Subject: **Comment on Public Access to Scholarly Publications**
Date: December 8, 2011 6:44:14 PM EST

Dear Task Force on Public Access to Scholarly Publications:

On behalf of the J. Willard Marriott Library at the University of Utah, we submit the following comment. Thank you for providing this opportunity.

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Rick Anderson, Associate Dean for Scholarly Resources & Collections, J. Willard Marriott Library
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Public access to scientific literature remains essential for our knowledge economy. Seamless, web-based access to scholarly publications maximizes the return on government investment in research, enables economic development, and benefits the tax payer. The increased productivity and drive for scientific innovation necessitates a slight shift in the research infrastructure. As information has rapidly become networked and digital, how it gets paid for and made accessible needs to come into the digital age as well.
Studies have shown that most academic researchers look for scholarly journal articles using the Web.[1] Access to the article depends on what the researcher's campus library subscribes to. Most library budgets remain flat or are in decline while journal subscriptions typically rise at 6-10% annual rates.

While library services such as journal subscriptions and interlibrary loan seek to meet research needs, non-availability still impacts researchers as they search for articles on the web.[2] Many of them abandon the article, email the author or hope that someone has publicly posted the publisher's PDF version for free usually at the detriment to a publishing agreement. This fragmented model makes searching onerous, inefficient and it works outside the legalities of the current system.

Question 1
Agencies could improve scientific productivity by pushing to make final, peer-reviewed versions of the research write-up publicly available. While this may not grow new markets, it will certainly improve the fragmented system described above. As researchers conduct theirweb-based literature search, they can click through to the relevant article no matter if their library has a subscription and without having to rely on extra steps such as interlibrary loan or emailing the author.

In terms of growing new markets, agencies can expressly support this by means of dedicated funding lines. We envision a model where the government supports not only the original research, but a certainlevel of the production and dissemination that allows publishers and librarians to collaborate for the benefit of the researcher and the reader.

For every $1 spent on conducting research, another $1 needs to be allocated for making the results widely and freely known to tax payers as well as those who benefit the tax payer--nurses, physicians, educators, entrepreneurs, social workers, engineers, demographers, scientists, land managers and the like. The scholarly communication infrastructure already exists to support the production, distribution,

attribution, and preservation of publications, but the funding mechanisms need improvement.

Question 2
As noted above, many authors post the published version to open websites despite the publishing agreement and many researchers rely on this when searching for articles on the web. As original creators, authors tend to see articles as their own intellectual property and the traditional transfer of rights to publishers becomes a mere formality. Intellectual property terms that come more in line with established perceptions and normative practices would make for a less fractured system. In a 2006 study, researchers found that most authors preferred to retain their copyrights and allow for any non-commercial reuse.[3] By means of Creative Commons licensing, authors can express such desires without government agency involvement.

Question 3
Health sciences researchers and librarians know to start any life science-related search in the National Library of Medicine's MEDLINE database. It is the one place anyone can go for relevant literatureand, could be argued, a driving force behind the rapid growth of biomedicalresearch. Without a national library of science, engineering, or education such disciplines are somewhat at a disadvantage when it comes to information access because there is no centralized index. However, with an index comes the expectation of full access to the related text and agencies may not be equipped with this expertise. Decentralized approaches, in this respect, may be a better approach. Academic and research librarians distributed across institutions of higher education have such expertise.

Question 4
It is interesting that publishers' archives are noted, but many archives of journals exist in libraries or are held by third parties on behalf of libraries and publishers. Often other related researchmaterial is held by institutions and the responsibility for archiving and stewardship rests with these institutions, not publishers. This information could be more creatively linked and combined than at present. But in so doing theneed to ensure that anything that has been publicly accessible and open to use remains. Having more open article access would facilitate these linkages and recombinations.

Question 5
Access points such as title, author, source, and subject are basic essentials for bringing together a range of information products. Using well-established schemas and controlled vocabularies further the goal of interoperability and cross-searching. For example, the NationalLibrary of Medicine employs bibliographers to describe items and assign appropriate terms from the list of medical subject headings. Agencies wouldneed to use similar approaches.

Question 6
In order to account for differences in disciplines, allow authors to choose their specialized publisher, but give them express budget lines in grants for supporting the costs of publication and archiving. The funds would support publishers as they facilitate the production of discreet, citable scholarlyobjects (either articles or data sets) with equal amounts of support going to libraries by means of increased university facilities and administration rates for maintaining persistent access and/or supporting publication costs. Publishers and librarians have already partnered in this area with such initiatives as the Compact for Open Access Publishing Equity and, of course, PubMed Central. However, such partnerships are not yet systematic across federal agencies and stakeholders and a dedicated budget line would incentivize wider collaborations and potentially spur new business opportunities especially in terms of data publishing.

Question 7
Yes.

Question 8
The answer to the question regarding an embargo period is probably best tied to the nature of the various disciplines and how timely access and repurposing of information needs to be. For example, early access to scientific and medical information is critical. A parent who is seeking authoritative and current information to make a decision regarding the medical treatment of achild has an immediate and urgent need. Although you ask for empirical evidence, the question also goes to value and the insurance of long term and open access to the fruits of research. Libraries are one of the great equalizers in societies worldwide and library budgets are increasingly under extreme pressure due to publisher policies and pricing strategies. Nevertheless, and even in an environment of openly available research, libraries will need toacquire and preserve definitive versions of research, usually produced in the form of formally published journal articles and books. On the empirical side, there has been no evidence that demonstrates that public access policies and short embargoes periods have negatively impacted library subscriptions.

[1] Bradley Hemminger, et al. Information Seeking Behavior of Academic Scientists. Journal of the American Society for Information Science & Technology. February 2007. http://ils.unc.edu/bmh/pubs/Information_Seeking_Behavior_of_Academic_Scientists-JASIST-2007.pdf
[2] Research Information Network Report. How researchers secure access to licensed content not immediately available to them. December 2009. http://www.publishingresearch.net/documents/RINOvercoming-barriers-report-Dec09.pdf

[3] Esther Hoorn and Maurits van der Graaf. Copyright Issues in Open Access Research Journals: The Authors' Perspective. D-lib Magazine. February 2006 http://www.dlib.org/dlib/february06/vandergraaf/02vandergraaf.html