

TO: Paul Weiss, ALA Representative to NISO

FROM: Kristin Lindlan, Chair, ALCTS/CCS/CC:DA

RE: Comments on Committee Draft ISO/CD 2108

CC:DA recommends that Committee Draft ISO/CD 2108 not be approved as is. We do not oppose the intent of the draft standard, but find that numerous problems with definitions and rules for application make the draft unworkable. We see two big issues: (1) how the ISBN proposal extends the number and thereby increases the numbering capacity, and (2) how ISBN defines and applies "edition." The first issue may be just clarifying the use of prefixes and range of possible numbers (point 3.1) and is clearly the easier one to address. The second issue is not new, though it does appear to be problematic, especially in the light of the FRBRization of AACR and other cataloging rules. Explaining what is meant by "edition" etc. is more difficult, but it seems critical that the ISBN standard have definitions that can be acted on coherently. It may be that only some tinkering with language is needed to clarify what is meant and we hope that such clarification can be achieved.

In the following section, we note the definitions and application rules that we find problematic.

Specific Comments

3 Terms and definitions

3.1 EAN.UCC prefix

It is not clear what is gained by adding the EAN.UCC prefix to the number. What purpose the prefix serves needs to be more clearly explained here and in the construction section (4). The value given for the prefix, 978, seems at first glance to be the only EAN.UCC prefix value available, but in Annex D, another value, 979, is mentioned. None of this is explained. It seems that having a 13 digit number instead of a 10 digit number would be done to achieve the first stated goal of the revision: increase the numbering capacity of the ISBN system. It will not support this goal if the first 3 digits of the 13 digit number are always the same. We're sure they don't mean this, but it isn't clear from the document itself. So the purpose is unclear, and the range of possible numbers is unclear, too.

3.3 Continuing resource and 3.5 Integrating resource

The ISBN draft need not use "resource" at all since it is always concerned with publications. These terms, "continuing resource" and "integrating resource" are needed in AACR and ISBD because those standards cover published and unpublished materials. Thus, they need a general term. For "continuing resource," and "integrating resource,"

the term “continuing publication” and “integrating publication” should be used. The ISBN vocabulary in these cases would then more closely parallel “monographic publication.”

The information in the “note” area should go into definitions.

Given the narrower scope of the ISBN document, they may want to look to definitions in the ISBDs (and AACR) for some suggestions, but not follow them exactly.

3.4 Edition

This is the AACR2 definition of “edition” for electronic resources. While it is good that the ISBN revision effort has included looking at the definitions in the ISBDs and AACR, those definitions should not be lifted into a different context. We think it is not a workable definition.

The “note” should be included in the definition as a see or see also reference.

3.5 Integrating resource (see 3.3 above)

3.6 ISBN

The definition of the ISBN should be substantive and not just a formal or technical statement that it is allocated in accordance with a specification. This definition should explain what an ISBN is. Clearly they should look to the ISBDs for guidance on a meaningful definition.

3.7 Monographic publication

Here the ISBD(M) definition may be best: “A publication that is complete in one part, or intended to be completed within a finite number of parts.” To include the concept of “product forms,” the phrase about product form could be added. Something like “A monographic publication may be distributed in any number of product forms.”

3.9 Product form

They have not defined it. This definition just raises questions that are troublesome as one applies it.

Basically, all of the definitions that we know much about are problems.

4 Construction of an ISBN

4.2 EAN.UCC prefix

The EAN.UCC prefix is not clearly explained in the definition and its construction and purpose are not explained here.

5 Issuance of an ISBN

Different product forms . . .

It is unclear what a product form is as the definition in section 3 is unclear. Neither this section nor the 3.9 definition is helpful. Will only the abstract product form listed--audio book, video, online, etc.--be given an ISBN or will each format within such general categories be given an ISBN? One can't tell, and thus one can't apply the rule.

A new ISBN shall be assigned . . .

These three sentences are poorly written. In the first, what does "significant change" mean? Does it pertain to the content only or also to the form? In the following sentences, certain assumptions seem to be in play. Does "unchanged in edition" imply the intellectual or artistic content? We think so, since "product form" may imply the carrier. But this is unclear from the text. The last sentence says that a change in price is not a significant change. Are all other changes significant? There is no clear guidance to applying or even understanding the rule.

6 Location and display

6.1 Rather than use "item," use publication instead.

6.3 Electronic publications and other non-print product forms

6.3.1 and 6.3.3 overlap. These should be combined into one or, if direct access e-things and remote access e-things need different treatments, the distinctions must be made clear.

Annex A: Principles for the assignment and use of ISBN

A.1.2

This is a mess. It relates back to problems with the definitions in section 3 for edition and format and section 5 for format and assigning a new ISBN. The text could benefit from some consideration of the FRBR bibliographic entities: work, expression, manifestation, item. The authors may not want to use those terms, but they could benefit from thinking about them. That they would add a sentence about different language versions here shows the definition they have of editions is pretty much useless.

A.1.5

This principle depends on the word "edition" and that has been poorly defined. Also, what does "minor" mean?

A.1.6

The terms "impression" and "reprint" are not defined in this document.

A.1.10

It should be "assigned" instead of "issued"

A.2 first paragraph, next to last line:

It should read: "The title page verso . . . " not "The title verso . . ."

A.3

It's not clear what the text means, "When a publication is issued both individually and as part of a series it shall be regarded as two separate editions, each of which shall be assigned an ISBN." Does it mean that an ISBN shall be assigned to the series as a whole and another to the individual volume within the series? Or is it that a particular monographic publication is issued as part of a series at one point, and at another time is perhaps issued not as part of that same series? Again, this points out the confusion over what "edition" means.

A.7.1

It should be "assignment" instead of "issuance"

Overall, the Annex A is repetitive, disjointed and generally confusing.

Annex B Administration of the ISBN system

B.2.8

This should be "assignments" instead of "applications"

Annex E Metadata for the registration of assigned ISBN

E.2.2 Product form

The problem is still that up to now we have no idea what this means. So it would be difficult to code an indication of product form. Again the difficulty is do they mean a general form—audio book, or a specific form—cassette, tape (what size?), DVD, CD-ROM, MP3, .au, .wav, etc? The granularity is vague. That is unworkable.

"Title" Does "enumeration" refers to series numbering?

"Imprint" uses "imprint" in the definition. Do away with "imprint" and use "publication, etc." or "publication, distribution, etc."

"Publisher" needs to make it clear that "The legal person who ..." is often a corporate body and not a person.

A few things about grammar:

Almost every "which" should be "that" instead.

A.4, 2nd line "may also assign its own ISBN ..."

A.7.2 2nd line “it will qualify for an ISBN ...”

E.2.2 Publication date

Need a space between “The” and “date”

F.1, 2nd paragraph, last line

Delete the comma after “ISBN”

F.2 example

It looks as if there is a space between the “a” and “l” in “algorithm.”