

Subject: public comment on access to publications from government funded research

Date: December 29, 2011 4:37:58 PM EST

Comment 1 Openly accessible federally funded scientific research broadens the ability for everyone involved in the scientific enterprise to build upon emerging thinking rather than limiting access to those scientists working for organizations with the means to pay for access to current information. This levels the playing field enabling start-ups and smaller scientific organization to contribute new products and grow the economy with the reinforcing effect of improving productivity by facilitating the exchange of information. A fully informed scientific community is then able to work faster and more efficiently to bring new products to market and more quickly. This can be achieved at a relatively low cost to benefit ratio given the infrastructure already in place at NIH with PubMedCentral. In the field of academic research, for example, immediate access is currently limited to those resources an institution can afford and choices are constantly made between supporting one academic discipline or another. Open access solves that problem by opening up information from all fields of research supported by the federal government and encourages interdisciplinary research by making resources equally available regardless of discipline.

Comment 2 At the most basic level, federally-funded scientific research belongs to the American public. The current system has been perverted in a way that enables commercial publishers to own the copyright to work done by federally-funded academic scientific researchers. Universities then have to purchase the work done by their own researchers that was funded by taxpayers. Universities have to convince their researchers to insist that their peer-reviewed work belongs to them and not the publisher of their work. Public access policies don't undermine intellectual property rights if they are carried out within the existing copyright framework.

Comment 3 – It makes a lot of sense for the federal government to create one approach for managing publicly access to peer-reviewed scholarly publications that result from federally-funded research. It reduces costs by “solving the problem” once and the federal government is the most stable institution in terms of ensuring that the research it has funded remains permanently accessible and usable. Even if the government required a private entity to ensure permanent access in reality commercial entities go out of business and the government would be left to “solve the problem” again.

Comment 4 – Public-private partnerships might be used to encourage innovation, but it should be clear that ultimately the contents of the archive are government property is the research was federally funded. Archives such as LOCKSS and Portico developed by non-profits are a more likely partner in archiving.

Comment 5- The metadata standards in effect at the time should be utilized to encourage interoperable search, discovery, and analysis capacity across disciplines and archives. The public should be able to access publications using commonly practiced search techniques and access points. Federal agencies should require authors to include acceptable metadata at the same time their work is deposited in the archive.

Comment 6- Burden and cost can be minimized by developing uniform standards and requirements across all federal funding agencies. Benefits will also be maximized by providing the public uniform searching and access tools to facilitate use of the peer-reviewed literature.

Comment 7 - Book chapters and conference proceedings that derive from federally-funded projects should be made publicly accessible.

Comment 8 - Philosophically, because federally funded research

belongs to the public, there should not be an embargo period. In the interests of those journal publishers who rely on subscription income, either a six or twelve month embargo seems to allow those publishers to maintain enough of their subscription base. I am not aware that any bioscience journal publishers have gone out of business since NIH instituted its public access policy, for example. Different embargo policies across different agencies don't make sense unless faster public access to information in a particular field can be demonstrated to stimulate the economy as a result. In our case, our journal inflation in FY 2011 averaged 5 % and our collections budget was reduced 1.5% and our inflationary increase was suspended. This translates to our faculty having access to about 6.5% less federally-funded literature in fields where open access is not a condition of the award.

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