

**Subject: [Federal Register Volume 76, Number 214 (Friday, November 4, 2011)]**

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As the Editor-in-Chief of Neurobiology of Disease (Elsevier; 2010 Impact Factor 5.1), I am writing in response to the Request for Information.

First, in my role as a federally (and non-federally) funded researcher who has worked at several academic medical centers, I do not believe there is a significant problem in public access to research reports that result from federally funded research. I have never heard this complaint, except when someone wants access to an article in a very obscure journal. This personal impression is supported by a recent survey (Access vs. Importance, A global study assessing the importance of and ease of access to professional and academic information. Phase I Results. 2010. Publishing Research Consortium [http://www.publishingresearch.net/documents/PRCAccessvsImportanceGlobalNov2010\\_000.pdf](http://www.publishingresearch.net/documents/PRCAccessvsImportanceGlobalNov2010_000.pdf)).

Second, in my role as a journal editor, I point out that the main purpose of a scholarly journal is to report on original research or experimentation in order to make such information available to the global research community. Authors, editors, publishers are committed to providing the broadest possible access to our publications. Our goal is to expand access to the latest breakthroughs in the scientific research and developments in academic thought. Further, one of the metrics of a successful journal is the rate at which its articles are cited. Clearly, our articles must be accessible for them to be read and cited. Thus, we have an interest in ensuring adequate accessibility.

From my experiences at Neurobiology of Disease and other journals and with other publishers, it is clear that publishers are committed to indentifying any gaps in access and have developed a number of mechanisms to close gaps in sustainable ways. This includes initiatives to broaden access for researchers in developing countries, patients, and the public.

Lastly, I point out that it requires considerable investment to maintain the highest standards for peer-reviewed scientific publication and sustainable mechanisms are required to enable this system to cooperate with current and future mandates. As such, I would urge that any effort by the government to establish policies for peer-reviewed research should be done in consultation and partnership with all affected stakeholders, ensuring that such policies do not undermine the sustainability of the peer review publishing system, which is necessary to maintain the quality and integrity of scientific research.

Respectfully,

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J Timothy Greenamyre, MD, PhD  
Professor & Vice-Chair of Neurology  
Director, Pittsburgh Institute for Neurodegenerative Diseases  
UPMC Endowed Chair & Chief, Movement Disorders  
University of Pittsburgh