

**Subject: Response to RFI**

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Public access to federally funded research is an important issue. However, the issue of "access" to research and published manuscripts that may or may not be directly related to federally funded research is a one that is adequately and appropriately addressed in the current marketplace. Indeed, authors and researchers have access to a wide collection of peer reviewed publication venues in the current market (including open access). As such, authors select journals based on their desired audience and any policy that limits the ability of researchers to select a journal (or dissemination format) arguably infringes on academic freedom. In my own experiences, I have published in open access journals (highly competitive journals) and done so with the specific intent of reaching a "different" audience. I also--and more regularly--publish in venues associated with global content providers such as Elsevier, Taylor & Francis, Wiley-Blackwell, and so on. I select these journals as they have sophisticated infrastructures that ensure the research reaches a target audience. Additionally, the quality of their product and their review processes are outstanding. Unfortunately, open access/public access venues seldom have these infrastructures and/or the resources necessary to invest in such infrastructures. As such, the major publishers play a critical role in the actual dissemination of research and their resources/infrastructures (which include partnerships with university and public libraries) ensure visibility. Similarly, major publishers continue to innovate and push the boundaries of research dissemination and electronic publishing.

Additionally, the boundary between "research" and "publication" is an increasingly blurry one insofar as research is often highly collaborative and often does not conform to research performed within a specific "time frame" outlined in a single grant or funded project. Insofar as knowledge is incremental and accrues over time, determining what portion of article X is a by-product of grant Z is highly problematic.

In the end, any effort to limit the markets associated with peer reviewed publications--while cloaked under the noble guise of public access--will harm knowledge industries; create confusion over definitions of "funded" v. "not funded" research; reduce the visibility of important research; and arguably stunt innovation across the publishing sector (i.e., limit the overall competitiveness of content providers/publishers). If authors want a "public option", they will create it and currently have access to such markets. Let the markets work.

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