



ASSOCIATION OF SOUTHEASTERN RESEARCH LIBRARIES

May 13, 2008

Richard G. Davis, Superintendent of Documents  
U.S. Government Printing Office  
Mail Stop: IDCC  
732 N. Capitol Street, NW  
Washington, DC 20401

**RE: ASERL Response to GPO's Request for Information on the Condition of Regional Depositories**

Dear Mr. Davis:

I am happy to provide the following feedback to your request for public comment on the conditions facing Federal Regional Depository Libraries.

As you know, approximately a year ago the Association of Southeastern Research Libraries (ASERL) launched a program within our membership to explore possible options for combining strengths within the Regionals in the Southeast to allow for improved access and services to the public in a manner that would improve sustainability in the long term.

Our exploratory program takes advantage of the experiences of long-standing in-state and multi-state/territory Federal Depository Library Program (FDLP) collaborations within ASERL and other areas of the country. These include the shared Regional process used in South Carolina, and the Regional services provided to the Virgin Islands and Puerto Rico by the University of Florida. There are also numerous other examples of multi-state/territory FDLP programs that are successfully operating today, such as Maryland-Delaware-District of Columbia; Washington-Alaska; Maine-New Hampshire-Vermont; Connecticut-Rhode Island; Minnesota-South Dakota, and Colorado-Wyoming. We believe these shared systems provide important guidance for successful and sustainable operational models for the future.

For us it is clear that today, federal Regional depository libraries – individually and collectively – face great challenges to their ability to deliver effectively a high level of service to the federal Selective depository libraries and the public in their regions. Collaboration is key to strengthening the ties among Regionals, and between Regionals and the Selectives they serve. Formal collaboration among FDLP

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libraries – within single states, and among multiple states – is vital to the future success of the FDLP program as together we respond to the rapidly-changing environment for libraries and information services. Congress and the Government Printing Office (GPO) must encourage and support these collaborations. Specifically, we believe the following four areas to be of key importance in supporting more collaborative Regional depository relationships:

**Access: Support collaborative efforts to catalog Regional depository library collections.**

No Regional depository collection is fully cataloged to the item level with holdings indicated in the national database. This lack of cataloging significantly hinders the ability of the American public to identify and access government publications, thereby defeating much of the purpose of the FDLP. Centrally coordinated, comprehensive cataloging services would greatly strengthen the FDLP by improving public discovery of otherwise-unidentifiable materials.

Regionals are currently attempting to collaborate by sharing information on retrospective cataloging projects in their institutions, but they would greatly benefit from a renewed emphasis on cataloging of these older materials by the federal government. Comprehensive cataloging of Regional depository library collections would also aid the work prescribed in Title 44 Section 1912 – “assistance for depository libraries in the disposal of unwanted Government publications” – thus allowing Regionals and Selectives to use online catalogs to improve resource sharing activities and streamline the disposal of unwanted duplicate copies.

**Preservation: Support collaborative efforts to develop an appropriate amount of redundancy in both tangible and electronic collections.**

The goal of the FDLP is to provide no-fee access to current and historic government information, regardless of format, yet there is no distributed preservation strategy in place for the born-digital materials that increasingly make up the FDLP collection. To ensure that today's electronic government publications are freely available in the future, the GPO should collaborate with FDLP libraries to implement a distributed preservation strategy for electronic materials.

On the other hand, Congress and the GPO have attempted to ensure the long-term survival of tangible government information by distributing multiple copies of all printed or reformatted materials to each of the 53 Regional depository libraries and prescribing that they be retained. However, having a single strategy – wide distribution of multiple copies – will not guarantee preservation of print materials. We have been able by serendipity to keep usable copies of most government publications, but it is critical that GPO collaborate with FDLP libraries to provide a more comprehensive, efficient, and formalized shared preservation strategy for government information.

**Flexibility: Support continued flexibility for Regionals to manage their collections.**

Regional depository libraries must have flexibility in managing their collections. Current technology allows for free and easy information sharing among libraries anywhere in the world. We strongly believe GPO must similarly allow FDLP libraries the option of exploring collaborative collection management partnerships across state and territory lines.

Also, as noted above, the current network of Regional depository libraries is overly redundant. Increasing numbers of federal publications are accessible online from anywhere, lessening the need for public access to tangible collections. We have more print copies of individual government publications than we need either for accessibility or for preservation. Some of the expense used to maintain these many print copies would be better spent providing better cataloging or preservation activities for the items we retain.

This need for flexibility also includes allowing for the continued use of preservation re-formatting to rescue and make accessible older materials. This process is used by many libraries for other, non-FDLP materials, some of which are quite rare. Regionals need to manage their federal depository collections in the same way.

**Standards: Support collaborative efforts to define standards of service for Regional depository libraries.**

There is no standard for evaluating a Regional depository's services. In many cases, services and access to Regional depository resources are dependent on individual librarians and other staff, leading to inconsistencies across institutions as staff and administrators come and go. Positions continue to blur as Regional depository coordinators are increasingly expected to perform other duties that are unrelated to depository operations. This makes education extremely important - both for new Regional depository coordinators and for Regional depository library administrators. Minimum standards should be developed, with input from the GPO, Regionals, and Selectives, and should be outlined in official FDLP documentation. GPO should also regularly host orientation sessions for new Regional depository librarians to introduce new staff to the issues they will face during their tenure.

We realize that participants in the FDLP are self-funded and voluntary, which makes it difficult to impose standards. However, Regional depository libraries and GPO should work toward consistent service across states, so Selectives can know what to expect from their Regionals.

**Summary**

In closing, ASERL libraries are and have been strong and very active supporters of the FDLP program. We clearly support the goals and all-American values espoused by Title 44. However, we believe that this same legislation which restructured the FDLP program - written more than 40 years ago - does not account for the vast service improvements permitted by current-day technologies and the very strong multi-state partnerships that exist between libraries today. We urge GPO to explore avenues that allow FDLP libraries the flexibility to manage their collections in ways that are sustainable given today's technological and financial realities and also improve public access to federal publications.

With thanks for your time and consideration of our input.

Best regards,

A handwritten signature in blue ink, appearing to read "John Burger". The signature is fluid and cursive, with a long vertical stroke on the left side.

John Burger  
Executive Director