

Regional Depository Libraries in the 21st Century: *A Time for Change?*



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Regional Depository Libraries in the 21st Century: A Time for Change?

A REPORT TO THE JOINT COMMITTEE ON PRINTING

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“The Federal Government is publishing a wealth of materials which affect every citizen — businessman, farmer, housewife, scientist, student, and many others. Since enormous amounts are being spent on the studies and research and on the printing and processing of the resulting publications, it is imperative that they be made available economically and efficiently to the people who need them. A sound depository library system designed for modern conditions is required.”

Dan A. Williams, Director,
Public Library of Des Moines, Iowa
Senate Hearing on Depository Libraries
1962

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I. INTRODUCTION

The Federal Depository Library Program (FDLP) operates under the authority and mandates of 44 *United States Code* §§1901-1916. The existing structure of selective and regional depository libraries dates back to the Depository Library Act of 1962, which established regional depository libraries.

Within this statutory framework, different models of sharing resources and responsibilities between regional and selective libraries within the states they serve have been implemented over the years, with Government Printing Office (GPO) approval. These include different models of intra-state sharing between regional and selective libraries, and for sharing of some services between regional depository libraries in one state and selective depository libraries in an adjacent or near-by state where no regional library exists.

In recent years, technological innovations and the online information environment have made it possible for a number of depository libraries to participate in multi-state collaborations for rapid interlibrary loan and other services. Technological innovation and the online environment have also made it possible to develop models for sharing resources and responsibilities between regional depositories in different states and the selective libraries they support.

In September 2007 GPO sent forward a request to the Joint Committee on Printing (JCP) for approval of a proposed shared regional designation between the University of Kansas and the University of Nebraska at Lincoln. While the JCP cannot approve the request¹, there was concern that the Kansas/Nebraska proposal to share resources and responsibilities was a “signal that growing challenges confront regional depository libraries in maintaining and supporting effective public access through the FDLP”.

The JCP directed GPO, in consultation with the library community, to conduct a study of regional depository libraries. The study is to determine the extent to which public access through the FDLP is impaired by current and projected organizational, financial, and technological conditions in regional depository libraries. A report of the findings and any recommended legislative changes to improve the FDLP were to be delivered to the JCP by June 1, 2008.

¹ The JCP cited the Congressional Research Service (CRS) Memorandum of November 6, 2007 to the House Committee on Administration, *GPO Authority Over Regional Depository Libraries*, as the reason they cannot approve GPO’s request. See Appendix A for GPO’s request to the JCP and their response, which includes the CRS Memorandum.

II. BACKGROUND

The Federal Depository Library Program (FDLP) can trace its roots to 1813 when Congress first authorized legislation to ensure that one copy of the House and Senate Journals and other Congressional publications were provided to certain universities, historical societies, and state libraries. No-fee access for the general public to their Government's information is the foundation of the Program. The online environment offers new opportunities as well as new challenges for depository libraries to provide the desired access.

A. Vision and Mission of the Federal Depository Library Program

The vision of the Federal Depository Library Program is to provide Government information when and where you need it.

The mission of the Federal Depository Library Program is to provide for no-fee ready and permanent public access to Federal Government information, now and for future generations. This is achieved through:

- ◆ Organizing processes that enable desired information to be identified and located;
- ◆ Expert assistance rendered by trained professionals in a network of libraries;
- ◆ Collections of publications at a network of libraries; and
- ◆ Archived online information dissemination products from GPO Access, Federal agency Web sites, and partner Web sites.

B. Depository Library Act of 1962

The intent of the Depository Library Act of 1962, codified in 44 United States Code §§ 1901-1916, was to provide for needed expansion in the number of depositories and to improve the procedures and conditions related to the selection, supply, retention and disposal of Government publications distributed to depository libraries for public information.

At the time this legislation was considered there were 594 depository libraries, all of which had to retain all the items they received, unless they were superseded. Not being able to dispose of materials no longer needed was problematic; libraries were running out of shelf space for new publications. Additionally, the Congress wanted to address the lack of depository libraries in some geographic areas that had experienced population growth. With the passage of the Depository Library Act of 1962 (Public Law 87-579):

- ◆ The number of depository libraries designated per Congressional district doubled, from one to two;
- ◆ Libraries of independent Federal agencies became eligible for depository designation;
- ◆ Government publications within the scope of the FDLP was broadened to include publications not printed by GPO;
- ◆ Depositories no longer were required to pay postage for their shipments; and

- ♦ The current structure of selective and regional depository libraries was established.

Regional depository libraries were established for the acquisition and permanent retention of all available Government publications. With regionals in place, other depository libraries (selectives) could dispose of materials after retaining them for five years. With the ability to withdraw materials from their shelves, selective depositories could offer the public a much broader selection of publications, rather than limiting their receipts because of space constraints. Microfiche was seen as the solution to the space problems of regional depository libraries.

Report language indicates that regionals were expected to be in State Libraries and that most states would suffice with one regional depository; larger states such as California would find the need for two regionals.

C. Current Title 44 Statutes Specific to Regional Depository Libraries

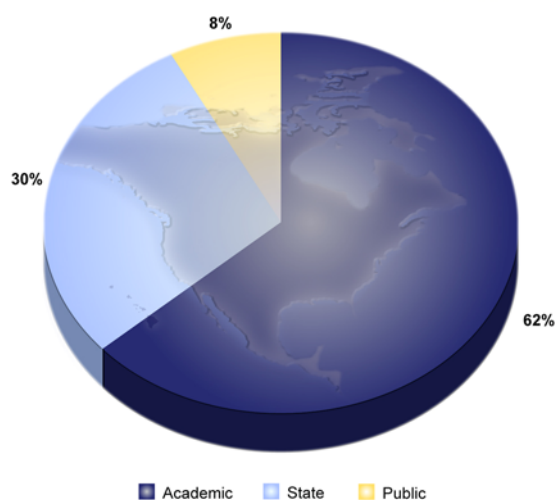
Two sections of Chapter 19 specifically mention regional depository libraries. The requirement for all depository libraries to make Government publications available for the free use by the general public appears in §1911. This same section also requires regional depository libraries to retain Government publications permanently, unless superseded.

Regional depository designation and functions are found in §1912. In accordance with this section, Senators and the Resident Commissioner from Puerto Rico are permitted to designate regional depository libraries and the number of regionals is not to exceed two in each state or the Commonwealth of Puerto Rico. All publications authorized for distribution through the FDLP are to be sent to regionals and must be retained unless superseded. Additionally, §1912 mandates regionals to provide interlibrary loan, reference service, and assistance with the disposition of depository materials to the selective libraries they serve.

D. Regional Scenarios in Place Today

While the legislative intent of the Depository Library Act of 1962 was to have a regional depository in every state and the State Library was to serve as the regional depository, this has not come to pass. Today there are fifty-two regional depository libraries in forty-three states, of which only fifteen are maintained at State Libraries. Four public libraries serve as regional depositories and the balance of thirty-three regionals are located in academic libraries. Six states are served by regionals in other states; the District of Columbia and the territories are served by regionals in states. One state is not served by a regional depository library.

Regional Depositories by Library Type



Within the statutory framework, different arrangements for sharing resources and responsibilities between and among depository libraries have been implemented successfully, with Government Printing Office (GPO) approval. As early as 1966 the University of Maine became the regional depository library for New Hampshire and Vermont, with the support and approval of their Senators. The first shared regionals at the University of North Dakota and North Dakota State University were designated by their Senators in 1968.

Variations of these two models exist today. They include intra-state sharing between regional and selective libraries and the sharing of some services between regional depository libraries in one state and selective depository libraries in an adjacent or near-by state where no regional library exists. See Table 1, Existing Regional Depository Library Models, for details.

E. Transformation of Libraries in the Networked Environment

Much has changed in libraries since the Depository Library Act of 1962. Technological innovations facilitated the evolution of state and regional cooperative networks. Libraries have standardized bibliographic formats and transfer protocols that allow libraries to share catalogs and cataloging records. These same networks provide the infrastructure for rapid interlibrary loan and document delivery.

The more recent online or Web-based environment and the distributive power of information technologies offer libraries an opportunity to provide access to materials they do not own and make available services that meet the high expectations of library users. As libraries are serving more and more users from locations outside the library building, librarians are turning to the online environment for delivery of information and services at the user's point of need. Consortia purchasing of full-text databases, cooperative virtual/chat reference services, and scanning publications for electronic delivery are examples of ways libraries serve their users in a networked environment. These services do not recognize geographic boundaries. With leaner budgets libraries look to collaborative solutions in an increasingly interconnected environment to increase their return on investment.

Table 1: Existing Regional Depository Library Models

Table key

1 regional serving 1 state
2 regionals serving 1 state
1 regional serving multiple states or areas
Shared regional within 1 state
State not served by a regional

State	#	Regionals	# Selectives Served	Area(s) Served	Model
AL	2	Auburn University, Montgomery University of Alabama, Tuscaloosa	20	Alabama	Full regionals
AZ	1	Arizona State Library, Archives & Public Records	13	Arizona	Full regional
AR	1	Arkansas State Library	13	Arkansas	Full regional
CA	1	California State Library	90	California	Full regional
CO	2	University of Colorado, Boulder Denver Public Library	21	Colorado	Full regionals
CT	1	Connecticut State Library	29	CT, RI	Multi-state
FL	1	University of Florida, Gainesville	43	FL, PR, VI	Multi-state
GA	1	University of Georgia, Athens	23	Georgia	Full regional
HI	1	University of Hawaii, Honolulu	12	HI, AS, Guam, Micronesia	Multi-state
ID	1	University of Idaho, Moscow	9	Idaho	Full regional
IL	1	Illinois State Library	50	Illinois	Full regional
IN	1	Indiana State Library	32	Indiana	Full regional
IA	1	University of Iowa, Iowa City	13	Iowa	Full regional
KS	1	University of Kansas, Lawrence	17	Kansas	Full regional
KY	1	University of Kentucky, Lexington	19	Kentucky	Full regional
LA	2	Louisiana State University, Baton Rouge Louisiana Tech University, Ruston	26	Louisiana	Full regionals
ME	1	University of Maine, Orono	25	ME, NH, VT	Multi-state
MD	1	University of Maryland, College Park	63	MD, DE, DC	Multi-state
MA	1	Boston Public Library	28	Massachusetts	Full regional
MI	1	Library of Michigan	43	Michigan	Full regional
MN	1	University of Minnesota, Minneapolis	31	MN, SD	Multi-state
MS	1	University of Mississippi, University	10	Mississippi	Full regional
MO	1	University of Missouri, Columbia	29	Missouri	Full regional
MT	1	University of Montana, Missoula	11	Montana	Full regional

State	#	Regionals	# Selectives Served	Area(s) Served	Model
NE	1	University of Nebraska, Lincoln	14	Nebraska	Full regional
NV	1	University of Nevada, Reno	8	Nevada	Full regional
NJ	1	Newark Public Library	27	New Jersey	Full regional
NM	2	New Mexico State Library University of New Mexico, Albuquerque	9	New Mexico	Full regionals
NY	1	New York State Library	80	New York	Full regional
NC	1	University of North Carolina, Chapel Hill	31	North Carolina	Full regional
ND	2	North Dakota State University, Fargo University of North Dakota, Grand Forks	6	North Dakota	Shared Regional
OH	1	State Library of Ohio	55	Ohio	Full regional
OK	2	Oklahoma Department of Libraries Oklahoma State University	18	Oklahoma	Full regionals
OR	1	State Library of Oregon	19	Oregon	Distributed Collection
PA	1	State Library of Pennsylvania	52	Pennsylvania	Full regional
SC	2	Clemson University University of South Carolina, Columbia	18	South Carolina	Shared Regional
TN	1	University of Memphis	23	Tennessee	Full regional
TX	2	Texas State Library & Archives Texas Tech University, Lubbock	57	Texas	Full regionals
UT	1	Utah State University, Ogden	8	Utah	Full regional
VA	1	University of Virginia, Charlottesville	34	Virginia	Full regional
WA	1	Washington State Library	27	WA, AK	Multi-state
WV	1	West Virginia University, Morgantown	13	West Virginia	Full regional
WI	2	University of Wisconsin, Madison Milwaukee Public Library	21	Wisconsin	Full regionals
WY	Wyoming does not have and is not served by a regional				

Data current as of June 1, 2008.

III. METHODOLOGY

This section details how the data reported in this study were collected and analyzed. An explanation as to how the depository library community was kept informed, and their comments solicited, is provided as well.

The timing of the study allowed GPO to benefit from two major depository events, the Biennial Survey of Depository Libraries and the Spring Meeting of the Depository Library Council (DLC).

The DLC meeting in Kansas City, Missouri, in March 2008, offered the first opportunity to share information about the study and the approach GPO planned to take to produce this report of regional depository libraries. A meeting with regional depository librarians in attendance consisted of a qualitative structured interview that helped determine a strategy for collecting additional data and the feedback obtained was critical in solidifying the framework for the report.

The major source for data about regional depository libraries was the Biennial Survey of Depository Libraries, which was conducted in October 2007. All depository libraries are required to complete this survey to fulfill their statutory mandate to report the conditions of their library every two years to the Superintendent of Documents (44 USC §1909). Approximately 1,200 of the 1,257 Federal depositories submitted the survey in accordance with the deadline for responses; two regionals did not submit the survey. Data from this survey were compared to results from the 2003 and 2005 surveys to determine trends.

In April, 2008, GPO sent a letter to regional depository library directors that informed them of the study and requested their assistance in providing additional data that would help determine the direction and future trends of regional depositories. This included a request for strategic plans, library task force reports, or other planning documentation they thought might be useful. A brief survey also was included with the letter. Fifty-two surveys were submitted to GPO, a response rate of one-hundred per cent. Additionally, a similar letter was sent to selective depository library directors in April, 2008, that informed them of the study and encouraged them to submit comments to GPO. To reach the entire Federal depository library community, GPO posted a message on the FDLP-L listserv announcing this study, the methodology, and soliciting comments. FDLP-L is the official notification service for the Federal Depository Library Program and has nearly 2,000 subscribers.

Additional data sources used to prepare this report included the annual surveys from the Institute of Museum and Library Services: *State Library Agencies* and *Public Libraries in the United States* as well as the biennial survey from the National Center for Education Statistics: *Academic Libraries*. Finally, other reports used as reference sources included *The State of America's Libraries: A Report from the American Library Association*, (April 2008), *OCLC Environmental Scan: Pattern Recognition* (2003), and the Office of Management and Budget's *FY 2007 Report to Congress on Implementation of the E-Government Act of 2002* (March 2008).

Throughout this process, GPO worked to ensure transparency with the Federal depository library community and interested observers. A Web page was established on the FDLP Desktop at <http://www.fdlp.gov/regionals/study.html>. Draft sections of the report were made available as soon as they were completed. To gather additional feedback GPO provided a Web form for comments, which were taken into consideration in preparing the final version of this report.

All the data were taken together and analyzed, and the narrative information provided in this report is fully supported by the data gathered by GPO, both qualitatively and quantitatively.

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IV. RESULTS & DISCUSSION: STATE OF REGIONAL DEPOSITORIES

Regional depository libraries are located in different types of libraries. Of the fifty-two regionals four are in public libraries, fifteen are in state library agencies, and the remaining thirty-three are part of academic libraries. This diverse composition is a strength of the Federal Depository Library Program (FDLP). It also means the libraries have different missions, have different sources of funding, operate under different reporting structures, have different primary clientele they serve, and staff may have varying responsibilities.

The basis of the following standard library descriptions originate from the ANSI/NISO Z39.7-2004: Information and Services Use: Metrics & statistics for libraries and information providers – Data Dictionary²:

ACADEMIC LIBRARY: A library forming an integral part of a college, university, or other academic institution for postsecondary education, organized and administered to meet the needs of students, faculty, and affiliated staff of the institution. An academic library's population may include undergraduate and graduate students as well as faculty.

PUBLIC LIBRARY: A library that serves all residents of a given community, district, or region, and (typically) receives its financial support, in whole or part, from public funds. Public libraries make their basic collections and services available to the population of their legal service area without charges to individual users. Products and services beyond the library's basic services may or may not be provided to the public, with or without individual charges. Individual charges may be assessed to library users outside the legal service area of the library. In addition to including the tax-supported municipal, county, and regional public libraries, this definition includes privately- and federally-controlled libraries governed by single board of trustees or other authority, and administered by a single director. Examples of public libraries include:

- ◆ A city library with its branches
- ◆ A county, multi-county, or regional library with outlets functioning as branches.

STATE LIBRARY AGENCY: A State Library Agency is the official agency of a State charged by the law of that State with the extension and development of public library services throughout the State, and has adequate authority under the law of the State to administer State plans in accordance with the provisions of the Library Services and Technology Act. Additionally, they are involved in the development and operation of electronic information networks, provide information services for state agencies, administer state libraries and other special operations like state documents programs or archives, and they may serve as a public library that provides information services to the general public.

In addition to supporting institutional and library missions and goals, these libraries also are obligated to fulfill their responsibilities as regional depository libraries. They are required to

² ANSI is the American National Standards Institute. NISO is the National Information Standards Organization and it “identifies develops, maintains, and publishes technical standards to manage information”. NISO is accredited by ANSI. NISO also is officially designated by ANSI to represent the United States on the International Organization for Standardization’s Technical Committee on Information and Documentation [<http://www.niso.org>].

provide no-fee public access to the Government information dissemination products, retain all publications permanently in either paper or microfacsimile, and support and assist the selectives in the region they serve with interlibrary loan, reference services, and the disposal of unwanted Government publications. Over the years, and in accordance with guidelines developed by the depository community, regionals expanded their services to selectives to include activities such as training, site visits, consultation, microfiche reproduction, and other services.

A. Current Conditions in Regional Depository Libraries

In addition to the comments GPO received, the results of the 2003, 2005, and 2007 Biennial Survey of Depository Libraries were used to determine the current conditions of regional depository libraries. All depository libraries are required to submit this survey in order to meet their statutory obligation to “report to the Superintendent of Documents at least every two years concerning their condition”. There were fifty-three regionals in 2003, fifty-two in 2005 and 2007. Two regionals did not submit the survey in 2007.

Organizational Conditions. Library administrators are rethinking the way their libraries provide service and how the building’s square footage is used. Depository operations are competing for limited funds and space that is also needed for users, staff, computers, and other collections. Multiple service desks within a library are disappearing in favor of one centralized service point and more space is devoted to information commons or knowledge centers.

The 2007 Biennial Survey revealed that 47 out of the 50 regional respondents saw a decrease or static number of librarians in depository operations over the last five years. Depository staff in 78% of regionals is training staff throughout the library about reference sources and services for Government information. This is critical as depositories are also reorganizing; a majority (58%) of regionals has integrated their service desk with that of the library’s main reference area and most depository librarians are no longer responsible for only depository operations. Cross-training activities leverage shrinking staff resources and enhance public service to users. Yet the regional librarians, in the joint perspective³ they submitted to GPO, reported that this leads to a “generalist” approach to service and in-depth expertise diminishes over time with retirements and downsizing.

Since 2005, 47% of regional depositories experienced construction, renovation, or relocation. The percentage of regional depositories that maintain materials in remote storage (56%) remained consistent from 2005 to 2007; no



When lined up, materials in a 100 year old regional depository stretch six miles or slightly farther than the distance from the U.S. Senate Library to Reagan National Airport.

³ See *Regional Depository Libraries in the 21st Century: Regional Depository Librarians’ Perspective* and other regional study comments submitted to GPO in Appendix C of this report.

remote storage data were collected in 2003. Through selective housing agreements, depository materials are often located at another site in order to better meet individual patron needs. The 2007 survey results indicate that 34% of regional depositories are placing materials in one or more selective housing sites.

Regardless of the construction and renovation activities in regionals, there are some regionals operating with very little space in the library and with full remote storage facilities as well. Others report the potential availability of remote storage for legacy collections of depository materials. This raises an additional dilemma, however. Before materials are placed in remote storage libraries are cataloging the materials; they are ensuring there is a record in their online catalog that indicates the library holds a particular title and where it is located. This is a costly (estimated at \$5 per record) and multi-year process. GPO and thirty-five regionals are cataloging 2.2 million pre-1976 depository publications. In the meantime the lack of records in library online catalogs for these publications is an obstacle to public access to the large historical collections maintained by regional depository libraries and a barrier to possible space solutions.

Financial Conditions. Not all regional depository libraries are experiencing budgetary constraints, though they are the minority. The slowing economy is taking its toll on regional libraries. One director stated, “A static budget would be a welcome one. Instead our budget is declining.” Some states are facing cuts anywhere from 6-15% over each of the next two years.

“Regional depository services, around the nation, have always been of uneven quantity and quality.”

A State Librarian attributes the uneven quantity and quality of regional depository services, in part, to funding inequalities. The uneven numbers of selectives served and geographical areas covered also play a role. For example, California has one regional depository library and ninety selective depositories to serve an area of almost 156,000 square miles and an estimated 2006 population of 36,457,550. South Carolina has two shared regionals and nineteen selectives to serve an area of

almost 30,110 square miles and an estimated 2006 population of 4,321,250. This is not what the depository reformers envisioned in 1962. Many regional depository librarians cannot afford to visit their selectives or provide support services to them.

Thirty-seven regionals, or 72.5%, disagree or strongly disagree that financial support to cover the costs of depository operations continues to increase. The return on investment for regional libraries to store, maintain, and preserve their tangible legacy collections has diminished as some libraries report institutional costs of more than \$1,000,000 a year to support their regional depository operation. Fiscal issues coupled with interconnected networks and innovations in the delivery of services compel libraries to rethink the services provide and how they provide them. Additionally, they are reexamining how the library is used. Collaboration is needed to meet these challenges.

Technological Conditions. Technologically, the regionals are faring well. Forty-eight of fifty-two, or 92.3%, of regional depositories agree or strongly agree that the library has an adequate number of computers for use by the public and 85% meet GPO's minimum technical requirements for public access workstations. Internet filtering software is employed by 26% of regionals, with most being able to turn the filter off if requested to do so by researchers, and 52% require no user authentication to log in. All regionals provide records in their online catalogs for current depository receipts and 100% also include hyperlinks in records to online information dissemination products that direct users to the full-text. The users are following the links. GPO tracks, for the depository libraries, how many users they refer to online publications from their online catalog records through GPO's persistent uniform resource locator (PURL) server. For those regionals that have participated in the tracking from 2001-2006, there was a 483% increase in PURL referrals.

Regional depository librarians are cooperating with selective depository librarians to deliver Web-based training in the use of government information. Government Information in the 21st Century (Gi21), an Institute of Museum and Library Services (IMLS) funded project, is a continuing education program that delivers training in the use of electronic government information for those who provide reference services. Fifty government information professionals from Federal depository libraries in Arizona, Colorado, New Mexico, Utah, and Wyoming are available as trainers.

GPO procured and is using OPAL – Online Programming for All Libraries to conduct Web-based training for the depository library community. Recently GPO opened up its virtual classroom to depository librarians so that they can share their expertise with others.

In 2005, 71% of regionals indicated an interest in participating in a national collaborative virtual reference service. After a successful pilot project, Government Information Online: Ask a Librarian (GIO) was launched in February 2008. At present there are twenty-two depository libraries, seven of which are regionals, that contribute to the GIO/GPO service partnership to provide chat and e-mail reference service and delivery of digitized or born-digital content.

Web-based training and virtual reference service are only two examples of how depositories are harnessing the power of the Internet to provide collaborative solutions to deliver Government information services at the user's online point of need. User searching behavior has changed; more and more people prefer to research from home, work, or the local coffee shop with wifi.

While the migration to electronic deliverables and online databases saves on shelf space for collections and provides access to data that can be manipulated, there is a trade-off. Instead of purchasing microfiche reader/printers and cabinets, libraries must acquire and maintain "robust" computer workstations, laser printers, software upgrades, storage cabinets for CD-ROMs and diskettes, Internet connections, etc. Staff training is necessarily more complicated as is the need to assist patrons with electronic access services. Historic information may only be available in optical disk storage or floppy disks whose time has come and gone.

Effect on Selective Depository Libraries. Many of the comments GPO received for this study from selective depositories were very supportive and complimentary of their regional. They are grateful for their regional providing training and meeting opportunities, facilitating communication among the region, and responding to queries in a timely manner. There was, however, an overwhelming number of comments complaining about the disposition of materials process, which is managed by regionals per 44 USC §1912. The turn around time for regionals to grant their approval to withdraw depository materials is exceedingly long. Selectives are withdrawing tangible materials and replacing them with access to online versions to meet the needs of their users and to help alleviate space problems. Regionals are having difficulties processing the increasing number of requests. GPO recognizes this is an issue that needs further investigation, discussion, and collaboration with the Federal depository library community to solve.

According to comments GPO received, not all regionals are meeting the needs of their selective depository libraries. It was reported that some regionals never, or very rarely, communicate with their selectives and they are unresponsive to requests for assistance. This is often attributed to the regional depository librarian being too far extended with other responsibilities.

Several selectives also expressed concern for how impending reorganizations and staff decreases at their regionals might affect them. Some indicated a fear that existing problems, such as the disposition process, will only be compounded.

B. Projected Conditions in Regional Depository Libraries

To project the conditions in regional depository libraries the directors/deans were asked to complete a five-level Likert items survey. The response rate to this survey was 100%. See Appendix B for a summary of the results and the comments that were included. Additionally, strategic planning documents⁴ of libraries and their parent institutions were examined to determine future directions. Of the fifty-two libraries that are regional depositories, thirty-seven or 71%, have some form of strategic planning document. Of those, only fifteen specifically addressed the depository operations in their documentation. Thirty-six or 69% of parent institutions have planning documents.

The strategic planning documents revealed several common trends, regardless of library type. Libraries are:

- ◆ Improving and increasing access to both physical and virtual information resources;
- ◆ Blending tangible and electronic information access as well as emphasizing physical and virtual service in the use of those resources;

⁴ For the purpose of this study, strategic planning documents were liberally defined as any written publication that provided information regarding the future direction of the organization. This included documents such as strategic plans, vision documents, five-year plans, annual reports, goal-setting documents, or mission statements. This broad definition accommodated the variation in terminology used by organizations in naming strategic publications.

- ◆ Highlighting specialized collections and services unique to their library;
- ◆ Assessing, identifying, and responding to end-user information needs;
- ◆ Integrating the library into the environment where end-users live, work, study, and research – providing point of need services;
- ◆ Participating in collaborative relationships such as partnerships to share resources (physical and virtual), including space and staff; and
- ◆ Addressing the change in knowledge, skills, and abilities necessary for library employees by training existing staff or hiring additional staff with appropriate skills.

Results of the survey of regional library directors/deans that GPO conducted in April 2008 depict a future that maximizes the use of information and service delivery networks and collaborative solutions. The results also reveal a commitment to the ideal of public access to Government information and a desire to make the content of their tangible legacy collection accessible.

The budget outlook for the next three to five years is not promising for 78.9% of regional depositories. Ten libraries, or almost 20%, agree or strongly agree that they are considering relinquishing their regional designation and becoming a selective depository. Yet, 27.4% or fourteen regionals would consider serving as a regional for selective depositories in a neighboring state. In fact seven already serve in such a capacity. Another nine regionals are neutral on this issue.

In some respects staffing in regional depositories does not appear to be a problem; 60% agree or strongly agree there is enough professional staff and almost 65% agree or strongly agree there is enough support staff to support the regional depository operation. But, twenty-four regionals, less than half, agree or strongly agree there is enough staff to support their regional responsibilities to their selectives. As mentioned above, according to comments, staffing is a concern of the selectives they serve.

The survey indicates that there is not a perceived space problem in regionals for the next five years; 62.8% have room for print materials and 68.6% have room for microfiche. Additionally, 80.4% agree or strongly agree that a primarily online FDLP has expanded service opportunities and 88.2% agree or strongly agree that participation in statewide and regional consortia allows increased services to the people of the region.

While 53% of regionals agree or strongly agree that they would like to be as “virtual” as possible were it an option, comments indicate that in some instances this would not be to replace the tangible collection but rather to provide another means of access to the content. Almost half (48%) of the regional depository libraries are digitizing, or are developing plans to digitize, depository materials locally or through partnerships and 52% are willing to receive FDLP access derivative digital files on deposit.

Cataloging and preservation of the legacy collection is paramount to providing the level of access desired by regional depository libraries. New ways of collaboration are needed to meet these challenges.

DRAFT

V. TITLE 44 AND REGIONAL DEPOSITORY LIBRARIES

The Federal Depository Library Program operates under the authority and mandates of 44 United States Code, §§1901-1916. Regional depository libraries are addressed in §§1911-1912,

A. Legacy Sections of Title 44, Chapter 19 Related to Regional Depository Libraries

§1911. Free use of Government publications in depositories; disposal of unwanted publications

Depository libraries shall make Government publications available for the free use of the general public, and may dispose of them after retention for five years under section 1912 of this title, if the depository library is served by a regional depository library. Depository libraries not served by a regional depository library, or that are regional depository libraries themselves, shall retain Government publications permanently in either printed form or in microfacsimile form, except superseded publications or those issued later in bound form which may be discarded as authorized by the Superintendent of Documents.

§1912. Regional depositories; designation; functions; disposal of publications

Not more than two depository libraries in each State and the Commonwealth of Puerto Rico may be designated as regional depositories, and shall receive from the Superintendent of Documents copies of all new and revised Government publications authorized for distribution to depository libraries. Designation of regional depository libraries may be made by a Senator or the Resident Commissioner from Puerto Rico within the areas served by them, after approval by the head of the library authority of the State or the Commonwealth of Puerto Rico, as the case may be, who shall first ascertain from the head of the library to be so designated that the library will, in addition to fulfilling the requirements for depository libraries, retain at least one copy of all Government publications either in printed or microfacsimile form (except those authorized to be discarded by the Superintendent of Documents); and within the region served will provide interlibrary loan, reference service, and assistance for depository libraries in the disposal of unwanted Government publications. The agreement to function as a regional depository library shall be transmitted to the Superintendent of Documents by the Senator or the Resident Commissioner from Puerto Rico when the designation is made.

The libraries designated as regional depositories may permit depository libraries, within the areas served by them, to dispose of Government publications which they have retained for five years after first offering them to other depository libraries within their area, then to other libraries.

B. Previous Efforts to Revise Title 44, Chapter 19

The last major change to Title 44 that affected depository libraries was Public Law 103-40, The Government Printing Office Electronic Information Access Enhancement Act of 1993, more commonly known as The GPO Access Act. The implementation of the GPO Access Act ushered GPO into the online age and accelerated the paradigm shift in the FDLP that

changed GPO's relationship with depository libraries. Regional depositories have the responsibility for permanent public access in the tangible publication environment. In the online information environment GPO has assumed primary responsibility for ensuring content and permanent public access. Depository libraries, particularly regionals, face challenges providing access to and delivering Government information to library users while continuing to maintain and preserve legacy collections of tangible depository resources for permanent availability.

Since 1993, attempts were made to update Chapter 19, Depository Library Program, to no avail. Additionally, the library community identified alternatives for restructuring the FDLP in the online information environment that required changes to Chapter 19 to implement. The following represent these efforts:

- ♦ Depository Library Council. *Alternatives For Restructuring The Depository Library Program: a Report to the Superintendent of Documents and the Public Printer from the Depository Library Council* (September 1993).
- ♦ Dupont Circle Group. Chicago Conference Coordinating Committee. *Reinventing Access to Federal Government Information: Report of the Conference on the Future of Federal Government Information* (October 1993).
- ♦ U.S. Government Printing Office. *Study to Identify Measures Necessary for a Successful Transition to a More Electronic Federal Depository Library Program As Required by Legislative Branch Appropriations Act, 1996 Public Law 104-53* (June 1996).
- ♦ Inter-Association Working Group on Government Information Policy. *Goals for Revising U.S.C. Title 44 to Enhance Public Access to Federal Government Information* (May 1997).
- ♦ Joint Committee on Printing. Eric Peterson. *Concepts for Reform of Title 44* (September 1997).
- ♦ Inter-Association Working Group on Government Information Policy. *Federal Information Access Program Act of 1998*. Draft bill to amend Chapter 19 of Title 44, United States Code transmitted to The Honorable John W. Warner, Chairman, Committee on Rules and Administration. (March 1998).
- ♦ U.S. Congress. Senate. *A bill to provide for the reform and continuing legislative oversight of the production, procurement, dissemination, and permanent public access of the Government's publications, and for other purposes*. 105th Cong., 2nd Sess. S. 2288 (Reported in the Senate).
- ♦ Depository Library Council. *Knowledge Will Forever Govern: A Vision Statement for Federal Depository Libraries in the 21st Century*. Final Version (September 29, 2006).

We were forewarned about the provisions of the structure created by the Depository Library Act of 1962. In his March 15, 1962 testimony at a hearing on depository libraries before the

Subcommittee on the Library of the Committee on Rules and Administration, Dr. Benjamin Powell, the Librarian of Duke University, stated:

Any legislation geared to districts rather than population will not provide enough expansion to keep abreast of demand during the next quarter or half century. This bill lacks an expansive feature. An amendment which would permit Senators to designate additional depositories according to a population formula would make this legislation serve the country for many decades.

Thirty-one years passed between the implementation of the Depository Library Act of 1962 and the Depository Library Council's *Alternatives For Restructuring The Depository Library Program* report of 1993.

While the GPO Access Act and the movement to a primarily electronic FDLP created many opportunities to enhance access and services to Government information dissemination products, there have not been corresponding revisions to Chapter 19 to provide regional and selective depository libraries the flexibility required to operate in an online and networked environment. Chapter 19 needs “*an expansive feature*”.

VI. CONCLUSIONS AND RECOMMENDATIONS

This study was undertaken at the request of the JCP to determine the extent to which public access via the FDLP may be impaired by current or projected organizational, financial, technological, or other conditions affecting regional depository libraries.

Regional Depository Libraries in the 21st Century: A Time for Change? Yes, it is time for a change. Libraries and the world around them have changed radically in the forty-six years since the Depository Library Act of 1962 was passed. “A sound depository library system designed for modern conditions is required.”

The regional structure in place today is not what the depository reformers envisioned in 1962. Regional depository libraries, and the selective depositories they serve, are located in different types and sizes of libraries; they are geographically dispersed; service areas vary greatly in size and population; and in addition to meeting the mandates of the FDLP, they must also work within the influences of their unique local environment.

Analysis of the results of the *Biennial Survey of Depository Libraries*, and the *Regional Depository Library Survey, April 2008*, and review of comments from the library community reveal that current and projected conditions of regional depositories differ from library to library. Key findings about regional depository libraries include:

- ◆ Regional depositories are committed to the ideal of public access to Government information and value the FDLP legacy collections they maintain.
- ◆ 100% provide records in their online catalogs for current depository receipts and 100% also include hyperlinks in records to online information dissemination products that direct users to the full-text;
- ◆ 35 libraries and GPO are cataloging 2.2 million pre-1976 depository publications. This, however, is a costly (estimated at \$5 per record) and multi-year process and should be a coordinated cooperative effort. In the meantime the lack of records in library online catalogs for these publications is an obstacle to public access to the large historical collections maintained by regional depository libraries;
- ◆ 80.4% agree or strongly agree that a primarily online FDLP has expanded service opportunities and 88.2% agree or strongly agree that participation in statewide and regional consortia allows increased services to the people of the region;
- ◆ 48% are digitizing, or developing plans to digitize, depository materials locally or through partnerships and 52% are willing to receive FDLP access derivative files on deposit;
- ◆ 92.3% agree or strongly agree that the library has an adequate number of computers for use by the public, 85% meet the minimum technical requirements for public access workstations, 26% employ filtering software, and 52% require no user authentication to log in;

- ◆ Depository operations are competing for limited funds and space that is also needed for users, staff, computers, and other collections;
- ◆ Libraries are rethinking how they provide service; 58% have integrated services for depository users with the library's main reference desk, 94% reported a decrease or static number of librarians working in depository operations over the last five years, and most depository librarians are no longer responsible for only depository operations;
- ◆ 62.8% agree or strongly agree that they have sufficient space for print publications for the next five years and 56% house depository materials in remote storage facilities;
- ◆ 27.4% would consider serving as a regional for selective depositories in a neighboring state and another 17.6% are neutral on this issue;
- ◆ 78.9% disagree or strongly disagree that their funding outlook for the next 3-5 years is promising;
- ◆ The return on investment for regional libraries to store, maintain, and preserve their tangible legacy collections has diminished as some libraries report institutional costs of more than \$1,000,000 a year to support their regional depository operation;
- ◆ 10 libraries are considering relinquishing their regional designation;
- ◆ The condition of publications within the legacy collections housed in regional depository libraries prohibits access. The deterioration of materials over time from acidic paper, degrading microfiche, lack of preservation-level climate controls in libraries, and decades of normal use has resulted in some materials being too fragile for use;
- ◆ Collaboration is needed to meet the challenges of cataloging, storing, preserving, and digitizing the legacy collection of depository materials;
- ◆ Chapter 19 of Title 44 must be revised to allow a more flexible structure that permits regional depository libraries to operate more effectively at the local level by using cooperative networks, with the ultimate result of better serving the public and their selective depository libraries;
- ◆ GPO recognizes that the disposition of materials process is challenging for both regional and selective depository libraries. This needs further investigation, discussion, and collaboration with the Federal depository library community; and
- ◆ The time frame allotted for this study allowed only a cursory look at regional depository libraries to identify issues affecting and problems facing them.

A network of diverse libraries with varying needs, like the designated regionals in the FDLP, requires flexibility and collaboration such as is afforded Federal agencies through e-government initiatives. Among the purposes identified by Congress for passing the E-Government Act of 2002 are, “to promote interagency collaboration in providing electronic services where this collaboration would improve the service to citizens ... where this collaboration would improve the efficiency and effectiveness ...” and to “promote access to high quality Government information and services across multiple channels.”

As stated by the Office of Management and Budget in *FY 2007 Report to Congress on Implementation of the E-Government Act of 2002*, “the use of information technology to provide consistent access to and dissemination of government information is essential to promote a more citizen-centered government in a cost-effective manner.” The current framework of regional depositories exists within a structure designed more than forty-five years ago prior to the creation of statewide and regional consortia for resource sharing and prior to the development of information delivery networks.

For more than fifteen years the depository library community has explored alternative structures for the FDLP. In today’s environment where geographic boundaries are a blur to services, who better to determine how to deliver government information to meet the needs of a region than the depository libraries that serve it? Libraries are improving and increasing access to tangible and virtual information resources by digitizing collections; providing point of need services; and participating in collaborative relationships to share personnel, space, and services. To move forward in the 21st century, regional libraries also must be able to apply these options to their depository collections.

To ensure regional depository libraries are able to provide unimpaired access to Government information dissemination products for future generations, GPO recommends:

- ◆ Continuing and increasing appropriations for GPO’s initiative to create machine-readable bibliographic records for the legacy collection of pre-1976 depository publications to ensure its completion in a timelier manner.
- ◆ Revising Chapter 19 of Title 44 to allow a more flexible structure within the parameters of the, already library community-accepted, *Guidelines For Establishing Shared Regional Depository Libraries*⁵.
- ◆ Approving the Kansas/Nebraska shared regional proposal. GPO is positioned to approve intrastate proposals and wants to continue to bring new multi-state proposals that meet the criteria in the *Guidelines For Establishing Shared Regional Depository Libraries*, forward to the JCP for consideration.
- ◆ Making funds available to regional depository libraries to help offset the costs of storing and preserving government property and the costs that are shifted from agencies to libraries as an unintended consequence of technology (an unfunded mandate).
- ◆ Continuing the dialog between GPO and the depository community about the outcomes of this study and to undertake a more in-depth look at the organizational, financial, and technological issues affecting the FDLP in its entirety, not just the regional depository libraries. Further discussion of scenarios for a flexible future are needed to gain consensus for driving Title 44 revisions.

⁵ These Guidelines were written at the request of the depository library community and, after much discussion, became effective in August 2007. They are available at <<http://www.fdlp.gov/regionals/guidelines.html>> and as Appendix D of this report.

VII. REFERENCES

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VIII. APPENDICES

A. GPO AND JCP CORRESPONDENCE RE: SHARED REGIONALS

Letter from Acting Public Printer William Turri to the Honorable Robert Brady, Chairman, Joint Committee on Printing, September 13, 2007 seeking approval of the Kansas/Nebraska shared regional depository library proposal

Letter from the Honorable Robert Brady, Chairman, Joint Committee on Printing to Honorable Robert Tapella, Public Printer of the U.S., February 27, 2008. In response to Mr. Turri's letter of September 13, 2007

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B. REGIONAL DEPOSITORY LIBRARY SURVEY, APRIL 2008

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C. COMMENTS FROM THE FEDERAL DEPOSITORY LIBRARY COMMUNITY

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Letters from Library Associations

D. GUIDELINES

Establishing Shared Regional Depository Libraries

APPENDIX A:

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September 13, 2007

The Honorable Robert A. Brady
Chairman
Joint Committee on Printing
1309 Longworth House Office Building
Washington, DC 20515

Dear Mr. Chairman:

This is to request the approval of the Joint Committee on Printing to designate the regional Federal depository libraries at the University of Kansas and the University of Nebraska as shared regional depository libraries. In GPO's view, so designating these libraries will allow them to consolidate collections and reallocate resources to achieve operational efficiencies, giving the libraries a practical and economical means for providing public access in the areas they serve.

Our request to the Committee is based on a request submitted to GPO jointly by the Honorable Pat Roberts, U.S.S., and the Honorable Ben Nelson, U.S.S., a copy of which is enclosed. This is the first instance of a request for a formal designation of shared regional depository libraries between two or more States, as opposed to designation of a regional depository library within a State as prescribed by 44 U.S.C. 1912, and GPO is aware of discussions within the library community for additional designations.

To properly evaluate all such requests, and to ensure that any designations of shared regional depository libraries comport with all applicable provisions of the Federal Depository Library Program under the provisions of chapter 19 of Title 44, U.S.C., GPO developed a set of *Guidelines for Establishing Shared Regional Depository Libraries*. The *Guidelines* were put out for comment by the depository library community, revised as appropriate, and a final version was released August 28, 2007; the reaction within the community to the final version has been supportive. Subsequently, GPO determined that the proposal for involving the Kansas and Nebraska regional depository libraries fully meets the standards set forth in the *Guidelines*.

Pursuant to 44 U.S.C. 1914, which permits the Public Printer, with the approval of the Committee, to "use any measures he considers necessary for the economical and practical implementation of [chapter 19 of Title 44, U.S.C.]," I respectfully request the

The Honorable Robert A. Brady – Page 2

Committee's approval to designate the libraries at the University of Kansas and the University of Nebraska as shared regional depository libraries. If you need additional information, please do not hesitate to contact GPO's Director of Congressional Relations, Mr. Andrew Sherman, on 202-512-1991, or by email at asherman@gpo.gov.

Sincerely,



WILLIAM H. TURRI
Acting Public Printer

Enclosure

United States Senate
WASHINGTON, DC 20510

March 30, 2007

Mr. Richard Davis
Acting Superintendent of Documents
U.S. Government Printing Office
Rm. C730
Washington, DC 20402

Dear Mr. Davis:

We write to you at the request of the University of Kansas and the University of Nebraska-Lincoln who have developed a proposal for creating a joint regional depository collection for government documents at their libraries. We understand that the two library deans discussed this proposal with you on February 27. By establishing a joint regional depository collection, the two universities will be able to consolidate collections and reallocate resources to provide cost-effective services to the citizens of our states. The universities have signed a memorandum of understanding outlining how they will provide a joint regional depository collection. Supporting documentation from the State Libraries of Kansas and of Nebraska and from the government document community has been submitted to the Government Printing Office.

We strongly support this request for designation of a joint regional depository library collection for Kansas and Nebraska per 44 U.S.C. § 1912 (1991). As this is the first request for designation of a regional federal depository library between two states, any guidance you can provide on how the universities should proceed will be appreciated. Thank you for your consideration.

Sincerely,



Pat Roberts
United States Senate



Ben Nelson
United States Senate

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Congress of the United States
Joint Committee on Printing
WASHINGTON, D.C. 20515 - 6157

February 27, 2008

The Honorable Robert Tapella
Public Printer
U.S. Government Printing Office
Washington, D.C.

Dear Mr. Tapella:

Thank you for Acting Public Printer William Turri's letter of September 13, 2007, requesting the approval of the Joint Committee on Printing (JCP) for designation of the regional depository libraries at the University of Kansas and the University of Nebraska as "shared" Federal regional depository libraries.

As Mr. Turri's letter notes, the underlying request from the two Federal regional depository libraries operating in different states presents the first formal request from regional depositories in different states to share collections and to serve depository libraries across state lines. The statute authorizing regional depository libraries (44 U.S.C. 1912) does not contemplate regional depositories sharing collections and serving depository libraries outside their borders. Consequently, the instant request asks the JCP to approve the Public Printer's expansion of the regional depository library program across state lines under the statute (44 U.S.C. 1914) granting the Public Printer flexibility in the "implementation" of the program subject to JCP approval.

While Congress has given the Joint Committee broad authority over operations of the Government Printing Office (GPO), which administers the Federal Depository Library Program (FDLP), that authority has limits. Before considering GPO's request on the merits, the JCP must determine whether the authority granted to the Public Printer and the JCP by 44 U.S.C. 1914 encompasses programmatic change of the magnitude sought here. For guidance, the Joint Committee consulted the American Law Division of the Congressional Research Service (CRS), Library of Congress, for its opinion, a copy of which is enclosed.

As you will note, CRS concluded that neither the language nor legislative history of 44 U.S.C. 1914 supports GPO's interpretation of the statute. After careful review, the Joint Committee finds the CRS analysis persuasive; if the Public Printer may not authorize shared regional depository libraries under 44 U.S.C. 1914, the JCP cannot approve such action.

Although the Joint Committee cannot approve the Public Printer's request, it is nonetheless concerned that this request to share resources and responsibilities may signal that growing challenges confront regional depository libraries in maintaining and supporting effective public access through the FDLP. Accordingly, the Joint Committee directs you, in consultation with all concerned elements of the library community, to undertake a thorough examination of the current state of regional depository libraries nationwide. The purpose of the study will be to evaluate the extent to which public access via the FDLP may be impaired by current or projected organizational, financial, technological, or other conditions affecting these institutions. You are further directed to provide the Joint Committee with your findings on or before June 1, 2008, together with any legislative recommendations for improvements to the program that you may choose to offer.

Sincerely,



ROBERT A. BRADY
Chairman

Enclosure

CC: All Members, Joint Committee on Printing
The Honorable Ben Nelson
The Honorable Pat Robert



Memorandum

November 6, 2007

TO: House Committee on Administration
Attention: Michael Harrison

FROM: T.J. Halstead
Legislative Attorney
American Law Division

SUBJECT: GPO Authority Over Regional Depository Libraries

Pursuant to your request, this memorandum provides an overview of statutory provisions governing the establishment and operation of Regional Depository Libraries (RDLs), with a focus on the degree to which the Public Printer of the Government Printing Office (GPO) may direct and control their activities.

While congressional information has been distributed to libraries pursuant to federal law since the early 1800's, the modern structure of the federal depository library system was established by the Depository Library Act of 1962.¹ Currently codified at 44 U.S.C. §§ 1901-1916,² the Depository Library Program establishes generally that government publications are to be made available to depository libraries through the facilities of the Superintendent of Documents of the GPO,³ and that depository libraries must make these publications available for the free use of the general public.⁴ While depository libraries had been in existence since the mid-eighteenth century, the 1962 Act expanded upon this dynamic by establishing a structure for the designation of Regional Depository Libraries (RDLs).⁵ In particular, the 1962 Act, as codified, provides that there are to be not more than two RDLs in each state and the Commonwealth of Puerto Rico, and that in addition to fulfilling the requirements for depository libraries, each RDL must "retain at least one copy of all Government publications either in printed or microfacsimile form (except those authorized

¹ Pub. L. 87-579, 76 Stat. 352, 87th Cong., 2d Sess. (1962).

² See, e.g., Pub. L. 90-620, 82 Stat. 1286, 90th Cong., 2d Sess. (1968).

³ 44 U.S.C. § 1902.

⁴ 44 U.S.C. § 1911.

⁵ 44 U.S.C. § 1912.

to be discarded by the Superintendent of Documents).⁶ RDLs are also required, “within the region served” to “provide interlibrary loan, reference service, and assistance for depository libraries in the disposal of unwanted Government publications.” Finally, the 1962 Act establishes that RDLs “may permit depository libraries, within the areas served by them, to dispose of Government publications which they have retained for five years after first offering them to other depository libraries within their area, then to other libraries.”⁷ The 1962 Act further included a provision stating, as codified, that “[t]he Public Printer, with the approval of the Joint Committee on Printing...may use any measure he considers necessary for the economical and practical implementation of this chapter.”⁸

These provisions are of significance in relation to a letter submitted by the GPO to the Joint Committee on Printing (JCP) requesting its approval “to designate the regional Federal depository libraries at the University of Kansas and the University of Nebraska as shared regional depository libraries.”⁹ The stated rationale for this proposal is that such a designation would allow these RDLs “to consolidate collections and reallocate resources to achieve operational efficiencies, giving the libraries a practical and economical means for providing public access in the areas they serve.” As noted in the letter, this proposal marks “the first instance of a request for a formal designation of shared regional depository libraries between two or more States, as opposed to designation of a regional depository library within a State as prescribed by 44 U.S.C. 1912.” The GPO letter concludes by requesting the JCP’s approval for such a designation, “[p]ursuant to 44 U.S.C. 1914, which permits the Public Printer, with the approval of the Committee, to ‘use any measure he considers necessary for the economical and practical implementation of [chapter 19 of Title 44, U.S.C.]’”

At the outset, it should be noted that significant constitutional concerns adhere to the historic role of the JCP in controlling the activities of the Public Printer in light of the Supreme Court’s ruling in *INS v. Chadha*.¹⁰ In *Chadha*, the Supreme Court analyzed §244(c)(2) of the Immigration and Nationality Act, which granted to Congress the power to exercise a legislative veto over decisions made by the Attorney General under the Act. Specifically, §244(c)(2) enabled Congress to overrule deportation decisions by the passage of an appropriate resolution by one House of Congress.¹¹ The Court noted that a legislative veto constituted an exercise of legislative power, as its use has “the purpose and effect of altering the legal rights, duties, and relations of persons...outside the legislative branch.”¹² As such, the Court concluded that a legislative veto could only be exercised in comportment with the bicameralism and presentment requirements of Article I.¹³ Given that the statute authorized either House of Congress to execute a legislative veto, the Court determined that

⁶ 44 U.S.C. § 1912.

⁷ 44 U.S.C. § 1912.

⁸ 44 U.S.C. § 1914.

⁹ Letter from William H. Turri, Acting Public Printer, to the Honorable Robert A. Brady, Chairman, Joint Committee on Printing, Sept. 13, 2007 (copy on file with author).

¹⁰ 462 U.S. 919 (1983).

¹¹ *Id.* at 923.

¹² *Id.* at 952.

¹³ *Id.* at 954-955.

the provision was an unconstitutional violation of the separation of powers doctrine.¹⁴ With its decision in *Chadha*, the Supreme Court established that Congress may exercise its legislative authority only “in accord with a single, finely wrought and exhaustively considered procedure,” namely bicameral passage and presentment to the President.¹⁵

The maxims delineated in *Chadha* would appear to be fully applicable to the activities of the JCP. The JCP is broadly authorized to “use any measures it considers necessary to remedy neglect, delay, duplication, or waste in the public printing and binding and the distribution of Government publications,”¹⁶ and its exercise of this authority extends beyond oversight and veto to affirmative direction and control. With regard to the current inquiry, the Public Printer, as noted above, may only exercise the implementation authority vested in him in § 1914 “with the approval of the Joint Committee on Printing.” Such broad directive and veto authority runs contrary to the Court’s holding in *Chadha*, and any exercise of such authority by the JCP would be fundamentally constitutionally suspect.¹⁷

In addition to this potential constitutional issue, the establishment of “shared regional depository libraries” could potentially be viewed as violating the provisions of the Depository Library Act of 1962. As noted above, § 1912 establishes that there are to be not more than two RDLs in “each State,”; that each RDL “shall receive” copies of all new Government publications authorized for distribution to depository libraries; that each RDL, in addition to fulfilling the requirements for depository libraries, must “retain at least one copy” of all Government publications (except those authorized to be discarded by the Superintendent of Documents); and that each RDL, “within the region served,” must provide interlibrary loan, reference service, and publication disposal assistance to depository libraries.

One issue adhering to the current proposal is whether the 1962 Act may be construed as allowing RDLs to serve geographic areas outside of the State in which they are located. Regarding the traditional establishment of RDLs, § 1912 states that “[d]esignation of regional depository libraries may be made by a Senator...within the areas served by them.” This phrase is not entirely clear, and the 1962 Act does not further define or explain what geographic areas may be served by RDLs. Thus, this phrase could be interpreted as simply

¹⁴ *Id.* at 954-955. Shortly after its decision in *Chadha*, the Court without opinion and with one dissent summarily affirmed lower court opinions that had struck down a two-House legislative veto provision of the Federal Trade Commission Improvements Act, 15 U.S.C. § 57a-1. See *United States Senate v. Federal Trade Commission*, 463 U.S. 1216 (1983); *United States House of Representatives v. Federal Trade Commission*, 463 U.S. 1216 (1983).

¹⁵ *Id.* at 951.

¹⁶ 44 U.S.C. § 103.

¹⁷ It should further be noted that it is possible that the JCP’s historical role in controlling government printing could be seen as so integral to accomplishing Congress’ intentions with respect to executive branch printing that a court might find the JCP’s control authorities to be unseverable from the legislative scheme as a whole. See, e.g., *Alaska Airlines, Inc. v. Brock*, 480 U.S. 678, 685 (1987)(stating severability standard); *EEOC v. CBS, Inc.*, 743 F.2d 969, 971 (2d Cir. 1984)(finding that “Congress would have been unwilling to delegate to the President such extensive authority to reorganize the executive branch” without the check of the legislative veto); *City of New Haven v. U.S.*, 809 F.2d 900 (D.C. Cir. 1987)(holding that in view of strong evidence that Congress would not have enacted the deferral provision of the Impoundment Act, the veto and the President’s broad deferral authority under that provision must both fall).

empowering a Senator to designate an RDL in the state in which he or she serves, without specific limitation on the geographic area that may in turn be served by the RDL. Conversely, it could be argued that this phrase, viewed in conjunction with the overall structure of § 1912 in authorizing the establishment of up to two RDLs in each state, contemplates that such RDLs will serve a state specific service function. This latter interpretation finds support in the Senate Report accompanying the 1962 Act. In particular, the Senate Report states that “[w]hile it is believed that most States could be adequately served by one regional depository...two would be permitted if required.”¹⁸ The Senate Report additionally explains that one of the main purposes of the RDLs would be to make complete document collections accessible to “all the regular depositories within the State.”¹⁹ While these statements seem to indicate that RDLs were intended to serve depository libraries in their respective states, this interpretation has not been followed in actual practice, as the University of Maine has apparently operated as a an RDL serving Vermont and New Hampshire since 1966 without objection.

Even assuming that RDLs may serve interstate geographic areas, § 1912 specifically requires that RDLs have a distinct and encompassing presence in a state, as evidenced by the requirement that there not be more than two RDLs in “each State,” that each RDL receive copies of all Government publications authorized for distribution, and that each RDL “retain at least one copy” of all such publications (except those that are authorized to be discarded). To the extent that the current proposal could operate in contravention of these requirements, its validity may be questioned. In particular, the GPO’s statement that the requested designation would allow the RDLs in question to “consolidate collections” would appear to run afoul of the explicit requirements that each RDL in a particular state receive and retain copies of all relevant Government publications. The aforementioned provisions of § 1912 establish that this receipt and retention responsibility is an immutable characteristic of an RDL, and § 1912 further makes it clear that an RDL must exist in a state. Accordingly, any proposal that purports to allow an RDL to avoid these obligations would appear to be violative of the statutory scheme laid out by Congress.²⁰

This conclusion adheres irrespective of the authority vested in the Public Printer to “use any measures he considers necessary for the economical and practical implementation” of the depository library program.²¹ Apart from the well settled maxim that a generalized statutory provision may not supplant “a matter specifically dealt with in another part of the same enactment,”²² the legislative history of the 1962 Act clearly indicates that this authority was not intended to be so expansive as to enable the Public Printer to effect fundamental changes to the depository library system created by Congress. Instead, this provision was

¹⁸ S. Rep. No. 1587, 87th Cong., 2d Sess. (1962), available at 1962 U.S.C.C.A.N. (87 Stat.) 2112.

¹⁹ *Id.* at 2120.

²⁰ It may be argued that the proposal could be given legal effect by virtue of the authority of the Superintendent of Documents to allow RDLs to discard documents, in that the Superintendent could give permission to one RDL or the other to “discard” parts of its collection that would in turn be retained by the other RDL, effectively accomplishing a consolidation of collections. However, it seems clear from the structure of the 1962 Act that this authority was intended to allow for the discarding of obsolete or unneeded material and should not be utilized as a mechanism to avoid the application of the plain terms of the Act.

²¹ 44 U.S.C. § 1914.

²² *Fourco Glass Co. v. Transmirra Products Corp.*, 353 U.S. 222, 228 (1957)(citations omitted).

intended to allow the Public Printer a degree of discretion in responding to the logistical and fiscal difficulties that were expected to arise from such a rapid expansion of the depository library program by enabling the Public Printer to exempt publications that were “produced in small numbers for specialized use” or that “could not justify the wide dissemination and high cost of maintenance.”²³ As such, to the extent that the current proposal would allow RDLs to avoid the explicit receipt and retention functions imposed upon them in § 1912, its provisions would appear to run contrary to the requirements of the depository library program.

²³ 108 Cong. Rec. 13984, 87th Cong., 2d Sess. (July 18, 1962) (statement of Rep. Hays).

APPENDIX B:
REGIONAL DEPOSITORY LIBRARY SURVEY, APRIL 2008

Regional Depository Library Survey, April 2008: Summary of Results

DRAFT

Regional Depository Library Survey: Summary of Results

GPO sent this survey to directors/deans of regional Federal depository libraries in April 2008. There was a 100% response rate, though there were some statements to which there were no responses.

1. Please enter your Depository Library #:

	Response Count
	52
Answered question	52
Skipped question	0

2. Please indicate the extent to which you agree or disagree with the following statements:

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Response Count
Space for housing Federal depository print publications is sufficient for 5 years.	7.8% (4)	15.7% (8)	13.7% (7)	41.2% (21)	21.6% (11)	51
Space for housing Federal depository microfiche is sufficient for 5 years.	3.9% (2)	17.6% (9)	9.8% (5)	43.1% (22)	25.5% (13)	51
Space for housing Federal depository tangible electronic publications is sufficient for 5 years.	4.0% (2)	10.0% (5)	4.0% (2)	58.0% (29)	24.0% (12)	50
My library does not have an adequate number of computers for the public to access online depository materials.	50.0% (26)	42.3% (22)	0.0% (0)	7.7% (4)	0.0% (0)	52
There is enough professional staff to support the depository operation in my library.	4.0% (2)	24.0% (12)	12.0% (6)	54.0% (27)	6.0% (3)	50
There is enough support staff to support the depository operation in my library.	3.9% (2)	17.6% (9)	13.7% (7)	62.7% (32)	2.0% (1)	51
There is enough temporary staff (e.g., students, volunteers) to help support the depository operation in my library.	5.9% (3)	9.8% (5)	33.3% (17)	47.1% (24)	3.9% (2)	51
There is enough staff in my library to support regional responsibilities to selectives in the region.	5.9% (3)	37.3% (19)	9.8% (5)	45.1% (23)	2.0% (1)	51
My library will consider serving as a regional for selective Federal depository libraries in neighboring states.	25.5% (13)	29.4% (15)	17.6% (9)	17.6% (9)	9.8% (5)	51
The Federal depository services in my library are seldom used.	38.5% (20)	51.9% (27)	1.9% (1)	5.8% (3)	1.9% (1)	52
The tangible Federal depository collection is frequently used.	2.0% (1)	15.7% (8)	13.7% (7)	51.0% (26)	17.6% (9)	51
A primarily online Federal Depository Library Program has expanded service opportunities in my library.	0.0% (0)	5.9% (3)	13.7% (7)	60.8% (31)	19.6% (10)	51

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Response Count
Regional library staff has sufficient support to conduct collection management training sessions for selective depository libraries in the region they serve.	13.7% (7)	27.5% (14)	15.7% (8)	43.1% (22)	0.0% (0)	51
Financial support to cover the costs of regional depository operations continues to increase.	33.3% (17)	39.2% (20)	13.7% (7)	11.8% (6)	2.0% (1)	51
I am prepared to expand the services provided to selective depositories in the region I serve.	15.7% (8)	39.2% (20)	19.6% (10)	23.5% (12)	2.0% (1)	51
Changes in depository library services are consistent with changes in other library services.	5.9% (3)	5.9% (3)	11.8% (6)	64.7% (33)	11.8% (6)	51
Changes in the depository collection are consistent with changes in other library collections.	3.9% (2)	15.7% (8)	15.7% (8)	56.9% (29)	7.8% (4)	51
Reallocation of funds within a static library budget resulted in less financial support for the depository operation.	9.6% (5)	28.8% (15)	19.2% (10)	26.9% (14)	15.4% (8)	52
My library's participation in statewide and regional consortia allows increased services to the people of my region.	0.0% (0)	0.0% (0)	11.8% (6)	64.7% (33)	23.5% (12)	51
The funding outlook for my library looks promising over the next 3-5 years; a budget increase is expected.	38.5% (20)	40.4% (21)	19.2% (10)	0.0% (0)	1.9% (1)	52
Federal depository services would improve if GPO placed consultants in the region I serve or the neighboring region.	9.8% (5)	17.6% (9)	29.4% (15)	31.4% (16)	11.8% (6)	51
The online information environment (e.g., network security, licensing agreements) has forced a discrepancy in Internet access provided to the general public and my library's primary clientele.	19.2% (10)	50.0% (26)	7.7% (4)	21.2% (11)	1.9% (1)	52
Budgetary constraints at my library have caused a decline in regional services to selective depositories in my region.	7.8% (4)	39.2% (20)	23.5% (12)	25.5% (13)	3.9% (2)	51
My library does not have a strong record of promoting Federal depository collections and services to constituencies other than the library's primary clientele.	17.6% (9)	41.2% (21)	3.9% (2)	29.4% (15)	7.8% (4)	51
If the option was available to regional depository libraries, my library would become as "virtual" as possible.	13.7% (7)	17.6% (9)	15.7% (8)	27.5% (14)	25.5% (13)	51
My library is considering relinquishing regional depository status and becoming a selective depository library.	49.0% (25)	25.5% (13)	5.9% (3)	13.7% (7)	5.9% (3)	51

3. Please provide any comments, further explanations, or observations about the current or projected conditions of your regional depository library specifically or the Federal Depository Library Program generally.

	Response Count
	35
Answered question	35
Skipped question	17

The State Library of Pennsylvania has recently celebrated its 150th anniversary as a federal depository library and 40 years as a Regional Depository. This shows the commitment of the State Library of Pennsylvania as a federal depository. The State Library is contemplating the moving of its tangible collection from a closed stack area to a more accessible area in our Law/Government Publications Reading Room. This will allow for more accessibility than ever before for our paper U.S. documents. Our library has increased the involvement of our regional coordinator by being involved with such projects as "Government Information Online", being part of the focus groups on the FDLP Desktop and the FDsys pages, participating in "Browse Topics", and the testing group for the "Needs & Offers" page of the FDLP desktop. The Regional Coordinator has reached out to selectives in our states by reinstating the State meeting that had not been held for almost ten years previous to this administration. The Regional Coordinator has recently been instrumental in encouraging selectives in the western part of our state to have a subgroup of their own. The Regional coordinator has also used the social networking tool Facebook in order to better communicate with the selectives in the Commonwealth. This tool is also used with the laborious task of dealing with the Needs & Offers lists that come in almost daily to our library. Being one of the Regionals with one of the largest numbers of selectives under one person it is a time consuming task. The use of a consultant sponsored by the Government Printing Office would be helpful in the coverage of training or consulting with many of the selectives that the Regional Coordinator does not get to see because of time and traveling costs constraints. The cost of advising the selectives and traveling to the fall and Spring Depository meetings is the second largest expense of our budget allocated to staff travel other than the Director. The most heavily used areas of our government collection are the Census materials, NOAA weather data, as well as our legislative and judicial materials. The materials are also heavily used by the local middle school and high school population for National History Day. Many of the selectives ask for ILL and copies of microforms that only the Regional library holds. The concern that Pennsylvania has will be for storage and migration of electronic materials. There are already many documents that are unreadable or unavailable due to changes in electronic formats. As more and more documents are available electronically the storage and retrieval of these documents will be challenge in the future. The preservation of the paper materials will also be an issue as well. The library feels that any digitization budget should go to the preservation of Pennsylvania documents first since the State Library of Pennsylvania may be the only repository of this information rather than the several repositories of U.S. government information.

The AUM Library is in a state of transition. Budgetary concerns have reduced available staffing for the library by two FTE positions. The library is to maintain current services to selectives, but is not able to add new services.

The library building here outgrew its space in the 1980s. The building leaks with nearly every rain and has sewer and mold problems. It would be nice if Federal funding would be made available to help regional depositories construct new buildings.

Question 1-3 - Room for Collections UVA Library needs more space for all its physical collections. Our remote storage is full and we are investigating a more remote remote storage option. We hope to build a second local remote storage facility, but funding is not available at this time. Meanwhile, all collections, including the depository ones, continue to grow. In addition to these current space pressures our library is planning on a major renovation to reallocate space away from collections and to people – more collaborative spaces, more study spaces, more congregating space. This would impact the growth space for all collections, including the federal government documents. Question 4 - Computers for public We do have enough computers for both our primary clientele AND the general public to use for research and accessing government information. However, we have recently required an ID from all members of the general public when using our computers. We continue to refine our policies and procedures for computer access to the general public - making sure it allows research and academic access without encouraging recreational computing. Question 5-7 - Staffing Twenty years ago the "documents" collection had a staff of two professional librarians and three and a half support staff. Now the

staff is two librarians and six support staff, but the responsibilities have expanded to include continuing education, periodicals, microforms, cataloging, Google book project support, technology, and general reference. The staff is spread thinner and the expertise is not as deep. Student workers are expected to provide general humanities and social science reference assistance as well as government information assistance. So, while we do have enough staff to serve the collections and provide service, those same staff are expected to do many things and they are unable to develop a deep expertise in government information.

Question 8 - Regional staffing The primary person providing services to Virginia selectives is the Regional Librarian. She is also head of the overall Humanities and Social Sciences reference operation and acting director of the Library for Humanities and Social Sciences. While the "acting director" position is temporary, the combination of head of both general reference and government information means that she might not devote as much time as other regional librarian to services to selectives. That said, we believe that Virginia selectives feel well served. The Regional Librarian attempts to visit each non-federal selective every 3 years or when there's a new depository coordinator. The Regional also holds annual meetings for Virginia selectives.

Question 12 - Online depository Reference staff at many of the UVA libraries are able to assist users with government information. Education Library staff can easily find the Digest of Education Statistics rather than sending users to government documents for the back files of this title. Staff in our data center (Scholars' Lab) often assist users with census and other government information.

Question 13 - Collection Management training Again, currently the primary person doing this work is the Regional Librarian who has additional local responsibilities.

Question 14 - Cost to be a depository continues to increase While staff to support continues to be a major expense, it is really the cost of storing the materials that is increasing. Shelf space is a commodity, and an increasingly scarce one. Many of our government documents are in remote storage, but this requires cataloging them. Such cataloging is costly.

Question 15 - Expand services At this time UVA isn't prepared or staffed to provide Virginia selectives with additional services. Our model is, to some extent, a "service on demand" model. If there's a specific need the Regional Librarian will visit a depository, or consult with a depository coordinator. Currently, there are not enough staff to offer much else.

Question 19 - cooperative efforts Undoubtedly the VIVA (Virtual Library of Virginia) our statewide higher education library consortium has vastly increased our services to both students and the residents of Virginia. None of the members of VIVA would be able to purchase all the resources that the consortial buying enables us to afford. Nor would we be able to offer the training that VIVA makes available.

Question 21 - GPO consultants GPO consultants would allow Virginia depositories to reach more citizens by, potentially, offering workshops and training in government information sources to the general public as well as to depository staff. Most depositories in Virginia are academic institutions. While they acknowledge their wider responsibility to the general public, it is unarguable that their primary constituents are their students and faculty.

Question 22 - Discrepancy in public computing access So far, we have been able to continue to offer the general public doing research similar computer access to our students and faculty. However, we are committed to providing our students and faculty adequate computer access. Should network security concerns or concerns about recreational computing by the general public become overwhelming it might be that we would need to, in some way, more closely monitor computer use by the general public. We would always allow the true researcher access to a computer, but we might need to require registration of some sort.

Question 23 - Regional services Actually, in recent years we have funded depository visits and other travel by the Regional Librarian. We have also funded some aspects of the annual selective meeting.

Question 24 - Promoting depository The depository has always reached out to other Virginia libraries – both depository and non-depository. We provide educational programs at the annual Virginia Library Association meetings. We have not been strong in reaching out to business groups or individual citizens.

Question 25 - as virtual as possible Our library is moving toward becoming "as virtual as possible" in many of its collections areas. This trend for the depository collections would be consistent with our other collections.

General comments U.S. government information is much more widely available and accessible now than it was when the Depository Library Act of 1962 was passed. At that time slow delivery methods, no scanning or digital delivery technology, poor interlibrary loan turn around times, lack of bibliographic control for federal materials and similar issues argued for the presence of a full regional depository in every state. Now, the ubiquity of federal information on the internet, much better bibliographic control of federal documents, and much better delivery methods, both physical and digital, are able to deliver federal information to U.S. citizens in all parts of the country. The future of the federal depository system certainly will include tangible collections of federal documents spread across the country. Whether there is a need for 50 duplicated collections around the country is debatable. More flexibility in the depository law to allow collaborative regional arrangements, while ensuring every citizen has reasonable access to government information, is crucial.

1. Our space situation is somewhat different from other regional depositories. We have an agreement with the Readex corporation in which they borrow our documents to make their Government Publications microfiche product. As part of that agreement, we receive a free copy of the microfiche and use that to selectively weed the print collection (format substitution being permissible for depositories). While our current space will not be sufficient forever, it will serve for more than 5 years. Without the Readex agreement we would be in the same space predicament as other regionals.

2. Due to the above mentioned agreement with Readex, we probably have more fiche than other regionals. Readex provides us with the necessary cases to house the fiche, but we are out of appropriate places to put the cases.

6-8. There is enough professional and support staff to process incoming materials and to fill requests, but there is not enough staff to tackle special projects, such as retrospective cataloging, or to provide outreach to likely community audiences such as immigrants, legal firms or the local technical institute. We have no temporary staff. We could use more staff to process

discard lists. I think the selectives do not feel we do this in a timely manner. Public access would be enhanced by spreading documents expertise more widely among the professional staff. 9. The current geographic arrangement for this regional and its selectives is very workable. I can reasonably travel to any of the selectives in a one day trip, and – if necessary – patrons can reasonably travel here in one day. There is also plenty of public transportation to this location. The number of selectives we serve, 27, is also a reasonable number. It might be difficult for us to serve more selectives, particularly in regard to processing discard lists, or if over-night travel were required. 10-11. There is room for improvement, however. 12. A fair portion of the increased number of questions, however, are really technical questions (how to access a .pdf, or navigate a database, for example) rather than questions about which government resource to use. There is still a strong demand for tangible materials in our particular community, as well. Using the online FDLP may involve printing something out for the patron, or reading a fact to him/her, rather than the patron using the resource directly. 15. It depends on the services requested. 21. It depends on what the consultant would do. 22. As a public library, the general public is our primary clientele. 23. Staffing shortages have increased the turn-around time on discard lists, which is very inconvenient for the selectives. 25. While space constraints call for some reliance on digital materials, most of the Library's collections are still a balance of "virtual" and tangible materials. The depository collection falls into line with this practice.

The concept of a shared depository would be viable for some regional depositories and should be an option. Such as between a couple of libraries or among a cadre of libraries. LSU Libraries has a long tradition of collecting federal and state documents. As a regional depository, we have a I with the other regional depository in the state as well as with the selective depositories.

With regard to question 25, we would not discard paper documents but would still become as virtual as possible. We are eager to see the legacy collection digitized. Also, we want to stress that we are firmly committed to the depository program.

Some questions in this survey are not well crafted and we had difficulty understanding what was being asked. This may result in some conclusions being suspect. Question 25 highlights the main theme of our concerns for the future. The University of Maryland Libraries would eagerly move to serving our repository role in a more or less completely digital environment that allowed for the transformation of the repository system that was created to serve a completely print world. The human and technological resources that we invest in supporting a regional depository are disproportionate to actual use of the collection when compared to other Library collections and services

Washington State Library is committed to continuing to have a strong regional depository. Many of our selective depositories would like more control of the format of publications they receive.

15. We were prepared to expand services if we can reallocate funds by forming with Kansas a joint regional collection. 17&18. University of Nebraska-Lincoln Libraries proposed a joint regional collection with Kansas so that we can continue in the program, improve services, while decreasing costs. We spend \$634,400 from our budget per year to support the Regional Depository Library Program. This figure includes no Federal funds. Costs include salaries (5.25 FTE), equipment, supplies of \$244,400 and cost to shelve and maintain the collection of legacy print of over 130,000 items at \$390,000 per year. Staffing was decreased in the past two years due to overall budget cuts.

Row 1 - The space that over half of the collection, more than one million publications, occupies is slated to be converted into a computer technology center sometime in 2009. Rows 8,23,26 - Colorado is fortunate to have two long time regionals within 30 miles of each other. Colorado University in Boulder has been the senior partner and driving force in the Colorado depository system since Tim Byrne first established the Colorado Government Publications Interest Group (GoPIG) years ago. At one time half of the selective's discard lists went to DPL and half went to CU but in the age of the internet it was decided that it would be more efficient to centralize discard lists through CU. DPL has done it's smaller part by being a very large GPO collection, in generally very good condition, that the Denver metropolitan area has relatively easy access to. Rows 11,12 - This is a mixed bag or double-edged sword. Take your pick. We can do more with faster access because so many newer items are online but it also means that people with computers at home or office can also have access to them without having to go to the library. That combined with the general uses of a public library means that our collection is therefore not heavily used. Row 26 - This is the big one. DPL is still weighing the options on this very important decision.

The University of North Carolina at Chapel Hill (UNC-CH) is a large Academic Research Library, currently ranked 17th* in the nation by the Association for Research Libraries (ARL). We have served as a Federal Depository since 1884 and as a Regional Federal Depository since 1963. While the Federal Depository Library Program (FDLP) has undergone significant changes, the underlying rationale – providing permanent public access to federal government documents - has not. We strongly support the continuation of the FDLP but applaud the documents community and GPO for utilizing whatever flexibility can be mined from Title 44 to adapt to the current environment while accomplishing this main goal of the program. Libraries of all types are facing many of the same challenges – funding, reallocation of space, doing more with less staff, and providing service beyond our physical boundaries. In addressing these challenges, libraries are increasingly working together in collaborative endeavors that seek not to diminish our service but to continue and often enhance what we do for our patrons. To that end, we fully support formal collaborative partnerships such as the Kansas/Nebraska shared regional proposal. We also support joint efforts to: retrospectively catalog older government documents, strengthen interlibrary loan service, digitize and make freely available government documents, identify expertise within the documents community for training and reference as well as ascertain the most complete collections for specific government agencies. Whether these collaborations are intra or inter state is irrelevant to the end goal of providing permanent public access to government documents. What is relevant and indeed very necessary is Congressional support for such collaboration among all federal depositories whether that means permitting creative and flexible, but legal, reading of Title 44 or minor tweaks that update the FLDP for its second centennial of service, which begins in 2013. *As of 2005-2006, this is the latest year available from ARL.

As the Director of the IN State Library I strongly support and I am committed to our role as the Regional Depository. Our budget has gone up, unlike most states. We are inputting our pre 1976 fed docs in our online catalog and use Marcive for 1976 to current. We have several librarians with a strong knowledge of fed docs and I have taught the course twice at the IN Univ School of Lib and INfo Science. We are going out to colleges and universities to talk about gov docs and increasing their visibility with exhibits and workshops. Roberta Brooker State Librarian Indiana State Library.

The budgetary support of our state library, including federal documents, has taken a downturn in the past couple of years and we expect it to continue for a few more years. We have moved non-depository collections back into this building, but moved part of our depository collection to remote storage. We have cut staff in all parts of the library, including documents, although we are periodically able to hire contract workers or interns to help with projects. We support the selective depository libraries as much as we can, although we are not able to schedule regular on-site visits. In addressing these facts, we have looked at other ways to do our work and make it meaningful. We house some of our documents (Congressional hearings) in acid-free records boxes to maximize space, we have trained almost all staff in documents work so they are able to provide initial assistance to people, and we have found teleconferencing and “Live Classroom” software as a help to have group discussions with selective depository librarians. During periods of budget cuts, such as the one we are in, the documents area is often better supported than other collections which are getting very few new materials. The efforts of the current leadership and staff in the State Library have allowed the depository to continue moving forward. This emphasis on the value of federal documents may not be duplicated in future years as people move on to new positions. Cuts in our agency budget may also affect our ability to continue as a depository in future years, and we consider this situation periodically. All areas of library information have been altered by technology except Title 44, which is almost 60 years out-of-date. Technology offers the potential for improved access through digitizing copies of government publications and lowers the need to retain multiple formats, and encourages the indexing and cataloging of regional collections. We support the need to update the Regional program. Specifically, we support the inclusion of shared regionals such as the one proposed by Kansas and Nebraska. The current structure of the depository system needs to be more flexible to allow selective depositories to continue conducting business to benefit their users. The role of the regional to provide oversight and approval is helpful and limiting. If a state were to lose their regional depository, the selectives would be adversely affected and each would be required to retain all materials “forever.” Support for selective depositories may be better satisfied on a multi-state perspective and look to the regional depositories as facilitators of the good work of selectives. There can be no meaningful budgetary defense of print duplicative legacy collections which are often held in prime library real estate. They are underused, costly to store and not indexed in a fashion that the society within which we operate understands or values.

The University of Colorado at Boulder will submit additional comments via the open comment page.

Director's responses.

Q. 16 & 17 Changes in both depository library services and collections have, and continue to lag behind development of digital services and collections in the academic library environment. The following are areas of significant concern: 1) Lack of common/similar interfaces for resource discovery, preferably that span all government agencies. 2) Lack of reliability/stability (durable URLs) of resources. 3) Lack of adherence to standards (e.g. Open URL) that allow relatively seamless linking to and from documents. 4) Lack of downloadable usage data. 5) Lack of complete downloadable MARC record sets for e-documents.

Regional depository services, around the nation, have always been of uneven quantity and quality. This is due not only to funding inequalities, but also to the uneven numbers of selectives served and geographical areas covered. For example, California has one regional and 90 selectives; a few states with smaller populations and many fewer selectives (New Mexico, Oklahoma, South Carolina) have two regionals; some states have no regionals. So the portion of the 1962 Depository Library Act which authorizes and enables regional depositories has always enjoyed mixed success. If Title 44 could somehow be revised to address this inequality of regional services, both regional and selective service to the public would be enhanced. In addition to this core deficiency, the 1962 Depository Library Act was written for library and information services as they existed forty-six years ago, when the Internet, comprehensive electronic libraries, and instantaneous electronic delivery of information were the dreams of science fiction. Because electronic library services and information delivery systems have resulted in decreased emphasis on physical collections, the costs of being a regional (under the terms of the 1962 law) are increasingly becoming an unfunded mandate. Regionals are charged, by law, with permanently housing comprehensive physical collections that are the property of the U.S. government. In 1962, these collection maintenance costs were mitigated by the free receipt of depository materials that regionals would have purchased with local funds—had they not been regionals. Now that tangible receipts have dwindled (yet the responsibility remains of permanently maintaining a heritage collection that belongs to the U.S. government), it is becoming increasingly difficult for the administrators of regionals to balance benefit to cost. If the U.S. government were to appropriate money to pay regionals for housing these collections, the benefit to cost balance would be at least partially restored.

Comments on Questions 1-3 Responses: We chose to answer in neutral because the reality is not that libraries COULD not have sufficient space for housing Federal depository collections (print, microfiche, or electronic), but rather that there are many competing needs for spaces and resources to support other collections, staff and for users. As well, we concur with the University of Florida comments that although we MAY have enough space in our remote storage facility to house the FDLP collections, there are additional challenges involved. Even given the possibility of provided cataloging records for pre-1976 materials, the LOCAL costs to process legacy collections for adequate reflection in OPAC's and remote storage (estimated at \$5.00 per piece) are very high (given the number of legacy collection items), and therefore a significant challenge for all Regional institutions. We also strongly believe, and would support, digitization of existing legacy collections in manner that would enhance an Open Access environment for these materials. Comment on Questions 5, 6, & 7: Although we may have 'enough' staff to sustain FDLP operations in our institution at current operational levels - we may not be able to adequately develop, promote, and sustain the kinds of services needed to adequately support users in accessing U.S. Government Information. Although much U.S. Government Information is readily accessible electronically, and more so as we move forward in time; the skills and expertise in aiding user's access to this information (and therefore supporting library staff at to effectively aid users) is a critical challenge - and one that takes resources to undertake. Comment on Question 9: We strongly agree and support the idea of providing support in neighboring states. This is at the heart of our (KS and NE) collaborative Regional proposal. Comment on Question 11: Our most heavily used materials from FDLP collections include soil surveys, Census, NASA, State, and Congressional materials. These areas fit most strongly with our own institutions programmatic areas. However, as a Research One Institution, all areas of FDLP materials are potentially relevant and we would wish for a coordinated system that supports universal access to the entire range of FDLP materials. And, the collections would be even more widely used if digitized. Comment on Question 14: In same fashion that University of Nebraska has done to document the 'costs' of being a Regional Library, we have determined that we are spending roughly \$80,000/year for services to provide intellectual access to FDLP and U.S. Government Information materials (abstracting/indexing, cataloging, full-text); roughly \$800,000/year to house tangible FDLP materials, and almost \$200,000/year for staff support, information technology, and other supplies. This comes to a total of \$1,092,459.10 a year in local institutional resources devoted to FDLP and other U.S. government information resources. Comment on Question 21: We could be interested in GPO Consultants. It would depend on what services, and supports a consultant's program was set up to provide to an FDLP Region. Comment on Question 23: We would not say that we have intentionally engaged in a recision of regional services to selectives, but rather that like all libraries, we are faced with the demands to do more for all users without a concurrent increase in resources (fiscal for staffing, content, spaces, services) to do so. Comment on Question 26: As an academic library we remain strongly committed to the ideal of public access to government information, and to the Federal Depository Library Program. That being said, should the requirements (and the draw on local fiscal and other finite resources) of continuing as a Regional become too difficult to maintain, or have a negative impact on other institutional needs, we would have to

seriously question continuation as a Regional Library with the FDLP. As well, as Selective Libraries may choose to weed their existing collections, select fewer tangible items in the future, or choose to leave the FDLP entirely, all of these choices will place increasing pressure on Regionals to support their Selectives in de-accessioning and as 'Collections of Last Resort' for their respective regions. Comment on potential future for the FDLP, Regional, and Selective Libraries within the program: We strongly believe that a compelling future exists in a more collaborative system of FDLP libraries that work together to share resources for training and support of public use for government information. This vision is also true for the digitization, and metadata creation, for existing legacy collections and new information formats of government information as we may see in the future. Overall comment on survey: We strongly concur with the comments housed by the University of Florida (Depository # 0103) as speaking to the current situation for Regional Depositories within the FDLP. Overall comment on survey: As other Regional institutions have commented, a more detailed, deliberative, and more comprehensive examination of the FDLP System, partner libraries, and pressures on system, would seem warranted. This would not be possible by the June 1, 2008 deadline JCP has established, but may be something to factor into the response to JCP.

We would like to amplify our answers to the following questions: Questions #1-2 – Growth space for print and microform collections of any kind is limited. For every new book we acquire, one must be eliminated or stored. As a Regional, the inability to engage in cooperative storage within and beyond the state is a serious problem. We must find new strategies for Regionals to participate in shared print collections. Question #3 – (space for CDs) It will be important going forward to ensure that a new Regional system will allow for the retention of a title in only one format, including online. A big step in that direction would be the revival of GPO's CD migration project. If all of the CDs we currently house in each Regional could be moved to a web-based format, this space issue would be resolved, and would allow our users to get to that information online. Allowing more online substitution could also relieve some pressure on our paper and fiche collections. Question #4 (computer access for users) and #25 (our desire to be as "virtual" as possible). Going forward, we would welcome more clarity in anticipated machine and system requirements regarding GPO requests for Regionals to store online files locally. Sudden changes in this environment result in capital expenses at the local level that cannot be addressed quickly, essentially becoming unfunded mandates. While GPO has not insisted that all Regionals assist in this storage effort up to this point, the time is coming when the issue of back-ups for government-held copies of these electronic files will have to be addressed or risk loss of information. If Regionals are to play a part in this effort, there will need to be more consultation and pre-planning for the systems component of such a commitment between Regionals and GPO. The source of funding to support such new investments is far from assured. Questions #5-7 – All types of staff have been reduced in our library system. For next year, we are losing 7 additional positions as a result of budget reductions of 6% in state support. We can sustain our current operation but future reductions may cause us to reconsider our status as a Regional depository. Question #8 – Our staff do an admirable job of training and supporting our Selective libraries. However, travel funds are limited both for the Selectives to come to us and for us to go to them. Questions #9 and #17 – Our answers to these questions might be different if we could be sure that a more flexible operating environment for Regionals is on the horizon. We would be willing to consider serving more than one state in a more flexible, collaborative Regional depository system that allows for more targeted collection responsibilities among a group of libraries who could share responsibility for cataloging, preserving, digitizing and providing access to a complete Regional depository legacy collection. Question #12 – Improved online access has enabled us to serve more users by phone or email rather than asking them to come to campus to use tangible materials. Questions #14 and #17 – The concept of shared Regionals is essential to our future. All Regional libraries share the same mission to provide the best possible service to the Selectives in their region, and to the public at large. The information paradigm for all libraries has shifted to more digital access, and toward more cooperative resources and services. The Regional depositories need the ability to pursue the same collaborative approach, at the same level, as their institutional libraries are pursuing. Questions #14 and #20— Kentucky libraries, depending on where their state funding is coming from, are facing budget reductions of anywhere from 6-15% in each of the next two years. Question #18 – A static budget would be a welcome one. Instead our budget is declining. Where possible, we have mainstreamed government documents processes for efficiency. Questions #19 and #21 –Our answers to these questions demonstrate the directions we would like to see a new system move: allow more collaboration among libraries, and create more participation incentives for the remaining Regionals or Regional consortia. The amount of tangible information products received by Regionals is no longer an adequate incentive to stay in the program. Thus, GPO needs to find other "carrots" that will be valuable enough in our new online information world to keep Regionals interested in participating. For example, financial assistance with cataloging and digitizing our pre-1976 holdings would be a major incentive for Regionals to retain their current status within the FDLP. Question #26 – Libraries are rapidly changing and evolving their services to remain relevant in the 21st century. If GPO and the JCP do not encourage and permit new models of service, we will be forced to consider whether we can continue serving as a Regional depository.

We have enjoyed and benefited from serving as the Regional for Connecticut and Rhode Island for many years.

Not all regional depositories are in dire straits. As in all libraries generally, there are varying levels of support and funding. While library funding may be limited, the federal regional depository at the Texas State Library and Archives Commission receives committed support. The depository is considered a valued resource for the citizens of Texas. The depository's strengths include: * Knowledgeable documents staff * Reference assistance to patrons statewide and nationally * Documents holdings records loaded into OPAC * Disposal/discard lists for all Texas selectives are processed monthly * Continually enhancing our historical collection by purchases, and by reviewing discard lists and a "needs" file * Space to keep the collection onsite * ILL and resource sharing through a statewide courier service * Computers upgraded as needed to meet GPO minimum requirements Areas for public access improvement: * Additional funding for materials supporting the documents collection * Funding for training for selective depository librarians and staff (or training materials and resources provided by GPO) * Retrospective cataloging of documents collection; would like funding or assistance from GPO Other long term issues/considerations: * The importance of regional depository historical collections, especially as selectives downsize their collections * The importance of stable digital access; limited server downtime; permanent access; authentication of electronic documents * Housing electronic documents on local servers * GPO coordinating training for depositories, and providing timely promotional materials.

Comments to GPO survey of regional depositories 4/29/08 Question 1. Space may be adequate when our remote storage facility becomes available next year, although many of the materials which would be most suitable for remote storage are not yet cataloged. I welcome the recent announcement that regionals and some selectives will cooperate to catalog pre-1976 materials. We would like to see GPO do some of the cataloging or provide funding for cataloging of pre-1976 docs. Question 2. Our library will be undergoing continued significant renovation and it is possible that microfiche materials will have to be moved or space for them reduced. We are reluctant to move uncataloged microfiche to remote storage. Questions 5 and 6. Like most other regionals our library spends a significant amount of time processing discard lists and trying to find homes for materials that we believe should not be discarded that we ourselves do not need. Our time is spent making space, processing discards, reviewing discard lists, and doing reference. We do not have much time for face-to-face outreach, nor to do much planning to coordinate collections or become a light archive for the state or regional, although we would welcome staff and time to pursue these initiatives. Question 11. Our historical (i.e., pre-1976) materials are in many cases used more frequently than recent materials. Questions 15, 21, and 25. Our library is not prepared to expand services to our region, although we believe that should be our goal. We would like to serve as a light archive similar to the Indiana model, and perhaps even to serve with another regional such as the Connecticut State Library or University of Maine as one of two light archives in New England. We see the value of retaining print resources (mostly in a light or dark archive) while at the same time becoming as virtual as possible. Historically BPL has been a weaker regional compared to many others. The Boston Library Consortium responded to GPO's request several years ago and forwarded a proposal to place a consultant in our state, who could help the regional as well as the selectives deal with technical services and provide training to us to help non-documents librarians throughout the state provide wider access to government documents. Funding for the consultant program was scratched, much to my dismay, so we did not get a consultant at what I believe was a critical time in our life as a regional. I obviously cannot say if services would improve if a consultant we placed here, but my institution seriously needs guidance on how best to spend our limited resources and to become as cost-efficient regional as is possible. Gail Fithian Curator of Government Documents Boston Public Library 700 Boylston Street Boston, MA 02116 (617) 859-2226 FAX (617) 859-2292

Question 1. Until 2004 Michigan was served by two regional depository libraries. Since the Detroit Public Library has relinquished their regional status in favor of selective library status, the Library of Michigan has sole responsibility for the permanent retention of tangible government publications in the state. The Detroit Public Library is systematically divesting itself of large portions of its collection. Given these circumstances, we can no longer predict the point at which we will run out of space for print publications. Question 9. Not under the current requirements. We currently attempt to serve Michigan depositories with training and occasional visits as well as interlibrary loan and disposal services. Like most state libraries, we could not fund travel across state lines to provide such services. We would be very interested in working *with* other states in a cooperative manner, such as outlined in the rejected Kansas-Nebraska proposal, should such arrangements be legally permitted. Question 15. We have expanded services to the extent we are able given the departure of the Detroit Public Library as a regional library. We are not able to serve Michigan libraries to the same level we were able to prior to 2004. Question 23. Budgetary constraints statewide led the Detroit Public Library to relinquish regional status. Those same budget constraints continue to limit the activities of the Library of Michigan, and make it impossible to fill the void. General comments: We remain very concerned for the integrity of the historical federal documents collection within the state of Michigan. Our concern is a result of becoming the sole regional serving 43 depositories over a very large service area, made more difficult by the complete lack of a process for us and the Detroit Public Library to follow.

Rationale for Survey Responses: Questions 1-3 (space): Depository items are currently housed in several buildings on campus: Gorgas Library, Rogers Science and Engineering Library, Bruno Business Library, McLure Education Library, University Map Library (administered by the Geography Department), and the Libraries' Annex. It is unclear whether or not we are running out of space to house the depository collection – we are currently removing more items from the collection than we are adding. However, the trend in libraries is to devote more space to users than to collections, so a “repurposing” of the space currently occupied by the depository collection in Gorgas Library could happen. Space is not just a concern for the depository collection – we are out of space in the Libraries as a whole. We estimate that we have at least 800,000 pre-1976 documents which are not cataloged. To copy catalog, barcode and process these in-house would cost at least \$4,000,000. This is a substantial amount of money and would not be possible at the current time given the restrictions on our budget. Questions 4, 22 (electronic access): Although wireless Internet access is restricted to those affiliated with the University, there are 30 public computers in Gorgas Library available for campus visitors interested in accessing government information. Licensed electronic resources are available remotely for the University community, and to anyone who wants to use them within the confines of the Library. Questions 5-8 (staffing): Current staffing: • Government Documents Unit of Gorgas Public Services -- 1 professional librarian -- 2 Library Assistants -- 6 student assistants • Cataloging and Metadata Services Department -- Library Assistant III (serials; half-time) -- Library Assistant II (monographs; full-time) -- 1 student assistant In previous semesters we have had interns from the School of Library and Information Studies. Student employment has fluctuated. The current staffing situation is adequate for our current operations/projects. If we want to expand services and take on additional projects in the near future, we will need more – particularly in cataloging. Questions 14, 18, 20, 23 (budget/funding): The administration has supported and funded travel for the Regional librarian to visit selective depositories and to attend meetings of the Federal Depository Library Council to the Public Printer. We have also been able to host a meeting of depository librarians and staff from around the state – the 2nd time ever that this has happened. Government Documents has a separate collections budget, intended for the purchase of materials to supplement the depository collection. We also have purchased/subscribe to some key electronic products, including the LexisNexis Congressional Serial Set and HeinOnline. Creating an atmosphere where collaboration on projects such as cataloging, digitizing or providing shared access to collections would be welcome. The state of Alabama's budget outlook for higher education is grim, and we are uncertain as to what our budget situation will be like for the next few years. Questions 8, 13, 15 (services to selectives): Service to selective depositories is a top priority of this Regional depository. Within the past year the depository librarian has: • established a web site with information specifically for selective depositories in Alabama • established a discussion list for depositories (ALDOCS) • collaborated with the other Regional, at Auburn University Montgomery, to streamline the process of handling disposal lists in the state • visited seven selective depositories in Region 1 of the state (the Region served by UA) Other services we provide: • Lend documents via Interlibrary Loan • Try to provide replacement materials (photocopies, copies of CDs, etc.) if a selective has lost or is missing an item • Answer reference questions, questions re: depository management via phone, email, Instant Messenger Future services: We are currently surveying selective depository staff in Alabama as to their training needs, as well as their overall expectations of the Regional depositories. Once these results have been analyzed, we will be able to tailor our services to meet their specific needs. Question 27 (cost of operating a Regional depository): The commitment to run a Regional depository is not insignificant. Our costs for the past year were \$273,000. This includes staff, travel, supporting materials and cataloging. Running a Regional Depository must be integrated with other library priorities such as the increasing pressure to add electronic resources to our overall collections, the need to reallocate limited space for user's, and the uncertainty about state funding for higher education. The benefits of being a Regional Depository are many; however, it would be to everyone's advantage to incorporate innovative ideas like the Kansas-Nebraska partnership into the GPO program. Providing access to materials in a digital format with the assurance of preservation and archiving will be vital for the future. This type of access will not only provide greater access of government materials to the public, but will also address several other issues such as space. Funding from GPO will be necessary to support this kind of initiative and must include funding for metadata creation, harvesting, outreach and training.

Questions 4 & 5 on sufficient professional/support staff: UNM is able to provide only 1 professional librarian dedicated to the overarching responsibilities that are required for Regional participation. There are only 2 Regional Libraries in New Mexico, who split their administrative duties and provide adequate coverage to the state's 9 selective depositories. UNM serves the majority of the depository library users in the state. UNM currently employs one support staff person who has responsibility for processing and shelving/interfiling all depository shipments received (GPO, loose mail, maps, and other materials disseminated). The support person also assists the Regional Librarian in training, resolving complex reference questions and the production of the state's newsletter. There are also two student assistants who spend 50% of their time assisting in the processing. Two student assistants also spend 50% of their time shelving/interfiling microfiche. UNM also has a full time employee responsible for the Map Library located in a separate location from the regional library collection. This person is not involved in the processing of depository maps (the exception being the shelving of maps received) but does provide quality reference services to all users of the map collection. This current staffing is insufficient, with dedicated new positions unlikely. A new model of distributing the workload across regionals, including other states, is needed. Question 14: Financial Support Like other institutions, internal financial support for the Regional has decreased

significantly over the past several years. Because of overall library budget constraints, activities and projects such as retrospective (e.g., pre-1976) cataloging, collaboration efforts with regional libraries in other states, travel to state selective depositories, and other projects have been decreased or curtailed. The recent opinion of the JCP will negatively impact our collaboration efforts that have been in the early planning states with inter- and intra-state regionals. Unless cooperative financial support is forthcoming from GPO or another federal entity, our abilities to maintain regional commitments will be strained further. Question 26: Relinquishing regional depository status At the current moment, no, we are not entertaining this notion and would only do so under extreme circumstances. However, unstable funding coupled with the ever changing needs of our many constituents, necessitate that a yearly assessment of our continued participation be conducted. The JCP should recognize the potential of the shared regional concept and how important it is for border-states to participate in order to continue to provide no-fee, unfettered access to federal government information. Although the UNM UL will continue to actively support and participate in sponsored projects such as the GWLA Digitization Project, GPO's Web Harvesting Initiative and other projects where grant funds are available, it becomes increasingly challenging to justify to the Provost and President of UNM the need to remain a regional depository. In an era of rapidly evolving technologies coupled with the ever-changing needs of our primary constituents, the continued commitment to a system last changed more than 40 years ago is increasingly difficult to maintain.

The Oregon State Library is the Federal Depository Library Program's newest Regional depository. In light of declining Regional services in Oregon, the State Library stepped forward to provide leadership for the depository libraries in the state in 2007. In agreeing to serve as the State's Regional, the State Library entered into a partnership with three of the State's largest selective depositories to house and provides services in conjunction with Oregon's Regional Depository Collection. Regional management and outreach responsibilities remain with the State Library. We feel that Oregon's innovative partnership has addressed many of the "challenges" to Regional depository libraries implied in this survey. We suggest that a description of Oregon's challenges and solutions would serve as helpful case study for the report to the Joint Committee on Printing, since it offers an alternative to the existing model of Regional services within the current statutory requirements. We would be happy to provide GPO with any additional information needed to create a case study for the report.

3. Tangible electronic publications is a case of unprofessional direction. 27. The highest priority for the GPO is to choose the series that need to be digitized. Cataloging is a waste of time and money. Digitization is the activity that has the greatest merit. In an increasingly electronic environment, what does it mean to be a depository library?-not much, if anything. The libraries foot the bill; GPO generates additional costs. A poor model. The public's use of Federal documents in our library is largely a myth.

1. GPO needs to move more aggressively to digitally archiving federal documents so that access is centralized, especially for high-use publications. 2. Regional depositories should move towards sharing collections and even service responsibilities with other regional and even selective depositories both intra- and inter-state. 3. Interlibrary lending of documents among regional depositories should be encouraged so that not all collections need to maintain holdings of all tangible documents. 4. The University of Hawaii at Manoa regional depository lost 95+% of its holdings in an October 2004 flood. The Library will not be able to replace all that was lost nor will it be able to process all replacement documents already received as gifts. 5. Like other university libraries, UH Manoa Library must place increasing emphasis on allocating resources for space, processing, and services to locally significant heritage collections and heavily used materials. At the same time we are repurposing library space for users rather than storage of collections. We cannot afford space for the large number of tangible documents that are not used. 6. Library resources available to allocate to federal government documents may not be sufficient to maintain a regional depository in the future. 7. Allow regional depositories to discard items not relevant to their local clientele, e.g. documents specific to other states with no informational value to a broader audience. 8. GPO needs statutory authority to give grants to regional depositories to do training and site visits to their selective depositories. 9. Resource sharing is the modern approach to library collections. A new system of several full depository service centers in each region (North, South, East, West) should be sufficient if funding is provided to those service centers to provide services to their neighboring states and territories. Existing regional depositories could then elect to become selective depositories with the materials they know their local clientele need the most.

Question #1 asks about space. Our most critical space problem is not necessarily for new materials shipped by GPO, but rather to store unprocessed legacy/historical documents that come to us from Missouri selective depository libraries. The FDLF system makes Regional depositories responsible for building and preserving tangible legacy government collections. The legacy collection is built by taking historic materials being weeded by selectives. Presently we have about 150 shelves of unprocessed documents in public areas because our storage rooms for unprocessed documents are filled

to capacity. We normally wouldn't have this much, but in the last couple years, two selective libraries in our state dropped their FDLP status. When a library drops its status, they must relinquish their government holdings to the regional. An increasing number of selective depositories have been dropping their FDLP status due to space considerations, and we wouldn't be surprised if a few more drop FDLP status over the next 10 years. A tremendous backlog caused by staff shortages is making it difficult for us to move unprocessed documents out of our public areas. The storage space problem is mitigated by the fact that due to decreased staff in the Docs office, we don't have time to check discard lists from other states. This is unfortunate because out-of-state libraries are typically the best source for Missouri materials which are lightly used and in good condition. Question #8 asks whether we have sufficient staff to support regional responsibilities to selectives. With one professional and one support staff person, we have only enough to fulfill the barest minimum. One of the traditional responsibilities has been for the Regional librarian to visit selective libraries in the region, review procedures, offer training, and provide advocacy for administrative support. We have 29 selectives. It would be impossible to visit all of them on a regular basis without neglecting our own needs at MU. Question #15 asks whether I am prepared to expand services to selective libraries. I am prepared to expand in whatever area my selectives demand, but it would mean dropping other projects. I'm not sure if this constitutes real expansion. Question #17 asks whether changes in depository library collections have been consistent with changes in other library services. One important difference is that electronic information from the government is outpacing that from private publishers. Yet the need for documents reference service is not decreasing. A great deal of government information is in the "Deep Web" and one must know the gateways – DOE Information Bridge, STINET, DTIC, Energy Citations Database, etc. in order to find it. Second, few documents questions are searches for known items. Sometimes we hear "Do you have this particular document?" But far more often we are asked which government document holds the answer to a question. To answer such a question, good knowledge of the collection is required. Third, because we still have vast numbers of documents not yet represented in our online catalog, public services staff are still needed to show users paper indexes such as the Monthly Catalog of United States Government Publications (1893-1996) and Pooles's Checklist (1789-1909), and then to show them how to use the Documents card files to determine whether we own a particular item.

Question 1. Space for print collections would be sufficient with the utilization of our remote storage facility, but deposit of documents is inhibited by the fact that this collection is not cataloged. Even when GPO provides cataloging records for the pre-1976 material through the shelf list digitization project, the cost of processing the collection will be substantial. We estimate that it would cost approximately \$4,000,000 to copy catalog and bar code our collection of approximately 800,000 pre-1976 documents. Questions 2 & 3. Space within our existing building does not allow for additional cabinets to house microfiche or tangible electronic products produced by GPO. We continue to purchase auxiliary commercial microfiche products to enhance our collection, further limiting our space. Questions 5, 6 & 7. The term "enough" is relative and subject to interpretation. We have adequate professional staff (2.5 FTE), support staff (5.5 FTE), and temporary staff (6 FTE) to sustain the operation, but not "enough" staff to provide the level of support to our constituents that they would like to have. Question 8. While I believe that our selective depository libraries would rank us among the strongest regionals, we are not able to support them as much as they (and we) would like. Travel funds are limited, both for the selectives to come to us and for us to go to their locations. Question 9. We are already serving as a regional library for two territories and have served as a regional for a contiguous state on an interim basis in the past. Question 11. Among the most heavily used materials are soil surveys, census data, and costal materials, as well as NASA, Smithsonian and Congressional publications. Question 12. Improved online access has enabled us to serve more users through phone and e-mail. We can more effectively answer phone and email requests for information and materials by directing users to the online sources rather than asking them to come into the library to use tangible materials. Question 14. Libraries today are all about collaboration and avoiding duplication. They are putting their resources into the digitization and cataloging of their unique (or relatively unique) materials to make them more accessible and visible. They are eliminating or moving to storage little used collections to increase user space. Government documents are not going to get the priority for scarce internal dollars unless it is an investment in recovery of space -- which means addressing cataloging, substitution rules and increased flexibility about establishing truly regional collections. Our library could become a light archive for print for the SE. We would willingly take on responsibility for a larger region if there is a source of funding. Question 15. We would consider providing additional services requested by our selective depository libraries, but our ability to provide such services is dependent on funding, so Federal support needs to be considered. Question 25. While we value and will continue to take advantage of the online resources, we are committed to maintaining a print collection for primary clientele and for the selectives we serve. Question 27. GENERAL COMMENTS: The regional depository libraries are self-funded, voluntary participants in the FDLP and they play a crucial critical role in the program. Allowing them more flexibility for collaboration in the management of regional collections and services is essential. Innovative ideas like the Kansas-Nebraska partnership should be encouraged. I am glad that GPO and JCP are undertaking this study. I hope this is the beginning of a dialog that will lead to constructive changes. The FDLP needs room for innovation and experimentation in order to thrive. As a regional depository library, we are experiencing a drastic increase in disposition lists, reflecting the pressure on our selectives to better manage their print collections and allocate space within their libraries for users and more heavily used collections. This increases their reliance on the regional library collection and services. With their collections diminishing, it is more critical than ever that we provide accurate holdings for our own collection, and that can only be accomplished through a massive cataloging and processing effort. Such an effort would also facilitate greater

collaboration with other depository libraries not within our current regional responsibilities. While the probability of Federal funding is extremely low, the urgent need for some funding for current regional depository libraries or new regional centers needs to be clearly articulated in the report to JCP. The days when the benefits of regional designation offset the costs are going away rapidly and for some may already be gone. Our annual costs for serving as a regional are \$437,039. This includes \$292,000 for professional and support staff. The balance is for temporary staff (student assistants) and operating expenses, such as services, equipment, travel and acquisition of commercial information products. It does not include the University's costs for space, building maintenance, utilities, etc. If federal funding became available for establishing 7 to 10 regional print repositories, including cataloging/inventorying those collections, there would probably be competition among existing regional libraries to serve in this new capacity. Our library would certainly be interested. Access to a comprehensive digital collection would greatly improve public access and make it feasible to operate a smaller number of regional print repositories. Such an initiative would need to provide for the availability of high quality images with searchable text, authenticated to assure validity, and supported by a robust system for retrieval and preservation/migration. The FDLP needs adequate funding for the new system and for other services such as harvesting and cataloging Federal publications from agency websites, digitization, and storage, as well as increased outreach and training. These are new or expanded requirements brought about by the changing environment that cannot be accomplished with the currently available funds.

Comments on specific questions: 1-2 The University is currently planning to build off-site storage. Assuming this happens within the next year, space for housing these collections will be fine but without this additional space, it will not be. Even with this space, the burden of the cataloging and barcoding needed to utilize the off-site storage for these print and microform government collections is daunting. 8. Iowa only has 13 selective depositories and many of them are questioning the value of continuing this commitment. As a result, we are constantly processing lists of items they no longer want to house so they can rely even more on the regional for housing these materials and the supporting services. This is placing a serious additional burden on the regionals. In addition, because so many of these selective depositories in Iowa are small libraries with very limited staff, they are increasingly looking to our library staff to develop and provide standard convenience tools for their users. 9. Under the current agreements with regionals, our library would not consider this additional responsibility. However, assuming a more up-to-date system for providing government information, we might be willing to consider some alternative, depending on how it is structured. 11. While not "frequently" used, the tangible collection is used. It is often the very old materials from the tangible collection that get the most use but our users would love to see this material in digital format. 21. I would need a clearer sense of what role such consultants would play before I could endorse the idea. 26. We have not actively considered relinquishing our regional status since there is no other library in Iowa capable or willing to assume this role. However, there clearly is no longer a need to have 50+ regional depository libraries. We are eager to see some more up-to-date system established. We might consider giving up this commitment or even assuming an additional commitment if some more practical, forward-looking alternative to the current program were established. Overall comment: The depository system is based on 40+ year old print-based realities that have changed dramatically in the last decade. It is not surprising that so many libraries, especially the selectives, are questioning their commitments to a depository system that is so antiquated, inflexible, and expensive to maintain. It is time that the whole system were re-examined and updated to reflect an increasingly digital environment, offering new options for delivery of information. All the existing regional libraries should not need to continue to house the same collections around the country at considerable institutional expense. This should be an excellent time for GPO to be able to experiment with new models (such as the one proposed by Kansas and Nebraska as well as other alternatives). We should be experimenting with new collaborative alternatives that are more consistent with user needs, financial realities, and digital capabilities. These alternative could help us all determine the best models for providing government information freely to the public in a way that is manageable for the libraries, effective for the user, and fiscally responsible to the tax-paying public.

Wisconsin is an excellent example that each regional depository is unique. It is uncertain if Wisconsin would have a regional depository today without this flexibility. The shared status employed here over the years has allowed us to manage the responsibilities of the depository by taking advantage of resources and staff expertise across campus. And, by distributing specific segments of the collection to campus libraries specializing in that given subject area, we are also better able to provide high-quality services to faculty, students and the general public. The FDLP needs to support innovation, experimentation and collaboration in and among regional repositories. As a Library Partner in Google's Book Search Project Wisconsin is actively digitizing federal government documents. This will greatly improve public access to federal government documents. Digitization projects such as these allow for a repurposing of library space to meet the learning needs of today's faculty and students. Regional services that we've been providing include: Managing discard lists; loaning materials to selectives; advising libraries on depository guidelines, services, discarding, selection, staying in the program; attending depository library conferences and reporting back to selectives; sending reminders about participating in GPO surveys; reference assistance; and visits to selectives.

Questions 1-3 Space is not an issue in our library, the University Libraries has a high-density storage facility that has allowed for the transfer of nearly 125,000 items or 6,000+ linear feet of material. Material is currently being annexed at a rate of 2,000 items or 100 linear feet per month. Question 4 The library has made a significant investment in public access workstations and laptops for the use of students and the general public. Questions 5-7 There is currently enough staff, there will likely be some re-purposing of staff in the next fiscal year that should minimally affect depository operations. Support for electronic information resources and services is the area of most need. Question 8 The regional librarians (USC and Clemson) conduct an annual meeting for selective depository librarians. At that meeting the selectives are asked about their needs and offered training. Three site visits were conducted during the current year by the USC regional. Training and assistance is provided on request and is encouraged. The selectives are most interested in the ability to discard materials. Question 9 This would only be possible if there were some compensation or financial support from the institutions or GPO. There needs to be a more regional or consortial approach instead of the state by state arrangement. Many large academic libraries already work in this manner, i.e., in the Southeast there is the Association of Southeastern Research Libraries (ASERL) that also works closely with SOLINET (a regional affiliate of OCLC). Question 10 There approximately 10,000-15,000 questions annually. The Government Information/Microforms service desk is the 2nd busiest in the library system and is available 84 hours per week during the semester. Question 11 The tangible collection use has been steady over the last few years. The library is also actively adding titles to the collection from selective discards and through retrospective cataloging of the collection. Question 13 Yes, sessions would be conducted is requested by selective depository staff. Question 14 Support remains the same annually, the library is under constant pressure to add new services in an environment of minimal increases in the budget. Question 19 Being a member of the state and regional consortia expands the expertise of the staff and the value of the collections. This value would increase even more if retrospective or legacy collections were available. Federal depository Library Program needs to move towards a more consortial service model, including the development of shared reference services, shared collections, and creation of center of expertise. Question 20 The current economic situation does not look promising over the next 1-3 years; it might improve in years 4- 5. Question 21 The library is very much in favor of this concept. It would provide expertise to conduct training session for depository and non-depository library staff. Since 95% of the current material is available online the need to be a FDL to access government information resources is practically moot. The focus for the future should be access (to current and legacy collections) and training for librarians and library staff to identify and provide guidance to the resources. A better public awareness campaign is needed. Question 23 The library's budget for depository services has remained flat; however the selective depository libraries have not requested any additional services. Question 25 The library and our customers value and see utility in the maintenance of the legacy collections. The more legacy material available full-text or virtually would improve access – however, the material must be indexed and fully searchable to be of use.

The New Mexico State Library is one of two Regional libraries in the State of New Mexico. The New Mexico State Plan articulates shared service responsibilities for the two Regional libraries, but does not directly consider shared collections. With the ready availability of current federal information on the internet, expedient document delivery mechanisms, and improved bibliographic control, consideration for the necessity of housing two collections in the State is overdue. Experience with both institutions over the past 18 years, however lends support to a more cautionary view, and the conclusion that redundant services (not necessarily in the same state) if not collections remain important to consider. Both institutions have experienced substantive administrative changes in the past 15 years resulting in an ebb and flow of support for their respective programs - and for depository libraries statewide. Winds can (and have) changed quickly along with each Regional Librarian's ability to provide support to depository libraries in the State. UNM has experienced both a fire and a flood in the past 5 years resulting in closed collections and redirecting of staff during times of recovery. The State Library was strong during that period of time, and able to step in and provide access to materials that were temporarily out of reach for UNM. The State Library's mission directs the depository to serve and train libraries in the State, while academic librarians are directed and supported towards national involvement to a higher degree. The balance has produced good results for the State. Currently, the State Library is experiencing difficulty filling a vacancy in their Regional Librarian position due to the increased cost of living in Santa Fe coupled with the low salaries offered by State Government. As a consequence of this extreme situation, New Mexico State Library is examining either relinquishing regional status or entering into a formal shared collection agreement. The Regional Librarian at the NM State Library is in basic agreement and support of the "Regional Depository Librarians' Perspective", and it is hoped that the long term experience of the two regional libraries in a relatively small state will point to the need for the national system to continue to carefully consider and support redundancies in service as well as collections. Support from institutions and governments, and access free of fire and flood that any given library takes for granted, might be here today and gone tomorrow.

May 16, 2008

APPENDIX C:

COMMENTS FROM THE FEDERAL DEPOSITORY LIBRARY COMMUNITY

Comments Received Through the FDLP Desktop Comment Form

Regional Depository Libraries in the 21st Century: Regional Depository Librarians' Perspective

Letters from Library Associations

DRAFT

Comments Received Through the FDLP Desktop Comment Form

As of 05/27/2008

Selective Depository Libraries

Academic Libraries

I have been very happy with the services I have received from [regional librarian]. A few years ago she visited our library and made many helpful suggestions. She has always posted my discard lists in a timely manner. When I have submitted questions she has always been very responsive.

At ... we have seen an increase in the level of communication with our regional depository. This increase has been for two reasons. First, we are trimming down our collection and therefore offering more weeded government documents to our regional. Second, we hired a new government documents librarian, and our regional librarian has been providing training and support to her.

The regional librarian is very supportive of the selective depositories, but the response rate, or the ability to handle questions and problems efficiently and quickly, has decreased. This decrease seems to be in large part due to a cut in staff support for the regional librarian by her institution. Our primary concern is this possible trend in the regional libraries to reduce staffing for the depository. We would like to see stronger support from the federal government to help our regionals maintain their historically valuable collections. In addition to resource support, collaborative activities, such as allowing shared regionals, would relieve pressure on each individual institution.

The last few decades have been a very challenging time for the Regional Depositories in [state]. The largest problems we've faced have been high turnover among Regional Librarians, the inability of our Regionals to hire highly experienced librarians, and the lack of a backup person at Regional Depositories when the Regional Librarian position is open.

When I first moved to [state] in 1991, ... was the Regional Librarian at ... and ... was the Regional Librarian at ... Both of these people had a great deal of experience in Depository Libraries and they provided excellent service to the selectives in the state.

[The regional librarian] retired several years ago and her position at ... has since been filled by a succession of librarians who have stayed in the position, I would guess, 2 to 4 years on average. Some of those people had good experience and knew what they were doing, so they were able to hit the ground running. Others had very little experience and went through a steep learning curve to get up to speed. At various points the position was vacant for several months at a time.

[The other regional librarian] left ... after a reorganization of the library split the Documents Department, which had been a stand-alone unit, into several components and folded it into other departments. I think he found it very frustrating to be the person responsible for Depository operations but to no longer be in charge of the people carrying out Depository operations. If I recall correctly, he was particularly appalled by the way the "regular" shelvers were messing up the documents stacks. Since [the regional librarian's] departure, ... too has had trouble hiring and keeping an experienced person in the Regional Librarian position.

Even though many documents departments have been split up and other departments are involved in providing depository services, there's usually no one in a Regional Depository who can train a new Regional Librarian. Any training they get will likely have to come from someone outside the building. As one of the most experienced Depository librarians in the region, I've often become a de facto mentor to many of the less experienced Regional Librarians who have come through the state. I haven't minded doing that, but if we had a GPO consultant in this region who could provide some sort of orientation and training for new Regional Librarians, that might be very useful. If a consultant couldn't be housed in the area, it would be nice if new Regional Librarians could be trained by someone from GPO who would visit their library, or perhaps by a more experienced Regional Librarian from a neighboring state.

The other problem we've had is related to the high turnover in Regional Librarians, and that is the lack of a backup person to take over depository services when the Regional Librarian position is open.

After Hurricanes Katrina and Rita hit the state in 2005, our Regional Librarians asked us to hold all of our weeded items going through the exchange list process and even to hold our superseded items in an attempt to replace materials in the collections that were damaged or destroyed. As a result, it was over a year before selectives were allowed to weed their collections and offer materials to other libraries. When we finally got to the end of the period during which we had agreed to embargo exchange lists, we happened to be in a situation where one or both Regional Librarian positions were vacant. While the position at ... was vacant, the Librarian at ... gave us permission to offer materials and a paraprofessional at ... checked their collection just to make sure they didn't need anything from our lists. However, when the position at ... became open, there was no one there who was willing (or able?) to check their collection for us. The Regional Librarian at ... then asked us to again hold our exchange lists. It became very frustrating.

In many ways we're blessed to have two Regional Depositories in [state], and even though the selectives are divided among the two Regionals for regular reporting purposes, it can be very difficult to coordinate services when we all find ourselves temporarily reporting to one or the other. If each Regional Librarian had a designated backup person who could at least keep the exchange list process moving in the absence of a Librarian, that would be wonderful. If we implement a system of shared Regionals, even more people would be impacted by vacancies in the Regional Librarian position without the designation of a backup.

I am satisfied with our Regional depository.

Outline looks good. I am particularly glad that you will provide background info and a rundown of the regional scenarios in place. "Organizational, financial, technological, and effect-on-selectives" factors are probably fine places to start. Here are some of my pet issues, with the places they might appear:

1- loss of librarian jobs with "government documents" in the title. Even at Regionals, we may see depository librarians whose primary duties are not described in gov docs terms, and possibly the loss of government documents "departments" in libraries. [ORGANIZATIONAL]

2- loss of expert level documents librarians at Regionals (through retirement, downsizing, etc.) [ORGANIZATIONAL]

3- possible decrease in Regional librarian's ability to travel to selective depositories [FINANCIAL]

4- There's no delicate way to put this: I fear the mass disposing/recycling (probably quietly in violation of depository rules, or following the minimum spirit of the rules) of legacy depository collections, without strong guidance from GPO and direct conversations with library directors. With care, we could do this *well* and make wonderful use of existing collections.

5- potential improvement: increased training, one-on-one mentoring offered through internet, teleconferencing, OPAL, social networking [TECHNOLOGICAL]

I guess one thing that might be missing, which is definitely part of 5 above, are CULTURAL factors. Certainly the culture of the workplace and the culture of libraries are changing, but so are our users' habits. Do you think the "technological" section will address these issues? (Quantifiable decrease in walk-in reference questions at most librarians, huge jump in in-house computing use, use of online government resources, patrons' increasing expectations about digital delivery or self-initiated Inter-Library Loan delivery.)

I don't have long experience with the Regionals in ..., as I have been in my position as government documents librarian for less than a year.

However, my experience thus far has not been great. When I started, there was no Regional librarian for my region, so I had no guidance for months. Since the Regional position has been filled, there have been long delays between my requests for information and any response.

In post-Katrina [state], selective libraries are required to offer all to-be-withdrawn materials to both Regionals before offering materials to the other selectives -- and neither Regional has been prompt to respond, not even with an acknowledgement that the offer has been received. It has been necessary to send repeated follow-up messages.

This has greatly slowed the process of weeding our long-neglected collection, causing us great inefficiency and space problems.

Unfortunately, I think the reason for these problems is that neither Regional librarian has much experience.

Since the Joint Committee on Printing (JCP) is unwilling, at the moment, to allow the University of Kansas and the University of Nebraska to become a shared Regional Library (their decision seems to be based less on the state of the GPO, FDLP libraries, and information dissemination than on allowing an agency to make a decision outside of its legislative authority, thereby setting a dangerous precedent for others to follow), the completion of GPO's proposed Report to the Joint Committee on Printing On the State of Regional Depository Libraries should be an eye opener to them. By the tone of their memorandum, I don't believe they really have an idea of the current state of electronic information. Their concern I believe, as I mentioned, is the precedent that might be set if the GPO is allowed to carry this decision forward.

Perhaps it's time to revisit the Depository Act of 1962. Rewrite it and make accommodations specifically tailored to digital information. If the JCP is concerned about enough copies of publications being available for the public, perhaps the law could be rewritten to allow for enough mirror sites as there are Regional Libraries available for the plethora of digital publications. After all, these digital documents are not supplementing the print items; they are replacing them. They have replaced them. Permanent, long-term access to these documents, I believe, is a greater and more pressing issue regarding public access than having enough [paper] copies available. This only makes sense. Electronic documents/publications, unlike distributed tangible items, are not in the possession of individual libraries (unless they have downloaded them and are hosting them): they reside on a server somewhere else (not necessarily overseen by a librarian) and (hopefully) remain there AND remain accessible to users. Were electronic publications ever expected to be downloaded and hosted at individual FDLP libraries? They are, after all, the new version of tangible items. As it is, in my opinion, a leap of the most unbelievable faith to assume that these electronic documents will be available in perpetuity considering the short lifespan of computers, the GPO should not only seriously consider this idea but hold to it.

We are a fairly new selective depository library (2004), located in [state] and receive documents only in electronic format. My regional library has always offered the level of support we have needed, both during the application process and in the years since.

There has been no change in service or organizational changes in these last 4 years that have affected us in any way. The regional stays in regular touch with us by email. This has been an exceptionally good experience all around.

Our regional continues to provide all the support we need, despite the tragic disaster of October 2004 in which they lost the majority of their documents. I am not aware of any other deliberate changes they have made in the past three years, other than the accommodations necessitated by the flood.

Here at [...] we have a close and personal relationship with our Regional Librarian and her staff. I have not encountered any situation in my department that she was not able to help me with. When we had to relocate to a smaller room and I made a request to discard our collection that was 5-years and older she met with me and my Director at that time to offer us advice on how we should handle the discarding procedures. She also helped me with a numerous of other situations which I am grateful for. I am very comfortable with contacting her or her staff with my concerns because she has shown much concern for the depository libraries and librarian in her regional with her show of support

I work as a librarian at the [library]. My responsibilities include administration of the federal depository library program collection designator [depository number], and working to make the library's operations and practices comply with the requirements for designation and participation in the Federal Depository Library Program. The statements that I am making are my own personal statements, and do not represent the position of my supervisors or the administration of the [institution].

My experience includes 3 years (1971-1974) as an Inventory Management Specialist (in the federal government GS-2010 occupation series, and 32 years experience (1977-2008) in academic, corporate, and federal government agency libraries. I worked in the Government Documents Department of the [library], a regional depository library, 1983-1988, and in the Government Documents collection of this library, a selective depository, from December, 1995 to this date. I was a user of federal government document collections as a college undergraduate, and during the 1970s as a researcher on several federal government agency reports.

I believe that the logistics inventory model used for the stockage and distribution of aircraft repair parts is applicable to a model regional depository library system that I will describe. In my model, the current selective depository libraries would be equivalent to lowest level units that maintain and repair aircraft and aircraft equipment. The local Congressional district depository libraries would stock the most frequently sought out and most frequently circulated government publications.

Orders for requested publications not available in a local collection would be filled by attempting to cross-fill the order from publication inventory among a cluster of nearby depository collections. These libraries would loan a publication for a short while, or send a digitized electronic copy or paper photocopy of the request publication.

Each local library would have a basic collection, and be allowed to select up to X % more publication item numbers. These item numbers would be publications of greatest relevance to the Congressional district, or all depositories in a sub-state regional cluster.

It is my belief that the median percentage item number selection rate for all depositories is about 25 %. It is my belief that most depositories could function with a collection selection rate that is near the rates of the U.S. Supreme Court Library 0096B 15 %, U.S. Senate Library 0094A, 11 %, and the Executive Office of the President Library 0089C, 19 %. I used the selections of these 3

libraries during the years 1997 to 1998 to decide upon a basic collection for this library. My goal was to reduce the selection rate from 71 % to a lower rate with a higher identified use. Local depository libraries would use the Monthly Catalog of Government Publications or non-federal bibliographies and indexes to identify publications by name or by group that they wished to borrow from a "depot level library". The depot level library would be a Regional Depository Library, but one that is not necessarily bound by state geographic boundaries as its service area. The slightly more than 50 regional depository libraries would serve from 20 to 30, with an average of 25, libraries in a geographic area or economic area. Systems that could be used would be the Department of Commerce Bureau of Economic Analysis Economic Area areas, with from 3 to 4 EAs per regional depository library. Other alternatives include dividing the U.S. population of more than 300 million by 50 -53 regional depositories, and following state political boundaries and county boundaries, or national geographic barriers when necessary, to split the service areas into equal size units.

I would like to see regional depository libraries take a lead role in encouraging local selective depository libraries select as few item number categories of documents as possible, and in return, be on call to provide rapid response with an original copy, photocopy, or digitized computer file that can be transmitted via the internet to a local library or local patron. I would like to see the oversight responsibility of the regional depository libraries identified and delineated, so that they provide standard services to each small group of depositories.

I have noted that the regional depository library for Indiana, the Indiana University Library and the Purdue University Library have concluded that they have an adequate supply of copies of publications 1976 and later. It is my understanding that Indiana selective depository libraries have been given permission by the state regional library to discard post-1975 documents without having to offer them to the state regional, but can post them as offers to other Indiana libraries and to national offers lists as they desire. This must be saving many hours of staff time for all Indiana libraries, and gives the libraries time to concentrate on examination of 1975 and earlier publications, and to identify any publication that might be a "fugitive document" to be moved to the state regional depository collection.

To summarize, I recommend that regional depository libraries be continued. I recommend that the workload of oversight and service to selective depository libraries be balanced out so that no library has more than 30 libraries in its service region, Regional libraries should send information to selective depositories telling them that it is okay to withdraw all publications of a classification number stem, or publications before a certain date, or by other criteria, so that selective depositories may clear their collections of backlogged material likely to be never used. Regional depositories should work with local selectives to see that each one selects a minimum number of item numbers, and that each selective can justify retention and selection of materials by item number based on circulation records, internal materials handling records, and any other fact-based evidence that is relevant. I am available by email, postal mail, or by telephone to give additional information. Once again, the comments made are my own opinion, have not been cleared for approval with my library administrators or university administrators.

My comments relate to Section IV b. and c. of the outline: current and projected conditions in regional libraries.

From my perspective, the library that has regional responsibility is demonstrating less and less support for the FDLP in terms of staff, space, and financial resources. Our regional librarian has two other significant assignments besides government documents. Government documents are less than 25% of his time. As a result, the only service the regional provides is needs and offers; there is no instruction, no coordination, and very little communication. The effect on the state's selectives is that essentially there is no regional library.

I see the current reality becoming even more pronounced in the future. In my own organization (which is staffed much better than the regional), I'm experiencing administrative pressure to reduce collections and services. As a selective, we have more flexibility. But regionals are trying to balance the traditional service/collections expectations with diminishing administrative support. The end result is that regionals cannot perform their mission, and selectives are receiving few if any regional services.

I hope the study gives serious consideration to the impact resulting from reductions in state government depository operations. The State of ... has recently cut state government documents staffing, causing a ripple effect on the federal regional depository side by virtue of being inter-related. Our very capable regional depository librarians for both state and federal operations are committed to providing information and direction, even if out of their direct responsibility. This places further stress on an inadequately-supported, yet essential set of service providers as nothing in the universe of government information works in a vacuum.

Congress must find a way to allow the request for a shared depository to go forward. Forty-six years have passed since the enacting of the most recent law. Everything about how we manage our libraries has changed dramatically in that period. Libraries are committed to serving the public good and value our role as a dispenser of public information. However, as we find creative ways to reduce duplication and fast and easy ways to share collections in every other portion of our libraries, we must be allowed to do the same with government publications.

[State] regional depository is, I believe, one of the best in the FDLP. An example of useful new service is the collection development training seminars offered at various venues throughout the state. The [regional] recently completed a major reorganization, but the transition went smoothly with no impact whatsoever on the selective depositories.

I've only had positive experiences with the Regional Library. They provide reference assistance for difficult reference questions and organize informative meetings at the state level where we can learn and network with other depository librarians. We are an active group separately and in conjunction with the state library association.

The permission to discard/offer process has always been slow, but they will have a new staff position soon, and the time lag from submission of the discard/offer list to the regional until distribution of the list to the other selectives in the state should improve.

Thank you for the opportunity to comment on the relationship between the [library] Selective Depository and our Regional Depository at the [state] State Library. As requested, I would like to comment on the impact that changes at [state] State Library, most notably in funding and staffing, will have on public access. As indicated in the background notes, the cornerstone of the Federal Library Depository Program is the principle that provision of no-fee public access to government information is essential to a healthy Democracy. Changes in funding and staffing at [state] State Library, which we rely on for critical services, will directly impact our ability to provide government information to the public.

[depository] relies on [state] State Library to assist us in providing access to government information by helping us with the day-to-day management of our collections. The assistance takes many forms ranging from the coordination of de-selection processes to directing cutting-edge document preservation initiatives. Budgetary cutbacks will impact [state] State Library's role in several ways:

- [state] State Library has traditionally directed special preservation projects, a role that is becoming increasingly important as more government information is born digital. UCI is concerned that in the future the State Library will not be able to fully participate in preservation projects.
- As a major research library, the [depository] Library depends on [state] State Library to provide us with material we do not have in our depository and to help us replace missing or shorted microfiche. Funding and staff cuts will result in delays in Interlibrary Loans and, potentially, the need to charge for the fiche they copy. [depository]'s faculty and students will have to wait longer to use material germane to their research and the costs will be a barrier to access.
- The State Library coordinates the de-accessioning of government documents. Staffing shortages at [state] State Library will lengthen the time it takes for [depository]'s de-accession lists to be posted. The longer it takes for [state] State Library to process these lists, the longer other libraries will have to wait to claim the material for their collections. Valuable government information will be unavailable to the public for long periods of time.

[depository]'s concerns are not confined to collection management issues. [state] State Library also offers specialized reference assistance, helping [depository]'s researchers to identify and access government information that is not readily available.

- Locating government information often requires the use of specialized tools that are not easy to learn or understand, particularly when working with historical documents. Expert help is required. If [state] State Library staffing is curtailed due to budget constraints, [depository]'s researchers will receive a lower standard of service when they go directly to [state] State Library for assistance and [depository] will make fewer referrals. Researchers may not identify

documents important for their studies, even though the documents exist.

- [depository] relies on [state] State Library's staff to help locate materials in collections that still need to be cataloged. The [state] State Library historical collection, for instance, is a rich source of information, but is not completely cataloged. Reducing staff experienced in navigating these collections will not only make access more difficult, it will ensure the materials remain uncataloged. Without specialized assistance and proper cataloging, researchers may not know about documents important for their studies, even though the documents exist and a freely accessible.

The Regional Library at the [state] State Library plays a vital role in providing access to government information to the people of [state]. In this, the largest of all the Federal Depository Regional systems, selective depositories are particularly dependent on the service provided by the regional. Changes in staffing, funding etc. will impact its ability to continue offering service to selective depositories and the public.

The Regional Library in Oregon has recently gone through a restructuring process. Prior to the restructuring we had one Regional which housed everything. Now Oregon has a distributed housing arrangement among four partner libraries with Oregon State Library being determined the Regional Library. Each partner library will retain government information products from designated federal agencies in accordance with traditional collection strengths of each institution.

I have managed the Federal Documents program at our library for 10 years and have had very little contact with our past Regional. Basically the only reason I had contact with the Regional was for disposal of withdrawn material. I hope that the restructuring will improve the support and guidance we receive from our regional. We are hoping this new concept includes improved support and leadership from Oregon's Regional Library and its partners.

A lack of funding continues to be an issue for both Regionals and Selectives in every state. Addressing funding issues for all depository libraries would help to resolve some of the major issues facing these libraries.

I believe regional depository libraries still have an important role to play in the FDLP. Regionals are best suited to provide training on using FDLP information resources which selectives may not have the time or staff to devote expertise to. Regionals also serve as the collection of last resort for selective depositories within the state or multi-state area they serve. This is particularly important because only a small percentage of retrospective U.S. Government publications will ever be digitized.

The [regional library] has provided good support to [state] depository libraries. They have made a big step in improving access to their resources by contracting with Marcive to do a tape load of their depository collections back to 1976. I only wish the [state] General Assembly would provide the library with the fiscal resources needed to effectively house and preserve their vast repository of tangible format U.S. Government documents.

A number of the selective depositories in [state] have already cooperated to address the services provided by our regional. These include the creation of a local community of experts; training; catalog records; access to the regional tangible collection; discard process; activities to assist smaller selectives; and an initiative toward an updated state plan. These services and issues were addressed in detail in a letter from the selective depository librarians to Dean of Libraries at [regional library].

My opinion is that the regional has been exemplary in its services to selectives. Much of this activity has focused upon a local Government Publications Interest Group which normally meets 9 or 10 times annually. These meetings not only convey information about FDLP activities and initiatives, they also provide a forum for all documents librarians locally to participate in discussion and training activities. In addition, the regional in the last couple of years has sponsored a Five State Conference, the latest (2006) held in Boulder. In 2007 the ...regional also obtained in IMLS grant that allows documents librarians in Arizona, New Mexico, Utah, Wyoming, and Colorado to create training modules on the Web Junction and offer documents training to non-documents librarians in the five states.

All these initiatives point to a very active and involved regional, one that provides excellent opportunities for selective depository librarians to easily become involved in FDLP activities, including both training and the addressing of current issues of concern. I have been extremely impressed with the regional and urge that GPO do all it can to foster and strengthen the regional system.

I am writing in response to your letter to selective depository directors dated April 22, 2008.

Collectively, the [university] Libraries are a large academic, selective depository served by the single Regional Library in [state], the [state] State Library. While we have a positive relationship with the Regional Library, we do not rely heavily on the Regional Depository Librarian for training, reference support, or mentoring as do many smaller selective libraries.

The current Regional Depository Librarian at the [state] State Library, [regional librarian], is dedicated and passionate about both his place in the depository system and his role in assisting selective libraries across the State. While he is the sole (and overburdened) Regional Librarian in our very large state, he has made great strides in providing training and leadership, and makes an effort to maintain lines of communication with every new depository librarian in the ninety selective libraries served by the State Library.

A significant reorganization at the [state] State Library went into effect on March 1, 2008 which directly affected the Government Publications Section of the Library. While the long-term effects of this reorganization are uncertain at this juncture, it has reduced the number of personnel working directly with government documents. Consequently, this reorganization will almost certainly impact services offered to selective depositories. One of the negative impacts of

the State Library's recent reorganization that we anticipate is long delays for selective depositories in receiving permission to discard depository materials.

As a growth campus in the [university] system, [institution] is facing growing numbers of incoming students whom we must serve using our current library facilities. Aggressive weeding of library collections has already begun to create more student study space and there are plans to substantially reduce the footprint of our physical documents collection. The area we are targeting first—older agriculture documents from outside our region—will potentially include several thousand documents that need to go through regular depository disposal procedures. Even before the recent reorganization, the State Library had a backlog of disposal lists because of the large number of selective depositories in the state. This problem will almost certainly be aggravated in the future, causing our weeding process to be longer and more cumbersome. Over the coming years, this will be a continuing struggle and is only one example of how the State Library's reorganization and large area of coverage will make it more difficult for it to serve selective depositories in [state], even those that generally require less support.

The Depository Library Act of 1962 was passed in a world in which access to federal depository materials was always physical. While there is still much information—current and historical—in tangible form, the importance of Regional libraries and Regional depository librarians goes far beyond the physical collection housed in the Library building. The law governing the Regional Library system should reflect this and allow the FDLP to embrace 21st century collaborative solutions rather than hold it to the standards of a previous age.

The GPO's stated goal is to make the current system of Regional Depository Libraries more flexible. In order to achieve this goal, I strongly encourage the Joint Committee on Printing to push forward the changes in Title 44 that will allow Shared Regionals and create a more flexible Regional depository system. This change will help rather than hinder public access to government information.

Thank you for the opportunity to comment on this important matter.

I understand that the JCP must have requested a report on "the state of Regional libraries" and that caused the report to focus on an examination of conditions pertaining to Regional libraries. However, I feel that the focus needs to move somewhat to the condition of the services Regional libraries provide to selectives and how the conditions at selectives impact permanent no-fee public access to federal information. In ... the Regional's influence is felt through his (excellent) work with selectives and his guidance of librarians at selective depositories. The end-user at a selective depository is served, in part, through the Regional's work. To ignore the conditions of selectives and how those conditions might change in the absence of a Regional is, at least in my opinion, missing the point.

As someone close to the Kansas/Nebraska agreement, I find the premise of this regional study--that the proposal signals growing challenges, etc., etc.--both interesting and skewed. Interesting

because it assumes that something is wrong (it is) and needs to be fixed (it does) and skewed in that the bias against this proposal has led to this study in the first place.

What is wrong and what needs to be fixed is that we are hampered by law and practice that does not account for the way government information is now being shared and distributed or the collaborative and consortial ways libraries work. Organizational, financial, and space challenges are not exclusive to regional depositories but are a part of the larger shifts that we are making in academic libraries to better meet user needs. Users come to our facilities for different purposes, often not driven by the use of print materials, so many of us are reducing our "collection footprint" to accommodate new needs including collaborative learning spaces, data centers, etc. Financially and technologically, we continue the shift from ownership to access that we began 20 years ago. It makes good managerial sense for us to look at our government documents collections as a part of the whole when we are setting priorities and seeking alternatives for dollars, space and staff.

I encourage reconsideration and revision of Title 44 to catch up with today's government and today's libraries.

Our regional depository does provide the level of support we expect from a regional depository. They have been helpful every time I have requested their assistance.

I am not aware that there have been any changes in services offered by our regional depository within the last 3 years.

[The former regional librarian] was helpful in the past. He is no longer heading up the regional depository. ... is now acting in that position. She and ... have both been ready to help any time I have asked for assistance.

In response to Mr. Davis' letter to selective depository Library directors and suggested topics:

1. ... is too small and does not have the resources to serve as a regional so we would not consider seeking regional designation.
 2. Our regional has served us well over the years providing/exceeding the expected level of support.
 3. Our regional has not eliminated any basic services to selectives.
 4. The new regional depository librarian is reaching out to the selectives and continuing the excellent support and relationship we had with her predecessor.
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Our depository is a large academic depository and we feel that we receive an appropriate level of support from our regional. Although we receive roughly 93-94%, we are not interested in becoming a regional at this time.

Our contacts with the regional are mainly in three categories:

- 1) Occasional offerings of materials we plan to discard; the regional has taken some materials we've offered.
 - 2) Requests for information on material we never received and/or to borrow materials we never received (we occasionally borrow to make fiche copies of hearings that never arrived).
 - 3) Information on discrepancies in what GPO says we are receiving and what has actually arrived.
- Responses from the regional are normally prompt and helpful.

Our regional has been very active and supportive in the last several years. They've been particularly in interacting with depositories across the state. This year they hosted a meeting for several consortial documents groups that was well attended.

The [library] (Selective depository #...) understands the challenges facing Regional depositories in the current, evolving landscape of government information and library and information services in general. We acknowledge that the concept of shared and/or collaborative Regionals offers benefits to libraries currently serving as Regional depositories—the primary one being more flexibility in their collections, which allows for more efficient allocation of space and provides opportunities for cooperation with regard to cataloging and preservation.

As a Selective depository, our main concerns are the level of service we receive from our Regional library and the comprehensiveness and accessibility of the Regionals' collections. Our Regional library at present adequately meets our depository administration needs (i.e. they process disposal lists, answer queries, provide support, etc. in a timely manner). There is a concern that, in the event that our Regional decided to share responsibilities with another Regional, especially across state lines, this could generate confusion and inconsistency, leading to a diminution of efficiency. It might also be used by administrators as a justification for a decrease in or reallocation of staffing, leading to a subsequent reduction in service quality and processing time. If this occurred, it would negatively affect the depository workflow of Selectives.

With regard to shared housing agreements for Regional collections, we embrace this initiative with the following caveat: while there are loose guidelines for this, it is imperative that specific standards be set by GPO to ensure that, between the shared Regionals, a full, comprehensive collection is established and preserved; it must also be comprehensively cataloged to ensure identification for public access. Standards would also prevent discrepancies through staff and/or administration changes. As a selective, [library] maintains a current collection to meet its users' needs, but for many retrospective or rarely requested materials, it must look to its Regional libraries. Often these are the very materials which remain uncataloged and, therefore, inaccessible. [library] supports collaborative cataloging initiatives between Regionals which will improve access to these resources. Another concern raised by shared housing agreements is that of distance. It is important that [library] be able to refer its users to a relatively close Regional collection for the information they need if it is not available electronically or through ILL (and many retrospective resources, even when cataloged, are not due to format or circulation restrictions).

We support GPO's exploration of new and more efficient ways to help Regionals manage both their collections and their Selectives, and we look forward to seeing further research and discussion on this matter.

Our State Library comments are that, over the past few years with ... as regional librarian, the [state] State Library regional has provided the ... selective depository with guidance, fulfilled ILL requests for depository documents, solicited our views on depository operations, arranged meetings of [state] depository librarians, and kept us informed of changes in holdings of other nearby selective depositories. The ... regional has shown particular concern that the public in [county] Congressional districts have access to federal depository publications. We were pleased with the attention and service provided by [regional librarian]

However, we are now concerned that recent deep cuts in [regional library] staffing and the recent [regional library] reorganization will lead to reduced services from the regional. Our concern is that this will lead to reduced public access to federal government publications.

Shared Collections and Title 44

The ... serves as the regional library for [state] and has done so for many years. The major difference from the University of Kansas and University of Nebraska proposed shared depository model is that we do not have agreements to share our collection responsibilities with any depository outside our state including our Regional. The Regional functions as a back-up and last resort collection as is typical of Regional libraries serving only one state.

It has been sometime since Title 44 has been amended so maybe the time has come to accommodate changes brought about in the depository system of the 21st century through amending Title 44. Some in the depository community are fearful that due to common misconceptions such as "everything is online", without strenuous efforts to educate legislators and the general public, it will be difficult to pass legislation that will effectively strengthen Title 44. GPO has struggled for the last decade or so to create a business model that will replace the depository funding that was once created by sales of tangible products.

Level of Support from Regional

Our regional serves three states and has limited resources available to devote to depository functions. It is also a Patent Depository and is actively involved in cartographic services. Thus, we receive less support than we would sometimes like and our Regional is definitely not a leader in the government information community but we primarily attribute this to lack of resources rather than intention or choice. Within the last 3-5 years our Regional did query those of us with old and large collections to see if we were interested in assuming responsibility for Regional status in [state] and [state]. None of us have been able or chosen to do so. We have been a U. S. depository since 1907 and currently select about 80% of the available items.

Our Regional hosted a conference in 2001 that examined many current and future issues. However, with all the virtual communication avenues available, there still is a real lack of important dialogue and information sharing that would strengthen our depository community.

We have a very good one-on-one relationship with our Regional Depository Librarian (he & I have an informal agreement that I monitor & send him any relevant postings from Govdoc-1) and he attended our recent New England 100th depository anniversary celebration. At that meeting, he presented a very good overview of his role and current conditions in the three states he serves. This is the very type of information exchange that needs to be developed and used on an on-going basis, not just at isolated events.

Given the geographic location of our Regional, we often serve as the de facto regional in the state of ... (we are 1 of only 9 depository libraries in the state). Along with ..., we are the largest and oldest U. S. depository in the state. At state-wide meetings we hear again and again that other libraries depend on the strength and depth of our collections, resources, and expertise.

Technology and Depository Libraries

With the increase in electronic government documents, digital projects, the continuation of new tangible titles, the existence of valuable legacy collections, and the transition in library space uses, it is to be expected that the nature of both selective depository libraries and regionals should change. A shared collection across states, as the Kansas/Nebraska model suggests, no longer requires that in every case a tangible document must move between libraries, but rather digital copies can be easily shared.

It is difficult to envision what role both selective and regional depository libraries will play in the future although it is clear that digital collections increase in numbers and importance while the paper, legacy collections need to be preserved and made accessible but perhaps not at every depository library. One challenge will be to identify key materials in legacy collections which should definitely be retained, for instance, because limitations in current digital technology make the digital surrogates less useful than the originals, or because the existing digital copies are not freely available to the public, or because of the value of the documents as historical artifacts as well as sources of information.

Collaboration and Depository Libraries

With our membership in the Boston Library Consortium (BLC) and our close proximity to Boston, we frequently work more closely with the regional depository in this group (Boston Public Library) and the other BLC libraries more than our own regional or the other depositories in our state.

Another group with whom we regularly collaborate is the Government Publications Librarians of New England (GPLNE). Because the highest concentration of Depository Libraries in New England is, by far and away, in the Boston area, this group tends to be more Boston based. The [regional] is, of course, part of GPLNE but its geographic location makes participation less frequent; it is a true "outlier" even in this day of virtual participation.

Such connections and networks may well be a national trend given all the cooperative and collaborative arrangements. There is often a pull toward the initiatives, collections, colleagues, and resources of the cooperative library organization which may or may not include the regional or other depository libraries in ones group. There are groups and then there are groups and the depository group may no longer be the most active or important for one's institution.

Within the last year or so, my regional library has offered two new services. I will speak about both of these services, along with the positives and negatives that are associated with both of them.

The first new service that my regional library has implemented has been a “Documents Group” on the social networking site Facebook. The group is a hidden group, which means members can only join by invitation. This site allows our regional librarian to communicate quickly with all of us selectives via email. We can also post N&O lists to the Facebook group.

This new service makes it easy for our regional librarian to send emails to us and allows her to have one place to check N&O lists. However, it does not guarantee that she will respond to emails. It is commonplace among the other selective depositories in my state to complain about slow and inconsistent follow-up to emails from our regional. Also, the new way to post N&O lists has come with a “no news is good news” policy for discarding items. We post our lists, and if we haven’t heard back after 3 months, we are to assume that we have permission to discard the items. This 3 month period has cut down on the lag time in hearing back about permission to discard, yet it also means that we never receive that definitive “yes” giving us permission to discard.

The second new service that my regional has implemented has been a series of talks that the regional librarian offers in conjunction with other librarians from the State Library. I hosted one of these talks at my university library, which proved to be very successful and allowed me to conduct some excellent marketing for the government documents.

While this new service contributes greatly to the marketing of government documents, I feel that the service comes at the expense of other, more basic services which my regional has spoken about but which have not yet come to fruition. When I first become a documents librarian three years ago, there was much talk of revising and updating our State Plan, which dates from the 1980s. The Plan has not yet been revised. There was also much talk about seeking grant money for various projects coordinated by the regional. These plans have not yet materialized.

My underlying concern about all of these new services is the lack of personnel allocated to overseeing the regional library. As I understand it, my regional library oversees more selective libraries than most other regionals. Yet, my regional librarian wears more hats than just that of regional librarian. She has many exciting ideas yet lacks the resources, staff, and time to follow through on them. I see her inability to complete something as basic as revising the State Plan as a symptom of the steady decline in support that the State Library gives to government documents. My comments are intended to express frustration not with my regional librarian as an individual but with the overall low priority my state assigns to government documents.

We maintain a close and personal relationship with our regional. We seek one another’s assistance and have an exchange of ideas which makes for a pleasant and emergent environment.

Our regional provides the level of support we expect from a regional depository. They respond quickly. They offer suggestions. And they are willing to listen to suggestions or comments as well.

Our regional depository has not eliminated any useful or offered new, services to the selectives in our region within the last 3 years that I am aware of.

Our regional has recently undergone an organizational change and thus far it appears to be a positive one with a continuation of our close and personal relationship with our regional director and depository. The new Regional Director has relayed that her philosophy is progress for the betterment of access to our patronage. She wishes to streamline some procedures and go “green” with others. She also reminded us that the ... State Plan for Federal Depository Libraries will be reviewed and updated this coming year (the last time was in 2001). Even though she is new to the position, she is looking forward to meeting with everyone at the ... Library Association meeting in the fall and at the winter depository meeting. She is open to suggestions or comments on things that may not have worked in the past or any comments we may have. We look forward to working with her and aiding her as she needs.

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1. Given a choice between fewer, but healthier, regional depositories, or none at all, to cover large geographic areas of the country, we would definitely choose the former.
 2. Obviously, Congress needs to revise Title 44 to promote cooperation and innovation among government documents depository libraries, so the program can continue to exist. A failure to do so will jeopardize the voluntary program.
 3. ... supports the statement submitted to GPO by the Association of College and Research Libraries (ACRL) this week. ACRL supports the FDLP employing cooperative models and practices that might improve public access to federal depository resource. As stated above, we're already doing that among the....
 4. The amount of time the Joint Committee on Printing (JCP) allowed for the Government Printing Office (GPO) to respond to its query is ridiculously short and will almost certainly result in a poor response level from the user community.
 5. ... will not consider seeking regional designation, because such a status is not mission-critical for a private liberal arts college and we're too small.
 6. Our regional depository, meets our basic needs. It does the very best it can in its role as a regional, given the pressures of poor and unpredictable state funding and the competing priorities it faces.
 7. The State Library has been supportive of the ... project to consolidate our four collections into one. Likewise, they have long hosted meetings and kept communications flowing in the [state] government documents community.
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In [state], money is very tight for all public entities, and depository libraries suffer the consequences too. In addition, many depository libraries are also now defending their role to library directors who believe all government documents are electronic and depository status is no longer necessary.

Amidst those struggles, putting our depository role in jeopardy, [state] regional depository libraries provide services and access to documents which are invaluable. Both of the [state] regional depository libraries more than meet their obligation to "...provide interlibrary loan, reference service, and publication disposal assistance to depository libraries." On many occasions I have called upon each of them for ILL, help answering patron questions and always list materials before they are withdrawn. They never let me down.

The [state] regional depository libraries go beyond what is required. For example, they call meetings twice a year to gather all depository librarians to share news, get to know how we can all help each other and provide training. They also offer training and cooperative networking with neighboring states including Arkansas, Kansas, Missouri and Texas.

No doubt, "...current and projected conditions of regionals..." is dim in terms of funding and often support from their library directors, but the regionals in ... are expanding access to the depository materials in every way possible.

Our regional has always maintained a high level of strong support for our selective libraries. Through our library's renovation in 2005 after the retirement of our document librarian at the end of 2004, our regional librarian and her staff provided us with very strong support, which was most gratefully received by me, the document assistant, and by our then newly-appointed library director, the Associate Dean of Learning Support Services.

That having been noted, a high level of support is extended by frequent and active communication between our regional and all of the selectives through a network of announcements and information via several listservs. Our regional also employs a widespread outreach policy broadcasting events and news taking place with GODORT of [state] , [state library association], and their parent groups.

I don't recall that any regional services have been eliminated since I hired on in 1997. However, within the past three years our State Plan has been updated, new officers were elected to the [state] Council, regional disposal procedures have been updated and streamlined, and workshops have been offered to all depository staff at all the selectives. Currently, collection development workshops are taking place at several locations around the state.

Several outstanding actions by our regional come to mind. When our other and former regional changed its status to selective, meetings were open to all depositories in the state at which the entire process and its fall-out and outcome were announced and discussed. When an Alabama depository asked for input of fresh ideas for dissemination of govdoc resources, our regional made that request available on our listservs so that we could offer help, indicating a characteristic encompassing, rather than insular, approach to depository management.

Also, collections have recently been moved and facilities renovated at the regional in order to improve service to patrons and selectives.

Lastly, our regional was instrumental in reopening a dialog between GODORT of [state] and

[state library association] regarding a combining of memberships. The issue is highly charged, and our regional is very capably guiding the political and practical nature of the discussions.

Our regional is always mindful of the responsibility of the depository program and the gravity of its function. Depository business is carried out with great attention to detail and with the goal being a high level of accomplishment.

The Regional Depository has been very responsive to any request or need that I may have had in the past as a selective. I feel that they are doing a very fine job of keeping us informed through our current [state]GOVDOC-L listserv, as well as, through our annual meetings with the [state] selectives.

... has been a depository library by Senate designation since 1893 and has a collection that is rich in historical documents as well as current. The fact is that we are a selective library and do not have everything that we may need to help our patrons. This is where the Regional Depository comes in.

Our Regional is vitally important to us in the fact that when we do not have those publications on our stacks, we rely on our Regional. I am very happy to say that our Regional comes through for us. Not only can we request items from them, they provide reference, answer questions and give us assistance whenever they can. I feel that ... has a very good working relationship with the Regional and look forward to many more years of a great working relationship.

The only suggestion that I would have is that I would like to have more training/workshops in the ever changing world of government information. Things are changing so fast that up to date workshops/training sessions would be useful in learning where the information is and how to retrieve it for our faculty, students and patrons. This can pose a problem also because ... is a very big state and with budget and time constraints, it is hard to have all the depository libraries come together. There are so many misconceptions about documents that I feel we need to educate ourselves as well as our patrons that come in to our libraries in that way we can better serve our patrons.

While our regional librarian makes every effort to serve the selective libraries in this state, his position is not devoted full time to government documents. It is therefore not possible for him to provide the kind of support to the selectives that he believe he should provide, including training. In the three years I have been at this library, there has never been any formal training from the regional. We have had site visits with informal training, which are helpful. Otherwise, our regional librarian is sometimes very slow to respond to questions, and again, this is not the fault of the person but the result of not enough staffing at the regional.

The [regional] Library has been very good about responding to our questions (about retention rules, and access to NTIS, to name two). It has also led the way on the creation of a new state

plan for federal depositories.

It has not been active in creating a training program for depositories, although admittedly there has not been much demand for one. I would appreciate a web presence run by the State Library for federal depositories.

One reason the [regional] Library may not be more active is that our government librarian organization, the Northwest Government Information Network, is very lively and has taken the lead in a lot of matters. Of course, the State Library plays a very active role in NGIN. I can recall several occasions where the members had to stop at a meeting to think about whether they were acting as NGIN or as the federal depository librarians group; since the membership and activities are much the same. An example of the relationship is the NGIN Listserv, run by the University of Washington, which is often used to pass information through the depositories.

It is important to note that a few years ago the [regional] Library was threatened with closure. This would have been a disaster for the state's depositories. As it was, many people were laid off, including the federal documents librarian, who replaced her, has done an excellent job.

We are not interested in becoming a regional depository.

I have fewer concerns about public access for a two- or three-state shared regional like Kansas-Nebraska than about 15-state shared regionals, which at first seemed to be what ASERL was proposing. I am against many-state shared regionals precisely because I am convinced that public access would decrease.

Whether two- or three-state shared regionals impair or improve public access, however, depends on the guidelines and strictures that GPO sets. Public access is not likely to be impaired unless guidelines like these are in place:

- (a) In a two- or three-state shared-regional area, shared regionals should continue to guarantee no-fee access to selectives and the public. There shouldn't need to be no delay in filling requests from selectives in just a two- or three-state area.
- (b) Shared regionals should set up a selective-depository advisory group to insure that selective depositories' needs were being filled and that selectives had a regular way to communicate their concerns.
- (c) Shared regionals should maintain web pages, wikis, and/or blogs so that selectives would know which regional to contact to supply publications from what agencies and so that individual depositories would have a quick way to express concerns and get responses from other depositories (both regionals and selectives).
- (d) Shared regionals should pledge to work (perhaps with selectives) to get more of regional holdings in the public catalogs and on OCLC.

(e) Shared regionals should cooperate with other regionals to guarantee a comprehensive program of redundant preservation of electronic publications. This will need to happen regardless of whether there are shared regionals.

While I agree that the current system regarding regional depositories needs a little work, I think it should be kept intact. Rather than eliminating regionals, they should be given more support.

Having more, rather than fewer, regionals would make the system work better, as it would alleviate the workload of all regional depositories. A good option would be to change the part of the law that states each state can have only two. Those states with a higher number of selective depositories should have more regionals as well. This would make the workload more manageable, thus giving more libraries an incentive to become regionals.

Similarly, providing some sort of funding for regionals might also encourage more libraries to accept the task. It is difficult for depositories to sell the idea of becoming a regional to their administrators if they must utilize their own resources without any other support.

In short, it is management and funding issues that need to be addressed. Doing this will alleviate the difficulties that many depositories are facing and will ensure that the system works the way it needs to.

We are a selective depository and are most appreciative of our Regional contact at the [regional library]. Helpful and responsive to questions, tolerant of our discard lists and many mistakes. He is a great watchdog for all libraries and it is reassuring to know that every detail is cared for and attended to.

... is a selective depository library in the Federal Depository Library Program. ... has participated in the program since 1889 and currently selects 75% of resources distributed through the Government Printing Office.... is the largest selective depository in ... and leads in holdings of over 584,000 volumes in all formats.

... is designated as a high research institution with significant undergraduate and graduate programs in Agriculture/Biological Sciences, Nursing, Pharmacy, Education and Counseling, Engineering, Family & Consumer Sciences, General Studies and Arts & Sciences. Government publications from all agencies provide support for academic programs at ..., Cooperative Extension, and resources to the residents of

Prior to 1987, [state] Selective Depository Libraries were not served by a Regional Depository Library. There was no designated Regional Depository Library within the state of In 1987, the State Library of [state] entered into an agreement with the ... Regional Depository Library to serve the selective depositories in [state]. This partnership allowed [state] selective depositories to weed their federal documents collections with the approval of the Regional. Without a regional library in [state], selective depositories were unable to discard or disperse documents.

Special projects, space considerations, future organizational changes, electronic dissemination of government information, bibliographic access to pre-1976 documents, and preservation are dominant issues facing [state] federal documents collection management decisions. To face these challenges, it is necessary to have guidance from a Regional Depository Library. The [regional library] has served the selectives in [state] very well and we continue to look to the [regional library] for leadership in managing our collections.

It is unlikely that any [state] selective depository has the resources or the desire to assume the role of a Regional Depository Library. Therefore, we respectfully support legislative action to amend Title 44 to allow current and future Regional Depositories flexibility in executing their mission within the Federal Depository Library Program.

The ..., a selective depository in the ... is situated 3700 miles from our Regional at the Consequently because of our remote location, our relationship with the Regional is especially significant. What is appreciated is the expertise and specific knowledge available of this region by Regional personnel, which supports the unique information needs of our patrons. This relationship is actually an information life-line, one that impacts not only the ..., but the local and surrounding island communities as well.

Facts:

1. The regional librarian has been helpful to the selective library. When we requested, the librarian gave us on-site visit and provided her suggestions regarding collection development and processing.
2. When we sent discard list, regional librarian provided approval.
3. During 2008 Spring FDLP conference, regional librarian called all selective depository libraries for quick meeting during lunch time, introducing each other, sharing ideas, and answering questions, which was very helpful.

Comments:

1. According to FDLP Handbook, regional library should provide state plan to selective depository libraries. ...regional library does not have a state plan. We were told the latest state plan was 1980's and no updated one.
 2. FDLP should provide specific guidelines or training to NEW regional librarian about their leadership role and corresponding responsibilities to selective libraries.
-

I fully support making Regional agreements more flexible, including allowing for cross-state and multi-state Regional libraries. Some points I want to make:

- 1) The new partnership agreement we've concluded here in ...(with the State Library as the Regional, but the collection housed at 3 major academic libraries in addition to the State Library) addresses many of the space concerns implied by the survey, and using a committee of veteran librarians through the state library association's documents group as resources and trainers. Our

model may be useful for the JCP to consider.

2) It is vitally important for GPO to focus on obtaining increased Congressional funding to digitize and catalog older documents, as this would release much of the pressures on both Regionals and Selectives concerning their lack of space, and also would make fewer Regional libraries necessary.

My reaction to the idea of a super regional is mixed. I am the government documents librarian at a selective depository in [state]. The idea of a super regional was presented to the [state] Library Association's Government Documents Roundtable as something that was to be implemented very soon. The depository community was given no voice in the decision. I discovered that ILL would be a problem in my library. [Other regional] wouldn't lend to us because we weren't in their lending group. We were all getting a new regional librarian at [regional library]. He had no documents experience. The position was to quarter time. In my 22 years in government documents in [state], the position has gone from a full time position with a department with 4-5 full time people to one where the librarian is quarter time and I have no idea who contact if I have a processing or technical problem. I question [the regional library's] dedication to being a regional. They sure don't seem to be very willing to staff the position in the way that would serve the region it covers. I look at the idea of the super regional as a way to put a weaker regional with a stronger one. In the case of Kansas and Nebraska becoming a super regional, I believe [the state] would come out on a shorter stick than they are one now. GPO really needs to look at what it expects regional's to do. In two rural states like Kansas and Nebraska, distance has to be a factor. In [state] we have a strong government documents group that has a listserve. This is where most of the librarians in the state go for help! Before any area goes to a super regional, all the stake-holder must be involved in the process. This is the only way it will work for all participants.

The ... serves as the regional to my selective depository. The staff there do the best job they can, given severe budget and staffing cuts in the past 10 years. [State] has the benefit of a shared light archive, which is a wonderful resource for all depositories in the state.

Currently, the Regional Library at the... also serves as the regional library for the FDLP libraries in [state]. Were the [other state] Regional not serving in this capacity for us, it would be difficult for the [state] Library to remain a selective. This is particularly so in regards to dealing with discard items. Space for collections is at a premium in our building and being about to weed on a regular basis allows us to keep the documents collection to a size that will fit in the available space. We also rely on the [other state] Regional for reference assistance and training. We feel having the [other state] Regional serve as the regional for [state] FDLP libraries is a good use of resources.

Our library has a very good relationship with our regional depository library. It provides the level of support we expect from a regional depository. Specifically, the staff reviews our disposal lists and answers reference questions in a timely manner. They respond to interlibrary loan requests

very promptly. They also provide training and guidance in depository management. Of particular value is the day-long workshops they have recently implemented to provide training to new depository staff. The staff provides timely updates on issues of significance to the FDLP community. The staff is very courteous, helpful, supportive and clear in their directions to the selective depositories. Our sense is that they accomplish all of this despite the fact that they have very limited funds and staffing, especially given the large number of selective depositories that they serve.

Our regional depository library has recently been re-organized in part due to anticipated budget cuts, but we have not yet noticed any impact on our depository's operations. However, given how recent the re-organization is, it may be too soon to evaluate its impact on services to selective depositories.

Does your regional depository provide the level of support you expect from a regional? Support and communication from the regional depository library is minimal. My library has received one in-person visit from the regional depository librarian during the course of 3 decades. While my library as a selective is able to fulfill its responsibilities, more active care, collaboration, and contact within my region would be appreciated. Training sessions, information and news about other selective libraries in the region, and updates on FDLP from the regional point-of-view are examples of outreach that the regional could be doing. Some of these needs are met through the regional government document librarians' group but the regional depository should be fulfilling them, too.

Has your regional depository eliminated any useful or offered new services to the selectives in your region within the last 3 years?

To my knowledge no services have been eliminated or new ones offered within the last 3 years.

Has your regional depository undergone organizational changes that positively or negatively affected the depository operation or processes in your library?

In 2003 the library hosting the regional was affected by a significant budget cut and large-scale organizational change, moving from independence as a state agency to being directed by another large state agency. There were personnel changes at that time and for a period of time thereafter that left the management of the regional depository unclear.

This did not affect the depository processes in my library but support and direction from the regional was either nonexistent or unclear for periods of time.

There seems to be a situation of understaffing for regional depository operations at this point.

Would you consider seeking regional depository designation for your library?

No

The ... Regional Federal Depository Library and the Regional FDLP Librarian are exemplary. [The regional librarian] communicates with the depository libraries about issues and trends related to FDLP in bi-monthly meetings of the Documents Association of [the state], via regular

email communications forwarding information about the FDLP, and in very timely responses to reference questions from our depository library. If there is a need to interlibrary loan material or fax material, [the regional librarian] follows through to ensure that the material is received as quickly as possible. Laura was instrumental in guiding the process for our State Plan. [The regional librarian] has also carefully planned and widely advertised exhibits of government documents, including the exhibit, “Window to Your Government: An Exhibition Celebrating the Centennial of the Federal Documents Depository”. She also participates actively in the planning of the annual [state documents association] fall conference, which focuses on promoting government information. [The regional librarian] has participated at the national level in the FDLP and regularly shared information with us about the issues facing depository libraries. These regular communications foster a relationship that encourages access to the Regional’s collections – a necessary collection for our state since no other library in our state can possibly provide a complete print collection of documents.

The role of the regional should include: support for Selectives, training, advice with management issues, and sharing their expert knowledge of government information.

The Regional is GPO at the local level - providing interpretations, explanations, and updates of policies and regulations. In my case, my Regional facilitates the Government Publications Interest Group presenting opportunities for depository librarians and staff to exchange ideas, share best practices and knowledge about collection strengths and areas of expertise. In addition, the Regional is the leader in formulating, implementing and carrying out a state plan.

Training in both content of GPO and government materials, as well as in managing the collection (collection development, processing, cataloging, etc.) by the staff at the Regional and encouraging presentations from Selectives.

Catalog and records are critical to access and maintenance; depository Libraries need to have every tangible item cataloged at the piece-level. This is needed for local access but also for referrals to the Regional for collaborative collection management, interlibrary loan, copy-cataloging, and verification of the existence and holding of government publications. My Regional has been committed to catalog and item convert its holdings.

Briefly mentioned above, the Regional has a lead role to play in provision of document delivery services.

Selectives need to an expedited discard process run by a well staffed Regional so the process is conducted as quickly as possible.

As a smaller Selective, I really benefit from the activities of the Regional. My have questions ranging from managing the collection, to requesting items not owned, to assistance with reference inquiries. My Regional has been knowledgeable, helpful, and timely in its responses.

Our Regional Librarian has always been extremely supportive of our selective depository. Our Depository collection was transferred from the ... in 2001. In preparation for the transfer, [the regional librarian] evaluated our library, advised on the transfer process, physical placement and access to the Depository collection. More recently, she advised us on physical layout specifications during a recent library remodeling project that directly affected the Depository collection.

[The regional librarian] has always remained available to advise and provide support and communication on any Depository-related matter. She ensures that the [state] Depository Library Council meetings are held soon after the Fall and Spring meetings of the Federal Depository Library Council, in order to keep us informed on recent developments. Attendance in person is encouraged, but she has provided opportunities for those of us in outlying areas of the state to attend meetings via speakerphone and online meeting software.

As the [state] Coordinator for the Institute of Museum & Library Services/Government Information in the 21st Century Grant, our Regional librarian has been extremely supportive. She has provided funding so that [state] depository librarians have been able to attend two IMLS "Train the Trainer" conferences in Colorado. She has provided advice and much administrative support to facilitate IMLS workshops presented recently by myself to [local] area librarians.

Recently, severe funding challenges have faced the [regional library]. It is essential that funding remain adequate to support our Regional Depository Library. The Federal Depository Library Program is extremely important to our community for several reasons. We are physically distant from other Federal Depository Libraries and large metropolitan areas (approximately 180 miles from the nearest Depository library in Arizona).* Our county serves a large minority population (55.9% of Hispanic/Latino origin).* [local] County's unemployment rate is over 9%.* The percentage of persons living below the poverty level is over 18%.* Large employers in our area include education, agriculture, and the Federal government (military and civilian employees). Our Selective Depository Library is housed on the major campus for public higher education in [state]. Our Regional Depository Library and Regional Depository Librarian play a critical role in keeping [state] informed.

My experience has been that for me in [territory], the major contact I have with the regional library is to send in discard lists and not much else.

We are geographically isolated by miles of ocean and that makes any real contact or service difficult. I suspect that my perceptions are true for any of the depository libraries located in US territories.

With the approval of my library director, we are taking the initiative to invite the [territory] and [territory] depository librarians to a meeting on August 22, 2008 to discuss collaborative possibilities including the idea of a shared regional.

In its response to the survey questions, our regional library director stresses the importance of collaborative efforts. However, the state served by my regional doesn't have a state plan. Despite repeated calls from the selectives, and offers from selective depository librarians to work on a

state plan, the regional has not taken a leadership/coordinating role in developing a state plan. The lack of a state plan has enabled a group of library directors of selective (state university) libraries to step into the void and begin their own planning for coordinated weeding/downsizing tangible government documents collections in the state university libraries. Once again, I see no evidence that the regional is providing any support for the selective depositories that are trying to retain an appropriate documents collection for their institutions.

In general the regional library system is very valuable for its complete collection of federal documents. Having more flexibility in sharing responsibilities would not decrease its value, and could improve the services for selective depositories. Certainly our regional has fallen short of our expectations in that it rarely provides staff development or collection development assistance. The regionals may need assistance from other partners to provide services that would improve the program.

The State of ... is represented by two regional depository libraries.

The [regional librarians], over the past 15 years, has been the leader in educating the staffs of the selective depository libraries. They have provided training sessions for government databases, hosted the biennial depository libraries meeting and the regional meetings, they were actively involved in and coordinated the writing of the State Plan, and they currently host the directory of all depository libraries in ... on their web site and post news relevant to the GPO. [The former regional librarian], the former regional librarian at the ... Library, was a founding member of the 3-States Depository Library Conference, which later evolved into the 5-States Depository Library Conference. This conference can be a model for other states that wish to coordinate inter-state depository conferences. [The former regional librarian] was also a member of the committee that proposed the IMLS Grant, now in its second year of funding. The project provides excellent training modules in a large variety of topics.

The regional depository at the ... has taken a secondary role in leadership in the state, responding to queries when requested, but with no proactive approach to educating the selective depository library staffs.

The regional depository at the ... underwent a major organizational change in 2006. At that time the Government Publications Department was subsumed by the Reference Department. There have been no differences in services provided since the merger.

Our Regional depository librarian in ... has been very helpful in guiding those of us who are new to the depository library system. He has organized one-day informational sessions for new depository librarians, and makes it a point to offer his services whenever I run into him at FDLP conferences. He occasionally requests items from our N&O lists, and he has been advising me on what the FDLP expects from libraries undergoing renovations. David attends the local [area] Documents Network meetings which are usually held twice a year. He also informs us of new developments from GPO which might affect us at the selective depository level. He does a great

job, considering the number of selective libraries in the state, and the fact that they must deal with budget constraints at the state level.

I expect a regional to support the selective depositories it serves. This includes advice, assistance and review of titles to be withdrawn from a selective plus having a larger collection for Interlibrary loan and referral (though our regional is a day's drive away--from ... to ...--so sending users there isn't really practical).

At this time, we actually have one of the very best regional librarians in charge of the regional that we have had for a long time. It isn't that the others were awful, but rather than [the current regional librarian] seems to be really good at it; he truly cares, communicates clearly, asks what people need and genuinely listens, and is trying to do the very best he can for all the federal depositories in [state] with what he has to work with. He has held sessions for new depository librarians, thoughtfully reviews our withdrawal titles, aided our library in replacing a volume of the Serial Set Catalog that became missing from our collection and has sent fiche copies to us when we needed interlibrary loans of hearings. All of this has been much appreciated.

Regionals, many of which are state funded institutions, face challenges in maintaining large tangible collections at a time when digital is more trendy and legislatures are hard pressed to fund the needs of libraries.

Our library's relationship is a good one with our regional . [The regional librarian] and his staff are available by phone and email when issues and questions arise. The librarian in charge of our depository attends meetings where the regional is represented by [the regional librarian], or his staff, and on occasion, hosts [the regional librarian] here at the

My library is a small, private, undergraduate college in [state]. We tend to be understaffed and under funded, and the federal government documents provide valuable resources for our library and for people in the community.

Increasingly, we are turning to electronic formats for information resources. Not only does this save on limited space, but it makes the information resources accessible any time of the day or night by users who may be on or off campus. That is important to us since we have programs at off-campus sites, but also many of our students prefer the electronic formats. They may be easier to use and search in addition to being more accessible.

Our regional depository has worked to help documents libraries plan to meet changing environments. They have worked with us to help us understand how to provide the resources our students need and use and how to maintain them effectively. They have helped us address space issues and to see what is available electronically and how to incorporate electronic resources in our catalog. They have made it possible for us to continue as a selective depository. Their staff are very capable and responsive to our needs, but I know that recent staffing changes (and

currently open positions) have made it difficult for them to manage their responsibilities effectively.

[State] Libraries receives a strong level of support from our regional depository library at the It is likely that the strength of this relationship will not be diluted by a shared regional model, particularly as ASERL's Collaborative Federal Depository Program appears committed to creating standards of service that will preserve the guidance and mentoring responsibilities of our regional library.

Regarding tangible collections, selectives' current level of access will not be lost if there is a reliable document delivery system among the regional libraries. This will allow us to maintain the ability to refer patrons to our regional library, a one-hour drive from campus. However, this is already becoming a rare occurrence as libraries' retrospective cataloging efforts continue to make depository items more accessible through interlibrary loan.

Given the changing nature of depository services, specifically the decreased focus on tangible collections, the support that we receive from our regional depository library should not diminish with the creation of a formal collaborative arrangement with other regional libraries. In fact, cooperative collection development may allow staff at regional depository libraries to allocate more time to assist selectives with reference queries, outreach, and other public service duties. A shared regional model that gives regional depository libraries some flexibility to provide the best service for patrons will in turn allow them to provide better, more efficient service to selectives. I do not think that the current ASERL proposal or a similar plan will have a negative impact on our relationship with the [regional].

Regional:

Communication from the Regional to the selectives has always been superb. [The regional librarian] updated selective representatives at semi-annual regional meetings with updates from the FDLDP conferences and council meetings. [The former regional librarian] (when she was the Regional Librarian) also was committed to regular communication, and had a strong bond with the selectives. There has also been regular communication of updates through the GOVDOC-TALK listserv (the listserv for our Regional). [The regional librarian] would also make an effort to gather together selectives reps attending the FDLDP conference for a regional lunch meeting during a conference. The Gov Docs and Maps website at [regional] Library also provides relevant information and assistance to its selectives.

[The regional librarian] kept Needs and Offers running pretty smoothly considering she was the only staff member there who maintained this process for the Regional and its 64 selectives. [The regional librarian] replies to our Needs and Offers were very prompt.

The regional has very supportive of their selectives' efforts; they sent two representatives to supporting our 40th depository celebration. [The regional librarian] also held workshops for selective staff, as "hands on" training for new documents staff. One of our staff attended one, and

it was very helpful to see what the regional does on a daily basis and to see the Government Documents and Map departments.

There seem to have been internal issues at the [regional library] concerning their role as regional. There is still no permanent Regional Librarian replacement for [the former regional librarian] (who left in 2006). ... is still acting head of Gov Docs and Maps there, in addition to her other duties and does contact the selectives through the GOVDOC-TALK listserv with some updates.

Our regional is certainly special. Because ... is included in this region, the GPO and government agencies in [state] and [state] that supply many of the government documents through the FDLP fall under the Regional – they, too, are selectives under this Regional. There always seems to have been a good relationship between the Regional and the GPO - one that gives this region a special edge. GPO reps have always attended the Regional/Selectives meetings, and eagerly field questions from the selectives - which again gives our selectives a great edge - we get additional in person updates from the GPO at times during the year in addition to the FDLP conferences.

GPO:

Communication has improved with the release of the new improved FDLP Desktop and the CGP. There are regular updates on the FDLP Desktop community, and through the FDLP-L listserv and FDLP Express (soon to replace the listserv). Responses to direct email questions, through the AskGPO help line or to Web claims from GPO reps are more prompt. The updates at the Fall 2007 conference were some of the best yet. GPO initiatives of the FDsys and the Public Access Assessments are much welcomed. With the Public Access Assessments, the GPO is now resuming its role to better communicate and help selectives. Shipping of items still could see some improvement. Since GPO switched to UPS, there has been a lot of confusion about the look of the new shipping labels, especially with the separates. It is sometimes very difficult by the packaging to determine that it is a shipment from the GPO.

With the release of the new FDLP Desktop, the GPO has found a greater role in supporting and promoting its depositories in the FDLP, where articles and calendar functions can be entered. We appreciated the publicity for our 40th depository celebration. We appreciated having GPO Rep attend and present at our 40th celebration.

As the head of the selective federal depository library, I would like to submit my comments about my regional library.

First, let me state the level of support to my library as a selective by the regional depository has been excellent. The regional has established clear communications to the selective libraries, and organizes at least two meetings a year. There are also a number of collaborations between the regional and the selective libraries, including the recent work on the Government Information in the 21st Century (Gi21) grant.

The regional library has offered new projects over the last few years in that support the work of the selective libraries, including:

- The purchase and support of meeting software for use by geographically distant selective libraries.
- Harvesting [state]-related federal documents to ensure continued access.
- Working with the selective libraries to schedule training programs throughout the state as part of the Gi21 program.
- Subscribing as a partner to the library online community website WebJunction.

As the FDLP has transitioned to electronic publications, the role of the regional libraries has also transitioned from storage of government documents to providing services related to government information. The regional depository has done an excellent job of supporting that same transition in the selective libraries it supports. As a selective, I am confident that my regional library would support any program that I would proposal to increase the access to government information for my constituents in....

I have been a depository library coordinator since July 1997 and have administered collections in both [state] and [state]. Both of these states are served by two regionals, one in a state University and the other in the State Library. [One state] has 18 selective libraries and [the other state] has 57.

I was very fortunate to begin my career as a depository coordinator in ...under two of the finest regionals in the country. Within my first week on the job, I had been contacted by both the regionals to welcome me and offer any possible assistance. They both came for an onsite visit and allowed me to visit their respective depositories. I received in depth instructions from them on how to handle discards, collection development, and become involved in the depository community. They took the time and initiative to get to know me and my strengths and weaknesses. They also made sure that I was thoroughly informed of training opportunities. It was clear to me from the beginning that I was not alone and could call on them whenever I needed assistance.

During my 10 years in [state] as a depository coordinator, I was able to flourish under the mentoring of my designated regional. He provided me with direction and guidance and helped me develop my reference skills. In addition to working with [regional librarians], I had the great pleasure of working with the other [state] regional. [Other regional librarian] and I collaborated on several training events and he also helped to assist me in my development as a depository librarian. I think that the situation in ... proves that the regional system is a sound system for administering the FDLP when the guidelines established are followed.

Last August, I moved to [state] to work at the [university]. I have been very frustrated by the activity of the two regionals in the state. There is no coordination of training efforts, no communication with selectives, and no mentoring. Since GPO began this study of regionals I have noticed a brief sign of life from our regional. A recent email went out to the selectives on how to handle discards. To my knowledge, this is a first.

In November, I attended a meeting of the [local] Regional Documents Librarian Group. There were no fewer than 5 new depository coordinators in attendance who had no idea how to

administer their collections. In January and February I visited each of these librarians to try to give them some advice on what gems were in their collections and how to use tools such as the FDLP Desktop and the Documents Data Miner.

This last month, it came to my attention that a selective in the [local] area was having difficulty convincing the director that her documents collection was worth keeping. She is on the verge of dropping depository status. I have alerted the regional to this situation, but I have little hope that anything will be done on their end to try and assist the selective in maintaining depository status.

I have found myself contacting the two [other state] regionals multiple times since moving to ... for help with questions and guidance. In addition, [regional librarian from former state] and I are still collaborating on training opportunities for other depository librarians. Some of these are in [one state] and some in [other state].

From my experience in [state] and [state] I have to say again that the system works when the regionals adhere to the guidelines established by GPO. If the regionals do not follow the guidelines, then the system is useless. I encourage GPO to look into how to more stringently enforce the guidelines. If a regional is not willing to fulfill all their duties then perhaps the state can be canvassed to see if another depository would be willing to step up and take over the regional duties.

Our regional depository has seemed quite inactive in the past 3 years. The only thing I would contact them for right now is permission to dispose of items. Occasionally we receive a message from them via e-mail. They used to hold biennial conferences but that doesn't happen anymore. Some of these conditions may be ascribed to lack of money and or support and others to changes in staffing.

Law Libraries

Since taking over our regional depository in ... a few years ago, [the regional librarian] and his staff have vastly improved communications and the processing of our offers lists. He is a consistent visible presence in our community, online and in person. For the first time, staffers thoroughly review the lists and request documents to fill in their collection. They patiently guide us past our mistakes and encourage us to attend meeting and workshops. Given the recent reorganization in [regional library] due to budget cuts, I am sure their jobs will be harder and list processing slower but the job will be done. Kudos to all of them

As a Selective, we received a letter from GPO dated April 22, 2008 soliciting our comments and suggesting some topics we may want to cover. Here are our responses:

- We are not interested in becoming a regional ourselves
- No useful services have been eliminated in the last 3 years
- New services have been added, namely the addition of a Wiki whereby Offers are announced on a regular basis, and their "request by" dates clearly displayed. This has streamlined the discard

process and made it much easier for all involved.

- Some new personnel arrived at our Regional in the past year. This could have disrupted the previous level of service, it has not. Both communication and service have continued to meet expectations.

We share an online catalog with our Regional and attach our holdings to their Marcive record. They have a backlog of the Marcive tapes and it would be helpful if federal funding was provided to allow faster loading of the tapes. Another person doing/helping with tape loads would be desirable.

The procedures for discarding/withdrawal of materials should be streamlined. (I know this is not really a Regional decision.) Each Regional should be able to make decisions for what the Selectives in the area should do to withdraw items. They should know what is needed and what is not based on prior demand and inform the Selectives accordingly.

Thank you for taking on this task and for allowing the community an opportunity to comment on the process. It is extremely important that JCP have a full understanding of the situation in the FDLP; not just in the regional libraries but in the selectives as well. I was pleased to see that you have included a section devoted to the effects on selective depository libraries.

[State] is served by the [The regional library] is also the regional library for all FDLP members in the [state], [state] and [state]. This includes the federal libraries in and around [city]. It is probably the most diverse group of library types served by any regional in the system.

Our regional library has played a leadership role in the region but it has also benefited from capable and talented individual librarians in the area being served. Accordingly, the regional library has not had as great a need to 'stand alone' in providing leadership in the region. Certainly past regional library coordinators at the [regional library], such as ..., have offered the guidance and leadership one would expect from a regional library but the reality in the [regional] area is that a style of shared leadership has developed that is not dependant on the familiar hierarchical structure of regional to selectives.

Within the [region] the regional library has been instrumental in taking the lead to coordinate technical services functions, particularly the creation of individual and joint bibliographic loaders to improve access to government documents. The regional library has also been very helpful in coordinating and processing the discard lists in a timely manner, allowing for more efficient collection management at the local level.

The [regional library] has recently released a report that proposes to restructure the level of service provided to the region. They have been cognizant of the need to involve the selectives they serve in the creation of this report by involving members of that community in the process. It remains to be seen how their proposal, if approved, will affect access to services and resources across the region.

I want to conclude by urging you to also consider a separate section within the report to the JCP that will address the situation in the law library community. Yes, these are selectives but law libraries occupy a unique role that is both independent and dependant on the regional system. Any change in access to the core resources located in a regional library will directly affect service in participating law libraries.

I'm the Tech Services Librarian in charge of the government documents collection at the Our tangible GPO collection consists mainly of legal materials (Basic and Essential). However, our reference staff refers customers to the Regional Library on the University ... campus quite frequently. Since [state] is so isolated, a Regional Library on the islands is essential. It would be difficult to have a share agreement with another state's regional collection. Although there is a lot of transitioning of documents from paper to electronic going on among the government agencies, we still need to have access to older tangible materials that regional libraries provide.

I have been the Documents Librarian at ... for less than two years. We are served by the [regional library]. Upon my appointment to the position, I was welcomed by our regional librarian with information about local and state resources for document librarians. Since that time, I have found [the regional librarian] to be an unfailingly helpful resource, in spite of her library's staffing constraints (which can occasionally cause delays in response, all understandable considering the large amount of selective libraries served by the relatively small staff at [regional library's] documents library).

My main interaction with our regional library has been in the context of collection review and withdrawal. ... recently undertook a small collection review, in order to discard items which had been flagged for withdrawal following the mandatory 5-year retention period. As directed by the FDLP, we submitted the list of publications to our regional library for approval. [The regional librarian] responded reasonably quickly, although she had recently lost a member of her depository staff and was overwhelmed with other demands. In addition to this one-on-one contact, [the regional librarian] frequently reaches her selective libraries via the state documents librarian listserv, to provide helpful reminders of approaching deadlines for FDLP duties (such as item selection and the Biennial Survey), as well as GPO requests for comment (including this one).

I have found our regional library to provide the appropriate level of support to our selective depository collection, although I am mindful of their current staffing and space issues. I would not object to a more flexible approach to regional library designation which would ease some of the hardships faced by regional depository libraries, although my own selective library would not be in a position to accept even a shared regional designation.

Your review of the regional depository libraries comes at a very appropriate time in our profession's work with digital information and government information of all types. On behalf of the Law Library at ..., I can say that our staff connects with our regional depository library on an

annual basis when we have depository items over 5 years old that we are ready to dispose of, which needs their permission. That is our basic connection with our regional.

We currently have an excellent working relationship with our regional library, meeting with the regional librarian periodically and updating her as to our discards/wants list. We have no interest in seeking a regional designation.

We also have concerns with the “shared regional” concept, if it would place users at a disadvantage in obtaining print resources. At present, users in [local city] who wish to consult government documents in print need to travel just one hour to [city of regional] in order to consult documents; if documents were sent to other libraries working in the “shared region,” their travel times would be significantly increased. Creating barriers to access is contrary to the purpose of the FDLP; forcing users to spend excessive amounts of time in visiting a shared regional library would be an access barrier.

As a selective depository we have been fortunate to have a very good relationship with our regional depository at the The kinds of support we have come to expect from our regional include: assistance in interpreting questions about GPO policies and procedures; reference expertise, especially in subject areas outside of the scope of our collection; administration of a regional needs and offers list; and the coordination of semi-annual meetings and information sharing among regional selectives. Our regional has been responsible for facilitating a dialogue between selective depositories that has been fruitful for all involved. For example, the [regional library] led in the creation of a state plan covering [state] depository libraries. In addition given our proximity to the Government Printing Office, the staff at the [regional library] has arranged for selective depositories to have direct access to GPO employees, including the Superintendent of Documents. The regionally-based needs and offers list has been particularly useful, allowing us to fill gaps while keeping shipping costs down and to place holdings elsewhere which no longer meet our collection needs.

Over the last few years the library system at the [regional library] has gone through a reorganization that has impacted government documents. Although the number of government documents staff has been reduced and there has been a significant turnover among highly qualified staff, the remaining staff has made every effort to maintain the level of service offered to selective libraries. One service for selective depositories which our library found useful was low-cost duplication of lost or missing microfiche. Our regional was forced to discontinue this service in 2005.

As a specialized library, we lack the expertise, space and personnel to undertake regional depository status for ourselves. Nor does it seem likely, in a region where law schools and other specialized selective depositories predominate, that a replacement could be found if [regional library] were forced to step down from its regional status.

Public Libraries

Regional Depositories in our state of ... have faced difficulties in the past few years. We have had a lot of turnovers in Regional Document Librarians. At the same time, the selective depository librarians have met the challenge. We are a close knit group, and the amount of knowledge within the state is awesome. These along with the Regional Depositories have worked well together, sharing ideas and knowledge.

Some concerns are the cataloging of pre-1976 documents. More resources are needed for retrospective cataloging at regionals. Quality cataloging records is very important to the document program, the selective depositories and the public we serve. This would help serve the needs of selectives in determining what to select or deselect.

Another problem is the lack of training for new regional librarians. This affects the regional and selectives as well. We selectives depend on regionals for guidance, information, and problem solving. They know us, our libraries, and have a good overview of the document collections in the state. Without regionals, the selectives would be like ships in the sea without a rudder. Regionals need to be able to help train new selective librarians. They need the ability to travel more to visit the selectives.

[State] is blessed to have an active Federal Depository Advisory Council. The meetings have good attendance, and ideas are shared. Some of us cannot travel to national meetings, so these state meetings are vital for us to stay up-to-date on changes, procedures, etc.

Even with the problems stated above, [state] is fortunate to have the best Regional Depositories in the nation. While our selective depository does not use regionals every week for reference, when we do, the staff is always prompt, helpful and caring. They make obtaining vital information a lot easier.

In our selective depository, the documents are interfiled with other items, and this works well for us. Our staff are not document specialists. They do a great job, but there are times they need assistance to better serve our patrons. The Regionals are always ready to help and provide Expert knowledge.

The Depository program in [state] is strong with very knowledgeable staff. And with that knowledge comes a deep desire to serve our patrons and help one another. Great Regional staffs and collections are a must. Regionals must have adequate staff and time to adequately serve the needs of their institutions and the selectives.

I do not have input concerning regional, but I know that my selective is being considered for elimination because of severe proposed budget cuts and subsequent staff reductions. I was instructed to respond to this survey and also to pursue the process of withdrawal from the program if these measures come to pass.

The ... is happy in our dealings with our regional depository libraries. We are contacted for discards and they are very willing to loan hard copies of anything we request to borrow. I have noticed no recent changes in their services. Our state library association's Government Documents Roundtable is a great source of information and a place where the documents librarians can get together and exchange ideas, solve problems and brainstorm.

My major concern is the drastic cutback in staff positions in Government Documents at the regional library. Budget concerns have taken them down to basically one full-time staff member. We have had initiatives and meetings cut back or eliminated altogether because the qualified staff is gone.

... is proud of our two regional federal depository libraries in [state]. The [two regional libraries] are both very supportive of the selective depository libraries here in Oklahoma for many years. The selective depositories have a good relations with their regionals. [The two regional libraries] provides leadership in guiding the selectives into the electronic transitions of the federal documents. They provide workshops to instruct their depositories personnel on the new federal electronic resources. They organized a meeting in which the depositories of the state could meet and discuss their concerns and achievements every year. They send emails to the state listservs keeping the selectives updated on the current issues. We are very fortunate to be able to call our regionals and have our questions answered in a timely manner. Our regionals staff are very efficient and their knowledge about federal documents is highly respected among the state depositories. I can't say enough praises about both our regional libraries. They are the best!!

In general, I only have positive things to say about our regional depository. [The regional librarian] seems to be doing a very good job of moving depository items and processes into the online world. She has started a state-wide meeting of documents librarians; the last two I attended (held every two years) were very interesting and helpful. I don't remember the previous regional depository librarian doing that. [The regional librarian] usually responds to questions I have within a reasonable time frame, and is quick to offer assistance when I need help tracking down a print document for a patron.

[The regional librarian] has recently made changes to how disposal lists are handled. I cannot yet comment on this change, as I only found out about it this week and have not yet had a chance to use the new set-up. It now involves creating a FaceBook account for the library and posting disposal lists on a special group run by [the regional librarian]. She did tell me that if I cannot create an account, or have problems, she would post my lists for me, thus providing me two ways of meeting my requirements for withdrawing old materials.

As a small public library, I depend on having a larger library willing to help me out when needed. I would hate to see the regional depository library system removed. Having a regional an hour away from us makes it easier; I would not be able to attend regional meetings if they were consolidated with other states, for example.

The regional depository for the state of ... is the ..., and the regional librarian is The [regional library] and [the regional librarian] have provided good support for the ... as a federal depository library. While our depository was making improvements to successfully pass probation, [the regional librarian] visited three years in a row to review our progress, look over the collection and make suggestions for further improvement. When we celebrated our centennial anniversary, she attended as a key speaker for the event.

There have been significant changes in the past five years that have affected the regional library and [state]. The event that had the biggest impact was [other regional library] stepping down as a regional library. There is now one regional library for the entire state of ..., which has over 40 depository libraries. This seems an unreasonable number of depository libraries for one regional library to support. In addition, there have been many state funding cuts, which resulted in staff hours being cut at the regional library. The end result is that there are fewer people doing the same number of tasks. Answers to questions and concerns are sometimes delayed, but always answered, eventually.

A useful service recently developed by [the regional librarian] was a collection development workshop. She planned several regional workshops throughout the state. The workshops focused on practical tools and tips for weeding depository item lists, and how to determine which items are best retained or selected for a particular depository users' needs.

Our regional depository library provides every service we have needed. The current documents librarian and his staff have trained our staff members and answered all questions we have. We borrow many items from their collection to meet our patrons' needs and are pleased at our affiliation with the depository program.

[The regional librarian at the] regional depository has been my source for answers to many questions since my becoming involved with federal documents. He has made himself know by coming to the [local] area on several occasions to present programs, training, and general guidance to those of us less well informed about the depository program. He responds in a timely manner to emails and, in fact, encourages questions. Additionally, he makes himself available at national meetings. All in all, he makes the regional depository an essential part of our system.

Our [state] Regional Depository has been a helpful resource for state related reference questions pertaining to legislative history. Patrons are provided with the information usually within 24 hours. We have never had a complaint, once the patron has made contact with [city of regional]. [The regional librarian] has encouraged us to send any questions we can not answer to him. He has taught classes to new depository librarians, and refreshed depository policies with librarians who have been in the documents business for a while. We appreciate the communications with [the regional librarian] and his staff.

Library's relationship with the Regional Depository: The [regional library] has always been a service oriented organization focusing on the needs of the State and the libraries therein. Our depository has a good relationship with [the regional librarian] and we appreciate the work she does on behalf of the document community. Budget constraints at the state level have impacted on the public service hours of the facility and, to some degree, the availability of its staff.

How has it changed in recent years: The ..., where documents are housed for the [selective library], was until recently under the auspices of the [regional library] as our "regional". The fact that we no longer have two regionals in [state] is unfortunate. Both [regional librarians] worked well together and provided a safety net, so to speak, so that when help was needed it was possible to get one of the two librarians in a short amount of time. As a valuable state resource, it is regrettable that [former regional library] would lose such important resources. With [the regional librarian] gone, [the remaining regional librarian] oversees all the depository libraries in [state], which is a bigger workload. Despite this, and the cutbacks at the state level, the documents department has worked hard to keep lines of communication open and to maintain support to selective depositories.

Seek regional designation for your library: We would not seek regional designation for the following reasons: 1. Space considerations 2. Our location in the very southeast corner of the state is not easily accessible to the rest of the state 2. We do not plan to allocate additional financial resources for what is a broader state-wide function.

[The regional librarian] has been extraordinarily helpful and supportive. He is proactive, offers thoughtful guidance, promptly reviews disposal lists, and provides excellent reference assistance.

I am very concerned about the staffing cuts faced by the [regional library]. Our regional had enormous responsibilities even before the cutbacks, and now it will be even more difficult for our regional to stay on top of everything without working large amounts of unpaid overtime.

I am new to depository work, and I appreciate the expertise and support that our regional's staff has given. Their letter to the GPO shows they have given careful consideration to its depositories' current and future needs and is working to structure its operations to continue to provide a high level of service.

I know there were staff changes and reorganizations in our regional depository several years ago which affected the attention given to map resources. I also know that regional depository staff are very busy and pressed for time. However, I have no true sense of what they actually face in terms of storage space, funding, and participation in archiving digital information. Our library would not be a good candidate for a second regional depository in our state, but could establishing second regionals or subregionals within the state be an effective solution? Could we establish within our existing network criteria in which selective depositories were used to store certain materials, assisting with space concerns and ensuring statewide access to a variety of

collections? As digitization becomes more common and archival concerns for those materials remain important, could regionals take the lead there and share the burden for storage of other materials with the selectives? Just some thoughts.

I have heard rumors that this report will advocate doing away with the regional system. I hope that is not the case. If anything, I think the regionals are needed now more than ever. (Even with the Public Access Assessments, it will not be possible for GPO to "know" each selective the way the regionals can). It may be that there needs to be *more* regionals so that each one will not be so overwhelmed. The place for GPO to engage in this process is to help regionals maintain the support of their respective administrations. (What can GPO offer the institution that would make it profitable for them to maintain regional status?) I also think there needs to be accountability so that the regionals know that someone at GPO knows what they are doing. (Perhaps they could be given a different Biennial Survey where they could report on number of site visits or other contacts made, number of training sessions offered, etc.)

I have been generally satisfied with my regional which is Most of all, I appreciate the fact that the librarian there is visible. He attends and participates in both our state association and a group we have for doc librarians in the local area. I know that management of disposal lists has been a big challenge for them, partially due to inadequate staffing. But even so, the lists do get done eventually so I don't see that as a major issue.

I do think the strength of the depository program lies in its collaborative nature. There are numerous individuals who are committed to it and they form a strong network. I think the regionals have been a strong link in the process and I hope that will continue into the future.

Our regional director is doing a wonderful job. She's very supportive and understanding regarding the needs of our library. As an example, the ... is in the process of restructuring its departments, with talks of canceling our depository status. When I explained this to [the regional librarian], she immediately offered some suggestions and her support to keep this from happening. We've really appreciated her help in this matter, especially since we've kept our status.

Our only complaints have been in the area of response time. We've had and still have several discard lists awaiting approval that are dated several months back and into last year. I have expressed our concern in this matter and [he regional librarian] has explained her situation. Improvements have been made, but it still an ongoing issue that we're hoping will be resolved soon. Other than this, we have no other complaints and enjoy working with [the regional librarian].

I have been in my position as selective coordinator for less than one year. Because I am a new coordinator at a somewhat older selective, I reviewed the FDL Handbook Chapter 12: Regional Services (<http://www.fdlp.gov/repository/individual-sections-of-the-handbook/chapter-12-regional-services/download.html>) as a basis for my comments.

[State] has 2 regional libraries. Although ... is my designated regional, the ... Library has the benefit of receiving assistance and service from both. I am outlining my comments based on some of the headings/designations the FDL Handbook outlines as services and responsibilities of the Regional libraries.

Interlibrary Loan & Reference Services

Both regionals have come to my rescue with answers to reference questions as well as materials for our local customers. I have emailed and phoned both collections and have received immediate reference assistance, materials, advisement, or whatever the case may be. Not only have the regional directors been helpful, but the staff at each location is incredibly knowledgeable and helpful as well. The staff in each location is well aware of the learning curve I am still experience as a new depository librarian and each has been incredibly patient and helpful in assisting me with any manner of question.

Collaborative efforts

I'm unaware of an official State Plan, though I'm sure that if is not formal and official, [the 2 regionals] work within the elements of a state plan. [They] communicate often about the services each can offer to the selectives throughout the state. I have even heard talk of what each would do in the event of the other's retirement, in hopes of not disrupting assistance and service to their customers and their selectives.

Disposal Process

I have not yet gone through the disposal process. What is currently weeded from the ... collection is superceded or older than 5 years. As a new depository librarian, I feel I would benefit from greater council and advisement with regard to disposals. I would also like to note that my lack of advisement is not the deficiency of either of the regionals, but still my lack of knowledge to ask the right question, but I am getting there.

Regional Coordinator Responsibilities, including legal requirements

The FDL Handbook notes that a regional coordinator is responsible for the continued education of depository coordinators throughout the state. This is an area that [the regional librarian] and his staff at [the regional] excel in. Although [the regional librarian] and his staff at [the other regional] offer occasional learning opportunities [The regional librarian] every year provides a listing of workshops and learning opportunities that he will offer at libraries throughout the state, regardless of depository status. [The regional librarian]'s tagline is "Have car, will travel." Not only does the [regional] staff take workshops on the road, they include the depository coordinators in the training opportunities whenever possible, providing no shortage of continuing education throughout the region.

Both [regional librarians] work to ensure the integrity of the region the serve. Each serves as a leader in the depository community, one more on a national level, the other more on a local level. Each knows his collection or knows that his staff can be trusted to know the collection. And each is available and accessible to assist, serving as a mentor and educator as well as a regional coordinator.

I would like to say in closing, that I have received nothing but assistance, encouragement and support from the regional coordinators in my state. As a new depository coordinator this has been invaluable. I hope these comments are found to be helpful, or if nothing else, find their way to my regionals as illustration of all that they do to insure access and dissemination of government information.

My comments relate to the support we receive from our Regional Library, the [...]. In the years I have been government documents librarian at Hennepin County Library, I have always felt the Regional Library has been very responsive and helpful. We have bimonthly meetings of documents librarians from around the state. The Regional Library maintains a home page for documents librarians. They are available for reference assistance and promptly answer any questions I have sent them. They process our discard lists in a timely manner. Our regional also offers an annual continuing education Spring Forum on various topics of interest to government publications librarians. Their support has remained steady though I know they have experienced significant staff reductions recently.

State Libraries

The Regional Depository Library for [state's] selective libraries is the [regional library] has had a long-standing, positive relationship with the staff of the [regional library] where the regional collection is housed. They provide an excellent level of support in many areas: assistance with weeding our collections; providing federal documents through Inter-Library Loan; and providing answers to the numerous questions that can come up when managing a selective depository collection. They also provide additional support by keeping the lines of communication open through the [state] DOCS listserv, and by offering training and collaboration through the annual Spring Forum, which is a joint meeting with [state] and [state] depository librarians. We depend on them to help us provide quality service to the citizens of this state.

The [regional library] provides a very useful level of support to our selective depository. Our regional allows us to provide our users access to federal documents we may not own; a very important resource for both our government and public library users

We are a selective depository that currently selects items at around 28%. Here is how we will be impacted if we no longer have a regional library in [state].

1. [Regional library] would no longer be required to maintain a comprehensive collection of federal government publications, so we would have to use libraries on the ... to obtain materials not available in our region. Using ILL is slow and dependent on the mail system. Information turnaround would increase by days, if not weeks.
2. We would have to send our withdrawal lists to a library on the Mainland. If they requested

items from our list, we would have to ship the items to them at our expense. We have no way of requesting for reimbursement of postage expense. This factor has limited our ability to offer all our withdrawal items to the Needs & Offers list.

3. We would have to contact a library on the Mainland to ask questions about depository management and to get help with reference questions. Librarians on the Mainland would probably be less familiar with [local area] resources and publications. Also the time zone differences will limit our contact time.

4. We do not have the space or the resources to be the replacement regional depository library in [state]. It is unlikely that another library in [state] would be interested in being designated a regional.

5. When [regional library] got hit with a pre-Halloween flood in 2004, our collection became the defacto regional library. We had collected and weeded our depository library resources assuming the [regional library] would have the back-up collection. There were many resources not available to us. I personally had to deliver the news that a certain reference source was not available in [state] and we had to go ILL for their request. We charge \$10 for doing an ILL and add-on any expenses. The patrons usually could not afford the expense and had to find their information another way or had to redefine their study areas.

6. Our library is the main branch of the ... State Public Library System. Our Internet connection is filtered by CIPA required filters and we have restricted access to the Internet by placing various firewalls for our protection. These firewalls prevent us from cataloging electronic depository library titles because of the potential and real Internet abuse. Therefore, we have difficulty in browsing suitable documents for any information requests within our OPAC and rely on outside resources for subject headings, etc.

The ... is a Selective library collecting at 30%. One of the most valuable services that our Regional provides for us and the other Selectives in [state] is the coordination of our Needs and Offers within the state. In addition to providing us with the usual permissions and guidance in discarding documents that have met their retention schedule, our Regional serves as a central reporting point. They maintain our state documents listserv and coordinate the posting of our Needs and Offers lists to the listserv for the benefit of all of the Selective depositories in the state.

Our Selective is a special library which serves state agency personnel, historians, and the general public. We maintain an historical collection in the areas of government, environment, elections, census, etc. While there are some indexes, publication lists and other finding aids to help patrons locate materials, the Federal Documents collection is not used to its full potential because standard cataloging is not available for the older documents (pre-1976) to be added to our online public access catalog. It would provide a great service to us and the other Selectives in [state] if our Regional library (working in cooperation with other Regionals) could systematically provide cataloging for some if not all of the pre-1976 documents. Of course, there is a large time,

personnel, and money investment to be considered, however the service to the Selectives would be invaluable.

Regional Depository Libraries

Academic Libraries

During the recent Depository Library Council Meeting, the Government Printing Office asked regional librarians to provide a report detailing the current and future conditions of their regional depository. For the past year, the [regional library] has been looking at this exact issue, first by bringing in library process-improvement consultants to make recommendations, then by creating the Government Documents Implementation Group to discuss and potentially implement the consultant's recommendations. The Implementation Group is divided into three subgroups with each looking at specific recommendations. These subgroups are Positioning for the Future, Collections (including management of international, federal, and state documents collections), and Processing (including processing and cataloging of all types of documents). These subgroups began meeting in March, 2008 and will continue through at least December, 2008.

In general the consultants' report makes it obvious that the ... Regional Depository cannot sustain current practices and so the University Libraries are looking for a new model that continues to provide a high level of library service but that incorporates new technologies and new ways of working with government information. The consultants highlighted several areas where changes could be made. The Implementation Group is discussing these changes and expanding on them to include other areas of potential change. Although the Implementation Group is in its initial stages, several critical issues can be described, both from the current situation and from the potential plans the University Libraries could take in the near future.

Ultimately the future of a regional depository library at the [regional library] rests in making changes to Title 44 to allow more flexibility in how the regionals can carry out their missions within the Federal Depository Library Program. A sustainable infrastructure for government information access, through the depository program, will depend on a fundamentally different paradigm for coordinating the access, management, and preservation of government resources.

ISSUE #1: Collections management (space, access, preservation)

Current Situation

Space is a huge problem for the ...Regional Depository Library. The regional collection is split between Wilson Library (at over 90% capacity) and the ... Library Access Center (a cooperative storage facility for libraries in the state, based at the [regional library], at 100% capacity). In addition to the Regional Library on the [city] campus, the University of ..., houses a selective federal depository. The need for and implications of having two depositories on the ... campus is part of the space discussion as well.

In addition to space issues, basic bibliographic access capability is critical, especially for documents published before 1976. Post-1976 documents are part of the library's online catalog. However, the only way to find out what the Libraries own for documents older than 1976 is

through the paper shelflist found in ... Library, and then only if the call number for the needed document is known. The [regional library] is not alone in this situation. The availability of foundational bibliographic records in machine readable form for pre-1976 documents is a key component of infrastructure for government documents. The return on investment in collections from government and depository library resources is seriously hampered by lack of robust access.

Preservation is also a key piece of collection management. The [regional library] documents collection is estimated at 3 million documents, the majority of these items published in the last 125 years. There are preservation issues that can be readily identified which focus on the tangible collection: older documents printed on acid paper, general wear and tear of decades of use, lack of archival-level temperature and humidity controls, degrading microfiche formats. However, there are also the issues of electronic (online) document preservation and issues related to digital preservation standards and formats. As new technologies are created and used, regional depositories' legal ability to preserve a copy of all government "documents" is expanded to a new level. Present regulatory practices do not anticipate the size of physical collections and do not scale; preservation of electronic documents is not even addressed.

Potential Future

Future scenarios include eliminating the selective depository on campus; creating selective housing agreements; developing shared regionals; and digitizing the entire collection (stored on institutional servers) and thereby eliminating most of the tangible documents collection. As can be seen from this above list, the potential for collaboration with other institutions is very high and may be the only way some of these projects will move forward. For many years, the University Libraries has looked to the Government Printing Office to provide these partnership opportunities; however, for a variety of reasons, GPO has not been able to fund these initiatives.

The [regional library] is moving forward, looking for partnerships with such institutions as selective depositories in the state, libraries within the ... campus, or larger library networks such as ..., a state-funded library resource sharing agency which is a division of the University of ... Libraries. [State-funded library resource sharing agency] serves academic and government libraries, and contracts with public libraries in [state] and [state] and [state]. Another potential partner is the Committee on Institutional Cooperation (CIC refers to the "Big 10" schools plus University of Chicago). Partnerships with other regionals also will be considered.

The impetus for the Government Printing Office's report to the Joint Committee on Printing is the concept of shared regionals. Many regional libraries face the same issues and share the same concerns outlined here for the [regional library]. All share the same mission to provide the best possible service to the selectives in their region, and to the public at large. The information paradigm for all libraries has shifted to more digital and more cooperative resources and services. The regional depositories need the ability to pursue the same collaborative approach, at the same level, as their institutional libraries are pursuing.

ISSUE #2: Staffing

Current Situation

Since 2000, the ... Regional Library has lost two librarian positions, including one in 2007. For those staff positions left, recent outside factors have affected the workloads. In the past year two selective depositories have dropped status and another five have aggressively weeded their collections. The additional work for processing this huge number of discard lists (several of these depositories have collections going back 50-75 years) has meant putting off other work that would have helped meet the goals of the University Libraries government information services. This trend will continue to put added burden on the regional staff.

Another key issue for staff is the shift in focus that comes with a change from a tangible documents collection to a predominantly electronic one. This change is not only in the amount of government information available through federal sites but also in the growth of proprietary government information databases that staff must be knowledgeable in using. In addition, the selectives as well as non-depository libraries in [state] and [state] are looking to the Regional Library to provide training and reference support. Within the University Libraries as well, staff look to the Regional to provide government information expertise for both reference and technical services. With more than 90% of current federal publications being issued electronically, it becomes increasingly necessary to build a coherent, federated online environment for digital resources. No single institution will be able to complete this task independently.

Potential Future

The number of staff for the Regional Library will not increase in the near future; therefore, the University Libraries must look at ways to discontinue some practices and grow in others. The current Title 44 leaves little flexibility with what the regionals can do with regards to a tangible collection. While the need for withdrawal lists to ensure a complete regional collection has merit in providing access to all government information, the specificity in format limits what regionals can do to provide the best access. Because of the situation of having a regional and selective on the ... campus, the potential of relinquishing the selective status to provide more staffing for other initiatives is also being considered.

The University of ... Libraries recently drafted goals for FY2009 and FY2010. Included in these are integrating “information discovery and management tools and services into the workflow of students and faculty”; advancing “the Libraries’ transition from print to digital collections, fostering cooperative action toward a new model of collection management and increasing the visibility of and access to our rich array of resources”; and investing “in staff and organizational capacity for innovation, collaboration and risk taking”. For the University Libraries to accomplish these goals for the Regional Depository, changes will need to be made to where staff spends their time.

ISSUE #3: Technology

Current Situation

The ... Regional Library relies heavily on its website to provide access to government information that is available electronically. The Libraries’ online catalog also provides access to electronic resources as well as access to tangible documents collections published from 1976 to present. The Government Printing Office is working on such systems as FDSys to provide a new more federated online environment for born-digital resources. The high potential for loss of

information makes this a priority. However, as mentioned under the earlier issues, the current needs of the Regional Library are dealing with the collections we already have and how to improve access to them.

Potential Future

A major goal of the University Libraries is to transition from print to digital collections and to invest in our “capacity for innovation, collaboration and risk taking”. The technology development capacity here at the University of ... Libraries provides an opportunity to reconceive the Regional Depository collection and service program, an opportunity the Government Document Implementation Group is not going to ignore. The group will be developing plans on how technology will be part of the Depository’s future including digitization of the collection. Note that the University Libraries are part of the Committee on Institutional Cooperation partnership with Google to digitize as many as 10 million volumes from our collective collections. While government documents are included in that program, questions remain about the accessibility of these documents through a commercial service, particularly in the interpretation of what is in the public domain. Academic libraries, as non-profit educational institutions, offer a venue for greater access to digitized government publications and more limited legal risk with respect to copyright interpretation.

UNDERLYING ISSUE: Funding Models

As with most public research institutions, the percentage of funding from the state is on a decline. Similarly, funding for the University of ... Libraries has not kept pace with inflation in publishing nor with demand for services. Resources we already receive must be allocated in different, more efficient ways. The current Regional Depository System is based on a tangible documents collection, housed in a building. The future of the University of ... Libraries (and its funding) is based on greater efficiencies and advanced technologies, providing increased access to information electronically and integrating this access into our patron’s workflow at their point of need. These paths need to come together for the Regional Depository at the University of ... in order to sustain effective services that reflect efficient stewardship of government resources.

A logical strategy for aligning resources and services in a manner that is effective and efficient can only be developed through changes to Title 44. The Title 44, Section 1912 changes being highlighted by the Government Printing Office’s Current State of Regional Libraries Report is a good place to start. The expansion of the permitted formats for providing permanent, perpetual access need to include electronic media at the least, or be non-format specific to allow regionals to provide access in the best way they can. The regulatory environment for managing regional collections needs to be more flexible and the exploitation of technology more robust in order for libraries such as the [institution] to sustain its Regional Library services.

GPO needs to move more aggressively to digitally archiving federal documents so that access is centralized, especially for high-use publications.

2. Regional depositories should move towards sharing collections and even service responsibilities with other regional and even selective depositories both intra- and inter-state.

3. Interlibrary lending of documents among regional depositories should be encouraged so that not all collections need to maintain holdings of all tangible documents.
 4. The regional depository lost 95+% of its holdings in an October 2004 flood. The Library will not be able to replace all that was lost nor will it be able to process all replacement documents already received as gifts.
 5. Like other university libraries, [regional library] must place increasing emphasis on allocating resources for space, processing, and services to locally significant heritage collections and heavily used materials. At the same time we are repurposing library space for users rather than storage of collections. We cannot afford space for the large number of tangible documents that are not used.
 6. Library resources available to allocate to federal government documents may not be sufficient to maintain a regional depository in the future.
 7. Allow regional depositories to discard items not relevant to their local clientele, e.g. documents specific to other states with no informational value to a broader audience.
 8. GPO needs statutory authority to give grants to regional depositories to do training and site visits to their selective depositories.
 9. Resource sharing is the modern approach to library collections. A new system of several full depository service centers in each region (North, South, East, West) should be sufficient if funding is provided to those service centers to provide services to their neighboring states and territories. Existing regional depositories could then elect to become selective depositories with the materials they know their local clientele need the most.
-

Draft outline looks good.

Question #1 - would it be possible to use some questions from the 2003 Regional Depository Library Survey done by Kessler, Rowe and Sudduth - using similar questions would allow for trend and comparison data that would better support any narrative.

Section V, b and Appendix - will this include the proposals or summaries of proposals to create consultants in the regionals and what their purpose was and how this was to assist Regionals in functions they were unable to accomplish?

Section V, b and Appendix - will this include the proposals to allow GPO to granting authority to assist some libraries with programs and projects - I believe this was proposed in FY 2005 or 2006?

Section IV, d looks like it will probably be a compilation of narrative statements from the regionals that will need to be summarized.

Each region should be evaluated separately. What effects one region does not necessarily affect another.

-As a librarian formerly at a regional depository library, I see less demand for traditional library services amongst FDL's and more demand for training in the region. Yet there is still a need for future generations to perform those traditional library services like housing print materials and cataloging them. As selective libraries pursue their users' interests and needs, the responsibility for regional libraries to maintain their print collections is and will continue to increase.

-It is ironic that the electronic era has made it easier to facilitate access to print resources through ILL systems, online cataloging, etc. These new electronic resources are not bound by traditional geographic divisions like state lines.

-Libraries in general are in transition. It used to be that there were small "technology" offices located in libraries. Now web designers, database managers, digital content teams, and more are all a part of the general library structure. Consortia are at an all time high in libraries because resources are limited, but pooling resources has benefits for all. Depository libraries can benefit from the sharing of tangible resources, provided that the appropriate framework for the sharing of resources is installed.

It is also ironic that there is a greater concern about electronic resources, meaning the preservation of electronic information, the migration of electronic resources to new platforms, and how libraries can serve their users in the future. The maintenance of a shared print collection is at a far less risk of disappearing, in need of reformatting, or in need of expertise to utilize. All depository libraries share the responsibility of housing print resources, some having more space than others. Particularly in the regions in need of more space, a shared housing arrangement across state lines should alleviate the space shortage. A shared housing arrangement with a support system in place is better than loosing one library to the detriment of that entire region.

-Every library is in a different financial situation. One library may allocate funds equitably amongst print/electronic or monographic/serial fund lines, while others will skew their funding towards one or the other. Each library is gambling with their library users' future needs, as well as their expected budgetary situation. In this era budgets are not reliable and many libraries are "betting" that it is safer to cut the more expensive, repeating or serial fund lines; leaving the static or monographic "one time purchases" at a flat allotment. For some depository libraries it may seem economical to cooperatively develop their collections with their nearby depository libraries, regardless of state lines. This is particularly important in large states that have few depository libraries and travel distances are great.

-We are already a "virtual" depository library whether we like it or not. It's not the incoming tangible materials that are hurting us (there are so few), instead it is the maintenance of the old collection as it deteriorates that is difficult but important.

One other difficulty virtual depository libraries are facing is the difficulty in gathering electronic-document usage statistics. Libraries in general are struggling with how to track usage statistics of

online and database resources. It has become particularly difficult for depository librarians to prove “virtual” depository library usage, despite its actual usage.

-A depository library is only as good as its staffing. Budgets are tight all over and as people retire or move on, positions are not necessarily being filled. This makes it more important for depository libraries to train each other so we can maintain a high level of service for our users. It is particularly critical at regional libraries who traditionally share the most responsibility for training.

The [regional library] welcomes the opportunity to respond to GPO and the Joint Committee on Printing. Let me say at the outset that my library has a very strong commitment to access to government information. A convergence of competing needs, however, places some strains on my library’s ability to provide the level of regional services to which selective libraries and all of our users are entitled. In addition to completing the survey of regional libraries, I offer the following additional comments on questions asked, or in some cases not asked, in the survey.

In order to continue to serve as a regional library, I believe that Title 44 should be amended to provide increased flexibility to regional libraries that would enable them to strategically develop their collections with the specific goal of tailoring resources and services to meet state-wide and regional needs. Key to this endeavor is a revision to Title 44 that would permit and encourage intrastate and interstate cooperation and sharing of responsibilities. With the improved delivery mechanisms available, every state may not need a regional. In recent years there have been a number of suggestions about creating “super” regionals serving multiple states or subject-based regionals. With adequate fiscal support from GPO my library would consider becoming a “super” regional for my geographic region (question 9). Fiscal support is critical. Because of the pressures on the library’s budget (question 18), my library feels constrained in its ability to provide collections and services that support its long-term vision of the future. Furthermore, because of the need to tailor collections, the law should be amended to allow collection of tangible products at less than a 100% level. For example, a regional serving the interior of the western United States, might not need to collect all of the materials relating to coastal issues. Increased flexibility in the mandate to acquire and maintain 100% collections would also enable my library to adopt a needs-driven approach to withdrawal of materials by selective libraries, thus reducing the burden imposed by this labor-intensive process.

Why would the [regional library] be willing to assume additional responsibilities if it were to receive adequate support from GPO? Its collections and services are frequently used by citizens of [state] and play a vital role in meeting user needs at our research intensive institution (question 10). The Governor of [state] frequently cites the library’s depository and research collections when discussing the needs of the state. Furthermore, feedback from selectives indicates that, although highly satisfied with the services provided by [the university], they require increased support in a variety of areas including training and consultation. A poor economic outlook for the state (question 20) means that my library will be increasingly constrained in its abilities to meet these demands. Again, fiscal support is needed to provide services at optimal levels. Becoming a “super” regional would place demands on my institution that could not be met without monetary support for people, travel, and infrastructure. By “infrastructure” I refer to

support for both the physical space to house the collections and the intellectual “space” required to facilitate access. In order to facilitate access to the collections, all libraries need cataloging records linked to digital copies for the legacy collection that are adequate to support research needs. While GPO is to be commended for its initiative to create minimal level catalog records based on its shelf list, these minimal level records may not support serious research needs. Because cataloging of sufficient quality to meet research needs may not be possible without the piece in hand, GPO should partner with regional libraries to enhance these records for the benefit of all—another activity that requires financial support. I am also concerned that GPO’s Z39.50 gateway to its catalog is not sufficiently robust to allow downloading of records at the level required to support the large collections of regional libraries.

Budgetary constraints at my library will cause a decline in regional services to selective depositories in my region (question 23). Electronic access has made it possible for a larger and more diverse set of libraries to provide government information to users. The University of ... has been a leader in providing training on the use of electronic government information through its IMLS-funded *Government Information for the 21st Century* grant initiative. Based on our experience with this grant, we believe that a national program, administered by selected regional libraries, offers the greatest potential to offer much needed training to all types of libraries and their users in a nimble and expeditious manner. Unfortunately, when the grant ends in September of 2008, this library will no longer be in a position to provide the level outreach and instruction demanded by our users without an additional infusion of monetary resources. Thus, services will decline without a source of continuing support.

Because ability to meet user needs is dependent on access to collections and direct experience with meeting user needs, I do not believe the availability of locally-placed GPO consultants would add to our abilities to provide depository library services (question 21). Although GPO has gained valuable experience with its provision of information in electronic format, its historical mission and attendant strength has been the distribution of materials. The expertise in using these materials resides in depository libraries with collections at their disposal and direct experience in meeting user needs.

Due to the current constraints of Title 44 the skill sets needed by documents staff are concentrated in the area of processing. Processing and handling electronic resources requires a distinctly different set of skills. While it seems logical to ask regional libraries to assume additional responsibilities for the digitization, storage and long term preservation of electronic materials, the current requirements for maintenance of the tangible collection severely impairs the library’s ability to transition to a more electronic collection.

One area of potential concern that was not addressed by the survey or by any of the responses shared among directors of ARL libraries is the additional demands that the open access movement may place on depository libraries. If, as is widely anticipated, agencies such as DOE and EPA mandate deposit of funded research in open access repositories similar to NIH’s *PubMedCentral*, this may create additional demands for government publications librarians to provide support for these initiatives.

I echo concerns raised by Judy Russell and other ARL library directors. In order for the regional libraries to survive and thrive, changes to Title 44 are both desirable and necessary. In summary, I encourage GPO to suggest changes that:

- Allow for increased interstate cooperation;
- Allow for the creation of “super” regionals or subject-based regional collections;
- Provide greater flexibility in the strategic development of collections and services;
- Provide for monetary support for regional operations;
- Mandate that GPO to coordinate the creation and distribution of high-quality cataloging records for the legacy collection that are linked to a comprehensive digital repository of materials in the legacy collection;
- Provide incentives and support for regional libraries to continue to provide innovative services.

My comments are based on discussions with depository librarians at [the university] and on a letter submitted to me by a group of depository coordinators from libraries in the [state] Alliance of Research Libraries (attached).

Attached letter

We, as members of the selective federal depository community of [state], believe that it is the responsibility of all depository libraries in the state of ... to ensure, to the best of their abilities, that [state] citizens continue to have access to US government information now and in the future. A strong Regional Depository Library (RDL) is crucial to this task. The RDL at the University of... is one of the strongest RDLs in the nation, providing excellent support for selective depository librarians on an ongoing basis as well as through special initiatives such as the IMLS grant "Government Information for the 21st Century." The selective depository community of [state] desires that these strengths continue.

The Report to the Congressional Joint Committee on Printing on the current state of regional depository libraries, due in June 2008, provides an opportunity for assessment of RDI, activities and selective depository librarians encourage a thoughtful discussion of the responses to the report. A positive outcome can only benefit the future mission of Colorado depository libraries and the Federal Depository Library Program as a whole. Among the services provided by the RDL to the selectives, several deserve highlighting: Community of Experts: In many ways the RDL serves as the local voice of the Government Printing Office (GPO), providing interpretations, explanations, and updates of policies and regulations. Under the RDL's leadership, the Government Publications Interest Group (GoPIG) presents opportunities for depository librarians and staff to exchange ideas, share best practices and knowledge about collection strengths and areas of expertise. Training: For many years the RDL has coordinated training on important resources and issues through forums such as the monthly GoPIG meetings. The COGOPUB-L listserv and the above mentioned "Government Information for the 21st Century" grant, which extends training opportunities to non-documents librarians. Selective depository librarians have been encouraged.

I'm going to start with my Title 44 suggestions since I suspect new language would be required to support existing multi-state Regionals as well as my new vision for Regionals.

I would suggest for chap. 1911:

Remove "in either printed form or microfacsimile form" from second sentence following the word "permanently" and substitute "in at least one format."

I would suggest for chap. 1912:

Remove "either in printed or microfacsimile form" from VERY long second sentence right before parenthetical statement about superseded material and substitute "in at least one format."

Add at the end of the first paragraph in chap. 1912 the following sentence (or create a new paragraph?):

"If no regional depository is designated in a state, the Senator or the Resident Commissioner from Puerto Rico within that state or territory may seek to have a regional in a neighboring state or territory designated as the regional for their state or territory with the concurrence of the Senator or the Resident Commissioner of the neighboring state or territory and the state library agencies in both states."

This might have to be followed by another sentence or two reiterating some of the language in the preceding sentences or paragraph.

Now for my new vision:

Since storage space for, maintenance of, and access to the legacy collections, and the possible need to archive electronic publications, appear to me to be the primary stressors on existing Regionals, my thinking about this has been primarily focused on these two issues.

I see a new layer of 10-15 Regionals in a geographically dispersed pattern (determined by GPO) to agree to be the "light archive" and disposal approving agency for several surrounding states. These institutions would also agree to archive some portion of the electronic publications GPO is archiving so that together they equal at least one complete, separate mirror site--would be nice if we could end up with two nationwide, not just one. Think LOCKSS without quite the amount of redundancy (I think they require 6 copies). I am VERY committed to some level of redundant archiving of these electronic resources in non-federal government institutions to guard against catastrophe or political manipulation.

Institutions would compete for appointment to do this, so some powerful incentives will have to be put in place by GPO (see 2d & 3d paragraphs below) in order to attract volunteer libraries.

The existing layer of Regionals would continue to be the primary service and training resource for the Selectives in their states if they choose to retain designation as the lead depository in their state (thinking this could be handled as a GPO administrative designation covered by language in 1914?). Such a designation would continue to entitle them to receive all pubs. if they so desire, and any "Regional only" distribution of tangible material, e.g., bound Serial Set. However, they would now be allowed to submit lists of unwanted materials for disposal to the Regional for their group of states per instructions in Title 44, chaps. 1911 and 1912.

Since the depository information products, regardless of format, are no longer a sufficient incentive to libraries to continue their role as Regionals, GPO needs to think out of the box regarding what other benefits they can offer to libraries who agree to do more than Selectives. The most attractive scenario for libraries would be one where GPO treats these libraries as "contractors" for housing and managing their "national collection" in a distributed fashion across the U.S. This would allow the libraries to recover the costs of building and managing storage facilities for all formats.

However, assuming that GPO cannot use funding to entice libraries to volunteer to serve in this role, the agency would need to move aggressively to create a robust benefit for those institutions who agree to take on this task. For example, cataloging (records and OCLC holdings, current and retro), processing (smart barcodes?). storage (servers), regional consultant (staffing), on-demand replacement of fiche/paper at no cost, etc. I'm thinking GPO could treat these services, supplies, equipment, regionally-based staff, etc., as just a different sort of deliverable to libraries, similar to the actual tangible publications. This benefit would have to be available only to those institutions who are willing to take on the role of a "light archive" (code word for "Super-Regional" IMHO).

I have no idea how realistic any of this is, or whether it would require additional Title 44 changes, but I do know that without some major incentives to Regionals, the current Regionals system will die sooner than later.

These are entirely my own opinions, and do not necessarily reflect the thinking of anyone at my institution.

I have been monitoring this situation, and I am astonished by the hostility of some of the parties involved. A number of constituencies have apparently been harboring negative feelings for a long time, and are using this opportunity to blast their colleagues. Even GPO has been guilty of setting an extremely negative tone. A prime example is the subtitle of the GPO Draft, "study to determine the extent to which public access through the federal depository library program is impaired by current and projected conditions in regional depository libraries." Why even have a study? Apparently you already know that public access is impaired. Wouldn't it be more accurate (and more positive) to determine "the impact of current and projected conditions in Regional Depository Libraries on public access."

I'm a realist, not a Pollyanna, so I know that there are problems. But I can't help thinking that we are often our own worst enemy by not taking a more positive pro-active approach.

The regional depository at the University of ...is committed to servicing our primary clientele at the University, the selective depositories in the region, and the larger community. After the destructive flood of October 2004 where 95% of the federal documents collection was destroyed, we are making every effort to replace as much of the previous holdings to the extent possible (within the limitations of funding and staffing).

... University Library is a member of ASERL, and a full supporter of the letter sent forward by them on May 13, 2008 in response to your request for information. It is our perception that the regional depository system is overloaded and the task they are given is virtually impossible, and we encourage action on the suggestions made in the ASERL letter. It is too difficult for a regional to weed its collections, even with the Superintendent of Documents' recommendation that it do so, because of the long delays in getting permission to send materials elsewhere or discard them. I know that this is not just a problem in [state].

Public Users

The FDLP is a good program. However there are not enough depository libraries. We in ... County have to drive (at \$4.00 a gallon) to access Government DL material.

As a U.S. citizen, I appreciate and use the Federal depository library system resources. The proposed consolidation of Kansas and Nebraska depository libraries is unacceptable. Any reduction of Federal support to depository libraries is unacceptable and is discouraged. The system should maintain depository libraries in each state. Many citizens have no internet and need the physical library for personal and professional research by businesspeople, students, researchers, and others. I advocate increased funding and support to these depository libraries.

Existing pressures as outlined in the Regional Depository Librarians' Joint Perspective must be eased while maintaining permanent public access to and services for U.S. Government information resources.

With continuous changes in library collections, a concerted effort to develop a national bibliography of U.S. Government publications is very important to maintain access to the resources. With enhanced identification of resources, the options for the U.S. Government information user to gain access to needed information in a timely manner are more readily identified.

Any changes to the law governing the FDLP must keep in mind that regional depository libraries are currently extremely varied, as outlined in Background: Table 1. Existing Regional Depository Library Models. They are managed within autonomous institutions and serve different numbers of selective libraries, all of which represent different sizes and types of

libraries in the FDLP. This has led to varying levels of service for the general public and for the selective depository libraries at the different regional depositories. Any changes in the FDLP should continue to allow flexibility in how the autonomous Federal depository libraries provide service while also maintaining standards of service that guarantee U.S. Government information researchers free public access to U.S. Government information resources.

Thank you very much for the opportunity to comment.

DRAFT

Regional Depository Libraries in the 21st Century:

Regional Depository Librarians' Perspective

Introduction

In the wake of the Joint Committee on Printing (JCP) request for a study on regional depository libraries, the regional depository community would like to take this opportunity to articulate the work that regional depository libraries and librarians do. With this joint statement, regional depository librarians are attempting to describe factors affecting service, the various resource demands on our institutions, and the ways in which we evolve to meet the needs of the public. Most importantly, regional depositories are advocates for robust government information services in a state or region.

The following sections describe some of the general trends and issues that regional depository libraries currently face. While each issue is not necessarily experienced by all regional depositories, each one factors into a large number of regional depositories' environments. Although this document is intended to be a "sense of the regional depositories" statement, it does not necessarily reflect the views of any single regional depository librarian or their administration. However, as a group regional depository librarians believe that the information environment is constantly changing, and regional depositories must have the flexibility to develop services to meet new challenges and to provide expert help to selective depositories and the general public in finding and using government information.

Collections

With the passage of the Depository Library Act of 1962 (PL 87-579) the landscape of the Federal Depository Library Program (FDLP), managed by the U. S. Government Printing Office (GPO), was dramatically changed. The creation of a two-tiered depository system significantly affected the FDLP in two major areas: 1) the creation of regional depository libraries which accepted the responsibility of retaining all depository publications; 2) allowing newly created "selective depositories" to discard government publications with the permission of the regional depository library. Further, regional depository libraries "within the region served will provide interlibrary loan, reference service, and assistance for depository libraries in the disposal of unwanted Government publications." (44USC1912) Over the years, many regional depositories have expanded their services to selective depositories and the public to include training, site visits, in-depth consultation, and other services.

Ironically, the same space pressures felt by the 594 depositories which, in 1962, could not discard any "unwanted Government publications" are now forcing the FDLP to realistically evaluate how many "complete" depository collections are necessary. Importantly, Congress recognized the need to ensure access to government information by creating regional depositories which were charged with retaining all depository materials. At that time slow delivery methods, no scanning or digital delivery technology, poor interlibrary loan turn-around times, lack of bibliographic control for federal materials and similar issues argued for the presence of a full regional depository in every

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state. However, this goal was never achieved. There are currently eight regional depository libraries serving more than one state/territory.

Nevertheless, to ensure that every U.S. citizen had easy, convenient access to government information in 1962 meant that Congress set a goal to establish at least one regional "complete" collection in each state. In 2008 this same level of easy, convenient access can be guaranteed by fewer "complete" collections and smarter collaborations and delivery systems. Now, the ubiquity of federal information on the Internet, much better bibliographic control of federal publications, and improved delivery methods, both physical and digital, make it possible to deliver federal information to U.S. citizens in all parts of the country.

Regional depository librarians continue to believe in the intrinsic value of their tangible collections. Without these collections being available in multiple locations around the country, the American public would be at a significant loss to access permanent, authentic government information in a timely manner. As has been shown in reports by the GPO and confirmed by depository librarians in the field, not all government information is available online, especially historical material. Even government information that is available online is not always presented in a usable form. No one argues the valid need for multiple "complete" depository collections, but new trends of information access, remote delivery, and library use argue for allowing GPO and regional depositories some flexibility in the placement of collections in order to respond to space constraints for all library materials.

While the tangible collections in regional depositories do provide access to government information, there are still issues associated with their access and preservation. One key to using these collections is providing the same level of bibliographic access as the library's other collections. Most regional depository libraries lack complete online catalog access to older (pre-1976) federal publications. The lack of a complete inventory and description of tangible depository collections creates an enormous gap in access which affects all regional depositories' ability to provide reference assistance to the user community. This is one of several places where the expertise of the regional depository staff ensures that this less accessible information is, indeed, found. In addition, many regional depositories house materials that are over 100 years old, and in some cases over 150 years old. There are preservation issues that can be readily identified: acidic paper, general wear and tear from decades of use, lack of archival-level temperature and humidity controls, and degrading microfiche formats. Given the scope of the issue (a regional depository collection can be over one million pieces), it is nearly impossible to successfully preserve all items in 52 legacy collections, and a consortial approach to preservation will be essential to assure sufficient resources are available to permanently preserve government information.

Though acquisition of new tangible publications has slowed for depository libraries, regional depositories continue their work to build complete collections. However, it cannot be assumed that any of the 52 regional depository collections currently existing nationally are complete. Regional depository libraries suffer losses through years of use, theft, and catastrophic events such as fire, flood or weather events. Obtaining replacement or extra copies of publications from selective depositories' discard lists is an important part of a regional depository's mission. The legacy print collections at multiple regional depositories facilitate the recovery of disaster-affected libraries, either through providing extra copies, creating digital surrogates, or filling ILL requests.

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Regionals also collect publications generated by federal agencies at the local or regional levels which escape inclusion into the FDLP. By gathering these publications, regional depository libraries provide government information that may have previously been unavailable to users residing outside of that region. Though information dissemination is changing, regional depository collections are dynamic, distinctive, and important. The current wording in Title 44, Chapter 19, reflects an outdated picture of the government information landscape, and lacks the flexibility needed for management of tangible depository collections in a fast-changing environment.

Staffing and service to selective depositories

Tangible collections, digital technology, education, training, promotion and service to selective depositories are all integral aspects of being a regional depository. The backbone on which all of these initiatives rely is the regional depository staff. As libraries' goals and missions have changed based on the needs of their populations, libraries have re-allocated staff and revised or created new job descriptions. Where a regional depository library may have had a separate department staffed by multiple individuals whose positions were solely dedicated to government information, many regional depositories have now merged their operations with other library units which have staff members with a broader range of public and technical service responsibilities. Past staffing levels were based on collecting and maintaining a tangible collection and providing specialized reference service. As the number of items received in tangible form has dropped and reference questions have become fewer, yet more complex, library administrators have typically chosen to reduce the number of staff devoted to depository operations.

While staffing levels shrink, regional depository libraries are still required to build and preserve a complete tangible collection for the state/region; maintain knowledge of tangible and digital collections to provide necessary reference service; provide training and education opportunities for their institutions, selectives, and the public on government information in all formats; and provide leadership within their state/region regarding government information.

Service to selective depository libraries was a primary goal of the establishment of regional depository libraries. Providing reference service, collection sharing through interlibrary loan, and the responsibility to serve as the region's comprehensive archive for depository materials are functions explicit in the law. Of these requirements, reference service and ILL have always reached across state boundaries, but with digital distribution of depository material and virtual reference services firmly established, boundaries of these services no longer recognize physical geographic limitations.

As greater numbers of selective depository libraries begin to rely on substituting digital products for tangible titles, selective depositories' collections are being heavily weeded of paper publications resulting in an increased number of withdrawal lists. Regional depository services require sufficient staffing for records management, searching, and responding to discard requests. With the choice to rely on electronic resources, selective depository libraries have reduced their selection rate of items or, in many instances, have withdrawn from the FDLP entirely. The impact on the regional depository is apparent: space is consumed by tangible copies that have been added in order to serve as the state's sole archival library; preservation activities and costs increase to care for aging legacy collections; and ILL requests increase in order to deliver relinquished content to former selective depositories.

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Staff downsizing, varying levels of experience or engagement, financial limitations, and inconsistent training support affect the quality of service provided by regional depository librarians. Site visits, which are advocated in order to enhance communication and develop a sense of common purpose within the depository community, are not universally possible due to large numbers of libraries within a region, distance between libraries, or lack of travel funding. One way to address these shortfalls would be to use the established network of regional depository libraries that already exists to share expertise and facilitate information sharing. This is a natural vehicle for cross-border collaboration for not only improved services, particularly training, but for other collaborative initiatives such as preservation and collection building. Developing web-based training opportunities that do not require travel time or costs is another means to improve use of depository resources in the electronic environment.

Regional depository librarians want to serve selective depositories and improve access to government information for the public. However, the number of staff in regional depository libraries will not increase in the near future. Regional depository librarians now require flexibility to shape their services and collections in ways that make the most effective use of staff time and reflect the new realities of access to government information.

Technology

The technological changes that regional depositories face in managing their collections are the same as those faced by all libraries. In the past fifteen years depository libraries have been called upon to add sufficient computer work stations for both the libraries' primary clientele and the general public. These costs are ongoing as libraries must frequently upgrade and replace hardware, software, and network infrastructure to maintain increasing information demands.

Digital access to government information has made materials available from multiple locations, and new partners are being asked to assist the public with finding and using government information. Non-depository libraries are increasingly fielding requests for assistance with government information and e-government services. Therefore, regional depository librarians may be called upon to provide more educational services to libraries and other service centers within their regions in the future. All libraries will face increased resource demands associated with digital information and increased referrals from government agencies. Additional staff time is needed for personalized assistance, more computer workstations for e-government services, and longer operating hours to facilitate access for those without sufficient access at home or work.

Many regional depository libraries participate in efforts to convert legacy government information to digital formats in order to effectively bring their collections to users. These demands will only increase, and it is likely that regional depository libraries will be called upon to provide "scan on demand" services for selective depositories and members of the general public. This can be seen as an expansion of existing ILL services, and this fits with regional depository services. However, such an expansion of service would call for more staff time for digitization activities and additional hardware such as scanners and servers for storing and accessing converted content. Digitized content will expand access for those who have robust internet access at home, work, or school, but regional depository librarians are also cognizant of the digital access problems faced by those in rural and economically-depressed areas. This is one of many reasons that regional depository librarians continue to place value on the maintenance of tangible collections.

REGIONAL DEPOSITORY LIBRARIANS' JOINT PERSPECTIVE

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All libraries are dealing with the lack of proven digital preservation for born-digital materials. Born-digital materials that lack geographically distributed back-up copies are susceptible to loss and alteration for many reasons, such as data degradation and corruption, human error, political motivations, and natural disasters. Regional depository librarians understand the tremendous value of born-digital government information and want to make certain this content is available to the public for long-term use. It is possible that regional depository libraries will contribute to a distributed digital preservation program. To make this happen, depositories will need to develop the technological infrastructure, staffing and workflows necessary to facilitate ingest, storage, preservation, and migration of data. A distributed system of preservation, where a particular library may be responsible for the content of a handful of agencies, would provide the security necessary to safeguard information and place more manageable demands on these volunteer libraries.

Funding

Funding plays an integral part in all of the previously addressed issues. An examination of larger trends in regional depository library funding, and library funding in general, will highlight how these trends may affect future services. It is worth noting that all regional depository libraries are situated in public sector institutions (63% in public higher education institutions; 29% in State Library institutions; and 8% in public library institutions). Financial pressures on public sector institutions are increasing in all areas of responsibility, including basic infrastructure, health and public safety, and environmental controls. As public sector institutions, regional depository libraries are heavily affected by the budgets and priorities of their larger "hosts" (i.e., state governments, universities, municipal governments). All libraries, including regional depositories, find that they have to do more with less.

All types of libraries are facing the pressures of finite resources to carry out their missions. Libraries require funding for acquiring information and for providing services to support that information, such as cataloging and metadata and the purchase of resources to provide additional intellectual access. In addition, libraries require funding for user support as well as library outreach and education, both to end users and library staff. Funding is also required for housing and preserving tangible collections of all types, and for supporting the information technology in all of these areas. Libraries must also plan for future initiatives, such as digitization and reformatting analog information into digital, accessible-anywhere collections.

In order to reallocate resources in a changing environment, libraries are increasingly integrating services into merged service points. Multiple service points, built around specialized collections, such as government information, are coming to an end in many libraries. This aggregation holds many benefits—staffing, equipment, and facilities costs can be consolidated and economies of scale may be realized. In this environment, "one stop shopping" becomes a real possibility for the user. However, such a staffing trend incurs more staff training costs for the institution as more staff who have never worked with government information are now expected to do so. It could also lead to libraries where the staff "know a little about a lot," but do not have the depth of expertise to assist with more complicated government information queries.

Space issues are perhaps one of the single biggest drivers and stresses on finite resources. Libraries must continue housing acquired materials (FDLP and other), but they also have a need to

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provide adequate user spaces. An encouraging trend in many libraries these days is that they are very popular spaces for their users. However, this popularity creates its own set of demands on space. In academic libraries, for instance, gate counts and building use are continually rising, not just for research, but because libraries provide spaces for users to work collaboratively, read email, study, and socialize. This means that libraries face two potentially competing space pressures: to house and preserve a growing volume of existing and future content and to provide more user spaces. Bearing in mind that it costs approximately \$250 per square foot to build library space, this is not an insignificant challenge. Offsite storage facilities for materials offer some efficiency in this area but still require local support and capital investment.

What does it cost to be a regional depository and how have those costs changed over time? FY1991-1992 data collected through an Association of Research Libraries (ARL) study of ARL regional depository libraries estimated average annual local expenditures in support of regional depository operations to be \$300,000. These figures include costs for staff, cataloging and processing of collections, additional databases and reference materials in support of FDLP collections, and equipment/supplies, such as computers, microform equipment, and collections maintenance supplies. However, these figures did not account for facilities costs associated with FDLP collections, e.g., the costs for building library spaces, shelving, electricity and other consumable resources.

FY2003-2004 data collected through a similar ARL study of regional depository libraries estimated \$330,000 in the same average yearly expenditures. The relatively small increase in overall expenditures may be a reflection of efforts already underway in many libraries to consolidate technical processing, service points, and public services in libraries. They may also be indicative of the decline in tangible distribution of FDLP materials and associated processing costs.

An FY2007-2008 cost study by two regional depository librarians attempted to factor in the long-term costs of housing FDLP materials as measured by existing occupied space costs. They found that a typical regional depository library spends approximately \$700,000 in yearly amortized costs for facilities to house the collections. This figure reflects what institutions have already spent in building spaces to house collections, not new construction. Regional depositories have already built collections spaces but, given current Title 44, Chapter 19, requirements for collection retention, they will need to build more. In addition, regional depository libraries will need to build more user spaces and provide services. Given finite resources, it will be a challenge to keep up with both demands adequately. User needs are paramount and these needs are changing constantly. It is becoming increasingly important to build or restructure libraries in ways that make them user friendly and supportive, thus putting more pressure on space for collections.

Conclusion

Libraries have a long history of collaborating to offer needed information and support in the face of finite resources. Our system of nationwide resource sharing known as interlibrary loan is a good example of this. All participating libraries in the FDLP are frequent users of this national collaborative library effort. Similarly, the creation of Selective-Regional tiers within the FDLP is another effort at such collaboration between libraries. This tiered system allows selective depository libraries more latitude in their retention of depository materials, but ensures future availability of federal government materials for users at regional depository libraries. Today, more

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collaboration is required for the future success of the FDLP. A revision of Title 44, Chapter 19, that will allow a more flexible approach to regional depository management is needed to ease the pressures of finite resources. The information environment has changed dramatically since 1962, and regional depository libraries need flexibility to shape their services and collections to fit the new modes of information access, to make the best use of their resources, and to best meet the government information needs of the general public.

(revised 5/19/08)

DRAFT



American Association of Law Libraries
MAXIMIZING THE POWER OF THE LAW LIBRARY COMMUNITY SINCE 1906

Ann T. Fessenden
President, AALL

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Thomas F. Eagleton U.S. Courthouse
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May 14, 2008

Richard G. Davis
Superintendent of Documents and
Director, Library Services and Content Management
U.S. Government Printing Office
732 N. Capitol Street, N.W.
Washington, D.C. 20401

Dear Mr. Davis:

On behalf of the American Association of Law Libraries (AALL), I would like to thank you for seeking our comments and those of selective depository libraries to incorporate into the report requested by the Joint Committee on Printing (JCP) on the conditions of regional depository libraries. It is our understanding that, based on a legal memorandum from the Congressional Research Service (CRS), the JCP decided to not approve the proposed shared regional designation between the University of Kansas and the University of Nebraska at Lincoln. At the same time, JCP raised concerns that the request signaled growing challenges confronting regional depository libraries. As the national organization representing law librarians who serve a wide variety of library patrons, AALL is well aware of the challenges articulated by the JCP, and we are honored to have the opportunity to express our own concerns regarding shared depositories.

Our Interest in a Vital Federal Depository Library Program

AALL is a nonprofit educational organization with over 5000 members nationwide. Our members respond to the legal information needs of a variety of users: legislators, judges, and other public officials at all levels of government, corporations and small businesses, law professors and students, attorneys, and members of the general public. AALL's mission is to promote and enhance the value of law libraries, to foster law librarianship and to provide leadership and advocacy in the field of

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legal information and information policy. AALL has long been a strong champion of the FDLP and the public's right to access federal government information at no cost through participating depository libraries. Depository law libraries exist at academic law schools, in federal agencies and courts, and within state and county governments.

Since the Federal Depository Library Program (FDLP) is built on the successful relationship between a regional library and the selective depository libraries each regional serves, it is important that the viewpoints of all depository libraries be considered as part of this report. It is up to the depository library community collectively to form a consensus on how to ensure a robust FDLP that serves all users well in the 21st Century. AALL is very supportive of the existing structure of regional and selective depository libraries because the system has worked very well. Even though some regionals may have space constraints due to the size of their tangible collections, there are no restrictions that we're aware of to keep them from storing some materials remotely or entering into shared housing agreements with other participating libraries in their states. And with the new emphasis on electronic access over tangible distribution, we are reassured that the FDLP has a vital future because new libraries, including two law libraries, have recently joined the program.

Our Concerns with Challenges to the FDLP

One of the most important reasons why the current structure of regional and selective depositories is necessary is because our users need to be assured that the legal information they locate, use and rely upon is both official and authentic. Depository law libraries collect and provide access to these primary, authentic legal materials distributed to them in tangible formats through the FDLP. The integrity of these FDLP materials is not questioned because of their tangible form. This "tangible equals authentic" principle is reflected in retention requirements set forth for regionals in Chapter 12 of the *Federal Depository Library Handbook*, a publication written by and for the FDLP community. According to that document, regionals are required to retain print and microfiche copies of FDLP materials because "[t]he principal responsibility of a regional depository library is to ensure the comprehensiveness and *integrity* of Federal depository resources..." (p. 139, emphasis added).

In turn, selective libraries can rely upon the FDLP materials maintained by the regional libraries as a reliable, authentic source of the law. When the issue of shared regionals across state lines was first broadly discussed at the Spring 2006 Depository Library Council meeting in Seattle, many selective depository librarians expressed the need to be able to refer a user to a relatively close regional library in their state. This is especially important for the legal community who require access to official and authentic documents.

The Internet could provide our patrons with easy electronic access to government documents as a substitute for the tangible materials, as long as those documents are certified as official and authentic. As you know, AALL has taken a national leadership role on the issue of digital authentication because the ability to authenticate online legal resources is especially important as

government moves to a more electronic environment. We are pleased that AALL's Acting Washington Affairs Representative, Mary Alice Baish, recently had the opportunity to testify in support of full funding for GPO in FY 2009 before the House Appropriations Committee Legislative Branch Subcommittee. Her statement reflects our support for GPO's move to a more electronic program and the enhanced capabilities that the Federal Digital System will bring, particularly in the area of digital authentication. All users of online government information need to be assured that the information they find is reliable and trustworthy.

We are very pleased with the progress that GPO has made during the past year on digital authentication by implementing digital signatures to certain electronic documents on GPO Access, including its online collection of authenticated Public and Private Laws of the 110th Congress, as well as GPO's digitally signed version of the *2009 Budget of the United States Government*. This establishes GPO as *the* trusted information disseminator for the Federal government by providing the assurance that these electronic documents have not been altered since GPO disseminated them. However, until all federal documents are similarly authenticated, we simply cannot yet rely on electronic resources as a substitute for a tangible collection.

And while we also applaud the efforts of many regional and selective depository libraries who are involved in digitization projects, it is necessary to point out that the digital files resulting from non-GPO scanning of these legacy materials are not authentic.

Our Commitment to a Strengthened FDLP

In light of the Joint Committee on Printing's decision on the proposed Kansas-Nebraska merger, we are very concerned about multi-state plans such as that being proposed by the Association of Southeastern Research Libraries (ASERL). This coalition of research and state libraries across ten southeastern states, from Virginia to Louisiana, works to develop successful inter-institutional resource sharing and other collaborative efforts. Their proposal for collaborative collection management partnerships across state lines for the regionals in these states raises very serious questions, however. We fail to see how it will improve public access particularly given the public's need to have ready access to official and authentic federal documents. ASERL members seem to also believe that the current network of regional depository libraries is overly redundant. We respectfully disagree. We believe that when GPO collects and compiles data from the regional libraries, you will find that the current system is working well.

We recognize that even in tight budgetary times, it is important that regionals continue to serve their respective selectives. In order to do so, each regional should be encouraged to sufficiently staff its federal government documents section to provide both the assistance and expertise needed by its selectives and the public whom they serve. When the regional finds that its limitations are such that it may not be able to fully provide those services, then it is paramount that the regional work closely

with its selectives to develop a plan that will allow for the delivery of services. This approach would also be appropriate in providing access to material, especially the legacy material, held by regionals.

Unfortunately, we rarely take the time to applaud the excellent leadership and services that most regionals provide to their selectives and indeed to all members of the public served within their regional system. That said, because of budget and staff constraints, some regionals have difficulty providing the full array of services that is required of them. In these situations where the system is not working, we need to explore other models that will improve public access to the communities served within their regional structure.

One such approach when a regional is overly burdened is the model being developed in Indiana, where various depository libraries throughout the state are willing to share collection and service responsibilities based upon their expertise. This new collaboration for resource sharing was developed by the Indiana Networking for Documents and Information of Government Organizations (INDIGO). They are working on what they call the Indiana Light Archives Documents Project for federal documents and related services. The state's selective depository libraries are meeting the challenge by taking parts of the regional library's tangible collection through shared housing agreements and providing services to them.

We do not advocate a one-size fits all approach to resolve the issue of how to strengthen public access when a regional library is overburdened. However, we do believe that other approaches may be developed that meet the current statutory requirements and enhance the federal government information needs of the users within each region. A multi-state approach would tend not to meet these criteria, particularly given the public's need to have ready access to authentic government resources.

In closing, we again commend you for seeking comments from the broad library community on the regional study requested by the JCP. We believe the study offers us all the opportunity to examine possible new ways of providing federal government information through the system of regional and selective depository libraries. Well-funded regionals with their dedicated staff have provided excellent leadership and services for many decades, and the selective libraries they serve rely on their support.

We look forward to further discussions about how we can all work together to ease the burdens of the regionals that are having difficulty meeting their requirements, perhaps along the lines of the Indiana model or other shared housing agreements within the region. We do not support a model, such as that proposed by ASERL, for collaborative collection management partnerships across state lines. We are aware of efforts to seek a legislative fix to reduce the burdens on regional libraries. However, we are concerned about opening up Title 44 at this time, particularly when there is no consensus on what changes to the current structure would be acceptable and meet the goal of enhancing the public's access to federal government information.

AALL welcomes the opportunity to play a role in redefining the regional system and we look forward to continuing to work with you on this effort. Thank you very much.

Sincerely,



Ann T. Fessenden, President
American Association of Law Libraries

ALA American Library Association

May 26, 2008

Cynthia Etkin
U.S. Government Printing Office
732 North Capitol Street NW
Washington, DC 20401

Re: American Library Association's response to request for comments

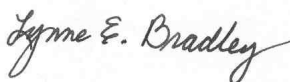
Dear Ms Etkin:

On behalf of the American Library Association (ALA), I am writing in response to the Government Printing Office's (GPO's) request for comments as part of the study on the conditions of regional depository libraries. We appreciate the opportunity to comment and welcome the study as the first in a series of efforts to ensure the Federal Depository Library Program (FDLP) continues to provide no-fee public access to critical government information in the digital age.

We recognize that many complex issues face FDLP library participants including: (1) space, budget, and staffing constraints; (2) provision of expert services; (3) deteriorating and uncatalogued print collections; (4) permanent public access to electronic government information; (5) technological change; and (6) collaboration on access to collections and services. To that end, we have included more detailed letters from two key units of ALA that deal with government documents – the Association of College and Research Libraries (ACRL), and the Government Documents Roundtable (GODORT). These letters reflect a diversity of concerns, challenges, and ideas with respect to the current and future role of the FDLP.

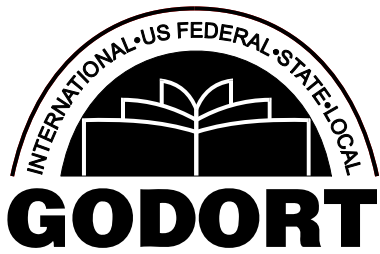
Thank you for the opportunity to submit comments as you work to gather information on the state of regional libraries in the FDLP. Given the complexity of this program and the thousands of libraries and millions of users affected, we ask that you provide us more opportunity to elicit concrete suggestions. Through dialog and collaboration, we can work together to identify successful strategies for meeting the challenges of providing no-fee permanent public access to government information in the digital age. ALA looks forward to continuing this very important conversation as GPO completes the study and considers more effective means to ensure the public's right to know.

Sincerely,



Lynne Bradley
Director
American Library Association Washington Office

Attachments



Government Documents Round Table • American Library Association

Michele McKnelly,
Chair
ALA Government Information Subcommittee

May 8, 2008

TRANSMITTED VIA E-MAIL

Dear Michele,

GODORT is pleased to see the Committee on Legislation (COL) and the Government Information Subcommittee (GIS) taking the lead in coordinating an ALA-wide response to the study requested by the Joint Committee on Printing (JCP) on the “State of Regional Depositories in the Federal Depository Library Program” (FDLP). GODORT leadership has worked with our Legislation Committee, The Federal Documents Task Force and our membership to gather information in response to your questions. As you might imagine when querying a group of depository librarians and government information professionals there are as many views on the future of the Regional Depository Libraries as there are librarians.

1. Turning first to the ‘crisis in structure of the FDLP’ and the issue of selectives leaving the program: it is difficult to extrapolate, from the many disparate issues facing Regionals, specific crises that cut across the entire program. Many of the dynamic challenges affecting libraries in general are faced also by the FDLP. Space, staffing, aging collections, increased operating costs and dwindling budgets, to mention just a few, challenge the government information librarian as surely as they do library administrators. GODORT recognizes that faced with these challenges there is the potential that some Regional libraries may elect to relinquish their status in the FDLP if opportunities for new structures are not supported. We believe that GPO should make every effort to ensure that Regionals have the support they need to stay in the program.

In discussing selectives leaving the depository program the Subcommittee on Attrition and Retention (SOAR) organized by the Depository Library Council (DLC) in 2002 expressly dealt with the issue.ⁱ Although it is several years old, the range of issues and responses identified in that document remain relevant to this discussion. GODORT believes it is important to not approach the issue as a crisis, but as a challenge to be met by a new vision that embraces 21st century collaborative solutions. While it is certainly true that selectives have left the program it is also true that new libraries have joined the program while other entire communities of users, such as tribal colleges, are clamoring to be admitted.ⁱⁱ

Additionally, large selectives – those at 75% and higher - face many of the same challenges as do the Regionals but often with less support for their mission. If we are to maintain the excellent level of service that the public has come to value from depository libraries, GODORT believes it

would be more appropriate for the Government Printing Office, in responding to the JCP's request, to look at the situation in both the Regional libraries and in the larger selective depository libraries.ⁱⁱⁱ

Overall, GODORT is less interested in the 'cause and effect' of the changing environment but rather in ensuring a healthy environment for growth and cooperation in the FDLP so that the Regionals and selectives can continue their partnership in providing no-fee access to government information.

2. Provision of expert services remains a challenge as institutions streamline and downgrade government information collections and departments. Simultaneous with this change is the growing demand for knowledge leaders who can provide support for the users of e-government services.^{iv} The FDLP is one such community of leaders that can provide this level of expertise and assistance. As ALA formulates a response to the study requested by the JCP GODORT believes it is imperative that the depth of knowledge possessed by librarians in the FDLP is acknowledged and that is communicated to the JCP and GPO that unless there are changes to the system the public may lose access to these experts.
3. Aging print collections are a looming *slow fire* in the depository community. GODORT recommends that all FDLP participants determine collaboratively how best to maintain our tangible collections. This may mean looking at different methods for managing them than we have in the past, including shared housing or off-site storage for little used materials. There is as of yet no data to support a suggestion that shared housing or off-site storage in any way hinders access by users or the care of depository material when it is cataloged and appropriately preserved. However we respond we must recognize that while the future of the program is electronic, the tangible documents in our collections represent the public history of our nation and that library administrators owe that material responsible stewardship. ALA should encourage GPO to continue its clear communication with depository library administrators to this end.
4. While geography is an important consideration when looking at how Regionals and selectives interact, for example states like Alaska, California and the Dakotas have all been 'stretched' to be served by the Regional system, the relationship between the Regional and selective depositories has always been as much about individual personalities as it has been the structure of the FDLP. This does not obviate the responsibilities of Regional libraries to provide support to their selectives. However, the dynamic challenges mentioned in point one above have made demands on many libraries so that it is difficult, if not impossible, for Regional depository librarians to provide the level of leadership that participation in the program requires. Exploring new administrative structures is an appropriate response in such an environment. The vision document prepared by the Depository Library Council in 2006 is a good jumping off point for such an effort.^v
5. Has access by the public to no fee-government information been diminished by pressures on the Federal Depository Library Program? Certainly there have been many suggestions that this has been the case but these are primarily anecdotal in nature. There has been no quantitative study that conclusively demonstrates that diminished access to public information (excluding classified

and otherwise secure information) is directly attributable to changes in the FDLP. GODORT urges the Government Printing Office to provide documentation of changes in access so as to better demonstrate how or if service in FDLP institutions has indeed diminished.

As ALA prepares a response to the GPO study on the state of the regional libraries in the FDLP the Government Documents Round Table urges that ALA's approach be cautious and supportive. The Government Printing Office and ALA have long been partners in the provision of government information and we believe that it is important to not approach our Associations' response with preconceived notions of "crisis" or "lost access" before the final report is actually produced.

Again, on behalf of GODORT I thank you for the opportunity to provide guidance to ALA. We look forward to continued participation in developing ALA's response to the Government Printing Office study.



Bill Sleeman
GODORT Chair
Thurgood Marshall Law Library
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501 West Fayette Street
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410-706-0783 (office)
bsleeman@law.umaryland.edu

ⁱ SOAR – Suggested Responses to Frequently Cited Reasons for Leaving the Depository Library System. 2002.
http://www.access.gpo.gov/su_docs/fdlp/council/soar-suggestions.pdf

ⁱⁱ ALA CD#20.2 (2008), Resolution on Tribal College Library Membership in the Federal Depository Library Programs (FDLP), which reads: "That the American Library Association (ALA) supports the membership of tribal colleges in the Federal Depository Library Program; and that the ALA works with the Government Printing Office (GPO) to assist all tribal colleges interested in joining the FDLP."
<http://www.ala.org/ala/ourassociation/governanceoffice/council/councilactions/2008mwca.cfm>

ⁱⁱⁱ Selectives are also excluded from the expectation to retain all publications and to serve other FDLP libraries, although most still do this. Nevertheless, the burden of participation in the FDLP on the larger selectives should not be overlooked. A complete discussion of the requirements for Selectives may be found at
<http://www.fdlp.gov/handbook/index.html>

^{iv} Bertot, John Carlo, Et al. *Drafted: I want you to deliver E-Government*. 2006. Library Journal.
<http://www.libraryjournal.com/article/CA6359866.html>

^v Depository Library Council. Knowledge will forever govern. 2006.
http://www.gpo.gov/su_docs/fdlp/council/dlcvision092906.pdf

NOTE: Comments to be submitted via online form on GPO site, not on ACRL letter head.

Dear Mr. Davis and Ms. Etkin,

I am writing for the Association of College and Research Libraries (ACRL), a division of the American Library Association, to offer comments as you prepare your report for the Joint Committee on Printing. Of the 53 regional Federal Depository Libraries, almost two thirds are affiliated with academic institutions. As such, ACRL has a great interest in this issue. ACRL and ALA have supported shared regional depository libraries in the past. ACRL, on behalf of our 13,500 members, continues to do so in principle.

We think the salient question at this point is, "What is the appropriate model for providing access to government information to 21st century audiences?" This is not only an issue as it relates to depository libraries and federal documents but to our collections in total. Providing access to information of all kinds is part of a larger shift in libraries in the 21st century. The broader library community increasingly engages in activities like consortial buying and digital delivery of collections as part of this shift. While we recognize that there are significant organizational, financial, space, and other challenges in operating a regional depository library, we think that employing cooperative models and practices could improve public access to Federal depository resources.

We see the question around access to government information as a critical issue and are concerned about the timeline for the survey of regional depository libraries and the short comment period. This is a complex issue involving hundreds of organizational and institutional stakeholders. We would much rather have a thorough sense of the state of regional depositories, including partial depositories in order to offer more substantial comment, but the timeline has precluded this.

We do recognize the nature of pressures experienced by regional depository libraries, in line with the stated purpose of the current study you are undertaking. They include:

1. increasing pressure on physical space for collections
2. increasing interest in providing services based on digital collections
3. increasing need to balance processing and access to digital collections with processing, access to, and management of legacy paper collections
4. the need for collaborative approaches to managing legacy paper collections across both regional and partial collections, including expedited "needs & offers" procedures that might underlie such efforts
5. the overall situation about multi-state repository collections
6. fiscal pressures on staff, facilities, and the transition to digital services

ACRL believes that collaborative work supports libraries' ongoing strategies for balancing digital and tangible resources from the government and from all other sources as well. We understand at the same time that many people in the library community are concerned about the long term quality of government information services, and ACRL is convinced that the quality of services associated with collaborative efforts may be even stronger.

In ACRL's June 26, 2007, letter reacting to the guidelines for shared regional depository libraries, we noted: "Flexibility and simplicity are critical to the success of rethinking models for housing and delivering government information to our various constituents." In the case of the University of Kansas and the University of Nebraska, they are constrained by the interpretation of the current statute. We support the solution they proposed, believing regional Federal Depository Libraries can develop effective models for cooperation and future collaboration that serve their users well.

ACRL is a proponent of reconsidering Title 44 so that it ensures excellent access to government information while allowing for innovations as libraries work to provide this service. Regional depository libraries are self-funded and voluntary participants in the Federal Depository Library Program. They play a critical role in providing public access to government information, and we support allowing them flexibility to collaborate, innovate, and experiment in order to thrive.

Thank you for giving us the opportunity to provide comment as you conduct your study on the condition of and factors influencing the success of regional Federal Depository Libraries. We urge you to consider any information obtained through this current study period as only a first step and to continue exploring the issues in more depth over the next several months.

Sincerely,

Julie Todaro
ACRL President, 2007-2008

From: kmalenfant@ala.org
Sent: Friday, May 16, 2008 1:46 PM
Subject: Regional Depositories Study Comments

Form Submission Results...

Your Name: Julie Todaro, Pamela Bluh, & Sara Kelly Johns

Your Email Address: kmalenfant@ala.org

Library Type: Other

I am responding on behalf of a: Library Association

Comments: May 16, 2008

Note: This is an updated version of comments submitted on Tuesday, May 12, as an additional division of ALA has signed on in support. The content remains the same.

Dear Mr. Davis and Ms. Etkin,

I am writing for the Association of College and Research Libraries (ACRL), a division of the American Library Association, to offer comments as you prepare your report for the Joint Committee on Printing. Of the 53 regional Federal Depository Libraries, almost two thirds are affiliated with academic institutions. As such, ACRL has a great interest in this issue. ACRL and ALA have supported shared regional depository libraries in the past. ACRL, on behalf of our 13,500 members, continues to do so in principle.

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5. the overall situation about multi-state repository collections
6. fiscal pressures on staff, facilities, and the transition to digital services

ACRL believes that collaborative work supports libraries' ongoing strategies for balancing digital and tangible resources from the government and from all other sources as well. We understand at the same time that many people in the library community are concerned about the long term quality of government information services, and ACRL is convinced that the quality of services associated with collaborative efforts may be even stronger.

In ACRL's June 26, 2007, letter reacting to the guidelines for shared regional depository libraries, we noted: "Flexibility and simplicity are critical to the success of rethinking models for housing and delivering government information to our various constituents." In the case of the University of Kansas and the University of Nebraska, they are constrained by the interpretation of the current statute. We support the solution they proposed, believing regional Federal Depository Libraries can develop effective models for cooperation and future collaboration that serve their users well.

ACRL is a proponent of reconsidering Title 44 so that it ensures excellent access to government information while allowing for innovations as libraries work to provide this service. Regional depository libraries are self-funded and voluntary participants in the Federal Depository Library Program. They play a critical role in providing public access to government information, and we support allowing them flexibility to collaborate, innovate, and experiment in order to thrive.

Thank you for giving us the opportunity to provide comment as you conduct your study on the condition of and factors influencing the success of regional Federal Depository Libraries. We urge you to consider any information obtained through this current study period as only a first step and to continue exploring the issues in more depth over the next several months.

Sincerely,

Julie Todaro
ACRL President, 2007-2008

Co-signed,

Pamela Bluh
ALCTS President, 2007-2008

(The Association for Library Collections & Technical Services (ALCTS) is the national association for nearly 5,000 information providers who work in collections and technical services, such as acquisitions, cataloging, collection development, preservation and continuing resources in digital and print formats. ALCTS is a division of the American Library Association.)

and

Sara Kelly Johns
AASL President, 2007-2008

(The American Association of School Librarians (AASL), a division of the American Library Association, promotes the improvement and extension of library media services in elementary and secondary schools as a means of strengthening the total education program. Its mission is to advocate excellence, facilitate change and develop leaders in the school library media field.)

Upload Comments:

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ASSOCIATION OF RESEARCH LIBRARIES

May 12, 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,

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



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,



John Burger
Executive Director



Alliance Depository Librarians

April 25, 2008

James F. Williams, III
Dean of Libraries
University of Colorado-Boulder
184 UCB
Boulder, Colorado 80309-0184

Dear Dean Williams:

We, as members of the selective federal depository community of Colorado, believe that it is the responsibility of all depository libraries in the state of Colorado to ensure, to the best of their abilities, that Colorado citizens continue to have access to US government information now and in the future. A strong Regional Depository Library (RDL) is crucial to this task.

The RDL at the University of Colorado at Boulder is one of the strongest RDLs in the nation, providing excellent support for selective depository librarians on an ongoing basis as well as through special initiatives such as the IMLS grant "Government Information for the 21st Century." The selective depository community of Colorado desires that these strengths continue. The Report to the Congressional Joint Committee on Printing on the current state of regional depository libraries, due in June 2008, provides an opportunity for assessment of RDL activities and selective depository librarians encourage a thoughtful discussion of the responses to the report. A positive outcome can only benefit the future mission of Colorado depository libraries and the Federal Depository Library Program as a whole.

Among the services provided by the RDL to the selectives, several deserve highlighting:

Community of Experts: In many ways the RDL serves as the local voice of the Government Printing Office (GPO), providing interpretations, explanations, and updates of policies and regulations. Under the RDL's leadership, the Government Publications Interest Group (GoPIG) presents opportunities for depository librarians and staff to exchange ideas, share best practices and knowledge about collection strengths and areas of expertise.

Training: For many years the RDL has coordinated training on important resources and issues through forums such as the monthly GoPIG meetings, the COGOPUB-L listserv, and the above mentioned "Government Information for the 21st Century" grant, which extends training opportunities to non-documents librarians. Selective depository librarians have been encouraged

to offer training themselves to their colleagues, a two-way process that both sharpens skills and creates a sense of community among Colorado documents librarians.

Catalog Records: Depository Libraries need to have every tangible item cataloged at the piece-level, an activity that benefits library users and documents librarians alike for referrals to the RDL collection, collaborative collection management, interlibrary loan, and verification of the existence and holding of government publications. The resulting detailed awareness of individual documents is an obvious enhancement for their access and use by Colorado citizens and students. Of particular importance in this regard is the continuing effort by the CU-Boulder RDL to catalog and item convert its holdings to provide greater access to the legacy depository collection.

Access: The RDL has an important role to play with its provision of document delivery services including request and delivery via Prospector and duplication of materials (fax, scan, microform and CD-ROM reproduction).

Discard Process: Selectives need to have an expedited discard process; we are already well on the way to seeing this happen through a collaboratively developed uniform state plan.

Smaller Selectives: All the selective depositories benefit from the activities of the RDL, but smaller selectives are special beneficiaries. Our questions and needs range from advice about managing the collection, to requesting items not owned locally, to assistance with reference inquiries for users. Historically the CU-Boulder RDL has been knowledgeable, helpful, and timely in its responses, often going beyond the usual norms in its guidance to others. These services are equally important for librarians new to documents or new to the state regardless of the size of their selective.

State Plan: The state plan, referenced above, will not only outline services by the RDL, it will also provide an opportunity for the selectives to reciprocate by indicating their own responsibilities. In particular, a discard process both thorough and expedited should enable selective depositories to catalog what they retain and also inventory their current collections to the mutual benefit of their users and to other depositories.

In conclusion, the selective depository librarians of Colorado wish to acknowledge their deep appreciation of the strong leadership of the CU-Boulder RDL over many years past. It has truly exemplified the changing role of documents librarians from custodians of collections to trainers and educators of the worth of government publications. In so doing it has gained national recognition in the documents community. We, the selective depository librarians of Colorado, urge that the University of Colorado at Boulder Regional Depository Library continue its outstanding commitment to federal government information for the citizenry of Colorado.

Sincerely,
Alliance Government Documents Librarians

(Signature sheet is appended.)



Mark Anderson
University of Northern Colorado



Christopher C. Brown
University of Denver



Doug Ernest
Colorado State University, Fort Collins



Janet Lee
Regis University



Lisa Nickum
Colorado School of Mines



McKinley Sielaff
Colorado College



Louise Treff-Gangler
Auraria Library

APPENDIX D: GUIDELINES

Establishing Shared Regional Depository Libraries, August 28, 2007

DRAFT

Guidelines



August 28, 2007

Establishing Shared Regional Depository Libraries

The provisions of chapter 19 of Title 44, U.S.C., prescribe a structure for the Federal Depository Library Program (FDLP) consisting of regional and selective libraries, and set the conditions for the operation of the Program as administered by GPO.

Within this statutory framework, different models of sharing resources and responsibilities between regional and selective libraries within the states they serve have been implemented over the years, with GPO approval. These include different models of intra-state sharing between regional and selective libraries, and for sharing of some services between regional depository libraries in one state and selective depository libraries in an adjacent or near-by state where no regional library exists.

In recent years, technological innovations and the online information environment have made it possible for a number of depository libraries to participate in multi-state collaborations for rapid interlibrary loan and other services. Technological innovation and the online environment have also made it possible to develop models for sharing resources and responsibilities between regional depositories in different states and the selective libraries they support. These guidelines have been developed to assist libraries in planning for single state and inter-state shared regional libraries.

Both intra-state and inter-state shared regional models can offer practical and economical means to improve public access while achieving operational efficiencies for the participating libraries. These guidelines encourage libraries to use an open and collaborative planning process and to ensure that proposals submitted to GPO for approval are developed with the expectation of maintaining or improving public access to the depository collections. Proposals for shared regional collections and services within a single state can be approved by GPO. Proposals for shared regional collections and services involving two or more states will require approval of the Joint Committee on Printing because they involve the sharing of resources and responsibilities outside the jurisdictions the libraries were originally designated to serve.

Any arrangement for the sharing of the resources and responsibilities of regional depository libraries must be delineated in a written memorandum of understanding (MOU) signed by representatives of the participating institutions. While GPO is not a signatory of the agreement, the MOU must be shared with and reviewed by Superintendent of Documents prior to signing and implementation. This is to make sure there are no conflicts between the provisions of the MOU and

Title 44 of the United States Code and other FDLP policies. The GPO review also will ensure that all regional obligations for access, collections, and services will continue under the new agreement. A copy of the signed MOU should be transmitted to GPO. If the arrangement is intra-state, the participating regionals must notify the congressional delegation(s) of their state(s) of the new arrangement. If the arrangement is inter-state, the regionals must seek designation in accordance with 44 U.S.C. §1912. Once a letter from the Senators is received, GPO will request formal approval from the Joint Committee on Printing for the MOU to be implemented. The *Designation Handbook for Federal Depository Libraries* can provide guidance. It is on the FDLP Desktop at <http://www.access.gpo.gov/su_docs/fdlp/pubs/desig.html> and it was distributed to depository libraries as GP 3.29:D 44/3.

Guidelines

The following guidelines outline specific areas that need to be addressed in order to facilitate the process of establishing a successful shared regional. As new regional agreements are implemented and reviewed, additional guidelines and best practices will be added.

COMMUNICATION

- ♦ Consult with selective depository libraries in the state(s) and assure their concerns are addressed prior to signing an MOU.
- ♦ Keep the selectives in the participating state(s) informed through regular communications during the transition and implementation.
- ♦ Confer with and keep GPO abreast of plans and implementation schedules and activities.
- ♦ Obtain the support of the administrations from all participating libraries.
- ♦ Obtain the support of the state library commission or comparable authority.
- ♦ Review state plan(s) and revise accordingly.

COLLECTIONS

- ♦ Identify which regional is responsible for what part of the collections (date and SuDoc ranges).
- ♦ Specify where regional collections will be housed.
- ♦ Include responsibility of archiving and long-term security of the collection, as covered in the *Instructions to Depository Libraries* <http://www.access.gpo.gov/su_docs/fdlp/pubs/instructions/index.html>.
- ♦ Address a contingency plan for maintaining the regional collection(s) should the MOU be terminated or modified by one or more of the parties.

ACCESS & SERVICES

- ♦ Address how this agreement will maintain or, preferably, improve service to the public, including access to the tangible collection.
- ♦ Address how selectives, the public, and others will identify regional holdings (e.g., shared catalog, holdings of libraries participating in the MOU reflected in all their catalogs).

- ♦ Provide information as to how, where, and when depository resources can be accessed and obtained by the user.
- ♦ Address how participating institutions will retrieve materials from the regional collection and deliver to users (e.g., interlibrary loan, document delivery).
- ♦ Determine how services for the public and support services for selective depositories will be conducted (e.g., reference assistance, disposition lists, training).

MOU MUST INCLUDE:

- ♦ Assurance that the agreement will maintain or, preferably, improve public access and service, and the steps that will be taken to measure this activity.
- ♦ Clear statement indicating the allocation of responsibilities for collections and services among the libraries participating in the MOU.
- ♦ Clear statement indicating what services selective depositories will receive from each library participating in the MOU.
- ♦ Clear statement that all regional requirements/guidelines of the FDLP continue to be in effect.
- ♦ Provision for regular reviews of the arrangement that includes feedback from selective depository libraries.
- ♦ Procedures for modifying or terminating the agreement.
- ♦ Provisions for disposition or transfer of materials in the event of termination, or significant modification, of the MOU that alter responsibilities for the collection.
- ♦ Contact information for the regional documents coordinators.
- ♦ Signatures of the library directors, from all libraries participating in the MOU.