Subject: **COMMENTS ON PUBLIC ACCESS TO SCIENTIFIC JOURNALS**
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COMMENTS ON PUBLIC ACCESS TO SCIENTIFIC JOURNALS

I offer these comments as the current editor of a science journal and a retired scientist from a major government agency. In my former career, I managed a large government science website and was a member of the founding team for the Science.gov website. My comments reflect this unique perspective.

I believe current open-access proposals are flawed because: (1) the public's need for full-access science articles is not well established; and (2) the proposed business model of free access is infeasible in terms of completeness and long-term support.

1. The public's need for full-access science articles is not well established. Public interest would be better served by requiring Government scientists to provide a lay-audience summary of their work.

I only wish our journal's articles were as popular with the public as open access advocates believe them to be! High demand might allow more economies of scale. Reporting and documenting scientific findings, however, requires including a lot of tedious detail on sampling and analysis the public typically finds uninteresting.

The public is interested in results, not methods. Abstracts already are openly available online. Many journals, including my own, provide open plain-English summaries. Other open services, such as Science Daily (www.sciencedaily.com) report on the most interesting articles. What about citizen scientists who still want to see the full article? Most authors are happy to email a copy upon request, and our copyright agreement permits this. In rare cases where an article turns out highly popular with the public, I have the authority to ask the article be made open access in the public interest.

In short, open-access requirements would meet a need already served by the current system, and, in doing so, would eat into the legitimate, traditional clientele of scientific publications.

2. The proposed business model of free access is infeasible in terms of completeness and long-term support.

The incentive for scientists is publication, not distribution. One senior manager I knew termed this the “loading dock syndrome,” referring to the interest of scientists in seeing their work printed, put on the loading dock, and who cares where it goes from there? Government agencies have been trying for decades, with mixed results, to produce timely and comprehensive listings of their scientists’ output. Directives, cajoling, even discipline threats notwithstanding, experience tells me it will be nearly impossible to assure an agency repository contains a complete collection of all its scientists’ publications.

Especially problematic will be discussions, replies, and errata, which comprise a critical component of the scientific record and often are NOT written by government scientists covered by proposed policies. Failure to distribute errata, or to quickly remove a discredited or fraudulent article, for example, can lead to flawed public policy and even tragedy.

Internet distribution offers great economies but is far from free. Properly maintaining a continually growing online library and keeping up with search technologies and output standards requires a substantial annual budget. Unlike commercial or society publishers, who see transactions as part of a revenue stream, a government repository sees each transaction only as a cost. The business model for an open-access government repository depends upon the activity being valued enough to win continued funding from Congress far into the future. The present political climate leaves grave concern regarding this assumption.

Flawed though its business model may be, a government repository will nevertheless compete with a commercial/society publication model proven viable for over a century. In the worst case, non-government publishers will be driven out of business, leaving distribution of science articles entirely in the hands of the government. This clearly presents grave dangers to freedom of speech and the independence of science.

Speaking from considerable experience with internet distribution, I have little confidence in the government’s ability to operate a successful long-term repository.

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