

New Protection of Documents and Archives and Archival Institutions Act: the Successful Way into the Standardization of the profession or its destruction

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The Amendment of the Protection of Documents and Archives and Archival Institutions Act is about to enter parliamentary procedure and the author of the paper draws attention to the major change included in this new archival act. The existing Act (adopted in 2006) introduced archival public service with a considerable number of new tasks, especially when compared to archival acts of the past 30 years. The new proposal includes again the reorganization of archives introducing the centralization, which was in 2006 removed from the draft of the law. The author will try to explain in the article the reason for and against the centralisation.

1. INTRODUCTION¹

Slovenia gathered many laws on archives (with variant names) from the first Slovenian Law on Archive Material and Archives, 1966 (Official Gazette, 4 -24/1966) and to this day². Natural and Cultural Heritage Act from the year 1981 (Official Gazette, 1/1981), considered the archives exclusively as a cultural monument. Archive area was otherwise treated in a special section II č (Special Provisions on the protection of archival material), and archival service in Chapter III c (Archives), but it is clear that the law has followed the concept of the unique protection of cultural heritage and provided the protection of archives together with all other cultural monuments and heritage. It should be noted that the Act defined as archives only those documents and records that had lasting significance to science or culture. For the duration of this act the archival network was conceptually very similar to the museum network - the Archives of the Republic of Slovenia as a central archival institution and a body within the state administration in charge for the documents, created at the highest level on one hand, and on the other regional archives, which were in charge of archives of the unites of public and state administration bodies and socio-political organizations established in the region of their activity. Their founders and financers were municipalities (Matič, 2010).

After the independence of Slovenia in 1991, it was clear that the political change in the system will also bring some changes into the archival legislation. The Constitution of the Republic of Slovenia from December 26, 1991 eliminated the social property and introduced new market economy. The new constitution ensured the respect of fundamental human rights, while ensuring the independence of the judiciary and particularly the independence and autonomy of universities and other higher education institutions, as well as local self-government foundation. The Act of the Organization and Working Tasks of the Republic administration from June 12, 1991 changed also the status of the Archives of the Socialist Republic of Slovenia, which became a Body under the responsibility of the Ministry of Culture and was renamed. It took the title which it still has today, the Archive of the Republic of Slovenia³. Due to societal changes also the status of regional (history).archives, which became independent public institutions, was changed on the basis of the Institutions Act and the Enforcing Public Interest in the field of culture Act (passed in 1991 and 1994)⁴.

1. The present article presents the summary of different opinions related to the new amendment of the Archival Act that were gathered from already published articles, from the discussions with professional colleagues and with the comparison of the legislation. It is not giving the advantage to any of the solutions but only presents reasons for and against.

2. ŽONTAR, 2007, p. 16.

3. ŽONTAR, 2007, pp. 25–27.

4. ŽUMER, 1990, pp. 137–139.

From the very beginning of the introduction of major social changes archivists have emphasized the need to harmonize existing archival legislation with a new administrative system and the development of independent Slovenia, stressing the importance of the preparation of the separate law to govern the whole area of archival activities, including elements of modern archival theory and practice⁵. Indeed it was the fact that the situation in Slovenian archival theory and practice was not satisfactory, particularly as a result of the significant changes in organisation and work of the social, cultural, educational and other institutions and organisations, particularly in the economy, which have privatized next and which were recognised as large creators of records and archives⁶.

Therefore it was necessary to prepare the new independent law governing archives as soon as possible. It was especially needed because many creators of records and archives did not respect previous archival legislation and that resulted an impermissible destruction of records and archives, especially there where the individual archives (and archivists) were not sufficiently and professionally engaged. That led to the drafting and adoption of the new Archives and Archival Institutions Act that was passed on March 27, 1997 (Official Gazette, no. 20 - 1149/1997, revised in no. 32/1997)⁷.

Archives and Archival Institutions Act has brought serious innovation. Archives were excluded from the Natural and Cultural Heritage Act. In the first article of the Archives and Archival Institutions Act it was written that: *"This Act regulates the protection of archives, the conditions for use as well as competences and duties of archival institutions."* At the same time, however, it still maintains the same definition, namely that as archives are considered records with lasting significance for science and culture which are protected as a cultural monument. In the new way the Act defined the financing of the public archival services: the founder of regional archives has become a state (instead of previous municipalities). This has brought a great relief in the work of archives. In addition, the system of the public archival service remained unchanged. The Act defined also the basic duties of regional archives. So the primary task became the safeguarding of archives created by state authorities, organizational units of state authorities and by public authorities or public service provided by the state and who has been operating in the territory of one or more local self-governing communities. It is envisaged that the self-governing local communities can establish own archives to protect their document. In the case they are not created the material of the municipalities is kept by regional archives (Matič, 2010).

Even greater difference on the definition of archives and records service tasks brought the Protection of Documents and Archives and Archival Institutions Act, passed in 2006 (Official Gazette, no. 30/2006)⁸. From the title of the Act one can see the ambition, to regulate in addition also the field of records creation and management, which is an impressive task. Already the first article shows of the magnitude of the tasks given to the archival profession: *"The present Act governs the method, organization, infrastructure and implementation of capture and storage of documents in physical and electronic form, effectiveness and evidentiary value of such materials, protection of archives and conditions for use of archives, tasks of archival institutions and the public archival service as well as the related services, and super-*

SEMLIČ RAJH, Zdenka, Nuova Legge sulla protezione dei documenti e degli archivi ed istituzioni archivistiche: la via di successo alla standardizzazione della professione o la sua distruzione. Atlanti, Vol. 20, Trieste 2010, pp. 219-227.

L'emendamento della Legge sulla protezione dei documenti e degli archivi ed istituzioni archivistiche sta per entrare nella fase di procedura parlamentare, e l'autrice dell'articolo rivolge l'attenzione al grande cambiamento incluso in questa nuova legge. La legge esistente (adottata nel 2006) introduceva il servizio pubblico archivistico con un considerevole numero di nuovi compiti, specialmente a paragone delle leggi dei passati trent'anni. La nuova proposta include di nuovo la riorganizzazione degli archivi introducendo la centralizzazione, rimossa nel 2006 dalla bozza legislativa. L'autrice cercherà di spiegare nell'articolo le motivazioni a favore e contro la centralizzazione.

SEMLIČ RAJH, Zdenka, Nova slovenska arhivska zakonodaja: pot v poenotenje stroke ali njeno uničenje. Atlanti, Zv. 20, Trst 2010, str. 219-227.

Novela zakona o varstvu dokumentarnega in arhivskega gradiva in arhivih, ki prinaša novosti predvsem na področju organizacije javne arhivske službe, je tik pred vložitvijo v parlamentarno razpravo. Avtorica v prispevku opozarja na nekatere spremembe, ki jih prinaša novela, predvsem tiste, ki so povezane s vprašanjem reorganizacije javne arhivske službe in podaja razloge za in proti reorganizaciji arhivske službe.

SUMMARY

Slovenia gathered many laws on archives (with variant names) from the first Slovenian Law on Archive Material and Archives, 1966 (Official Gazette, 4 -24/1966) and to this day. Natural and Cultural Heritage Act from the year 1981 (Official Gazette, 1/1981), considered the archives exclusively as a cultu-

5. ŽONTAR, 1991, pp. 7–20.

6. KLASING, 1991, pp. 1–2, 54–58.

7. See: Predpisi s področja arhivske dejavnosti ..., 2001.

8. See: Arhivski predpisi v Republiki Sloveniji, 2007.

ral monument. After the independence of Slovenia in 1991, it was clear that the political change in the system will also bring some changes into the archival legislation. That led to the drafting and adoption of the new Archives and Archival Institutions Act that was passed on March 27, 1997. Archives and Archival Institutions Act has brought serious innovation. Archives were excluded from the Natural and Cultural Heritage Act. Even greater difference on the definition of archives and records service tasks brought the Protection of Documents and Archives and Archival Institutions Act, passed in 2006. From the title of the Act one can see the ambition, to regulate in addition also the field of records creation and management, which is an impressive task. The goals of the 2010 proposed new Act are the reorganization of the public archival system, consolidation of all public archives in the new National Archive, elimination of ambiguities and rectify problems in the implementation of the law, better protection of archives and cultural heritage, completion of the current system of protection of records and archives in digital form in accordance with technological development and the increase of efficiency, economic management and the reduction of costs for the public archival system. The main solutions given by the new Act are the unification of all public archives in one National Archives, regulations governing the protection of archives of political parties and legal persons acting in the public interest and religious communities and determination of the rights of owners of private archives. The question that arises regarding this new proposal is whether Slovenian archival system needs the reorganisation or not. Without exact analysis and evaluation it is impossible at present to assess whether the reorganization of public archive service and the merging of the existing archives in the National Archives makes sense or not. If we do not have any relevant analysis showing that reorganization would actually bring a significant improvement of the archival profession in Slovenia and not just the change in organizational structure and the network and if a

vision over the implementation.” The new law extended the activities of the archives to the records management and supplemented the definition of archives. In the new definition archives “are documents being of permanent significance for science and culture or for legal safety of persons, in compliance with professional instructions by competent archival institutions”. In addition to this basic innovation the law manages the protection of e-records and archives. Due to the specific type of such a records it is clear that it will not be possible to preserve it for a long-term, if not already at its creation and further handling the care will be taken to use appropriate hardware and software to store the material in formats for long-term storage, etc.. It is important to preserve the usability (not just access to the record, but also the possibility of reading and understanding), authenticity and legal validity of the documents. Archival public service seeks to influence through the law the form and characteristics of documents from the time of their creation, through their life cycle to the moment of being transferred to the archives. (Matič, 2010).

2. THE PROPOSAL OF THE AMANDEMENT OF THE ACT OF 2006

According to the proposers the goals of the proposed Act⁹ are the reorganization of the public archival system, consolidation of all public archives in the new National Archive, elimination of ambiguities and rectify problems in the implementation of the law, better protection of archives and cultural heritage, completion of the current system of protection of records and archives in digital form in accordance with technological development and the increase of efficiency, economic management and the reduction of costs for the public archival system. The main solutions given by the new Act are the unification of all public archives in one National Archives, regulations governing the protection of archives of political parties and legal persons acting in the public interest and religious communities and determination of the rights of owners of private archives.

The first initiative for the updating of the Protection of Documents and Archives and Archival Institutions Act occurred due to technological progress and certain knowledge in the area of the preservation of documents in digital form. Thus, a number of Articles in the draft of the novel is improved in line with developments in the information profession and experiences gained during the implementation of the Act of 2006. The new law will complement the existing regulation for the protection of records and archives in digital form, what is a result of technological development and the development of archival science. In so far as it relates to the preservation of records and archives in the physical form the law does not impose significant new features, but only supplements or improves already existing system.

The most important change compared to the previous organisation of public archival service brings the law in that it provides the unification of all public archives in only one public National Archives. At present in Slovenia there is no unique organisation in the public archive service. Archives of the Republic of Slovenia operate under the state administration as a body within the Ministry of Culture, regional archives, however, operate as public institutions founded by the state. According to the proposers the reorganisation of

9. For details see: Predlog Zakona o spremembah in dopolnitvah Zakona o varstvu dokumentarnega in arhivskega gradiva ter arhivih – predlog za obravnavo http://www.arhiv.gov.si/fileadmin/arhiv.gov.si/pageuploads/zakonodaja/ZVDAGA_predlog.pdf (accessed July 20, 2010)

public archive service and the merging of the existing archives in the National Archives is required for several reasons: unification and standardization of archival practices, widening of knowledge and best practices, simpler and more transparent organization, economic management and the efficient use of public funds earmarked for archival work, and the comparability of our organization with organization of archives in other European Union member states. This will also eliminate the current situation, in which the archives of central state administration bodies are kept by the Archives of the Republic of Slovenia, which is a body within the Ministry, when the archives of local branches of state government - administrative units is kept by the public institutions - the regional archives. As the Archives of the Republic of Slovenia is a body within the Ministry of Culture and the regional archives are organized as independent public institutions, will the simplified organization of the entire State archives services represent a more transparent organization, which will clearly shared responsibility for the functioning of the state archival services between the Minister of Culture and Director of the National Archives. The status of all employees in the state archives service, which are today partly officials of state government and partly employees of public institutions, will be unified. It will also be simplified and thus more transparent financing of some joint projects that have already been partly co-finance by provincial and national archives.

Reorganization will, as the proposal states, not require additional funding in the budget, but only maintain the real value of the sum of the current budgets of individual archives. Substantially more rational and transparent will be the general management and financing, since some of the support functions will work uniformly and comprehensively. Taking all these effects will not be reduced in quality or geographical dispersion of the state archival service departments as the units in the National Archives, since the new organised unites will assume fully the human and other resources. The reorganization is consistent with the objectives of the Government savings measures, which aim to reduce the number of legal entities of public law.

One of the tasks of the National Archives is also the protection of film material. Slovenian Film Archive is a specific organizational unit in the National Archives. Since this is a very specific material it is necessary to provide independent Slovenian film archives. Be stressed that in some countries, film archives are organised as independent institutions. In accordance with the regulations governing bodies under the responsibilities of the Ministries the detailed organization of the newly established government authority will be set. It is planned that the current regional archives, as regional centres of archival public services, will continue to work as organizational units of the National Archives.

Another major change brought by the law is regarding the archives of the parliamentary parties and societies, or private persons acting in the public interest. Archives of the parliamentary parties and societies, or private persons acting in the public interest will, in accordance with amendments have the nature of archives. Since this material has important historic value, the change will allow the proper protection of these archives within its creator. In doing so, these

public archive services will remain such as now (only to change the name of the institution), then we can reasonably ask whether such a reorganization is necessary at all. Even more, if we take into consideration that the archive service will be particularly difficult to introduce savings measures, since any further contraction of funding earmarked for public archives services at the same time means the ability not to carry out the law, especially in the part relating to Electronic archives and the creation of Slovenian electronic archive

creators will have the possibility to co-operate with the competent archives. One might highlight also the article, which allows religious communities to protect their archives. These archives will be preserved in accordance with the provisions of this Act, which govern the protection of private archives. Finally it is worth mentioning also the supplementation of the law in the articles governing the protection of private archives. According to current law, the owner had only obligations and no benefits - which in practice proved to be very counterproductive - but following the amendment the owner has now certain rights - first of all the right for a competent professional assistance from the competent archives.

According to the proposers the proposed law will not require increased resources from the budget. Reorganisation of public archives services and the merging of the existing archives in the National Archives will not have major financial implications for the state budget.

3. COMMENT TO THE PROPOSED AMENDMENT

The proposed amendment certainly has some positive solutions that will contribute to improving the protection and access to the material. As a very positive solution we can consider the provisions regarding archives of the parliamentary parties and societies, or private persons acting in the public interest and the provisions regarding private archives.

The new law, as mentioned above, extended the activities of the archives to the records management and respecting this fact, it is obvious that such a law would require mandatory increase of the number of employees and no reduction through rationalization, because the archives impose new duties, for which archives have no trained staff today. This applies particularly to the creation of Slovenian e-archive and tasks associated with their operation.

How much will it cost the purchase of equipment, editing facilities, information equipment and programs, education and training of archivists for accession and preservation of e-records and the like? These functions will undoubtedly require a professional person with knowledge of an archivist, good IT specialist and even better lawyer. This knowledge is missing by the most of today's archivists. How many new people will have to be employed in archives, so that they can meet the requirements, or are there any plans to educate existing personal to meet the requirements?

The proposed amendment Act, as was evident from the outset, brings as the most important change, compared to the previous organisation of public archival service, the unification of all public archives in one National Archives, headed by the Director-General. All current regional and historical archives become, in case the Law is passed, the branches of the National Archives.

The question is whether it is reasonable to break the tradition of the existing network of archives, as the authors of the amendment do not justify the reorganisation with mentionable arguments, especially not with real analysis, financial assessments, and professional assessments of the new situation. The specificity of the various regional archives is indisputably proven.

As the proposers stated the duality of archival network makes for many years better development of archival services in Slovenia impossible. One of the reasons of centralization, which is quoted in a draft is, that this is the elimination of the current situation in which the archives of central state administration bodies are kept by the Archives of the Republic of Slovenia, which is a body within the Ministry, when the archives of local branches of state government - administrative units is kept by the public institutions - the regional archives. You may rightly ask the question, will it be different after the accomplished centralization?? Archives of the local branches will still be preserved by the competent archives in the region, even under the name National Archives. Except in the case that centralization also provides that the material of all local branches of state administration will be transferred to central depots of the new National Archives. Thus, the National Archives does not need branches. And it may happen, without major problems that the branches will be closed and archives moved to the central repositories elsewhere!

Novell provides that the reorganization of public archives services and the merging of the existing archives in the National Archives makes sense for several reasons: unification and standardization of archival practices, widening of knowledge and best practices, simpler and more transparent organization, economic management and the efficient use of public funds earmarked for archival work, and the comparability of our organization with organization of archives in other European Union member states. The proposed reorganization is contrary to the basic function that archives have as a separate institution with administrative, cultural, scientific, educational and similar functions, and institutional reputation, they have in a certain part of the country. Archival Service in Slovenia does not need a simplification or transparent organization, at least so long not until the claims, that the reorganization is needed, will not stand on a concrete analysis and be verified. The question is what will happen with the staff of the regional archives, which have the status of public servants today? How they will be translated into new professional titles and the corresponding wage systemised classes? What happens to workers who perform certain professional, financial and administrative functions if these services should be centralized after reorganisation. Keeping the same number of staff and the same network of national archives branches we can definitely not talk about a substantial rationalization, transparent operations and financing. Financial management and funding of existing archives, is sufficiently transparent, the same applies to financing of some joint projects that have already been partly co-finance part of provincial and national archives. In addition, the question arises whether after the reorganisation, and the centralization of financial assets in one account, the branches will be able to carry out the projects and activities successfully carried out up to now. You can imagine that this will largely depend on leadership and the will of the National Archives and could be very easily a subject of personal judgement and not professional.

Reorganisation in any sense, will not contribute to the quality of services archives offer their customers, because it is already at a very high level, particularly as regards working with clients. Also, the professional public believes that this reorganization will not contri-

bute to the scientific progress and unification and standardization of the archival profession in Slovenia because of the lack of interest. Among professional workers there are many who believe that the simplest way to something is to do it in the old way (lack of proper education), but those who should implement the changes and unification, however, do not have enough expertise to perform the professional unification as good as necessary and successfully.

The proposed law should not require increased resources from the budget. Reorganisation of public archives services and the merging of the existing archives in the National Archives will not have major financial implications for the state budget as stated by the proposers. Such claims must be proven by the calculations and professional substantiation. It should be understood that any reorganization cost itself, and it is difficult to believe that the costs provided in order to implement this reorganization should be only 40,000 Euros, as is expected.

At this point it has to be noted, indeed, that the part of the Slovenian professional public does not support such reorganization of the archival service. The proposal, which represents an alternative to the proposed reorganization and has been endorsed by all of regional archives in 2003¹⁰, proposes the establishment of a network of State archives. The Archives of the Republic of Slovenia should stop being, according to this proposal, the body under the responsibility of the Ministry, and be transformed into the independent public with the name State Archives of the Republic of Slovenia. The activities should remain the same as they are today. Existing regional archives would be renamed as for example State Archives of Maribor (Regional Archives of Maribor today) or the State Archives of Ptuj (Ptuj Historical Archives today) and so on. All of these would form a network of State archives in Slovenia. All archives would work as public institutions outside the Ministry of Culture as independent public institutions. As a body within the Ministry the Archival Administration should be established, to carry out (instead of the Archives of the Republic of Slovenia) the administrative organizational tasks in the field of public archive service in Slovenia and to co-ordinate professional archival tasks.

In this context, it must be stressed, that it would be very welcome for public archives to act as public institutions and not as a body under the responsibility of the Ministry, since it has been seen so far, that the politics had too much influence on the work of archives services. The archives are such an important segment of both the protection of cultural heritage as well as in ensuring the rights of individuals, that they have to follow exclusively the current professional principles and standards established by profession, and not the current political situation, which unfortunately is often a fact. Thus, the head of the Archival Administration should be undisputed expert authority, recognized expert in the field of archival science, which would lead and coordinate the work of archival administration and would be responsible for the development of the profession and the study of professional issues. His appointment should be in no way a political decision but a reflection of his professional qualities.

10. The proposal of the unification of the status of the Slovenian archives was signed by all Slovenian regional archives in December 2003.

CONCLUSION

Archives in different countries have different status and different responsibilities concerning the protection of documents. There is no regulation to follow, that the archives should be a part of government or public administration. We can not speak of a typical national archival service that would be present in most EU countries. The organisation of archival service is a reflection of the time in which that service was established, of the federal or unitary state government organizations, etc.. The organization and functioning of the archives services in different countries varies as its development is conditioned by different historical, legal and cultural backgrounds.

Without exact analysis and evaluation it is impossible at present to assess whether the reorganization of public archive service and the merging of the existing archives in the National Archives makes sense or not. If we do not have any relevant analysis showing that reorganization would actually bring a significant improvement of the archival profession in Slovenia and not just the change in organizational structure and the network and if a public archive services will remain such as now (only to change the name of the institution), then we can reasonably ask whether such a reorganization is necessary at all. Even more, if we take into consideration that the archive service will be particularly difficult to introduce savings measures, since any further contraction of funding earmarked for public archives services at the same time means the ability not to carry out the law, especially in the part relating to Electronic archives and the creation of Slovenian electronic archive.

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