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Comment 1 Making access to federally funded research so expensive that only a privileged few can afford to read the results limits scientific progress and economic development. Open access creates a business climate where the private sector can more easily leverage public research and invest in and develop new products and services. Immediate open access without restrictions to federally funded research provides the private sector with access to research results. In today's web environment, it is far simpler, and thereby more efficient, to discover research that has already been conducted than it is to redo research that has already been done.

Comment 2 Copyright resides with the author until the author shares or surrenders those rights, usually to a publisher. Publishers require the right or permission to distribute publicly funded works through publication, for a period of time. Authors of federally funded research should retain other rights to meet their own teaching and research obligations, and in order to make their work available open access.

Mechanisms to enable full use (i.e. distribution, reuse, text mining, data mining, computation, etc. to aid in access to and reuse of research) should be part of a federal government public access policy. This can be accomplished by implementing appropriate licenses such as Creative Commons CC-BY licenses that are enforceable under current copyright law.

Comment 3 A successful centralized approach requires financial, technical and political commitment. Often, these three components are difficult to bring together in a timely and efficient manner. Decentralized approaches emerge because of this challenge. Local efforts to archive and provide access to federally funded research results develop from local needs. At Oregon State University, the Libraries receive requests from users internal and external to the university for publications that are difficult to find and expensive to acquire. College deans want better means of tracking faculty productivity and researchers desire legitimate means to archive their finished products. OSU is not unique in demonstrating the desire for easily accessible digital repositories that clearly indicate who is responsible for their long-term maintenance.

Decentralized repositories do not preclude a centralized approach. Multiple copies, at times messy, are a proven means of preservation. If one repository has technical problems, another can fill the gap. Access is improved by having multiple "vendors." This provides users with a choice. Systems may find some copies more easily than others depending on location and format. Analytic tools are more problematic in a decentralized system as item usage is currently system specific.

The use of private repositories is problematic if they are the only source. Users are dependent on corporate policy for access and corporate management for

preservation. A blended system of federal, institutional and private systems seems the most feasible and possibly reliable.

Comment 4 One of the most viable models is the creative use of embargoes. Publishers retain rights to control access to publications for the initial three to six months after publication, and then institutional and federal interests can ingest those publications for public access. This allows the publishers time to reap the economic reward of their investment while relieving them of the need to provide perpetual preservation and to develop public interfaces beyond what the more sophisticated user needs. The linkages among public and private archives could enhance usage of both.

Comment 5 Federal agencies, publishers, and or scholarly and professional societies should work together to "develop robust standards for the structure of full text and metadata, navigation tools, and other applications to achieve interoperability across the literature, taking international standards into account." Federal agencies should work with organizations and stakeholders "that have cyber infrastructure programs to develop a multiagency program supporting research and development to expand interoperability capability." To achieve maximum interoperability and reuse of the research record, distributed database providers must work in concert with agencies and organizations, such as PubMed Central, that have developed robust internal operability technologies.

Comment 6 Effective communication and use of technology will help maximize the benefits of access to publicly funded research. As the funders of the research, taxpayers likely already expect to have access to the results of the research conducted, even though this is not currently the case.
The burden of a public access policy is relative, and the concept of minimizing it overlooks the significant burden that is currently experienced by many of the stakeholders.
• Awardee institutions may wish to share the original scholarship produced by their faculty and other researchers with alumni, donors, and recruits in marketing and recruiting efforts. For institutions with Land Grant status, this is part of their duty to disseminate research findings to the citizens of the state they serve. The burden of a policy that supports this dissemination would be in ensuring the requirements of the grants are followed.   This burden could be lessened by creating a simple compliance structure that is easy to understand and implement by institutions receiving grants and the authors of the grants.
• For scholars conducting research at an institution, they sometimes find that they cannot access the work of their peers as easily as the Internet could allow (and ironically, sometimes they can't access the published copy of their own works). Frequently, time is wasted while colleagues use informal networks for sharing documents, rely on their institution's interlibrary loan services, or simply go without. The burden for scholars to follow through on their commitment to make their work publicly accessibly would be minimal. Many faculty (or their staff) already post citations to their works on professional or personal websites and record their research activities in their dossiers and departmental reports. Uploading documents and providing some metadata to their publications

would be a small extension of activities already taking place.

- The current lack of coordinated dissemination of publicly funded research is more of a burden to federal agencies and libraries than putting a model in place that allows better collaborative efforts and cost savings. Unique repositories exist that are already meeting the spirit intended in the concept of free access to publicly funded research. These efforts however are kept from being fully effective by the publisher-controlled restrictions on access such as variations in the versions (if any) that can be made available, and varied embargo periods. Simplification through national policy would streamline a good process already under way, making the work more uniform and manageable.

- Following the PubMed Central example, publishers could opt to participate in compliance by helping authors place their work in appropriate online repositories, which would likely be a minimal cost relative to overall profits. The primary burden to publishers will be in the form of loss of revenue. However, academic institutions have been experiencing a loss of buying power for decades to support ongoing publisher profits. Perhaps this is a burden that should be more fairly distributed between publishers, libraries, institutions of higher education, and other stakeholders.

Comment 7 Public access policies should provide unfettered access to **all** peer-reviewed publications, including book chapters, conference proceedings and any other peer-reviewed work that might result from federally funded research. At Oregon State University we know research results can take many forms; all publications add value to the scholarly discussion, and it is just as easy to provide access to alternative forms of publication as it is to provide access to journal articles.

However, policies under which **educational materials** (such as book chapters, texts, and conference proceedings) are made accessible **may need to differ** from those directed at journal articles. Different conditions apply to different types of materials (i.e., authors of journal articles are not paid while textbook authors may be remunerated for their work) and policies should reflect these differences.

Comment 8 No publisher has indicated that the NIH embargo period policy has harmed them financially. And, except in the case of the NIH public access policy, only publishers currently make decisions about the length of embargo periods, not the disciplines or taxpayers or the government on their behalf. Authors accrue no benefits from embargoes; we have never heard an author say "I wish my article was not available."

A definitive statement from the government is needed that says all publications resulting from publicly funded research data must be freely available to the public via a persistent link on the Internet. A federal standard could be set for a reasonable lag between publication and availability in an open access repository which researchers could then quote to publishers when assigning their copyrights, rather than allowing the publisher to make this choice against the public interest -- which is now the case.