



January 20, 2010

Office of Science and Technology Policy
725 17th Street, NW
Washington, DC 20502

Via e-mail: publicaccess@ostp.gov

RE: Request for comments on public access to scientific publications

The American Institute of Biological Sciences (AIBS) appreciates the opportunity to provide comments to the Office of Science and Technology Policy (OSTP) on the topic of public access to peer-reviewed scientific literature. Thank you for extending the deadline for comments from January 7, 2010 to January 21, 2010. Among the recommendations offered here, however, is a request that the public comment period be extended by an additional 60 days. This extension would permit stakeholders to carefully consider the recommendations of a recently released report commissioned by the House Science and Technology Committee.

AIBS is a nonprofit 501(c)(3) scientific association dedicated to advancing biological research and education for the welfare of society. Founded in 1947 as a part of the National Academy of Sciences, AIBS became an independent, member-governed organization in the 1950s. Today, with headquarters in Washington, DC, and a staff of approximately 50, AIBS is sustained by a robust membership of individual biologists and nearly 200 professional societies and scientific organizations; the combined individual membership of the latter exceeds 250,000. AIBS advances its mission through coalition activities in research, education, and public policy; publishing the peer-reviewed journal *BioScience* and the education website ActionBioscience.org; providing scientific peer-review and advisory services to government agencies and other clients; convening meetings; and managing scientific programs.

The President's effort to increase government transparency is laudable. It is unwise, however, to artificially link public access policy development to the Administration's transparency initiative. The issues associated with public access to scientific literature are too complex to be interwoven with other policy issues.

On January 15, 2010, the Scholarly Publishing Roundtable released "Report and Recommendations from the Scholarly Publishing Roundtable," a document reviewing and

offering principles to include in a public access policy. The scope and significance of these recommendations deserve deliberate and thoughtful consideration by the government and all scholarly publishing stakeholders.

The “Report and Recommendations from the Scholarly Publishing Roundtable” was commissioned by the House Science and Technology Committee with the apparent encouragement of the White House Office of Science and Technology Policy. The effort, according to the roundtable report, was an attempt to use data to help clarify an increasingly contentious debate. The roundtable, importantly, was also charged with developing a consensus statement outlining options for increased public access to the scholarly literature. Although the final report appears to have articulated widely accepted principles, stated the importance of preserving the integrity of the peer-review process, and noted the need for flexible and sustainable business models, the report did fall short of the goal of achieving consensus. Two roundtable members did not endorse the final document.

The roundtable report deserves careful review and could serve as a basis for a continued international dialogue about how to promote increased public access to the scholarly literature. As this report suggests, not all academic communities and publication models are the same. A one-size-fits-all federal policy will disrupt and damage the publication process for many research communities, particularly those with limited access to federal funding, investigators who receive small grants, and research communities that do not attract strong commercial interest.

Researchers working in fields with limited commercial interest may produce fewer publications than those in other fields, but such publications may be longer than the average publication of, for example, a medical researcher, and may have taken more time to prepare. Moreover, because some disciplines produce fewer, but longer, articles, the journals that publish these papers may be produced less frequently. Thus, it may be difficult or impossible for the publisher to sell advertisements or secure sponsorships to generate the funds required to replace lost subscription revenue.

If a government-wide policy is pursued, it must be flexible enough to respond appropriately to the needs of different research communities. Not only should each agency be given the latitude to work with its primary research communities, but each agency’s policy must recognize the diversity within its research communities. For example, the National Science Foundation (NSF) supports all areas of fundamental scientific inquiry. However, a viable and sustainable public access policy for NSF-funded physics research may be quite different from a viable and sustainable policy for NSF-funded social science or biodiversity research.

Interestingly, a growing area of research involves synthesizing and integrating insights contained in previously published papers. Often, this work can produce significant but long research articles. This work may often be done by researchers who are not currently being funded. Most discussions of public access publishing policy fail to recognize the costs of producing and publishing this kind of integrative knowledge, and do not address the question of who will provide the funds to publish these peer-reviewed articles.

The free market and the scholarly publishing community are developing and evaluating sustainable business models that achieve the principles identified in the roundtable report. At this time, OSTP should continue to work with the scholarly publishing community to foster this innovation without imposing artificial and potentially damaging mandates.

Thank you for your consideration of these comments. Please contact me or AIBS director of public policy, Dr. Robert Gropp, at 202-628-1500 if we may provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "R. O'Grady", written in a cursive style.

Richard O'Grady, Ph.D.
Executive Director