

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

Date: January 2, 2012 5:00:05 PM EST

I am writing as a researcher at a small non-profit institution who's work is partially funded by federal grants. I would like to express my strong support for Section 103(b)(6) of ACRA and of OSTP and NSTC's efforts to expeditiously implement those goals.

Regarding question 3: A major advantage of there being a public repository of publicly-funded research papers is that papers would not risk being lost if a private entity fails. A public repository might not be the most convenient place to search for scholarly papers, but its existence would be valuable for ensuring survival of the work.

Regarding question 7: At least in my field (planetary science) book chapters and conference proceedings are no different from journal articles in being both peer-reviewed and a crucial part of the scientific literature. Although the publishing business model may be somewhat different from journals, it makes no more sense to deny the public access to these types of scientific publications than to deny them access to journal articles, when taxpayer dollars paid for the work.

Regarding question 8: It seems to me that the shorter the embargo period before the public is granted free access, the better, if the goal is to boost scientific progress. Embargo periods act as barriers to the scientific discussion taking place in the literature, shutting out private citizens and researchers at smaller institutions with limited library budgets. This reduces the number of participants in the most active phase of the conversation, the time immediately after something appears in the literature. It also delays the involvement of the broader community, meaning that the whole scientific enterprise moves more slowly and less efficiently. Of course, full public access after even a non-zero embargo period would be much better than the situation today, where many publicly funded scientific papers never become available to the public who paid for them or to researchers at smaller institutions. Perhaps a compromise could be reached where, in exchange for keeping a modest proprietary period, publishers would open up access to their catalogs of older papers published prior to the adoption of new open-access policies for federally-funded research.

Sincerely yours,

Dr. William M. Grundy