



May 16, 2012

Mr. John Burger  
Executive Director  
Association of Southeastern Research Libraries  
Box 90182 / 411 Chapel Drive  
226A Bostock Library  
Durham, NC 27708

Dear Mr. Burger:

We have reviewed the *Southeast Region Guidelines for Management and Disposition of Federal Depository Library Collections* (Revised April 2012) in response to your email request dated May 2, 2012. As previously noted, GPO finds the Documents Disposition Database process to be compliant. Specifically, the revised disposition workflow:

- Restores the authority and priority access to offers by the regional depository library or libraries in the state or region served by that library; and, subsequently,
- Grants selective depository libraries an opportunity to review offers not needed by their regional depository library or libraries in the state or region.

While GPO is not in a position to approve the Implementation Plan, we note two issues of concern. First, there are similar statements within the document, specifically the Disposition Priorities and the Needs List Priorities, which are inaccurate. Within Section VI, 2A and 2B, and Section VII, 2A and 2B, it is stated that “[T]he Superintendent of Documents has determined that...” in describing the selection order by Regional and Selective depository libraries. The selection order is determined by statute as set forth in 44 U.S.C. §1912, and not by the Superintendent of Documents. GPO respectfully requests that all four instances of this wording be amended to read as follows to reflect the statutory foundation of the selection order:

*“44 U.S.C. §1912 requires that...”*

Second, within Section II, 2A, Preference for Original Printed Documents, the text currently reads:

*“Due to concerns about the lack of availability of preservation-quality microforms, wherever possible an original printed document will be obtained. When that is not possible, an effort will be made to obtain a print facsimile. When the original documents are not available in print, stable links to or locally hosted digital reproductions that are available in the public domain may be used to ensure access.”*



GPO is concerned that a regional depository library may interpret this statement to mean that, if they cannot secure a print document (original or facsimile), they may forego the acquisition of available microfiche copies in favor of stable links or locally hosted digital reproductions in the public domain. According to statute, Regional depositories must:

*"[R]etain at least one copy of all Government Publications either in printed or microfacsimile form..." (44 U.S.C. §1912)*

In order to reflect Regional depository library retention requirements as set forth in 44 U.S.C. §1912, GPO respectfully requests that Section II, 2A, third sentence, be amended to read as follows:

*"When the original documents are not available in print or GPO-issued microfiche..."*

GPO appreciates the opportunity to review ASERL's revised *Southeast Region Guidelines for Management and Disposition of Federal Depository Library Collections*. Please contact me if there are questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Mary Alice Baish".

MARY ALICE BAISH  
Assistant Public Printer  
(Superintendent of Documents)

cc: Davita Vance-Cooks, Acting Public Printer of the United States  
Drew Spalding, General Counsel, U.S. Government Printing Office  
Andrew Sherman, Chief Communications Officer, U.S. Government Printing Office  
Dominic Storelli, Joint Committee on Printing, Committee on House Administration