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To: The Task Force on Public Access to Scholarly Publications,
of the U.S. Office of Science and Technology Policy (OSTP)

From: The Poultry Science Association, Champaign, IL, USA
(email: psa@poultryscience.org)

Subject: Public Access RFI - General Comments from the Poultry Science
Association in response to the OSTP's Request for Information from
"non-Federal stakeholders" on the implementation of Sect. 103 of the
America COMPETES Reauthorization Act of 2010.

These comments are submitted on behalf of The Poultry Science Association (PSA), a non-profit, professional society of more than 1100 poultry scientists, founded in 1908 and committed to the discovery, dissemination and application of poultry-related scientific information. PSA is the owner and publisher of two peer-reviewed scientific journals, Poultry Science© and Journal of Applied Poultry Research©, with Poultry Science© having the highest impact factor of any journal dedicated to poultry research.

Comment on RFI Question #6:

As to the question of "maximize(ing) the benefit of public access policies to U.S. taxpayers, and their investment in peer-reviewed literature, while minimizing burden and costs for stakeholders..." we would put forth the following comments for your consideration.

First, we would clarify that U.S. taxpayer investment in poultry science research is generally limited to the funding of the research process, itself, and either does not or does not sufficiently cover the entire cost of publication and distribution of the peer-reviewed literature containing the findings of that research effort. For the past 100 plus years, PSA, through its journal subscriptions and nominal page printing charges, has been able to provide for the low-cost publication and distribution, worldwide, of poultry science research in a manner that is second to none. Public Access, as defined, could severely limit, if not eliminate, the value of journal subscriptions and therein the revenues previously used to support the publication process. With any decline in subscription revenues, additional costs would be transferred to the researcher, their institution and/or their funding source(s) (i.e. the "stakeholders"). With much of our published research done by academic institutions, this ultimately transfers the

cost burden back to the Federal and/or State taxpayer, in one form or another, which we cannot perceive as a benefit to the taxpayer, nor in any way “minimizing burden and costs for stakeholders”.

Should the additional publication costs transfer back to the stakeholder as a result of declining subscription values, the funds available for actually conducting research will be decreased to the extent that publication costs are also being drawn from a finite pool of taxpayer-funded grant dollars. This not only negatively impacts the return on the taxpayer research investment, but it threatens the advancement of the sciences, as high-value research dollars are diverted to publication costs. If Public Access can be controlled such that subscription values can be maintained, any such diversion of research dollars can be minimized or avoided all together.

Much of our agricultural research is not funded in total by Federal research grants, but rather is conducted at principally State-funded Agricultural Experiment Stations and/or with private sector research dollars. Again, any negative revenue impacts of Public Access will ultimately impact the U.S. taxpayer at either the level of State taxation or the cost of goods produced and sold to the consumer by the private sector. As previously mentioned for Federal-funded research, added publication costs stand to materially impact the research dollars available for funding of State and private sector research.

Finally, we are concerned that Public Access, and its likelihood of publishing cost redistribution, might ultimately impact the peer-review process, itself. Peer review is the critical differentiator in scientific research and it is currently conducted on a volunteer basis by those whose interests are solely in the advancement of the sciences. There is a downside risk that shifting additional publication costs to scientists and institutions might negate the incentive of the peer reviewer to add their value gratis, as they see themselves having to pay their publication costs out of limited budgets, rather than sharing in a common burden of common good.

Comment on RFI Question #8:

As to the question of “appropriate embargo period after publication before the public is granted free access ...”, we would put forth the following for your consideration.

Based upon PSA’s own experience, we would propose a twelve (12) month embargo on peer-reviewed journal publications of at least the biological sciences. PSA currently provides free public access to our journal articles after 12 months from the date of publication. We believe this time period to be reasonably short for ready access by all non-subscription users who would have use of such scientific data and, yet, 12 months has proven to be sufficiently long to recapture the vast majority of our publication investment.

Closing comments:

As an Association of professional scientists, both within the public and private sectors, our principal objective remains the advancement of the sciences. As such, we are not opposed to some reasonable manner of controlled Public Access. We understand the need to have access to peer-reviewed scientific information, but contend that most of those who can value this information in its scientific format are not currently restricted in their reasonable access to such. A reasonable embargo period prior to free public access would seem to be a manageable means to allow publishers to recapture publications costs and not disrupt a well-proven scientific process that for over 100 years has assured the taxpayer of the highest possible return on their research investments.

If Public Access eventually does proceed in a manner that negatively impacts the value of subscriptions, we would propose that additional provision for publication funding be made available to financially support this most critical portion of the scientific research process, thus not detracting from its research endeavors.

Respectfully submitted for your consideration:

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