

The following document contains the text of Ithaka S+R's fdlpmodeling project "findings" draft document [<http://fdlpmodeling.net/?p=40>], interspersed with comments provided by FGI volunteers. FGI comments are indented and highlighted in yellow.

--Your friendly FGI volunteers (Daniel Cornwall, James Jacobs, Jim Jacobs)

Modeling a Sustainable Future for the Federal Depository Library Program in the 21st Century: Findings (DRAFT 1/14/11)

Note: Ithaka S+R has been commissioned by the Government Printing Office (GPO) to analyze the Federal Depository Library Program (FDLP) and recommend a sustainable and practical model or models, consistent with its existing vision and mission, for its future. This document provides a draft of the section summarizing our research-based Findings that, subject to further substantive revision and copy-editing, will be incorporated into the final report.

This document is a summary of findings drawn from the drafts of the Background, Environmental Scan, and Existing Library Networks sections (and comments provided and revisions planned subsequently). For references, details, and further information, please consult the drafts of these sections which may be found at <http://fdlpmodeling.net>. We will welcome the reader's reactions to help us bolster the objectivity and accuracy of this document.

For more project background or to provide comments, please visit <http://fdlpmodeling.net> or email the project team at fdlpmodeling@ithaka.org. Reactions provided by January 24, 2011 will be especially helpful in our preparations of the Direction and the Models that will result from it, so we will be most grateful for your immediate review. In addition, we expect that any further comments made before February 15, 2011, can be accommodated in the final report.

Modeling a Sustainable Future for the Federal Depository Library Program in the 21st Century: Findings Ithaka S+R Public Draft for Comment 1/14/2011

Please direct all feedback to fdlpmodeling.net or fdlp-modeling@ithaka.org 2
Based on the previously completed Background, Environmental Scan, and Existing Networks sections, we have compiled key findings that we see being especially important in modeling a sustainable future for the Federal Depository Library Program in the 21st century. This brief section compiles these findings, structured into three broad categories: functional considerations with respect to collections and formats, functional considerations with respect to services, and structural considerations with respect to the network of libraries. It also provides an implication for each finding, as well as an overall implication for each category, that will help shape the Direction and Models that will be delivered later during the course of the project.

Collections and Formats

Finding 1: Users increasingly prefer to access many types of collections in electronic form, although tangible collections remain important in supporting access needs

- Digital and digitized materials are becoming the format of choice for a growing share of user needs, for government information as well as more broadly.
- Although widespread, this transition has been felt differently across different user communities, with significant concerns remaining that digital materials do not equally well serve the needs of all user communities.
- In the absence of digital versions, print collections remain important for access purposes.

- Even following digital availability, some access needs may be best met through print, due to the preferences and needs of the user.

Implication: The Program should continue to emphasize, and come to further emphasize, the new avenue for increasing access provided by digital versions. But, because it will be some time if ever before all needs for all content types are met through digital/digitized versions, the ongoing role played by tangible versions in supporting access needs must not be overlooked.

This implication overlooks (and perhaps underestimates) some of the challenges of digitization. Specifically, take the example of statistical publications, which consist of tables of numeric information. These comprise an enormous and important segment of print collections. The original paper copies of these will continue to be more valuable and accurate than digitized copies unless the numeric information can be guaranteed to be accurately scanned, human-legible, and OCR'd accurately. Such guarantees are still rare given the difficult and expensive process of digitizing such publications. (OCR'd text is too often found unusable or unreliable and double/triple keying is the norm (see Julie Linden's d-lib article <http://www.dlib.org/dlib/january06/linden/01linden.html>) (Although this article is from 2005, the outcomes/conclusions remain valid). The real advantage of digital access to statistical publications will come when we achieve the ability to guarantee accuracy of digitization and create techniques that enable users to manipulate, query, and analyze the statistical information in these publications.

Finding 2: Born digital versions of new FDLP materials are widely available, and digitized versions of historic FDLP materials will increasingly become widely available

- Virtually all new federal publications are freely available online and are incorporated into the FDLP through FDsys or various interagency partnership agreements.
- Digitization of the historic collection is proceeding steadily through a variety of initiatives, including formal GPO partnerships with a variety of libraries.
- Google's digitization partnership with Committee on Institutional Cooperation (CIC) libraries has been the largest scale digitization effort to date, making a large number of government documents freely available through HathiTrust.
- Based on today's estimates, it seems that the lion's share of historic collection will be digitized and freely available in digital form within 5-10 years
- Many of these projects will result in digitized collections being ingested by GPO into its FDsys platform.

Implication: The Program should anticipate the eventual relatively comprehensive digitization of historic collections to accompany its nearly comprehensive born-digital collections, and GPO should continue and enhance its work to bring digitization outputs into the formal structure of the Program alongside born-digital materials; these activities will dramatically increase the accessibility of FDLP materials by the American public.

Although this implication accurately reflects the trend toward more information being available digitally, it omits mentioning trends that will limit or restrict information from being digital or included in Title 44/FDLP-defined content. These include an increasing volume of "fugitive" information (as more and more agencies publish outside the FDLP/GPO structure) and statistical resources (as noted above).

In addition, there is a question, which neither the draft *Background report* nor the draft *Environmental Scan* adequately address, of other difficult-to-scan publications. These include items printed on paper that is now brittle, publications that are in odd shapes and large formats, and the many titles that are bound together in single volumes without adequate metadata. It is far from clear from either the Ithaca S+R reports or from our own experience that the "lion's share" of print will be digitized, adequately described, and

usable in even 5-10 years. We would estimate, based on experience in digitizing at Stanford, that 25% - 30% of historic collections will be digitized in this period from the Google/CIC project. More will be digitized by individual libraries or groups of libraries based on community need/agency/subject (see GPO registry <http://registry.fdlp.gov/>). While we certainly should plan for a great deal more information being available digitally, we should not overestimate the comprehensiveness of the digital conversion.

It is also worth noting that the CIC Google process is destructive of the volumes it scans and not scanned at preservation quality (even Google admits as much). The implication should include the need for careful planning of preservation of print copies.

Finally, as written, this implication is too vague to be useful. It could be more useful if it defined what it means by "the formal structure of the program" and what it means for information to be "available" and "accessible." An adequate vision of the future of the FDLP must include long-term preservation, guarantees of no imposition of fees, and usability in addition to mere "availability" and "accessibility."

Finding 3: Many libraries are moving away from a "just in case" model of proactively collecting and holding tangible collections locally in case of need

- Many libraries are seeking to free up space occupied by collections storage to be used for other purposes, and see digitization as providing an important opportunity to do so.
- Even some of the largest research libraries are migrating print collections – especially serial collections also available digitally – away from local storage and towards consortially-managed shared print provision, allowing them to free up space for additional collecting or for other purposes while maintaining access to and preservation of print originals.
- Many libraries that do not consider themselves to be research libraries are taking their role as "working collections" more seriously, in some cases prioritizing patron-driven acquisitions of local print collections.
- Much library community emphasis, especially among research libraries, has begun to turn towards distinctive local collections and locally provided user services, including the acquisition, digitization, cataloging, and support of the use of special collections, data curation, and similarly locally focused undertakings.
- In many cases, these changes are the result of strategic decisions made by the library that began with scholarly journals, which are now proceeding to impact other collection types.

This above point glosses over an essential point that should be given more prominence in the findings and consideration in the implications and planning. This point is that library budgets are being affected by the financial problems of the nation. This is resulting in libraries making decisions that are driven by dire budgetary restrictions rather than by mission-driven strategies. The above point is, therefore, not accurate. It is far from clear that the decisions to abandon print collections were driven by mission and it is much more likely that these were tactical decisions to cope with inadequate budgets. The report should, in fairness, note that Portico and JStor have directly benefited from these decisions and that they have also had an impact on library decision-making.

- Tangible collections are a declining source of value to many FDLs, and, in recent years, many libraries have already begun a reassessment of FDLP tangible collections, resulting in significant de-accessions (and in some cases library departures), notwithstanding what has thus far been relatively modest levels of digitization.
- If Regional FDLs continue to drop their status, it will call into question the long-term sustainability of the tangible preservation and access backstop of the Program, and if Selective FDLs continue to withdraw tangible holdings, it will reduce an additional source of implicit preservation assurance for the Program as well as diminishing access to materials not available digitally.

The above point mischaracterizes both the current situation and the role of the FDLP. First, it should note that selective depository libraries seem to be withdrawing only **some** print holdings and are doing so most often only when they have free access to digital equivalents. There is no evidence that there are wholesale withdrawals of print that precede free digital availability of their equivalents. It should be noted that commercial alternatives (such as LexisNexis -- now Proquest -- Congressional) remain cost prohibitive for many libraries and sole reliance on them for categories of government information should be rejected as an alternative to free availability of government information

Second, referring to the Program as a “backstop” for preservation ignores the fact that, until recently, the Program has been the **only** institution of preservation for whole classes of government information. This preservation is not “implicit,” it is explicit in the mission of the FDLP.

Implication: FDLP materials will not be immune from many libraries’ large-scale strategic reassessment of both tangible acquisitions and collections management, and, as digital availability expands, the Program’s structure will need to accommodate changing library strategies for tangible collections while continuing to support access to needed materials.

As noted above, many of the decisions libraries are making today are not strategic, mission-based, but are a tactical way of coping with inadequate budgets.

This finding does not explain or provide any justification for separating so called tangible collections from digital collections in its analysis. By equating “collections” only with “tangible collections,” it ignores the opportunities that could be brought to libraries and their communities by their building of digital collections. Why does the report not suggest that “The Program’s structure will need to accommodate changing library strategies for digital and print collections”? Why does this finding envision “supporting access” as somehow different than and perhaps in conflict with collection strategies? These are errors in judgment and reasoning. The report contains a fatal error by suggesting that the only options for FDLP libraries are either “tangible collections” or “access.”

It is essential in a project that is supposed to provide a vision for the future that current trends are evaluated as to their usefulness, their productivity, their sustainability and not merely accepted as a given path to the future. The implications above neither question nor evaluate these trends. Neither do these implications offer a mission-driven alternative strategy. Instead, this implication offers a vague imperative to “accommodate” the future to current tactics.

This finding should ask how these tactics are working and if they work for all libraries equally well? It should offer a vision of the future not a simple reaction to an existing environment. While it must take into account existing budgetary constraints, it should also anticipate how policies will affect future budgets. (Will, for example, reducing collections encourage additional funding or will it encourage further reductions?)

An alternative and more open vision would avoid conflating the need to regain physical space with whether or not libraries have abandoned collections. As non-governmental information becomes increasingly available through open-access distribution and through the use of creative commons (and similar open-access) licenses (for example, <http://www.nature.com/srep/marketing/index.html>), libraries will have fewer barriers to building local digital collections. GPO could play a leadership role by facilitating the building of local collections, providing expertise and experience in doing so, and providing a real model for the future of libraries. Sadly, this finding is completely silent on this possibility.

This finding actually confuses rather than clarifies the opportunities that the digital age brings to libraries. The report accepts the old cliché of “just in time vs. just in case.” (One might well ask about this strategy: what are the long-term implications of using a manufacturing model for memory institutions?) By accepting this cliché, the report promotes a future in which libraries can rely on someone else to preserve and provide access to information without addressing who other than libraries will take on this responsibility. By accepting the “just in time” model as adequate, this finding errs drastically because it overlooks the need to identify those institutions that will provide “access” to those that have no collections. “Access” is not an alternative to “ownership” in the digital future of libraries. For libraries to have a future, they need to accept the responsibility to preserve collections for their user communities. Libraries cannot *ensure* access “just in time” – or ever -- unless they have actual control over the content. This finding makes a fatal error by failing to acknowledge the undeniable truth of the digital age: that access cannot be provided without preservation and preservation cannot be accomplished without physical control, i.e., by building digital collections. Ithaka S+R surely knows this as her sister organizations JStor and Portico have a business model built on this fact. The key question readers of this report must ask is if they wish to leave the decisions about what gets preserved, who gets access, when information is withdrawn or altered, and when fees are imposed to others or accept the responsibility themselves.

A more accurate finding of the Environmental Scan would say that libraries are combining “just in case” with “just in time” methods and are building digital as well as print collections. The report should recognize this and provide a more flexible finding with regard to the future of FDLP collections.

Finding 4: Organizing an appropriate investment in digital preservation and integrity will require new approaches

- GPO will continue to invest in the preservation qualities of FDsys and future platforms, which provides the community with basic assurance of the long-term preservation of the materials hosted by GPO.

The above point is not supported by Ithaka S+R’s reports. Although GPO may intend to invest in FDsys, there are no Congressional guarantees that it will be able to do so adequately to assure the community of long-term preservation. As noted above, dire budgets are the context within which we must plan. GPO’s budget is no more immune to cuts and short-falls than is the budget of any individual FDLP library. There is, therefore, a danger of relying only on GPO for all preservation of everything – especially given the current climate in Washington DC to drastically reduce the size and scope of the Federal budget!

A more accurate finding would recall GPO's 3-week long purl server outage last summer (<http://freegovinfo.info/node/2704>) and would investigate options that could have minimized the effect of such outages. (That outage could have been solved in a matter of hours rather than 3+ weeks if a distributed preservation network had been in place.) This point would be more accurate to note that a distributed preservation network would be more reliable and be able to more confidently provide near 100% uptime than a single-source (FDsys) solution could ever provide.

- GPO cannot on its own serve as the single trusted party to ensure the preservation and integrity of the digital and digitized FDLP collections.

This point is accurate, but it contradicts the point that precedes it. (See above comment).

- While GPO has made FDLP collections bulk downloadable through FDSys and added LOCKSS permissions statements to FDSys, no role has been formalized in the Program structure to incorporate library interest, in some cases individually and in other cases collaboratively, in hosting copies of these collections to support their long-term preservation and integrity.

The above point contains several errors that lead to incorrect conclusions. It makes an error about the current preservation environment and fails to draw accurate conclusions about the possibilities for the future of FDLP preservation.

It is a mischaracterization to say that LOCKSS is merely “hosting copies” and saying so diminishes the accomplishments of the USDOCS project. LOCKSS-participating libraries are collecting, curating, and preserving content; LOCKSS-participating libraries also have the option to deliver content to readers. This clearly “incorporates library interests.” This is a formal arrangement, with GPO as a LOCKSS alliance member actively facilitating USDOCS. The LOCKSS project is specifically designed to support long-term preservation and information integrity.

This point also omits that LOCKSS-USDOCS is expanding with 33 libraries participating – including 10 regional libraries.

Implication: Digital and digitized collections must be held outside the control of the Federal government to provide a credible system for preservation and integrity of FDLP collections, and new models and incentives will be required to provision this need.

This implication is true in its conclusion that “Digital and digitized collections must be held outside the control of the Federal government to provide a credible system for preservation and integrity” but too vague to be useful in its suggestion that “new models and incentives will be required.”

What is meant here by “new approaches” and what makes these undefined approaches “necessary?” This part of the conclusion is also unsubstantiated because it doesn’t make a link between what is being done with LOCKSS-USDOCS and what could or should be done differently. There surely are other things that could and perhaps should be done. But the finding doesn’t say either why or what they are.

In fact, one could argue that the FDLP model of distributed collections adequately fulfills the need to have content held outside of the Federal Government in systems that are tamper evident.

It should also be noted that while GPO has only made a few collections bulk accessible/downloadable, the entire FDSys site is LOCKSS-compliant. As new collections are created in FDSys, they will automatically be included in LOCKSS-USDOCS.

This finding is particularly troubling because it appears to attempt (without justification or evidence) to deprecate an existing distributed model that is working, expanding, and that builds on the time-proven tenets of the FDLP model.

Finding 5: Many libraries invest little in locally held and managed general collections in digital format

- Most libraries license digital collections of journals and books from centralized service providers to support their users’ access needs to content.

The above point does not address whether or not libraries prefer to license access or if they have no choice but to license access. It does not address the long-term implications for libraries and the public for this shift from first-sale to licensing.

- The preservation and integrity of centrally provided digital collections is provisioned in some cases on a centralized basis and in other cases on a decentralized basis.
- A minority view holds that locally held and managed general collections in electronic format are imperative to service provision and the assurance of preservation and integrity. Still, bespoke digital services built atop locally loaded digital general collections are only known to be made available through a small number of research libraries and consortia.

The Ithaka S+R reports do not provide evidence to support the conclusion in the above point that one view is a “minority” view in the community. Even if Ithaka S+R has additional information that they have not yet shared, it is surely not justifiable to characterize the views of a large, diverse community without surveying that community for its views. Our understanding is that Ithaka S+R based its reports largely on a literature review and not on a survey of the community.

We do have some limited evidence of the community’s view on digital deposit, however. The FDLP biennial surveys have asked questions that, though not definitive because of confusing definitions and inconsistent wording, tell us that, even without a mechanism in place for digital deposit and even in an era when GPO was hostile to digital deposit, a large and growing number of depository libraries were and continue to be interested in “digital deposit” or building local digital collections (whether LOCKSS-based or otherwise). In 2005, 229 libraries were already storing and serving federal electronic documents locally and 334 libraries were willing to take at least some federal electronic documents without knowing what the distribution mechanism might be. In 2007, 453 libraries said they would accept digitally deposited PDF files. The report would more accurately reflect the views of the community by recognizing that – even without specific procedures defined, more than a third of FDLP libraries expressed a strong interest in digital collections. Defining this merely as a “minority view” is not a useful characterization of even the current state of affairs.

The statement that digital services built upon digital collections are only being made available “through a small number of research libraries and consortia” is inaccurate. The most successful (and apparently sustainable) digital services are those built upon digital collections. (See <http://freegovinfo.info/node/3156> for examples.) The report probably meant to say that few *libraries* are providing digital services built on top of digital collections. To the extent that this is true (and it is not clear from the evidence provided in the report that it is), it should be irrelevant in a report such as this. As we have said above, the report should be envisioning a sustainable, mission-driven future, not simply suggesting that whatever is happening now is necessarily the best model for the future.

Perhaps a more accurate and better finding would be: “Some libraries choose to locally hold and preserve general collections so they are (a) continuing to build collections and fulfill their role as memory organizations; and (b) not affected by the ever changing business and pricing models of both publishers and third party archiving services.”

In addition, most libraries are leveraging web services and open URL resolvers to meet their reader’s needs. These tools work independently of where the content is located.

Implication: A robust and flexible infrastructure and associated Program structure and participation requirements should empower those libraries wishing to do so to hold and preserve digital collections locally while allowing other libraries the ability to provide outstanding services without holding digital collections locally.

This implication is accurate and useful in promoting a flexible approach.

Finding 5, which implies that the current way of doing things should dictate how we do

things in the future, does seem, however, to contradict Finding 4, which says current models are not working.

It is not clear, however, what the justification is for flexibility including libraries that have no digital collections at all. Although this might be a useful model, neither the findings nor the background documents explain how or why. Without more details this aspect of this implication is too vague to be useful. What would make this a useful criterion for being an FDLP library? If a library has no collection, but only has the same access to collections held by others, what would differentiate it from a non-FDLP library?

It is also unclear if the report intends to set up two different kinds of libraries: one that only “holds” collections and another that “provides outstanding services.”

As noted above it is not clear how libraries without collections will be able to provide “outstanding services” when the best existing services are built on top of digital collections.

This finding does not explain or provide evidence for how “providing outstanding services” is a sustainable model that will attract and maintain users and funding.

[Finding 6]

Missing in the original draft findings document

Collections and Formats: Overall Implication

The diversity of user needs and library strategies should be recognized and supported by the Program, with flexibility for libraries to elect to either (1) hold local copies of FDLP collections, in print and/or digital form, in order to collectively ensure their integrity and preservation, or (2) to take advantage of the opportunity to provide access to and support the use of government information with a reduced emphasis on local collections.

We agree with the first point in this implication (although, curiously, it does not seem completely consistent with other conclusions in the report).

We find the second point too vague to be useful. The report does not explain or justify its assumption that “access to and support of” information can be adequately accomplished without local collections. The report suggests that services without local collections are a viable part of the future of the FDLP. We believe that local collections are an important, even essential, element to providing “outstanding services.” The report provides no evidence of their finding; so allow us to share at least one personal experience to support our view: Because Stanford hosts the GATT archive (<http://gatt.stanford.edu>) it gets quite a few reference questions/research queries about GATT/WTO and international economic systems in general. Users find the collection via Google, library research guides (at Stanford and elsewhere), Wikipedia etc but invariably need more in-depth services. Because Stanford hosts the collection and reference requests (local and online) come to the library, the Librarian in charge has learned far more about the history of GATT/WTO than he ever could have learned without those collections. Requests have also helped Stanford improve its database and make plans for expanding the collection to include GATT/WTO documents not originally part of the digitization project. From this experience we extrapolate that local collections and local services are symbiotic and that local collections spur public service. Without local collections, users will be less likely to find the services available at libraries (in person or virtual).

Services

Finding 7: Services to support the use of collections remain a unique and valuable contribution of the library

- Due to the networked environment, channel duplication, and open access, exclusive access to content is a declining source of value as users are increasingly able to access needed materials without intermediaries. Users often lack, however, skills to effectively discover, interpret, and use needed materials.
- The expertise of the library remains essential in supporting users in making effective use of collections; libraries continue to add significant value for users in discovering, interpreting, and making effective use of collections, through the development of information literacy skills, direct reference assistance, and the creation of tools to guide users in working with information. Other information service organizations have similarly emphasized the importance of tools to support use in addition to simply providing access; for example, Lexis and West curate “free” and **uncopyrightable** **[Change to Public Domain!]** government collections and add highly valued services.

The above two points contain contradictions and unsubstantiated assumptions. They claim that users are able to get what they need without intermediaries, but at the same time they claim that users lack the skills to find what they need. They say that the expertise of the library is essential, yet the Environmental Scan repeatedly reports that users are content with what they find without intermediaries. The claim that “users often lack skills to effectively discover, interpret, and use needed materials” is not supported by the previous reports.

Though this finding is emphasizing the importance of services, it neglects to recognize that the most demonstrably successful services are those (such as Lexis and West) that build their services on top of curated collections of digital information.

The phrase “exclusive access to content is a declining source of value” seems to imply that local digital collections would be “exclusive” when quite the opposite would be true in a digital FDLP.

- New innovative services are being developed across libraries and information services organizations, in areas such as data curation, text/data mining, discovery, visualization, and student instructional services, all of which will help support future user needs to make sense of the information available to them.

The report neglects to point out that most of these services are built on top of curated collections.

- Some services will continue to be best provisioned on the local level by individual FDLs, but others will benefit from scale and be provided most effectively via collaboration.

The above point is so self-evident that it hardly seems worth mentioning. Unfortunately, by mentioning it without elaboration or explanation, it is easily subject to misinterpretation or over-interpretation.

It would be more accurate to bundle this statement with an explanation of how digital collections and services fit together. For example:

To provide access and services for digital information, libraries need control of that information. Control means that a library must have sufficient access and authority and rights to digital content so that it can ensure its preservation, delivery format(s), storage locations and identifiers, and the way services for that

collection are provided. Digital collections need not be held physically onsite; they can be held and maintained consortially and cooperatively. Control is the key, not physical location (OAIster is a valuable case in point).

Similarly, service provision may be provided either by a single library or by a community of libraries working together. In either case, the service-providing organization must have sufficient control over the digital information to develop, provide, and assure access to its services.

In some cases, a single library may want to develop its own services for a given digital collection to address the needs of its own, unique designated community. In other cases, services provided collaboratively for many communities or larger communities may be best provided via collaboration (e.g., by a consortium of libraries).

- The flood of content available online only increases the importance of help using it, but while GPO has developed partnerships with certain new service providers it has insufficiently incorporated innovative services into the structure of the Program.

The above point is useful, but does not go far enough. It would be more useful to point out that it is not only the volume of information that makes a difference, but the quality and functionality of the information that makes a difference. The “difference” here is actual need users have for more services than a single institution can provide. No single institution can possibly provide all the APIs, discovery tools, computational tools, visualization tools, etc. that every user would want or need. Providing the ability to build selective collections of raw content will enable different institutions to better address the needs of their particular user communities. No one should expect GPO to provide a service that will address everyone’s need equally; GPO needs to share the responsibility with its legislatively mandated partners.

Implication: The Program must better support and encourage service innovation, both by individual libraries and by groups of them collectively, well beyond the provision of access to collections and traditional reference support.

Although we agree with the above point, we must question the implication that “traditional reference support” has not evolved. Reference services have been evolving for years to expand access and leverage digital tools. A program that better supports service innovation will be building on an existing foundation, not starting from scratch.

It is also important to note that the above implication explicitly recognizes that the “provision of access” is only the beginning of service, not an end in and of itself. This contradicts the implication in much of the rest of the report that a library providing “access” to information over which it cannot control services is adequate.

Finding 8: Available sources of support in working with government information are not able to effectively meet the needs of the American public

This finding is not supported by evidence in the report. If anything, the report shows that the American public is happy with what it is getting. The report does say that librarians do not think that information users are necessarily getting the best or right information, but this is not the same as the assertion that needs are not being met.

- Public access to government information has increased due to the free online availability of digital formats but services in support of its use have not experienced a similar expansion, and in many cases investment in dedicated services to support the government information needs of the

broad public has declined. Services remain significantly underprovided, especially but by no means exclusively for members of the general public not otherwise served as a special constituency (such as by their campus library).

It is not clear from the reports that “investment in dedicated services to support the government information needs of the broad public has declined.” Surely governments are putting new investment in e-government services. Services from a variety of agencies (e.g., BEA, BLS, Census, NARA, LoC, etc.) have increased notably over the last few years. It may well be that services have not kept up with needs, or opportunities, or that they could be better, but the report seems to want to overstate its case unnecessarily.

One rather convoluted sentence in the above point appears to claim that campus libraries are excluding the general public from services. We did not find evidence of this in the report. If it is true, it provides reason to reinforce provisions of the FDLP on public access and it provides additional reasons for libraries to define and address the needs of user communities that are not geographically based.

The above point appears to make other assertions that are not backed up by evidence in the other reports. Many FDLP libraries have digital finding aids, library blogs, and services that expand access. For example, a Google search for “average tariff levels” will find in the first few results a Stanford Library Q&A (infocenter.stanford.edu), which describes local collections and online information tools; this entry still drives user traffic to the library almost 3 years after it was initially posted. The report omits mention of such important work done by FDLP librarians.

- While many users have increased access to digital and digitized FDLP materials, these collections are not always associated with services to support their effective use, creating both opportunities and challenges in ensuring that both collections and services are available to all potential users at their point of need. Libraries continue to experiment with a variety of new models to reach users at their point of need, such as online reference help, embedding librarians in research groups or in the classroom, and more.

At many libraries, these kinds of services are already considered “traditional reference.”

- For many Americans, public libraries are the most important source of services in support of the use of government information, but due to resource constraints these libraries often face real challenges in providing such services.

Implication: The Program should better ensure that services are available to all Americans, increasing access to services in support of government information at libraries nationwide and exploring innovative ways to deliver services to users at their point of need.

Although, we agree with the above implication, it is too vague to be very useful. The report would be more useful if it suggested how these unspecified services should be provided. It would be more useful if the report made specific suggestions such as “Libraries need to develop services catered to their designated communities built on top of digital content selected, acquired, and curated by the library.”

Finding 9: Additional training and outreach is needed to ensure government information skills among specialist and non-specialist librarians

- Librarians outside of FDLs, and even non-specialist librarians within FDLs, often have extremely limited awareness and knowledge of government information; government information is often seen as the specialized purview of specialist librarians at FDLs. As a result, non-specialist librarians may not take full advantage of government information resources in working with users.

- In a rapidly changing information environment, specialist government information librarians may lack up-to-date awareness of current resources and best practices, and may benefit from additional training to maintain and develop necessary skills.

The above point seems to contradict findings 7 and 8. Perhaps, it would be more accurate to qualify all three findings to say “some libraries...”, if, indeed, some are providing essential services and others lack necessary skills.

Implication: The Program should work to raise awareness among non-specialist librarians of the value of government information, and should facilitate the development of basic government information skills among non-specialist librarians; the Program should also better coordinate and support skills development and maintenance among specialist librarians.

Raising awareness etc. among non-specialists is a worth goal. It would be helpful if the report took a firm stand on whether it supports a future in which there will be specialists or all generalists will have government information skills. We like both approaches, but recognize that there may be a need to choose one or the other in times of constrained budgets and limited staffing.

Services: Overall Implication

Dialogue about the future of the FDLP has often privileged questions of collections and their preservation over vital services in support of their use. Going forward, services to support users in discovering, accessing, interpreting, and making effective use of government information must receive equal weighting with collections in planning for the Program’s future, in terms of emphasis, incentives, and library participation, and both specialist and non-specialist librarians must be supported in developing necessary skills to effectively provide these services.

We strongly question the above conclusion that “dialogue about the future of the FDLP has often privileged questions of collections and their preservation over vital services.” If anything, the reverse is true. Where once collections took the forefront in discussions about the FDLP, in the last few years most of the literature has been advocating weeding print collections, substituting services for collections, and substituting “access” for selection and preservation.

There are some of us (the report would surely call us a “minority”) who have strongly advocated a balance of collections and services rather than a preference of one over the other. In order to give “equal weighting” to collections and services, it will be necessary to go beyond the findings of this report. Why? Because this report does not demonstrate a clear understanding of the connection between services and collections. We find it perplexing that the report misses this point so consistently since it does include the evidence for it – though it also ignores some of the evidence, blurs distinctions when it could sharpen them, and repeatedly diminishes the importance of collections as a necessary component of services.

Findings: The Network of Libraries

Finding 10: The roles of depository libraries are defined by tangible acquisitions and collections management, but new roles are vital to meeting the Program’s vision and mission in a digital environment

- Both the Selective and Regional roles are defined in Title 44 as connected to tangible collections acquisitions, retention, and management.

The above point is misleading. “Tangible” is not mentioned in Title 44, but is defined in Superintendent of Documents Policy Statement 301. Title 44 includes print and micro but

is largely silent on digital information.

- No roles are defined in the Program for the provision of print preservation, such as conservation, disaster recovery, preservation reformatting, etc.

The above is also inaccurate. Title 44 specifically defines retention requirements and the *Federal Depository Library Handbook* defines responsibilities for preservation (including reformatting), retention, and disaster recovery.

- No roles are defined in the Program for the acquisitions, management, or preservation of digital collections.

This is inaccurate as the *Handbook* also defines provisions for those digital materials that GPO has chosen to distribute (so called “Tangible Electronic Products”).

It is also irrelevant in terms of planning for the future unless the only models under consideration will be identical to what already exists.

- Although a key element of the Program’s mission is the provision of “Expert assistance rendered by trained professionals in a network of libraries,” no roles are defined in the Program around the provision of services.

This is inaccurate. Services are extensively defined in the *Handbook*.

- Existing and potential FDLs have demonstrated ample interest in claiming these roles, even while some are decreasingly interested in the tangible collections that are currently at the heart of the Program.

This is a confusing point. Are “tangible collections... at the heart of the program” when so little is “tangible”? This only makes sense if one describes “the Program” as the old GPO-centric view in which the role of libraries has been reduced from central to peripheral. Is this relevant to the future of the program? If so, how?

It is not clear what significance the report is ascribing here to the decreasing interest in “tangible collections.”

Implication: Defined roles must support the full range of Program priorities and durably accommodate participant interests, recognizing that libraries value roles and responsibilities differently.

The flexibility of this implication and the recognition of a range of priorities and participant interests is valuable. This implication would be stronger, however, if it also described the essential goals and missions of the Program. It would be easy to read some of this report as an attempt to maintain the Program rather than maintain the values and mission of the program. It is the values and mission that are essential. The Program can provide a useful, existing mechanism for ensuring long-term, free, public access to all government information. The report should not attempt to save the Program if it means losing sight of the mission.

Finding 11: The state-based multi-faceted Regional role is not uniformly sustainable

- The essentially state-organized Regional role does not accommodate the tremendous variation in state size and population, and the challenges in collaborating across state lines in provisioning this role have reduced its sustainability.
- The combination of retaining large-scale collections and providing supporting and coordinating services to their state can make for an awkward combination for some Regional libraries. State

library agencies and county library systems coordinate library services and sometimes provide sharing and trust networks for public libraries, but they can only sometimes assume the full Regional role. Research universities hold large tangible collections, but not all are well positioned to fully embrace the coordinating aspects of the Regional role.

- In some states, the Regional role is strong and its requirements are provisioned effectively; in other states it has been difficult (and sometimes impossible) to provide effective Regional collections and/or coordination.

Implication: Mounting pressures on the Regional role indicate that the role itself should be reexamined to better align with library abilities, and that the performance of this role may be able to be organized more creatively, including through collaborative efforts.

The implication focuses too much on the existing regionals and the existing role for regionals. The goal of modeling a future for FDLP should not be to maintain the structure that exists if it does not further the goal and missions of the program. Surely the concept of some libraries having “selective” responsibility and other libraries assuming a larger, more cooperative role with a broader mandate fits in very well with digital information dissemination and use. We should be looking at the regionals as they currently exist to provide a possible foundation for that latter role, not a barrier to progress. We should also recognize that the roles and responsibilities of selectives and regionals are and probably should continue to be different. We should not be looking to a model that will save one at the expense of the other. Roles should be defined by what regionals SHOULD do, not what they CAN do. We need to start with a vision for the future, not a description of the past, and then work on how to attain our vision.

It is important to recognize the overall growth of FDLs since 1962. (see page 6 of the Background report.)

1962 - 509 depository libraries
1972 - 1080 depositories (inc 41 regionals)
2010 - 1224 depositories (49 regionals)

Finding 12: The Program’s organizational structure is weakened by its inability to leverage the strongest trust networks

- Libraries and their parent organizations have developed numerous trust networks that provide vehicles for collaboration.
- Some of these trust networks are sufficiently durable to serve as preservation bulwarks, while others may be best suited for service provision, digitization, and other types of roles.
- While many libraries, especially academic libraries, are members of such trust networks, other libraries continue to operate on a largely individual basis.
- The Program works only with individual libraries and has no ability to formally incorporate library trust networks and other types of collaborations into its organizational structure (although GPO has gone out of its way to provide other mechanisms to recognize and support their contributions).
- Advances in collection management and preservation, especially following digitization, reduce the need for local or geographically proximate print collections, and support the development of innovative strategies for collaboration.

Implication: The Program should find ways to embrace the strongest networks, including those that are not geographically organized, that can advance its mission.

It is not clear that the organization lacks the ability to “leverage trust networks.” Although the program may be designed to work with individual libraries, the regional structure, the use of interlibrary loan, the ability to share bibliographic records, and so forth all seem essential parts of the program built on country-wide trust networks.

We agree that geography is no longer a limiting or defining feature of the program. FDLP already uses conferences, listservs, and the internet to go beyond geographical limitations.

The most important single recommendation that the report should have made, but did not, fits in here. Libraries should be working to examine and re-examine their user communities and define them without the hindrance of geography. Although some libraries will choose to be geographically focused, others will find it liberating to focus on larger geographical regions than was possible in the paper and ink world; others will focus on disciplines, time periods, subjects, agencies, and so forth in ways that will expand, not limit, their constituencies. This will make them stronger because of their ability to share, network, and deliver information anywhere.

Finding 13: The mix of library types in the Program is idiosyncratic and not strategic

- Original anticipations for a role for the state library agencies in coordinating services have in only some states held traction.

This point would be clearer if it included statistics to support its assertions.

- Public libraries participate in the Program on a patchwork basis rather than consistently, and the Program offers no particular incentives or requirements for public library participation.

It is not clear from the evidence provided that this is true. If it is true, what are the implications? Should the program endeavor to keep or attract public libraries with new incentives?

- The apparent benefits of participation have declined for many libraries, especially academic and law libraries, both of whose directors may increasingly believe that they can serve local government information needs through licensed and freely available online services without serving as a depository. If academic libraries continue to reduce their role in the Program and/or withdraw from it, the needs of the American public will be less well served, adding to importance of the role of public and state libraries in providing services to the American public.

In the past, the common wisdom was that some libraries participated because the program provided an inexpensive way to increase volume count. Whether that was true or not, similar arguments are being made now that reveal similar thinking that focuses only on local values and local benefits and the “value to the parent institution.” With its geographical focus (when that was the best way to ensure access universally) and its retention policies (to ensure preservation), and its open access policies, the FDLP has always had an explicit value of making government information available to the public at large – not just to the individual library-participants. This mission has not changed. The report should indeed address how to make these two different focuses (local vs. universal), complementary rather than incompatible. One way to do that is to leverage the need for all libraries to build digital collections and provide digital services. By providing free, public domain digital information and combining that raw information with training, tools, and a shared infrastructure of libraries, experience, and goals, a digital FDLP, could provide new incentives for libraries of all sizes.

Implication: The Program must afford additional focus to serving the needs of the American public in addition to specialized local communities, prioritizing the participation of public and state libraries to the greatest extent possible and considering additional incentives to drive academic and law libraries to broaden to the greatest extent possible the communities they are able to reach out to and serve.

As noted above, we do not see the need for FDLP libraries to focus only on local

communities anymore. In addition to being able to do that, libraries can now focus on communities of interest that have no geographic boundaries. Academic and law libraries fit in well with this model: by focusing on disciplines and topics, areas of law and legal issues, different libraries can develop strengths and all libraries can then benefit from that.

It is not clear why the report apparently finds the pattern of participation by public libraries defective by calling it “patchwork.” First, couldn’t the same pattern of participation be ascribed to academic, law, special, state, and county libraries? Second, isn’t this pattern of participation actually a strength? FDLP consists of some libraries of all types, not all libraries of all or any one type. This provides it a diversity of interests and focuses and expertise and, yes, of collections.

It is not clear from the report that libraries are withdrawing in increasing numbers. In fact, there is a steady increase over the long term and a maintenance of membership despite current economic conditions. Page 9 of draft background document even cites the 2009 Biennial FDLP survey that 99% of depositories are NOT considering withdrawal.

The Network of Libraries: Overall Implication

To be sustainable, the network of libraries that makes up the FDLP must accomplish Program priorities through the organization of libraries into roles that more closely align with the priorities and strategies of the library community, supporting libraries in taking on roles individually or collaboratively that match with local strategic priorities.

This final implication is both too general and not broad enough. It suggests libraries need to focus on the needs of the library community and on their “local strategic priorities.” Left out of this equation are the user community and the benefits and values of the society as a whole. Frankly, we see libraries as secondary in the list of our priorities. We will have sustainable libraries only if we take care of our users (including but not limited to our parent organizations) first. We become sustainable by doing our job.