

Subject: responses to RFI

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Responses to Request for Information, as in

<http://www.gpo.gov/fdsys/pkg/FR-2011-11-04/html/2011-28623.htm>

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Comment 1:

An important step that agencies can take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research is to cooperate closely with authors, editors and publishers.

Authors, editors, publishers are committed to providing the broadest possible access to publications. The goal of responsible authors, editors and publishers is to expand access to the latest breakthroughs in the scientific research and developments in academic thought. The policies of archiving publications and making them publically accessible have tremendous benefit on the economy and the productivity of the scientific enterprise. The most beneficial type of access is electronic online access. The cost of these policies can be kept small if public access policies take into account the considerable investment to maintain the highest standards for peer-reviewed scientific publication and the sustainable mechanisms to enable this system to cooperate.

It is critically important that any new policies do not damage the publishing institutions on which the Federal Government and science depend.

Comment 2:

The specific steps might include an appropriate amount of time interval between the appearance of scientific discoveries at scholarly journals and their archived public access. Federal funding budgeted for the public access policy should also account for the cost to the publishing institutions.

Premature and uncontrolled public access risks endangering the incentives of authors, editors and publishers to produce cutting-edge scholarly discoveries.

Comment 3:

In the presence of private information and potential incentive incompatibility, a decentralized approach has the benefit of using a price system to align incentives

and to aggregate information. Incentive compatibility and information aggregation in a centralized approach requires a well-designed mechanism that can be difficult to achieve. A centralized approach has the benefit of being able to account for positive externalities that can not be endogenously incentivized based on private costs and benefits in a decentralized system.

Comment 4:

Better public-private partnerships can be achieved if any effort by government to establish policies for peer-reviewed research is done in consultation with all affected stakeholders, ensuring that such policies do not undermine the sustainability of the peer review publishing system which is necessary to ensure the quality and integrity of scientific research.

Public and private research universities are also an indispensable part of the system for promoting universal and public access to scientific and scholarly inventions, discoveries and publications.

Comment 5:

The National Science Foundation and public and private universities can play an important role in promoting interoperable search, discovery and analysis capacity across disciplines and archives. There are scientific and mathematical principles and foundations that are common to many different disciplines. Federal agencies can play an active role in fostering the establishment and development of such higher level disciplines and studies that provide common infrastructures to various subjects of studies.

Comment 6:

Federal agencies that fund science can better maximize the benefit and minimize burden and costs by providing more transparency in the funding outcomes and providing funding distributional summary statistics across disciplines and institutions and individuals awardees.

Comment 7:

Book chapters and conference proceedings can also be covered by public access policies.

Comment 8:

The appropriate delay period should depend on the cost and benefit analysis of individual publishers. Federal agencies should take the cost of publishing institutions into account when early public access is determined to provide more

public externalities than private costs.

In general, overall access to research articles is good, particularly in the United States, where 97% of researchers are happy with access to journal articles: see 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.

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