November 6, 2023

Hugh Nathanial Halpern  
Director U.S. Government Publishing Office  
732 North Capitol Street, NW  
Washington, DC 20401

Dear Director Halpern,

On behalf of the Depository Library Council (DLC), I am presenting three recommendations and one commendation that Council approved at our Fall Business Meeting held October 18, 2023.

The recommendations refer to significant proposed changes to the Federal Depository Library Program (FDLP) amidst the implementation of a Digital FDLP. The first recommendation (#1) stems from the Exploring the Durability of PURLs and their Alternatives Working Group, which concluded its work with a final report this fall. A copy of the final report is attached to this letter and is available on FDLP.gov. Recommendations #2 and #3 come from significant discussion and community conversation that took place during the Fall 2023 Federal Depository Library Conference and in meetings about the implementation of a Digital FDLP held by GPO in September 2023. At the conference, Council held an open forum, a listening session, and attended numerous presentations where the community provided feedback about the Digital FDLP implementation. Recommendations #2 and #3 summarize requests for information from the community to inform a successful transition to a Digital FDLP for Federal Depository Libraries and for GPO.

The commendation, approved by Council, acknowledges our past colleagues who have continued to serve the FDLP community in working on Council initiatives past their original service term. This recognizes that working groups and subcommittees often take time to consider and document the challenges they are charged with investigating.

Recommendations

Recommendation #1
The Exploring the Durability of PURLs and Their Alternatives Working Group proposes that the Depository Library Council accept the PURL Working Group Report and consider three additional recommendations to transmit to GPO:

- GPO enact the Principles of Persistent Identifiers and Persistent Identifier Systems through identified measures in the PURL Working Group’s report (pp. 22-24).
- GPO explore the potential opportunities of prospective PID systems for additional uses beyond the current implementation of GPO’s PURL system, in order to improve services to FDLs.
- GPO seek, as much as is possible within the Federal technology environment, to leverage interagency efficiencies in exploring technical solutions for needs related to PID system(s).
Justification
The Working Group began addressing its charge in the spring of 2020. It investigated and researched PURLs and alternative Persistent Identifiers (PIDs), conducted focus group sessions with the depository library community, reviewed GPO’s current implementation of PURLs, and offered presentations on PIDs. Over the period of its charge, the PURL Working Group diligently explored the issues surrounding the durability of PIDs. The recommendations provided above are supported by the full report from the Working Group. I want to call attention to part of the Working Group’s conclusion:

Persistence is challenging and multifaceted. Persistence involves both persistence of the object itself as well as the ongoing organizational management of the PID and PID system. As with most technologies, the policy, administrative, and organizational issues surrounding persistent identifiers are the most critical aspects of implementing a PID system and providing persistence. The real issue for the end user is the persistent access to the objects themselves. This requires coordinated persistence of the objects and the PIDs that direct to the objects. Since the internet is a constantly changing space, no matter how stable the PID system, simply pointing to a digital object on a website does not guarantee persistent access.

The recommendations that Council is transmitting provide various approaches for GPO to consider in pursuit of persistent identifiers for government information products. They focus on policy, administration, and are cognizant of the larger Federal technology environment.

Council thanks the Working Group members for their efforts and congratulates them on completing their charge. The Working Group has now concluded its work.

Recommendation #2
Council requests access to the results of the information gathering survey conducted by GPO that was used to gauge library interest in receiving FDLP Print Distribution Titles. Council requests that the survey and the data gathered also be shared more widely with the FDLP community.

Justification
In September 2023 GPO conducted an information gathering survey among regional depositories and preservation stewards to determine library interest in receiving those titles on the Print Distribution Titles List. Access to this information will facilitate decisions made by the National Collection Service Areas and provide transparency for the general process.

Recommendation #3
Council requests that the Digital FDLP Implementation FAQs be updated following FDLP community feedback, and Council would like to review the updated FAQs to ensure that all community concerns, comments, questions have been addressed. Council also requests that GPO publish the following:

- The methodology used to determine those titles included in the FDLP Print Distribution Titles (PDT) List as well as the criteria used to determine which FDLs will receive the available titles.
- The minimum requirements for those FDLs that will accept titles from the Print Distribution Titles (PDT) List, including information on interlibrary loan, access, and preservation requirements.
- How reducing receipt of new, tangible materials provides an opportunity to shift focus for improved collection management of physical and digital collections.
**Justification**

A successful transition to a digital-first FDLP requires trust - trust among libraries and trust between libraries and GPO. It is vital that GPO continue to provide current information about the transition on their website and, in those cases when it is not advisable that information be shared publicly, communicate this information to the DLC to ensure that the body can fulfill its advisory role.

Federal depository libraries will need specific information from GPO to determine how they can continue to participate in the FDLP. Prompt updating of the FAQ based on questions received through askGPO and in NCSA meetings, and the publishing of minimum expectations/requirements for those library participants who want to continue to receive print titles is essential for FDL coordinators and their administrations’ decision-making.

Given that each NCSA may identify different criteria for determining which FDLs will receive titles from the Print Distribution Titles (PDT) list, it is essential to update each NCSA web page with the current information and make that information easily discoverable on FDLP.gov.

**Commendations**

**Commendation #1**

The 2023-2024 Depository Library Council (DLC) commends all chairs/members of working groups who served beyond their Council terms in order to complete the important work of their particular working groups. DLC recognizes the time, effort, and dedication that these members have displayed in their willingness to remain on and serve past their Council terms.

**Conclusion**

As Chair of Council, I look forward to continued open communication and dialogue with GPO amidst this transition. Thank you to you, GPO staff, and to members of the Federal Depository Library community for the opportunity to consider and discuss the impacts of these proposed changes.

Sincerely,

Jen Kirk
Government Information Librarian
University Libraries, Utah State University

Attachments: Exploring the Durability of PURLs and their Alternatives Working Group Final Report

Copy:
Scott Matheson, Superintendent of Documents
Cindy Etkin, DLC Designated Federal Officer
Hayley Johnson, DLC Secretary
Susanne Caro, 2024-2025 Depository Library Council Chair