

Subject: Comment on RFI: Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research

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I am writing to express my comments on this RFI, and my concern with proposed legislation in this regard.

(1) Are there steps that agencies could take ...

Just as the NIH supports PubMed, which contains abstracts of scholarly works, it could also expand such a database to include whole text. The NIH Manuscript Submission system is a start but PubMed could be expanded to include whole text of all manuscripts and be searchable, just like Google Scholar. This is currently not possible with PubMed. Manuscripts not currently included under Manuscript submission could be included by payment of licensing fees by PubMed to the publishers, but be free to the users. It will improve efficiency of information retrieval and research.

(2) What specific steps can be taken ...

Intellectual property rights of publishers should be a minor consideration because the overwhelming majority of the IP in any scientific work belongs to researchers and unreimbursed peer reviewers.

(3) What are the pros and cons ...

The overwhelming majority of published research in the US comes from federally funded sources, so it is only right that a Federal agency maintains custody and provides open access to the results of this research.

(4) Are there models or new ideas ...

There could be partnerships with private companies to build these databases, with the cost being borne by NIH or other federal agency, but the content must be freely available.

(5) What steps can be taken by Federal agencies...

(6) How can Federal agencies that fund science maximize the benefit ...

The Federal agencies and scientists and tax-payers have no obligations to commercial publishers. Open access will benefit everyone else.

(7) Besides scholarly journal articles, ...

(8) What is the appropriate embargo period ...

6 months. This is an appropriate amount of time because its too long for researchers in the field to wait to know about published research (so they and their institutions libraries will still pay for journal subscriptions). But beyond that there is no justification for keeping research results from the public at large.

Proposed legislation such as the Research Works Act (HR 3699) is detrimental to the interests of scientists, tax-payers, scientific and economic productivity, and the intention of America COMPETES Reauthorization Act of 2010 passed by Congress. HR 3699 seeks to benefit only large commercial publishers by preventing open access to tax-payer funded research, by misleadingly classifying it as "private sector research" only because it happens to be published by a commercial publisher. It is misleading because all of the true intellectual property in such publications comes from scientists (largely federally funded) and unpaid peer reviewers (also supported by public funds), while the publisher adds very little value, mainly marketing and name recognition.

Sincerely,
Vishy Iyer

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