

THE ARCHIVAL DOCUMENT: A SUBMISSION TO THE INQUIRY INTO AUSTRALIA AS AN INFORMATION SOCIETY

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The submission which appears below was prepared on behalf of Monash University's Graduate Department of Librarianship, Archives and Records for the Inquiry into Australia as an Information Society being conducted by the House of Representatives Standing Committee for Long Term Strategies. It appears substantially as presented, although some format changes were necessary for journal publication.¹

Introduction for Archives and Manuscripts Readers

The Inquiry into Australia as an Information Society is initially concentrating on the general policy aspects of Australia as an information society. Later stages will deal with the development of libraries, using the 1976 Horton Report on "Public Libraries in Australia" as a basis for its review, and the provision of information to parliamentarians.

In 1985 the Discussion Paper, *A National Information Policy for Australia*, was published by the Commonwealth Department of Science, but following the Department's abolition in 1987 no further work was undertaken on it. Recently, in response to calls for the establishment of a National Information Policy by professional groups, especially those involved in the provision of library services,

the matter has been taken up by the Standing Committee for Long Term Strategies.

The terms of reference of the Inquiry relating to a National Information Policy include consideration of:

- the desirability of adopting a National Information Policy
- which elements should be included
- equity in information access and transfer
- the international dimension and the impact on national sovereignty
- the economic importance of information as a factor of production.

When we first heard that the National Information Policy was being revived yet again, we obtained a copy of the "Information Paper" on the terms of reference, intending to prepare a brief submission on the recordkeeping aspects addressed. There were none. The "Information Paper" refers to a number of information related areas including the information technology industry, telecommunication services, educational services and libraries, but does not include archives and records management, perhaps a disturbing sign of the relative invisibility of the recordkeeping professions in Australia. Privacy, Freedom of Information, and "Trans-Border Data Flow" rate brief mentions, but even these references show no insight into the documentation processes beneath these issues. Accordingly, our aim came to be the production of a convincing case that the archival document and its management should be a component of a National Information Policy. The case depends upon developing an understanding of the nature and special characteristics of archival documents themselves, and their relationship with other information components.

The submission argues that recognition of the role of archival documents and the establishment of a framework for their effective management are preconditions for an information-rich society. In Australia we are in urgent need of a policy framework for managing archival documents in the 1990s. The development of such a framework should form an integral part of the development of a National Information Policy. Thus the submission includes recommendations relating to the establishment of recordkeeping principles and standards as well as guidelines on the regulation of recordkeeping, in particular through the role of Australia's archival authorities, and the extension of legislative provisions relating to access and privacy protection. It also argues that such action would need to be supported by research, especially in relation to the impact of modern technology, and promotion of awareness and cooperative action, coordinated at a national level.

The absence of recordkeeping perspectives from the initial "Information Paper", and the recordkeeping professions' weak profile, do not lead us to be confident that the submission will have a significant impact on the Inquiry. If archivists and records managers are going to play an appropriate role in Australian society, we need to work through suitably refocused machinery to strengthen our own images of the significance of our role, produce coherent programs arising from these strengthened images, and pass both on into wider forums, thus positioning ourselves to influence federal and state legislation and archives and records-related policy. The submission is reproduced here in the hope that it will stimulate thought on these processes.

SUBMISSION TO THE INQUIRY INTO AUSTRALIA AS AN INFORMATION SOCIETY, HOUSE OF REPRESENTATIVES STANDING COMMITTEE FOR LONG TERM STRATEGIES

The Archival Document

The record of a transaction is only properly useful for current and historical purposes when it has the qualities of completeness, accuracy and reliability. Archival documents first and foremost provide evidence of the transactions of which they are a part — from this they derive their meanings and informational value. Currently the integrity of the record is under threat in a number of areas.

Foreword

We draw the Inquiry's attention to a component of a national information policy which is implicit in the terms of reference, but has not been addressed in the Inquiry's "Information Paper". That component is the "archival document" and its management, usually by records managers and archivists, in ways which maintain its integrity and useability. The effective creation and management of the archival document is a precondition of an information-rich society and underpins the public accountability of government and non-government organisations, Freedom of Information and Privacy legislation, protection of people's rights and entitlements, and the quality of the archival heritage.

For anyone not familiar with the term, the archival document can best be conceptualised as recorded information arising out of transactions — it is created naturally in the course of transacting business of any kind, whether by governments, businesses, community organisations or private individuals. The recording of transactions may be in any storage media and is increasingly becoming an electronic process. The concept of the archival document is a common-place within European thought, but in English-speaking countries it is often confused with documents that have been selected for retention within

an archival institution. The lack of an adequate construct to explain the processes of creating and maintaining recorded information arising out of transactions within English-speaking countries creates a distracting division within the recordkeeping profession between records managers, who look after current archival documents, and archivists, who look after our archival heritage which includes archival documents which have been selected for permanent retention. An understanding of the archival document which encompasses both current and historical documents directs attention to the continuum of processes involved in managing the record of a transaction from systems design to destruction or select preservation within the holdings of an archival institution. This European-derived approach provides a much sharper focus for the development of national information policies. Within this approach, documentation of a transaction is archival from the time the record is created and the archival document retains evidential value for as long as it is in existence.

While archival documents are part of a broad information base and share much in common with other forms of recorded information, they have special distinguishing features and characteristics which require the development — within a National Information Policy — of principles and practices dealing specifically with them. As they form an integral part of the transactions of a body, archival documents have a special status in relation to that body's survival and welfare. For this reason conflicts may arise in relation to issues of ownership of and access to the information archival documents contain.

The archival document plays a significant role in regulating relationships within an organised society. Its role is so pervasive that its importance is often neglected. During the 1980s in Australia we have had numerous reminders of its importance through:

- Privacy and Freedom of Information legislation, both of which focus primarily on the archival document, and address the need for access to information in a democratic society, and the need to protect individuals from the misuse of information about them.
- An increasingly positive use being made of the archival document, demonstrated by the movement away from cumbersome information reporting and towards simpler record audit approaches within the areas of taxation and financial control (information reporting approaches and records audit approaches are explained and contrasted in Part 2, Issue 2).
- The negative results of the wilful neglect of the archival document which is continually being revealed in reports on the collapse of numerous corporate entities which have broken their bond with organised society by reverting to primitive "remembrance" recordkeeping, or by adopting spurious recordkeeping practices

(these negative results and an explanation of “remembrance” recordkeeping are dealt with in Part 2, Issue 2).

- The growth of interest in the documentation of transactions across national boundaries which raises issues relating to privacy, access to information and legal sovereignty.

The archival document also represents the experience of the parties to the transaction which it records. It is more than recorded information. Those archival documents which are selected for permanent preservation become part of the archival heritage of a society, transmitting the accumulated experience of the transactions they document to future generations. The Inquiry’s “Information Paper” claims that bureaucracies are “information rich”. We would contend that bureaucracies are rich in the experience contained in their archival documents. They may not be as information poor as most of us, but it distorts reality to call them “information rich” unless one points out that the richness is derived from the transactions they are involved in, and that they have similar problems to everyone else in coping with information overload. If we are to move beyond the “information age” towards the “knowledge age” we will need to develop appropriate techniques for sharing the accumulated experience contained in archival documents, whether current or historical. The information technologies which will be introduced during the 1990s may be applied to develop appropriate sharing, or may be used to concentrate knowledge in a few hands to the detriment of the community. The management of the archival document, especially in the electronic recordkeeping environment that the 1990s will bring, thus has clear relevance to the following terms of reference of the Committee:

- equity in information access and transfer, including access by Members of Parliament
- the dimension of the information explosion
- issues of personal, organisational, national, and international sovereignty (a slight rephrasing of the terms of reference to indicate that “sovereignty” operates at different levels)
- information as a factor in employment, production, and export.

PART I: RECOMMENDED ACTION AREAS

Action Area 1: Development of Recordkeeping Principles

We ask the Inquiry to consider the development of a set of recordkeeping principles for incorporation into the National Information Policy.

Effective creation and management of the archival document to ensure its integrity and validity is a precondition for an information-rich society and underpins public accountability on the part of both

government and non-government organisations, FOI and privacy legislation, protection of people's rights and entitlements, and the quality of the archival heritage.

The proposed recordkeeping principles would relate to the creation and maintenance of records that adequately and properly document an organisation, its functions, policies, decisions, procedures and essential transactions with the objective of providing for:

- the protection of the legal, financial and other interests of an organisation and of the rights and entitlements of its employees, clients and the general public
- continuity and consistency in management and administration
- informed policy development and decision-making
- record audit, information reporting and information access responsibilities.

They would need to include guidelines on managing electronic records (see Action Area 3) with links to system design requirements. They would also need to take account of the special status of archival documents in relation to an organisation's survival, welfare and activity, and of the possible conflicts of interest between e.g. an organisation's interests, the rights of its employees and clients, and its duty to society.

A possible development model would be a more general application of the Commonwealth Government's approach to the development of information privacy principles, extending across the three tiers of government and into the private sector on an industry-by-industry basis.

Links to: Issues 1 and 2, Part II, below.

Action Area 2: Guidelines on the Role of the Archival Authority

We ask the Inquiry to consider establishing guidelines as part of the National Information Policy on the role of and the legislative base for an archival authority.

Government archival authorities with regulatory and advisory roles, appropriately placed within the administrative structure and supported by legislation, are needed to ensure the integrity and useability of the archival document for current and historical purposes and to promote ethical recordkeeping.

A starting point for this consideration could be the guidelines produced by UNESCO's General Information Programme which aims, in part, to promote the formulation of national, regional and international information policies and plans and to disseminate methods, norms and standards.²

Links to: Issues 1 and 2, Part II, below.

Action Area 3: Review of the Impact of Electronic Technology on the Archival Document and Heritage

We ask the Inquiry to consider incorporating in its terms of reference a Review of the Impact of Electronic Technology on the Archival Document and Archival Heritage in Australia, including identification of the threats and opportunities posed by information technology, and drawing on the expertise of all relevant professional groups, including records managers, archivists, information systems designers, information managers, administrators, industry representatives, historians, and legal experts.

Currently the integrity and proper use of the archival document is under threat from modern information technology. The fragility and rapid obsolescence of electronic media, the ease with which documents can be changed or erased, and problems associated with security and validation give rise to the creation of records which have questionable conventional evidential values, and are at greater risk of inadvertent or deliberate loss. Longer-term preservation of historically valuable documents in a useable form is a major challenge to Australia's archival institutions, exacerbated by a lack of universal standards for document transfer and conversion, as well as system incompatibility. At the same time, the technology may also offer unprecedented opportunities for sharing the current archival document across all tiers of government and the private sector and preserving and making available historical records. However, no single organisation or constituency can tackle the problems or take advantage of the opportunities.

Links to: Issues 1, 2 and 3, Part II, below.

Action Area 4: Promotion of the Development of Integrated Access and Privacy Codes and a Coordinated Approach to Legislation

We ask the Inquiry to consider incorporating into its terms of reference the promotion of integrated FOI, Privacy and Archival Access legislation and codes of practice across all tiers of government and into the private sector, and of a coordinated approach to legislation relating to recordkeeping.

The community's rights of access to the archival document (whether current or historical) and of privacy protection are adequately addressed at Commonwealth level through a judicious blend of FOI, Privacy and Archives legislation. Not so at other levels of government or in the private sector, although some States are addressing the issues and looking to the Commonwealth model or modifications of it. In the private sector codes of practice, following the European approach in the privacy area, may be appropriate.

There are many other legislative provisions relating to recordkeeping, for example census, electoral, company regulation and taxation law. There is a need for a coordinated approach at both intra-

government and inter-government levels.

Links to: Issue 4, Part II, below.

Action Area 5: Coordinated Action on Preservation and Use of Australia's Archival Heritage

We ask the Inquiry to consider incorporating into its terms of reference the fostering of coordinated action on the preservation and use of Australia's Archival Heritage.

A range of institutions and organisations have responsibilities for Australia's archival heritage. There is a need for coordinated action, involving bodies such as the Australian Council of Archives and Australian Council of Libraries and Information Services, on a number of fronts, including:

- acquisition and collection policies
- preservation and conservation of records both in and out of custody
- promotion of the value and use of Australia's archival heritage, e.g. through directories and guides
- the impact of electronic recordkeeping on the archival heritage (see also Action Area 3).

One means of fostering a coordinated approach which could be considered by the Inquiry is the establishment of a coordinated research and development grants scheme using the British Library's Research and Development Department's approach as a model.

Links to: Issue 5, Part II, below.

Action Area 6: Promotion of Debate on Shared Responsibility for Managing the Archival Document

We ask the Inquiry to incorporate the concept of the archival document into its Information Policy formulations, to foster debate on the shared nature of the responsibility for its management, and to raise the level of awareness of the role of records audit approaches in promoting social cohesion.

Direct responsibility for managing the archival document is shared by a range of professional groups, but all managers, other professionals, business and community people should have an interest in recordkeeping in their own sphere of activity. Within Australian society there is little understanding of how important recordkeeping is to social cohesion. The role of the archival document in regulating the network of relationships in an organised society should be recognised in the process of formulating a National Information Policy.

Links to: Issues 1, 2 and 5, Part II, below.

PART II: RELATED ISSUES

Issue 1: The Integrity of the Record

The record of a transaction is only properly useful for current and historical purposes when it has the qualities of completeness, accuracy and reliability. Archival documents first and foremost provide evidence of the transactions of which they are a part — from this they derive their meanings and informational value. Currently the integrity of the record is under threat in a number of areas.

Modern information technology with its associated problems of security, stability of the storage media, and authorisation, gives rise to the creation of records which have questionable conventional evidential values. Greater integrity of computer records is emerging gradually in response to need, but recognition of the issue within a National Information Policy will help quicken the process. For a detailed study of why it is urgent that the process be quickened we refer the Inquiry to the National Academy of Public Administration's report, *The Effects of Electronic Recordkeeping on the Historical Record of the US Government*, January 1989,³ and to the reference in the Department of Science's 1985 Discussion Paper, *A National Information Policy for Australia*, to the fact that the communication technology being used for transborder data flow was even then outpacing the development of international conventions, rules and procedures (legal and otherwise).

The integrity of the record is also under threat from a media driven approach to political activity where the "angle" is vital to gaining exposure for ideas, policies and programs, and there is little place for substance within public debate. In this context the archival document becomes a threat as it reveals instances where action is all form and no substance, or where the truth is different from the public presentation.

Poor or unethical recordkeeping practices also threaten the integrity of the archival document, as does destruction without proper evaluation, authorisation and documentation. All result in a distorted record of transactions with consequences for public accountability, access and privacy protection. The quality of our archival heritage is dependent on proper current recordkeeping practices and regulated destruction processes. Records disposal authorisation processes need to be exercised by government archival authorities appropriately placed within the administration and supported by legislation. Their regulatory and advisory roles need to be supported by the Ombudsman and other agents of regulation.

Protection of the integrity of the record has its own reward for the regulated organisation. The experience contained in the archival document provides a stabilising factor within which change can occur.

Appropriate change requires a knowledge of the past, an understanding of the present, and a vision of the future. This, in turn, requires the presence of properly useful records of transactions. Complete, accurate and reliable records of transactions are needed to support policy development and decision-making, and to give continuity and consistency in management and administration.

Links to: Action Areas 1-3, Part 1, above.

Issue 2: The Promotion of Ethical Recordkeeping at all Levels of Society

Because the archival document is created naturally in the course of our transactions, it provides a much better means of controlling our inter-relationships than information reporting. This simple concept, understood by the earliest Mediterranean traders, has been neglected during the process of financial deregulation. Recordkeeping places no particular burden on commercial or financial actions, other than for the subsequent maintenance and disposal of the record itself. It is noteworthy that records management, as a profession, is at its strongest within the privatised American society. Few complaints are raised about the cost of recordkeeping including the cost of staff infrastructures. When American business complained about government paperwork in the 1970s it was information reporting, not recordkeeping, that was the target. No one ever goes broke by keeping proper records, unless those records reveal activities which a society wishes to penalise.

When organisations wish to act in ways which are basically anti-social, they ignore recordkeeping, or revert to the ancient tradition of the "remembrancer", who was the recordkeeper for groups before more reliable methods of documentation had been developed. In July of this year [1990], *The Age* newspaper, in an article on "Greed", led with the following illustrative quote from a regulator explaining how some Australian business was conducted during the 1980s:

"You have mates in a very loose network, but they cannot commit things to paper. So how do they know what their arrangements are? They don't really trust one another. This mateship is pretty shallow, based on greed. So they have to have some arbitrator, an 'archbishop', someone beyond reproach to listen to the negotiations. The worst they can do is put it on paper. So the 'archbishop' records it in his head. If there's a dispute, he'll be called in."⁴

With the ready availability of unethical recordkeeping practices it is important that we move away from information reporting and towards greater use of records audits to regulate our organisations. The difference between the two can be seen, for example, in the difficulties State governments have had in regulating building societies. These societies developed outside of the rigid Commonwealth financial

controls after World War II. States developed relatively informal regulations based around information reporting rather than the spot auditing of records of major transactions. In Victoria, we are paying a 2.4 cent levy on every litre of petrol partly as a result of reliance on information reporting of building society activities, rather than on records audit approaches.

The cost inefficiencies of information reporting were clearly explained in the United States Federal Paperwork Committee reports of the 1970s. They estimated that the Federal Government collected as much as 300 billion data items per year. They estimated the cost to the business community of providing this information to be around \$25-32 billion annually, and that the annual costs of managing this paperwork at the Federal end was in excess of \$50 billion.⁵

At an individual and corporate level, the Taxation Office has shown the way costs can be reduced for all parties by moving to processes of records audit. Given the cost effectiveness of such approaches, and the sad tales of distorted recordkeeping within corporations in the 1980s, the Committee should, in our view, ensure that the matter of auditing the archival document be included on the Information Policy agenda, along with the promotion of ethical recordkeeping.

Links to: Action Areas 1-3 and 6, Part I, above.

Issue 3: Taking up the Challenge of Modern Information Technology

We are on the threshold of unprecedented changes in our recordkeeping practices, more revolutionary even than the development of clay tablets and cursive script. The experience contained within the archival document will be able to be shared widely across and between the three tiers of government and out in the community. The sharing process can be extended to the archival documents of private and corporate citizens (as was the case in the Greek City-State from whence the basic principles of democracy were derived).

The previously mentioned National Academy of Public Administration's study of the effect of electronic recordkeeping argued that "the same technologies that may threaten the validity, integrity, and permanence of the historical record may also offer unparalleled opportunities for guaranteeing the preservation and availability of documentation". This conclusion, it should be noted, relates to the current record as much as to the record held by archival institutions. The report draws attention to the need to gain "greater understanding of electronic technology and its impact on records, and formulating new methods of managing electronic records".⁶

The process of sharing has already commenced, most notably in land

data systems. In such situations it is readily seen as an opportunity. When applied to archival documents relating to people, the sharing of information is seen as a threat. A National Information Policy needs to identify in broad terms the threats and opportunities presented by our growing capacity to share the archival document.

Links to: Action Area 3, Part I, above.

Issue 4: The Sharing of Access to the Archival Document

Access to the archival document is a community issue. The sharing of the experience of the archival document can avoid duplication of effort and be used to coordinate research and development across a community of willing participants.

At government level the opportunity to share the archival document is clear. With more than 800 local authorities dealing with similar issues, with numerous parallel state authorities dealing with everything from road construction to sewerage, and with a growing awareness of the need to rationalise our three tiers of government, the impetus to share is undeniable.

The community's rights of access to the archival document, whether current or historical, and to privacy protection are adequately addressed at Commonwealth level through integrated FOI, Privacy and Archives legislation. The States are moving (some more quickly than others) in this direction. The situation at local government level is less clear and the community's right to access information or privacy protection in the private sphere is very limited.

There is a definite need to extend the discussion on shared access and privacy protection to non-government recordkeepers. This issue has been raised in a number of reports to the Victorian Parliament, and does not seem to be receiving a serious hearing. One suspects that this is because people are thinking in a "public v private" mind set. As the following quote from Privacy Commissioner Kevin O'Connor indicates, the issues do receive a serious hearing in Europe, possibly because they have more vision of the future, and more synergy exists between government and non-government operations:

"The work of the Council of Europe provides the best guide overseas to areas of record-keeping of particular concern to technologically advanced countries. We can expect, I feel, that the issues being canvassed at the Council of Europe are likely also to be significant in Australia. The Council of Europe has made formal recommendations on automated medical databanks, direct marketing, social security, police and employment records. Currently it has a major project examining electronic funds transfer and banking and financial records practices. Alongside this European activity the OECD has been actively seeking to obtain voluntary adoption of its principles by major international record-handlers. It has negotiated codes with the International Air

Transport Association (IATA), the Canadian Bankers Association and the Centre for Financial Industry Information Systems in Japan.”⁷

The sharing of the archival document for positive purposes should also be promoted on an industry-by-industry basis, together with the establishment of community access rights to both government and non-government information. We also need to be looking at the extension of the Commonwealth Government’s privacy principles into all areas of recordkeeping, including private enterprise on an industry-by-industry basis.

Links to: Action Area 4, Part I, above.

Issue 5: Shared Responsibility for the Archival Document

In the 1970s the concept of Information Management (or Information Resource Management) developed as a means of coordinating the work of the information professions including information systems personnel, librarians, archivists, and record managers. The professions, however, remain relatively compartmentalised and inter-disciplinary approaches appear to have faltered. The concept of the archival document is supra-disciplinary. All the professions listed above share responsibility for the care of the archival document and a greater awareness of this concept is important for the successful coordination of their activities.

There is a special need for cooperative action in relation to archival heritage. A range of institutions and organisations have responsibilities for Australia’s archival heritage, including government archival authorities at all levels, collecting archives such as the Commonwealth and States’ manuscript libraries and university archives, in-house archives established by businesses and community organisations, and local collections such as those held by historical societies and public libraries. There is a need for coordinated action, involving the Australian Council of Archives and the Australian Council of Libraries and Information Services, in a number of areas, including:

- acquisition and collection policies
- preservation and conservation of records both in and out of the custody of the institutions
- promotion of the value and use of Australia’s archival heritage, e.g. through directories and guides
- the impact of electronic recordkeeping on the archival heritage (see also Issue 3).

The British Library, through its Research and Development Department, provides a model for coordinated effort in the funding of Research and Development projects. It awards grants for research into

a variety of information service projects including applications of new technology, basic information science research, and Information Policy and the Economies of Information, and also provides grants for a variety of conservation and preservation projects.

Shared responsibility for the management of the archival document in ways which ensure its integrity and useability for current and historical purposes extends beyond those groups with a particular professional interest. All managers, other professionals, and business and community people should have an interest in recordkeeping within their own sphere of activity. Within the Australian psyche recordkeeping as an activity is relegated too often to a facilitative role in support of an organisation's objectives. There is little understanding of how important it is to social cohesion. As Luciana Duranti has demonstrated:

“The first and fundamental need of any organised society is the regulation of its network of relationships by means of objective, consistent, meaningful and useable documentation.”¹⁸

The Standing Committee should aim to ensure that this “first and fundamental need” is discussed more widely in Australia, and that the concept of the archival document takes its place within the process of Information Policy formulation at a national level.

Links to: Action Areas 5 and 6, Part I, above.

ENDNOTES

1. The submission is published with the permission of the House of Representatives Standing Committee for Long Term Strategies. The authors would like to acknowledge the support given by Chris Coggin, Chris Hurley and Michael Piggott, all in a private capacity, in commenting on earlier drafts.
2. *Archival and Records Management Legislation and Regulations: a RAMP Study with Guidelines*, prepared by Eric Ketelaar for the General Information Programme and UNISIST, UNESCO, Paris 1985 (PGI-85/WS/9). This publication includes guidelines to assist in planning or reviewing the legal and administrative instruments essential for viable modern records management and archival systems and services, particularly in public administration.
3. The National Academy Report was commissioned by the US Government's archival authority, the National Archives and Records Administration.
4. “Greed, The Schemes and Networks that sent Australia broke”, originally published in the *Sydney Morning Herald* and published in the *Sunday Age*, 29 July 1990, “Agenda”, p. 1.
5. “Information Resource Management”, *A Report of the Commission on Federal Paperwork*, Washington DC, September 1977, p. 2.
6. National Academy of Public Administration, *The Effects of Electronic Recordkeeping on the Historical Record of the US Government*, January 1989.
7. Kevin O'Connor, “Information Privacy and International Trends”, in *Convention Proceedings*, 6th National Australian Convention of the Records Management Association of Australia, Perth 1989.
8. Luciana Duranti, “The Odyssey of Records Managers”, *ARMA Quarterly*, American Records Management Association, October 1989, p. 4.

This submission deals with a number of issues vital to our profession.

The Council would like feedback from members, with their reactions to the issues presented and their ideas about other issues which should be raised in this context. Please address correspondence to The Secretary, PO Box 83, O'Connor, ACT 2601.

Members of course are also welcome to use this journal to present their reactions to this submission. Please contact the Managing Editor to discuss publication deadlines.