

I am sending this message in response to the RFI issued by the Office of Science and Technology Policy concerning public access to peer-reviewed scholarly publications resulting from federally funded research (Federal Register, v. 74, issue 214, November 4, 2011).

I'll begin my response by saying that I strongly believe that information, especially journal articles, resulting from federally funded research should be made publically available immediately upon publication. As a tax-paying citizen, I think I should have timely access to the information generated with my tax dollars. My responses to specific questions in the RFI are as follows:

Question 1:

- Grow existing and new markets – Making the information in journal articles freely available and fully usable will enable people to develop new products and services based on that knowledge. Having the information available quickly, with little or no embargo, will help accelerate the development of these new products and services.
- Improving the productivity of the scientific enterprise – Much research has been done over the past two decades on how discoveries are made and what can be done to accelerate the research and discovery process. The research shows that freely sharing information can greatly accelerate discovery and increase research productivity. For example, in a paper entitled *The Value of Openness in Scientific Problem Solving*, Karim Lakhani from the Harvard Business School says that “Openness and unrestricted information sharing amongst scientists...are critical to scientific progress.” He promotes the value of sharing information freely across disciplines because discoveries are often made at the periphery of a discipline by people who look at a problem very differently from traditional researchers actively studying a particular topic (www.hbs.edu/research/pdf/07-050.pdf). Michael Nielsen also discusses the value of freely sharing information in his book *Reinventing Discovery: The New Era of Networked Science*. The NIH Public Access Policy increases the flow of information and the productivity of researchers not only in academic institutions but in commercial companies as well, and similar policies for other federal funding agencies would further increase research productivity and enable important discoveries to be made more quickly.
- Cost/Benefit of policies – Government policies similar to the NIH PA Policy would make the entire research process more efficient and effective and greatly increase taxpayers' return on investment in research. Policies could be implemented in ways similar to the NIH policy, the implementation for which only costs 1/100th of 1% of the overall NIH budget. Not only is the NIH policy a cost effective method of insuring that information is freely shared, but it also provides an effective way for NIH to track the productivity/outcomes of the research it funds.
- Type of access needed – The value of providing access to information can be increased significantly if users of the information are also allowed to fully re-use the information without barriers.

Question 2:

- Protection for intellectual property – Public access policies can work within the current copyright policies. I think that federally funded authors should not be forced to relinquish copyright to their works upon publication, as the copyright should really belong to the author, or be shared between the author and the institution and/or funding agency supporting the research. Government policies should allow full use (distribution, reuse, data mining, etc.) of

information resulting from federally funded research, as this increases the value of the information and helps researchers build on that information to make further discoveries.

Question 3:

- Pros and cons of centralized and decentralized approaches – I think a centralized approach to providing access to scholarly publications resulting from federal funding is best, and that government policies should ensure that the articles are preserved and made available in standard and usable formats. NIH's PubMed Central is a good example of how a centralized approach can work well. Having multiple repositories, especially if some of them are private, would be more complicated, but could be adequate if they follow standards for access and use, and are not dark archives.

Question 6

- Maximizing benefits of policies while minimizing burdens – Standardized and consistent policies can result in data compilation that can be used to help institutions as well as the federal agencies better assess research productivity. The burdens of complying with the policies can be minimized if the policy requirements are standardized across agencies and consistent over a significant period of time.

Question 7

- Other materials – Yes, other types of publications based on federally funded research should be covered by government policies so they, too, can be freely accessible. I realize these types of publications are different from journal articles for which authors normally do not get paid, so the policies for them might need to be different from those covering journal articles.

Question 8

- Embargos – Ideally, publications resulting from federally funded research should be available to the public immediately upon publication. The current NIH PA policy allows a twelve-month embargo to help publishers protect their subscription income, and some of the funding agencies in Europe allow only a six-month embargo. I can find no evidence that these embargos have hurt publishers' subscription revenues, so I recommend an embargo period no longer than six months. Even an embargo period six months long will have a significant impact on the speed with which new discoveries are made.
- I have eliminated 15 positions (12.5 FTE's, 25% of our entire staff) in my library in the past ten years to help pay for the increasing cost of journals and databases. Despite the shifting of some personnel money to the journal budget, my library has been forced to cut journal subscriptions nearly every year because of increased subscription costs, including cutting 780 subscriptions (17% of our total subscriptions) this year alone. The embargo period was not one of the major factors we considered in determining which journals to cut. We looked at usage statistics, price and price history (if journal costs keep rising significantly every year, it's not sustainable) faculty and student input, subject coverage (what else we subscribed to in the same disciplines), the impact that our cancellations will have on other libraries in our group purchases, whether journals are part of a package and/or can be purchased individually, etc. Embargo periods have

had little if any impact on the journal cancellations in my library, which is the only academic health sciences library in my state.

- Having different embargo periods for journals in different disciplines could get complicated and confusing for researchers.

In summary, I strongly support and applaud the government's efforts to ensure broad public access to, and preservation of, peer-reviewed information resulting from federally funded research. I fervently hope that the National Science and Technology Council's Task Force on Public Access to Scholarly Publications will support expanding these efforts to more federal agencies. Thank you for giving us the opportunity to comment on this issue.

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