The Association of Learned and Professional Society Publishers
Shaping the Future of Learned and Professional Publishing

ALPSP
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ALPSP response to Office of Science and Technology Policy - Public Access Policy consultation

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January 2010

Office of Science and Technology Policy consultation on Public Access Policy

Introduction

1. The Association of Learned and Professional Society Publishers (ALPSP) is the international organization for non-profit publishers and the world's largest association for scholarly and professional publishers. It is the only international trade association that represents scholarly and professional publishers across all disciplines of academic endeavor. ALPSP has a broad and diverse membership of over 350 organizations with around 60 of those based in the USA. We have members in 37 countries who collectively publish over half of the world's total active journals as well as books, databases and other products. ALPSP's mission is to connect, train and inform the scholarly and professional publishing community and to play an active part in shaping the future of academic and scholarly communication.

2. We therefore welcome the opportunity given by the Office of Science and Technology Policy to respond to the Public Access Policy public consultation.

3. We share President Obama's aspiration of maximizing the return on Federal investments in R&D; indeed scholarly publishers are embedded in the scholarly communities that they serve and play a key and vital role in disseminating research outputs and improving research efficiency. We are supportive of the widest possible dissemination of research outputs while realizing that the scholarly publishing process in totality must meet the needs of researchers (the primary users of this material) and be underpinned by viable and sustainable business models.

4. It is clear from many of the comments submitted to this consultation that the value added by scholarly publishers is recognized which is why many are calling for the final, publisher version of peer-reviewed articles (the 'Version of Record') to be subject to a public access policy. However, we are extremely concerned that those calling for these articles to be made freely available on the web with short embargoes, or no embargo at all, do not realize the likely deleterious impact on publishers of this course of action which will undermine the scholarly publishing process.

5. We understand that the Administration favors evidence-based policy and OSTP will be aware that there is a paucity of reliable research data regarding public access to the scholarly literature. ALPSP supports the PEER project (Publishing and the Ecology of European Research; see http://www.peerproject.eu/about/) as one example of a cooperative research study involving a number of stakeholder groups that will provide much needed evidence on the situation in Europe. We encourage a similar study in the United States, again involving the various stakeholders, to inform OSTP policy in this area.

6. In responding to this consultation we have answered only those questions which are relevant to the ALPSP membership.

Question 1: How do authors, primary and secondary publishers, libraries, universities, and the federal government contribute to the development and dissemination of peer reviewed papers arising from federal funds now, and how might this change under a public access policy?

7. This question presupposes that there is peer-reviewed literature to subject to a public access policy so it is vital that any such policy does not undermine the scholarly publishing system that manages peer review via investment in the journals, editorial boards, editorial office management systems, etc.

8. Publishers play a critical role in the certification, validation and dissemination of research outputs. They organize and operate efficient and streamlined systems of peer review which, combined with the brands, quality standards and specialties of individual journals, provides a mechanism that ranks and sorts the scholarly literature. Publishers also provide a number of other value added services such as high quality production, reference checking and reference linking, and they play a crucial role in the ongoing stewardship of the "minutes of science".

Question 2: What characteristics of a public access policy would best accommodate the needs and interests of authors, primary and secondary publishers, libraries, universities, the federal government, users of scientific literature, and the public?

9. ALPSP feels strongly that publishers must be allowed to operate in a free market and to be in control of their own business models so that they can continue to innovate and to provide high quality services to the research community (scholarly journal publishing was among the first industries to embrace the internet and the world wide web). We do not believe that government should expropriate versions of scholarly material in which non-government-owned publishers have invested and added value. The system already works extremely well: the vast majority of research is available to researchers; most publishers make content available in large research or state funded libraries and include walk-in use (as well as authorized online use in some cases); many publishers already make their content freely available after suitable embargo periods on their own websites and publishing platforms; a number of "humanitarian" programs such as HINARI, INASP, AGORA, eIFL etc. provide free or almost free access to researchers in the developing world. All of this demonstrates the desire of publishers to make their content as accessible as possible to those who need the research content, within the context of a viable, sustainable and scalable business model.

Question 3: Who are the users of peer-reviewed publications arising from federal research? How do they access and use these papers now, and how might they if these papers were more accessible? Would others use these papers if they were more accessible, and for what purpose?

10. The primary users of peer-reviewed publications are academics and researchers, and overwhelmingly the peer-reviewed journal literature is now accessed online. A 2008 survey (Cox, J. and Cox, L. (2008) *Scholarly*

Publishing Practice Third Survey, ALPSP) indicated that 96% of the journals in science, technology and medicine (STM) and 87% of arts, humanities and social science (AHSS) journals were available online.

11. There is a paucity of evidence regarding demand by the public for access to the peer-reviewed literature. As publishers, who are in the business of matching products to markets, we would characterize the scientific research literature as a niche market, not a mass market. However, we encourage additional research to assess the level of demand and the purpose of access to the peer-reviewed literature by the public so that the most appropriate and cost-effective solutions can be found.

Question 4: How best could Federal agencies enhance public access to the peer-reviewed papers that arise from their research funds? What measures could agencies use to gauge whether there is increased return on federal investment gained by expanded access?

12. Federal agencies should work with publishers to (i) assess the demand for peer-reviewed papers among the public, bearing in mind that the requirement will vary greatly from one discipline of scholarly endeavor to another, and (ii) find appropriate methods of closing any access gaps by working cooperatively with all stakeholders including publishers, libraries and research communities.

13. We believe it is important to be able to understand the total usage of scholarly material and to this end online repositories such as PubMed Central should share detailed usage statistics to help assess the "increased return" as well as the extent to which the users (which will include researchers in academia, industry, government, IGOs and NGOs, those working in small businesses as well as the general public) of Federally funded repositories overlap with those using publishers' sites.

Question 5: What features does a public access policy need to have to ensure compliance?

14. Evidence suggests that both users and authors want access to be to the publisher's final Version of Record. In the online environment, we believe that publishers are best placed to be the custodians of this version of the article and that access should preferably be provided by a link to publisher websites.

15. Whatever the public access policy, compliance needs to be supported by a clear funding mechanism so that publishers are able to recover their investments in producing the Version of Record.

Question 6: What version of the paper should be made public under a public access policy (e.g., the author's peer reviewed manuscript or the final published version)? What are the relative advantages and disadvantages to different versions of a scientific paper?

16. The options presented in this question are both limited and leading. We do not understand why the question ignores another obvious option – that the research output which should be made public is the *research project report*. This is the output that the funding body has paid for.

17. Federal research grants pay for research, not the publication of research. Research publications benefit from publisher added value; from technical processes such as copy editing, typesetting, reference linking, etc.; and, crucially, from the association with a journal's brand that helps guide users to trustworthy content and improves research efficiency. This value add has *not* been paid for by the funding body, except in the case of so-called "Gold Road" open-access payments.

18. At a system-wide scale, peer review of the journal literature is not a binary process – i.e., a mechanism through which a paper has either passed peer review or has not. Rather, the range in quality and specialty of journals provides an important, if coarse, ranking and filter on the literature. The same peer reviewers could well accept a manuscript for one journal but reject it for another either based on the quality standards of the journal, its subject coverage or niche, aims and scope etc. Readers therefore get a great deal of information about an article by its association with a particular journal before they even read a word; it gives an indication of what they are likely to find and this greatly aids research efficiency.

19. It is impossible to say as a general rule whether or to what extent different versions of an article may vary. They may not vary at all (e.g. if the author submits a perfect article that requires no editorial intervention); they may vary trivially (e.g. if the article just receives "house-style" editing); or they may vary profoundly (e.g. if an article needs intensive editing, is incomplete or incorrect, etc.). There is a continuum of editing levels, and without detailed version-to-version comparisons, you cannot tell whether an accepted article differs greatly from the published version or not. But all accepted versions, even those that have no editorial amendments, benefit from the journal "brand" conferred upon them and the status of being accepted for publication – a status that arises from the publisher's investments that we have referred to above.

Question 7: At what point in time should peer-reviewed papers be made public via a public access policy relative to the date a publisher releases the final version? Are there empirical data to support an optimal length of time? Should the delay period be the same or vary for levels of access (e.g. final peer reviewed manuscript or final published article, access under fair use versus alternative license), for federal agencies and scientific disciplines?

20. We believe that publishers should determine the business models on which their publications operate and this should include whether the final peer-reviewed manuscript or final published article are made freely available on the open web, and if so, after what embargo period. The optimal embargo period will, undoubtedly, vary greatly from discipline to discipline (as evidenced by the wide variation in citation half-lives across different subject specialties, see http://www.isiwebofknowledge.com/).

21. One size does not fit all. Publishing is an activity that supports scholarly disciplines and these disciplines have very different mores; different kinds of funding mechanisms, different lengths of time to publication, different citation half-lives, etc. There is enormous variability within the physical and health sciences, mathematics, engineering, etc. and even more when the social sciences, humanities and arts are included.

Question 8: How should peer-reviewed papers arising from federal investment be made publicly available? In what format should the data be submitted in order to make it easy to search, find, and retrieve and to make it easy for others to link to it? Are there existing digital standards for archiving and interoperability to maximize public benefit? How are these anticipated to change?

22. Although there is federal investment in the research itself, there is no "federal investment" in managing the peer review process, nor in launching, developing and promoting journals, nor in the added value that takes an article from Accepted Manuscript to Version of Record, nor in the post-publication stewardship of that Version of Record. We believe that the solutions to the issues that you highlight in the question will, and should, primarily emerge from the private sector (which includes, of course, a very large number of non-profit society publishers). Digital standards for interoperability and preservation are still emerging, but we would draw attention to initiatives like CrossRef (see http://www.crossref.org/) and Portico (http://portico.org/) as successful, efficient, industry-led examples of broadly adopted solutions.

23. It is important to note that the value added by publishers in addition to peer review (e.g. reference linking, search optimization etc.) have associated costs that still need to be met even if publishers themselves are driven out of the system. It is at best naive and at worst duplicitous, and thus wasteful of time and money that would be better off going to research, to replicate for publicly available content the work that publishers are already doing in this regard.

Question 9: Access demands not only availability, but also meaningful usability. How can the Federal government make its collections of peer-reviewed papers more useful to the American public? By what metrics (e.g. number of articles or visitors) should the Federal government measure success of its public access collections? What are the best examples of usability in the private sector (both domestic and international)? And, what makes them exceptional? Should those who access papers be given the opportunity to comment or provide feedback?

24. Publishers invest time and money in making their content usable. We do not believe that crude metrics like the number of downloads or visitors will be enlightening measures of success. To properly assess the impact of a public access policy we believe that the Federal government should assess who is accessing content and for what purpose, as well as determine how useful the content was to the user and the impact that the content had on the user's aims. As mentioned earlier, we call for detailed usage information from public repositories to be shared with publishers.

25. It should also be noted that many publishers provide public engagement services, where information that has appeared in the scientific literature is digested and reproduced in a friendly format for the non-specialist public user. Access to primary articles for the general public is unlikely to be of benefit in most cases.

Summary

26. In summary, ALPSP:

- Believes that publishers should be allowed to control their own business models without the government expropriation of value added by private organizations.
- Encourages additional research to assess the level of demand and purpose of access to the peer-reviewed literature by researchers and the public so that the most appropriate and cost-effective solution can be found.
- Suggests that the United States should instigate a large-scale, cooperative research study involving relevant stakeholders (akin to the PEER project in Europe) to gather evidence to inform OSTP policy in this area.
- Asserts that the system of peer-reviewed journals greatly assists research efficiency and suggests that Federal agencies work with publishers to find acceptable policies for public access that do not have a deleterious impact on publishers' ability to add this value.
- Publishers should determine if and when versions of the article to which they have added value should be made freely available and this will vary greatly depending on the needs of different research disciplines.

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