# PCC SCS comments on RDA part I

submitted February 2006, Paul J. Weiss, Chair, PCC SCS Comments in red are the ones that I feel are of greatest importance. --Paul

## **Overall comments**

We appreciate that JSC heard many of the comments that were made in the review of AACR3, and made significant changes that we see now in RDA. However, after much reading, thinking, and talking with colleagues, with very mixed emotions, Some of us feel that we need to again stop the current process and take an even more radical change of course. We don't say this lightly, as we greatly respect the people most closely involved with RDA development. Although this draft is a definite improvement, it has not gone far enough to become a modern, useful, usable metadata standard. A reorganization of rules with increased consistency is great, but is not worthwhile on its own to engender so much work. We strongly agree with Karen Coyle that "if we in the library field do not develop cataloging rules that can be used for this digital reality, we will find once again that non-librarians will take the lead in an area that we have assumed is ours." We more firmly believe now that it is far more important to get out a good standard, rather than one that can be published in a certain year. We doubt that we will likely never again such a golden opportunity for us to have a major positive impact in the broader information community.

As was suggested at Midwinter, some of us feel that we should restructure RDA as a data dictionary and application profiles. Such resources as MARC 21, EAD, VRA Core, and METS provide good models of a data dictionary structure. The data dictionary structure enforces consistency across element descriptions and makes it much quicker to find needed information in the standard. RDA should develop a method for registering application profiles. Each application profile would deal with such aspects as mandatory-ness, repeatability, transcription, data normalization capitalization, abbreviation, etc.), sources of information, level of granularity of a resource, level of specificity of elements (*title* vs. *title proper* + *parallel title* + *variant title* + ...), community-specific examples, etc. All RDA records would be explicitly identified as complying with one or more application profiles.

Currently in RDA there is some implicit hierarchy to data elements: the *title* element is composed of the *title proper*, *parallel title*, *variant title*, etc., subelements, for example. This is helpful, because it allows such sections as 2.3.0 to have scope over many particular subelements. There are some anomalies (the *edition* element is composed of the *edition statement*, *statement of responsibility relating to the edition*, etc., subelements, but the *edition statement* subelement seems to be composed of itself and the *parallel edition statement*), and these should be avoided. We should be more explicit with these hierarchies, because knowing about them will matter when different communities decide the structure/format/syntax for storing and exchanging RDA records. We also need to take more advantage of them, to help us with intrarecord interelement relationships, such as between a publisher, a place, and a date.

We strongly agree with Karen Coyle that RDA is "more about how cataloging was done in the past than how it might be done in the future. This is cataloging done by people sitting at desks with the item in hand, contemplating title pages, covers, prefaces, etc. ... There is also no recognition that many digital libraries expect that in the future much cataloging will have to be done by automated means in order to have any chance of creating metadata for digital resources. ... And we need to create cataloging rules that take into account the reality of machine-to-machine communication and the derivation of data elements by algorithms."

It is time for us to realize that we are not in the cataloging business. We are in the information services business. In the past, our traditional cataloging supported those services. However, the world is a vastly different place than it was when we first standardized cataloging. Metadata is far more generally available than it used to be, and comes in many more varieties of types, formats, sources, extents, and qualities. Administrators in libraries and their parent organizations continue to face limited budgets and increased calls for accountability. We need to ensure that our policies and practices are cost-effective. That is, we need to show that we deliver metadata that is worth more than the cost of producing it. The current path of RDA does not lead to such cost-effective instructions. As a profession, we need to face the new reality and evolve, or we will die. If we don't produce a 21st century standard, others with far less experience with metadata will. As Diane Hillmann has written, "There is no other alternative-we are already late to the table, and we come with a reputation for impatience with those who do not have library training."

One example of an issue for which changes in the world around us necessitate our relooking at the cost-effectiveness of what we are doing is duplicate detection. Some of us feel that duplicate records had a far more negative impact in the past than they do now. We need to consider the possibility of simplifying some rules so that metadata production will be faster and cheaper and able to be created by people other than fully trained catalogers, recognizing that we may generate some duplicate records along the way. It may be more cost-effective to generate 100 metadata records that may duplicate a couple of pre-existing records than only generate 70 records with no duplication.

We feel more strongly than ever that it is folly to believe that RDA can be effectively developed piecemeal. We need a tightly integrated standard, and each part informs the others. There are too many places in this draft that relate to parts 2-3 to be meaningfully evaluated before the other parts are available.

As UC's BSTF report states, libraries "offer a fragmented set of systems to search for published information (catalogs, A&I databases, full text journal sites, institutional repositories, etc) each with very different tools for identifying and obtaining materials. For the user, these distinctions are arbitrary." We need to recognize this as our current environment, and design RDA knowing that we directly control a smaller and smaller portion of the metadata pie.

As UC's BSTF report states, "It can be helpful to think of metadata provision as an ongoing process versus a one-time event." We need to design RDA for a world where metadata gets

created in one place but then gets copied, modified, abridged, expanded, translated, mapped into another system, etc. RDA needs both to produce records that are repurposable (including use by metasearch engines) and to provide for the repurposing of non-RDA data.

Add a new section on the concept of cataloger's judgement, and one on what to do when you are unsure about a situation (such as when you do not know the mode of issuance).

Most of the information in the Introduction to part I and in chapter 1 would seem to have parallels in the other parts, so it seems odd that this type of information is covered in part I. We would go so far as to say that maybe there shouldn't even be introductions for the parts, but rather a single Introduction for the whole document. Also, create a single chapter 0, covering language and script issues, transcription, and formulation of notes, that would apply to all three parts. We have problems currently in AACR2: some topics are covered in the Introduction to part I, but not in the Introduction to part II, and catalogers are left trying to figure out whether they should use the principles of part I in part II. LCRIs for 0.X rules are forced to include instructions for part II because there is nowhere else for those instructions to go. We point out at individual rules various instances of this needed generalization.

RDA needs to deal explicitly with relationships among metadata elements for a single resource, such as parallel titles and their statements of responsibility, and publishers and their places. Structural metadata is needed to indicate such relationships. (This is an example of the disadvantage of separating content from formatting.)

A new section is needed to discuss database management, as more and more of our time is spent modifying existing records rather than working on new ones. The rules need to support this activity as well as they support initial cataloging.

In addition to an alphabetical glossary, and repeating some definitions in the text, it would be quite helpful to also have a hierarchically arranged glossary. For example:

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title ...
title proper ...
parallel title ...
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Strategic Plan, goal 4, 4th bullet says we will repeat definitions from the Glossary in the text. Although we think it is a good idea for users of RDA to have terminology discussed where it is being used, in addition to a glossary, repeating text usually becomes a maintenance nightmare, with some places getting revised, but not others, etc. We hope that for the online version the text will only exist once, but displayed in two (or more) different places.

Some of us believe that continuing the ISBD convention of maintaining differences between information recorded in *statements* and *notes* is not helpful in our modern world. There are metadata standards, such as Dublin Core, that do not even have a concept of *note*. If the library community could itself get out of this mindset of strict distinguishing of notes from other data, it would make it much easier to implement the repeatable 260 field for example. If the concept

of *notes* is retained, create a general section on notes in chapter 1, and treat notes as subelements of each of the other data elements, rather than as separate data elements.

In the past (often for display real estate reasons), we have allowed only one instance of many data elements. This is no longer justified in our modern environment. Even *title* can be repeatable without disaster. One example of how changing our thinking on this will make database management easier is data about previous iterations of integrating resources. If rules said "Retain [information] ... on earlier iterations ..." rather than "Make notes on" would make maintaining this records simpler.

A *Conventions used* section should be added to the (General) Introduction describing such conventions as typefaces, special symbols (such as the diamond introduced in 0.1.7), and bulleting (if used in any special ways).

# Objectives and principles document

We think the time spent on developing explicit objectives and principles has been quite fruitful. However, we agree with Diane Hillmann that "discussion has gotten quickly to the nitty-gritty, without spending sufficient time on the principles."

The intended difference between objectives and principles remains unclear.

- 1, Objectives, Adaptability: It is not clear what this objective means.
- 2, Objectives, Responsiveness to users needs: This objective needs to be weighed much more heavily than Representation or Attribution. We need to be user/service-centered first and foremost, and resource-centered a much more distant second.
- 2, Objectives, Responsiveness to users needs: If this is truly an objective that we want to achieve, then we need to allow for many more data elements (which of course can be optional). Examples include cover art for books, reviews, publisher blurbs, excerpts, color of the carrier, research methodology, disciplinary theory followed (such as relational grammar, lexical-functional grammar, government and binding theory, arc-pair grammar, etc., in linguistics), and source of funding.
- 2, Objectives, Responsiveness to users needs: As a basic requirement, FRBR has *find* not just for works and expressions, but also for manifestations. This objective should also include locating manifestations.
- 2, Objectives, Continuity: As we already have to deal with many non-AACR records (both pre-AACR2 as well as those based on other standards), we think objective should be relatively low on the totem pole.
- 2, Principles, Differentiation: We should strive for differentiation not just for entities in our local files, but also in broader national and international files.

- 2, Principles, Relationships: It is unclear how these two principles (for descriptive data and access point data) differ. Are they intended to be the same, except for type of data? If so, let's merge into a single sentence.
- 2, Principles, Representation: We need to become more user-focused, rather than resource-focused. Also, this purpose will likely be difficult for other metadata communities to understand.
- 2, Principles, Attribution: We do not serve our users well by knowingly using inaccurate data in the main part of the description. Accurate data should be used for title proper, etc., with inaccurate source data transcribed in notes, etc.
- 2, Principles, Common practice: It is unclear what this sentence means.

This is how we see the draft of part 1 relative the stated objectives and principles, on a scale of 1 to 5:

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1. Objectives and Principles for the Design of RDA
   Objectives
      Comprehensiveness = 3
      Consistency = 4
      Clarity = 3
      Rationality = 2
      Currency = 3
      Compatibility = 3
      Adaptability = [not sure what this one means]
      Ease and efficiency of use = 3
      Format = [not yet clear]
   Principles
      Generalization = 4
      Specificity = 3
      Non-redundancy = 1
      Terminology = 2
      Reference structure = 1
2. Functionality of Records Produced Using RDA
   Objectives
      Responsiveness to user needs = 3
      Cost efficiency = 2
      Flexibility = 4
      Continuity = 5
   Principles
      Differentiation = [can't say without parts 2-3]
      Sufficiency = 4
      Relationships = 3
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Representation = 5
Accuracy = 5
Attribution = [parts 2-3 issue]
Common usage = 4 [but we haven't reviewed chapter 3 or the GMD/SMD report yet]
Common practice = [can't say without parts 2-3]
Uniformity = 5

# Draft of part I

What is the title of part I?

We very strongly support the separation of metadata vs. its presentation, and focusing RDA on metadata proper, although we are concerned about how various data for one element will display. There are a number of rules that still deal with presentation topics, however, such as square brackets, capitalization (beyond normal English, etc., style), the hyphen in numbering, the question mark in publication (etc.) dates, copyright symbols, parentheses around standard number qualifiers, and punctuation in dissertation information.

This draft is written more tightly than what we saw last year. However, the document still suffers from textual bloat--it is much longer than it needs to be. The primary (web) version of RDA will not be improved by redundancy. Other better ways to provide context and help navigation were discussed at the ALA Editions focus groups. We point out several instances of superfluous text at individual rules.

This draft is till too centered on print, text, and resources in the West European/North American publishing tradition; we point out specific examples below. It is perhaps wise to even go beyond format and type of content neutrality, to putting more effort into types of resources that even digitally in full form are less easy for users to find. Full text can be indexed and searched relatively well compared with musical sound recordings, moving image materials, photographs, etc. Perhaps it is time to be focused more on non-textual resources.

We prefer the meaningful chapter numbering in the draft of AACR3 to what is in this draft. It also allows for easier addition of new chapters.

The cataloging community's use of *description/descriptive* does not match the use of those terms by other library folk, nor by the larger metadata community. For example, the NISO document *Understanding Metadata* defines *descriptive metadata* as "metadata that describes a work for purposes of discovery and identification, such as creator, title, and subject." Also, we currently use *description* in two different ways: a set of descriptive data for a resource, and the normal dictionary definition. Context does not always provide sufficient evidence to quickly and easily decide which meaning is intended. The seeming non-existence of substitute terminology is additional evidence that our distinction between subject and non-subject descriptive metadata is not useful (We have additional comments on this point at 0.1.0.). We propose that we observe the following usage:

descriptive: the sense described in the NISO definition above

description: normal English usage record: the set of data that describes a resource

If rule numbering is deemed useful (before it always seemed to be, but now is not clear if it really is), number every level of hierarchy. For example, in 2.3.2, give the sections *Choosing the title proper*, *Recording the title proper*, and *Change in the title proper* numbers. Yes, this adds levels to rule numbers, but it provides for a more realistic structure. These "hidden" levels of hierarchy in AACR2 in Cataloger's Desktop cause problems—they are missing in TOC displays, links that apply to the whole section appear at the end of the previous rule, and therefore are very easy to miss, etc.

A style sheet would produce a more readable and consistently written document. I've pointed out many examples of lack of readability and consistently in our specific comments below. Here are a couple general examples:

Pick either "source of information" or "source" as the wording to use, and use that as much as possible.

Do this also with "numbering" and "enumeration or alphabetic designation".

The philosophy for the top-level structure of part I (other than chapter 1) is unclear. 0.1.4. says that "chapters 2-6 each cover a set of descriptive data elements that support a particular user task (e.g., identify or select)". It appears that the relationship between user tasks and part I chapters is:

chapter 2 find and identify chapter 3 select chapter 4 select chapter 5 obtain chapter 6 all, as they relate to items

What is the advantage of chapters 3 and 4 being separate, rather than being combined to form a single chapter for *select*. We realize that FRBR section 7 explicitly does not include user requirements related to items; nevertheless we would benefit from splitting this chapter up by user task, and moving those pieces to the relevant user-task chapter. If this is not done, the quotation above needs to be reworded to be accurate.

We're also concerned that RDA still requires us to base the description of a reproduction on the reproduction, rather than on the original. Since it is a long-standing practice that US libraries will likely continue to follow regardless of what RDA says, and for good reason, describing a reproduction based on its original needs to at least be an option. Evidence shows that users primarily want and need the data about the original publication, not the specifics on when it was digitized or microfilmed. Another option would be to follow FRBR more closely and either create descriptions for both and treat them as related resources, or in one description record data for both, with each data element labelled as to which it belongs to.

It is more helpful to organize and label instructions by the situation the cataloger has, rather than by the result of following the instruction. I've pointed out examples in our specific

comments below. One example is 2.3.0.4 and 2.3.0.5 are labelled "Names of persons and corporate bodies" and "Introductory words, etc." respectively. These would be more helpful if merged, under the rubric "Determining the title".

One of the major problems we are seeking a solution on from AACR2 is multitype resources. This draft does not yet achieve that (such as in 2.2.1); specifics are in comments below.

It is not clear why wording about options varies, such as:

if it is considered to be important ...
... considered to be of particular importance
if it is considered to be necessary
optionally

Standardize the wording, and/or move all of this to 1.4.

Do not use the arrow bullet for general instructions. It reduces readability, loses meaning via ubiquity, is inconsistently utilized, and unnecessarily lengthens the document due to more white space.

Delete all instructions for prescribed punctuation. Rather, treat the pieces of data punctuated as separate data elements, with specified structural metadata as needed. If you retain any prescribed punctuation, centralize all such instructions in one section (probably also keeping such instructions in the elements).

Make clear that certain data elements only apply to particular kinds of resources, such as frequency only applying to resources issued in multiple parts.

Because the word *comprise* can mean either *compose* or *be composed of*, alternate terminology (perhaps *consist* of and *constitute*) would be clearer.

More modernization and dejargonization is needed. Some specific examples of this are described in comments below

Without the glossary, we cannot fully evaluate part I. In particular, we need to see: transcribe, record, supply, devise archival resource facsimile, reproduction (define reproduction broadly enough to include facsimiles; then we can use just one word)

# Introduction to part I

It is unclear why some general information is in the introduction, and why some is in chapter 1.

It would be much easier to digest and utilize information currently given in this Introduction if it were split between background information, and actual instructions. It would seem unnecessary, even counter-productive, to give background information rule numbers. The

content that is instructions (0.1.2, some of 0.1.6, and possibly 0.1.8 (intent here is not clear)) would be best placed in chapter 1.

One section that is missing is one on what kind of information to expect at each data element. This is an important part of any well-conceived standard containing elements. See these resources for examples of this:

CONSER Cataloging Manual, Introduction to Part 1, paragraph 5

CONSER Editing Guide, D1. Content, Organization, and Layout

Content Standard for Digital Geospatial Metadata, Organization of the Standard

DCMI Metadata Terms, Section 1. Introduction and Definitions

Encoded Archival Description Tag Library, Tag Library Conventions

Getty vocabularies (Getty Thesaurus of Geographic Names, Art & Architecture Thesaurus, or the Union List of Artist Names), About the [vocabulary], Information in the Record (Fields)

Library of Congress Subject Headings, Components of Entries

MARC 21 format (any), Introduction, Organization of This Document, Components of the Detailed Descriptions

Medical Subject Headings, XML MeSH Data Elements, Key to element information

Thesaurus of Graphic Materials, Introduction, I.C. Structure and Syntax

UDC MRF Database Development and Design, Database structure

UNIMARC Manual: Bibliographic Format, 2. Organization of the Manual

VRA Core Categories, Category attributes

many XML DTDs and schemas

The section headings in 0.1 are inconsistent: 0.1.1 and 0.1.2 include "resource description" while 0.1.0, 0.1.3-0.1.9 do not. Only the heading for 0.1.4 includes "Part I".

If it is correct that there will be no other content between this Introduction and chapter 1, renumber all the sections of this Introduction from 0.1.X to just 0.X.

The paging of this Introduction does not match that of the rest of the draft.

## 0.1.0

As it stands now, part I of RDA most definitely does *not* "provides a comprehensive set of guidelines and instructions on recording data to describe a broad range of resources in both analog and digital formats." As has been pointed out before, it does not contain any guidance on many areas of bibliographic descriptive metadata: not subjects, classification, or shelflisting, and not all the specialized metadata for particular media or types of content. Although this is likely not what was intended, the quotation above comes across as pompous and insulting. The word "comprehensive" needs to be removed if the scope does not change.

The traditional cataloging segmentation of bibliographic data into descriptive data (or descriptive and name/title authority control data) and subject data is an artificial one, that is not shared with the larger metadata community or, we would venture to say, our user communities.

Not covering subject headings, but including *nature and scope of the* content will not make sense to those uninitiated in traditional cataloging. We need a document that looks--at the highest level--at what a whole bibliographic metadata record should be: general philosophy, element list, references to other standards. RDA development has already made such important strides towards this, that it is a shame for JSC to not go that last step. If RDA doesn't provide this top-level perspective, it is likely that others (most likely computer folk, not librarians) will, and RDA will be relegated to a lesser role in metadata circles. This is a golden opportunity for our community, and we should not hesitate to seize it.

# 0.1.1

FRBR should be covered here.

If one of the reasons we are keeping successive entry cataloging for serials is to be compatible with ISSN cataloging practices, that should be covered here.

# 0.1.3

Delete the superfluous second and third sentences.

## 0.1.5

Either use a title such as "Intended use", which would more accurately describe the content of this section, or merge this into 0.1.4, since it is about structure.

Instructional manuals and reference tools serve very different purposes. The tradeoffs caused by trying to be both kinds of document make RDA less successful at being either. We should focus RDA to be a reference tool--a document that establishes a standard. Training material should be developed separately.

### 0.1.6

This section should probably be deleted; this information is also given at other, more logical places in the document.

If this rule is retained, given that parts 2-3 are not available, we cannot fully evaluate this rule.

The last paragraph is a very long sentence whose meaning is unclear.

# 0.1.7

It would be helpful to differentiate options that allow additional information to be recorded (such as at 2.3.0.5) from those that would result in *different* data being recorded (such as at 2.3.7.3). From a cooperative cataloging perspective, the latter are a much bigger concern than the former.

# 0.1.8

Extend this section to include script preferences.

To facilitate broader sharing of records, specify that the cataloger record the language of the description, and each use of data in the language of the catalog needs to be treated as a separate data element so that automatic translation can be applied as records are shared throughout various language communities

# 0.1.9

The first paragraph should be deleted. All examples should completely conform to RDA. We should not have any examples at one rule that contradict instructions given at another rule.

Delete the superfluous second paragraph. At any example we can give a note to help provide context; this is normal English usage.

# Chapter 1. General guidelines on resource description

Move information that is not instructions (this would seem to be 1.0 and 1.1) to an unnumbered introductory section.

### 1.0

Delete this superfluous section; it is just a textual version of the TOC.

### 1.1

Change the title to *Types of resources* (moving 1.1.4 out, as described below).

Delete the superfluous first two sentence. At least delete the parenthetical, as it is only makes sense for documents that are primarily used in a linear fashion.

Move the third and fourth sentences to the General Introduction, as they have scope for the whole document.

# 1.1.1-1.1.4

We applaud the splitting apart of the actual definition from illustrative and exemplifying text for *resource*. Please do the same for the other definitions.

It is unclear why it was decided to present here these particular terms, but not other terms used in the chapter.

Most of the bulleting in these sections is inappropriate. The text at those bullets is not logically subordinate to the first sentence of each section; the bulleting should be removed. The second through fifth bullets in 1.1.1 are indeed subordinate to the current first bullet, and their bulleting is appropriate.

### 1.1.1

Delete the superfluous first sentence.

The first bullet implies that some terms might be used differently in different parts of RDA. Please do not do that; use each term consistently throughout the whole document. The bullet also is an example of the textual bloat we referred to above. It could be reduced to just the word and its definition without loss of meaning or readability: "**resource**: the entity that forms the center of focus for a resource description".

The definition of *resource* is not helpful; basically circular with the meaning of *description*. What is a resource? What a description describes. What is a description? Information about a resource. As the LOM and Dublin Core folks said at our CC:DA meetings in San Antonio, RDA needs to have a conceptual model of the resources it attempts to describe and give access to. It would seem easiest to use the FRBR group 1 entities. The document would be much tighter and more consistently understood if *resource* were replaced with *work*, *expression*, *manifestation*, and/or *item*, as appropriate. RDA needs to engender a common understanding on what it is that it describes. Can a person, for example, be described as a resource? What about other types of records that are currently in the MARC21 Community Information Format?

Resources exist whether or not there is a description of them. For example, the fact that we use a comprehensive description for a conference proceedings does not mean that the individual papers are not resources. This is also arises when discussing other related resources. Also, the phrase "center of focus" seems redundant. The definition could at least be reworded as "an entity that is or could reasonably be the focus of a descriptive metadata record".

Undescribed resources have the same variety of forms as those described; change "The resource described" to "A resource" in each the bullets.

The fourth bullet describes two subtypes of one of the types described in the previous bullet. Either combine into a single bullet, or indent this bullet under the third one.

The fifth bullet phrase "after the fact" begs the question of after what? The sentence is fine without that phrase. And technically someone could assemble a collection before its components are published.

## 1.1.2

We like that the draft deals explicitly with intangible resources, but we don't think "logical units" will be readily understood by the average RDA user.

Another opportunity for us to be more user-centered is to change the focus of these definitions. We believe that users perceive the content of resources via attributes of work and expression, not attributes of manifestation. We currently distinguish between serials and integrating resources based on how the manifestations are issued. Our users would be better served if instead we distinguished on how new content is intended to be used. It doesn't matter to them whether the manifestation of the *Encyclopedia of Associations* is successively issued or integrating; it is the fact that the content is kept up to date that matters.. Redefine as follows (changes underlined):

# resource issued in successive parts

change from: a resource <u>that</u> is issued in a succession of discrete parts to: a resource <u>whose content</u> is issued in a succession of discrete parts integrating resource

change from: a resource <u>that</u> is added to or changed by means of updates that do not remain discrete and are integrated into the whole

to: a resource whose content is added to or changed by means of updates that do not remain discrete and are integrated into the whole

The first and third bullets include the word "issued" in their definitions. This seems to leave out assembled collections. We need either to define *issued* broadly, or change the wording to something like "issued or assembled".

There is a lack of parallelism in the terms and definitions; I've made specific suggestions below.

### first bullet

The definition given in the first bullet would include a 1-issue serial. I'm guessing that was unintentional?

The term described is rather long; *unitary resource* would be shorter.

Different RDA users could reasonably interpret the definition to either include or exclude single-volume non-updating loose-leaf material. The individual leaves may be seen be some as separate physical units. And some of these resources ship with the pages shrink-wrapped separately from the binder, definitely separate physical units. How about changing "physical" to "cohesive" ("cohesive" could include the web "logical units")? Or changing "issued either as" to "issued in a form intended to be used either as"?

### second and third bullets

There is still a need for an umbrella term for the types described in the second and third bullets. We suggest that we standardize on *multipart resource*.

The terms in the second and third bullets are unnecessarily non-parallel. Using *simultaneously issued multipart resource* and *successively issued multipart resource* would achieve worthwhile parallelism.

### second bullet

Excluding the exemplary parenthetical, the definition reads "a resource comprising two or more physical units or, in the case of an intangible resource, two or more logical units." That would include resources issued in successive parts, which does not seem the intent, given the phrase "issued as a set" in one of the parenthetical examples, and the third bullet. The definition needs to include wording such as "issues as a set" or "together".