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**ISO/TC 46/SC 9 N 268**

1999-05-11

To: Members of ISO/TC 46/SC 9  
Selected liaison organizations

cc. C. Deschamps, ISO/TC46/SC9 Chairperson  
ISO/TC 46/SC 9 Working Group 2 (ISWC)  
S. Clivio, ISO Central Secretariat

**SUBJECT: Responses from the Project Leader to comments on ISO Committee Draft 15707, Information and documentation -- International Standard Work Code (ISWC) -- Part 1: Musical Works**

The attached document contains responses from the ISWC project leader, Mr. Dominique Yon of CISAC, to comments on ISO Committee Draft 15707 for the ISWC standard.

**ACTIONS REQUESTED:**

- For **immediate distribution** to delegates to the May 1999 meeting of ISO/TC 46/SC 9
- For discussion at the ISO/TC 46/SC 9 meeting in Paris during the session on May 19, 1999.

**ONLINE VERSION:**

This document and a copy of CD 15707 are available on the ISO/TC 46/SC 9 Web site at: <http://www.nlc-bnc.ca/iso/tc46sc9/15707.htm>.

With regards,

*[original signed by:]*

Jane Thacker  
Secretary, ISO/TC 46/SC 9

**Draft Responses to  
Comments on ISO Committee Draft 15707  
International Standard Work Code (ISWC)  
by the Project Leader (Dominique YON)**

*Committee Draft 15707 was distributed on December 3, 1998 as document TC 46/SC 9 N 253. Voting result and comments were distributed on March 26, 1999 as document TC 46/SC9 N262.*

*CD 15707 was approved, with comments, by 100% of the P-members who voted. There were 3 abstentions (Portugal, Spain, and the U.K.). Comments on CD 15707 were submitted by the member bodies for: Canada, the Czech Republic, Denmark, France, Germany, South Africa, Sweden, and the U.S.A.*

## INTRODUCTION

**The responses to comments proposed below are subject to review by the member of the SC 9/WG 2 before the amendment of the draft to be submitted to the next ISO approval step.**

## General comments

### [1] Czech Republic (CSNI)

Registration of intellectual works through a standard number is according to our opinion a very useful thing. But it is a pity that there cannot be one standard for both musical and textual works.

**RESPONSE TO COMMENT 1:** Part 2 of the ISWC project will be dedicated to textual works (see introduction)

### [2] Denmark (DS)

Would a clarification of the relations to other standard numbers as ISBN, ISSN, ISMN and ISRC [+ EAN, ISAN, Label Code (IFPI) and UPC (Universal Product Code)] be beyond the scope of this standard?

What happens when the copyright of a work is transferred to another part?

**RESPONSE TO COMMENT 2:** ISBN, ISSN, ISMN, EAN, UPC numbers apply for products. The ISWC and the ISAN for audio-visual works apply for the work itself (i.e. the content), which is independent of any formats (i.e. the carrier) in which the work is issued. ISRC applies to recordings. A recording may be linked to a part of a work, or a work, or several works, or several parts of several works.

**[3] Germany (DIN)**

Germany votes YES on ISO/CD 15707:1998. The German standards committee, DIN-NABD welcomes the publication of ISO/CD 15707.

**[4] U.S.A. (ANSI/NISO)**

The “International Standard Music Number” (ISMN) and “International Standard Recording Code” (ISRC) are mentioned in the bibliography, but there doesn't seem to be any mention of the ISWC's relation to either. Should the relationship of the ISWC to these two standards be stated somewhere?

It is our understanding that the ISWC is intended to identify the intangible work rather than any manifestation of it. It should be pointed out more explicitly that the ISWC does not relate to any manifestation, but to the work itself. This is not sufficiently clear in the current draft.

**RESPONSE TO COMMENT 4 :** Yes, additional text in the bibliography, based on response to comment 2, should clarify this point.

**1 Scope****[5] Czech Republic (CSNI)**

It is not clear from this paragraph to which works the ISWC is to be assigned: in which institution these works must be registered and how they can be accessed? (Does the ISWC apply only to works registered by a national rights society?)

**RESPONSE TO COMMENT 5 :** ISWC may be assigned to any musical work – see A.1.1 eligible repertoire -. Registration of works are to be done via and with the co-operation of the network or national rights societies. On the principle, the access to ISWC databases containing supporting data is open, technical and financial conditions are under definition and will be coordinated by the International Agency as soon as the ISWC standard will be approved (same principle as for the ISAN System).

**[6] South Africa (SABS)**

The word “collecting” in the last row of section 1 (Scope) page 1 is not correct (N253). Collecting names of societies?

**RESPONSE TO COMMENT 6 :** Collecting societies means societies that collect royalties that are administrated collectively on behalf of society members who are the rightholders of the works.

## 2 Normative references

### [7] Canada (SCC)

Editorial comment: In the last sentence of the first paragraph, change “if IEC” to “of IEC”.

**RESPONSE TO COMMENT 7:** Agreed. The editorial modification is done.

### [8] U.S.A. (ANSI/NISO)

Typographical error in last sentence, which should read: "Members of IEC..."

**RESPONSE TO COMMENT 8:** Agreed. See response to comment 7.

## 4 Construction of the ISWC

### [9] Canada (SCC)

Editorial comment: The second sentence, regarding the distinguishing element, is not necessary, since the information appears further on in 4.1, which is dedicated to this topic.

**RESPONSE TO COMMENT 9:** Agreed. this sentence is deleted.

### [10]Czech Republic (CSNI)

In the presented example the music identifier is divided into three parts by dots. Has this division any meaning or not and the number is only a current registration number (as it is in the case of ISSN and further on in the text in the part 4.2.)?

**RESPONSE TO COMMENT 10:** The presentation of the number given by the example is just a recommendation to improve its legibility when it is displayed. The hyphen and the dots have no meaning and these special characters are not stored when the number is registered.

### [11] U.S.A. (ANSI/NISO)

COMMENT on the distinguishing element being the letter T:

It might be a mistake to limit the distinguishing element to one character. (If we have learned any thing from our Y2K problem, we should not be frugal with the number of characters reserved for various purposes.) One approach would be to assign a three-character identifier and that the choice for musical works be "MUS" which has the advantage of being a useful human mnemonic in most Latin character alphabetic languages.

**RESPONSE TO COMMENT 11:** The principle to revisit conventions for the distinguishing element is still open. A solution is to be considered, bearing in mind the 3 parts of the ISWC standard. Based on the USA comment, we could envisage :

- ISWC Part one: for Musical works
  - short distinguishing element to be stored when the number is registered in a data base: the letter M only (replacing T which is ambiguous)
  - extended distinguishing element to be displayed when the number is affixed to any kind of media and when it is useful to improve human understanding.- 5 letters MUSIC –
- ISWC Part two: for Textual Literary Works
  - short distinguishing element: T
  - extended distinguishing element: TEXT
- ISWC Part three: for Works of Visual Arts
  - short distinguishing element: V
  - extended distinguishing element: VISUAL

The use of the extended distinguishing element will remain optional, only for the display of the ISWC number. The ISWC number will always be stored using the short distinguishing element.

This proposal may have important impact in the project already in test in collecting societies. A meeting of the SC 9/WG 2 will be necessary to endorse this proposal before the adoption for the DIS stage.

## 4.1 Distinguishing element

### [12] Canada (SCC)

Editorial comment: The information in the second sentence, about the value applied to the distinguishing element, might be better placed in Annex B with the rest of the information about calculating the check digit.

**RESPONSE TO COMMENT 12:** Agreed. The second sentence is moved to Annex B.

**[13] U.S.A. (ANSI/NISO)**

COMMENT on check digit calculation:

It is not necessary to assign a numerical value to the distinguishing element and to include it in the check digit calculation. This comment also applies to Annex B.

**RESPONSE TO COMMENT 13:** See response to comment 12. We propose not to change the algorithm. The benefits to give a value to the distinguishing element is to generate distinct values of check digits, even if the same work identifier is used for several ISWC types (music or text or visual).  
This convention was adopted by those implementing the numbering system and it should be difficult to change it now without any explanation on benefits resulting from change.

**4.2 Work identifier****[14] U.S.A. (ANSI/NISO)**

Will 999,999,999 identifiers be enough, especially with the potential of so many excerpts, modifications, and composites eligible for their own number?

**RESPONSE TO COMMENT 14:** Experts on this evaluation have estimated that not more than 20 million works are to be numbered (4 million works maximum are in existing international data bases of collecting societies).  
In case of a shortage, we could envisage in the future to use alphanumeric values.

**5 Administration****[15] Czech Republic (CSNI)**

On which basis will the International ISWC Music Agency decide on establishing the local ISWC music agencies? The specification in the Annex A.2.2 which reads “in specific countries or regions” can be interpreted in the way that not in each country can an agency be established.

Will it be possible to group the agencies in accordance with territorial or language principle as it is in the ISBN system; or the main criterion will be concentration of musical societies and music activities in a region?

**RESPONSE TO COMMENT 15:** The “regions” where local ISWC music agencies will be established will be defined by the International ISWC Agency according to the requirements of implementing the ISWC System. Some agencies may have a broad area of coverage (e.g. by language grouping with a broad geographic area). Other agencies may be for a single country.  
The international ISWC Agency will designate and coordinate regional agencies to ensure that there is no duplication of work among them.

Example:

- LATINAUTOR, the group of the CISAC collecting society in Latin America is a candidate to be the ISWC Music Regional Agency for Spanish speaking countries.
- OSA, the CISAC music collecting society of the Czech Republic is a candidate to play the role of the national ISWC Music Agency in this country.
- Collecting Societies are represented in 95 countries, under the CISAC organization.

## **7 Association of an ISWC with digital content**

### **[16] U.S.A. (ANSI/NISO)**

COMMENT on the use of word “persistently”:

The text, “An ISWC may be persistently associated with...” is confusing. What is the intention of the word “persistently” in this context -- that the use of the ISWC is suggested but not required for the purpose of digital expressions, etc.? It is suggested that this sentence be clarified or that the word “persistently” be removed.

**RESPONSE TO COMMENT 16:** Agreed. If the word persistently is not clear we propose to remove it.

## **Annex A Guidelines for the use of ISWC in musical works)**

### **A.1.1 Eligible repertoire**

#### **[17] Canada (SCC)**

Will the ISWC database provide a straightforward way to find all the modified versions, excerpts and composite works derived from a particular musical work?

**RESPONSE TO COMMENT 17:** The answer is yes, via the management of links between ISWC numbers and the use of derivation codes.

#### **[18] Czech Republic (CSNI)**

Paragraph 1: How far into the past can a retrospective assigning of ISWCs go? 50 - 100 - 200 years back or less? Will a local ISWC music agency be authorised to decide about that?

Paragraph 3: Examples of modified versions:

What are these “minor corrections”? Who will be able to decide if they are already minor corrections or still not?

**RESPONSE TO COMMENT 18:**

Paragraph 1 – The principle is not to give a limit related to a time period but to allocate a number to existing works, taking into account the use of the work. Detailed rules will be specified by the International Agency in the Agency Manual. If a local agency decides that some very old works are used in its market place and from its repertoire, this local agency will have the initiative to allocate the number of such works.

**Paragraph 3** – Detailed rules will be specified by the International Agency in the Agency Manual. The basic logic is not to allocate a new number if minor corrections do not affect the intellectual properties.

[19] **Denmark (DS)**

RE Annex 4.1.1 Eligible repertoire. What are the criteria for being an existing work. Must it be published/publicly accessible and in which form e.g. on the Internet? Or accessible on a computer somewhere?

A demarcation to other branches of art should be defined as well as musical features in other works.

Who decides in case of doubt - the local agency or the international agency?

**RESPONSE TO COMMENT 19:** We propose to replace the first sentence by: “ISWC may be assigned to any musical work, published or unpublished, newly created or already existing, irrespective of its copyright status and irrespective of its distribution form (analogic or digital)”.

We hope this change will clarify the criteria. Projects for identification of works are ISAN for Audiovisual Work, ISWC with 3 distinguishing elements, one for music and songs, one for text, one for visual art (still image). We don’t know what the other branches of art and the needs for the definition of demarcation are.

[20] **Germany (DIN)**

We would like to suggest to insert in Annex A, A.1.1, first clause, as follows:

“ISWC may be assigned to any musical work, **published or unpublished**, newly created ....”

We think that the ISWC has also been assigned to unpublished and copyright protected works. This was the reference point when starting with this project. In the case of publication of unpublished works the number allocated would not be changed but another number as ISMN or ISRC would be added.

**RESPONSE TO COMMENT 20:** Agreed, see response to comment 19.



**[21] U.S.A. (ANSI/NISO)**

COMMENT on inclusiveness and examples:

Does this repertoire include recordings downloaded from the Internet?

Should the examples of modified versions be extended to include parodies such as P.D.Q. Bach's (other wise known as Peter Schickele) portrayal of portions of Beethoven's fifth symphony as a sports announcer's narration?

Should the examples of composite works be extended to include a collection of whimsical musical quotations such as that described in the Schickele parody above?

**RESPONSE TO COMMENT 21:**

- internet: see response to comment 19
- examples: The addition of the proposed examples is not recommended because parodies should be considered neither modified versions nor composites unless the creator of the parody enters into an agreement with the original copyright owners.

**A.2.2****[22] Canada (SCC)**

It would be helpful to see more detail about the meaning of the term "local" in this context and about how the local ISWC Music Agencies will be appointed.

**RESPONSE TO COMMENT 22:** The first sentence will be changed into: "There shall be local (national or regional) ISWC Music Agencies..."

The following paragraph will be added: "The main criteria taken into account by the International Agency to appoint a local Agency in a country or for a region are:

- the ability of the candidate of the local agency to manage a musical repertoire in its country or region.
- the authority of the candidate of a local agency to solve issues related to unique identification of musical work in its country or region."
- the capacity of the candidate to exchange information with the other agencies of the ISWC system for musical works, and to apply common detailed rules defined in the Agency Manual.

## A.3 Allocation of ISWC for musical works

### A.3.1

#### [23] Canada (SCC)

How will rights societies become affiliated with the local ISWC Music Agencies?

**RESPONSE TO COMMENT 23:** Societies collecting rights and representing authors and publishers in their country or region for musical works, confederated with the CISAC international organisation, are potentially candidates to be local agencies. The affiliation of other organisations with a local agency is a matter of a local relationship between these organisations and the local agency. For more local detailed information it is recommended to the author of the comment to contact SOCAN, the Canadian Society of authors: SOCAN, 41 Valleybrook drive.  
Don Mills, Ontario M3B2S6, Canada.  
Tel.(1) 416 445 8700. Fax (1) 416 445 7108

#### [24] Czech Republic (CSNI)

In which manner will a rights society have to be affiliated with a local ISWC Music Agency to get a ISWC from it? In which way will these institutions be registered in a local ISWC Music Agency when a ISWC has no prefix for identification of musical institutions? (If these should be a directory of participating institutions then how will it be currently maintained?)

Second sentence in this paragraph: If creators will apply for a ISWC each by himself and independently of each other and if they will not present identical supporting data, how can a duplicate assigning of ISWC be prevented?

**RESPONSE TO COMMENT 24:**

- Affiliation with a local Music Agency: see response to comment 23.
- Prefix for identification of musical institutions: a range of numbers is allocated to each local Agency. The registration of local institutions for a cooperative process of the allocation of the ISWC number in a country or in a region is a matter of relationship between the local institutions and the local agency.
- Directory: a directory of musical right societies in the world is available and maintained by CISAC.  
CISAC, 11 rue Kepler, 75116 PARIS.  
Tel. (33) 1 53 57 34 00. Fax (33)1 53 57 34 10  
e-mail: cisac@cisac.org

In the second sentence, the question does not address the issue of duplicate numbers, but the issue of the multiple ISWC allocation to the same work (see A.3.6).  
This situation is possible but this is also the role of the local Agency to identify similar

works and to take into account the information coming from creators and various right holders. The expertise of the local Agency to manage this kind of issue is a criteria to appoint a local Agency by the International Agency.

**[25] U.S.A. (ANSI/NISO)**

Does Section A.3.1 exclude original publishers as "creators" of a work? In our view any society that represents any Interested Party with ownership rights to a musical work should be allowed to request the allocation of an ISWC.

**RESPONSE TO COMMENT 25:** Co-ordination between Interested Party representatives is a matter of co-operation at the local Agency level. See responses to previous comments on this topic.

## A.3.6

**[26] Canada (SCC)**

Editorial comment: Change “same” to “a”, or to “the same”.

**RESPONSE TO COMMENT 26:** Editorial comment accepted. “Same musical work” will be changed into “the same musical work”

**[27] U.S.A. (ANSI/NISO)**

A.3.6 - This stipulation is in direct contradiction to the ideal of the standard number. We think it would be preferable to eliminate such duplication.

**RESPONSE TO COMMENT 27:** Disagreed. In practice, there are some cases where it is not possible to prevent temporarily multiple allocations of identification numbers to the same object (the ISAN project is in the same situation on this issue). The aim of the system is:

- to prevent as much as possible this situation thanks to the expertise of the local Agency in this matter.
- to link the ISWC numbers in the data base when the multiple allocation situation is identified.

The most important one is to use ISWC numbers as pointers to the additional documentation in data bases where conflicts are solved or where information is maintained to give common status on temporarily unsolved disputes.

## A.4 Supporting data

**[28] Denmark (DS)**

Re Annex 4 Supporting data d): The electronic media make compositions / adaptations / arrangements in innumerable varieties possible. Which one is the source work?  
Same problem with anonymous music e.g. folksongs.

**RESPONSE TO COMMENT 28:** A list of several source works may be submitted to supporting data and is administrated by the system. Additional detailed rules on these issues will be maintained in the Agency Manual.

**[29] U.S.A. (ANSI/NISO)**

A.4.b - Listing "all creators" might be difficult or impossible for collectively improvised works or some other types of music outside the "classical" idiom.

**RESPONSE TO COMMENT 29:** A group of creators may be administrated by the system using only one Interested Party code for several creators of the same category of role. Additional detailed rules on this issue will be maintained in the Agency Manual.

**A.5 ISWC databases****[30] Canada (SCC)**

The proposal to have separate databases maintained by the local and the International ISWC Music Agencies seems to bear potential for confusion. It would be helpful to have more detail, particularly about how it will be established that a musical work has or will be used internationally and about who will ensure that its ISWC information is entered in the international database in this situation.

**RESPONSE TO COMMENT 30:**

- Rules must be flexible to allow specific management of local and international repertoires.
- Tests are in progress to use Network Computing and Global Data Management System facilities to enable technical solutions to enforce the international administration of the system, such as:
  - Automatic “push” and “pull” of information between local Agencies and the international agency.
  - Use of common “search engine” to retrieve any ISWC data on the request of the members of the ISWC network without caring about where the data is located

**[31] U.S.A. (ANSI/NISO)**

COMMENT re preservation of a master database:

Multiple ISWC agencies might have a record of allocation and supporting data for the same items. However, at least one agency should have principal responsibility for preserving at least one copy of the official record of allocation and supporting data. That one agency may or may not be the International ISWC Music Agency or could even be another national or international institution with expertise and experience such as a national library or national archive.

**RESPONSE TO COMMENT 31:**

- See response to comment 30
- The aim is to maintain progressively a Master database at the International Agency level with automated links to local complementary information maintained in local Agencies. The exchange of information between local Agencies and National institutions such as a national library or a national archive is a matter of co-operation at the local level.

## **Annex B Calculation of the check digit**

### **[32] Czech Republic (CSNI)**

We would say that the example does not present a calculation of the check digit but only the confirmation of it. But how really the check digit can be calculated?

Second paragraph, second sentence: What is done in the case that the sum of the products is not divisible without remainder by 10?

**RESPONSE TO COMMENT 32:**

First comment: agreed. The previous text of this annex will be changed after the second paragraph and will be replaced by:

### **Calculation of the value of the check digit**

$d_i$  : one of the nine digits of the work identifier ( $i=1$  to 9).

$w_i$  : weight of digit  $d_i$ .

$d_c$  : check digit.

Calculation of the sum of the products :

$$\text{sumprod} = 1 + \sum_{i=1}^{i=9} d_i w_i$$

Calculation of the remainder of the division by 10 :

$$\text{rem} = \text{sumprod} - 10 \times \text{Int}\left(\frac{\text{sumprod}}{10}\right)$$

Int is the function that removes the fractional part of its argument.

For example,  $\text{Int}(3,4) = 3$

Calculation of the check digit :

If rem = 0 then

$d_c = 0$

else

$d_c = 10 - \text{rem}$

end if

Example :

<b>ISWC</b>	T	0	3	4	5	2	4	6	8	0	1	
<b>Weight</b>	1	1	2	3	4	5	6	7	8	9	1	
<b>Product</b>	1	+0	+6	+12	+20	+10	+24	+42	+64	+0	+1	=180

$\text{sumprod} = 179$

$\text{rem} = 179 - 10 \times 17 = 9$

$d_c = 10 - \text{rem} = 1$

As 180 can be divided by 10 without remainder, T-034.524.680-1 is a valid ISWC.

Second comment : agreed. We will delete in the 2<sup>nd</sup> paragraph, 3<sup>rd</sup> line “without reminder”.

## Annex C. ISWC supporting data for musical works

### [33] Denmark (DS)

RE Annex C in general. It is difficult to foresee if the format is sufficient for the information needed, or maybe superfluous? Is it based on a practical project?

**RESPONSE TO COMMENT 33:** The informative description of the format for supporting data is based on the experience coming from a practical project in progress. Despite few amendments on specific types of title, types of role or types of work still under discussion, the format gives global satisfaction to potential users of the system and is considered to be sufficient for the information needed.

### [34] France (AFNOR)

We recommend to check the consistency of the requirements given in annex C with the set of directives and recommendations used by the international bodies having competence in the domain of handling the musical documentation (IAML International association of music libraries, archives and documentation centers) on behalf of IFLA.

Are specially concerned the musical uniform titles (i.e. determination and formalization of an unique title for each musical work) as well as the definition of the different types of modification of a work and its title and their implication on the choice of attached intellectual responsibilities.

#### ORIGINAL COMMENTS IN FRENCH

Nous préconisons de bien veiller à la cohérence des instructions données dans l'annexe C avec l'ensemble des directives et recommandations émanant des instances internationales compétentes en matière de traitement de la documentation musicale (IAML International association of music libraries, archives and documentation centers), par délégation de l'IFLA.

Celles-ci concernent notamment l'élaboration des "titres uniformes musicaux" (Musical uniform titles) c'est-à-dire la détermination et la formalisation d'un titre unique pour chaque oeuvre musicale ainsi que la définition des divers types de modification d'une oeuvre et de son titre et leur implication sur le choix des responsabilités intellectuelles attachées.

**RESPONSE TO COMMENT 34:** This checking is in progress. It is suggested that a person representing IFLA and IAML could liaise specifically with the SC 9/WG 2 in order to provide detailed and precised requirements to be taken into account by the ISWC community.

**[35] Sweden (SIS)**

Annex C: We feel that there should be an effort made to make the codes more useable in music libraries. Perhaps that wouldn't be so difficult. (To prepare for a situation, where only one code could be given for use both by libraries and right holders).

To propose one more format for catalogue registers in music libraries is not nice as there are already too many. The format proposed in Annex C seems in some cases to be more difficult to use than e.g. US-MARC and in other cases less reliable.

**RESPONSE TO COMMENT 35:** Efforts may be made via a liaison between the WG 2 and IFLA. see response to comment 34.

**C.1****[36] U.S.A. (ANSI/NISO)**

Annex C.1: The sentence "These supporting data are subject to change at the discretion of the International ISWC Agency" is troublesome and could cause jurisdictional problems especially if decisions of the International ISWC Agency are allowed to override those of a National Agency. The standard should address this issue even if it is a matter of administration.

**RESPONSE TO COMMENT 36:** In the spirit, changes concerned by this sentence should be those mentioned in response to comment 33. The process of agreeing on future changes will be based on consultation with representatives of local Agencies and the aim of the changes will be for the benefits of all the users of the ISWC system. If another wording of this sentence is useful for jurisdictional reasons, SC 9 and the SC 9 Secretariat are free to propose another wording.

**C.2 Title information****[37] Denmark (DS)**

RE C. 2 Title information. There are other types of title e.g. refrain, chorus.

**RESPONSE TO COMMENT 37:** Our understanding is that a refrain and a chorus refer to a possible part of a musical work and this is not the intend of the ISWC project to address this level of identification.

**[38] U.S.A. (ANSI/NISO)**

The definition of "formal title" seems unduly restricted to "classical works." Works in other idioms can also have these "standardized" titles.



**RESPONSE TO COMMENT 38:** Agreed. The text will be changed into “order, such as titles created for classical works”.

### C.3 Information on creator(s)

#### [39] U.S.A. (ANSI/NISO)

The distinction between Composer and Composer/Author is not clear. Furthermore, the notion of Sub Author is not clear. The status of Author, even Sub Author, should not be assigned to one who merely modifies the text. Perhaps the term Editor would be more appropriate.

Consider including Improvisor (as in recording of improvised or extemporaneous music sessions, perhaps even some now occurring in real time over the Internet). It could be mixed with Arranger to create Arranger/Improviser but this combination could be too limiting as the technology of musical creation evolves.

**RESPONSE TO COMMENT 39:** This comment will be taken into account in the on-going process to review and improve the wording of the definition and codification of roles.

However:

- a composer/author is understood by the creator of both music and text.
- the proposal of Editor for a modifier of text is more confusing than the previous proposal as “Editor” may be misunderstood with “publisher” in an international environment.
- the concept of improviser is not used as a distinguishing role in the right management environment.

### C.4.1 Work derivation information: Type

#### [40] U.S.A. (ANSI/NISO)

COMMENT on types and codes:

Do not assign a value to “blank” as is the case of Composite Type and Excerpt Type in the table in C.4.1. If what is intended in this table is to allow for all possibilities, it is less confusing to leave these two entries out of the table.

#### [41] Other comments received

The term “Potpourri” is deprecated. Could a more suitable term be found? [*Informal comment from a member of IAML*]

**RESPONSE TO COMMENT 40 & 41:** These comments will be taken into account in the on-going process to review and improve the wording of the definition and codification

of work derivation. See general response to comments on the Annex C at the end of this document.

## C.4.2 Information on the source work(s)

### [42] U.S.A. (ANSI/NISO)

COMMENT on data processing implications:

Although this standard does not address the data processing implementation of the standard, the sentence "Where no ISWC exists for a source work, its title shall be recorded instead" is troublesome. One of the goals of data processing is the reduction of ambiguity and it is a mistake to use the same field for two kinds of data elements, either an ISWC or a title in the absence of an ISWC. It is not clear that this paragraph of the standard implies this mixed use but some clarity would be useful to suggest that administratively in the absence of an ISWC, the title is recorded but in the place where the titles are ordinarily recorded in the host data base system. Without this clarity, institutions might be led to mix these two data elements in their database systems.

**RESPONSE TO COMMENT 42:** The text will be changed into "the 1st title shall be recorded in a specific field of the supporting data format". This will reflect the way it has been already technically implemented.

## **GENERAL RESPONSE TO VARIOUS COMMENTS ON ANNEX E (INFORMATIVE)**

There are still discussions in progress in CISAC to improve the detailed definition and codification of few specific types of titles, types of roles and types of work derivations. A revised version of the project, including these detailed improvements will be ready at the DIS stage. (minor changes)