

Subject: Comment on public access

Date: December 7, 2011 1:20:28 PM EST

TO WHOM IT MAY CONCERN:

I am writing in support of the adoption of open access to all research resulting from the grants from federal tax dollars. It seems to me that the public has the right to access and reuse fully the results of public funded research. Although a short embargo may be acceptable to give publishers time to recoup their investment in publishing such research, the quicker the access the better in my view. Open access to research is an economic driver and helps driver the development of new jobs as new scientific breakthroughs lead to new technologies and new economic development generally. I that in recent years, the University of Pittsburgh and Carnegie Mellon University have combined to help create 300 startup companies based on federally funded research at these institutions. Open access helps to insure the broadest possible dissemination of knowledge arising from important federally funded scientific research and increases its value to the citizens of the United States.

We at the University of Pittsburgh have a long history of support for and implementation of open access publishing. The Library system has hosted several important discipline-based open repositories for a number of years and has a very robust institutional repository as well. In addition, we now are the publisher of more than 28 open access journals, headquartered at Pitt and other institutions in the United States as well as other countries. In our rather extensive experience, the utilization of research placed into open access venues is far higher than in traditionally published forms. Not only are these articles read more widely, they are cited much more often, and thus being incorporated into further research over time. In other words, the open access of this material makes it more useful to other researchers, and the faster it is available, the more useful it becomes.

I urge adoption of open access for all publicly funded scientific research in the United States to increase the return on this investment. The NIH and PubMedCentral is an excellent model to be applied much more broadly and the investment NIH has already made in creating an infrastructure for open access can be leveraged for other science areas. This requirement should be for open access with rights to re-use articles fully in digital form to maximize the value of the public investment in scientific research. I strongly urge that such open access placement carry appropriate licensing for re-use such as Creative Commons CC-BY which are compliant with the existing copyright law.

An alternative to a federal repository for this research could be a distributed archives involving institutions such as ours with an infrastructure to support such a system, so long as the system allows for access and use conditions that allow all interested parties to build on them as opposed to dark archiving this material. I am confident that Pittsburgh and many other research universities with extensive experience with these kinds of repositories would be more than willing to help develop a distributed archive system.

Finally, public access policies should ensure the requirements for open access of federally funded research be uniform across the government funding agencies and follow current best practices with regard to metadata, protocols, integration with things like grant management systems and assessment.

Publishers recoup the cost of publication and dissemination of research articles with a few months

of their publication. Libraries are the primary market for these journals and we all pay for subscriptions to them in advance. So the argument that a publisher needs one year or more before an article appears in a repository or is open to use in the repository is a highly questionable argument. Publishers do not make their money on archived journal articles, but on subscriptions. Open access in medical research has been in place now for several years with no negative impact on the sale of commercial journals in medicine. Any loss of revenues they might have experienced were much more like due to libraries having to cancel subscriptions because of the rising costs of journals coupled with reductions in budget support being experienced widely in higher education.

Again, I urge adoption of open access to all publicly funded scientific research.

Sincerely,

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