



May 31, 2006

Yves Dumont  
European Commission, Research DG  
Scientific Advice and Governance  
SDME 6/72  
B-1049 Bruxelles

Via Email

Dear Mr. Dumont:

This memorandum presents the views of several leading North American organizations concerned with the wide, affordable, and effective dissemination of scientific and scholarly research results: the American Association of Law Libraries, the American Library Association, the Association of Academic Health Sciences Libraries, the Association of College and Research Libraries, the Association of Research Libraries, the Greater Western Library Alliance, the Medical Library Association, and SPARC (the Scholarly Publishing and Academic Resources Coalition).

Because policy development will be a key factor in determining the future costs and efficiencies of scientific publication markets, we are writing to express our support for many of the recommendations proposed by the "Study on the economic and technical evolution of the scientific publication markets in Europe." This letter focuses on the recommendations most directly relating to access to scientific information.

### **Recommendation A1**

Collectively, we wish to convey our enthusiastic support for the actions proposed in Recommendation A1 to "guarantee public access to publicly funded research results shortly after publication." The issues around public access are of great concern to the members of our associations. We have been leaders in supporting and encouraging similar actions in the United States and Canada.

We agree with much of the supporting analysis for this Recommendation in Section seven of the report, but wish to offer additional relevant information:

- While we strongly endorse the goals of the National Institutes of Health (NIH) public access policy, we want to highlight some features that are unnecessarily limiting the policy's effectiveness. We submit that the success of the NIH policy relies on making author submission mandatory and requiring that NIH-funded works are made publicly available in PubMed Central within six months of publication. These are also the recent recommendations of the NIH's own Public

Access Working Group (PAWG) and the National Library of Medicine Board of Regents.

- We are confident that reliable evidence shows that a six-month embargo poses no substantial danger to existing publishers relying on subscription-based revenues.

At this time of rapid evolution of new research communication mechanisms it is important that funding bodies apply policy practices consistent with achieving program goals.

We commend to you the approach to public access embodied in the Federal Research Public Access Act of 2006 (S.2695), introduced in the U.S. Senate earlier this month and which requires every U.S. federal agency with an annual extramural research budget of \$100 million or more to implement a public access policy that:

- Requires each researcher – funded totally or partially by the agency – to submit an electronic copy of the final manuscript that has been accepted for publication in a peer-reviewed journal.
- Ensures that the manuscript is preserved in a stable digital repository maintained by that agency or in another suitable repository that permits free public access, interoperability, and long-term preservation.
- Requires that free, online access to each taxpayer-funded manuscript be available as soon as possible, and no later than six months after the article has been published in a peer-reviewed journal.

A copy of the bill is attached.

## **Recommendation A2**

Further, our organizations strongly support the analysis in Section seven regarding journal business models and the consequent Recommendation A2 that a level playing field is needed to allow for the creation of a more competitive marketplace. The study correctly notes that funding bodies substantially subsidize subscription-based funding models, albeit largely indirectly, and should equally subsidize models using author-side payments.

Section seven of the analysis also discusses two proposed alternatives to the currently dominant subscription-based funding of scholarly journals: pay-per-use and author side payment models. While both models may introduce greater price sensitivity and hence self-regulation of journal markets, pay-per-use models do so only at the price of continued disparities in access to research and consequent losses of productivity. Open access, while perhaps less familiar, strongly reflects the historic ethos of sharing within the research community as well as the emerging norms of Internet-based communication systems. It provides the best opportunity to maximize the return on public investment in research by sweeping away virtually all access barriers. The leverage this offers in support of innovation is substantial. The resulting social and economic benefits far outweigh any modest risk to particular publishing interests.

Concerns are raised in the Study regarding the presumed potential of author-side payment models to compromise current quality standards exercised by journals. It should be noted that there is no evidence available indicating a lowering of quality standards among journals using author-side payment models. A study by the Association of Learned and Professional Publishers (ALPSP), "The Facts About Open Access Publishing" (available at <http://www.alpsp.org/publications/pub11.htm>) initially claimed to have discovered substantial reductions in peer review standards among the set of open access journals they studied, compared to the established subscription-funded journals. However, a later addendum admitted that these findings were in error and concluded that no unambiguous evidence of open access journals' lowered quality had been discovered in the study (see <http://www.alpsp.org/publications/FAOAaddendum.pdf>). Considering another line of evidence, it is notable that some journals using author-side payment models have built up citation rankings in only a few years, placing them in the top tier of journals in their field (see "The First Impact Factor for PLoS Biology—13.9" [http://www.plos.org/news/announce\\_pbioif.html](http://www.plos.org/news/announce_pbioif.html) and "Open Access Journals Get Impressive Impact Factors" <http://www.biomedcentral.com/info/about/pr-releases?pr=20050623>).

### **Recommendation A3**

Recommendation A3, 'Extended Quality' Rankings Of Scientific Journals is also quite welcome. We applaud the recognition that any definition of quality that does not enhance the quality of dissemination inhibits needed change in publishing models. The concept of 'extended quality' rankings draws helpful attention to the need to consider explicitly all of the quality dimensions funding agencies find valuable.

Fundamentally, a major thread of the study's analysis is publishers' growing use of market power to restrict access to research works as new distribution channels and new opportunities to repackage and resell content have developed. New information technologies show potential to unlock a journal market that has grown increasingly inefficient. At the same time, these technologies have opened a door for publishers to impose value-based pricing as part of the move from pay-once models, where copies of works are sold, to content-leasing models, where even previously published content can be converted to digital form where access is made contingent on ongoing payment.

### **Conclusion**

We believe the recommendations presented in this study deserve the European Commission's fullest attention. Their adoption would substantially improve access to STM research findings for scientists and many other groups who would find value in the knowledge they communicate.

We would welcome an opportunity to provide the Commission with additional comments as needed. If possible, we would like to obtain your permission to post this

document on our organization's Web sites. Please contact Jennifer Heffelfinger at +202 296 2296 ext. 121 or [jennifer@arl.org](mailto:jennifer@arl.org). Thank your for your consideration of our views.

Sincerely,



Susan Fox  
Executive Director  
American Association of Law  
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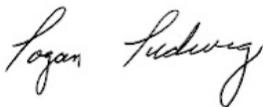
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Carla J. Funk  
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Medical Library Association



Mary Ellen Davis  
Executive Director  
Association of College and Research  
Libraries



Heather D. Joseph  
Executive Director  
SPARC

Attachments (2)

### **American Association of Law Libraries**

[www.aallnet.org](http://www.aallnet.org)

With over 5,000 members, the American Association of Law Libraries (AALL) represents law librarians and related professionals who are affiliated with and serve the nearly one million men and women working in the range of U.S. legal institutions: law firms; law schools; corporate legal departments; courts; and local, state and federal government agencies. The association was founded in 1906 to promote and enhance the value of law libraries to the legal and public communities, to foster the profession of law librarianship, and to provide leadership in the field of legal information.

### **American Library Association**

[www.ala.org](http://www.ala.org)

The American Library Association (ALA) is the oldest and largest library association in the world, with more than 65,000 members. Its mission is to provide leadership for the development, promotion and improvement of library and information services and the profession of librarianship in order to enhance learning and ensure access to information for all.

### **Association of Academic Health Sciences Libraries**

[www.aahsl.org](http://www.aahsl.org)

The Association of Academic Health Sciences Libraries (AAHSL) is composed of the directors of libraries of 142 accredited U. S. and Canadian medical schools belonging to or affiliated with the Association of American Medical Colleges. AAHSL's goals are to promote excellence in academic health science libraries and to ensure that the next generation of health practitioners is trained in information seeking skills that enhance the quality of health care delivery, education, and research. The Association influences legislation and policies beneficial to the common good of academic health sciences centers and their libraries, including opportunities related to open access and new models of scholarly communication.

### **Association of College & Research Libraries**

[www.ala.org/acrl](http://www.ala.org/acrl)

The Association of College and Research Libraries (ACRL), a division of the American Library Association, represents more than 12,000 academic and research librarians and interested individuals. ACRL is the only individual membership organization in North America that develops programs, products and services to meet the unique needs of academic and research librarians. Its initiatives enable the higher education community to understand the role that academic and research libraries play in the teaching, learning and research environments.

### **Association of Research Libraries**

[www.arl.org](http://www.arl.org)

The Association of Research Libraries (ARL) is an association of over 120 of the largest research libraries in North America. The member institutions serve over 160,000 faculty researchers and scholars and more than 4 million students in the U.S. and Canada. ARL's mission is to influence the changing environment of scholarly communication and the public policies that affect research libraries and the communities they serve. ARL pursues this mission by advancing the goals of its member research libraries, providing leadership in public and information policy to the scholarly and higher education communities, fostering the exchange of ideas and expertise, and shaping a future environment that leverages its interests with those of allied organizations.

### **Greater Western Library Alliance**

[www.gwla.org](http://www.gwla.org)

The Greater Western Library Alliance (GWLA) is a consortium of 31 research libraries in 16 states in the greater Midwest and Western U.S. GWLA members share common interests in scholarly communication, resource sharing and staff development projects. GWLA was a founding member of BioOne, an electronic scholarly publishing initiative launched in 2001.

### **Medical Library Association**

[www.mlanet.org](http://www.mlanet.org)

The Medical Library Association (MLA) is a nonprofit, educational organization of more than 900 institutions and 3,600 individual members in the health sciences information field, with members located in 56 countries. MLA is committed to educating health information professionals, supporting health information research, promoting access to the world's health sciences information, and working to ensure that the best health information is available to all.

### **SPARC (Scholarly Publishing & Academic Resources Coalition)**

[www.arl.org/sparc](http://www.arl.org/sparc)

SPARC, the Scholarly Publishing and Academic Resource Coalition, is an international alliance of academic and research libraries and organizations working to correct imbalances in the scholarly publishing system. Developed by ARL, SPARC has over 200 member institutions and affiliates in North America and closely collaborates with SPARC Europe, which represents more than 70 additional institutions in Europe. SPARC's strategies and activities support open access and capitalize on the networked environment to disseminate research more broadly.