

On behalf of the over 12,000 members of the non-profit Association for Research in Vision and Ophthalmology (ARVO) I offer our comments to the OSTP about the Scholarly Publishing Roundtable's Report and the President's mandate for transparency, openness and collaboration in research. ARVO's members are research clinicians and scientists whose focus is to identify methods, practices and devices that will promote eye and vision health and alleviate related diseases by fostering research and publication and dissemination of biomedical and medical research. As such ARVO publishes over 800 peer-reviewed research articles annually and over 6,000 abstracts of research from its Annual Meeting. Any revenues recognized by its publications are invested in further education of scientists through national and international meetings and dissemination of the information conveyed.

ARVO supports the broad concepts of the Roundtable in terms of the critical role that peer-review plays in maintaining the high quality and editorial integrity of the scientific endeavors of authors and the paramount importance of sustained archives and preservation of data. However, ARVO suggests that there are other alternatives for doing so than the Roundtable suggests. The purpose of an archive is to maintain **all** articles of record and most publishers are committed to this practice by participating in such programs as LOCKSS, CLOCKSS, arXiv, OCLC, among others.

The Roundtable suggests that federally supported content only be submitted to and archived by federal agencies. This is a costly, incomplete and duplicative solution when publishers participate in the abovementioned programs and are electronically hosted at one of the world's largest scientific sites, such as HighWire Press. It is also crucial that the version (or article) of record (VoR) referred to in the Recommendations be defined by the publisher and that other resources link to that VoR on the publishers' site provided that the site is a "trusted resource" as defined by recognized experts in the field.

Regarding access to articles of record, most publishers have a free and open access policy for articles ranging from 3 months to 12 months after publication of the article of record, as does ARVO. Many publishers have also provided all historical content for their journals at little or no cost to readers, researchers and the public.

ARVO and HighWire have adopted the NLM DTD as a recognized method of ensuring interoperability among sites and encourage others to do so. This interoperability does come with responsibilities: to maintain the scientific integrity of the articles which the authors have entrusted to the journals being paramount. We have serious concerns about the suggested "creative reuse" and the significant potential misuse of content and for copyright infringement, historically a fundamental legal right of authors and publishers.

ARVO supports the Roundtable's recommendations to establish full and open consultation with all stakeholders, as well as with OSTP, to develop **appropriate** access policies and establish embargo periods that reflect a balance for the scientific discipline. Consideration should be given to the Immediacy Index and the Cited Half-Life of the content in that discipline. With longer half-lives, such as ARVO's journals (over 6 years), the value of the research leading to clinical applications and quality of life and health improvements should be examined and respected.

Establishment of an Advisory Committee to assess growth and changes in scholarly publishing, provide discussion forums for all stakeholders, and an independent evaluation of best practices and policies affecting all is an essential component to this proposal.

Thank you for the opportunity to comment and to participate in this process. ARVO looks forward to continued discussions and participation as a stakeholder representing research scientists around the world.

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