

From: Heinrich Mallison
Subject: Re: Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research
Date: January 12, 2012 9:08:06 AM EST

Dear Mike,
many thanks for your Email; let me rephrase:

Dear Science and Technology Policy Office,

open access to information gained from scientific inquiry has increasingly shown itself to be a key advancer of information transfer between researcher themselves, and between researchers and the interested public. This is especially, but not only, true for medical research. The ability of health care professionals and patients to access information speedily and at no cost is one of the greatest goals we can strive to reach. In recent years, we've come closer to it, not least by the National Institutes of Health's demands that taxpayer-funded research be published open access or delayed open access (after one year). In Germany, the German Science Foundation DFG even allows and regularly grants requests for funding for paid open access publishing of research results from DFG funded projects.

Today, no-fee open access publication is viable provided surprisingly small public funding. A good example are Coquina Press and their no-fees open access electronic journal Palaeontologia Electronica (palaeo-electronica.org): the journal has been publishing research results free of charge to readers and authors for 15 years now, with ever increasing site traffic and citations. The entire yearly budget for this journal is less than the typical cost of five author-fee publications in average open-access journals.

The RFI asks, among many other things: "How can policies for archiving publications and making them publically [sic] accessible be used to [...] improve the productivity of the scientific enterprise?" The answer to that is simple: the faster information is accessible, and the easier and less costly it can be accessed, the more will research results be re-tested (which increases accuracy), used to conduct further research, and ultimately be turned into public benefit via new products and methods - again, with the biggest impact in health care. Immediate, no-cost access to the information will thus be the best method to improve productivity.

Paragraph (6) asks: "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?" The answer is fairly simple: agencies can provide funding for author-fee open access publication. Potentially more cost effective, agencies could also fund open access journals, via an independent foundation so that no direct influence is possible.

Policies that should specifically NOT be adopted are all those that hinder open access. This includes, but is not limited to, the Research Works Act. RWA is a deliberate attack on progress and knowledge transfer in science. The public already pays for the research, and making it pay again for publication is, in my personal opinion, nothing short of highway robbery. All this bill would do is secure and increase the ridiculous profit margins of certain publishing companies, while limiting data access for scientists, medical personnel and citizens alike. Similarly, policies leading to pressure on scientists to conserve money to the detriment of open access publishing, by forbidding the use of research funding to pay for author fees, would play into the hands of certain businesses, but harm both research and the economic and health care gains from it.

Your sincerely,
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Fere libenter homines id quod volunt credunt.
Gaius Julius Caesar