To: Joint Steering Committee for Development of RDA

From: JSC Working Group on Fictitious Entities

Subject: Fictitious and other entities in RDA and the consolidated FR models

1. Background

The Joint Steering Committee for RDA constituted a Working Group in Spring 2015, to consider how fictitious, pseudonymous and non-human entities could be incorporated into the FR consolidated models being developed by IFLA. Here are our preliminary comments.

2. Summary

- This WG agrees with the aims behind the consolidated FR models, and the need for interoperability with CIDOC and other communities.
- A consolidated FR model should where possible consolidate the definitions in the existing FR models, and in particular, the FRAD definition of Person, which is central to RDA cataloguing practice.
- JSC might explore whether the greater flexibility allowed by the FRAD definition could also benefit CIDOC and other constituencies.
- This WG commends the principle in IFLA's *Statement of International Cataloguing Principles*, that "Description and controlled terms of names should be based on the way an entity describes itself." ¹

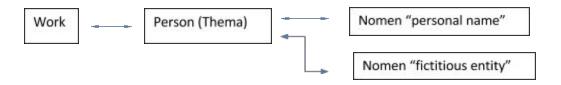
3. Personal Names

3.1 General Comments on Personal Names

In striving to reconcile FRBR, FRAD and FRSAD, while achieving wider compatibility with CIDOC-CRM, IFLA has proposed models in which only real humans can be "persons", due to a particular view of the Theory of Mind. Nomens of fictitious and non-human persons described as agents can therefore only be Nomens of real persons:

Statement of International Cataloguing Principles, IFLA, 2009, p.1 http://www.ifla.org/files/assets/cataloguing/icp/icp 2009-en.pdf

² https://en.wikipedia.org/wiki/Theory of mind

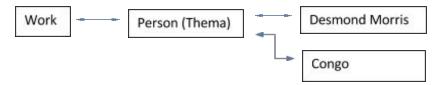


To use a real-world example:



A pseudonym, correspondingly, would be a Nomen subsumed under the Thema of the "real" author.

Nomens of non-human entities would be Nomens of associated human beings. For example, Congo was a chimpanzee encouraged to paint by Desmond Morris. Under the FRBRoo definition. Congo cannot be an agent; therefore, he must be subsumed under the Thema of a "real" person:



The WG generally supports the models being developed by IFLA. But we have concerns about the application of the model for both non-human and fictitious entities as creators.

Cataloguers have always used the resource itself as the source of bibliographic data. RDA expanded this greatly by making "take what you see" an underlying principle of resource description. Allowing fictitious and non-human entities as creators has been a welcome introduction, particularly in the area of patron convenience, and the general confusion between pseudonymous and fictitious authors was rendered moot. AACR2 permitted Lemony Snicket to be an author/creator, but denied the same status to Geronimo Stilton. This was not an arcane point; children's librarians noted that their small patrons came to the library seeking "books by Geronimo Stilton." The ability to have him, finally, as an access point served their users' abilities to find, select, and obtain their needed resource. To walk back these changes would needlessly complicate bibliographic description and be detrimental to users.

The convenience of the user, since the time of Ranganathan, has been of paramount importance. The IFLA *Statement of International Cataloguing Principles* says: "Decisions taken in the making of

descriptions and controlled forms of names for access should be made with the user in mind... [and, from the introductory paragraph] The highest [principle] is the convenience of the user." To the WG, this means that the model must serve the convenience of the user. "Users" encompass a wide range of people from the highest level cataloguers at national libraries to the smallest of patrons entering their school or public library. A kindergartner should be able to go into her library and find all books written by Geronimo Stilton, just as an adult reader should be able to find books by Richard Castle, Hyacinth Bucket, or any other purported author, real or not.

A second point addressed in the IFLA statement is representation. "Description and controlled terms of names should be based on the way an entity describes itself." If a work purports to be by an entity, it should be described that way, whether the entity is known to be "real" or not. Attempting to decide as a matter of fact whether persons are real, or whether non-human persons can be agents, leads us into unnecessary difficulty.

Which persons are "real" persons? Sherlock Holmes doesn't exist, but neither do deceased persons. Sherlock Holmes is invented; is Jesus Christ invented? William Shakespeare? The angel Jibril revealed the Quran to Muhammad – are angels real? Odin is a Norse god, still worshipped. Does he exist? Is a non-human animal attributed as a creator or a contributor conscious? If a non-human animal is conscious, does it have the kind of consciousness that would enable us to regard it as a creator? If I put paper in front of a chimpanzee and invite it to make marks with a paint brush (as Desmond Morris did in 1960), are the results the work of the chimp or of Desmond Morris? Early hominins created tools and art works; it might be possible to attribute these to specific individuals, even if we don't know what they were called. If they are not the creators of these things, then who is? The paleontologist?

It is unnecessary to resolve these arguments in order to record metadata about these entities. We can bring out their relationships to resources, and to each other, as is helpful and appropriate. For example, whether or not non-humans are capable of independent action, thought, or creative abilities is an unsettled philosophical question, but it is irrelevant for the task at hand. The principle of representation requires that we accord creators that role if they are presented as such in the bibliographic resource.

3.2 FRBRoo

One source of the problems we have been discussing is the current definition of "person" in FRBRoo, which draws heavily on the narrow definition in CIDOC-CRM. Following the FRAD definition of "person" to allow bibliographic identities that are non-human, fictitious, pseudonymous, or legendary would solve the conundrum of how to represent these entities within the model, without damage to it, to bring greater consistency not only with existing FR models, but with RDA and the way we now record metadata about persons and their relation to resources. But FRBRoo says:

³ Statement of International Cataloguing Principles, IFLA, 2009, p.1 http://www.ifla.org/files/assets/cataloguing/icp/icp 2009-en.pdf

The FRBRoo model clarifies that multiple bibliographic identities (such as pseudonyms coexisting with real names in different publications) are to be understood as instances of multiple name use by a single F10 Person in different contexts. This permits a new interpretation of the FRAD Person (An individual or a persona or identity established or adopted by an individual or group) as different instances of F52 Name Use Activity of the same person taking place in specific contexts (R61).⁴

Unfortunately this is not a "new interpretation" of the FRAD "Person", but a completely different, and much narrower definition. In FRAD a person is a bibliographic entity (RDA: "An individual or an identity established by an individual"). So whereas variations of a person's real name, not intended to indicate separate identities, are Nomens of the "real" person, pseudonyms are Nomens not of the "real" person, but of *distinct* bibliographic entities, that are related to the "real" person. Thus we record data concerning persons *purported* to exist, rather than persons we believe really existed. This applies whether the person is real, pseudonymous, fictitious or non-human. But FRBRoo defines F10 Person more narrowly:

Scope note: This class comprises real persons who live or are assumed to have lived. Bibliographic identities or personae assumed by an individual or a group should be modelled as F12 Nomen and connected to the relevant person or group with an instance of F35 Nomen Use Statement;

F12 Nomen is defined as;

Scope note: This class comprises any sign or arrangements of signs following a specific syntax (sequences of alphanumeric characters, chemical structure symbols, sound symbols, ideograms etc.) that are used or can be used to refer to and identify a specific instance of some class or category within a certain context.⁵

Nomens include not only pseudonyms, but also real names used by persons as bibliographic identities. However, the meaningful distinction is between persons and their Nomens, not between real persons and supposedly unreal persons.

"Assumed to have lived" is also somewhat subjective. Assumed by whom? We should be providing access to resources via Nomens of authors that our users may "assume" have written them, be they Terry Pratchett or Hyacinth Bucket.

FRBRoo makes no mention of non-human entities, but classes fictitious entities as F38 Character:

Scope note: This class comprises fictional or iconographic individuals or groups of individual appearing in works in a way relevant as subjects. Characters may be purely fictitious or based on real persons or groups, but as characters they may exhibit properties that would be inconsistent with a real person or group. Rather than merging characters with real persons, they should be described as disjoint, but related entities. ⁶

⁴ FRBR object-oriented definition and mapping from FRBR ER, FRAD and FRSAD (version 2.2) p. 19 http://www.ifla.org/files/assets/cataloguing/frbr/frbroo v2.2.pdf

⁵ FRBR object-oriented definition and mapping from FRBR ER, FRAD and FRSAD (version 2.2) pp. 49-50 http://www.ifla.org/files/assets/cataloguing/frbr/frbroo v2.2.pdf

⁶ FRBR object-oriented definition and mapping from FRBR ER, FRAD and FRSAD (version 2.2) p. 63 http://www.ifla.org/files/assets/cataloguing/frbr/frbroo_v2.2.pdf

An entity is treated differently by the model, depending on whether it is presented as a subject or as an agent. For example, Congo the chimpanzee as the subject of this sentence, and as the creator of a painting, are not two different entities, but the same entity. It's unnecessarily complex to claim that in one case the Nomen "Congo" refers to a chimpanzee, and in the other it is a Nomen (pseudonym) of Desmond Morris. Morris clearly had a role in the creation of Congo's works, but we deny what is presented to us, if we say that Congo did not. It may be appropriate to record a relationship between Morris and Congo, but to say that Morris created the art works using Congo as an instrument is to make an unnecessary (and highly disputable) subjective judgement. This hubristic view of creation also disregards many things that may be of interest to the museum and scientific communities, that are created by non-humans without human mediation.

FRBRoo gives the following examples of Nomens and the entities to which they refer:

Du Fu [is a Nomen of an 8th century Chinese poet called Du Fu] Université de Sfax' [is a Nomen of a University called Université de Sfax'] Murders in the Rue Morgue [is a Nomen of the work called Murders in the Rue Morgue]

It is entirely consistent to say:

Congo [is a Nomen of a chimpanzee named Congo] rather than
Congo [is a Nomen of Desmond Morris]

We need to record exactly the same metadata in respect of Congo, as for any human creator. RDA treats Congo as Person, which could be redefined in FRBRoo terms as:

Scope note: This class comprises individuals who are *presented* as having lived. Bibliographic identities or personae assumed by an individual or a group should be modelled as F12 Nomen and connected to the relevant person or group with an instance of F35 Nomen Use Statement.

If a chimpanzee artist has a relationship to a human person, that relationship can be recorded. It's a stretch too far, to claim that a Nomen of a chimpanzee (or an unknown prehistoric artist) has to be a Nomen of a different, "real" human.

RDA does not, and need not treat these entities, or pseudonymous entities, in that way. FRBRoo 1.3 says its proposal is "simpler than defining personas as classes within the model, as well as being considerably more flexible", but we don't agree. We don't have to define "personas", we can simply clarify F10 Person to match FRAD and RDA. A consolidated FR model should consolidate the FR models.

⁷ https://en.wikipedia.org/wiki/Congo_(chimpanzee)

⁸ https://en.wikipedia.org/wiki/Bowerbird http://www.npr.org/2011/12/04/143064682/name-that-tune-identifying-whale-songs-for-science

In RDA, real, pseudonymous, fictitious and non-human persons are treated as bibliographic individuals in their own right. This data structure works for all types of individual, and their Nomens. It has ample flexibility: it's perfectly viable and doesn't require judgements over whether a person has lived, or is assumed to have lived, or engage in religious dispute or speculation about other minds. We should record metadata that reflects the way the world appears, not seeking to ascertain "truth," because that truth can often not be ascertained, and is not essential to resource discovery.

3.3 FRBR-LRM

At the time of writing, FRBR-LRM is under development, and only an introductory document is available. The WG supports much of the model, while noting that there is no self-evident place for assumed identities (pseudonyms), fictitious persons, legendary persons, non-human animals, etc.

In FRBR-LRM, Person is a subclass of Agent. Under the proposed definition, the entities under discussion are excluded from being Persons:

Agent: An entity capable of exercising responsibility relationships relating to works, expressions, manifestations or items.

Person: An individual human being

We considered three possible ways to accommodate assumed identities (pseudonyms), fictitious persons, legendary persons, non-human animals, etc., in the model:

- 1. As Nomens of other entities;
- 2. As subtypes of the kinds of res (thing) that can serve as Subjects;
- 3. As sub-classes of Person.

In turn:

1. As Nomens of other entities.

In FRBR-LRM, a Nomen is *Any sign or arrangement of signs by which an entity is known*. The only entity listed in Table 2 of which the Nomens in question could be Nomens is Person. Person is defined as an individual human, so Nomens purportedly of fictitious persons, legendary persons, and non-human animals could not be Nomens of what they claim; they would in reality be Nomens of real humans.

It is possible to conceive of assumed identities in this way. A pseudonym adopted by an author could be a Nomen of the "real" author (as FRBRoo suggests; see discussion above). But this is not the way in which the information is presented, and becomes less sustainable for joint, multiple and house

⁹ Introducing the FRBR Library Reference Model http://library.ifla.org/1084/1/207-riva-en.pdf

pseudonyms, or for cases where the "real" author is not known. Furthermore, assumed identities are also often fictitious characters in their own right, and while it might be tenable to conceive of Alexander Kent as a Nomen of Douglas Reeman, it is less comfortable to say that Charlie Small (a fictional eight year old boy and purported author) is a Nomen of the author Nick Ward, or that Geronimo Stilton (a fictitious mouse author) is a Nomen of real person(s) unknown. And we don't think this is tenable for legendary characters, angels, dolphins and the like. In RDA, in our authority data, and in users' expectations, these are all Nomens of the entities of which they purport to be Nomens.

2. As subjects

In FRBR-LRM:

The entities from FRBR group 3 (concept, object, event, place), as entities that serve as objects of the subject relationship, are considered deprecated in the consolidated model. This means that they have no official standing in the model, but that if considered useful in a given application they can be used to sub-type the kinds of res that can serve as subjects.

It might be possible to create our entities as "kinds of res that can serve as subjects" (with or without creating a new superclass for them), and add them to the model. There are two problems with this.

Firstly, it doesn't work for assumed identities (pseudonyms), which are presented as *agents*, and as we have seen, overlap with the other kinds of entities we are considering.

Secondly, *all* these entities are frequently presented as agents, that is, as creators of and contributors to works. As has been discussed, it is not accurate and often not possible to treat them as Nomens of real persons, nor would this treatment meet user expectations (which is why FRAD doesn't do this). While these entities can certainly serve as Subjects, that cannot be the whole story.

3. As sub-classes of Person.

We have previously discussed the problems that occur when we try to decide whether a person is "real", or if it is real, whether it is conscious, or if it is conscious, what kind of consciousness is necessary for it to be considered an agent. An unnecessarily narrow definition of Person leaves nowhere for the entities that fail this test. However, if we describe what is presented to us, these problems do not arise.

Firstly, the definition of Agent could be revised to say: "An entity *presented* as exercising responsibility relationships relating to works, expressions, manifestations or items."

As currently drafted, FRBR-LRM's definition reflects CIDOC CRM's narrow conception of agency. A wider conception is needed to accommodate the way in which entities are presented in relation to bibliographic resources (it is entirely likely that CIDOC would also have use cases that would benefit). Meanwhile, neither FRBR 3.2.5 nor FRAD 3.4 say that Person need be a human being. FRAD (the result of a decade's work by FRANAR) explicitly includes real individuals, pseudonyms, literary figures, legendary figures, named animals and identities established by groups. A consolidated FR model should consolidate the definitions in the existing FR models.

We can define Person as "Person: an individual Agent" (agent being redefined as above).

The question is then whether our entities should be created as sub-classes of Agent, or of Person. In FRBR-LRM:

Any instance of a subclass entity is also an instance of the superclass ... This permits the model to be streamlined and avoid repetition in the attributes and relationships that are defined ... the result of the definition of the superclass entities agent and group is that all the attributes and relationships that would have been defined for family and corporate body are declared at the more general level.

In each case there is a Nomen by which the entity is known, similar authority metadata is recorded, and the entity can be presented as an Agent, or as a Subject. All the attributes and relationships that could be defined for assumed identities, fictitious persons, legendary persons, and non-human animals can be declared at the level of Person, so they are sub-classes of Person.

The WG, however, does wonder whether Agent is a Res at all. Of all the Entities in Table 2, Agent is the only one that describes what an entity *does*, rather than what it is. We believe that Agent is not a Res; rather, both "Agent" and "Subject" express relationships. Any Res that is presented as an Agent or a Subject (not all would be) could be recorded as standing in that relationship. Allowing Person (or better, *Individual*) and Group to stand as direct sub-classes of Res, would be more logical, and would not constrain either what a Person could be, or what kind of Res could be considered a creator.

<u>3.4 ISNI</u>

The WG would like to comment on the fit of our bibliographic approach with data used by other communities. The leading project to combine data to create identifiers for persons is the ISNI (International Standard Name Identifier) database, which combines data from library, publishing, rights management and other communities. ISNI is governed by an international agency comprising Confédération Internationale des Sociétés d'Auteurs et Compositeurs (CISAC), the Conference of European National Librarians (CENL), the International Federation of Reproduction Rights Organisations (IFRRO), the International Performers Database Association (IPDA), the Online Computer Library Center (OCLC) and ProQuest. ISNI has its own International Standard, ISO 27729, which was approved in 2012.

ISNI records data about "parties". A party can be a natural person (a human being) or a legal entity (such as a registered company), but also a fictional, legendary or mythological character (Mickey Mouse, Robin Hood and Hercules have ISNIs). A party can be non-human (Bob, the Railway Dog). ISNI assigns identifiers to the public identities of parties. ISNI is therefore an identifier of the Nomens of Persons in the FRAD and RDA sense. ISNI contributors have differing practices for pseudonyms: some data sources record pseudonyms as separate identities, while others record them as variant or alternative names. In some cases, there is a mixture of approaches. Inconsistencies are resolved manually and by program. But it has been possible to integrate data from different communities, following the ISNI model.

4. Corporate Bodies

The WG also considered how to treat corporate bodies that might be pseudonymous, fictitious, non-human, etc.

Much has been made in discussion of the bodies Thai Elephant Orchestra and The Amazing Acro-Cats, whether they should be considered to be non-human corporate bodies, and if so, to whom their Nomens relate. However, these bodies present no greater problem than any other corporate body that uses performing animals. "Thai Elephant Orchestra" is the Nomen of a corporate body called "Thai Elephant Orchestra". We need to be able to say that a work is created by the Thai Elephant Orchestra, and then stop. It really doesn't matter whether it's created by the elephants, or by people controlling the elephants. Users just want to find a CD by the Thai Elephant Orchestra, by searching the same index that holds the names of other creators. And it is convoluted and unnecessary to conceive of the Amazing Acro-Cats as a Nomen for the trainer Samantha Martin. We don't have to know whether a purported body is real, imaginary, pseudonymous or fictitious (or even non-human), in order to describe it, and its relation to other things.

This WG also supports Adam's Schiff's proposal made to CC:DA¹⁰, to add relationship designators and new text to RDA permitting the notion of pseudonymous (or "alternate") corporate bodies:

In the course of upgrading some records for corporate bodies to RDA, research that I did indicated that, like persons, corporate bodies may also have alternate identities [...] The Wikipedia entry for the rock group R.E.M. stated that it was also known as Bingo Hand Job [...] Subsequent research on pseudonymous corporate bodies that I've done has indicated that the use of pseudonyms for musical groups is not uncommon [...] Based on this information, I contacted John Attig in September 2012 to suggest that two new relationship designators were needed in RDA Appendix K.4.3:

alternate corporate identity A pseudonymous or other identity assumed by the corporate body

real corporate identity A real corporate body that assumes the alternate identity

As we have already argued, in FRAD a person is a bibliographic entity. Exactly the same treatment can be extended to corporate bodies. If we do not concern ourselves whether a purported body is real, imaginary, pseudonymous or fictitious (or even non-human), the perceived problems tend to go away.

Some bodies can be treated as pseudonymous, "alternate" or otherwise related corporate bodies. The relation is between FRBRoo F11 Corporate bodies, each of which has one or more F12 Nomens.

REM is a Nomen of the body known as **REM**.

Bingo Hand Job is a Nomen of the body known as **Bingo Hand Job**.

REM and **Bingo Hand Job** are related bodies (in this case the relationship is pseudonymous).

Compass East Corporation is a Nomen of the body known as Compass East Corporation.

Walt Disney Company is a Nomen of the body known as Walt Disney Company.

Compass East Corporation and Walt Disney Company are related bodies (one was founded by the other, created to buy land for what would become Walt Disney World. This relationship can already be expressed in RDA).

Specific use cases arose in discussion; we discuss them here:

1. What's the difference between a pseudonymous corporate body and a collective pseudonym for two or more authors?

¹⁰ Pseudonymous corporate bodies. http://alcts.ala.org/ccdablog/wp-content/uploads/2013/05/schiff2013-1.pdf

The way we treat the name should depend on whether it conveys the idea of a single person, or of a group of persons working together. What does it purport to be? That's what users will look for.

2. The Crusty Bunkers

Crusty Bunker, or the Crusty Bunkers, was the collective pseudonym of group of comic book inkers, occasionally credited as "Ilya Hunch", "Chuck Bunker", or "The Goon Squad" 11.

"Crusty Bunkers" and "Goon Squad" convey the idea of a group of persons (corporate body). "Ilya Hunch" and "Chuck Bunker" convey the idea of a single person (joint or collective pseudonym). "Crusty Bunker" is ambiguous, but it is something a cataloguer could decide on. Cataloguers need to make similar distinctions between real groups and real individuals that have ambiguous names as well.

There is no reason why personal and corporate names can't be linked in the same set of data.

3. Luther Blisset

Luther Blissett is a multiple-use name, shared by hundreds of artists and activists. 12

The name conveys the idea of a single person. Treat as a pseudonym used by more than one person.

4. Carolyn Keene

Pseudonym of the authors of the Nancy Drew stories ¹³—do they qualify as a corporate body?

The name conveys the idea of a single person. Treat as a pseudonym used by more than one person.

5. Foodles Productions Ltd

"STAR WARS: EPISODE VII has apparently booked stage and facility space at Pinewood Studios just outside of London under a company pseudonym ... "Foodles Productions Ltd." 14

Treat the name as a corporate pseudonym, following Adam Schiff's proposal.

6. Wish Tree Films

"Wish Tree Films is the pseudonym production company name for independent filmmaker Peter Lown." ¹⁵

A person can have a corporate pseudonym, if Adam's proposal is accepted.

7. Normalization

Finally, a question:

https://en.wikipedia.org/wiki/Crusty_Bunkers

¹² https://en.wikipedia.org/wiki/Luther Blissett (nom de plume)

https://en.wikipedia.org/wiki/Carolyn_Keene

¹⁴ http://www.theforce.net/story/movie/Rumor Is Episode VIIs Code Name Foodles Productions Ltd 153515.asp

¹⁵ https://vimeo.com/wishtreefilms

How to normalize Nomens that cross entity types? Should "Jethro Tull (Group)" be normalized to "Tull, Jethro (Musical group)" - why, as a user, do I not find the Group filed beside the Person in most Name indexes? Should Person-type Nomens always be treated as if they name Persons? Should the Nomen "The Amazing Acro-cats" be normalized to "Amazing Acro-cats" and "Acro-cats, The Amazing"? If not, why not? Do we distinguish between "The Amazing Randi" and James Randi (well-known skeptic and magician)?

The entity type to which we assign a name should depend on whether it conveys the idea of a single person, or a group of persons. This determines how it is most likely to be sought. Treat "person-type" Nomens as if they named persons, and "corporate body-type" Nomens as if they named bodies.

Record all the Nomen variants that are found, and likely to be sought. In a system that uses preferred access points, prefer the Nomen by which the entity is commonly known. Our conventions suggest an inverted form for a personal name "Tull, Jethro", and a direct form for a corporate name "Jethro Tull (Group)". In the authority data for the group, record the variant "Tull, Jethro" (which in LC/NAF does, indeed, file immediately before the person).

"The Amazing Acro-Cats" conveys the idea of a corporate body, so record the preferred Nomen in direct order. Following current normalization conventions, we omit the article. An inverted form could be recorded as a variant (though many see this as an archaic practice, harking back to card catalogues).

"The Amazing Randi" and "James Randi" each convey the idea of a single person, and are Nomens used by one person. "Randi, James" is currently the preferred Nomen in LC/NAF, though at one time "Amazing Randi" was preferred. If no preferred Nomen is required, then it doesn't matter.

As with personal names, all these issues are soluble, if we ensure that our model lets us record the world as it is presented to us, rather than as we imagine it to be.

5. Changes to RDA

The changes required to RDA that arise from the approach suggested by this WG are modest:

- The current definition of Person, based on FRAD, would be retained.
- The definitions of families and corporate bodies would be made consistent with the definition of Person, to include pseudonymous, fictitious, non-human (etc.) entities. 16
- Further relationship designators would be defined for these entities (for example *real identity* and *alternate identity* for corporate bodies).

6. Conclusions

This Working Group agrees in principle with the framework presented in both FRBRoo and FRBR-LRM, while emphasising that in order to make the models work for bibliographical description, there must

¹⁶ As proposed in 6JSC/BL/21 http://www.rda-jsc.org/sites/all/files/6JSC-ALA-43 and 6JSC-ALA-43 http://www.rda-jsc.org/sites/all/files/6JSC-ALA-43.

be some redefinition in relation to agents and persons. We are pleased that IFLA has been working with CIDOC and other agencies to make the consolidated model more consistent with non-bibliographic constituencies, but would urge that the flexibility and utility of our current practice not be restrained – this may also benefit **other** constituencies, and this needs to be explored.

Most of the issues discussed in this document stem from a very narrow conception of the entity "person," based upon the stricter definition in CIDOC-CRM. Restricting the definition unnecessarily restrains and complicates the process of providing access and assisting our users with their information needs, which is the first principle that should be guiding our efforts. Adopting a broader definition need not compromise interoperability with CIDOC-CRM.

There are also real, practical issues with reversing course to disallow fictitious and non-human entities as creators, besides the more theoretical ones outlined in this paper. As far as we are aware, NACO is the only application of RDA to authority data – it is RDA's flagship for authority data. Internationally, PCC has taken the RDA conversion of the LC/NAF very seriously. NACO has for some time been moving fictitious and non-human entities wholesale from the LCSH file to LC/NAF, precisely so they can be recorded as creators and contributors. This has created extra work for all NACO participants. Institutions have changed their cataloguing practices and revised much of their bibliographic data. There would be uproar within the very community that is expected to adopt the consolidated models, if this were to be reversed. In addition, if RDA is seen as not responsive to the needs of cataloguers, it is very likely to give way to local practice. The less credible RDA appears, the less influence it will have in the development of BIBFRAME.

The WG certainly understands the need to move forward. We are in full agreement that developing linked data models is essential toward the goal of un-siloing the vast amounts of bibliographic metadata that is invisible on the Web. We are also very appreciative of the work, time, and effort that has gone into the consolidated models and are fully supportive of these efforts. It is in this spirit that the WG submits this working document.