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Office of Science and Technology Policy
Attn: Open Government Recommendations
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January 21, 2010

Submitted via email: publicaccess@ostp.gov

American Institute of Physics response to Office of Science and Technology Policy Request for Information on Public Access Policies for Science and Technology Funding Agencies Across the Federal Government

On behalf of the American Institute of Physics (AIP), a 501(c)(3) organization, I am writing in response to the December 9, 2009 Federal Register notice soliciting comments on Public Access Policies for Science and Technology Funding Agencies Across the Federal Government. The letter expresses strong support for your efforts to promote a transparent, open federal government and urges you to continue engaging scientific publishers like AIP in the process of drafting public access policies.

As one of the world's largest publishers of physics journals, AIP plays a direct role in advancing research & development in the United States. We maintain a database with more than two million articles from nearly 200 scholarly journals owned by dozens of learned societies—a body of scientific knowledge that we continuously improve and make available to any reader in the world 24 hours a day. Our activities extend well beyond publishing. AIP is also an umbrella organization that represents 10 scientific societies whose membership includes approximately 137,000 scientists, engineers, and educators. Created in 1931, to advance and diffuse the knowledge of physics and its application to human welfare, AIP reinvests its journal revenue back into this community in the form of scholarships, grants, educational outreach, public information, and technological improvements to publishing.

As a publisher, AIP is very concerned about improper public access policies that could potentially threaten the future of scientific and engineering organizations that advance national interests. We believe that a balance may be struck between improving access and sustaining the scholarly publishing industry and the values that it brings to American society. That balance has its underpinnings in certain shared principles such as the importance of peer review, the recognition of economic realities based on adaptable and viable business models, the need to ensure secure archiving and preservation of scholarly information, and the desirability of broad access. One way to achieve this balance is to engage in a sensible, flexible, and cautious approach to drafting public access policies—an approach that engages all affected parties, including federal agencies, scientists, university administrators, librarians, publishers, and the public.

The early fruits of this approach can be found in the January 12, 2010 report issued by the Scholarly Publishing Roundtable, a group convened by the House Committee

Member Societies

American Physical Society

Optical Society of America

Acoustical Society of America

The Society of Rheology

American Association of
Physics Teachers

American Crystallographic
Association

American Astronomical Society

American Association of
Physicists in Medicine

AVS The Science & Technology
Society

American Geophysical Union

Other Member Organizations

Sigma Pi Sigma Physics
Honor Society

Society of Physics Students

Corporate Associates

on Science and Technology to address the broad issues of public access. The report does not recommend any specific regulatory or legislative solution, but instead advocates flexibility for the quickly evolving publishing enterprise and urges that the collaboration of all stakeholders be involved as solutions are developed and implemented

Results of the Scholarly Publishing Roundtable

Because of my experience as the executive director and CEO of AIP, I was honored to participate in the Roundtable discussions that led to the recent report. The Roundtable made a number of recommendations involving public access policies—calling on OSTP, for instance, to establish its own public access committee to advise it on these issues and, going forward, to monitor the impacts of public access policies.

The report's core recommendation was that each federal agency should develop its own policy for achieving “free public access to the results of the research that it funds as soon as possible after those results have been published in a peer-reviewed journal.” To accomplish this, the report calls for agencies to work with OSTP and all other governmental and non-governmental stakeholders to develop their own public access policies.

AIP strongly supports the view that seeking a single, uniform policy or mandate is the wrong approach. One overarching government-wide policy would not accommodate the specific needs of any given agency, the rapidly changing nature of scholarly publishing, or the unique considerations of the various fields of science and the journals that serve them. For example, while the Roundtable recommends that each federal agency should establish a period of embargo between a work's first publication and the date when that article is made available without charge to the public, the Report clarifies that the length of this embargo should be agency and discipline -specific. It should also reflect an appropriate balance between a commitment to public access and the maintenance and orderly evolution of functions among established journals.

AIP also supports the finding of the Roundtable that the Version of Record (VoR) is the version to which free access should be provided. (“If the VoR is not included in a public access database, the article version or reference that is included should contain links back to the VoR on the publisher’s site.”) This recommendation preserves the integrity of the scholarly record as maintained and preserved by journals and their publishers.

Finally, the report makes the important point that public access policies should foster innovation in the archiving and use of scholarly information. Such innovation can best be done by promoting interoperability among various databases and publication platforms, which cannot be achieved by mandate, but only through collaboration among all parties.

Based on my experience with this group, I emphasize the effectiveness of the Roundtable model as a means of gathering parties from all sides of the issue, finding common ground and consensus, and laying the groundwork for finding practical solutions to the challenges of public access.

Publishing at the American Institute of Physics

As a publisher, AIP plays a central role in the process by which scientific research is developed, communicated, disseminated, and ultimately accepted by the scientific community. We publish a dozen of our own physics journals and some 200 other journals in whole or part. Articles in these journals spur the advancement of knowledge and hasten its translation to applications in immeasurable ways.

While the total societal impact of the scholarly research information we publish each year is difficult to quantify, the resources necessary to produce it are not. AIP spends approximately \$30 million annually on peer review, editorial management, and producing, printing, shipping, distributing, and hosting its archival journals on a fully-digital, highly-reliable online platform so that they are available 24 hours a day to customers around the world in more than 70 countries. Whether an article is read online or in print, high-quality peer review, page composition, copyediting, and the listing and linking of bibliographic and reference data must be managed—part of the reason why we employ some 300 staff at our Melville, New York publishing center as well as more than 70 editors around the world. Our editors maintain the quality and reputations of our journals through the well-established system of peer review, whereby independent experts review submitted articles. Accepted articles are those that pass muster based on criteria including novelty and the substantial nature of the research findings. Managing peer review for the nearly 29,000 papers submitted to AIP journals every year is a complex undertaking. It requires a large amount of sophisticated electronic resources, associated support personnel, our professional editors—nearly all Ph.D. physicists—and help from tens of thousands of referees. Peer review encourages authors to meet the accepted standards of their discipline, helps to prevent the dissemination of unsubstantiated claims, and ultimately ensures the integrity of scientific information. It is universally accepted among scientists that peer review protects the scientific process.

To meet the market's increasing demand for easily accessible, quality information, AIP spends a considerable amount of money investing in new technologies for viewing and sharing our journals. Our Scitation™ platform (<http://scitation.aip.org/>) is one of the largest and most popular web sites providing high-quality information for physical scientists and engineers. In 2009, our subscribers made more than 20 million full text downloads from this site. In just the last year, we developed a mobile phone reader for our journals, a professional social networking site for physical scientists, and an electronic book platform for our book content. We also launched an innovative new journal on renewable energy.

All these costs are largely recouped through our subscription fees, and we are continually developing options for innovative pricing, product delivery, and access. AIP and most other publishers offer variations of the open access solutions, in addition to the still dominant subscription-based models.

AIP's reliance on subscription revenue is characteristic of publishers across the industry. Studies referenced in the Roundtable report show that about 90 percent of scholarly journals rely upon subscription-based models. A rapid transition away from this dominant model could seriously damage the wholesale sustainability of the publishing enterprise. Author-pays models are untested on the large scale and may not be viable for scholarly fields in which funding is scarce.

Any public access mandate that does not allow publishers to support subscription-based models or an orderly transition to other models would threaten the sustainability of numerous journals and would reduce incentives for publishers like AIP to continue investing in our industry.

That is why AIP strongly supports the collaborative process exemplified by the Scholarly Publishing Roundtable. We ask that you consider what effects any public access policy would have on the scientific publishing industry by explicitly including representatives from our industry in your process. The consultative process begun by the Roundtable needs to continue into the future.

Thank you for the opportunity to comment on the development of an Open Government Directive. Please feel free to contact me for any additional information or discussion.

Sincerely,



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