November 5, 2004

Elias A. Zerhouni, M.D.
Director
National Institutes of Health
Building 1 – Shannon Building
Room 126
Bethesda, MD 20892-0148

Dear Dr. Zerhouni:

The Society for Neuroscience (SfN) wishes to comment on the NIH Notice No. NOT-OD-04-064, which seeks to establish a comprehensive electronic resource of NIH-funded research results and provide enhanced public access to NIH health-related research information. The Society for Neuroscience, a scientific, non-profit organization with more than 36,000 members, is the world's largest organization of basic scientists and clinicians who study the brain and nervous system. SfN owns and publishes *The Journal of Neuroscience*, a weekly peer-reviewed publication that publishes more than 1,100 top-cited research articles in the field every year.

The Society for Neuroscience supports the principle of enhanced public access to research funded not only by NIH but also by all funding agencies worldwide. Currently, free access to *The Journal of Neuroscience* is available 12 months after publication through the journal's web-based archive at HighWire Press (Stanford University). Beginning January 1, 2005, all *Journal* back issues, from volume 1 (January 1981) to volume 24 (January 2004), will be freely accessible to the public.

Although the Society for Neuroscience supports the principle of enhancing access to research, the Society wishes to comment on the difficulties involved in using PubMed Central as the digital repository of NIH-funded research results. We understand that this repository would become the vehicle for providing public access to the proposed archive for the NIH research portfolio. However, we feel that the proposed PubMed Central repository is inadvisable and is not the best way to accomplish the NIH's objective of open access.

It is the Society's position that the proposed initiative–i.e., that papers would be deposited upon acceptance in PubMed Central and would, 6 months later, become freely available to the public–could weaken the integrity of published research results by possibly introducing multiple versions of articles into the system. We think it would be more efficacious for NIH to work with publishers to encourage and facilitate a new standard of 6-month access control for biomedical journals, and to offer the public a database of links to full-text articles that reside on the publishers' web sites. One method would be to use the system already in place for linking bibliographic records in PubMed to full-text content on publishers' online journals.

We strongly believe that the archive should be of the final published version, not the pre-copyedited, pre-composed, pre-tagged version of the paper that has no Digital Object Identifier (DOI), and no volume, issue, or folio data. We question the advisability of creating a public

database that duplicates journal content already archived on highly evolved sites like Stanford University's HighWire Press. Establishing a manuscript repository, in which prepublication versions of research papers are stored until release 6 months after publication, is not the optimal approach to achieving the goal of unfettered access to NIH-funded research.

The Society intends to move expeditiously to decrease the embargo period for *The Journal of Neuroscience* to 6 months after publication. Since *The Journal* appears in print and online weekly and is on a very fast publication schedule, the actual lapsed time between acceptance of a paper and publication in *The Journal* is approximately 5 weeks. The public will have free and unrestricted access to all of these papers (almost 15,000 articles) using search engines like Google and public databases like PubMed, as well as directly through *The Journal's* own website.

It is the Society's view that the most appropriate solution is for *The Journal of Neuroscience* to be managed in its digital format by the Society on its existing platform, with PubMed as the engine that will track and manage the NIH research portfolio, and with our own free access policy meeting the public's needs for access to research results published in our journal. The Society supports the idea of providing open access to the results of NIH-funded research, and plans to follow the strategy outlined above to resolve the issue of public access, while preserving *The Journal's* identity.

The Society applauds the spirit of increasing public access to science, and we would welcome the opportunity to work collaboratively with NIH. We are certain that better solutions can be found, and we would like to be included in the process of finding the best approach. This initiative should be implemented as a cooperative venture between NIH and journal publishers, who are responsible for both the peer review and the archiving of the papers that they publish. We reaffirm our commitment to ensuring that ideas and information are exchanged as rapidly and freely as possible. We look forward to participating with the NIH in the continuing evolution of scientific publishing.

Sincerely,

Carol Barnes, Ph.D.	Anne Young, M.D., Ph.D.	Stephen F. Heinemann, Ph.D.
President	Past President	President Elect