

**Subject: Response to the Office of Science and Technology Policy Request for Information: Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research**

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Response to the Office of Science and Technology Policy Request for Information: Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research

(1) Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research? How can policies for archiving publications and making them publically accessible be used to grow the economy and improve the productivity of the scientific enterprise? What are the relative costs and benefits of such policies? What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

The expertise for delivering content already exists and agencies need to work with publishers to facilitate access without undermining the economy and productivity resulting from the access of research papers through the publishing industry. The value of access is diminished without the process of peer-review and moulding of content that the scientific/medical community have adopted and publishers facilitate and support. As such we help facilitate access to what is important. As a publisher of learned medical information we strive to serve the healthcare professionals in academia and industry by disseminating content that helps them explore, fuel discovery, or enhance patient care. We are committed to the wide dissemination of content and the delivery of electronic research information for medical and academic institutions, and corporations globally. As a leading publisher we continue to invest in the development of services and technological advances that makes dissemination and interlinking of content possible. The current access to important content

<http://www.publishingresearch.net/projects.htm> (Access vs. Importance) is fuelled by the publishing industry, an existing economy, supporting review and dissemination of scientific publication for subsequent scientific and medical progress. Undermining these existing services potentially undermine the development of expertise and incentive of publishers to continue to invest in a rapidly changing digital world that seems essential for the stimulation of competitive future economic growth.

(2) What specific steps can be taken to protect the intellectual property interests of publishers, scientists, Federal agencies, and other stakeholders involved with the publication and dissemination of peer-reviewed scholarly publications resulting from federally funded scientific research? Conversely, are there policies that should not be adopted with respect to public access to peer-reviewed scholarly publications so as not to undermine any intellectual property rights of publishers, scientists, Federal agencies, and other stakeholders?

There are a number of existing publishing models for dissemination of research papers: from subscription, to author pays open access, licensing of content, and deposit to repositories. These will continue to evolve, but they must be sustainable and financially viable forums, and one size will not fit all scientific/medical disciplines. Publishers have invested in the development of services and technological advances that makes review, dissemination and

interlinking of content possible, and will need to continue to do so in a rapidly changing digital world. The value added by publishers does not begin and end with the finished published version of record of a paper, but begins with the ease by which articles are submitted online for consideration to an indeterminate end (as articles are increasingly supplemented with additional material including reference to data that a paper is based on), and of course they are contained within databases interrogated by systems that allows efficient identification of important research. Appropriating published articles derived from data and research reports would undermine the value of originality that is important to publishers in a competitive market, and subsequently the income derived that is required to support peer-review, dissemination and investment.

(3) What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

Aggregation and linking of content already exists through the services provided by individual publishers and aggregators of content from multiple publishers, and cooperation between publishers. Preservation and correction of the publication record defines the role publishers have played from their formation, and initiatives such as Portico and CLOCKSS provide preservation insurance. Publishers have invested in digitalising archives of content back through decades and even centuries, and it is part of their *raison d'être* to maintain the publication record now and in the future. Cross reference of published material is through an organization founded by publishers, Crossref ([www.crossref.org](http://www.crossref.org)), and establishment of digital object identifiers provide unique labels for papers in a burgeoning internet. Decentralisation of content provides incentives for competition between publishers as systems are developed for competitive advantage to drive accessibility and usage; a centralised system would not have that competition and there would be less incentive to be innovative. Innovation has catapulted a number of technological companies, and in a global market that needs to be preserved if one country is to compete against another.

(6) How can Federal agencies that fund science maximize the benefit of public access policies to U.S. taxpayers, and their investment in the peer-reviewed literature, while minimizing burden and costs for stakeholders, including awardee institutions, scientists, publishers, Federal agencies, and libraries?

The expertise for delivering content already exists and agencies need to work with publishers to facilitate access without undermining the economy and productivity resulting from the access of research papers through the publishing industry. Publishers already make that investment in peer-reviewed literature as we work with the scientific/medical communities to establish mechanisms, processes, and financially sustainable publication models to publish important research. Why do the same? And what would be the incentive to develop those services when innovation and progress is already being driven in an external, competitive, and evolving market that already includes a number of publication models from subscription to authors pays. Making original research reports required by Federal agencies freely available may be a simple way of achieving “public access”, as distinct from the published research paper that is derivative of the work.

(7) Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

No. As publishers we invest heavily in all types of content we produce, whether they are journals or books, and the same principles of financial sustainability of a product would apply. The availability of some content that would be freely available for “public access” would undermine viability, the investment and value added by the publisher to a product, and value of the content to the scientific community we would aim to serve.

(8) What is the appropriate embargo period after publication before the public is granted free access to the full content of peer-reviewed scholarly publications resulting from federally funded research? Please describe the empirical basis for the recommended embargo period. Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence-based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

There is no “appropriate” embargo period. An embargo effectively shortens the life and value of an article to a publisher who has invested in its peer-review and delivery, and as such reduces the return on investment and incentive to continue to invest for the future. Publishers should be able to determine these embargo periods themselves based on the return on investment and taking into consideration the differing half-lives for various markets and disciplines.

Yours sincerely

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