



American Society of Animal Science

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April 30, 2008

Elias A. Zerhouni, M.D., Director
National Institutes of Health
9000 Rockville Pike
Bethesda, MD 20892

Dear Dr. Zerhouni:

On behalf of ASAS, ADSA, PSA, AMSA, and ARPAS and our associated journals, we are writing to commend your vision of “an interconnected world of science.” In addition, we support your efforts to enhance public access to scientific research, which is a goal we have been working on through development of various online tools that facilitate such access. Nonetheless, we are concerned about several currently proposed NIH policies related to open access and manuscript posting on Pub Med Central (PMC). Specifically, our concerns include the following:

1. **Copyright.** Blanket requirements in grant contracts effectively deny authors and publishers copyright benefits, particularly the ability to decide how and in what form their works are distributed. We ask you to give serious consideration to alternatives to the NIH policy of mandated centralized posting on PMC that are sensitive to copyright issues and consistent with the requirement for access within 12 months of publication as mandated by the approved legislation.
2. **Quality Control and Compliance with Publisher Policies.** Currently, some manuscripts are posted to PubMed Central (PMC) in violation of publisher policies.
 - a. We ask you to consider how NIH will ensure that the correct manuscript version is posted to PMC at the appropriate time and in a manner that is consistent with publisher agreements and the legislatively approved policy..
 - b. We further ask you to consider how NIH will ensure that articles will not be posted unless they are received from the publisher.
3. **Scope.** The revised public access policy calls for submission of review articles. Because review articles are not typically a result of NIH-funded research grants, this requirement seems outside the purview of the legislative mandate and unfairly burdens journals with a business model that focuses on publishing a large number of review articles.
4. **Repurposing.** How will NIH ensure the editorial integrity of the underlying work? Will NIH guarantee that no substantive editorial changes are made to manuscripts and that the context and focus of manuscripts will be protected?

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5. **Piracy.** What practices will NIH use to prevent third parties from exploiting copyrighted content (e.g., altering, pirating, redisplaying, republishing, or reselling) that is posted to PMC.

We believe that these questions are vitally important to proper implementation of the NIH policy, and we trust that NIH will commit to fully address these questions as we work together to enhance public access to science. Please feel free to contact us if we can be of assistance or provide further information regarding our concerns.

Sincerely,

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EiC, Journal of Animal Science

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President, American Society of Animal Science

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EiC, Journal of Dairy Science

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