The RBMS Bibliographic Standards Committee (BSC) objects to several assertions and recommendations contained in the PCC Relationship Designator Guidelines Task Group Report.

Specific areas of the report are addressed below, but we would like to preface our comments by stating that the BSC and its Controlled Vocabulary Subcommittee are committed to harmonizing our terminology with that of RDA whenever possible, within the necessary constraints of ANSI/NISO Z39.19 *Guidelines for the Construction, Format, and Management of Monolingual Controlled Vocabularies* and excepting rarematerials reasons for departure.

On the topic of Z39.19, we are concerned that no mention was made of a guiding standard for the work of the PCC SCS. It is paramount that the Task Group considers the role of Z39.19 in the creation of controlled vocabularies, and that the RDA appendices conform to this standard.

3.2

"The need for a process to manage the development of the lists is made more urgent by the absence in MARC 1XX and 7XX of any way to identify a term's source vocabulary."

The special collections community has a long history of using relationship designators, and identification of the source of a term has not been an issue. We question the level of concern, which is certainly not present in RDA, over identifying sources of terms. Nowhere is it implied that relationship designators in an RDA record will be sourced from an RDA list. Concern over terminology sources would be better handled by a MARC proposal.

## 4.1.1

"If you cannot ascertain a more specific relationship, assign the element term, e.g., Creator or Publisher."

Although the BSC is strongly in favor of using "publisher" as a relationship designator, and acknowledges the importance of "creator" in the archival community, the above statement seems to violate principles of the Task Group's report, as neither "creator" nor "publisher" is an RDA relationship designator. Neither is a discrete term appearing in the appendices with a scope note to guide in its application.

5.1

"Specialist communities may establish their own methods for vetting new relationship designators from their communities and submitting those terms to the JSC."

The special collections community has been developing its own controlled vocabulary since 1983 through the concerted efforts of RBMS and ACRL. Guidelines appropriate to the construction and maintenance of the vocabulary have been firmly in place for decades. Changes to guidelines and workflows, specifically requisite approval of terminology by an additional agency, will impede our progress, limit our effectiveness, and perhaps limit our terminology. If our list were submitted to the JSC at present, there is considerable doubt that several key terms (publisher, bookseller, and distributor) would be accepted.

Several months ago, the BSC discussed and rejected the option of submitting our relationship designators for inclusion in RDA, as we prefer to retain control of *RBMS Controlled Vocabularies: Relationship Designators*, a cataloging resource in its own right.

5.2

"PCC catalogers may use a term not in the RDA lists if they have also submitted the term to PCC SCS for inclusion in RDA."

As the RBMS Controlled Vocabularies are developed by and according to the needs of the special collections community, it is not logical to have terms we have been using for years, or our new proposals, vetted by another body before we are permitted to use them.

This restriction leaves specialist communities no recourse if a proposal is rejected. Examples of particular importance to the special collections community are "publisher," "distributor," and "bookseller." None of these are RDA relationship designators, and it is our understanding that the JSC has no interest in adding these terms to Appendix I. Implementation of the guidelines recommended in the report would mean that these relationship designators, some of which are acknowledged by the TG in C5 as core to the special collections community, could no longer be used. This is not an acceptable outcome and is wholly contrary to the intentions of the JSC.

## Appendix A:

"A.2.3 Charge a PCC group to evaluate relationship designator terms that are used by specialist communities but are not currently in the RDA appendices."

We strongly agree with A.2.3, but regret that this was not central to the TGs initial charge. It would seem prudent to consult with specialist communities, particularly those with a strong history of using relationship designators, before codifying instructions that will affect those communities. Charging such a group is an essential next step.

"A.2.7 Undertake a review of OCLC and other available data on usage of relationship designators after the first year of implementation and survey libraries and specialist cataloging communities on extent of adoption and obstacles encountered. Reevaluate guidelines in the light of the information gathered and consider issues requiring further work."

We strongly agree with A.2.7.

Appendix C:

C.5 Rare books and manuscripts

"The RBMS Controlled Vocabularies subcommittee has proposed scope notes to guide application of relationship designators by rare books and manuscripts catalogers."

To be clear, these are not proposed scope notes; these are the actual scope notes associated with terms in the RBMS list of relationship designators, which have been reviewed and approved by the BSC.

Although the special collections community benefits from the use of the terms "publisher" and "bookseller" we are confused by the presence of non-RDA terms in a list of PCC-recommended relationship designators.

There are also a few errors in the chart. As the scope note for "honouree" suggests, the term is item-level. "Honouree of item" is the appropriate RDA term. The term also represents a critical area in which RDA and RBMS terminologies diverge. The RDA term uses British spelling, while RBMS uses American spelling (Z39.19 recommends dialectical consistency throughout a vocabulary).

The RBMS relationship designator "binder" can be either manifestation-level or item-level, depending on whether one is tracing the binder for all of the copies in a particular manifestation or the binder for a unique binding on a single copy. The RBMS relationship designator "bookseller" may also be either manifestation-level or item-level depending on whether one is adding the tracing for a name in 260 subfield b, or one is adding a local tracing for the seller of a specific copy.

We request that the PCC Relationship Designator Guidelines Task Group reconsider the above areas of its report, and specifically, that it endorse rather than forbid the use of relationship designators found in other controlled lists, without subjecting such terms to vetting by PCC SCS. Adopting the recommendations of the Task Group's report will force special collections catalogers (and their institutions) into the position of having to choose whether to follow their communal standards (developed after a great deal of thought and discussion) or those of PCC. That will likely result in fewer records being coded PCC, creating problems for shared record use.

Sincerely, Ryan Hildebrand, editor, RBMS Controlled Vocabularies Jane Carpenter, chair, RBMS Bibliographic Standards Committee