

12 January 2012

Task Force on Scholarly Publications  
National Science and Technology Council  
Committee on Science  
Office of Science and Technology Policy  
Office of the President  
Washington, DC

Sent via email to: [publicaccess@ostp.gov](mailto:publicaccess@ostp.gov)

To Whom It May Concern:

These comments respond to the "Request for Information: Public Access to Peer Reviewed Scholarly Publications Resulting from Federally Funded Research," published in the *Federal Register* 76(214):68518-68520, on 4 November 2011.

**Comment (1):** One thing that agencies could do would be to require that the results of research they fund be prepared and submitted for peer-review publication and fund such efforts. Substantial amounts of archaeological research in the US are funded as part of environmental impact and historic preservation reviews required by NEPA, the National Historic Preservation Act, or the Archaeological Resources Protection Act as part of public project planning. The number of substantial archaeological investigations reported by federal agencies exceeds 50,000 annually (e.g., Department of the Interior 2009, 2010). It is rare for the results of the historical or scientific research from these investigations to be published in peer-reviewed journals or books. Requiring a peer-review publication from such studies, and making these publications widely accessible would increase the flow of information available for subsequent investigations on related topics or geographic areas.

Alternatively, agencies could require that the results of these kinds of investigations be subject to peer-review, and that any subsequent appropriate revisions be made, prior to accepting the final report(s) of the investigation. Such a procedure would not require publication in a traditional scholarly journal. Realistically, either of these requirements should be limited to projects of sizable scope in order for the review to be worthwhile.

Another alternative would be for agencies to require peer-reviews of all substantial reports created for environmental or historic preservation identification and evaluation studies or data-recovery and documentation studies. This would have the additional value of improving the

**DIGITAL ANTIQUITY**

**School of Human Evolution and Social Change**  
an academic unit of the College of Liberal Arts and Sciences

Francis P. McManamon, Executive Director

PO Box 872402

Tempe, AZ 85287-2402

Direct: (480) 965-6510 Digital Antiquity: (480) 965-1369 Fax: (480) 965-7671

<http://digitalantiquity.org> <http://tdar.org> [fpm@digitalantiquity.org](mailto:fpm@digitalantiquity.org)

final reporting on such projects typically done not for strictly academic or scholarly functions, but as part of public project planning and construction projects.

One would expect that instituting either of these agency procedures requiring peer-review will broaden access to information that will make subsequent investigations more effective and efficient. Any new studies will have the advantage of better information from which they would be starting, information that is firmer and more widely based than if access to data and information from earlier studies is not accessible. Easier, more accurate, and quicker environmental reviews for public projects clearly would contribute to US economic growth and productivity.

Cited works:

Department of the Interior

2010 *The Goals and Accomplishments of the Federal Archeology Program: The Secretary of the Interior's Report to Congress on the Federal Archeology Program, 2004–2007*. Departmental Consulting Archeologist, Archeology Program, National Park Service, Washington, DC. (<http://www.nps.gov/archeology/SRC/reportPdfs/2004-07.pdf>).

2009 *The Goals and Accomplishments of the Federal Archeology Program: The Secretary of the Interior's Report to Congress on the Federal Archeology Program, 1998-2003*. Departmental Consulting Archeologist, Archeology Program, National Park Service, Washington, DC. (<http://www.nps.gov/archeology/SRC/reportPdfs/1998-03.pdf>).

**Comment (3).** A network of decentralized disciplinary-based digital repositories will be the most effective way in which to manage public access to federal research data and information. The variation in metadata organization and terminology among the wide variety of scientific disciplines involved in government research is too large to be effectively and efficiently accommodated by one or a few centralized repositories. However, the Federal government does have a role to play in establishing minimum metadata standards, regardless of discipline. Further, these disciplinary-based repositories must be interoperable, that is, linked through a central portal. In this way, the actual document (or other information resource) is stored in a decentralized repository but the descriptive information (metadata) about the item is accessible in a centralized repository like data.gov (<http://www.data.gov/>).

**Comment (4).** Existing publisher archives could be made better known and more widely used if metadata about the publishers' catalog listings, including summaries of the books, articles or book chapters they contain were exposed to searches by being accessible through digital repositories. In the field of archaeology, for example, [the Digital Archaeological Record \(tDAR\)](#) is open for publishers to create a metadata page for each of their archaeological publications. The metadata includes a description of the contents of the publication and standard archaeological metadata terms to assist with discover by individuals search the tDAR repository. Publishers may upload a portion of the publication the metadata page refers to (e.g., the front matter and perhaps an introductory chapter). Publishers also may include

information about how to order the publication, or a link to the publisher's web site for those who want to purchase it.

There are mutual benefits from this kind of commercial/not-for-profit partnership ([the Center for Digital Antiquity](#) which maintains tDAR is a not-for-profit organization being incubated at Arizona State University). The repository function that Digital Antiquity is set up to carry out gains additional digital resources that it can make available to its users. Publishers gain an inexpensive and easy way of advertizing their publications. The overall benefit is that available information is made more easily discoverable, accessible, and usable. In effect, open and not-for-profit repositories like tDAR are linking disparate information about a topic or an area, by including metadata from commercial publishing firms with the metadata and documents in open repositories. Users gain a "one-stop-shopping" experience that increases accessibility for users.

**Comment (7).** Besides scholarly journal articles with the peer-reviewed results of research funded by federal agencies, there are a number of other kinds of products from research that should be made accessible to the public. In my answer to Q.1, I noted that much of the research results from federally funded investigations are not peer-reviewed. I suggested that federal agencies should change this by instituting procedures requiring peer review, and funding it, at least for projects with sizable budgets and scopes.

There are a variety of research products that should be available to the public, within the limits of individual privacy protection and limiting the exposure of confidential information, copyrighted works, and individual intellectual property. Among these are technical and descriptive reports about the methods, techniques, and substantive information of the research, data sets (spreadsheets and databases with basic descriptive and analytical data), images, and scanned data of various sorts (e.g., GPS, GIS, object or landscape scans, etc.).

**Other items for the TF to consider.** As noted in several of the answers above, substantial results of research funded by federal agencies are not peer-reviewed. Agencies should institute procedures to provide funding for more peer-reviewing. Agencies also should make accessible more of the results that are not peer-reviewed so that these results can be used more widely.

Please feel free to contact me directly if you have any questions or seek additional information regarding our comments.

Sincerely,



Francis P. McManamon, Ph.D., RPA  
Executive Director and Research Professor