



Government Documents Round Table • American Library Association

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Ms. Mary Alice Baish
Superintendent of Documents
U.S. Government Printing Office
732 North Capitol Street NW
Washington DC 20402

Dear Ms. Baish,

On behalf of the Government Documents Round Table (GODORT) of the American Library Association (ALA), we applaud the willingness of the U.S. Government Printing Office (GPO) to actively and thoughtfully consider changes to the Federal Depository Library Program (FDLP) in order to continue to strengthen the FDLP and improve its long-term viability. In light of this, we also appreciate your solicitation of feedback regarding proposed changes to the Administrative rules governing the FDLP, and we look forward to our ongoing dialogue.

The proposal put forth to modify the retention guidelines for regional depository libraries in the policy discussion document announced in the FDLP Connection (vol. 4, iss. 3), distributed July 16, 2014, would provide authorization for a regional library to discard tangible depository materials from their collections if the publications (1) have been retained by the regional in tangible form for a period of seven years and (2) are available as authenticated and digitally signed files in GPO's Federal Digital System (FDsys). It is inferred from the discussion document that the Office of the Superintendent of Documents has received confirmation from GPO's Office of the General Counsel that this proposed change complies with 44 U.S.C § 1912.

Because the community has yet to conduct research on or come to consensus about the number of copies and geographic distribution of historic physical documents necessary to assure preservation of and access to the FDLP collection, GODORT finds that it is in the best interest of the long-term viability of the FDLP to first conduct research on the national collection before beginning to allow regional depository libraries to do any electronic substitution.

We understand that a few regional depository libraries are facing challenges in space allocated for collections, but the Superintendent of Documents along with the FDLP community should explore other options to address these space challenges in order to continue to ensure the provision of permanent no-fee public access to federal government information resources. Therefore, the position of GODORT is that this policy change should not be implemented at this time.

In general, GPO policy changes that will result in withdrawal and discard of materials from regional collections should be based on evidence that shows that the changes, at minimum, will do no harm and preferably will provide a demonstrable benefit to public access and preservation. Prior to the establishment of any policy allowing electronic substitution for regional depository libraries, we highly recommend that substantial progress be made in assuring permanent access to tangible materials, born-digital files, and digitized surrogates of historic tangible materials. This progress includes:

- first, GPO and the FDLP community collaborating on the development of a national inventory of historical federal publications held in depository libraries;
- second, GPO and the FDLP community encouraging and subsequently making decisions based on research that establishes standards for the appropriate number of tangible copies of a publication necessary to ensure ongoing access, re-use, preservation, and possible re-digitization;
- third, FDsys undergoing a Trusted Repository Audit and Certification (TRAC); and
- fourth, GPO adopting a rigorous quality assurance (QA) process to guarantee the quality, completeness, and re-usability of digitized and born-digital publications made available for substitution. (see for example “The Digital-Surrogate Seal of Approval: a Consumer-Oriented Standard.” James A. Jacobs and James R. Jacobs. D-Lib Magazine, Mar/Apr 2013, vol. 19, no. 3/4, <http://dx.doi.org/10.1045/march2013-jacobs>)

One of the strengths of the FDLP has long been the relationship between redundancy, and reliable access and preservation. The policies and requirements of the FDLP must continue to assure this key tenet. Although the content in FDsys is duplicated in the LOCKSS-USDOCS network, we continue to be concerned about the long-term implications of relying on a single entity as the sole source for the digital version of a publication, particularly in the current uncertain environment of Congressional appropriations. The need for FDsys, including its succession plan, to be independently audited by a trusted organization for long-term reliability under internationally-recognized standards such as TRAC becomes more pressing as reliance on its contents increases.

The government documents community recognizes the need for quantitative and qualitative research into the long-term persistence of paper and microformat government documents for access, preservation, and possible re-digitization, in order to meet the ongoing and changing needs of diverse user communities. Ultimately, we hope that research will produce a decision tree that takes into consideration the content, format, original distribution, audience, and user needs of the original publication before recommending a desirable threshold for number of tangible copies retained in the national collection, both for shorter and long-term timeframes. The geographic distribution of these materials is also an important topic of study.

Until this research can be conducted and reviewed, we recommend that a conservative approach be taken. We are encouraged that GPO continues to conduct planning to ensure the long-term availability of federal publications published in paper format, regardless of the status of their digital surrogates. In light of this priority, we encourage GPO to develop measures to proactively ensure and subsequently confirm that an adequate number of tangible copies are held in a geographically dispersed manner through the cooperative development of a national inventory to identify holdings and document retention commitments for tangible historical publications.

Prior to permitting any wholesale substitution of FDsys content for regional depository libraries, we recommend that GPO audit FDsys collections to correct gaps in coverage. We also encourage the adoption of a rigorous QA process prior to certifying any digitized document as an authentic publication suitable for electronic substitution.

We are grateful for the opportunity to provide our initial response to this proposal, and look forward to future dialogue regarding crucial changes to the FDLP. Our shared vision of ensuring no-fee permanent public access to government information resources through a strengthened FDLP must be achieved through ongoing cooperation, and we are pleased to be partners in this process.

Sincerely,



Helen Sheehy
GODORT Chair

cc: Marie Concannon
Chair of Depository Library Council