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Comment 1

The complete collection of articles resulting from publicly funded research should be made freely accessible, so that the public can fully use them – (i.e. text mine, data mine, compute on them, create derivative works) without commercial restriction. Enabling full reuse of these articles enables innovative individuals and companies to construct new services and new products on publicly funded content. Open Access allows more users to stay on top of cutting-edge ideas and generate new uses and application for this research. Faster commercialization spurs economic growth, creating new jobs across broad sectors of the economy from the biotech sector to agriculture to energy to publishing. This is key for the economic growth of Nebraska.

Further, open access to research articles is a critical driver of scientific innovation and productivity. It:

- Increases citations and follow-on research
- Promotes diversity in follow-on research
- Increases the pursuit of new research pathways
- Encourages faster application of research

It opens up vast, previously unobtainable new research pathways, making new connections possible.

Information from Houghton reports shows that the benefits of an open-access policy similar to that of the NIH policy are estimated at approximately 8 times larger than the costs; the net present value gains of expanding an NIH-style policy to all other U.S. science agencies is estimated to be on order of \$1.5 billion (net costs of running archive); and of that figure, approximately 60% is estimated to accrue directly to the U.S. economy. An effective, government-wide public access policy can be implemented in cost-effective manner by leveraging existing infrastructure to minimize unneeded duplication of efforts; utilizing the investments already made by the NIH with the annual operation of PMC; and supplementing existing access points with additional manuscripts which incurs only small incremental costs.

Enabling full reuse means we can do more with less; we don't have to duplicate research to be able to build on results, and we can continue to extract value from our initial investment for years to come.

Comment 2

Public access policies can be successfully implemented by respecting and working within the current copyright framework. The NIH policy currently allows uses of articles currently provided for under "fair use." Greater utility is needed for potential scientific and commercial benefit of this information to be fully realized. A useful strategy to consider to balance the interest of all stakeholders would be to take a stepped approach: First, provide an appropriate period of embargoed access where current, fair-use only rights apply; and second, after the expiration of the embargo period, provide full reuse right to the public under an appropriate open access license.

Comment 3

The federal government is the appropriate entity to provide permanent stewardship of these articles, and is in a unique position to ensure that publicly funded articles are permanently preserved, made accessible, and useable. To ensure this, any public-access policies that are developed must give the

federal government adequate rights to archive and distribute publicly funded articles. The federal government should, at a minimum, maintain an accessible, mirrored version of all content. Federal stewardship is cost-effective. NLM reports PMC costs less than 1/100th of one percent of HHS's operating budget to run. Simply providing government with a copy to put in a "dark archive" is not a viable solution; without regular access/use, archival veracity cannot be ensured. Library experiences have shown that regular access/use of digital materials is a crucial element in effective long-term preservation.

Comment 4

Publishers are one player that might be encouraged to participate in public/private partnership by providing approved repositories that meet conditions for public accessibility, use rights, interoperability and long-term preservation of publicly funded articles. However, none of the 50+ research funders who currently have public access policies are using publisher sites as the final archives. However, there are good examples of funders partnering with academic and research institutions in this role. Programs such as Hathi Trust provide a model for the deposit and preservation of digital information and provide an open access platform for this research.

Comment 5

No comment

Comment 6

For any public-access policy to be successful there must be consistency of requirements and mandates. Institutions often have researchers who hold grants from multiple agencies concurrently. Uniform requirements and procedures regarding deposit of peer-reviewed literature should be established across all funding agencies. Uniformity of deposit requirements will reduce the complexity and cost while, at the same time, increasing the rate of compliance. Effective implementation strategies for public-access policies can help maximize returns to taxpayers by ensuring that complete results are widely available in a timely manner. Policies can create opportunities to create/enhance productivity management tools for federal and internal reporting.

Comment 7

No comment

Comment 8

Immediate access is the ideal time to optimize scientific and commercial utility of information contained in these articles. However, to accommodate those journal publishers who continue to rely on subscription income, an author-determined embargo period of 0-12 months has proven effective across multiple disciplines. No data has been provided by any publisher that this embargo period (currently in use by NIH and numerous other funders around the world) has harmed them. Even publishers who previously expressed concern that opening access to back content to result in loss of revenue have now changed practices. All of these market conditions regularly contribute to journal cancellations and must be accounted for so that the effect of an embargo period can be adequately isolated.