



United States Government Printing Office  
Washington, D.C. 20401

February 24, 1999

Mr. Frederick G. Antoun, Jr.  
Attorney at Law  
247 Lincoln Way East  
Chambersburg, PA 17201-2295

Dear Mr. Antoun:

This addresses your January 18, 1999, notice entitled, "Perceived Requirement that Printers Manufacture and Deliver Negatives on GPO Contracts." In it you attempt to clarify Government Printing Office (GPO) policy on the required use and return of film negatives. Among other things, this notice made the following points:

1. GPO's policy regarding the use and return of negatives within its printing contracts is unclear.
2. GPO has yet to develop a policy that only requires printers to return negatives when they are used to print a job.
3. GPO must develop criteria for the formatting and return of digital deliverables.

In response, I wish to state that it is GPO's policy to:

1. Remain "process neutral" when contracting for printed products.
2. Require the return of negatives as a deliverable only when specifically ordered under the contract. (If a contractor elects to make and use negatives under a contract wherein GPO did not order negatives to be made and delivered, the contractor may keep those negatives.)
3. Require the use of negatives only when:
  - a. the customer specifies the use and return of negatives,
  - b. specific quality and/or film-based proofing methods are involved, or
  - c. films are furnished by the Government.

The use of the checkbox in some of our specifications which reads, "Return originals and/or films to," refers only to the return of government furnished materials.

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In regard to the development of criteria for the formatting and return of digital deliverables, GPO's contracts have included the following paragraph since 1997:

*Upon completion of each order, the contractor must furnish final production native application files (digital deliverable) with the furnished material. The digital deliverable must be an exact representation of the final printed product and shall be returned on the same type of storage media as was originally furnished. The Government will not accept, as a digital deliverable, PostScript files, Adobe Acrobat, Portable Document Format (PDF) files, or any proprietary file formats other than those supplied, unless specified by the Government.*

Due to the many variables and constantly changing dynamics associated with digital products, it is important that we remain flexible and not lock the Government into inappropriate or unenforceable standards.

With respect to educating customers and others on the issue of eliminating unnecessary negatives in print products, GPO has been at the forefront. Through various memoranda, newsletters and seminars, GPO has clearly articulated the limiting effect unnecessary negative requirements could have on competition. Our efforts have also included intensive education on digital printing of both our clients and our employees.

Finally, the presumption that eliminating negatives will result in a taxpayer benefit is not supported by our experience. First, since jobs are awarded without regard to production method, the low bid represents the interest of the taxpayer. Second, the majority of printers use negatives rather than computer-to-plate technology. Finally, there are somewhat higher costs associated with digitally created products versus products created using traditional artwork.

GPO is committed to providing customers with viable uses of current and changing technology opportunities. We are willing to work with customers and industry to deliver the best possible product at the best value to the taxpayer. Under the current dynamics of this technology, mandates do not serve as well as flexibility. We are involved in a continual education process with our customers. GPO is aware of the issues and is doing everything within its power to provide meaningful solutions.

I hope this response is helpful. If you have questions or suggestions regarding our policies, please feel free to contact me. I may be reached on 202-512-0327.

Sincerely,



MEREDITH L. ARNESON  
Manager  
Printing Procurement Department

cc: Linda Kemp, Congressional Joint Committee on Printing