



**ASSOCIATION OF SOUTHEASTERN RESEARCH LIBRARIES**

June 24, 2021

Laurie B. Hall, Superintendent of Documents  
U.S. Government Publishing Office  
732 North Capitol Street, NW  
Washington, DC 20401

RE: Request for Comments: Federal Depository Libraries Relinquishing Their Designation

Dear Superintendent of Documents Hall:

Thank you for the opportunity to provide comments on “Federal Depository Libraries Relinquishing Their Designation: Strategic Disposition of Depository Materials in Support of the National Collection.” SOD-DGD-2021-1.

The Association of Southeastern Research Libraries (ASERL) heartily supports the efforts of the U.S. Government Publishing Office to build and preserve a comprehensive collection of public government information. This concept has been at the heart of our Collaborative Federal Depository Program (CFDP) since its inception in 2006. While much work has been done over this time, a clearly defined National Collection remains elusive. The lack of a national union catalog of FDLP materials continues to make the process of identifying and acquiring a comprehensive collection difficult at best.

We agree that depository libraries have long seen the disposition of materials process as burdensome, but we question the need and purposes of this current document under review.

- Since 1995, Regional depositories - either by themselves or in cooperation with consortia - have created successful systems that significantly improve the discard system.
- Further, ASERL acknowledges the yeoman’s work being done by the Regional and Selective Depositories in the Southeast over the past 15 years. Together, these libraries have established the CFDP and embraced the ASERL Documents Disposition Database to simplify and streamline the disposition process and further strengthen FDLP collections in the Southeast region.

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- Since 2012, 100,500 discarded documents have found homes among the 232 depository libraries registered to use the ASERL Documents Disposition database. Of these, almost 50,000 Federal documents have been claimed for Center of Excellence (COE) collections.
- When FDLP eXchange was launched in 2018, we implemented database enhancements to ensure offers which had expired in the ASERL Documents Disposition Database could be easily exported for use into FDLP eXchange, making those items available to all federal depository libraries across the country. Our CFDP program guidelines specifically encourage posting materials that would be rare or likely to be of significant interest beyond the region<sup>1</sup>.
- The similarities between the objectives of ASERL’s CFDP and GPO’s Preservation Steward program are clear. As a result, CFDP-participating libraries have been well-positioned to support the Preservation Steward program, several agreeing to preserve collections for which they were already a Center of Excellence. We encourage GPO to acknowledge that there are other partnerships, such as the ASERL Centers of Excellence, that may not be official Preservation Stewards, but nevertheless should be given priority in the disposition process because of the important contributions they make to gathering and preserving parts of the FDLP collection.
- The ASERL Documents Disposition Database further supports this initiative in allowing libraries needing items for their COE collections to have priority access to items posted for discard.

Title 44 Section 1912 -- as echoed in other GPO guidance -- has long been interpreted that “by law, regional depository libraries are responsible for the disposal process in their state/region.”<sup>2</sup> Regional depository libraries take these roles very seriously. It is a deeply-rooted operational principle that the Regional has the appropriate knowledge or context to understand the pressures behind the Selective depository’s decision to leave the FDLP and the competence to work closely with LSCM to steward the process. Any changes -- such as those proposed here -- should be designed transparently in conjunction with the community, seeking to bolster the existing system rather than prescriptive changes seemingly made without community input. The lack of a clearly defined communication channel and coordination of actions that explicitly includes the Regional has the potential to disrupt and erode existing processes and relationships. These relationships are recognized as being “an essential part of maintaining the strength and utility of the FDLP”<sup>3</sup>.

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<sup>1</sup> Southeast Region Guidelines for Management and Disposition of Federal Depository Library Collections: The Collaborative Federal Depository Program. [http://www.aserl.org/wp-content/uploads/2018/10/ASERL\\_FDLP\\_GUIDELINES\\_Revised\\_Final\\_2018\\_09.pdf](http://www.aserl.org/wp-content/uploads/2018/10/ASERL_FDLP_GUIDELINES_Revised_Final_2018_09.pdf)

<sup>2</sup> “Weeding a Depository Collection” - <https://www.fdlp.gov/requirements-guidance/guidance/30-weeding-a-depository-collection>, and “Leaving the FDLP” - <https://www.fdlp.gov/requirements-guidance/guidance/21-leaving-the-fdlp>

<sup>3</sup> “Regional Depository Libraries”, <https://www.fdlp.gov/requirements-guidance/guidance/3831-regional-depository-libraries>

Additionally, the interpretation of Sections 1909-1912 makes a distinction between the disposition of materials from a Selective depository library leaving the program and the more routine disposition of weeded materials which creates two classes of unwanted publications – (1) those no longer wanted because of age or condition, and (2) those no longer wanted because the Selective no longer wants to be a depository - with differing disposition processes and authority. We understand the desire of the Superintendent of Documents to have a more active role in the disposition of materials from libraries relinquishing their depository designation. However, we echo recent concerns expressed by the Depository Library Council in response to proposed legislative changes to Title 44 U.S. Code Chapter 19, section 1912 *that additional requirements related to disposition will create unnecessary burdens for selective depositories. Alternatively, strengthened communication between regional depositories and GPO would facilitate the transfer of materials to Preservation Stewards and other libraries actively working on preservation efforts.*<sup>4</sup>

As stated above, the current draft risks damaging the roles and relationships of the Regional Depository and the successful discard systems currently in place. Rather, we would encourage GPO to work more closely with Regional Depository Libraries to provide additional resources for stewarding the disposition of materials from libraries relinquishing their depository designation. This can be done in conjunction with the Superintendent of Documents to ensure collections and services continue to be available.

- GPO should consider simultaneous visits of GPO staff and the Regional Depository Library staff to consult with the library leaving the program, funding the travel of the Regional when that is necessary.
- In particular, we think this statement should be modified: “Authority for the final disposition decisions will rest with the Superintendent of Documents” to indicate that the final disposition of any items remaining *after all the other enumerated steps in the disposition process have been taken* will be made in consultation with the Regional Depository Library.
- We would further encourage GPO to continue to coordinate with Selective and Regional federal depository libraries in creating a clearly defined National Collection of U.S Government Public Information, one which nurtures flexibility for collaboration and innovation while ensuring tools are available at the regional/consortial level for identifying and building comprehensive collections and services.
- We also believe additional new resources are needed to improve training and education to ensure FDLP libraries are better equipped to sustainably manage their collections.
- Last but not least, we encourage GPO to enhance the functionality of FDLP eXchange to assign Preservation Stewards, and other libraries/programs engaged in preservation efforts, priority access to items which meet their preservation collection

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<sup>4</sup> Feedback from the Depository Library Council on proposed legislative changes to Title 44, U.S. Code, Chapter 19. <https://www.fdlp.gov/file-repository/about-the-fdlp/title-44-revision/4697-feedback-from-the-depository-library-council-on-proposed-legislative-changes-to-title-44-u-s-code-chapter-19>

needs. This would strengthen confidence that government information preservation efforts are well supported on a national level via FDLP eXchange.

Depository libraries in the Southeast have a long history in supporting public access to government information and in establishing collaborative efforts to manage and preserve these important resources. For 15 years, these libraries have shaped a disposition process that supports the intentional building of comprehensive tangible collections. Our process is attentive to the needs of preservation efforts that helps assure the future availability of these materials. We appreciate the chance to provide feedback on the draft guidance document and thank you for your consideration of our comments.

Kind regards,

A handwritten signature in blue ink, appearing to read "John Burger". The signature is fluid and cursive, with a large initial "J" and "B".

John Burger, Executive Director