

Report of Public Comments Received for Proposed SOD Policy: Print Distribution and Access to Government Publications in a Digital Federal Depository Library Program

February 28, 2025

Introduction

With the implementation of a digital first Federal Depository Library Program (FDLP), the development of a limited print distribution framework (PDT), which reduced the number of titles and copies of them, became necessary. This effort began in July of 2023 and in February 2024 the first library allocations of the limited PDT were released.¹

The new distribution framework required a revision of the 2006 Superintendent of Documents distribution policy. The Superintendent of Documents released a draft policy, *Print Distribution and Access to Government Publications in a Digital Federal Depository*, for public comment on November 13, 2024. The deadline for comments was January 18, 2025. All comments are shared in this report.

Proposed Policy

This is the proposed policy statement that was released for comment. The entire [SOD-PPS-7-2025 draft document](#) with background, footnotes, and links to cited information is publicly available.

The Superintendent of Documents has the authority to determine which in-scope Government public information is distributed through the FDLP, in what format, and the quantity. With this authority it is established that:

- Digital will continue to be the preferred format to make Government public information accessible, as it has been since 2006.⁷
- With a limited print framework, the Print Distribution Titles List⁸ will facilitate the selection and allocation of only those publications that the Superintendent of Documents determines are needed by depository libraries.
- Special Selection Offers⁹ (SSO) will be extended to depository libraries on an irregular basis for publications that have a special value when printed.
- At a minimum, each National Collection Service Area will receive at least one copy of all distributed print publications.¹⁰

¹ A report is available detailing the development of the limited print distribution framework, which includes how depository libraries participated in the process. See <https://www.fdlp.gov/file-repository-item/implementing-new-print-distribution-framework-report-fdlp-community>

⁸ In September 2006, the Superintendent of Documents policy, *Dissemination/Distribution Policy for the Federal Depository Library Program* (SOD 301), declared online versions of publications as the preferred format for disseminating information to depository libraries when the publications are available in both online and tangible formats. SOD 301: <https://www.fdlp.gov/file-repository-item/disseminationdistribution-policy-federal-depository-library-program-sod-301>

⁹ For more about Special Selection Offers see <https://www.fdlp.gov/project-list/special-selection-offers>

¹⁰ In an August 5, 2015, letter to GPO Director Vance-Cooks, the Chair of the Joint Committee on Printing, the Honorable Gregg Harper, conveyed the approval of the Superintendent of Documents' proposed regional depository library discard policy with the added stipulation that a "minimum of four tangible copies of the publication exist in the FDLP distributed geographically." Letter: <https://www.fdlp.gov/file-repository-item/correspondence-between-gpo-director-and-chair-jcp-regarding-discarding>

Summary of Comments

When the comment period closed on January 18, 2025, there were twenty submissions. Of those, eighteen were from Federal depository libraries. Both the American Library Association and the Depository Library Council provided comments via email.

Of the eighteen respondents from Federal depository libraries, 67% identified themselves as a depository library coordinator. Four types of libraries were represented by these respondents: Academic, General (50%); Public (22%); State (22%); and Highest State Court (6%).

In Question 3, respondents were asked to describe their opinion of the draft policy from a list of options. An overwhelming majority, 67%, indicated they “Liked” the proposed policy. “Have some reservations” and “Need to know more” were how 21% and 6% respectively, described their opinion. One declared they are “Neutral”, and nobody chose “Do not like”.

Question 4, the last entry on the comment form, was a text box where respondents could provide any comments or thoughts they had about the distribution policy. The comments from the American Library Association and the Depository Library Council emails are included in the table below along with the text responses provided by the other respondents of the call for comments.

There were sixteen entries with comments. About 31% (5) specifically stated they liked or supported the draft policy. Representative of that stance is this comment, “I think this proposed policy works well given that more and more people are seeking information and resources online.” More specifically, “I like the bullet point that recognizes at least one copy of each title on the PDT will be available in all four of the NCSA's. I also like the fact that "Digital will continue to be the preferred format," when appropriate.”

One person said they generally liked the policy but was concerned about the digital divide with underserved and unique communities. Other issues raised in the comments were preservation and the number of copies distributed to the National Collection Service Areas. A respondent asked the question, “Would it be helpful to add here, either in the body or a footnote, about how these print copies will be preserved?” The best preservation solution was conveyed in one comment as, “My suggestion is to raise the minimum number of print copies per service area ... ideally between 3 to 5. ... only having 1 preservation copy ... is really risking loss of materials.” Raising the number to increase access, “I think it would be more judicious to require more than one copy per continued print resource per National Collection Service Area. As the recent Hurricanes Helene & Milton show with their destructive force ... it would better for citizen access for more than one copy to be required.”

Most of the submissions were editorial in nature and offered wording, additional footnotes, or definitions to clarify and improve understanding of the proposed policy.

This is how one respondent concluded his comment, “The proposed draft policy statement succinctly addresses the current (and future) approach of the FDLP regarding the distribution of print publications.”

Responses to the Call for Comments

Question 1

I am ... (select the **most fitting** description)

- General public user of Federal Government information
- (12)** A depository library coordinator
- (2)** A regional depository library coordinator
- (1)** A government information librarian
- (3)** A librarian, other than a government information librarian
- An administrator at a library with a designated Federal depository library
- From a Federal agency or a Federal agency library
- From a library association/organization/consortium
- From a non-profit organization
- From the public sector
- From the private sector
- Other, please specify: _____

Question 2

I am from ...

- (9)** Academic, General Library
- (4)** Public Library
- (4)** State Library
- (1)** Highest State Court Library

Question 3

Choose the response below that best describes your opinion of the proposed policy.

- (12)** Like
- (2)** Need to know more
- (1)** Neutral
- Unsure
- (3)** Have some reservations
- Do not like

Question 4

Please provide any comments you have about the print distribution and access policy, or respond with N/A.

All comments received are included in the table as they were written. Four people responded N/A.

I think this proposed policy works well especially for libraries dealing with space issues for print publications. I think this proposed policy works well given that more and more people are seeking information and resources online.

This policy accords a great deal of authority to one person.

Regarding the fourth policy bullet point, I think it would be more judicious to require more than one copy per continued print resource per National Collection Service Area. As the recent Hurricanes Helene & Milton show with their destructive force, natural disasters are growing in frequency and power, and it would better for citizen access for more than one copy to be required. This will prevent issues of access due to a library being near a disaster zone and so difficult to access or an issue where a library with the one (1) copy being hit by the disaster and losing that area's only copy.

My suggestion is to raise the minimum number of print copies per service area much higher than 1, ideally between 3 to 5. My service area has ~15 states, so theoretically only having 1 preservation copy for all 15 is really risking loss of materials. Asking service areas to hold 1 volume per 5 states is hardly a burden, especially since the only system would have required 1 volume per state, and when there was greater volume of material being published. Asking ~15 states to have 3 or 5 copies among all of them is no burden, and is the best preservation solution. This is especially important in service areas like the south, with floods, storms, tornados, and other natural disasters annually effect FDLP members. Similarly, wildfires in the west are also a preservation concern.

I would like to see an explanation or definition of the National Collection Service Areas in this policy. A brief statement about the purpose of the NCSAs, and how they were established, perhaps as a link in the footnotes. Or a brief statement defining the NCSAs in the bullet point where it's mentioned under Policy section.

Not sure about the withdrawal policy but the purpose as written sounds like it is about digital content. Maybe "Establish a policy to distribute and to make accessible tangible Government public information through a digital Federal Depository Library Program (FDLP)."? Would this be the policy area to include print on demand replacement copies? For example, if a copy is lost due to damage.

Thank you for putting forth this policy and call for comments. Can you please include a reference to Title 44 in the text of SOD-PPS-7-2025. It is important to know how the law is now allowing for the FDLP to be a digital program after the many years of trying to make this possible.

I like the bullet point that recognizes at least one copy of each title on the PDT will be available in all four of the NCSA's. I also like the fact that "Digital will continue to be the preferred format," when appropriate.

Under the "policy" heading, bullet 2 may be somewhat confusing. "With a limited print framework, the Print Distribution Titles List will facilitate the selection and allocation of only those publications [add: "in paper format" ?] that the Superintendent of Documents determines are needed by depository libraries."

I am concerned about issues that this policy, as currently drafted, do not address. Specifically, I'd like to see explicit in the policy a commitment from the Superintendent of Document to receive feedback from the FDL coordinators, or at least from the Depository Library Council, about the titles and amount of titles printed for distribution to libraries. I also believe that further policy needs to be developed to give clear direction to FDL coordinators about requirements to retain the publications that are distributed under this policy, as opposed to the material distributed under previous policies. Regional FDL coordinators particularly need assistance with clear policy and instructions about how legacy collections and the material distributed under the current policy should be managed.

I can appreciate the need and desire to streamline and update SOD 301 based on the experience of the past 20 years and the direction of the Digital Federal Depository Library Program. The proposed draft policy statement succinctly addresses the current (and future) approach of the FDLP regarding the distribution of print publications. As such, I offer a few editorial suggestions for your consideration:

(1) The numerous footnotes and links in the draft are very much appreciated in that they pull together (and provide links to) relevant information that adds context to the document and enhances its understanding. I would suggest adding another footnote to define "in-scope Government public information." Specifically, under the POLICY section:

"The Superintendent of Documents has the authority to determine which in-scope [*] Government public information is distributed through the FDLP..."

ADD FOOTNOTE:

[*] See 44 U.S.C. Sec. 1902 for a definition of Government publications available through the Superintendent of Documents.

(2) Under POLICY, second bullet point:

"...those publications that the Superintendent of Documents determines are needed by depository libraries [ADD] in print format."

(3) Under POLICY, third bullet point regarding Special Selection Offers:

It may be helpful to add one or two examples of what constitutes "special value"; this seems a bit ambiguous, and having clearer expectations may be useful.

(4) The existing version of SOD 301 (6/12/2006) that the draft policy statement would replace was obviously a product of its time and addressed in detail a number of variations for application, especially relevant for that time of transition. While the dust has settled for most of these situations (and such detail is now unnecessary), SOD 301 did have in it a fundamental policy statement that emerged from this transition; specifically: "As a result, GPO acknowledges a concomitant responsibility for permanent public access to a comprehensive collection of digital content to provide access to users wherever they may be and whenever they require the information." If the purpose of the new policy statement is focused exclusively on print distribution, then it may not need to retain the statement regarding permanent public access for digital content. But this commitment (and the associated responsibilities and policy implications) should continue to be memorialized somewhere (perhaps it is already in another SOD-PPS?).

Overall, I applaud the direction the FDLP is taking and support its continued efforts to become a reliable and trusted source for digital (and other) government information.

The FDLP and GPO need to advocate for affordable internet access for impoverished residents of our poorest states, like Mississippi. With subsidized internet that began during Covid-19 expiring, we have residents who can no longer afford such access. This makes it harder to reach them, and harder to provide them with the information they need. Inflation only adds to this problem.

Looks good

In general, I like the policy. However, I am concerned about the lack of clarity ensuring underserved populations and unique communities have access to government information in the format they need, not just digital. Given the increase in natural and man-made disasters and the over-reliance on artificial intelligence where hallucinations are increasing, I have concerns that those with least ability to access government information digitally will be left out. It is these citizens that we need to strive to include.

"The Superintendent of Documents has the authority to determine which in-scope Government public information is distributed through the FDLP, in what format, and the quantity." Would it be helpful to add a citation here so readers can understand the source of that authority?

"At a minimum, each National Collection Service Area will receive at least one copy of all distributed print publications." Would it be helpful to add here, either in the body or a footnote, about how these print copies will be preserved? It seems to me that a lot of the questions about the transition away from print have had to do with the fact that we know how to preserve paper for hundreds of years, and to me that's part of the rationale for the minimum number of tangible copies. So I wondered if it would be helpful to add a cross-reference here addressing that concern – maybe that's a mention of SOD-PPS 2016-4, or whatever source you feel best addresses that.

Define National Collection in this document. We have heard before about print on demand being an option to replace lost or damaged print copies. If that is still considered a realistic option, can it be included here?

N/A

N/A

N/A

N/A

Closed Request for Comment Record

<https://www.fdlp.gov/about/closed-request-for-comments>

TOPIC: Print distribution and digital dissemination of information to Federal depository libraries

PROPOSAL: Print Distribution and Access to Government Publications in a Digital Federal Depository Library Program ([SOD-PPS-7-2025](#))

SUPERSEDES: [Dissemination/Distribution Policy for the Federal Depository Library Program](#) (SOD 301, effective 11/28/2006)

COMMENTS: Comment Period Closed

DEADLINE: By January 18, 2025

NOTICE: News Alert: [Request for Comments: Draft Policy on FDLP Distribution](#) (11/13/2024)

NOTICE: News Alert: [Submit Comments by January 18: Draft Policy on FDLP Distribution](#) (01/13/2025)

NOTE: This record will be updated to include links to the signed version of the revised policy and to this report.