



THE SCHOLARLY PUBLISHING
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July 28, 2004

The Honorable Elias Zerhouni
Director
National Institutes of Health
9000 Rockville Pike
Bethesda, MD 20892

Dear Dr. Zerhouni:

SPARC (the Scholarly Publishing and Academic Resources Coalition) enthusiastically supports the recommendation of the U.S. House of Appropriation Committee that NIH provide free public access to research articles resulting from NIH-funded research. The plan outlined by the Committee will enhance the return on our nation's investment in NIH research and deserves to be implemented in the form put forth by the Committee.

As the NIH's May 2004 report to Congress on "Access to Biomedical Research Information" concludes, widespread dissemination of research knowledge is an essential component of our nation's investment in research. Timely access to taxpayer-funded research results by physicians, public health professionals, patients and patient groups, students, teachers, and scientists will capitalize on the public investment in its research enterprise and will lay groundwork for the accelerated translation of bench science into clinical practice.

Members of the House Committee on Appropriations have correctly surmised that there is insufficient public access to reports and data resulting from NIH-funded research and that the problem has been exacerbated by the dramatic rise in scientific journal subscription prices. This proposal is a smart and timely solution to the problem.

We are aware that a number of publishers have expressed concern that the proposed measure mandates an open-access business model for their journals. They appear to misunderstand the proposal, which proposes open archiving, not open-access publication. Open archiving is not a threat to journals.

The well-known arXiv.org e-print repository serving physics, mathematics, non-linear science, computer science, and quantitative biology has demonstrated this fact. In operation for more than a decade, arXiv.org has not resulted in harm to the corresponding journal publishing industry. Moreover, many commercial and nonprofit publishers today allow authors to immediately archive their accepted articles under terms and conditions substantially similar to those proposed for NIH.

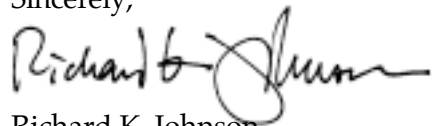
Some publishers have opined that the proposal poses a threat to the revenue they receive from their subscription-supported journals. However, we believe the approach embodied in the House language provides adequate protection to publishers' institutional subscriptions, which generally are the primary means of recovering publishing costs. For example:

- The material to be deposited in PubMed Central is not the final, formatted, paginated, copyedited, authoritative version of the article preferred by authors for citation purposes. While the quality of papers included in PMC has been certified and is suitable for use by individual taxpayers, we are convinced that scientists and researchers in an institutional setting will insist on access to the most authoritative version published in journals.
- For most of the approximately 4000 journals identified in the MEDLINE database, only a subset of their content would be affected. The proportion of open-access articles in a typical journal likely would be insufficient for libraries or individuals to cancel their subscriptions.
- Many journals contain proprietary content that readers value and that would not be in PubMed Central. This includes editorial commentary and opinion, news and event information, review articles, and book reviews, for example. The need for access to this will protect journal subscriptions.
- Embargoed open access is a means of protecting current subscriptions that is employed by a number of commercial and society publishers in biomedical and other fields. Three-to-twelve month embargoes on access to their journal content are increasingly common and recognize that, since use of the content is highest in the months following publication, neither institutional nor individual subscribers will cancel as a result.

This is not to say that the journal publishing industry will be unaffected by the growing demand for open access to research. User expectations are rising and funding agencies around the world are increasingly recognizing the opportunity open access presents to enhance their return on investment. Over the long run, we expect that the journal publishing industry will inevitably undergo changes -- just as have other industries impacted by the Internet. But the economic and social benefits far outweigh any disruption resulting from Internet-driven change.

The proposal at hand is a well-reasoned, cost-effective step that balances the interests of taxpayers and publishers and calls for no further public appropriation of funds. We endorse the proposal and commend the continuing leadership of the NIH and the National Library of Medicine in advancing access to and application of taxpayer-funded research.

Sincerely,



Richard K. Johnson
Director