

January 5, 2012

Dear White House Office of Science and Technology Policy Staff Member:

Thank you for the opportunity to respond to the White House Office of Science and Technology Policy's call for public comment on long-term stewardship and broad public access to the peer-reviewed scholarly publications that result from federally funded scientific research.

To paraphrase our Mission and Purposes statement, Williams College understands its own responsibility to contribute by thought and example to the world of higher education. The academic virtues which we value include the capacities to explore widely and deeply, think critically, reason empirically, express clearly, and connect ideas creatively. Our faculty and students are dedicated to expanding human knowledge and understanding through original research, thought, and artistic expression. Our desire to create and disseminate knowledge is not complete if that scholarship is not widely and freely available. We support, therefore, the most timely and broadest possible access to information for our academic community and the community at large.

In addition, we believe that citizens are entitled to prompt and full use and reuse of the results of research funded by our tax dollars. Limiting access to this research, by hiding results behind expensive journal subscriptions, greatly reduces the benefit to society of important research.

(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?

It only stands to reason that, the sooner results of research are disseminated to the widest possible audience without commercial restriction, the better our citizenry is poised to reuse this knowledge in creative ways. Such a step enables individuals and companies to build new products, allows more users to stay on top of cutting-edge ideas, generates new uses and applications, and speeds the launch of new services and products into the marketplace. Faster commercialization spurs economic growth, creating the potential for new jobs across broad sectors of the economy. Such use of taxpayer funded research promotes the best return on our nation's investment, and increases benefits to the economy and to society at large.

(8) What is the appropriate embargo period after publication before the public is granted free access to the full content of peer-reviewed scholarly publications resulting from federally funded research? Please describe the empirical basis for the recommended embargo period. Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence-based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

Immediate access to published research results optimizes the scientific and commercial utility of information, putting new findings into the hands of the broadest possible audience who can use them. As librarians we know that unanticipated users often find creative uses for scholarly information that even authors had not imagined. Minimizing the delay in providing access to newly published research enriches the marketplace of ideas without delay.

However, we know that many journal publishers continue to rely on subscription income to support the dissemination of new content. An embargo period of 0-12 months has proven effective across multiple disciplines. We are not aware of any data provided by any publisher that this embargo period (currently in use by NIH and numerous other funders around the world) has harmed them. Embargos of 12 months or less are the norm in the policies of research funding agencies and institutions around the globe. Embargos of 12 months or less have been adopted by hundreds of journals <http://highwire.stanford.edu/lists/freeart.dtl>

Even publishers who previously expressed concern that opening access to back content might result in loss of revenue have now changed practices. The JSTOR moving wall stipulations set by publishers are routinely decreasing with some even set at no delay before content is accessible. In addition, the Royal Society, publisher of the world's first scholarly journal, recently opened access to their back file of articles with a 12-month embargo period, noting that this prestigious and heavily cited back file, dating back to 1665, accounted for less than one half of one percent of their overall publishing revenue.

Thank you for your consideration.

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