

# ALA American Library Association

August 1, 2006

Judith C. Russell  
Managing Director, Information Dissemination (Superintendent of Documents)  
U.S. Government Printing Office  
732 North Capitol Street N.W.  
Washington, DC 20401

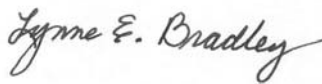
Dear Ms. Russell:

I am writing to you on behalf of the American Library Association to convey the comments of the Government Documents Round Table (GODORT) on the Proposed Revision of the Essential Titles List, released in May, 2006.

GODORT is concerned that the proposal will limit the flexibility in choosing materials and formats that best suit their clientele. They also express concern over the lack of a consensus on what makes a title "essential" and note that the popularity of a title does not necessarily indicate its importance.

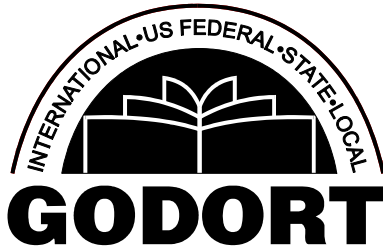
Please let me know if you have any questions or we can be of further assistance in this matter.

Sincerely,



Lynne Bradley  
Director, Office of Government Relations

Attachment: Letters from the Government Documents Round Table (GODORT)



Government Documents Round Table • American Library Association

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Judith C. Russell  
Managing Director, Information Dissemination (Superintendent of Documents)  
U.S. Government Printing Office (GPO)  
732 North Capitol Street, NW  
Washington, DC 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. GODORT's Federal Documents Task Force had an opportunity to discuss the proposal at its recent meeting at the American Library Association Annual Conference. The following comments are based on that discussion.

One of the key issues of most concern to GODORT members is the ability to locally determine which documents best suit their clientele. This flexibility in choosing the materials and formats is a key attraction of the Federal Depository Library Program (FDLP). The proposed methodology is flawed because it is based upon the false assumption that each depository serves only a single type of customer. The program was designed so that all citizens could have access to their government information, regardless of the primary constituency of the library. The FDLP must continue to allow the depository librarians, who are in the best position to evaluate local needs, to make informed choices of the resources and formats that are most appropriate to their local community's needs.

A common misunderstanding is that there is a Congressional mandate to make the primary means of providing publications to depository libraries in online format. In reality, Congress has never specified particular benchmarks nor has it required that a predetermined set of titles be used as a method for determining which publications continue to be made available in tangible format. GODORT again urges the GPO to continue to follow the Joint Committee on Printing's instructions to work in partnership with the depository community to transition the FDLP into a program that not only promotes the exciting opportunities for access provided by online information, but also respects the diversity of local information needs and provides the flexibility to meet those needs.

Depository librarians do not shy away from electronic information, and have in fact welcomed such products 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. But they should have the option of print if, in their professional opinion, print is the most appropriate format for certain titles. This “either/or” scenario is not in the program’s best interests nor does it follow the intent of the FDLP.

It is telling that after at least two separate surveys, no consensus has been reached on what makes a title “essential” and thereby eligible to be received in tangible format. This lack of consensus can be explained by the diversity among depository libraries and the constituencies they serve. The current proposed methodology for determining essential titles attempts to take into account the diversity of library users and interest by creating lists of titles by type of library. While this method does attempt to address the issue of the diversity of needs, we believe that the proposal is hampered by its assumption that essential titles can be defined as those selected by a preponderance of libraries. GPO’s proposal defines preponderance as 85% of all depository libraries. There is little evidence that any systematic research was used to arrive at this number. We believe that the 85% threshold in this proposal is too high and is an arbitrary measure that does not adequately represent the value of an individual title and its publication format to the local community.

Despite a primary designation as an academic, public or law library, it is common for depository libraries to serve multiple communities that have differing needs for materials. For example, a small college library in a rural area may simultaneously provide government scientific reports for faculty, legal materials for lawyers in the community, and social security information to seniors. The proposal’s creation of essential title lists by type of library does not provide libraries with diverse populations to adequately select titles in the format their users need. This example demonstrates the type of flexibility the program needs to retain.

We feel it is more appropriate to apply *specific criteria* to guide the decision-making about which publications would be distributed to libraries in tangible format, rather than continuing to explore methodologies that attempt to come up with a predetermined list of titles. We understand that a predetermined list of titles will help GPO control costs associated with tangible publication distribution. While GPO must be attuned to the financial implications of distributing materials in tangible format, we believe that this variable cannot become a primary factor in determining the appropriate format for publications distributed through the program.

Much of the criteria that should be used to determine appropriate format of publications is included in GPO’s 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. We believe that FDLP staff should not alter an agencies' original decision about publication format, and that the dissemination decision should be based on the agencies' knowledge of their primary audience for the publication. If the publishing agency makes the decision to print a publication, it is likely that the decision was based on a careful consideration of what the primary user of the publication would find most useful. In fact, many agencies have agreed to send tangible versions of their publications directly to libraries, since they recognize that tangible publications still are useful to some citizens. It is distressing to note that one of the fundamental cost saving features of the FDLP, centralized distribution of government publications, is being undermined in the current environment.

In the past, GPO had proposed a "print-on-demand" service to help meet the specific local needs of libraries for tangible copies of publications. Unfortunately, GPO stopped pursuing this proposal because of concern expressed about the proposed allocation of funds (\$500 per library) for the service rather than work with the community to create a flexible plan that will fit a variety of needs. One of the strengths of the FDLP is the diversity and ability of the individual libraries to meet the needs of their unique community. GODORT asks the GPO to reconsider further development of this service, keeping in mind that any "print on demand" service should endeavor to assure a quality product. Careful study of the real costs of the service, including a structured method for gathering information and evaluating depository library needs, should allow GPO to work with its oversight and appropriations committees in allocating the appropriate level of funding for the service.

GODORT appreciates the opportunity to provide feedback on this proposal, and looks forward to working with GPO staff to continue to develop criteria for disseminating tangible publications which assures that the basic needs of citizens are met and the values of the FDLP are supported.

Sincerely,

A handwritten signature in black ink that reads "Aimée C. Quinn". The signature is written in a cursive, flowing style.

Aimée C. Quinn  
Chair, GODORT

**cc:** Mr. Matt McGowan, Professional Staff Member, Senate Committee on Rules and Administration  
Ms. Kennie Gill, Democratic Staff Director & Chief Counsel, Senate  
Ms. Susan Wells, Staff Director, Joint Committee on Printing