

Responsibility for the dissemination of publicly funded research results is shared by multiple parties. The comments presented here are intended to apply to primary original research articles reporting novel results, not necessarily to other types of publications such as reviews, commentaries, etc. The latter should be discussed separately, in my view.

A) The public surely has a right to access articles for no or low cost if public funds have paid for the research. For a citizen to have to pay \$30 for an article (for example, regarding a disease that they or a family member has) will rightly be viewed as unreasonable by the public. Researchers often have access through the subscriptions of their institutions, but this is no help to the average citizen who surely has a right to reasonable access.

B) Authors should be expected to take responsibility for their publication decisions and publish so that their work is widely accessible. Authors control submissions, not publishers. Publishers can only choose among the submissions they actually receive. Publicly funded researchers make a decision as to where they publish their results, and thus they need to accept responsibility for understanding what rights they are granting to the publisher when they choose to publish in a given journal. Authors have options. They can choose open access (OA) journals or journals whose publishers charge no or low fees for individual articles that are requested by the public. Or they can choose to publish in journals that charge \$30 for a single article. Legislation should not be needed to ensure broad access at reasonable cost if authors, their institutions and their funding agencies take responsibility for ensuring that submission of manuscripts is consistent with broad, reasonable access.

C) A publisher provides an online system for submission and review that has some value, but that value has a limit and should be evaluated and quantified fairly. Publishers provide typesetting, but self-publishing is inexpensive now, so the value of this too is limited and should be evaluated relative to other publishing options that take into account new technologies. Also, some publishers do copy editing, but it is questionable how much that really benefits authors, or even readers. Authors are responsible for their every word, and can hire their own editors if they need help expressing themselves in the lingua franca of science, English. If editors and publishers want to impose changes in text on authors, authors do have the option to publish elsewhere.

D) OA journals have fixed costs of at least \$1000 and often \$2000 or more per article. Currently, authors pay only part of these costs in most OA journals, and the rest is subsidized with grants, donations, and revenues from other activities of the publisher (non-profit and profit). Long term sustainability of OA journals presumably requires that authors and their institutions may eventually have to pay the full cost of publication.

E) Research that is not published has effectively not been done, i.e., effectively doesn't exist - so publication is a necessary part of doing publicly funded research - research is not complete until published accessibly. Thus, publication is a reasonable cost of performing research and should be factored into funding of research. Authors and research institutions should take responsibility for paying the reasonable costs of publication to ensure their research is widely available. Public funding agencies need to be an equal part of the solution in order to ensure that research they fund is completed, by being published in an accessible manner.

F) It is reasonable for public funders to require researchers to publish in a way that makes the work widely accessible at reasonable cost, including data mining. Guidelines or rules are justifiable. Legislation

should not be needed to create access, and also should not be used to limit access (as is the case for the Research Works Act). What is needed is that public funders make their expectations known to grant recipients and hold them to it. Also, public research institutions can and should direct their researchers to publish their work in a manner that makes it widely accessible at reasonable cost.

In sum, authors, funders and research institutions all share responsibility for ensuring access to research results. By working together they should be able to come up with practices and policies that ensure wide availability at reasonable cost of all publicly funded primary research results. Publishers facilitate the process of disseminating research results, but with enough competition among publishers, including OA journals, sufficient pressure can be applied to ensure fair access, but ONLY if authors, funders and institutions who are the source of the research take responsibility for their publication decisions. Rigid, legislative solutions can be counterproductive, as the RWA is, in my view. Legislation could usefully direct funding agencies to develop policies that ensure fair and reasonable access to citizens and scientists, considering both cost and time following initial publication, but should not specify what those policies should be. Flexibility is important: leaving room for all parties to work together to find workable solutions as technology changes over time is important.

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<http://ibiosphere.blogspot.com/2011/09/ibiosphere-facilitating-creation-of.html>