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Background: NAGPS represents over 50 major U.S. universities and 2.6 million graduate and professional students in the United States. NAGPS is a non-profit organization [501(c)(3)] dedicated to the continual improvement of the graduate and professional student experience and of the member associations that serve graduate and professional students. Our mission is to develop and sustain a member network that connects graduate and professional students and their associations, to provide resources and support to empower members, and to advocate on behalf of graduate/professional student interests across the nation.

NAGPS has been an avid supporter of public access policies because we believe that our future as students and as members of the academy and the world at-large is intimately connected with the dissemination of information via the Internet and the right to access such information. Graduate and professional students currently do not have access to all the scholarly research they need to pursue their education, research, and career goals.

Comment 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? What are the relative costs and benefits of such policies? What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

As the United States continues its shift toward a knowledge-based economy, making publicly funded research available to all graduate and professional students is a direct investment in America's future. Open-access to publically funded research will facilitate the development of new entrepreneurial ventures by bright, innovative, and talented new graduates. Many graduate and professional students are already funded by federal dollars either directly through federal loans, or indirectly through NSF, NIH, USDA or other federal agency grants. The skills and talents that graduate and professional students develop are reliant upon having access to the most recent and up-to-date knowledge generated in their field.

Not having access to the most up to date research means that federal investments are being allowed to dull. Expanding the public's access to cutting-edge research will help graduate and professional students to enter the workforce running, allowing them to continue to develop new innovations and industries while they are still students, and after leaving their institutions of instruction. It is today's graduate and professional students in the humanities, arts, biological/health sciences, social sciences, engineering and computer sciences that will develop and found the Fortune 500 companies of the next century. Open access can help these new job-creators and job-holders to get their ideas and companies into the marketplace.

Comment 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? 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?

The United States public would be best served by making public access available for all published peer-reviewed works or presentations that were funded by federal dollars. Many are already available freely in University repositories, where faculty may be encouraged to store pre-published versions of their manuscripts, or on federal agency and personal websites. Developing an open-access policy could move these databases and archives to a more easily searchable and centralized location similar to the current PubMed and Google scholar databases.

Developing such a database without infringing on copyrights could best be accomplished by ensuring that federally funded researchers be required to publish their findings through appropriate Creative Commons CC-BY licenses. High impact journals will always have the need and desire to publish high quality articles and research in order to keep their journals relevant. Researchers and scientists will continue to maintain their need to publish in high impact journals in order to remain relevant in

their fields and ensure their knowledge is widely disseminated. Requiring the use of Creative Common CC-BY licenses would allow publishers and scientists to continue to publish the highest quality articles in the highest impact academic journals while still allowing for appropriate and legal dissemination of these works.

Comment 3: What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

Long-term stewardship would be best guaranteed by the hosting of databases by government agencies. The NSF, NIH, USDA, and other government institutions are the most appropriate stewards to ensure that publicly funded articles are permanently preserved, and made both accessible and usable by the general public. The hosting of such articles in a centralized database would best enable innovative companies and individuals to develop new services and companies. In order to accomplish this wide availability - approved repositories that meet conditions for public accessibility, usage rights, interoperability, and long-term article preservation could be maintained by third-parties and innovative public/private partnerships.

Comment 4: Are there models or new ideas for public-private partnerships that take advantage of existing publisher archives and encourage innovation in accessibility and interoperability, while ensuring long-term stewardship of the results of federally funded research?

No comment at this time

Comment 6: How can Federal agencies that fund science maximize the benefit of public access policies to U.S. taxpayers, and their investment in the peer-reviewed literature, while minimizing burden and costs for stakeholders, including awardee institutions, scientists, publishers, Federal agencies, and libraries?

No comment at this time.

Comment 7: Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

Peer-reviewed conference papers and proceedings represent a significant portion of published literature and information that is relevant to their respective fields. Often, these papers and proceedings will contain additional or unique information on research that is otherwise unpublished. Due to both their impact and contribution, these types of publications should be included in the same category as journal articles with respect to public accessibility. Additionally, conference proceedings and papers can often represent first step towards journal publications, whose purpose keep the field's community of authors and researcher up-to-date on both current trends and current work being done in the field. For this reason, public access to these types of publications is important, allowing readers to remain apprised to both current research and current trends. Certain conference proceedings and papers may contain comprehensive reviews of published research to date, keeping both old and new authors informed on a comprehensive outlook in a particular field of interest. For this reason, public access remains important as it enables a wider audience of readers to both understand and perhaps enter a field of research. Conference proceedings and papers allow authors to share their research with the broader community as it progresses. Public access to such publications will enable others to keep up-to-date with current and future trends on specific subject, enabling a fast dissemination of knowledge throughout the research process. Book chapters that are derived in part from publicly funded research may represent a separate category from journal articles or conference proceedings, due not only to their publication medium, but the content contained within the chapters that may not derive from federal funding.

Comment 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? 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?

An embargo period no longer than 6-12 months.