

**ISO/TC 46/SC 9 Secretariat**

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ISO/TC 46/SC 9 N 255

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To: P- and O-members of ISO/TC 46/SC 9
International ISRC Agency (IFPI)
Selected liaison organizations

cc. C. Deschamps, ISO/TC46/SC9 Chairperson
S. Clivio, ISO Central Secretariat

SUBJECT: Table of replies and responses to comments on the first ISO Committee Draft 3901, "Information and documentation -- International Standard Recording Code (ISRC)"

The attached document shows the results of voting and comments on the first Committee Draft (TC 46/SC9 N 178) for the revision of ISO 3901:1986 concerning the International Standard Recording Code. The project editor's response to those comments as well as additional changes to the first CD 3901 are outlined in the attached document.

ACTION REQUIRED: For information in reviewing the second CD 3901. Votes on comments on the second CD 3901 are due April 9, 1999.

DISTRIBUTION: To accompany the second CD 3901 (ISO/TC46/SC9 N 257).

This document and a copy of CD 3901 are also available on the ISO/TC 46/SC 9 Web site at:
<<http://www.nlc-bnc.ca/iso/tc46sc9/3901.htm>>.

The project editor for CD 3901 is the ISO/TC 46/SC 9 Secretary in consultation with the International Federation of the Phonographic Industry which is the Registration Authority for ISO 3901.

With regards,

Jane Thacker
Secretary, ISO/TC 46/SC 9

RESULTS OF VOTING ON ISO/CD 3901 (first CD)

Committee Draft 3901, *Information and documentation - International standard recording code (ISRC)*. [Distributed as document ISO/TC46/SC9 N 178]

P-Members of ISO/TC46/SC9	Approve	Disapprove	Abstain	Comments
Australia	[not a P-member at time of vote]			
Canada	X			
China, P.R.				
Czech Republic				
Denmark	X			
Finland	X			X
France	X			X
Germany	X			
Hungary	X			
Iran	[not a P-member at time of vote]			
Italy	X			
Japan	X			
Norway	X			X
Poland	X			X
Portugal				
Russian Federation	X			
South Africa	X			
Spain	X			
Sweden			X	Abstains from future work on this project
U.K.				
U.S.A.	X			
TOTAL	14	0	1	
Additional comments received from: IFPI (the Registration Authority for ISO 3901).				

**Project editor's response to
comments on the first Committee Draft 3901 (TC 46/SC 9 N 178)
International standard recording code (ISRC)**

GENERAL COMMENTS

Finland (SFS)

General (cf also 1 Scope and 3.4 Definitions):

If the ISRC is used for other than music sound recordings, the relations between ISRC and the other standard numbers, especially ISBN and ISMN, should be mentioned in the standard. Some sound recordings (e.g. books on cassettes) and educational videos are included in the ISBN system (see ISO 2108-1992). Should/could these documents carry both an ISRC (as the identification of the recording) and an ISBN (as the identification of the publication)?

Are recordings in electronic forms included in the scope of the standard?

Response: The ISRC system applies to “audio recordings and music video recordings”. The second paragraph of the scope has been amended to clarify the extent of the ISRC system and that it applies to both analogue and digital recordings.

For producers of spoken word recordings, the choice of whether to use the ISBN or ISRC system will be based on both the nature of the product and on their business and distribution requirements. There is no restriction on registering a specific recording with both the ISBN and ISRC systems, if the item is appropriate to both systems. The difference to note, however, between the ISBN and ISRC systems is that an ISBN is assigned to a specific physical format whereas an ISRC is assigned to a specific recording, regardless of format. For example, the hardcover and paperback editions of a book would have different ISBN but when an individual recording is reused without change on a new album of recordings, its ISRC would remain the same.

France (AFNOR)

Une fois rappelée la réserve générale sur la structure alphanumérique de ce code qui pose plus de problèmes à l'usage (gestion informatique, représentation sous forme de codes-barre...) qu'un code strictement numérique de type ISBN, la seule question qui se pose est la suivante:

en cas de réédition d'une partie seulement d'un enregistrement (air d'opéra par exemple dont les interprètes peuvent être particuliers) reprend-on l'ISRC de l'enregistrement complet initial?

[English translation:

Recalling our general concern that the alphanumeric structure of this code poses more problems for use (information management, representation in the form of bar codes...) than a strictly numeric code of the ISBN type, the only question that must be asked is the following:

in the case of reissue of only a part of a recording (for example an operatic aria in which the performers could be exceptional) does one again use the ISRC of the initial complete recording?]

Response: See clause 4.4 (“Recording code”) in N 178. The main reason for revising ISO 3901 was to delete the specifications for an ISRC at the album level. ISRC were not feasible for albums because they could not be encoded into the work and were therefore of no practical use for the recording industry. ISRC identify recordings not the products (e.g. CD albums) on which they are released.

An ISRC is assigned to specific individual recordings, as determined by the producer who is responsible for encoding the ISRC into the master recording. Whenever there is the intention to administer rights to the recording as a separate entity, it is assigned its own ISRC.

The ISRC “*Practical Guide*” issued by the Registration Authority explains this further. A new ISRC is given to each re-mix, edit or new version of a recording. When previously released recordings are used in their entirety, the original ISRCs is used. However, when previously released recordings are used partially, i.e. faded in or out, a new ISRC is assigned, if the duration of the change in playing time exceeds the recommended threshold of 10 seconds. These details are more suited to the *Practical Guide* than to the International Standard.

Sweden (SIS)

After consulting with the Swedish IFPI-representative we have decided to vote abstention on CD 3901. In the future work with ISO 3901 Sweden wants to be considered a non participating member.

The Swedish IFPI representative has no objections to the contents of CD 3901 but see no point in paying the national standard organization to handle the proposal in the preparatory stage as it can easily be done through international IFPI alone since the recording industry is the only user of this standard.

In light of the above we think it would be wise to carefully look at the scope of ISO/TC 46/SC 9 and for the future decide what really shall be of concern to the committee, taking into account also the main interests of the SC 9 participants.

Response: For the past several years SC9 has been discussing ways to make its work more relevant to information producers. The suggestion that the recording industry, a major information producer, should be excluded from the scope of TC 46/SC 9 is puzzling.

Furthermore, recording producers are not the only users of the ISRC. The ISRC should be of interest to any organization involved in the administration of rights to a recording. As such it will

affect: broadcasters, manufacturers of recording formats and playback devices, copyright collectives, etc.

TITLE

Norway (NF)

International sound recording code (ISRC)

Response: A change in the name of the ISRC is not desirable because it would adversely affect the Registration Authority which has already made substantial investments in promoting the ISRC under the name “International Standard Recording Code”. Furthermore, the ISRC system is not limited solely to sound recordings, as it does include certain audiovisual recordings (i.e. music videorecordings).

4.2 FIRST OWNER CODE

Poland (PKNMiJ)

A combination of (any?) alphanumeric characters (A to Z and 0 to 9) may provide a coding capacity of 28,080 only if entirely numeric or entirely alphabetic strings are excluded otherwise the coding capacity is 46,656 if 000 string is excluded.

In this connection, the first sentence should be reworded:

"The first owner shall consist of a combination of alphanumeric characters, A to Z and 0 to 9, that contains at least one letter and one number."

Response: The incorrect reference to coding capacity has been removed. However, entirely numeric or alphabetic strings may be needed in the future so that possibility has not been excluded.

4.4 RECORDING CODE

IFPI (Registration Authority)

This letter is to inform you that a slight amendment to the ISRC standard was requested by our industry recently. This amendment consists of naming the last sequence of 5 digits the “*designation code*” previously the “recording code”. ... [Enclosed is] the new edition of the *Practical Guide* includes the above amendment and other changes in chapter 6 relating to the technical details for encoding the ISRCs, even though this last chapter is not part of the standard itself. [letter from IFPI, 3 March 1994]

Response: Done. The sequence of digits formerly called the “recording code” element has been replaced by “*designation code*” throughout the text.

ANNEX A.1 (General principles for the allocation of ISRC)**Finland (SFS)**

page 5: The ISRC should be included in all relevant documentation concerning a recording. Add:

"It shall also be given in an eye-readable form on the recording and on its carrier."
(cf. ISO 2108-1992, clause 4.2)

Response: See new clause A.3 (Fixation of ISRC). It is not possible to require that the ISRC be given in eye-readable form on the carrier or recording. Since the ISRC applies to each separate recording, there would be no room on the label of an album or CD for the producer to list all ISRC contained on that carrier. The key requirement is that the ISRC shall be encoded in digital recordings so that it is a permanent part of the digital recording regardless of any subsequent changes in its carrier.

ANNEX A.3.2 (now A.5.2) National ISRC Agencies**IFPI (Registration Authority)**

The listings do not need to be sorted by country code; therefore I suggest the following in the last paragraph of this section A.3.2:

"arranged by first owner codes as well as by the corporate name/name of the first owners".

Response: Agreed because database technologies automatically provide this kind of sorting. The text was changed to: *"The data should be maintained in such a way that it can be searched and displayed in alphabetical order by registrant codes and by the names of the registrants."*

Would like to add at the end of this section:

"These listings have to be transmitted once a year to the International ISRC Agency, which can then ensure a consistent implementation of the code worldwide."

Response: Done. Text was changed to: "The ISRC agencies should transmit a current copy of their directories of registrant codes to the International ISRC Agency once a year."

ANNEX A.3.3 First Owners (now A.5.3 Registrants)**IFPI (Registration Authority)**

At the end of this section, suggest adding the following:

"A format for this exchange of information between the producers and the ISRC National Agencies is available from the International ISRC Agency, and is also included in chart

form on pages 6 and 7 of the Practical Guide. Note that a strict adherence to the format allows the exchange of information by electronic means."

Response: Added as follows: *"A specified format for the exchange of ISRC information between registrants and the ISRC agencies is available from the International ISRC Agency. Strict adherence to the format specified by the International ISRC Agency will permit the exchange of information by electronic means."*

OTHER CHANGES INTRODUCED BY THE PROJECT EDITOR/SECRETARIAT:

The following changes were introduced by the Secretariat following discussion of the draft at the April 1998 meeting of ISRC national agencies in London:

- at clause 2, a reference to the draft ISAN standard (CD 15706) was added
- throughout the draft the term "first owner" was changed to "*registrant*" in order to avoid implying that the assignment of an ISRC is evidence of the ownership of rights in a recording
- at clause 3.1, the definition of "country code" was changed from "Code that identifies the country of residence of the first owner of the recording" to "*Code that identifies the country of residence of the registrant for the audio recording or music video recording at the time the ISRC is allocated.*"
- at clause 3.3, a definition of "music videorecording" was added after discussion between the ISRC Registration Authority and the ISAN Working Group at its December 1997 meeting in London, as follows:

*"music videorecording: Audiovisual fixation of which the audio component consists wholly or substantially of a recording of a performance of a musical work or works.
NOTE - In most cases, such audio component is also available as a separately released sound recording."*
- at clause 3.4 (formerly 3.3) the term and definition were changed from: "first owner: Producer of the recording" to: "*registrant: Original producer or subsequent owner of the audio recording or music video recording at the time the ISRC is assigned.*"
- at 4.1 (Country code), the words "*at the time the ISRC is assigned*" were added to the end of the first sentence.
- at 4.2 (Registrant code), the wording of the first sentence was made more specific by adding that the registrant code identifies the producer or subsequent owner *at the time the ISRC was allocated to the recording.*
- at 4.2, the example has been updated. The registrant code Z03 indicates "Mercury France".
- at 4.3 (Year of reference), the element "Year of recording" was changed to "*Year of reference*" in order to make the determination of this element simpler and more standard. There were sometimes difficulties in determining when the recording process was completed (particularly for backstock). In other cases, there were different interpretations as to what

constituted the completion of a recording process. By changing this element to the year in which the ISRC is assigned, there is only one possible value for this element.

- at 4.3 (Year of reference), the details regarding the year element for reissues of recordings prior to 1940 were moved to the *ISRC Practical Guide*.
- at 4.3 (Year of reference), another example was added (“01=2001”) to demonstrate that the years 2000+ are still recorded with two digits, in spite of Y2K problems elsewhere. For the ISRC, a “Y2K” problem will not occur until 2040 because of an early policy of the ISRC system which prohibited the use of any year prior to 1940 in this element of the ISRC. In the meantime, the ISRC agencies are working on ways to handle the “Y2K” problem for ISRC well in advance of the year 2040. This matter will be addressed in a future edition of ISO 3901.
- at 4.4 (Designation code), further details were added to clarify how separate units are determined.
- Annex A: the sub-clauses were numbered in accordance with ISO’s editing directives.
- Annex A.1.2: the specification concerning the point at which an ISRC is to be assigned was repeated here, as it is a general principle for the allocation of ISRC
- Annex A.1: the former paragraph concerning use of “classification systems” was deleted because experience showed that users found this section confusing. Since in-house systems are already covered by clause A.1.7, the paragraph was deleted.
- the last paragraph of A.1 was moved to the new section A.3 on “Fixation of ISRC”
- Clause A.1.9 was added to make it clear that the assignment of an ISRC is not related to registration of copyright.
- Annex A.1.7: the specification that “Designation codes should be assigned sequentially” was repeated here because it is the recommended method of assignment. A sentence was added to specify that changes to any in-house systems shall not affect the ISRC once it is assigned.
- Annex A.2 (Modified versions): This section was added to cover the assignment of ISRC for modified versions, based on the specifications in the *ISRC Practical Guide*.
- Annex A.3 (Fixation of ISRC): This section was added to cover the encoding and display of ISRC on recordings.
- at A.4 (Application of ISRC), examples 1 and 2 were updated. The remaining examples were deleted as they were redundant.
- at A.5.1 on “Administration” (formerly A.3.1), a new paragraph was added to state that, in the absence of a national ISRC agency for a specific region, the International ISRC Agency may administer ISRC for that area.