



*American Association of Law Libraries*  
MAXIMIZING THE POWER OF THE LAW LIBRARY COMMUNITY SINCE 1906

TO: Members of the Library of Congress Working Group on the Future of Bibliographic Control

FROM: The American Association of Law Libraries

DATE: December 15, 2007

SUBJECT: Comments on Draft *Report on the Future of Bibliographic Control*

Thank you for the opportunity to submit comments on the November 30, 2007 draft *Report on the Future of Bibliographic Control*. The following comments reflect a comprehensive review of the draft report by AALL's Technical Services Special Interest Section, and have been endorsed by AALL's Online Bibliographic Services Special Interest Section. While we appreciate that the Library of Congress Working Group's deadline for submission of the final report to the Library of Congress is January 9, 2008, we regret that such a short timeframe has been provided for interested stakeholders to submit comments.

We appreciate the substantive progress the LC Working Group has accomplished to date and we agree with your vision of a future of bibliographic control that is "collaborative, decentralized, international in scope, and Web-based." In general, AALL supports the findings of the draft report and endorses many of its recommendations. We believe the LC Working Group did an excellent job with its difficult charge.

However, we do have several broad comments about the draft report which we would like to bring to your attention, as well as some specific concerns regarding a number of the recommendations. Our greatest concern about the draft report is that, as the saying goes, the devil's in the details. It proposes a number of important recommendations without stating how they will be implemented. Many of the recommendations propose new ways of partnering with various stakeholders, including the private sector, with no mention of what the incentives will be. That needs to be thought out and articulated, particularly when it comes to the for-profit world.

We also believe that overall the draft report lacks an awareness or recognition of successful initiatives already underway, both within and outside of the library community. The draft report, as it seeks to envision future models, fails to acknowledge

the important interdependencies within the cataloging community that have historically been very successful. In order to build new collaborations outside of libraries, we need to be interdependent both within and outside of the library community.

AALL recommends that the Library of Congress consider continuing the important work of the LC Working Group. We believe that the crucial next step is the development of an implementation strategy for each of the five sets of Findings and Recommendations. We would expect that the LC Working Group continue a collaborative and open process by seeking comments from stakeholders as details are developed and proposed for implementation. AALL is willing to participate in these ongoing discussions to determine ways in which the law library community can contribute substantively to the future of bibliographic control.

AALL's concerns about specific items and recommendations in the draft report follow.

## **1. Information Access as a Public Good**

The following paragraph appears on page 8 of the draft report, under the section heading "Redefine the Bibliographic Universe":

"Once considered a public good, information access is today a commodity in a rapidly-growing marketplace. Many information resources formerly managed in the not-for-profit sector are now the objects of a significant for-profit economy. Entities in this latter economy have financial capabilities far beyond those of libraries. Further, they have the resources to engage in large scale research and development."

AALL believes that information access *continues* to be a public good and we would not like to lose sight of that by considering a wholly market-based model of information access. Not-for-profit entities (i.e., libraries) are still involved in providing access to information through bibliographic control; this activity incurs costs that are not recovered commercially. Perhaps the first sentence could be altered slightly to read:

"Once **only** considered a public good, **information access today is also a commodity** in a rapidly-growing marketplace."

## **2. Sharing Metadata**

The following appears on page 11, under the section 1.1 ("Eliminate redundancies"):

"Publishers can provide some elements of descriptive metadata in electronic format for much of their output and libraries need to capitalize on those metadata. The abstracting and indexing industry has the

capability to utilize existing products to disaggregate the data they compile to supply metadata at the article level. Despite the fact that descriptive metadata are being created in venues such as those mentioned above, however, libraries have so far taken minimal advantage of them.”

How confident are we that publishers are willing to share their metadata with libraries? If libraries have so far taken minimal advantage of metadata created by publishers, it may not be the libraries' fault. Publishers create metadata toward the goal of selling their publications; it is not in their financial interest to provide anything beyond the bare minimum of metadata needed for commercial purposes. This bare-bones metadata could be useful to libraries, but without financial incentives, there's no reason to believe that publishers will want to share metadata created for commercial purposes with libraries. Is it cost-effective for libraries to pay publishers for basic metadata that libraries can re-create in-house? In fact it may be, but we should not make this assumption without empirical data to support it.

### **3. Legacy Data and New Metadata Carriers**

On page 22, recommendation 3.1.1 urges the development of “a more flexible, extensible metadata carrier.” We understand the need to make our bibliographic metadata compatible with Web technology. We also believe, however, that it is Web technology that needs to be made to work with MARC, and not the other way around. Over the course of four decades, libraries have demonstrated the flexibility of the MARC format by adapting and changing it to accommodate changes in the bibliographic landscape. Likewise, libraries are well-positioned to help the Web community exploit that data. Libraries worldwide have made a huge investment in encoding bibliographic information into MARC; even so, existing catalogs do not fully exploit the rich data encoded in MARC records. The draft report does not address the question of who would shoulder the cost of converting legacy MARC data into a new Web-friendly format. It does not make sense for each library to bear the burden of this cost individually. Rather, it would be more cost-effective to invest in the development of a Web-based tool that can interpret and/or convert MARC-encoded data to make it more Web-friendly. Here is where we need to be interdependent both within and outside of the library community. That is really the only way that Web developers will be able to exploit the data within the MARC record.

### **4. Computational Indexing**

On page 32, recommendation 4.3.4 urges the recognition of “the potential of computational indexing in the practice of subject analysis.” Exploring the potential of computational indexing may prove worthwhile, but we must also recognize its limits; i.e., computational indexing of a text will necessarily yield a result that is expressed in the language of that text. In other words, computational indexing of a text written in French

will yield potential subject terms in French, not English. The terms generated by computational indexing of non-English-language texts would have to be translated into English in order to be useful to English-speaking users of our metadata. The day may come when machines can perform this kind of translation, but we are not there yet.

## **5. Recommendations AALL Strongly Supports**

AALL does not have any particular reservations about any of the other recommendations in the draft report, and in fact we enthusiastically support many of them. We are gratified by the LC Working Group's recognition of the importance of authority control and controlled subject vocabularies, and we support recommendations that authority information and controlled vocabularies be made more widely available via Web-based platforms. We also strongly support recommendation 3.2.1 ("suspend work on RDA") for the reasons stated by the LC Working Group. There is as yet no evidence that the theoretical constructs upon which RDA is based are valid. We therefore believe that work on RDA should be halted but that research in this area should continue. The financial implications of the adoption of a code based on unproven principles are staggering, not only for the Library of Congress but also for libraries worldwide.

In conclusion, AALL believes that the draft report of the LC Working Group is an important step forward. We urge the Library of Congress to consider continuing its work in the same open and transparent fashion that has proven so successful during the past year. The crucial next step is to develop an implementation strategy. AALL and our members look forward to participating in and contributing to these important discussions on the future of bibliographic control.

We thank the LC Working Group for its fine efforts, and for giving the library community at large the opportunity to respond to its recommendations.

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