



SEPM Society for Sedimentary Geology

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publicaccess@ostp.gov.
Dear OSTP OA RFI,

This letter contains the official response of SEPM Society for Sedimentary Geology (www.sepm.org), which is and has been since 1927 a non-profit publisher of research journals and special publications about sedimentary geology. The responses are based on discussions by the elected, ruling body of the society, the SEPM Council, and compiled by the Executive Director. From an overview perspective, the society leaders are very concerned about the impact on non-profit society publishers if an unfunded federal mandate is forced upon the publishing community without a well thought out transition from the currently dominant 'subscription' financial model to an open access 'author pays' model in order to reach the goal of an open access mandate for federally funded research. While the time to discuss RFI was very short and the interval included the major winter holiday season, where many people are not easily available, SEPM leaders have tried to address the questions posed in the RFI. There are always unintended consequences of any mandate and we hope that this topic will have continued open and thoughtful discussions which need to include all of the stakeholders involved.

Sincerely,

Howard E. Harper, Jr.
Executive Director
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Specific Responses to Questions (in bold)

The Task Force is now seeking additional insight from “non-Federal stakeholders, including the public, universities, nonprofit and for-profit publishers, libraries, federally funded and non-federally funded research scientists, and other organizations and institutions with a stake in long-term preservation and access to the results of federally funded research,” as described in Section 103(b)(6) of the ACRA. Specifically, OSTP seeks further public comment on the questions listed below, on behalf of the Task Force:

(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?

There will be little affect in the US - professional top level researchers today al-

ready have direct access one way or another via personal or library subscriptions or e-prints; professional researchers at smaller institutions also have good access via inter-library loan or e-prints for those articles they cannot access directly but they will have a larger financial hurdle to publish if the author pays financial model for open access publication becomes the dominant financial model for publishers. Finally, 'amateur' scientists, which would have the least direct access but can always request e-prints, are a very small % of this scientific enterprise.

What are the relative costs and benefits of such policies?

Free access has costs – someone still has to pay for all the creation and production costs of the publications. If there is no longer cost recovery from journal subscriptions revenues (all articles are free), then the federal government will have to pay for its mandate one way or another. Either authors pay from their federal grants thus grants will need to be larger to get the same amount of 'research' per dollar, or some type of separate grant program would be needed to fund publishers directly. The main benefits are only political - the government can claim they are giving more 'stuff' to the tax payers, but is it useful 'stuff' for the average tax payer?

What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

Overall public access really means global access - so would it help or hurt the US economy and markets and jobs? Other countries around the world, whether friendly or not, could freely access the results of US funded research and build on it, with no revenues or benefits returning to the US. Intellectual property rights are difficult to enforce now without 'open access'.

(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?

Most non-profit publishers, such as SEPM, do not copyright or license material for financial gain but rather to protect the scientific integrity of the material and guard against misuse. Permissions to re-use the material are required mostly to track who and how it will be used.

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?

Most research is done under specific intellectual property contracts or rules, whether at an academic institution, federal institution or commercial enterprise and should not be violated. The mixing of funding from several sources as some researchers do and any federal mandate on publication will of course complicate the matter legally. These issues are in the legal area and are not really addressable by SEPM.

(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?

Centrality will certainly not breed improvement - it will more likely stagnate after the initial implementation and become too big to change quickly or cost efficiently. Currently there are often multiple ways to access online research articles and this has been created by needs of the market place. Forcing centrality is non-productive.

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?

No Federal agency should try to maintain custody, particularly since not all published content is federally funded and history has shown that large scale federal efforts are both poorly managed and overly expensive. Non-profits efforts have many success stories and have rules to pass on assets to other non-profits if they disappear. Commercial publishers treat them as assets with value both now and for the future. There are also non-profit efforts such as LOCKSS and CLOCKSS and JSTOR, which are specifically archiving online publications. Again the market place is currently dealing with such issues.

(4) Are there models or new ideas for public-private partnerships that take advantage of existing publisher archives and encourage innovation in accessibility and interoperability, while ensuring long-term stewardship of the results of federally funded research?

Several non-profit aggregates are successful (GeoScienceWorld, BioOne, JSTOR) and there are specific archiving efforts (see CLOCKSS). But how adequate funding will be maintained in free access - who pays - is still the main question. Federal funding agencies will have to include 'publication' costs in new and existing grants in order to fund the federal mandate or make grants to non-profit efforts to keep them going when subscription revenue disappears.

(5) What steps can be taken by Federal agencies, publishers, and/or scholarly and professional societies to encourage interoperable search, discovery, and analysis capacity across disciplines and archives?

This is really a non-issue in the online world today. Google, Bing, Yahoo, Adobe, xml, html, etc. - the market place forces interoperability and updating.

What are the minimum core metadata for scholarly publications that must be made?

This is a more detailed technical question - however we believe the minimum is small and involves - titles, authors, abstracts, grant number, doi. These are now usually included in articles. CrossRef (another non-profit) might make a good partner for 'look-up'.(see #4).

How should Federal agencies make certain that such minimum core metadata associated with peer-reviewed publications resulting from federally funded scientific research are publicly available to ensure that these publications can be easily found and linked to Federal science funding?

Federal agencies don't have too - again market place forces it. (see CrossRef).

(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 simplest option is to add funding to every grant in order to pay the publication costs (author pays). However, be prepared for less research to be done per dollar and global access to result in decreased US competitiveness in research. Also be prepared for the

costs to go up--more federal money means there is more incentive for others to find ways to get some of that money from the pathway to publication. This will mean a need for policing how any publication funds are calculated within grants and how they are used.

(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?

Basically 'no' – in geology and across many sciences the non-journal publications content is highly variable. Conference proceedings are not really peer reviewed. Many books do not contain first published research comparable to research journals, but some edited and peer reviewed research volumes do contain such material. So either those types of books (containing peer-reviewed research results) are covered, or federally funded research will not be allowed to appear in such books. Losing such content would have a negative impact on the financials of all non-profit scientific publishing societies. Science book publications are also still strong in producing print versions, which makes 'open access' are much more complicated issue.

(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?

If each publication is fully funded via author grants, no embargo period is needed. However, if not fully funded, each scientific field is likely to define an embargo that would allow subscription revenue to pay for initial publication costs followed by a free access period. Some publishers do this already (make archives freely available), most do not as maintaining online access databases of older articles has its own costs.

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?

While there are definitely varying 'shelf' lives for different sciences this is a non-question if question 8 is answered with full funding. An embargo period is only needed if there is no funding to publish the work in free access or if some publication funding model is used that supplies only a fraction of the actual publication costs. Those options force a combination of early subscription funding followed by partial cost recovery from federal funding. This will result in an embargo period which balances the two revenue sources. The smaller the federal funding the longer the embargo and it will change based on changes in the subscription funding and costs through time.

A citation based numeric used for geoscience literature to identify useful shelf life is 8 years.

Please identify any other items the Task Force might consider for Federal policies related to public access to peer reviewed scholarly publications resulting from federally supported research. Response to this RFI is voluntary. Responders are free to address any or all the above items, as well as provide additional information that they think is relevant to developing policies consistent with increased public access to peer-reviewed scholarly publications resulting from federally funded research. Please note that the U.S. Government will not pay for response preparation or for the use of any information contained in the response.

From the viewpoint of the leaders in our organization, public access to their work is a non-issue and is seen as a complication to their ability to continue to publish their work without regard to their individual financial situation. The vast majority of online science publishers whether commercial or non-profit make titles, authors and abstract metadata freely available. This is the basic amount of information that is relevant to most of the public.

Once an article of interest is found - anyone can contact an author for an e-print - given freely or often posted for free downloading on author pages for any individual that requests it. While this might be slightly more work - two added steps once an article is found (1. contact author 2. download or receive e-print from author) - this time honored system, developed long ago in the print only world, makes any modern science article available to anyone without charge (free access but not instantaneous). Libraries, public and private, use inter-library loan to handle situations when authors are no longer available. Non-profits offer very inexpensive pay-per-view options (a few dollars to a few 10s of dollars) to access articles from their sites for faster access. Perhaps a simple solution is to try to set some nominal fee (\$15) for this type of access for federally funded articles.