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The American Society for Cell Biology (ASCB) would like to thank the Office of Science and Technology Policy (OSTP) for bringing attention to the important issue of public access to the results of federally funded research. The ASCB is a nonprofit, international scientific society of approximately 9,000 members at leading research institutions, state colleges, undergraduate teaching institutions, and biotechnology companies. The Society's publications include the high-impact monthly research journal *Molecular Biology of the Cell (MBoC)*.

We will comment specifically on questions 3, 6, and 8 of the RFI, based on our experience as a nonprofit scientific publisher.

**(Q3)** A comprehensive and searchable manuscript database will profoundly enhance scientists' research productivity. We believe that the public will be best served if research results are deposited within central interoperable repositories that share common formats and standards, as this will make the data more accessible and more readily integrated with related databases. It will also increase the efficiency and sophistication with which the stored articles can be searched for relevant information. These advantages will significantly increase the value of the information to the scientific community.

PubMed Central provides an efficient and cost-effective model for how such a repository might be structured and managed. The ASCB was one of the first publishers to participate in PubMed Central and we remain a Full Participant. We provide PubMed Central with full text articles from *MBoC* in XML and PDF formats, together with image files. The vendor that hosts *MBoC* online uses files in the same formats, so the files can simply be forwarded to PubMed Central after an issue is published. No additional effort is required on the part of authors or ASCB staff, and there is no additional expense apart from the small fee that the online host charges us to forward the files.

Over 500,000 unique users access the PubMed Central website every day, retrieving approximately one million articles; PubMed Central is clearly increasing public access to the biomedical literature and we are proud to be a partner in this effort.

**(Q6)** The ASCB believes strongly that barriers to scientific communication slow scientific progress. The more widely scientific results are disseminated, the more readily they can be understood, applied, and built upon. The sooner findings are shared, the faster they will lead to new scientific insights and breakthroughs. This conviction has motivated the ASCB, since 2001, to provide free access to all manuscripts submitted to *MBoC* within one week of acceptance and to all copy-edited and finalized research articles two months after their publication. The articles are available both on the journal's website and in the National Library of Medicine's online archive, PubMed Central.

The vast majority of the biomedical research conducted at American universities and colleges is funded by taxpayers. The ASCB believes that taxpayers are best served when all scientists, educators, physicians, and members of the public – including patients and their families – have access to publicly funded research results. So long as significant access barriers remain, taxpayers are not fully benefiting from the work that they fund. With the proliferation of networked technology, we have an unprecedented and cost-effective means to overcome such barriers. It is now possible and practical to offer free access to every potential user. It is incumbent upon us, as scientists and citizens, to take full advantage of this opportunity.

**(Q8)** Some publishers argue that providing free access to their journal's content will catastrophically erode their subscription revenue base. The experience of many successful research journals demonstrates otherwise; these journals make their online content freely available after a short embargo period that protects subscription revenue. For example, as noted above, the content of *MBoC* is free to all after only two months, yet the journal remains not only financially sound, but profitable. This is because libraries represent research scientists, who have a specific need to access research articles promptly after their publication; these researchers cannot wait months for free access. The first few months after an *MBoC* article is published show the greatest activity in terms of online views and downloads of these articles, directly demonstrating the time sensitivity of this information to readers.

Many scientific journals also offer "front matter," such as news features, announcements, and reviews in the same publication as research papers. Since this value-added content is typically not paid for by federal research dollars, publishers would not be required to deposit it for public access. This material is valuable to the reader, adding further to the incentive for institutions and individuals to maintain their subscriptions to scientific journals.

Federally funded research articles should be made freely available as soon as possible so that science and the public benefit from their expanded use and application. At the same time, it is important that nonprofit societies and other publishers generate sufficient revenues to sustain the costs of reviewing and publishing articles. We believe that a six-month embargo period represents a compromise between the financial

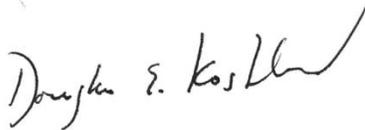
requirements of supporting a journal and the need for access to current research.

For the reasons outlined above, the ASCB supports efforts to require that the results of federally funded research be made freely available to the public, in one or more centralized government repositories, no more than six months after they are published.

Sincerely,

A handwritten signature in black ink that reads "Ron Vale". The letters are cursive and fluid.

Ron Vale  
President  
The American Society for Cell Biology

A handwritten signature in black ink that reads "Douglas E. Koshland". The signature is cursive and includes a long, sweeping flourish at the end.

Douglas Koshland  
Chair, Public Policy Committee  
The American Society for Cell Biology