ALAAmericanLibraryAssociation

August 26, 2014

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

Dear Ms. Baish:

The American Library Association (ALA) thanks both you and the Public Printer for this opportunity to comment on the proposed changes to the regional depository library's discard policy. We share a strong desire to ensure no-fee public access to and preservation of government information and the Federal Depository Library Program (FDLP) plays a central role in making this possible. As you found in your forecast study, there is an increased need for flexibility in the FDLP, espcially for regional depository libraries and we are appreciative that the Government Printing Office (GPO) is working towards that end.

In preparation for this response, we sought comment from ALA members to learn their thoughts on the proposed policy. As you are aware, viewpoints vary, however there are some points of commonality.
- Appreciation that GPO is being responsive to the needs of the community.
- The need for flexibility in a changing library environment.

The proposed policy takes steps to allow flexibility while seeking to retain the accessibility and preservation of the collections. We support this policy change as regional depository libraries must balance space constraints, staffing pressures, and increased electronic documents. Given that usage for in person retrieval of depository items has decreased, the pressure to make changes to these collections has increased. That said, ALA does not want to hinder long term preservation of government information in order to make this possible.

There were some concerns raised among our membership:
- What is the "requisite number of tangible copies" and what would be their geographic distribution? As an official study has not been done, when and how would GPO make this consideration?
- How long would regional libraries need to wait after making a request to discard and what would this process entail?

While ALA is aware of and grateful for the capability of GPO's Federal Digital System (FDsys), we do feel that FDsys should undergo a Trusted Repository Audit and Certification (TRAC). Given that FDsys is a "content management system, a preservation repository, and GPO's system of record for providing free online access to official digital Federal information" it would be beneficial for its long term success to be independently audited and certified.

Again, we thank you for the opportunity to comment on this proposed policy change and look forward to working with you as we move towards a more flexible plan that still ensures no-fee access to and preservation of Federal government information.

Sincerely,

Emily Sheketoff

Emily Sheketoff
Executive Director of the Washington Office
American Library Association