

January 9, 2012

U.S. Office of Science and Technology Policy  
Request for Information: Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research  
Docket number OSTP-2011-0023  
publicaccess@ostp.gov

Office of Science and Technology Policy,

The following comments are in response to the December 23, 2011 Federal Register notification (Vol. 76, No. 247, p. 80418-80420) inviting public comment on the “Request for Information: Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research”.

Question 1 comment

I believe federal agencies need to work as a group to set a common embargo period for federally funded scientific research that recognizes the value that non-profit and for-profit publishers contribute to the publishing enterprise. If the established embargo is too short the publishers will no longer be able to contribute continuing value to the scientific publishing enterprise.

I would suggest that there be a transition period to allow both non-profit and for-profit publishers to adjust their business models in an orderly and efficient manner.

Question 3 comment

I see little value in insisting upon one single centralized repository of federally funded scientific research. However, it may make sense for a consortium of federal agencies to work with non-profit and for-profit publishers to insure that in the case of insolvency that a collection of federally funded scientific research can be efficiently migrated to other repositories.

Question 5 comment

I'm glad to see awareness of the need to have a common set of metadata to allow optimum search and discovery across different structures. I believe the Dublin Core Metadata set serves as a good core of needed metadata. There would be the need to add enhancements to provide unambiguous tags for journal title, volume, issue, and page numbers. There could also be instances where additional alias tags are needed to broadly address all the various search engines that serve internet users.

I believe a consortium of federal agencies need to partner with major organizations that hold federally funded scientific research to insure that publically accessible information can be readily located. Many such organizations are using DOI (digital object identifier) which can provide a continuing link to published information.

I think there also needs to be consideration to ensuring that the actual content of published federally funded scientific research can be searched. For example that legacy PDF files were created with optical character recognition (OCR).

#### Question 7 comment

For book chapters the challenge is that such books are created to achieve income for the publisher, whether a for-profit or non-profit, and in chapter contributors are recognized through providing free copies of the resulting book. As well books are expected to return income over a longer time frame than journal publications. The result will be that application of public access policies to book chapters will diminish the incentive for such book publishers to include chapters from federally funded research. At best I believe an embargo duration of ten years should be considered.

For conference proceedings I believe there is a greater potential to partner with hosting organizations to make such content available. For example, I'm associated with a small conference that is interested in making its legacy content available and searchable and would likely welcome a content hosting resource. As conferences are more recently starting to share conference content through a number of different means, e.g. powerpoint + audio; video recording, etc, the model is more under development. Given the newness of making such content available I believe there is much more potential for partnership with sponsoring federal agencies to make such content available per public access policies.

#### Question 8 comment

My personal opinion is that there should be a one year minimal embargo period to help assure the continued viability of non-profit publishers of scholarly content. I believe these publishers contribute significant value in the peer review process that is applied to such scholarly content. The

#### General

It is admirable of the involved federal agencies to insure public access to federally funded scientific research. However, I would also like to point out that the National Technical Information Service charges for many of the publications it offers. These publications are as well the result federally funded scientific research. So I would ask that the same be expected of federal agencies as is envisioned of both non-profit and for-profit publishers.

Sincerely yours

Mr. Donovan Porterfield  
Los Alamos, NM 87544