

Response to NIH notice NOT-OD-04-064
Enhanced Public Access to NIH Research Information

From: **The Physiological Society**

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I write in response to the above consultation notice, on behalf of the Physiological Society of Great Britain and Eire. As I am sure you are aware, academic publishing and Open Access have recently been the subject of a Parliamentary Committee report in the UK. In addition, the Wellcome Trust, the major non-governmental funding agency for biomedicine research in the UK, has also published its own report and is in consultation with PubMed Central and stakeholders concerning a similar plan to that proposed by the NIH.

We are writing to express our concerns regarding the current proposals outlined in notice NOT-OD-04-064, as we believe that if implemented as suggested they would significantly and adversely affect our ability to fulfil our mission and those of similar not-for-profit organisations.

1 About the Society

The Physiological Society is a learned society and a registered charity (not-for-profit organisation) in the UK, with around 2,700 members from 20 countries. The Society publishes two scientific journals, the *Journal of Physiology* and *Experimental Physiology*, which received 1937 manuscript submissions in 2003, of which 760 were subsequently published. Significantly more than 20% of published papers were derived from research funded by the NIH. Unlike our sister society in the USA, we charge no submission fee or page charges to Authors, and the majority of the funds obtained from subscription to the journals is therefore required to support the editorial and publication process. This is similar to the situation for most other UK and EU journals published by societies and other not-for-profit organisations. The remaining income from journal subscriptions is used by the Society to support its charitable goals, i.e. promotion of physiology through supporting scientific meetings, assisting public understanding of science and recruitment of scientists through our publications for schools. The Society also assists the training of young physiologists through postgraduate workshops and specialist courses. It is only able to support all these activities through the income derived from the journals. Membership dues are not sufficient to cover these other activities, and there are no other ways open to raise revenue for this dissemination of information to which the Society is committed. Other learned societies both here and in the USA are undoubtedly in the same position.

2 Commitment to Open Access

The Physiological Society supports and adheres to the D.C. Principles for Free Access to Science. Both the *Journal of Physiology* and *Experimental Physiology* are available through HighWire, and accepted papers are rapidly made available electronically in copyedited form before final publication of each issue. Members of the Society have immediate full access to our publications. The Society is however committed to open access as far as is possible, and one year after publication we allow open and free access to all our electronic archives; reviews are made freely available immediately. We also allow immediate free access to institutions in designated developing countries. In addition, all our back archives for the *Journal of Physiology* from issue 1 (1878) are currently being processed for electronic archiving on PubMed Central, generously funded the Wellcome Trust, and these will also be freely accessible. We are funding a similar

arrangement for Experimental Physiology ourselves. It should be noted that more than half of all PubMed cited journals do not allow any form of free access.

3 Effect of NIH proposals on the Society

Loss of income from journal subscriptions would have a severe effect on the Society's ability to fulfill its charitable goals, or indeed publish the journals at all without charging Authors significant submission and page charges, which in our view could deter submission of good papers from those scientists who do not have sufficient resources. It is estimated that each published paper costs on average ~\$3000. At present, UK funding agencies either do not provide any funding for publication of results, or only a relatively small amount; as recognized by the UK Government, any move, however small, to an author pays scenario would require a significant change in attitude by the funding agencies.

The impact of the NIH proposal would be particularly severe for journals that publish less often than monthly, as for example Experimental Physiology. It should also be noted that papers published in Physiology journals tend to have exceptional longevity; the Journal of Physiology for example has a cited half-life of 9.5 years, and Experimental Physiology 6 years (ISI). Reducing the embargo period from one year to six months could therefore have a disproportionate effect on these and similar journals.

4 Response to other components of the proposal

We are not convinced of the cost-effectiveness of having a separate depository for NIH (or, for that matter, for Wellcome Trust) funded papers. This would exclude the large component of published work funded by other agencies, and would also duplicate the work and cost of other on-line archives, in particular that of the excellent HighWire Press. To provide the degree of functionality provided by HighWire and commercial sites such as ScienceDirect would be extremely expensive for little if any additional gain.

We would strongly support the alternative proposal from the American Physiological Society in this area, and suggest that money would be better spent on upgrading the PubMed (Medline) service. In particular, the search mechanism should be made more comprehensive and intelligent, so that full text searches across journal web sites becomes possible. Full participation in the collaborative CrossRef venture would also be highly beneficial to all stakeholders, researchers and general public. In essence, such a search engine could provide a Google style interface to biomedical publications, and make it easier to use for non-experts. An aspect that directly relates to one of the principles behind the NIH proposal, that of being able to identify NIH funded work, could be easily achieved by making the funding source more visible on both searches and articles, and use as a search term.

Finally, there is serious concern that an article deposited in PubMed Central before copyediting and in the absence of supporting materials may differ in significant respects from the finally agreed and published article, leading to confusion and misunderstanding. The copyediting process removes errors and inconsistencies that might otherwise alter meaning. This is of particular importance for naïve readers. It would highly preferable to provide a link to the main Journal web site, where the approved final version is maintained, along with any commentaries and document histories.

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