

Comments Received for GPO's Study of Regional Depository Libraries

As of 05/19/2008

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.

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.

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 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.

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.

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

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 FDLDP, 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 FDLDP 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.

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 University of ... 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 losing 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 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.

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].

Library Associations

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 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.

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 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.

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

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.)

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 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.

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.
