

Subject: Public access to peer-reviewed scholarly publications

Date: January 9, 2012 10:26:36 AM EST

Dear Science and Technology Policy Office,

Thank you for extending the comment period on **Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research**. The Research Works Act has only very recently come to the notice of most of us in the scientific community, and it is because of this extraordinary proposal that it is now apparent to us that we need to reaffirm what we thought was once settled.

It should go without saying that scientific work funded by the public should be **freely accessible** to the public. I do not understand how this is even a matter for discussion. The public pays for the research; the public should benefit in every way possible, including access to work once it is published.

The language in the RWA is overly complicated and often misleading, attributing to publishers far more involvement in the scientific process than they really have.

The truth is that scientists (whether funded by public or private money) provide the many hours of underlying research, the writing and the figure preparation that result in a manuscript that is submitted for publication. Other scientists then provide the editorial services and (contra publishers' claims, as can be easily verified) the peer review. In most cases, these editorial and reviewer services are provided to publisher gratis, and involve many more hours of work by the peers of the author submitting the manuscript.

Publishers' contributions are limited essentially to formatting the manuscript, the provision of web hosting, and sometimes (rarely) a very limited amount of compensation for senior editors only (usually not the handling editors who actually deal with authors' works). The notion that such a minor contribution should suffice to hand publishers, rather than the public, the right to determine how, where and under what limitations the resulting works are disseminated, makes no sense at all.

Regards,

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