October 13, 2022

Scott Matheson, Superintendent of Documents  
U.S. Government Publishing Office  
732 North Capitol Street, NW  
Washington, DC 20401

RE: Request for Comments: Draft Report of the Task Force on a Digital FDLP

Dear Superintendent of Documents Matheson:

Thank you for the opportunity to comment on the GPO Task Force on a Digital Federal Depository Library Program Draft Report (September 14, 2022). We commend Director Hugh Halpern for commissioning the Task Force, as well as its 23 members representing a broad spectrum of the government documents community, for their thoughtful consideration of the feasibility of an all-digital FDLP.

Each of the Task Force’s working groups sought to answer two questions:

- Can the FDLP go all-digital? and
- Should the FDLP go all-digital?

Collectively, the determination was in the affirmative on both counts. Possibly more prophetic, are the risks acknowledged for an FDLP that does not transition or is unresponsive to the evolving lifecycle management necessitated in a primarily digital environment. History has shown an enterprise unable or unwilling to transform to meet evolving expectations and practices is destined to become obsolete.

For obvious reasons, FDLP obsolescence is not an outcome anticipated in GPO’s organizational goals as defined in the National Collection of the U.S. Government Public Information Strategic Plan for FY 2023-FY2027 (September 2022). Rather, strategies call for evolving multi-year activities focused on building and curating the National Collection while transforming GPO’s Library Services and Content Management unit (the business unit responsible for information dissemination) to a primarily digital content and services organization. The plan also recognizes collaboration and partnerships as integral to the lifecycle management of tangible and digital public government information, ensuring the public’s free, equitable, and convenient access to the past and present Government information resources.
The report notes that a move to a digital FDLP is not revolutionary; in many ways it is a natural evolution. The Association of Southeastern Research Libraries (ASERL) has long supported collaboration and evolutionary processes with initiatives in support of FDLP collections. Since 2006, ASERL and GPO have partnered in various ways to develop the ASERL Collaborative Federal Depository Program. This program enhances print FDLP collections within the Southeast Region, while also supporting efforts to make more FDLP content available digitally, all built on a foundation of working within the existing framework of Title 44. We see GPO’s Preservation Stewards program and the Shared Regionals service models as furthering this model and sharing the responsibilities and costs of managing these important legacy collections.

ASERL wholeheartedly agrees that GPO can and should move to a digital FDLP. As we read the Task Force report, we applaud the Task Force’s clear-eyed acknowledgement of the “significant societal, technical, implementation, practice, and legislative matters that require consideration” to ensure this evolution becomes reality.

- We affirm the statement that “an agreed-upon definition [of an all-digital FDLP] is essential for GPO to create a vision, develop implementation plans and strategies, engage stakeholders, and create collective action.” To that end, we find the intermingling in the use of the terms “All-Digital” and “Digital” throughout the report creates ambiguity in the vision and expectations for the future of the program. Consistency in terminology in the final report would be helpful.
- Further, ASERL supports the use of “digital FDLP” rather than “all-digital FDLP” in this context, as we believe an “all-digital” definition implies the absence of all formats other than digital, which is not in keeping with the expectations for the National Collection (which defines U.S. Government Public Information “as products, regardless of format or medium”).
- Relatedly, the adopted definition of “An all-digital Federal Depository Library Program delivers permanent no-fee public access to digital content and essential support service to people seeking U.S. Government information” does not give the sense of a transformational program and appears to divide the past and present from the future. A comment from the Survey of LSCM Personnel echoes this concern, that the new definition “seems to ignore the fact that the largest single asset of government information in the FDLP is the tangible collection held among the 1000 libraries. The digital content, newly created, and to be acquired and archived and the content on the govinfo.gov, are a fraction of the historically and culturally significant content available in the tangible and digital National Collection.” We believe the definition would be strengthened and provide greater clarity by acknowledging these important legacy resources. We also agree with many of the working groups’ assumptions that a digital FDLP should not preclude the tangible, as there is likely to be the need for content to be available in print or another format into the future.
- We commend the Task Force for acknowledging that this initiative is also bound by the confines of the current Title 44. The Title 44 working group succinctly stated that the challenges to GPO “are too profound to assume that success can be achieved under the current version of Title 44. Steps can be taken toward an all-digital FDLP...” However, we do have examples of transformative work occurring within the existing framework of Title 44; GPO’s Preservation Steward Program and Shared Regionals service model and ASERL’s CFDP all build on the same foundation of sharing the responsibility and costs of managing collections. Although the CFDP is primarily a program to enhance the legacy print corpus, from the outset there has been strong agreement within ASERL
that the best means of providing broad public access to these collections is through online access to digital and digitized copies. Core to the CFDP is our belief that management of the tangible FDLP collections must include efforts to support or participate in initiatives to create a comprehensive, authentic digital collection in the public domain. As part of this, CFDP Centers of Excellence are encouraged to digitize items within their areas of responsibility when a stable public domain source is not available.

Again, we are grateful for the opportunity to provide feedback on this important matter. It is, indeed, an evolutionary process. It is our belief that, to one degree or another, the FDLP has been in an incremental state of transformation since 1895. To that end, we look forward to future opportunities to build on the CFDP experience in support of GPO’s vision and mission.

Kind regards,

John Burger, Executive Director