agency”. (And of course it shows up in a few of the examples below.)</p> <p>We have two concerns. First, “prescribed punctuation;” one of the most important things that ISBD has done for cataloging is to define parts of a record through means of cataloger-supplied ISBD punctuation. This premise is beautifully spelled out throughout A3. One more step might be taken, however, and that would be to include a stipulation for the common practice of separating the first title from the alternative title by placing a comma at each side of the linking word. Rare materials catalogers use this punctuation when warranted. The result is that records – especially those in less familiar languages – become much clearer with the two titles set off</p>
----------	-----------	---

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		<p>in this way. Please reconsider and include a stipulation for placing a comma at each side of the linking word.</p> <p>The second consideration is that the sentence appears to be the first time, but certainly not the last, that ISBD allows for punctuation (as well as capitalization and a few other things) to be applied (or not) “at the discretion of the cataloguing agency”. Showing examples of such discretionary practice plays havoc with the readability (viability) of the ISBD punctuation (as well as capitalization and the spelling-out standards). Why are the ISBD stipulations allowing for “discretion”?</p>
1.1.5.2	1542-1544	<p>The examples under the second paragraph for this topic, “Resources without a collective title”, introduce a few punctuation issues worth noting. The first is found in examples 2-4: the separation by comma of the “linking word” before the second title (following the standard punctuation of a semi-colon between both titles). Even though the second title begins with a capital letter every time, this stronger indication of the linking word seems like a good idea and ought to be considered as a new element of ISBD punctuation. (Please note that this practice is mysteriously not followed with the first example under “For older monographic resources” on the next page [line 1561]</p> <p>The final 3 examples in that paragraph introduce a difficult situation. These all happen to be cases where there are 2 titles by 2 authors, each with the first title having an edition statement. Apparently determined not to have a period until the bitter end of the first title, the cataloger responsible for the examples ends the Statement of Responsibility of the first title with a comma, then starts the edition statement for the same title with a capital letter anyway (despite the punctuation that would normally be used in a full catalog record between those two areas). This is jarring. The desire not to want to use a period beforehand is understandable, but the result would be clearer if the cataloger were simply to lower-case the first word of the edition statement.</p>
<b><i>Outcomes from “at the discretion of the cataloging agency”</i></b>		
1.1.5.1	1481	<p>The example shows an older method for spelling two Latin words (both using <i>ę</i>). Today, the words would be spelled “<i>quae</i>” and “<i>aeneidos</i>”. Without a standard provision for spelling those out (i.e., <i>qu[a]e</i>, where in many [most?] systems the brackets are ignored in searching), this title might be lost to a searcher who knows Latin and uses the modern spellings to search for titles in Latin.</p>
	1497-1498	<p>It is unclear why the asterisk was omitted in the transcription. This seems to conflict with the stipulation in 1.4.5.1, line 2300 and the example in line 2306.</p>

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
<b><i>Editorial comments</i></b>		
1.1.3.3	1217	In general, more “Editorial comments” describing how a resource presented itself would have been more helpful under several examples. Just as one example:  Refers to the fact that a title proper can consist of (among other things) a logo. It would have been nice to see which of those examples (if any) were there as a result of “translating” a logo. If there are no examples of a logo represented in the examples, it would be helpful to find one and include it and the comment about it.
<b><i>Area 2</i></b>		
2.1.1	2807-2809	“A statement that includes the word “edition” or its equivalent is not considered an edition statement when it represents printing information, as is typical in the publication patterns of certain countries.” We recommend changing the last clause to “as is typical in publications of certain countries or in certain languages.” The problem is not that Spanish publishers mean something different from Mexican publishers by “edición,” but that the word has different meanings. On the other hand, “edición” in a United States publication might well mean the same thing as the English word “edition.”
	2926	There should be an example of an edition taken from other than a prescribed source, such as a preface.
2.1.3	2934-2938	Including a devised edition statement in Area 2 is guaranteed to create duplicate bibliographic records and ghost entries in bibliographies. DCRM(B) 2B5.1 says not to supply an edition statement but include it in a note. This might create problems with certain bibliographic utilities (e.g. OCLC), but the alternative is bibliographic confusion. Indication of a different edition that is not present in the resource itself should be recorded in a note.
2.4.3	3066	This instruction seems to conflict with 2.1.1 (line 2807-2809). Why would “22. unveränderte Aufl.” be treated differently from “2., unveränderter Neudruck der 3., völlig neubearbeiteten Aufl.?”
<b><i>Area 3</i></b>		
3.1		The title of this area is unclear, and the Committee suggests the longer but more accurate, “Material- or type-of- resource-specific area.”  ISBD Area 3.1 has not changed greatly from the 2007 version. The two substantive changes are:  1. The area is now Mandatory  2. Confusing and contradictory instructions for recording decimal degrees have been deleted.  Both these changes are desirable and are to be commended.  However, there are two stipulations for which we recommend changes: 3.1.1.5 and 3.1.1.7.

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
3.1.1.5	3165-3174	<p>3.1.1.5 doesn't specify that there be any indication that a scale that is derived (rather than computed) is approximate, but the examples all have an indication of approximation (e.g., "ca."; "env."). Recommend that 3.1.1.5 contain an explicit statement that a scale statement that is derived rather than computed should include an indication that it is approximate.</p> <p><u>Stipulation:</u> 3.1.1.5 When there is no numeric or verbal statement of scale, the representative fraction is derived from a bar scale, a graticule (i.e. from 1° of latitude that on average is 111 kilometres) or grid, or by comparison with a map of known scale, and is enclosed in square brackets with an explicit indication that it is an approximation.</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> <li>. – [1:1 800 000 env.] <i>Editorial comment:</i> Representative fraction computed from bar scale.</li> <li>. – Scale [ca 1:277 740] <i>Editorial comment:</i> Representative fraction computed from graticule.</li> <li>. – 縮尺 [約 1:432 000]</li> <li>. – 축척 [약 1:100 000]</li> </ul>
3.1.1.7	3177-3180	<p>3.1.1.7 makes a distinction between "Scale indeterminable" and "Scale not given." This does not seem to be a useful distinction for users of maps, in addition to being a distinction that may be difficult for a cataloger to make. The scale of any map of a real place should be determinable given the appropriate tools (e.g., other maps of the same place that do contain a statement of scale). In addition, 3.1.1.7 seems to be limiting the source of scale information to the resource itself, although this information could reasonably be found on a container or in accompanying material (which are listed as possible sources of information for area 3.1. (line 3136)).</p> <p>Recommend modifying 3.1.1.7 to eliminate the distinction between "Scale indeterminable" and "Scale not given", using just "Scale not given" or its equivalent in another language whenever the scale is not given.</p> <p>Recommend also modifying 3.1.1.7 to specify that it applies whenever the scale of the resource is not given on the resource, its container, or accompanying material.</p> <p>Suggested rewording:</p> <p><u>Stipulation:</u> 3.1.1.7 When the scale of the resource is not given on the resource, its container, or accompanying material, the phrase "Scale not given" or its equivalent in another language is substituted for a statement of scale.</p>

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		<p>Additional comment: There appears to be something of a contradiction between 3.1.1.5 and 3.1.1.7. In 3.1.1.5 is the suggestion that scale may be derived “by comparison with a map of known scale” ; but 3.1.1.7 states that when the scale is not given on the resource, then one of the two statements listed is substituted for the statement of scale. One possible way to resolve the conflict would be to modify 3.1.1.7 further, by inserting the following phrase “and the cataloging agency does not choose to derive the scale by comparison with a map of known scale” as shown below:</p> <p style="padding-left: 40px;"><u>Stipulation:</u> 3.1.1.7 When the scale of the resource is not given on the resource, its container, or accompanying material, and the cataloging agency does not choose to derive the scale by comparison with a map of known scale, the phrase “Scale not given” or its equivalent in another language is substituted for a statement of scale.</p>
<b>3.3 Examples</b>		
		A.6.4 says that “The abbreviations used throughout in the examples ... are illustrative and not prescriptive.” It would still be helpful if some of the examples were given in unabbreviated form, so that it would be clear that a cataloger may spell out words. RDA 1.8 provides a variety of options and RDA 2.6.1.4 says to follow 1.8 for numerals and to “Transcribe other words, characters, or groups of words or characters as they appear on the source of information.”
3.3.1.1	3342-3343	It would be helpful if the transcription of spelled-out numbers were allowed as an option.
3.3.7-3.3.8	3416-3449	The abbreviations recommended for use in captions for numbering differ from those prescribed in other English-language cataloguing rules and standards. For example, “n.s.” vs. “new ser.”, “vol.” vs. “v.”. The specification of particular abbreviations may paradoxically act as a barrier to international consistency. Furthermore, RDA adopts the position that the use of abbreviations can be a barrier to user understanding, and limits the abbreviation of terms in bibliographic descriptions. We suggest that it will be difficult to harmonize the use of abbreviations across standards, and suggest that there be an option not to abbreviate terms in the numbering area or the numbering within a series element.
<b>Area 4</b>		
4.1.14	3764-3771	There is much controversy in the American cataloging community over the continued use of [S.l.], and an option allowing the use of [Place of publication unknown] would be helpful in maintaining compliance with ISBD. The basic problem is that there is disagreement over whether “sine loco” and “sine nomine” continue to be intelligible to modern users. The CJK examples used say essentially the same thing as [Place of publication unknown]. If the option is allowed in this stipulation, more examples from French, German, Finnish, etc. would be helpful. The Russian abbreviation

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		(Б. м. for Без места) should be generally known to Russian readers so it would appear that an abbreviation would be acceptable here.
4.2.12	4093-4101	As noted above, there is controversy in the American cataloging community over the continued use of s.n., and an option allowing the use of “Publisher unknown” would be helpful in maintaining compliance with ISBD. The basic problem is that there is disagreement over whether “sine nomine” is intelligible to modern users. The CJK examples say essentially the same thing. If the option is allowed, then more examples from other languages from other languages. The Russian abbreviation (б.и. for без имени) should be generally known to Russian readers so it would appear that an abbreviation would be acceptable here.
<b><i>Area 5</i></b>		
	4696	ADD following line 4696, these examples: <ul style="list-style-type: none"> <li>. – 1 online resource</li> <li>. – 1 streaming video file</li> <li>. – 1 streaming audio file</li> <li>. – 2 CD-ROMs</li> </ul>
	4783	Following line 4783: add another example: “approximately 250 leaves”
<b><i>Area 6</i></b>		
<b><i>Introductory note</i></b>		<p>These paragraphs seem out of order. The Committee suggests putting existing paragraphs in the following order: 1,2,5,4,3, so that line 5734 follows line 5365 and is in turn followed by lines 5370-73.</p> <p>We observe that there are no instructions in the Introductory note (lines 5358-5374) advising catalogers to refer to instructions under 7.6.1 (at line 6553) for the situation when a continuing resource or multipart monographic resource is published within two or more series or subseries successively. At a minimum, we feel that it would be advisable to add such an instruction to the Introductory note for Area 6. If added, it pairs conceptually with the last paragraph/sentence of the Introductory note, which itself could be moved earlier in the sequence of paragraphs there – to follow the current second paragraph.</p>
<b><i>Area 7</i></b>		
	5636-5637	Introductory Note. Although ISBD (and ISSN) have always instructed us to cite relationships to continuing resources in the form of the ISSN and key title, that doesn’t always seem practical in terms of the decisions that have been made in relation to catalogs, whether online or card format. In OPACs, hot-linking to related resources is generally (or always?) done on the title proper, so having a link in the form of the key title may not get the user to that other resource if

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		<p>a particular catalog has not been programmed to give added entries to key titles – especially if the key title is not in the same form as that of the catalog title, which is a common occurrence.</p> <p>In card catalogs, making notes on relationships in the form of key title is only helpful if the key title for a related resource has been given an added entry in that catalog.</p> <p>Also, if the title is in a script for which there is a transliteration of the key title (which is given in the ISO's transliteration scheme), that transliteration may be different from that of the title proper. Users of catalogs in the US and other countries may only be familiar with the transliteration scheme used in their particular country.</p>
7.1.2.1	5870	<p>Thesis (M.A.) does not contain enough information. A separate stipulation for a thesis or dissertation note would be better. The information should contain the word Thesis (degree)—institution and date of thesis. Alternatively, the note should include the department or program in which the degree was earned.</p>
7.1.2.2	5897-5910	<p>The current draft ignores the issue of languages that are written in more than one script. This is information that affects the ability of users to discover and select a resource they need. We recommend the following changes to this stipulation:</p> <p><b>7.1.2.2 Notes on language and Script</b></p> <p>A note on language is necessary only if the linguistic content is significant and the language or script of the content cannot be inferred from other elements of the description.</p> <p>[Existing examples]</p> <p>[Additions below to follow the existing examples]</p> <p>In cases where the language is not primarily written in one script it may be desirable to name both language and script.</p> <ul style="list-style-type: none"> <li>. – In Mongolian (Cyrillic)</li> <li>. – In Mongolian (Mongolian script)</li> <li>. – Монголоор (Кирилл)</li> <li>. – Монголоор (Монгол бичиг)</li> <li>. – In Syriac (Nestorian)</li> <li>. – In Syriac (Estrangelo)</li> <li>. – In Syriac (Jacobite)</li> <li>. – In Azerbaijani (roman)</li> <li>. – In Azerbaijani (Cyrillic)</li> <li>. – In Azerbaijani (Arabic script)</li> <li>. – In Sanskrit (Devanagari and roman) and English</li> </ul>

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
7.1.4.2	6013-6014	The form of the reference here is inconsistent with that given 7.0.2, line 5683. Or has a conscious distinction been made between abbreviations for standard resources in 7.0.2 and the pattern used in notes, which involves titles and statement of responsibility with location? If such is the case, the distinction should be spelled out.
7.2.4.6	6168	When two or more resources are issued together, the note describing that fact should be mandatory and not optional. Otherwise, the user may not be able to match the description with the item in hand.
7.2.4.6	6178-6179	The example is unclear. Please substitute an example with words as the titles not two abbreviations, one of which has a standard meaning in the English-speaking world (N.T. generally means New Testament).
7.3.1.2	6314	There is a problem when the same abbreviation may have multiple meanings in different disciplines. "MSS" is a case in point. If abbreviations are to be used, it would be useful to have a source untangling them.
7.6.1	6553	The note should be mandatory in order to enable discovery and identification of the resource.
7.8.1	6666-6678	These do not relate to terms of availability but to edition. There is nothing like them in 8.3, lines 6952-6960.
<i>Area 8</i>		
8.1.5	6934-6936	Add the sentence at the end of the stipulation: If a fingerprint is given, it is accompanied by an identification of the formula used.

## Appendices

### Appendix A

#### Content

The most salient development in Appendix A is that the previous exception for Cartographic Material has been converted to be the first paragraph following the examples and now applies to all materials.

This change, however, reveals that the multilevel description seems limited to "multipart monographs" or at least that is what the last four paragraphs suggest. If it is intended that the type of description heretofore often found in European national bibliographies is comprehended by Multilevel Description, then there should be an example of a series and the top level, and the individual monographic parts at the second level. It appears this is covered by "description of component parts" at inset d.

A solution to make clearer that multipart monographs is a or the common case would be to have two sections in Appendix A

A. General (first four paragraphs)

B. Examples for Multipart monographs, from ca. 6990 onwards

Rule	Line(s)	Comment
		<p>This Appendix could be enriched with examples from other formats; for instance multiple levels of cartographic publications (a very prevalent aspect of this format) and sound recordings (such as multi-disc anthologies, with distinct titles for each disc), to name just two formats. Finally, an example of a multi-level description in which the first level is a serial and the last a monograph would be very helpful to catalogers.</p>
	ca. 6990	<p>Editorial comment: Starting ca. line 6990, the numbered offsets are changed to letters and the phrase “the description of” is removed but only from a) line 6990 and b), line 6999; for consistency it should also be removed from c), line 7007.</p>
<i>Appendix C</i>		
Comment		<p>We are unclear about the function of this bibliography. For example, in the cataloging communities, it is likely that <i>Cartographic Materials : a manual of interpretation for AACR2, 2002 revision</i>, published by an IFLA member is better known than the United States Defense Mapping Agency (and why the U.S.? why not the British, Australian, etc. mapping agency?). Moreover, <i>Cartographic Materials</i> includes citations to definition sources, one of which is USDMA. Why is Delsey’s <i>The logical structure of the Anglo-American cataloguing rules</i> included except that it is mentioned in the introduction with reference to GMDs.</p> <p>In addition to the <i>Descriptive Cataloging of Rare Materials (Books)</i>, there is also <i>Descriptive Cataloging of Rare Materials (Serials)</i>, published Washington, D.C. : Cataloging Distribution Service, Library of Congress, 2008. Now that <i>RDA: Resource Description &amp; Access</i> has been published (June 2010), it should be added, but AACR2 should be kept in the list as well because it is the source of many existing translations.</p>
<i>Appendix D</i>		
		<p>ISBD-Consolidated (2010 edition) limits itself to some of the most commonly-used English language abbreviations, and then points to ISO 832 and ISO 8000-3 for expanded lists and guidelines.</p> <p>Of the English language abbreviations included in Appendix D, two conflict with current widely-used AACR2 abbreviations. ISBD-Consolidated (2010) recommends “cop.” for copyright while AACR2 prescribes “c” in area 4; and ISBD-C (2010) recommends “vol.” for volume or volumes while AACR2 recommends “Vol.” <b>only</b> if at the beginning of a field or area. Elsewhere, AACR2 recommends using “v.” for volume or volumes, as does ANSI/NISO standard Z39.71 (Holdings Statements for Bibliographic Items). Given the international use of AACR2 by many libraries, we recommend that these abbreviations be provided as options.</p>

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
<b>Appendix E</b>		Many of these suggestions are changes in wording rather than substance, but it seemed better to keep all of the glossary comments together for the ease of those concerned with the comments.
	7168-7172	<b>broadsheet, broadside.</b> The Committee requests that <b>broadside</b> be chosen as the preferred term instead of <b>broadsheet</b> . “Broadside” seems to be the preferred term in the online <i>Merriam Webster</i> and Carter’s <i>ABC for Book Collectors</i> . While “broadside” has a meaning as both format and format, “broadsheet” has an additional meaning of a newspaper format that could be confusing.
	7168-7170	<b>broadsheet.</b> Why are there no <i>see</i> references from the items in the “e.g.” list?
	7193-94	<b>chief source of information.</b> In Anglo-American cataloging terminology, the chief source of information is <i>the</i> preferred source of information, that is, the source that is to be chosen before any other source, not “the order in which the source or sources are selected for the description from among the various possibilities for sources” as the definition in lines 7621-23 states.
	7235-7237	<b>content standard,</b> final sentence. Consider revising to read: “The word ‘content’ refers to the content of the bibliographic or descriptive records, not the content of the resources being described” Also consider adding an additional final sentence: “Examples of content standards include ISBD-Consolidated, AACR2, etc.”
	7277-7279	<b>direct access.</b> Consider revising to read: “a method of accessing the content of an electronic resource by use of a physical carrier, such as a disc, cassette or cartridge, designed to be inserted into a peripheral playback device attached to a computer”
	7298-7300	<b>electronic resource,</b> first sentence. Consider revising to read: “a resource consisting of materials that are computer-controlled, including materials that require the use of a peripheral playback device (e.g. a CD-ROM player) attached to a computer”
	7364-7365	<b>format.</b> Consider revising to read: “in general, refers to the specific physical medium or carrier of a resource (See also Specific Material Designation (SMD))” Add at the end of the definition: “The former title of an integrating resource is a title proper found on an earlier iteration of the resource.” If there is an entry for <b>former title</b> , there should also be one for <b>succeeding title</b> or <b>later title</b> .
	7422-7431	<b>inset,</b> at line 7422- . Consider including numbering of these two separate definitions as at “Generic Term.” That is:  (1) <older monographic resources> any leaf or gathering printed with letterpress in a separate process, not forming an integral

Rule	Line(s)	Comment
		<p>part of the regular gatherings of leaves, but issued with the resource. In bookbinding, a section of two or more leaves placed within another section in such a way that the back folds of both are sewn in the same pass of the thread. The inset section can wrap around the outside of the main section (“outsert”) or be placed in its center or at some intermediate location within it. Insetting is used to include plates without having to go through the time-consuming process of tipping them in. [ODLIS]</p> <p>(2) Also refers to a small diagram, map, or illustration printed within the area of a larger map or illustration, usually enclosed in a border of ruled lines. [ODLIS]</p>
7460		<b>International Standard Text Code (ISTC).</b> Should there be an entry for the <b>ISTC (ISO 21047)</b> , following line 7460?
7507-7509		<b>merger.</b> Consider using the more commonly-recognized term <b>title merger</b> instead. If desired, there could be a <i>see</i> reference here from <b>merger</b> to <b>title merger</b> .
7522		<b>microform.</b> The definition proposed for microform would seem to include miniature books, miniature art works, microscope slides, photographic slides. Even things that you need a magnifying lens to read. AACR2 is a bit better: A generic term for any medium, transparent or opaque, bearing microimages. RDA is even better: Media used to store reduced-size images, not readable to the human eye, designed for use with a device such as a microfilm or microfiche reader. Includes both transparent and opaque micrographic media.
7561		<b>numbering.</b> Consider revising to read: “the identification of each of the successive issues or parts of a resource. The description can include a numeral, a letter, any other character, or the combination of these, with or without an accompanying caption (volume, number, etc.), and/or a chronological designation”
7588-7589		The Glossary needs to be consistent in its use of <i>see also</i> references. Sometimes the references appear in parentheses, sometimes they don’t. Here the <i>see also</i> reference appears as a secondary clause of the definition separated with a semicolon. <i>See also</i> references should always appear within parentheses with the first word capitalized as at the Glossary entries for <b>colophon</b> , <b>issue</b> , <b>physical carrier</b> , etc.
7621-7623		<b>preferred source of information.</b> The current Glossary definition here does not match the term. The definition needs to be revised. Perhaps something like: “the list in order of preference of the prescribed sources in which a source of information is selected from among the available sources in order to create the bibliographic description for a resource”
7693		<b>remote access.</b> Consider revising to read: “a method of accessing the content of an electronic resource stored on a server and accessed through a computer network.”

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
	7714-7718	<b>resource.</b> Consider revising to read: “an entity, tangible or intangible, that comprises intellectual and/or artistic content and is conceived, produced and/or issued as a unit, forming the basis of a single bibliographic description. Examples include text, music, still and moving images, graphics, maps, sound recordings and video recordings, electronic data or programs, including those resources issued serially (See also whole resource)”
	7764-7769	<b>sheet.</b> There is no reason to exclude <b>broadsheet</b> , since this definition also includes sheets that are printed on one side. Also, in the special description for older monographic resources, the practice of printing on sheets that were later folded to make gatherings continued well into the 20th century, so this is a false exception. It is unclear why there are two definitions here.
	7791-7793	<b>specific material designation (SMD).</b> Consider revising to read: “a term indicating the specific class of material (usually the physical medium or carrier) to which a resource belongs”
	7794-7795	<b>split.</b> Consider using the term <b>title split</b> instead. If desired, there could be a <i>see</i> reference here from <b>split</b> to <b>title split</b> . Also consider revising the definition to read: “The separation of a continuing resource into two or more new and distinct continuing resources”
	7811-7812	<b>study print.</b> Adding reciprocal <i>see also</i> references from the two Glossary entries <b>flash card</b> and <b>study print</b> would be helpful to users.
	7889-7895	<b>videodisc</b> and <b>videorecording.</b> In the final clause of each, the more general or broad phrase used at the Glossary entries for <b>cartridge</b> and <b>cassette</b> should be used in preference to these specific phrases citing televisions and computers. Certainly there are other additional video playback devices beyond televisions and computers.
	7889-7892	<b>videodisc.</b> Consider revising to read: “a laser- or stylus-readable random-access circular disc that contains both audio and video signals recorded in an analog form (e.g. laserdisc format) or a digital form (e.g. DVD format) designed to be inserted into a display or playback device.”
	7893-7895	<b>videorecording.</b> Consider revising to read: “a recording of visual images, usually in motion and with sound accompaniment, designed to be inserted into a display or playback device.”
	7899	<b>visual projection.</b> Typo, line 7899, the introductory clause should read: “a two-dimensional image (or set of images) produced in its original form by such techniques as drawing, painting or photography, and designed for use with a projector or a magnification device such as a viewer or microscope”.

**ERRORS**

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
p. iii		Liaisons with other groups, Entry for Gordon Dunsire – Representation should be “Semantic Web communities,” not “Sematic Web communities.”
Introduction	41, 66	These are instances (there may be others) where the full stop ending a sentence follows the footnote number rather than precede it, contrary to the correct practice in lines 43, 51, 76, etc.
Introduction	162-166	This sentence is a run-on. A suggestion revision is: “However, given the changing nature of resources and recent technological developments that have impacted bibliographic access, the ISBD Review Group has decided to focus maintenance upon the consolidated edition of the ISBD which has superseded the individual ISBDs. In maintaining ISBD-Consolidated, the ISBD Review Group will continue to take into account changes to national and multinational cataloguing codes.”
A.4.1	642 & 643	“Single-part monographic resources:” and “Multipart monographic resources:” both need to be bold face.
A.6.3,	847	There is a parenthetical reference to Section 4.1.16 – There is no Section 4.1.16 in the current draft.
1.1	1111 ff.	The entire section is incorrectly paginated as 1.2 ...
1.1.4.3	1375	The roman numeral IV in the TOC lacks its period.
1.1.4.4	1394 & 1395	The bolding is inconsistent with examples above with respect to the brackets, as well as bolding in the actual script (also note that that line 1394 seems to be indented one space further in than the rest of the examples).
1.1.5.1	1481	Possible omission of period after first initial.
1.1.6	1625	Last reference should be to 7.1.1.4
1.3.1	1792	Reference should be to 7.1.1.2
1.3.3.1	1838	Reference should be 7.1.1.3
1.4.5.9	2477	the ellipsis lacks the space at the end.
1.4.5.9	2479	there appears to be an extra space after the period between “Cates” and “Statements”.
1.4.5.10.1	2522	there is a gap at the end of the sentence in which the following word (Organization) should be able to fit.
Area 4.2	3797ff	the page numbering is erroneous, using 4.3-1, 4.1-2, 4.3-3, 4.1-4, and so forth.

**GENERAL STYLE**

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		The consistent use of the passive (is given, may be given) is poor style and open to confusion because it is not always clear when a stipulation is mandatory. AACR2 adopted the imperative (Give, Record) and most subsequent English language rules have followed.
		We are unclear why the draft uses the term “stipulations,” which seems unnecessarily pedantic. Why could “instructions” not be used instead?
3.3.5	3401	We suggest that optional decisions should be more obvious in the text, here and elsewhere, e.g., “ <i>Option:</i> The parallel designations may also be given.”

**SUGGESTIONS FOR CHANGES IN WORDING***Table of Contents*

		The syntax of the label for Area 3 is awkward and unclear and should be revised. [This would also entail revising the Area 3 title in line 3090]
		Perhaps change from: “3 Material or type of resource specific area” to: “3 Material or specific type of resource area”
Introduction	4-6	Perhaps change from: The main goal of the ISBD is, and has been since the beginning, to provide consistency when sharing bibliographic information ... to: From its beginning, the main goal of the ISBD has been to provide consistency when sharing bibliographic information.
Introduction	11-16	Perhaps revise to read: A new Statement of International Cataloguing Principles (SICP) was published by IFLA in 2009. In these principles, which replace and broaden the 1961 Paris Principles, the fifth section is devoted to bibliographic description where it is stated that “Descriptive data should be based on an internationally agreed standard.” A footnote identifies the ISBD as the standard for the library community, as the SICP is intended not only for libraries but also for archives, museums, and other communities.
Introduction	17-21	Perhaps revise to read: “Although the development of this standard was originally motivated by the automation of bibliographic control as well as by the economic necessity of sharing cataloguing, the ISBD continues to be useful for and applicable to bibliographic descriptions of all kinds of resources in any type of catalogue, whether manual or machine-based. Those agencies using national and multinational cataloguing codes could apply this internationally approved standard conveniently in their catalogues.”

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		<i>Note:</i> The phrase “manual or machine-based” is used in Section A.10 at line 990. It seems less pejorative than the phrase “less technologically advanced.”
Introduction	36-38	Perhaps revise to read: “The organization of provisions in the present text is to give first the general stipulations that apply to all types of resources, then the specific stipulations necessary to describe a specific type of resource or that represent exceptions to a general rule.”
Introduction	39-43	Perhaps revise to read: “In the terminology of Functional Requirements for Bibliographic Records (FRBR), the ISBD is applied to describe manifestations, by means of description of the item in hand as an exemplar of the entire manifestation. In this way, the ISBD applies the Statement of International Cataloguing Principles, which establishes that “A bibliographic description typically should be based on the item as representative of the manifestation”.
<b><i>Introduction, Revision 2000-2006</i></b>		
	126-128	Perhaps revise to read: “In this general revision project, ISBD(S) was revised to ISBD(CR) for serials and other continuing resources, and was published in 2002 following meetings to harmonize the ISBD(S) with the ISSN guidelines and with revisions to the Serials/ Continuing Resources chapter of the Anglo-American Cataloguing Rules, 2nd edition.”
<b><i>Introduction, Preliminary Consolidated Edition</i></b>		
	137	Perhaps revise to read: “The ISBD Review Group was trying to address some of the challenges encountered by cataloguers today.”
<b><i>Introduction, Consolidated Edition, 2010</i></b>		
	169-172	Perhaps revise to read: “This study group was aware of concerns raised by the Working Group on General Material Designations at the first IFLA Meeting of Experts on an International Cataloguing Code (IME ICC) in 2003 in Frankfurt. As Tom Delsey had noted in a 1998 analysis of the logical structure of Part I of the Anglo-American Cataloguing Rules ...” [rest of sentence as written]
<b><i>Introduction, Consolidated Edition, 2010</i></b>		
	183	Perhaps revise the opening phrase to read: “Following further revisions and a worldwide review period, a new Area 0 ...” [rest of sentence as written.]
A.1.3	248-249	Perhaps revise to read: “It is recommended that this practice be followed also by all libraries that share and exchange bibliographic data with others.”
A.2.6.2 a)	365-367	Perhaps revise to read: “the title proper is a generic term and the issuing body changes its name, except as indicated below; or the serial is issued by a different body. (See A.2.7.1(e) for minor

<i>Rule</i>	<i>Line(s)</i>	<i>Comment</i>
		changes in a corporate body's name that do not require a new description.)”
A.4.2.5	752-764	Paragraph 760. The sequence of Mode of Issuance sections herein is usually: Single-part monographic resources; Multipart monographic resources; and, Continuing Resources. This section should follow that logical sequence as well but for some reason it doesn't. We suggest re-sequencing the list for consistency.
3.3,	3306-3309	Consider revising to read: “If the first and/or last issue or part is not available, any information about the first and/or last issue or part may be given in area 7 (see 7.3.3.2). Area 3 is omitted if both the first and last issues or parts are not available. When the description of a serial is not based on the first and/or last issue or part, information about the issue or issues or part or parts described is given in area 7 (see 7.9).”