October 7, 2010

National Coordination Office for Networking and Information Technology Research and Development
Suite II-405
4201 Wilson Boulevard
Arlington, VA  22230

RE: Comments on Draft NITRD 2010 Strategic Plan

The Society of American Archivists is pleased to provide comments on NITRD’s Draft 2010 Strategic Plan. As the largest national association of archivists, we’re grateful that the Plan acknowledges the need for long-term preservation, curation, federation, sustainability, and accessibility of federal records maintained by the National Archives and Records Administration (NARA). We ask that archivists be included in development of the infrastructure framework that will assure the long-term accessibility and preservation of electronic records. NARA has been a partner in several research projects touching on these issues, and SAA would like to see that role sustained in this strategic plan.

Archivists have three significant roles to play in this work. First, they have a unique perspective on the long-term use of information that can provide important insight into who might use the information and for what purpose. Any cost-benefit analysis to determine which information merits the investment of significant resources for storage, preservation, and management would surely benefit from this insight. Second, archivists have broad experience with many different types of information; they understand that storage, preservation, use, and management of this information require distinct specifications. Finally, they have significant knowledge about the nature of information apart from its content. The format and media used to store information can have a significant impact on its practical use.

SAA supports the goal of creating an infrastructure that “will be everywhere and always available” (page 11), but encourages NITRD to ensure that privacy and confidentiality are maintained, particularly for individuals who rely on such public access computers as those available in public libraries. As citizens increasingly are required to engage with companies and with the government in the online environment, every citizen must be provided with a confidential, private, and secure means of using technology.

Archivists understand the continual need to balance privacy and confidentiality with potentially competing goals, such as freedom of information and national security. We encourage NITRD to consider the legal and ethical examples set in Canada and Europe, whose governments have rigorously maintained personal privacy (most recently in cases involving American companies such as Google and Facebook). SAA encourages NITRD to take a proactive stance on protecting
personal privacy and also to encourage discussion regarding how American conceptions of privacy may shift in an increasingly digital context.

SAA views long-term preservation and accessibility of records – balanced with privacy and confidentiality concerns – to be essential. As central figures in these activities, archivists must be included in development of the infrastructure framework if long-term accessibility and preservation of electronic records is to be assured.

Sincerely,

Helen R. Tibbo
SAA President, 2010-2011