April 23, 2004

Dr. Elias Zerhouni  
Director  
National Institutes of Health  
9000 Rockville Pike  
Bethesda, MD 20892

Dear Dr. Zerhouni:

We are writing to you as signatories of the Washington DC Principles for Free Access to Science—a statement representing 50 not-for-profit publishers and over 600,000 scientists and clinicians of the nation's leading not-for-profit medical and scientific societies and publishers. During this time of considerable interest and debate over the policies regarding the dissemination of research conducted with federal funding, we would like to state our serious reservations about the costs and impact of so-called "open access" publishing models on nonprofit scientific and medical publishers.

We are aware that, both in the United States and in the United Kingdom, some organizations have urged government funding agencies to earmark a portion of grants to support publication only in open-access publications and to recommend to grantees that they favor these publications. Contrary to claims that such a mandate would benefit scientific discovery and public health, we believe it could instead undermine the quality, integrity, and sustainability of scholarly nonprofit publications. These publications include many of the most cited and influential journals available today.

It is undoubtedly true that journal prices in aggregate have climbed more sharply than the ability of academic libraries to add to their collections. However, non-profit publishers have not been the cause of this price escalation or any resulting serials crisis. The average price of a commercial scientific journal is two to four times that for a society-published journal. Librarians have long recognized that scientific and medical journals from associations and societies are a comparative bargain for the quality of science delivered.

Moreover, nonprofit publishers have been at the forefront of making content freely available online. As stated in the Washington DC Principles, we make selected important articles of interest free online from the time of publication. Moreover, the full text of our journals is freely available to everyone worldwide either immediately or within months of publication. The content of our journals is available free to scientists working in many low-income nations. Articles are made available free online through reference linking
between journals. Finally, our content is available for indexing by major search engines so that readers worldwide can easily locate information. In both pricing and policy, we have promoted the free exchange of scientific and medical information needed to support research and improved patient care.

Despite the impressive track record of nonprofit publishers, some organizations seek to effectively mandate open access publishing by encouraging or requiring recipients of federal grants to publish in open access publications. We believe that such a move is unwarranted and could undermine the ability of nonprofit organizations to maintain publishing standards and to serve our constituents and the general public.

As a novel publishing model, open access publishing seeks to transfer the cost of publication from the reader to the author. In so doing, open access publishers have set prices that do not adequately take into account the high cost of peer review and copy editing. For a selective journal that rejects 75% of submissions, the cost per published article may be a minimum of $2000, and often much more. Proposed open access author fees of $500-1500 could therefore erode the quality of scientific journals and peer review that contributes to their strength.

Moreover, any profits that nonprofit associations and societies receive from publishing are reinvested in the direct support of science worldwide, including scholarships, scientific meetings, grants, educational outreach, advocacy for research funding, the free dissemination of information for the public, and improvements in scientific publishing. Jeopardizing nonprofit publishing by mandating open access may therefore be a net loss for science.

Open access may also threaten proven scientific publishing models by effectively eviscerating copyright protection. Under statements such as the Bethesda Statement on Open Access Publishing, authors nominally retain copyright, but are required to make a sweeping grant of rights that allow any party, nonprofit or commercial, to publish the work or any derivation of it in any medium. Such a surrender of traditional copyright protections opens the door to the misrepresentation and commercial exploitation of a work, undermining the integrity of the scientific literature. By contrast, nonprofit publishers carefully guard the integrity of an author’s work, even while opening it to wide access.

The claims that open access would improve public health by enabling patients to find potentially life-saving treatments are entirely theoretical and without foundation in the literature on patient care and education. A patient with breast cancer, for example, can now find comprehensive, evidence-based treatment guidelines on Web sites such as those of the National Cancer Institute or the American Cancer Society. Access to the primary biomedical literature would offer patients little, except perhaps to encourage them to focus on experimental or alternative treatments rather than on treatments validated in robust clinical trials. While we do not advocate limiting patient access to medical research, we take exception to those who claim that the average patient will benefit from a federal investment in open access publishing.
Please understand that we do not oppose open access publishing, but only its premature and unwarranted imposition through government mandate. With the maturing of Web based publishing, we are in a period of transition in which many new publishing models will emerge. We welcome this experimentation, as we do excellent open access journals such as PLoS Biology. There is no justification, however, for cutting off this blossoming of publishing options and settling on an open access model that is unproven. If we intend to support science, we should act as scientists, and await the results of the many publishing experiments now under way.

Sincerely yours,

Martin Frank, Ph.D.
Coordinator, DC Principles Coalition
Executive Director, American Physiological Society
9650 Rockville Pike, Bethesda, MD 20814

Peter Banks
Publisher, American Diabetes Association
1701 North Beauregard Street, Alexandria, VA 22311

Lenne P. Miller
Senior Director, Publications, The Endocrine Society
8401 Connecticut Avenue, Suite 900, Chevy Chase, MD 20815-5817