

Subject: OSTP Requests for Information on access to scholarly publications and data

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I am very concerned about the RFI that was posted in the US Federal Register surrounding "Open Access". At risk is serious compromise in the peer review system that is a principal safeguard for the vitality of our national biomedical research enterprise. While the peer review process is costly, the financial responsibility is primarily borne by publishers, thereby maximizing availability of funding for direct support of investigation. As a scientist with a large federally funded research program, I fully recognize and appreciate the importance of peer review and consider the protection of copyrighted publications as indispensable.

Open access can negatively impact on the capability of independent publishers to remain solvent. Beyond deterioration in the rigorousness of peer review, open access can have broad economic impact. The financial consequences can extend to scientific organizations that rely on copyrighted research publications as a key and rate limiting component of financial stability. In the current economic climate, the income generated from copyrighted publications cannot be overstated.

I am confident that enhanced mechanisms can be put in place for open access accessibility to research findings from federally supported programs without jeopardizing copyrighted publications. This position is directly supported by a series of ongoing initiatives, which are in part supported by publishers, to disseminate research findings in a responsible and timely manner. Equally relevant, approaches are being developed to translate complex research findings into formats and language that are accessible to both scientists and the general public.

I strongly urge retention of copyright protection and retention of intellectual property rights as a critical safeguard for the biomedical research community and the public, with the understanding that there are substantial economic implications.

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