



Ecological Society of America
1990 M St, NW, Suite 700
Washington, DC 20036

January 12, 2012

Re: FR Doc. 2011-32947

Dear Madam or Sir:

The Ecological Society of America (ESA), the professional society of 10,000 ecological scientists, appreciates the opportunity to provide input to the Office of Science and Technology Policy's Request for Information on public access to digital data resulting from federally funded scientific research. As a publisher of peer-reviewed ecological journals for over 90 years, ESA policies and capabilities support data sharing and archiving and we welcome the development of agency policies and standards that will preserve and enhance access to digital data resulting from federal support.

ESA provides means for data publication and citation through *Ecological Archives*, which publishes data papers, supplements and digital appendices for our journals. This archive allows authors to make available supporting materials such as methodological details, data tables, photographs and supplemental discussion. ESA requires data archiving for papers published in our journal *Ecological Monographs* while data archiving is currently encouraged but voluntary for our other journals. The Society's interest in the development of data sharing policies is reflected in a series of workshops ESA organized. Sponsored by the National Science Foundation, the five workshops explored common data sharing policies among scientific societies, the needs for data registries and repositories and obstacles and incentives to share data.

The points below address our key ideas in regard to the development of federal agency policies and standards for public access to digital data:

- As noted by the National Science Board's recent report on digital data policies, "a single data sharing and management policy will not apply to all research communities." Stakeholders should have input in developing policies and standards within the various research communities.
- Bearing in mind the various needs of different research communities, discipline-specific, consistent standards should be developed among agencies to minimize the burden on researchers who receive funding from multiple federal sources.
- Separate funding for data archiving and curation should be included in grants and agreements to supplement rather than compete with existing research funds.

- Federal agencies should examine existing standards already in use in the private sector to determine if any may be applicable.
- Funders should consider permitting short embargo periods for required sharing of data linked to publications, in order to allow researchers to complete multiple analyses and publications based on a single dataset.
- To ensure appropriate attribution and credit, data should be published in such a way that they are traceable to authors, to related publications and to funders. For example, digital object identifiers could be used for authors and funding sources could be included in metadata.

Thank you for the opportunity to contribute to the deliberations of the National Science and Technology Council's Interagency Working Group on Digital Data.

Sincerely,

A handwritten signature in dark ink, reading "Katherine S. McCarter" with a long horizontal flourish extending to the right.

Katherine S. McCarter
Executive Director and Publisher