

**To:** Joint Steering Committee for Development of RDA

**From:** Ebe Kartus, ACOC Representative

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

ACOC thanks the Fictitious Working Group for this working document on the incorporation of fictitious, pseudonymous and non-human entities in the FR consolidated model.

ACOC agrees with the position taken by the Working Group that the proposed scope of “Agent” and in particular “Person” in the FR consolidated model is too narrow and would support a submission to IFLA seeking a broader scope which includes fictitious, pseudonymous and non-human entities.

If the narrower scope currently proposed for the FR consolidated model is carried forward, JSC should consider the implications for RDA and whether the broader definition of Person in RDA should be retained. ACOC thinks there is a persuasive argument for doing so and also extending this to the definitions of Families and Corporate Bodies.