



ASSOCIATION OF RESEARCH LIBRARIES

June 5, 2007

Mr. Richard Davis
Acting Superintendent of Documents
U.S. Government Printing Office
732 North Capitol Street, N.W.
Washington, D.C. 20401

Ms. Cynthia Etkin
Program Planning Specialist
Office of the Superintendent of Documents
U.S. Government Printing Office
732 North Capitol Street, N.W.
Washington, D.C. 20401

Dear Mr. Davis and Ms. Etkin,

I am writing on behalf of the Association of Research Libraries (ARL) to reiterate ARL's strong support for the draft *Guidelines, Establishing Shared Regional Depository Libraries*. ARL commends GPO for drafting these *Guidelines* as they provide regional Federal Depository Libraries (FDLs) and their selective colleague institutions with flexible and useful guidance in developing additional models of access to government information. The draft *Guidelines* will be an important factor in ensuring that libraries can respond to the changing environment thus determining the strength and effectiveness of the Federal Depository Library Program (FDLP) in the future.

The purpose of the draft *Guidelines* is to allow regional and selective FDLs to explore and implement new innovative approaches that take advantage of the digital environment. The Depository Library Act of 1962 established the authority for regional FDLs. Library and information services have changed dramatically since that time. The introduction of digital technologies, the World Wide Web, and the Internet have transformed all sectors of society, including libraries. The digital networked environment presents opportunities to introduce new services and enhance existing programs such as the FDLP. Indeed, one of the goals of the *Guidelines* is to improve or, at a minimum, maintain services to the public that these regional FDLs have provided for many years.

The draft *Guidelines* were developed based on the successful discussions between the University of Kansas and the University of Nebraska-Lincoln. There also was consultation with the library community. As ARL, the American Library Association, the American Association of Law Libraries, and the Special Libraries Association acknowledged in their letter of support for the University of Kansas and University of Nebraska-Lincoln shared regional, "the online information environment and

technological innovations that allow rapid data transfer provide opportunities for new models of cooperation and delivery of materials and services that know no state boundaries." I attach the letter from these associations. It is important to note that the draft *Guidelines*, with one additional factor, mirror what the associations endorsed in 2006.

Twenty-three of the 52 regional FDLs are members of ARL. As a consequence, ARL and its members have extensive knowledge and experience in regional and selective federal depository library issues.

I understand that some concerns have been expressed with regards to the draft *Guidelines*. It appears that most of those concerns stem from inaccurate information or a misunderstanding of how regional FDLs operate. As none of those raising concerns are associated with or are responsible for a regional FDL, it is understandable that there could be confusion. I address some of those inaccuracies below.

There are 52 regional depositories in 43 states. Currently, there are 7 states, 5 territories, and the District of Columbia that do not have a regional depository. A significant number of selective FDLs are supported by out-of-state regional FDLs. For example, the University of Maryland supports 63 selective FDLs in Maryland, Delaware and the District of Columbia. Thus the statement that "many selective depository librarians expressed the importance of having a regional library in their state" does not reflect the history or current status of the program. Moreover, section 1912, chapter 19, Title 44 does not specify that there be regional FDLs in every state. Section 1912 refers to "within the region served," and that there be *no more* than two regional FDLs per state.

Resource sharing programs, sharing of expertise, and cooperative efforts are the hallmark of the library community. Members of the FDLP have participated in in-state and multi-state cooperative initiatives for many years. For example, the first shared regional was established in 1968 with others following in 1988. This long and successful history of shared regional FDLs permits other institutions to build on these relationships. In addition, eight regional FDLs serve multiple states and territories. The call for "a pilot from which real experience could be drawn," suggests that those concerned either do not know that there are several shared regional FDLs or chose to ignore the 39 years of experience with shared regional FDLs. This extensive experience presents valuable information and working models for other institutions exploring the shared regional concept.

Each participating depository library, either selective or regional, reflects local, state, and/or regional interests. As a consequence, any guidance provided by GPO must be flexible to be pertinent to the diversity of these interests and to spur new innovative service approaches. Thus a "one size fits all" approach where the elements of the draft *Guidelines* would become a "requirement" would be inappropriate as each library must

be able to respond to the changing environment on behalf of its users. As you may be aware, the library community has a long history of opposing guidelines that place requirements on institutions.

The draft *Guidelines* note the importance of communication as an essential element if these discussions are to succeed. As the process with the University of Kansas and University of Nebraska-Lincoln demonstrated, with good communication, all stakeholders agreed to the proposed shared regional. As is standard practice at all institutions, because the Memorandum of Understanding (MOU) is a legally binding instrument, only the library director or academic leadership have the authority to obligate the institution to new and/or changed responsibilities. For example, the Vice Chancellor for Academic Affairs was a signatory for the University of Nebraska-Lincoln in the MOU with the University of Kansas. There are opportunities for others such as documents staff to acknowledge their participation in the process prior to academic leadership (or state authority as appropriate) signing the MOU.

It has been proposed that the Joint Committee on Printing review and approve each shared regional FDL. With the draft *Guidelines* in place, the value of such an undertaking is far from clear. If the institutions work from the *Guidelines*, have the support of the library authorities in their region, and their Senators, it would be helpful to understand what additional review by the Joint Committee on Printing would provide to this process.

Finally, a recent GPO Biennial Survey found that only 18% of FDLs "download, store and make online publications accessible via local servers though most download between 1 and 25 files" per year. This data demonstrates that the proposal to "address how online collections may or may not affect tangible collections," does not reflect current practice in FDLs. The majority of institutions link to online resources or access them as needed. Accessing electronic government information is vastly different than how FDLs manage print resources. Government information available via the FDLP is now overwhelmingly electronic thus it is not clear why many of the concerns focus on print resources.

Please let me know if there is additional information that I can provide to ensure a strong and robust federal depository library program in the future. I very much appreciate the opportunity to comment on the draft *Guidelines*.

Sincerely,

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

Prudence S. Adler
Associate Executive Director
Association of Research Libraries