

To: Joint Steering Committee for Development of RDA

From: Ebe Kartus, ACOC Representative

Subject: Place as an RDA entity

ACOC thanks the Places Working Group for presenting this model for possible treatment of place as an entity in RDA. We commend the Working Group for their excellent work on this, especially in their efforts to remove Anglo-American bias, and ensure all places are treated equally.

ACOC supports the overall direction of this model and looks forward to seeing a formal proposal for change to RDA. We are particularly in support of extending the concept of former and later names to places.

ACOC has one slight reservation with regard to the proposed instructions referring to conventional names of governments. These seem to assume that names of governments will always correspond to the name of the place or places over which they exercise jurisdiction. Many Australian local government jurisdictions have names that are used *only* as the name of the government, and none of the places they hold jurisdiction over share the same name. For example, **Palerang Council** in New South Wales, exercises jurisdiction over a number of townships, none of which have the name Palerang, which is used only to identify the **Council**. We suggest that any instruction around this should make it clear that this preference should only apply if the name of the government is the *same* as the place over which it exercises jurisdiction.