

## **Council's Comments on the Draft Decision Framework for Federal Document Repositories**

Council believes this report is a reasonable initial public draft for an assurance and decision framework for developing a system of regional repositories for tangible federal government documents. As Council understands from this draft and other planning discussions, the tangible federal government document system would tentatively be based on two dark archives (highest assurance level), a larger number of "light archives," and designated depository libraries (lowest assurance level). Council generally supports this proposed configuration of dark and light archives as a reasonable strategy for providing preservation of the tangible FDLP collection, and as a backup for operational depository library collections.

Council includes several suggestions and questions below that we recommend be clarified in the final version.

### **Light archives:**

- It is not clear where light archives fall within the spectrum ranging from operating library to dark archive, e.g., whether they are more akin to archives or to operating libraries?
- Is the intent of light archives that they be used only in the event that efforts to locate items in operating depository libraries have been exhausted?
- Will materials held in light archives be available for physical use by researchers, or will only digital surrogates be made available?
- Other than staff, will there be "authenticated constituents" who have access to use light archive materials? Who? Why?
- Will light archives require reading rooms, or will researchers rather be directed to their local depository libraries to use digital surrogates delivered thereto?
- Should library consortiums be more likely candidates for governing light archives than individual institutions?
- Are collections in light archives "depository" collections, or are they a new intermediary status somewhere between archival (NARA affiliation) and depository (FDLP) collections? Will a new status require statutory definition?
- Would light archive materials circulate at all, even to branches within the parent institution?
- With the addition of some provision for on-site, limited use of materials, is it possible that certain "high end" existing depository library remote storage facilities might be converted to light archives?

## Specific Factors in Draft Assurance and Decision Framework:

In general, the "low" end of assurance is not adequate for any sort of archival facility. The low end is much more indicative of the current environment in many depository libraries. However, in the criteria for accessibility the "low" level of assurance (gov docs do not circulate) actually gives a higher level of confidence in the archival nature of the repository than the "high" level of assurance (unrestricted circulation). This confusion should be cleared up.

- **Disclosure of Holdings**  
Cataloging/Metadata Production - Every depository library is required to comply with the highest level of assurance (piece level holdings). It seems that the low level of assurance for this category - published GPO catalogs only - is setting the bar too low.
- **Ongoing Validation/Inventory**  
This seems to assume a SuDoc arrangement of the repository. See under "Storage and Integration" that this might not be the ideal arrangement for an archival collection.
- **Storage and Integration**  
*Integration of Government Publication Collections*  
This should not *assume* that a SuDoc arrangement of materials in a repository is the best arrangement for an archival collection.
- **Proximity to Users**  
The term "off-site" assumes that there is no public access at the storage facility itself. Many archival facilities make some provision for public reading space. A high assurance level might be "stored off-site and available only in surrogate copy."
- **Physical Markings and Bibliographic Identifiers**  
An RFID tag might not represent the highest level of assurance for an archival system which is designed to withstand a nuclear attack or other massive catastrophe.
- **User Assistance**  
Would there be on-site users in the dark archive?
- **Accessibility - Access to Originals**  
As stated above it appears that the high through low rankings are reversed in this section, by definition archival facilities restrict access to originals, whether on site, or via circulation or ILL. It should be made clear that a good archival repository should have a "low" assurance level on some of these measures.  
On site - The inclusion of the "medium" level – restricting who has access – is unacceptable since we are dealing with public information.  
Would any access be available, even by appointment, for use of dark archive materials?
- **Access to Reproductions – Digital**  
What is meant in the middle category by the use of the word subscription in "digital surrogates or copies on the Web delivery on a subscription basis.?"

- **Governance**

Is state or federal funding and governance necessarily more stable than well established, well funded private institution or university?