

Hello,

in response to the RFI on "Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded 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?

The first step to growing the intellectual market is to allow publications to be distributed and easily read by those who are interested. Today, this primarily means making scientific papers readily available on the Internet.

Policies that encourage making data and results freely available will be highly beneficial. These might include clear statements that paying open access publication fees are allowable budget expenses, while charges for journals that are not open access are not allowable expenses.

The costs are to develop new business models for publishing scientific papers. The model of journal subscriptions may no longer be appropriate for the Internet age.

(2) What specific steps can be taken to protect the intellectual property interests of publishers, scientists, Federal agencies, and other stakeholders involved with the publication and dissemination of peer-reviewed scholarly publications resulting from federally funded scientific research? Conversely, are there policies that should not be adopted with respect to public access to peer-reviewed scholarly publications so as not to undermine any intellectual property rights of publishers, scientists, Federal agencies, and other stakeholders?

It is not clear to me what the intellectual property interests of publishers are, as they are generally not the originators of scholarly information. On the other hand, it is clear that they have legitimate financial interests, and part of the way they have traditionally made profit is by requesting scientist to transfer their intellectual property rights. Thus, it is very important that we keep distinct profit motive and intellectual property particularly with regard to publishers.

(3) What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

Managing public access to research results is largely a solved problem. The ability to find new research findings has never been better. Federal agencies might want to retain copies of published content for their own internal bookkeeping, but there isn't a clear reason to think that this is a preferred solution to archiving the scientific literature.

(4) Are there models or new ideas for public-private partnerships that take advantage of existing publisher archives and encourage innovation in accessibility and interoperability, while ensuring long-term stewardship of the results of federally funded research?

Perhaps one of the best examples of a public-private relationship that has expanded our ability to get to existing archives has been Google Scholar. There, it was important that publishers digitize their archive and make it machine searchable.

(5) What steps can be taken by Federal agencies, publishers, and/or scholarly and professional societies to encourage interoperable search, discovery, and analysis capacity across disciplines and archives? What are the minimum core metadata for scholarly publications that must be made available to the public to allow such capabilities? How should Federal agencies make certain that such minimum core metadata associated with peer-reviewed publications resulting from federally funded scientific research are publicly available to ensure that these publications can be easily found and linked to Federal science funding?

Encouraging scientists to publish data sets, particularly large data sets, in a readily downloadable electronic format would be useful. Perhaps one of the important pieces of metadata would be as simple as an identifier that would never change, similar to DOI numbers for publications. That way, even if the location of the archive changed, the archive would still be identifiable and findable.

(6) How can Federal agencies that fund science maximize the benefit of public access policies to U.S. taxpayers, and their investment in the peer-reviewed literature, while

minimizing burden and costs for stakeholders, including awardee institutions, scientists, publishers, Federal agencies, and libraries?

Policies that would prohibit agencies from requiring public access, such as the current proposed 'Research Works Act' (HR3699), are **not helpful**. Simply put, it is not up to the federal government to protect the business plans or profit margins of scientific publishing companies. however, I do recognize that the publishers are relevant stakeholders which is why I'd support policies that make some modest, reasonable accommodation to the interests of publishers. For example, a short time when a modest payment is required to read a scientific article before making it freely available seems perfectly reasonable to me.

Ultimately, though, we're going to benefit by making scientific knowledge readily available to anyone who wants to read it. this is the direction that should be in courage.

(7) Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

Yes. Scholarly research is scholarly research.

(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?

Ideally, immediately. That said, I recognize that exclusivity is a primary mechanism by which publishers have maintained profit. thus, short period of embargo, followed by complete open access, is currently an acceptable compromise until new business models are developed. I do not however have any empirical research to support my recommendation.

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