



## ASSOCIATION OF RESEARCH LIBRARIES

June 10, 2008

Mr. Richard G. Davis  
Superintendent of Documents  
Director of Library Services and  
Content Management  
U.S. Government Printing Office

Ms. Cynthia Etkin  
Sr. Program Planning Specialist  
Office of the Superintendent of Documents  
U.S. Government Printing Office  
732 North Capitol Street, N.W.  
Washington, D.C. 20401

Dear Mr. Davis and Ms. Etkin,

The Association of Research Libraries (ARL) is pleased to submit comments regarding the draft Government Printing Office (GPO) study, *Regional Depository Libraries in the 21<sup>st</sup> Century: A Time for Change?* ARL commends the GPO for drafting this timely and useful report. ARL strongly supports the proposed GPO recommendations included in the draft report in order “...to ensure that regional depository libraries are able to provide unimpaired access to Government information dissemination products for future generations.” While ARL believes that current law provides GPO with the needed authority to designate shared regionals and other designations as appropriate, we support the recommendation to affirm such authority in any revision to Title 44.

Since the 1990's, the library community has been actively engaged in making numerous proposals to revise Title 44 to better reflect the many and significant changes in library services due to technological innovation and changing user information needs. Congress concurred with the library community that Title 44 required updating and considered S. 2288 in the 105<sup>th</sup> Congress. Several library associations including ARL, the American Library Association, the American Association of Law Libraries and the Chief Officers of State Library Agencies worked closely with members of the Senate and the Joint Committee on Printing to try and effect passage of this legislation. Finally, the Depository Library Council, among others, called for restructuring of the Program to meet the changing needs of both users and federal depository libraries.

The GPO draft report builds on these prior efforts and documents the pressing need for change. This documentation is accomplished through the

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presentation and analysis of a wealth of data and information garnered from a wide diversity of sources on the state of the regional federal depository libraries. These data clearly support all of the draft recommendations proposed by GPO, and confirm that “a more flexible structure within the program” is needed. Such flexibility would permit institutions greater latitude in the management of their collections and would spur innovative service approaches.

Libraries participate in the Federal Depository Library Program so that members of the public have permanent, no fee access to government information. New library services and cooperative efforts utilizing digital technologies *improve access* and also mean that models or structures based solely on geography are no longer relevant. The recommendations included in the draft GPO report are formulated to both explicitly ensure that access continues in the future and is *enhanced* by permitting participants to engage in new collaborative relationships that take advantage of information and networked-based technologies. ARL supports GPO’s recommendations and the findings of the draft report because there is the recognition that in order for the Program and its participants to achieve the goal of providing effective access to government information, there must be change in the structure of the Program.

ARL very much appreciates GPO’s willingness to work with the community on possible changes to Title 44. Such an approach is important if these continuing discussions are to be successful.

Please let me know if there is additional information that I can provide.

Sincerely,



Prudence S. Adler  
Associate Executive Director  
Association of Research Libraries