August 12, 2011

Robin Haun-Mohamed, Director
Collection Management and Preservation
US Government Printing Office
732 North Capitol Street, NW
Washington, DC 20401

Dear Robin:

We have reviewed your letter of July 20, 2011, sent to Cheryle Cole-Bennett and hope to resolve the issues you raised therein. To help us answer these questions, we would like more information about the responses you received from your survey of depository libraries regarding the ASERL plan, particularly the following:

- Total number of Regional depositories in the 10 southeastern states that responded;
- Total number of Selective depositories in the 10 southeastern states that responded;
- Total number of Regional depositories outside the 10 southeastern states that responded;
- Total number of Selective depositories outside the 10 southeastern states that responded; and
- The number of replies that you would characterize as "supportive" of the ASERL plan and the number of replies that you would characterize as "concerned" about the ASERL plan.

We understand your desire to protect the privacy of individual respondents, but feel that disclosing the number and characteristics of the respondents is important to assessing the survey results. Having this additional information will allow us to resolve any outstanding misconceptions within the region and provide the greater clarity you seek. In the meantime we can provide the following responses, but reserve the right to modify these after we have had an opportunity to better understand the number and nature of the survey replies.

Please keep in mind that this plan change was discussed in depth for more than a year amongst the 37 ASERL library directors who manage both Regional and Selective Depository Libraries, and with the deans from the two Regional Depository Libraries that are not ASERL members. The plan received unanimous support. It was also discussed in depth with documents librarians throughout the 10 state region and received very broad support.

1. In your letter you note that there was concern that Regional Depository Libraries will no longer receive discard lists and will lose interaction with the discards from the Selectives in their states. This concern is unfounded, as the Implementation Plan states (Section V.4, page 8):

> "This Implementation Plan does not abrogate the responsibility of a Regional Depository Library to consult with Selective Depository Libraries in its state or under its purview on matters of depository collection development, retention, disposal, and disposition. Each Selective Depository Library in the Southeast

Region should still discuss significant changes in its depository status or collection management, including major weeding projects, with its Regional Depository Library and should take advantage of the Regional Library's knowledge and expertise in depository matters. Each Regional Depository Library will assist its Selective Depository Libraries with interpretation and implementation of this Plan."

The ASERL Documents Disposition Database software is a very effective means of implementing the discard process once this consultation has occurred.

You note "…it is perceived [Regionals] will lose regular interactions with [Selectives'] discards activities." We believe the Disposition Database will relieve much of the manual processing and searching of discard lists that currently consumes far too much staff time at both the discarding library and its Regional for very little benefit. Additionally, since the database can be searched and sorted, Regionals can still review the items posted by their Selectives if they wish to do so.

You also note that "wholesale weeding and substitution without review of the needs of the statewide or regional collection are inconsistent with the legal mandate." The overarching goal of the ASERL plan is to enhance the completeness of documents collections across the region. The purpose of the Disposition Database is to facilitate this collection enhancement. To accomplish this, the ASERL plan modifies the traditional state-based discard process for a region-based discard and acquisition process. This change provides libraries that are serving as a Center of Excellence – wherever they may be located in the region – first priority to select items that relate to their area of specialization.

We are confident the software is a major improvement in managing the discard and acquisition process, and it was only possible because of the agreement on common disposition processes among all of the Regional Depository Libraries in the 10 southeastern states. As of August 1, the software accepts needs lists and matches needs with offers to facilitate placement of discarded items. The LibGuide at http://guides.uflib.ufl.edu/ASERL-DispositionDB describes the software. We would be happy to arrange another demonstration for GPO staff to showcase the new needs list capability.

2. You also inquire about an issue "when a selective library was urged to use a regional library in another state to authorize the discard or withdrawn depository material because its regional library was not using the pilot Disposition Database." ASERL has never advocated for this. We are working with the Regionals in each state in the Southeast to facilitate implementation of the Disposition Database. Items that are posted to the Disposition Database may be available to depositories anywhere in the Southeast region, but that does not change the reporting relationship between Regionals and the Selectives within a state.

According to our records, there are two Selectives in states that have not yet fully implemented the Disposition Database that have used the Database. Clemson University is a Center of Excellence and is in close contact with its Regional at the University of South Carolina. The Mississippi University for Women needed to post an extensive discard list and
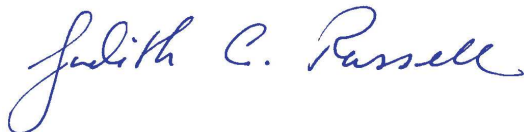
Laura Harper from the Regional (University of Mississippi) set up the account for them and posted their first lists.

3. Lastly, you note that one respondent was concerned about shipping charges they may incur when offering materials to other depositories. This was the subject of much discussion, and we agreed that shipping fees of $50 or less would "usually" be the responsibility of the offering library. In Section VI.6 on page 12 of the Implementation Plan, it states that this would "usually" be the case, allowing the parties involved to negotiate who will pay such costs if there was a hardship or other extenuating circumstance. Prior to harmonizing the disposition practices, half of the Southeastern states required the disposing library to pay for shipping and half required the receiving library to pay. This compromise acknowledges that there is a cost to set up another institution in the paying institution's accounting system when only a small amount of money is involved, but it also retains flexibility.

We hope this resolves the concerns you have about the ASERL Implementation Plan. You will recall that the draft plan (which differed only slightly from the final Implementation Plan) was reviewed by GPO Counsel and found to be in compliance with compliance with 44 *U.S.C.* Chapter 19, the statute governing the Federal Depository Library Program.

On behalf of ASERL's FDLP Steering Committee, we look forward to continuing this conversation as you desire.

With kind regards,

Judith Russell
Chairperson, ASERL FDLP Steering Committee
President-Elect, ASERL Board of Directors
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