To: Joint Steering Committee for Development of RDA
From: Kathy Glennan, ALA Representative
Subject: Revision to RDA 16.2.2.8 (Place Names for Jurisdictions)

ALA thanks LC for this proposal to clarify instructions relating to place names for jurisdictions. While we are sympathetic to the goals of the proposal, we do not support it. Instead, we would prefer to retain the current structure, re-caption 16.2.2.8, and rework the organization of 16.2.2.8.1, as described below.

We note that the final wording of this instruction may be affected by the JSC’s decision on 6JSC/TechnicalWG/4.

Re-captioning 16.2.2.8
While ALA agrees that the caption for 16.2.2.8 should be changed, we prefer phrasing that clearly represents what these instructions are about. Our proposed change will help cataloguers easily identify the instructions for when to include vs. omit a term indicating a type of jurisdiction in the preferred name for a place. We recommend using:

Place Names Indicating a Type of Jurisdiction

Retaining the sub-instructions
ALA recommends retaining the sub-instructions in 16.2.2.8; there are still two distinct categories that are addressed here:

• When the place name already includes a term indicating the type of jurisdiction.
• When the place name does not include such a term, but one is needed to distinguish places with the same name but different types of jurisdiction.

We believe that simply referring to 11.7.1.5 and 11.13.1.6 in the proposed new paragraphs for 16.2.2.8 does not provide sufficient guidance for the second case.

Restructuring 16.2.2.8.1, Place Names That Include a Term Indicating Type of Jurisdiction
ALA recommends restructuring these instructions, so that the primary instruction would be to include the term indicating the type of jurisdiction. The instruction to omit the term under certain conditions would be an exception. We recommend the following:
16.2.2.8.1 Place Names That Include a Term Indicating Type of Jurisdiction

If a place name includes a term indicating the type of jurisdiction, record the term as part of the preferred name.

**EXAMPLE**
Città di Castello (Italy)
Ciudad Juárez (Mexico)
District of Columbia
Distrito Federal (Brazil)
Mexico City (Mexico)

**Exception**

If:

- the first part of a place name is a term indicating a type of jurisdiction
- and
  - the place is commonly listed under another part of its name in lists published in the language of the country in which it is located

then:

- omit the term indicating the type of jurisdiction.

**EXAMPLE**
Kerry (Ireland)
*not* County Kerry (Ireland)
Ostholstein (Germany)
*not* Kreis Ostholstein (Germany)

In all other cases, include the term indicating the type of jurisdiction.

**EXAMPLE**
Città di Castello (Italy)
Ciudad Juárez (Mexico)
District of Columbia
Distrito Federal (Brazil)
Mexico City (Mexico)
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16.2.2.8.1 Place Names That Include a Term Indicating Type of Jurisdiction

If a place name includes a term indicating the type of jurisdiction, record the term as part of the preferred name.

**EXAMPLE**
- Città di Castello (Italy)
- Ciudad Juárez (Mexico)
- District of Columbia
- Distrito Federal (Brazil)
- Mexico City (Mexico)

**Exception**

*If:

- the first part of a place name is a term indicating a type of jurisdiction

*and*

- the place is commonly listed under another part of its name in lists published in the language of the country in which it is located

*then:*

- omit the term indicating the type of jurisdiction.

**EXAMPLE**
- Kerry (Ireland)
  - *not* County Kerry (Ireland)
  - Ostholstein (Germany)
  - *not* Kreis Ostholstein (Germany)

**Index changes**

ALA notes that if the JSC approves the removal of 16.2.2.8.1 and 16.2.2.8.2, two links in the RDA index will need to be updated:

- Jurisdiction, type of
  - added to government names, **11.7.1.5, 11.13.1.6, 16.2.2.8.2**
  - place names, **16.2.2.8.4**