



ASSOCIATION OF RESEARCH LIBRARIES

August 21, 2006

Ms. Judith C. Russell
Superintendent of Documents
U.S. Government Printing Office
732 North Capitol Street, NW
Washington, D.C. 20401

Dear Ms. Russell:

Thank you for the opportunity to provide comments on the document entitled: "Proposed Revision of the Essential Titles List", issued in May 2006. The Association of Research Libraries (ARL) thanks the GPO for reaching out to the community for our input on this effort. ARL has reviewed the proposal and would like to provide the following comments.

ARL member libraries are very aware that many federal agencies, like all sectors including libraries, routinely utilize digital technologies. Agencies employ these technologies in support of their collection, management and dissemination activities. As a consequence, many publications have and will continue to migrate to electronic only formats. We appreciate that there are economic and importantly, productivity benefits to the agencies producing these digital publications as well as enhanced access through the utilization of digital technologies. In addition, this enhances public access to government, of great importance to the library community.

As the Federal Government embraces digital technologies, it will be important to ensure the authenticity and authority of the digital records, publications and services. To ease this transition, ARL supports GPO's proposal to identify core government information that will continue to be provided to the public through FDLs in paper format while issues related to authority and authenticity are resolved. We applaud GPO's efforts to ensure the authenticity of government-produced information.

As with other technological transitions, there needs to be an understanding that while the costs of maintaining traditional delivery and access programs will decline, some costs will continue until the new technologies provide the same levels of access and security. In this vein, ARL has been a continuous supporter of GPO's development of FDSys. Until that time that FDSys is functioning Congress does need to provide GPO with some funds to continue the distribution of core, essential titles to FDLs. GPO's proposal to continue to

provide titles selected by 85% of more of the FDLs ensures widespread, ubiquitous access to those titles during this transition. While GPO's proposal may seem stark when viewed by segments of the community, it does maintain consistent across the board access – an important goal for all Federal depository libraries.

Depository librarians do not shy away from utilizing digital information, and have in fact, welcomed such products and services by adding them into their library catalogs to improve access and encourage their use by patrons. If given the choice, depositories will continue to take advantage of digital formats, and many depositories will opt for digital over print or other tangible formats for the majority of their collections. They do so in large part in recognition that this is what users of government information prefer.

ARL supports established GPO criteria as defined in its policy statement "Dissemination/Distribution Policy for the Federal Depository Library Program" (SOD 301). It outlines important criteria such as usability, potential use as a reference resource, and a lack of adequate online equivalents. Another criterion we would like to suggest for consideration is the decision of the publishing agency. If the publishing agency makes the decision to print a publication, it is likely that the decision was based on consideration of what the primary user of the publication would find most useful.

ARL very much appreciates the opportunity to provide feedback on this proposal, and looks forward to working with you and GPO staff to continue to develop criteria for disseminating tangible publications which assures that the information needs of the public are met and the values of the FDLP are supported.

Sincerely,

A handwritten signature in cursive script that reads "Prudence S. Adler".

Prudence S. Adler
Associate Executive Director
Association of Research Libraries