October 19, 2011

Public Printer William J. Boarman
Government Printing Office
732 North Capitol Street, NW
Washington, D.C. 20401-0001

Dear Public Printer Boarman,

We write as coordinators of regional depository libraries to express our deep concern over GPO’s recent responses to two initiatives within the FDLP system. Given these responses, and the rejection of the 2011 Ithaka S+R report (Modeling a Sustainable Future of the Federal Depository Library Program in the 21st Century), we do not believe that GPO recognizes the gravity of the current situation in many regional federal depository libraries, and does not appear to be making efforts to understand this situation or to creatively partner with regional libraries or groups of depository libraries to help ameliorate the situation.

In response to an extremely challenging budget situation in Michigan, the University of Minnesota Libraries and the State Library of Michigan submitted a proposal to allow the University of Minnesota to take over regional responsibilities for the 43 Michigan selectives. Minnesota already has responsibilities for South Dakota selectives. GPO did not accept the proposal. The September 15th response letter included points about distance, governance, and funding issues that we believe were addressed in the proposal.

The ASERL initiative is the second example. While we acknowledge and appreciate GPO’s offer to work with ASERL on its implementation of the Southeast Regional Guidelines of Management and Disposition of Federal Depository Library Collections, several of the issues of concern raised in GPO’s letters of July 20 and September 23 appear to us to be beyond the GPO’s scope. The change in the ASERL Documents Disposition Database in early September to display a state’s discards to the regional as soon as they are posted, together with the Plan’s statements in Section V.4, page 8 affirming the responsibility of the regional and the selectives to consult together on collection development matters, adequately address the primacy of the regional collections. Nothing in the ASERL plan changes current policies in other stated areas of concern - no sale of documents, public access, and the requirement of
regionals to hold tangible formats. We do not understand why these issues were raised by GPO in its response. The final area of concern – oversight of the two Centers of Excellence - is not within GPO's purview since the Centers of Excellence enhance access to government information beyond the mandates of Title 44, and implementation in no way abrogates requirements of the current law.

As you know, libraries, the information delivery environment, and our users' needs are all rapidly changing. Much is in flux, but much is known about this new era. Our users expect information, including government information, to be at their fingertips via their computer or hand-held device. With 97% of the new government information available electronically via the depository system and through the Internet we are doing a good job supplying this demand for instant results. Our users also expect government and other information to be preserved for the future. With the geographically distributed system of regional and selective depository libraries we are addressing that need for printed federal government information.

What the current federal depository library program is not doing a good job of is taking advantage of technology and new collaborations to better serve our users and, at the same time, alleviate some major issues for all depository libraries, and in particular regional depository libraries. The 47 regional federal depositories attempt to have redundant collections. We know that all regionals do not have identical collections, but that's the goal. Administrators and librarians in regional libraries understand the necessity of retaining and preserving multiple, geographically distributed collections of government information, but increasingly they are also saying "but, not in my backyard. We don't have the room or funds." The recent withdrawals of the University of Nevada and the State Library of Michigan as regional federal depository libraries is probably only a bellwether if some flexibility isn't built into the depository system.

GPO's reaction to community initiated proposals (mentioned above) to creatively work within current law to address some pressing concerns is very disappointing, and seems to display a lack of enthusiasm for partnering with depository libraries in forward-looking ways. GPO's recent decision that the University of Minnesota Libraries and the State Library of Michigan proposal requires review and approval by the Joint Committee on Printing, when earlier multi-state agreements were approved as within the 44 USC 1914 is particularly distressing. The current proposal, to provide regional services to Michigan from Minnesota, seems to us quite different from the shared regional proposal addressed by the 2007 CRS opinion. We applaud the Michigan State Librarian's intention to continue to work directly with Senators of the two states to have the University of Minnesota continue its tradition of being a "regional" library meeting the information needs of the public in Minnesota as well as other states. The GPO response to the ASERL plan, and the rejection of the Ithaka S+R report, *Modeling a Sustainable Future of the Federal Depository Library*
Program in the 21st Century, seem to display a lack of enthusiasm for partnering with the community to fashion a workable future for the FDLP.

Regional librarians are dedicated to no-fee, long-term preservation of and access to U.S. government information. We are committed to partnering with one another and with GPO to address the pressing space, time, and monetary concerns that serving as a regional federal depository library engenders. We are dedicated to remaining within the current legal framework or to changing that almost 50 year old legal framework to better serve the public. We strongly encourage GPO to work with us to identify and implement innovative solutions to our challenges. We also ask that GPO reconsider its decision on the Minnesota/Michigan proposal and proactively work with ASERL to address any implementation issues.

Thank you very much for your consideration of our concerns. We look forward to partnering with GPO in developing a 21st century federal depository library program that provides Americans with enhanced access to federal government information and effectively preserves that information for the future.

Sincerely,

Dan Barkely  
University of New Mexico

Charles Bernholz  
University of Nebraska, Lincoln

Stephanie Braunstein  
Louisiana State University

Christina Chang  
West Virginia University

Kirsten Clark  
University of Minnesota

Marie Concannon  
Missouri University

Gregory Curtis  
University of Maine

Lucy Farrow  
Auburn University at Montgomery

Mary Freilich  
University of Memphis

Rita Franks  
Louisiana Tech

Kathy Hale  
State Library of Pennsylvania

Audrey Hall  
State Library of Ohio
Laura Harper
University of Mississippi

Beth Harper
University of Wisconsin

Peggy Jole
University of Colorado, Boulder

Sandee McAninch
University of Kentucky

Marianne Mason
University of Iowa

Carmen Orth-Alfie
University of Kansas

John Phillips
Oklahoma State University

[B] [Digital signature not available]
Blaine Redemer
State Library of Illinois

Tom Rohrig
Texas Tech University

Beth Rowe
University of North Carolina

Barbie Selby
University of Virginia

Gwen Sinclair
University of Hawaii, Manoa

Bill Sudduth
University of South Carolina

Jan Swanbeck
University of Florida

Lori Thornton
Washington State Library

John Walters
Utah State University

Arlene Weible
Oregon State Library

Tanner Wray
University of Maryland
Gail Fithian
Boston Public Library