August 28, 2014

Ms. Mary Alice Baish

Superintendent of Documents

US Government Printing Office

732 North Capitol

Washington, DC, 20401-0001

Dear Ms. Baish:

On behalf of the Association of Research Libraries (ARL), I am pleased to respond to the request for comments on the US Government Printing Office’s (GPO) proposed public policy statement on “Government Publications Authorized for Discard by Regional Depository Libraries.” ARL very much appreciates the request for comment from federal depository libraries, and in particular, regional depository libraries—those most affected by this proposed change in practice. As almost 50% of current regional depository libraries are ARL members, 22 of the 47 regional libraries, ARL believes that the perspective of regional libraries is critically important in these discussions.

ARL has long advocated for more flexibility for those participating in the Federal Depository Library Program (FDLP) and appreciates that GPO is supportive of changes to the FDLP. As a voluntary, participatory Program, FDLP libraries and regional depository libraries in particular, make significant investments in staff, space, information and networked-based technologies and licensed resources. These investments have been consistently documented through numerous studies including GPO’s [FDLP Forecast Study](http://www.fdlp.gov/377-projects-active/1686-fdlp-forecast-study) (2012) as well as the most recent GPO [Biennial survey](http://www.fdlp.gov/%20requirements-guidance/guidance/12-biennial-survey-of-depository-libraries). These and other studies concluded that maintaining a regional depository collection presents significant costs to an institution as well as many challenging space issues given the size of the collection that is estimated to be 1.35 million volumes.

ARL agrees with GPO that changes to the FDLP are needed for the Program to reflect the current realities of how information is accessed, shared and preserved. Although limited in scope, this proposal presents an opportunity for GPO and regional depository libraries to introduce some new flexibility into the provision of services to users of regional depository libraries. It will, hopefully, also lead to additional discussions to identify new proposals to extend more flexibilities for regional depository libraries as well as identifying new incentives to continue participation in the Program. For example, GPO should actively explore and implement the means by which FDsys will authenticate more government publications. GPO should also proceed with the TRAC review (e.g. certification and assessment) of FDsys that had been previously agreed to but not undertaken. As GPO has already decided to move forward on such a certification, this would not in any way lead to a delay in implementing the proposal. Given the importance of FDsys to the Nation, it is important to ensure its future viability and stability.

Current law, section 1912 of Title 44, authorizes regional depository libraries to manage the disposal process of government publications. Given the years of experience and best practices that have been adopted by these libraries, regional depository libraries should continue in this role in lieu of new roles for GPO. Imposing potentially new regulatory burdens on these libraries would negate the new flexibilities the proposal seeks to introduce.

Given the small amount of information that will be available for electronic substitution under this proposal, there is ample time to engage with the depository library community, and regional depository libraries in particular, on how to best consider long-term preservation and access issues. Those conversations have been underway for a very long time and should not deter action on this proposal. It should be noted that regional depository libraries have been stewards of these collections, when combined, for hundreds of years. These libraries have done this at no cost to the government. Indeed, they have shouldered these costs, and some of these libraries have also taken on additional responsibilities in support of the Program.

ARL looks forward to working with GPO on implementation of this proposal while identifying incentives for regional depository libraries to continue to provide services to the public. ARL very much appreciates that GPO understands electronic access is a preferred manner of access to government information for the public. To that end, we believe that the proposal as currently drafted should provide greater clarification and be expanded to a greater number of government-produced publications.

Sincerely,



Prudence S. Adler, Associate Executive Diretor  
Cc Ms. Davita Vance-Cooks, Public Printer of the United States