



## ASSOCIATION OF RESEARCH LIBRARIES

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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  
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Dear Mr. Davis and Ms. Etkin,

This letter is submitted on behalf of the Association of Research Libraries (ARL) regarding the GPO request for information on the conditions of regional Federal Depository Libraries (FDLs). ARL is pleased to provide input to GPO's effort to better understand the environment within which these libraries operate. Twenty-three of the 52 regional FDLs are members of ARL. In addition, the majority of U.S. ARL members are selective FDLs. As a consequence, ARL and its members have extensive knowledge and experience in regional and selective federal depository issues thus are well positioned to speak to the issues raised by the Joint Committee on Printing (JCP).

Soliciting input from the community, evaluating and analyzing data and information concerning the changes in library practices, services, technology trends and user information needs within an extremely short time frame presents a significant challenge to GPO in completing this study. Given the complexity of these issues, ARL hopes that GPO will continue to collect data concerning regional FDLs so that current information is available to GPO, the JCP and others. These will be helpful as all stakeholders consider possible changes to the FDLP structure.

The Depository Library Act of 1962 established the authority for regional FDLs. Library and information services have changed dramatically since that time. The introduction of digital technologies and the Internet have transformed libraries. These technologies have allowed libraries to experiment and develop new services, and importantly, these advances allow libraries to engage in extensive collaboration. Resource sharing programs, sharing of expertise, and cooperative efforts are the hallmark of the library community. Within the FDLP, libraries have participated in in-state and multi-state cooperative initiatives. The

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first shared regional federal depository library was established in 1968 with others following in subsequent years. There are now eight multi-state regional federal depositories and widespread cooperation via selective housing agreements. For example, in Tennessee, FDLs across the state engage in extensive selective housing agreements and in South Carolina, Clemson and the University of South Carolina (USC) have an agreement with the USC Law Library. Such agreements permit libraries to direct resources to selected clientele, better manage space, and acquire needed information.

Regional FDLs seek to build on these successful collaborations for a number of reasons. First, the size of these collections places ever increasing pressures on these libraries. Selective housing agreements have relieved some, but by no means all, of the pressures on FDLs. The use of the tangible collections is diminishing because users prefer electronic access and because most regional libraries lack complete online access to pre-1976 materials. FDLs, in most cases, cannot utilize remote storage facilities for these documents as they lack cataloging records. As more users seek government information in digital formats, FDLs face new fiscal pressures in maintaining the tangible collections while at the same time, investing in staff, technologies and new digital services. ARL believes that resources devoted to maintaining 52 redundant regional legacy collections could be better used by supporting improved access and preservation services for print and digital collections. There would be enormous benefits and enhanced public access through utilization of effective digital services in lieu of maintaining 52 redundant, not fully accessible legacy collections.

There are several key criteria that ARL believes are essential components of successful collaborations between and among regional FDLs.

- **Flexibility:** in order to be pertinent to the diversity of interests, regional FDLs should be given greater latitude in the management of their collections. This would spur new innovative service approaches and permit these libraries to manage their collection in the most effective and efficient manner.
- **Access:** improved bibliographic access to these legacy collections would vastly increase public access to these collections and also relieve some space pressures.
- **Preservation:** FDLs with GPO need to develop and implement a preservation strategy for the tangible collections. New cooperative preservation ventures are needed as maintaining 52 redundant collections is not a viable preservation strategy. At the same time, exploring preservation strategies for the growing digital collections should be undertaken given the fragility of digital resources.

The conclusions of the Congressional Research Service memorandum, "*GPO Authority Over Regional Depository Libraries*," call into question long standing Memorandum of Understanding(s) (MOUs) and collaborative arrangements amongst and between FDLs. Indeed, if taken to its logical conclusion, all selective

housing agreements and shared and multi-state regional FDLs would not be valid as the memorandum states --...that each RDL, in addition to fulfilling the requirements for depository libraries, must "retain at least one copy" of all Government publications..." We encourage GPO to see the necessity of maintaining and building upon existing cooperative initiatives in order for the FDLP to continue to serve the public. ARL believes that the program must support greater resource sharing and cooperative ventures such as the Kansas-Nebraska shared regional proposal in order to be meaningful and fiscally achievable in the years ahead.

Thank you for your consideration of these comments. Please let me know if there is additional information that I can provide

Sincerely,

*Brendan S. Adler*

Associate Executive Director,  
Federal Relations and Information Policy