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I am writing in clear opposition to this change, which was not communicated through the appropriate informational channels previously established by significant stakeholders. In my personal involvement with the taskforce referenced (as a communication mechanism), my experience was that this group was not informed that the *only* choices were a migration to IMLS or the end of ALS with no other options. Despite my personal efforts to utilize the ongoing IPEDS Advisory Taskforce as a communication mechanism to ensure the continual alignment of the ACRL survey and ALS, I received no responses for over a year while this proposal was evidently moving into its final stages. I am particularly incensed that this proposal has been moved forward despite the fact that multiple nationwide academic library groups have submitted lengthy and comprehensive refutations of suggested motivations, and that 98% of over 700 comments submitted also opposed this change.

The #1 reason listed in Appendix E for ending ALS is its limited use, but no parameters or standards are given as to how this use is determined. Is each visit to the webpage counted as a download, or is it only when a dataset is exported? Other data and assessment Librarians have testified that they download a comprehensive dataset and use it repeatedly for a variety of uses, so this may not be an apples-to-apples comparison of the utility of the data as compared with the non-information professional users of other areas of the dataset. The six-month period of "downloads" cited may also not be a representative sample of when research is done or needed. Another given reason of burden to the users is very misleading, as many librarians have been calculating the time spent on the gathering of many datasets, including IPEDS, so these numbers might not be meaningful. More importantly, if 98% of respondents are saying that they want to keep the survey despite any burden of time, it strikes me that IPEDS has misjudged their audience. Perhaps keeping and using established communication mechanisms such as the afore-mentioned taskforce could have avoided this? The #4 issue mentioned is a data quality issue, which will not be helped by eliminating the only mandated dataset for academic library expenditures, and thus impoverishing the overall pool of available data for comparison and correction. Finally, the #3 reason mentioned includes an often-mentioned reason for the cutting of this survey, which is the shrinking federal budget, but by almost every metric I can find - the federal budget continues to increase. However, there is a very real NCES budget issue that has been escalating for years, to which I am very sympathetic. While I still oppose the elimination of ALS, I strongly encourage the OMB to replace existing positions in NCES and restore their budget and ameliorate bandwidth issues.

Thank you for your attention to this issue,