



**ASSOCIATION OF SOUTHEASTERN RESEARCH LIBRARIES**

March 27, 2026

Scott Matheson Superintendent of Documents  
U.S. Government Publishing Office  
732 North Capitol Street, NW  
Washington, DC 20401

Dear Superintendent of Documents Matheson:

The Association of Southeastern Research Libraries (ASERL) has long held an active interest in the workings of the Federal Depository Library Program (FDLP). Our Collaborative Federal Depository Program (CFDP) has been awarded for its innovative approach to coordinating activities among FDLP libraries in our region and has supported significant growth in the size, scope, and strength of tangible FDLP collections in our member libraries and elsewhere. ASERL believes that ensuring stable, permanent public access to our government's information is critical for a healthy democracy, and these collections and services represent massive long-term investments by our members in furtherance of that belief. We appreciate the opportunity to comment on the draft public policy statement regarding Permanent Public Access to U.S. Government Public Information through Preservation.

On the surface, the new draft policy seems flexible and simple enough, but the lack of specificity raises red flags for some of our documents librarians. It has been many of our members' experience that a lack of specificity in policies like this can lead to inconsistent, widely varying interpretations by GPO officials over time as to how the policies are to be implemented, frequently at the expense of the depository library.

Moreover, the draft policy states both that the responsibility for preserving public access is the responsibility of the GPO, and that "GPO does not have a collection and relies on partners" and "libraries will preserve tangible content." Aside from the lack of specificity mentioned above, we find these statements read like top-down commands rather than a mutually beneficial and shared responsibility among so-called partners. FDLP libraries undertake the responsibility and costs for maintaining these collections on their own, with

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no remuneration from the federal government. Open-ended, unfunded mandates such as this are not sustainable and risk driving FDLP libraries from the program due to very real concerns about unknown costs and requirements.

We would prefer to see clearly delineated expectations for both the GPO and the FDLP libraries, and engagement with the depository libraries—particularly the regional depositories—as partners in this preservation endeavor who need support to execute the GPO’s goals. We value the work of the GPO and hope that a more clearly defined document will ensure success for both the office and the libraries who partner with it.

We appreciate the opportunity to comment on this important matter. Thank you for your consideration.

Kind regards,

A handwritten signature in blue ink, appearing to read "John Burger". The signature is fluid and cursive, with a large initial "J" and "B".

John Burger, Executive Director  
Association of Southeastern Research Libraries

cc: Cynthia Etkin, GPO