



August 30, 2017

Davita Vance-Cooks, Director
US Government Publishing Office
732 North Capitol Street NW
Washington, DC 20401-0001

Dear Ms. Vance-Cooks:

For more than 60 years, the Association of Southeastern Research Libraries [ASERL] has brought together leaders from research, federal and state libraries in the region to foster a high standard of library excellence through inter-institutional resource sharing and other collaborative efforts. The ASERL region includes 10 states and 2 territories with a strong FDLP presence comprised of 248 depository libraries in Alabama, Florida (includes Puerto Rico and the US Virgin Islands), Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, and Virginia. 37 of ASERL's 38 members are Federal Depository Libraries.

In 2011, ASERL members unanimously approved the *ASERL Southeast Region Guidelines for Management and Disposition of Federal Depository Library Collections*, the product of a process that first began in 2006, and which serves our common mission to manage and improve print and digital access to these critical collections. A core tenet of this program is that FDLP materials are a valuable information asset to the Southeast region and should be managed regionally. Today, 222 FDLP libraries actively address the increasing cost of managing, preserving, and providing access to these large legacy collections through our Collaborative Federal Depository Program [CFDP].

The need for flexibility in managing these assets has never been more important. That said, ASERL firmly believes the following basic values must remain at the center of the FDLP:

- No-fee, permanent public access to government information from all branches of government, regardless of format must be assured.
- FDLP collections must be fully cataloged, inventoried, digitized and preserved.
- The associated financial, technological, and logistical implications of providing these services to the public must be acknowledged and incentivized.

We believe any changes to Title 44 should include:

- Acknowledgment that the balance of dissemination has overwhelmingly shifted from print distribution to electronic access; therefore digital access should be the default method of

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dissemination. Print distribution should be optional for Regional and (where appropriate) Selective FDLs.

- Long-term preservation of print and electronic content must be a central responsibility that is shared among federal agencies and nonprofit, public-serving organizations outside the federal government. Funding and/or other incentives must be provided to preservation sources to ensure longevity and sustainability;
- Support for collection management and preservation activities that allow for digital substitution by FDLs in existing collections when sufficient print preservation copies have been assured.
- Flexibility for FDLs to design and implement collaborative projects, including GPO support for shared and multi-state Regional Depository Libraries that allow Regional FDLs to share responsibilities for collection management and service to Selective FDLs across state lines.

We look forward to the continued opportunity to work with the Government Publishing Office in enacting changes to Title 44 that provides the flexibility and modernization to achieve this shared vision.

With our thanks for your thoughtful consideration of this matter.



Robert E. Fox
President, ASERL Board of Directors, *and*
Dean of Libraries, University of Louisville

cc: Sen Richard Shelby, Alabama
Rep Greg Harper, Mississippi