June 16, 2017

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

Dear Ms. Vance Cooks:

The Association of Southeastern Research Libraries (ASERL) represents ten Regional Federal Depository Libraries who serve nearly 300 Selective Depository Libraries in the Southeastern United States. Over the past decade we have implemented a region-wide set of processes and tools to help build FDLP collections across the Southeast. Through our Collaborative Federal Depository Program, 219 SuDoc classifications – including six Cabinet-level agencies – have been adopted as Centers of Excellence, and more than 66,000 federal documents have been added to FDLP collections as the result of our region-wide disposal/selection tools.

Today we are writing to request that GPO engage in a dialog with directors of Regional Depository Libraries to develop updated guidance for libraries who are considering relinquishing their Regional Depository status. Several Regionals in the Southeast are finding the current requirements to be onerous and are considering the pros and cons of a possible change in status. Like other Regionals throughout the United States, they want to understand the process before making a decision.

GPO last published guidance on these matters in 2008. "Guidance for Federal Depository Libraries Relinquishing Regional Designation" does not address important issues including the process for identifying another Regional to serve the "orphaned" Selectives. We recall the lengthy and contentious process that arose when the University of Minnesota assumed responsibility for Selectives in Michigan in 2013. The directors of our Regional Depository Libraries would like to have a dialog with GPO and their colleagues in other states to rapidly develop and promulgate updated guidelines to avoid such problems going forward.

Additionally, several library directors have indicated they might remain Regionals if there was rapid implementation of large-scale electronic substitution for their legacy print collections. This would allow a reduction of the massive, low-use print collections that are currently retained by Regional Depositories. We are aware that the Joint Committee on Printing had approved a policy for electronic substitution for Regionals more than two and a half years ago, but that policy has not yet been implemented by GPO.

The directors of the Regional Depositories in our area have also asked questions such as:
1. What is the process if I step down from a Regional Depository to a Selective, and how would it affect other
Selectives in my state?

2. If I can identify a Regional in another state willing to serve Selectives in my state, what are the criteria / what is the process for reviewing and implementing such a plan? Do the Selectives in my state have a voice in determining their “new” Regional?

3. If an ASERL Regional steps down to a Selective, is it reasonable to assume that the Selectives in that state can continue to use the ASERL disposition database/process, so there is minimal adverse effect?

We believe that the concerns of Regional Federal Depository Libraries in the Southeast are representative of the broader FDLP community. Initiation of a dialog between GPO and all of the Regionals -- with the expectation of developing and rapidly promulgating updated guidance -- would be welcomed by many directors of Regional Depositories. We ask that this be made a high priority for GPO; ASERL is willing to help foster this dialog in our region as appropriate.

Our thanks for your consideration of this important matter.

Sincerely,

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

cc: Laurie Hall, Acting Superintendent of Documents
    ASERL Board of Directors