



Federation of American Societies for Experimental Biology

— *Quality Life Through Research* —

Member Societies

The American Physiological Society
American Society for Biochemistry and
Molecular Biology
American Society for Pharmacology and
Experimental Therapeutics
American Society for Investigative
Pathology
American Society for Nutrition
The American Association of
Immunologists
American Association of Anatomists
The Protein Society
Society for Developmental Biology
American Peptide Society
Association of Biomolecular Resource
Facilities
The American Society for Bone and
Mineral Research
American Society for Clinical
Investigation
Society for the Study of Reproduction
Teratology Society
The Endocrine Society
The American Society of Human
Genetics
Environmental Mutagen Society
International Society for
Computational Biology
American College of Sports Medicine
Biomedical Engineering Society
Genetics Society of America
American Federation for Medical
Research

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January 22, 2010

Office of Science and Technology Policy
Attn: Open Government Recommendations
725 17th Street, NW
Washington, DC 20502

VIA EMAIL TO: publicaccess@ostp.gov

Dear Office of Science and Technology Policy:

The Federation of American Societies for Experimental Biology (FASEB) is comprised of 23 independent scientific organizations, which represent over 90,000 scientists, and strongly supports the goal of increasing access to information that stimulates scientific and technological innovation. FASEB and its member societies are actively engaged in the process of disseminating scientific information, including the publication of nearly 60 journals. Moreover, FASEB and its member societies are leaders in broadening access to peer reviewed scientific literature, having pioneered many innovations in the use of online publication and the development of electronic archives of print publications. However, FASEB recommends against adopting a “one size fits all” program in this complex area and urges the Office of Science and Technology Policy (OSTP) to consider carefully both the issues raised below and the views of our member societies, many of which will be submitting comments based on their individual publishing experience.

One of the most vital contributions of scholarly journals is the coordination of the peer review process. Peer review has helped to establish standards of excellence respected by readers around the globe. The overwhelming majority of the manuscripts submitted to a given scientific journal are not published by that journal. Therefore, journals must finance the collection and review of several times as many manuscripts as they will ever publish, effectively acting as guardians for the integrity of scientific literature. The review process is an essential quality control mechanism that helps to ensure the veracity of published research reports in addition to facilitating communication through enhanced readability. We oppose publication of multiple versions of the same manuscript, as this will confuse and, in some cases, may even corrupt the scientific record. We urge the government to work with publishers to provide public access directly from the article of record in the journal by providing links back to the content.

A diversity of business models are employed to finance the coordination of peer review and the many other value-adding services rendered by scientific publishers. These models include “author-pays all immediate open access” and hybrid “author-pays and subscription-based” approaches. At this time, however, it is not certain which business models will be viable over the long-term, and therefore we strongly

urge that the federal government refrain from mandating public access requirements for articles published in peer reviewed journals. Such regulation is unnecessary, costly, and will limit innovation by mandating a single set of practices in a rapidly changing field.

There are many ways by which the federal government can help to ensure public access to information. Change in the system of scientific publication, a system that adds great value to the scientific record, needs to be derived from a careful analysis of the potential costs and benefits. Since the NIH policy is being considered for expansion to other federal research-funding departments, agencies, and offices, it would be critical to have an impartial analysis (e.g. National Academies) of the policy's impact. This is not the time to establish regulations in this rapidly evolving field, and we strongly urge that OSTP refrain from mandating how not-for-profit scientific publishers disseminate a rigorously peer reviewed scientific literature.

Sincerely,

A handwritten signature in blue ink that reads "Mark O. Lively". The signature is written in a cursive style with a large, stylized "L" and "y".

Mark O. Lively, Ph.D.
FASEB President