

From: Cameron Gundry
Subject: Public Access response
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To: publicaccess@ostp.gov

To whom it may concern.

Here are my insights for the open access input. I have italicized and used red for my comments....

(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? We should not be limited by the information available. **My answer: All things being equal better knowledge of what experiments have been done, and how, would eliminate duplication of efforts as well as speedier validation / invalidation of research findings through publication.** What are the relative costs and benefits of such policies? **My Answer: Benefit is more efficient use of federal dollars going towards research. Why slow down the information flow? That would only slow down research in general. This would be a wasting tax dollars to ban open access.** What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise? **Show citation box. My answer: Full open access. of all federally funded research within 12 months of publication, as is the current model.**

(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? **My answer: None additional needed. USPTO considers publication opening up to the public the potentially novel and patentable idea(s). Anyone skilled in their art already knows this and would submit a patent publication before publishing.** 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? **My Answer: None needed. In fact, by keeping open access, the USPTO, itself can more efficiently review patent eligibilities, resulting in reduced costs and increased capacity to**

review patent applications. I can promise that the costs would go up if the USPTO staff were required to pay for each article they review. Show citation box

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(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? **My Answer:** Off-the-cuff response is that the current 12 month period is sufficient. I have conducted biomedical research for over 12 years and believe me, 12 months is plenty of delay to still allow publishers to get their profits. one year old publications can be dinosaurs. no change needed is my recommendation. 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. **My Answer:** Yes, there probably are arguments. Publications in different fields have different peaks of interest, followed by recessions. A proxy of this could be to look at citations of research publications. I suspect that in biomedical research vs. physics or mathematics, for instance, the peaks would have different time scales.

Please consider these arguments. As a Scientist who has 5 papers and over 800 citations to those papers in the field of molecular diagnostics methods developments, I can say that limiting the access to this knowledge would be adding burden to the US citizens, through protracted time periods of techniques making their way into more efficient technologies to be used in biomedical research and diagnostics. This reversal on open access publication availability for federally funded research would reverse the direction our country is trying to go, and increase the costs of health care, for instance.

Sincerely,

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