



August 28, 2014

Mary Alice Baish, Superintendent of Documents  
US Government Printing Office  
732 North Capitol Street NW  
Washington, DC 20401-0001

Dear Ms. Baish:

Thank you for sharing the draft "Government Publications Authorized for Discard by Regional Depositories;" we appreciate the invitation to provide comments on this draft.

As you know, ASERL members have long had a keen interest in creating ways to build comprehensive-as-possible print FDLP collections as a regional asset. Our Collaborative Federal Depository Program offers a means for libraries in the Southeast to focus their collection development to further this goal. For the past several years FDLP libraries in the Southeast have been able to identify specific agencies or SuDoc stems as a "Center of Excellence" (COE). These libraries are devoting significant resources to build their print collections in those areas via inventorying, cataloging, and filling gaps in their COE areas.

As we build a print archive of FDLP content to serve the region, it is also clear the overwhelming majority of library users are quite satisfied with electronic access -- both born-digital content, and content that has been retrospectively scanned/processed for online searching and use. ASERL has long been concerned that the current FDLP model requires more print collections than appears to be necessary to satisfy the need for the American public's access to FDLP content. As a result, many FDLP libraries struggle with supporting significant, unnecessarily-redundant legacy print FDLP collections, many of which go largely unused. We are encouraged to see GPO consider new ways to balance the print-electronic transition; exploring ways for Regional depositories to consider weeding portions of their legacy print content when good-quality electronic substitutes are available is a fine place to start.

In short, our comments on your draft are as follows:

1. The draft you provided contained little information about the process for this print-electronic transition, and that is critical information for us to evaluate. Lacking that information, we can say the process must be reasonably simple, transparent, predictable, and fair. It must equitably balance the relief provided to libraries with immediate needs to winnow their print collections against those libraries which may need to do so years in the future.
2. We again strongly suggest GPO provide incentives for depositories to take on print retention commitments, such as providing cataloging records for legacy collections via OCLC to ease collection management responsibilities, and procuring large scale digitization of the legacy print corpus as well. This could be done in collaboration with FDLP libraries that are willing to donate discards or loan portions of their collections for digitization.

**ASSOCIATION OF SOUTHEASTERN RESEARCH LIBRARIES**

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3. Another incentive GPO could provide would be agreements from federal agencies whose missions include collecting and providing access to the nation's intellectual content (e.g., Library of Congress and National Archives and Records Administration) to undertake some of these long term print retention responsibilities, to supplement content retained by FDLP libraries.
4. We agree a modest minimum number of print copies must be retained, and that there is a need for a logical distribution of those copies. When combined with online access to FDLP content via FDSys, we believe 5 - 10 print copies held nationally -- including copies held by GPO / LC / NARA -- would fulfill GPO's public access mission.
5. We urge GPO to rapidly develop a means for authenticating additional content -- including documents scanned by FDLP libraries and other reliable content providers -- for inclusion in FDSys and ultimately covered by a discard policy.
6. We recommend GPO identify and provide support for a non-governmental electronic repository (e.g., HathiTrust) to serve as an official supplementary access point to the growing collection of electronic FDLP content.
7. Lastly, we believe it would be useful for FDSys to undergo TRAC certification in the future to become a Trusted Digital Repository, to ensure electronic access to FDLP content remains reliable for the foreseeable future. This is a longer-term objective; we feel TRAC certification should not delay implementation of this discard policy/process.

As you know, ASERL has developed open source software to manage the disposition process in the Southeast. If it is useful, we would be glad to provide the code for the Disposition Database to GPO for your modification/use in implementing this new disposal process.

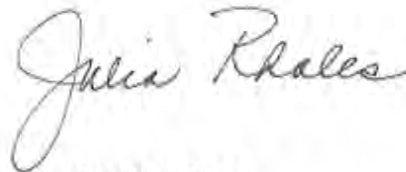
We greatly appreciate the chance to comment on this draft and look forward to continuing the conversation in the future.

Kind regards,



Thomas F. McNally, President  
ASERL Board of Directors

Dean of Libraries  
University of South Carolina



Julia Rholes, Chair  
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Dean of Libraries  
University of Mississippi

cc: Davita Vance-Cooks, US Public Printer  
ASERL Collaborative Federal Depository Program Steering Committee