

**Subject: Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research**

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I am a federally funded biomedical researcher working at a research oriented medical school. Therefore my answers reflect my own experience publishing NIH funded research.

QUESTION 1: Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research? How can policies for archiving publications and making them publically accessible be used to grow the economy and improve the productivity of the scientific enterprise? What are the relative costs and benefits of such policies? What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

COMMENT: I believe that the results of all federally funded research should be freely and readily available to the public. The current NIH policy of making peer-reviewed articles available to the public after 1 year tries to strike a balance between providing accessibility to the public and maintaining an economic incentive for publishers. However I personally believe a full year delay for public access is excessive (although I understand the logic behind this delay). The problem is that a one year delay produces an uneven information playing field for the american public during the most critical period for acting on the results of federally funded research.

QUESTION 3: What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

COMMENT: I believe that it is essential that the government maintain a centralized repository of all peer-reviewed publicly funded research. With the rise of digital-only journals there is a real risk that failure of any commercial publisher could result in the loss of important research results that had been generated with public funds.

QUESTION 4: Are there models or new ideas for public-private partnerships that take advantage of existing publisher archives and encourage innovation in accessibility and interoperability, while ensuring long-term stewardship of the results of federally funded research?

COMMENT: It is my impression that commercial publishers are currently leveraging their archives to force libraries into financial arrangements that are one sided and unjustifiable. This may be good business for the publishers but it is predatory, especially since most of the content that libraries are being forced to buy (so they can continue to do their job) was paid by taxpayers. This is unacceptable. I suggest that any embargo period be made conditional to the release to the public domain of the publisher's archives and include a sunset clause for any

embargo period. agreed upon

QUESTION 7: Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

COMMENT: Yes

Thank you for the opportunity to comment on this important issue.

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