



American Society of Plant Biologists

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Dr. Diane DiEuliis
Assistant Director, Life Sciences
White House Office of Science and Technology Policy
725 17th Street, NW
Washington, DC 20502

RE: Public Access Policies for Science and Technology Funding Agencies Across the Federal Government

Dear Dr. DiEuliis:

The American Society of Plant Biologists (ASPB) is a nonprofit scholarly membership society of ~5,000 plant scientists. It was founded in 1926 to promote the growth and development of plant biology and plant biologists and to foster and communicate research in plant biology. The Society welcomes the opportunity to respond to OSTP's Request for Public Comments on Public Access Policies for Science and Technology Funding Agencies Across the Federal Government.

ASPB fosters research in plant biology through a variety of venues, primarily by publishing cutting-edge plant biology research in our two high-impact journals *Plant Physiology* and *The Plant Cell*. The revenues ASPB earns through reasonably priced subscriptions to these two publications—which are delivered monthly to nearly 2000 individuals and institutions—is largely reinvested in the peer review, editing, and production of scientific articles, as well as in the Society's many other activities in the realms of research, education, and public policy.

In 2009, nearly 60% of our members—mostly research scientists at universities—and over a third of our authors lived and worked in the United States. A significant portion of our authors are supported in their research by the U.S. government, notably through grants from agencies including the NIH, DOE, NSF, and USDA, which together funded about 20% of the research studies reported in our journals.

ASPB, like other science, technology, and math (STM) publishers, organizes and oversees the certification and validation of research results through its peer review process. The Society further invests heavily in high-quality production and sophisticated electronic search and retrieval functionality that, we believe, add great value to the reports we publish. And in light of the Society's mission, we go to great lengths to support the rapid dissemination of this value-added content. For example, in 2000, we were one of the first STM societies to make not only the peer-reviewed manuscript but the final published article—our version of record—free on our journal sites and at PubMed Central 12 months after publication. Further, we offer our authors the option

to purchase immediate free access for their articles, and for *Plant Physiology* we currently extend free access to all corresponding authors who are members of the Society. We also make our content free upon publication to eligible institutions in developing nations who participate in the AGORA, OARE, and HINARE initiatives and to a handful of small minority serving institutions in this country who have requested access. For populations served by none of the above mechanisms, we make our articles available on an individual basis for only \$10. Clearly the Society is committed to the widespread distribution of the research content it publishes, and it has demonstrated that commitment through a variety of means that it has identified and deemed consistent with its underlying business model.

We worry, though, that the revenues the Society depends on to continue its investment in the dissemination of information to the plant science community and the general public could be threatened by a one-size-fits-all public access mandate that requires the free distribution via a government-run database of the articles we peer review and publish. We believe that private-sector publishers must be allowed to operate in a free market and to determine and control their own business models appropriate to the disciplines they serve. Such protections ensure that we can continue to develop new initiatives and provide high-quality services to our various constituents.

Does this mean that ASPB rejects the notion that taxpayers should have access to the outputs of taxpayer-funded research and that the government should ensure access to such outputs? Not at all. In fact, the Society's actions over the past decade clearly demonstrate its commitment not only to rapid public access to peer-reviewed research papers but also to the notion that whenever feasible the version of record should be the version to which that access is provided. But we believe any model adopted toward this end should serve *all* constituents. As already stated, ASPB, within the constraints of its own business model, has made its version of record available in a number of ways.

However, if the government intends to proceed in developing its own public access policies, then the Society echoes the recommendation articulated in the recently published report from the Scholarly Publishing Roundtable (<http://science.house.gov/press/PRArticle.aspx?NewsID=2710>). In particular, the government should work in full, meaningful, and open consultation with all vested stakeholders to define measurable goals and to take into account key differences in publishing dynamics among subject disciplines, rather than trying to impose a unilateral "one-size-fits all" policy across disciplines. Allowing individual agencies to develop their own policies, suitable to the scholarly communities whose research endeavors they fund and in whose journals the research is published, is one approach that we strongly feel merits consideration.

In sum, ASPB reiterates its belief that the system of peer-reviewed STM journals greatly assists research efficiency and suggests that federal agencies work cooperatively with publishers to find acceptable policies for public access that do not impinge on publishers' ability to add important value to research reports. We appreciate the opportunity to comment and stand ready to assist in any way possible toward the development of policies that work for all vested stakeholders and that support the rapid dissemination of high-quality research content into the foreseeable future.

Sincerely,



Tuan-hua David Ho
President, ASPB
Washington University in St. Louis



Gary Stacey
Chair, ASPB Public Affairs Committee
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