

Boston Library Consortium
10 Milk Street, Suite 354
Boston, MA 02109

January 11, 2012

To: Office of Science and Technology Policy
Executive Office of the President
725 17th St. Room 5228
Washington, DC 20502

Re: Boston Library Consortium response to the White House RFI on
Public Access to Peer-Reviewed Scholarly Publications Resulting from
Federally Funded Research

The Boston Library Consortium (BLC), a consortium of 17 academic and research libraries, is pleased to respond to the Request for Information (RFI): Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research issued by the Office of Science and Technology.

The Boston Library Consortium members—Boston College, Boston University, Brandeis University, Marine Biological Laboratory/Woods Hole Oceanographic Institute, Massachusetts Institute of Technology, Northeastern University, Massachusetts State Library, Tufts University, University of Connecticut, Universities of Massachusetts Amherst, Boston, Dartmouth, Lowell and the Medical School, University of New Hampshire, Wellesley College, and Williams College—collaborate on two intertwined areas of great importance to all members: sharing resources and moving scholarly communication toward an open access environment to foster learning and research.

The Boston Library Consortium fully subscribes to the principle that taxpayers are entitled to access the results of publicly-funded research, research funded by their tax dollars, immediately and that

taxpayers are entitled to fully reuse those results. With its diversity in membership, the inability of a number of its members to support scientific research adequately, and the need to access this information to educate the next generation of scientific researchers and ensure that we continue to be competitive in the global scientific research arena, the BLC experiences first-hand the need to move to broader public access for taxpayer-supported research.

The Boston Library Consortium will address questions 1 and 3 because of their key importance to the Consortium. In response to Question 1, the BLC addresses access and in Question 3, permanent stewardship.

Question (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?

Comment 1

By releasing immediately federally funded scientific research results and ensuring that these results are freely accessible, researchers will have the ability to work with the most current results and data. Immediate access encourages innovation and entrepreneurship because it creates opportunities for more users, not only at different sized institutions, but also differently funded academic institutions and companies, to build new products and services.

Open access “levels the playing field”. For example, within the Boston

Library Consortium (BLC), there is significant diversity among institutions. Members consist of public and private institutions and liberal arts colleges and universities. Unequal budgets for funding science journals eliminate access to taxpayer-funded research in proprietary journals for a significant number of BLC institutions, limiting the research their students and faculty can accomplish. Science journal subscriptions are continuously being reduced for budgetary reasons and the aggregate number available within the consortium shrinks.

The relative costs and benefits of policies for archiving publications and making them publicly accessible can be analyzed by looking at the outcome of the NIH's public access policy. NIH policy costs about \$3.5 - \$4.0 million annually (out of a \$30 billion budget), that is, only about 1/100th of 1 percent of the overall budget. A government-wide policy can be implemented in a cost-effective manner by building on existing infrastructure and utilizing the investments already made by the NIH with the annual operation of PubMed Central.

To maximize U.S. economic growth and improve the productivity of the American scientific enterprise, full open access is needed along with rights to re-use fully in a digital environment. Any restrictions on use of the scientific data produced by taxpayer-funded research means that only a fraction of the value of the research is realizable.

Question (3)

(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?

Comment 3

The need for permanent stewardship and accessibility of taxpayer-funded research articles is a key concern of the Boston Library Consortium. The federal government is the appropriate entity to provide permanent stewardship of these articles in order to ensure that they are and remain permanently accessible and useable. Any public access policies must give the federal government adequate rights to archive and distribute.

The public will benefit most if interoperability and search are centralized and developed by the federal government so that standardization can be assured. PubMed Central provides an excellent example of this. The fact that PMC encompasses data storage and uses a common format in the repository means that that user can quickly search the entire collection. The single, standards-based repository allows PMC to integrate its literature with a variety of other information resources. Any future policies for permanent stewardship should leverage the approach and types of services of PMC.

NIH has led the way, and a government-wide policy can be implemented in a cost-effective manner by building on existing infrastructure and utilizing the investments already made by the NIH with the annual operation of PubMed Central.

The Boston Library Consortium supports permanent stewardship and accessibility of taxpayer-funded research by the federal government, rather than the private sector, because there is an intrinsic conflict between the requirements of long-term stewardship and the requirements of for-profit entities to show positive short term financial results. BLC libraries are purchasers of and subscribers to content from vendors, and members are aware that vendor arrangements for archiving are often very basic and content is not

actively checked. There is an overall lack of e-journal publisher participation in third-party preservation programs; for example, a recent study showed that less than 15% of Cornell e-journal holdings are preserved through the combined services of LOCKSS and Portico.

Providing the government with a copy for deposit in a dark-only archive is not a realistic solution; there is little support, even from academic institutions that understand the value of preservation, for storage without access. In addition, without regular access or use, the accuracy of the archival copy cannot be ensured. There must be a commitment like the one PMC makes to provide permanent access to all of its content—to deal with changing technology and the subsequent impact of obsolete formats as well as to ensure the accessibility and viability of the archive by allowing free access which assures consistent and active use of the archived material.

The federal government has the most experience addressing and meeting a broad mandate to serve the public and based on PMC, the experience in determining standards and formats that support interoperability and implementing them.

From: Melissa Trevvett, Executive Director
Boston Library Consortium

Melissa Trevvett Executive Director Boston Library Consortium
Ph: [617-262-6244](tel:617-262-6244) Fax: [617-262-0163](tel:617-262-0163) 10 Milk St., Suite 354 Boston MA
02108-4600 www.blc.org