

**From:** Marc Lipsitch <mlipsitc@hsph.harvard.edu>  
**Subject:** comment on public access policy  
**Date:** January 11, 2012 8:40:03 PM EST  
**To:** [publicaccess@ostp.gov](mailto:publicaccess@ostp.gov)

The current system of access to federally funded research through a one-year embargo on peer-reviewed scholarly publications works reasonably well, though I think the embargo period should be shorter. For most research, it ensures that a wide spectrum of readers can access it in a timely fashion, while preserving some profitability for journals.

It is not my view that maintaining the profitability of for-profit journals should be a goal of the federal government. Many analyses (eg by Bergstrom and Bergstrom) have found that for-profit journals tend to be more expensive per unit of value (article, citation, etc) than not-for-profit ones. The journal industry is unique in that the content is research paid for by largely by taxpayers, written by scientists, reviewed usually without compensation by other (taxpayer-supported) scientists, and often paid for (in the form of page charges) by the scientists' grants. Then the overhead from grants goes to pay for subscriptions. As Bergstrom and Bergstrom have argued

<http://www.nature.com/nature/focus/accessdebate/22.html> , it is as if General Motors were paid both by car purchasers and by steel manufacturers; I would add, in this case it is as if the funding for the purchasers and steelmakers to do so came from the taxpayers.

Taxpayers fund the research and should get the benefits. The current system is not anti-journal publisher, but rather simply says if the taxpayers fund the research, they should be able to obtain it for free. If journals want to have another model, they are welcome to do so for non-taxpayer-sponsored research. Or

they can offer additional content (news, job postings, etc) that make money while providing taxpayer-funded content to gain attention. But we should not be engaging in industrial policy to prop up journals by providing them taxpayer-subsidized content (and reviewing labor) to make sure they make a tidy profit.

My own recommendation would be to make an embargo period of one month, so that effectively federally funded research is immediately available to all. This would indeed likely lead to the demise of some journals. But not to the main ones that add value (Science, Nature, Lancet, etc.) because people want to see the latest and most important work immediately; and if the obscure, rarely cited journals declined, it is not clear what is lost. That is, many of the queries in the RFI assume that there is great societal value in maintaining the large number of journals we have at present. I don't think this has been demonstrated. Physics does quite well with ArXiv as their main source of information, which is not a journal and doesn't make money. If we as taxpayers are going to subsidize journal publishers, it is their burden to show that the social value exceeds the cost paid.

--Marc Lipsitch, Professor of Epidemiology, Harvard School of Public Health, Boston, MA

Editorial board member: PLoS Medicine, Epidemiology, American Journal of Epidemiology, Epidemics

--