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via e-mail

Lisa Nichols
Assistant Director for Academic Engagement
Office of Science and Technology Policy
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Re: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research

Dear Ms. Nichols,

Authors Alliance welcomes the opportunity to respond to this request for information on Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research.¹ Authors Alliance is a nonprofit organization with the mission to advance the interests of authors who want to serve the public good by sharing their creations broadly.² We create resources to help authors understand and enjoy their rights and promote policies that make knowledge and culture available and discoverable.

We strongly support removing price and permission barriers to access the results of federally funded research because doing so:

- Is consistent with most scientific authors' wishes;
- Supports learning, teaching, research, and practice; and
- Creates a more hospitable environment for scientific advancement.

For these reasons, the Office should pursue policies that would make the results of all federally funded research immediately available for the public to freely access and use.

¹ Request for Information: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research, 85 Fed. Reg. 9488 (Feb. 19, 2020).

² For more information about Authors Alliance, see Authors Alliance, *About Us*, <https://www.authorsalliance.org/about/>.

I. Making federally funded research freely and immediately available under a public license is consistent with most scientific authors' wishes.

Many Authors Alliance members are scientific authors who rely on federal dollars to fund their research. They are incentivized by the desire to advance scientific understanding, a goal that is supported when their research results are readily available for potential readers to find, access, and use. Immediate and free online availability, together with reuse permissions, increases their works' visibility, helping them to reach a much larger audience and advance scientific understanding.

However, without a federal policy, many authors do not have the bargaining power necessary to demand from publishers the level of access they want for their research. To address this disconnect while maximizing access and usability, federal policy should require:

- That the results of all federally funded research be made immediately available, with a zero-embargo policy. The current twelve-month embargo period allows for an unnecessary delay that hinders the progress of knowledge.
- That scholarly publications resulting from federally funded research be made publicly available under a Creative Commons Attribution (CC-BY) license.³ Licensing scholarly publications under a CC-BY license removes permission barriers that could otherwise prevent other researchers and the general public from fully accessing, sharing, and reusing scholarly publications.
- That data resulting from federally funded research be made available and dedicated to the public domain using a CC0 license.⁴ When data are readily available in the public domain, other researchers and the general public are able to validate, replicate, and build on previous research.

II. Removing price and permission barriers supports learning, teaching, research, and practice.

Authors understand that the value of federally funded research is maximized when other researchers, practitioners, students, teachers, and the general public are able to freely access and use the scholarly publications, data, and code resulting from the research. Unfortunately, because scientific authors are typically asked to assign or exclusively license their copyright to publishers that publish research results in prohibitively expensive subscription-based journals, many would-be readers are unable to access those results.

³ For more information about Creative Commons licenses, see Creative Commons, *About the Licenses*, <https://creativecommons.org/licenses/>.

⁴ For more information, see Creative Commons, *CC0*, <https://creativecommons.org/share-your-work/public-domain/cc0/>.

While access issues may be especially acute in low- and middle- income countries, even individuals at U.S.-based institutions may find that their libraries do not have the resources to subscribe to relevant journals in their fields.⁵ Many university libraries spend over half of their journal budgets on subscriptions to Elsevier, Springer, and Wiley alone, while other libraries cannot afford these subscriptions at all.⁶

Outside of academic settings, medical patients and their doctors and family members have especially compelling needs for immediate access to the results of federally funded research. When federally funded research is trapped behind paywalls, even for twelve months, many who could otherwise use the results to advance learning, teaching, research, and practice are excluded from putting the research to these productive uses.

III. Removing price and permission barriers maximizes the government's investment in scientific research by creating a more hospitable environment for future scientific advancements.

Placing the results of the government's investment behind a paywall—even temporarily—significantly undermines the purpose of federal research grants and hinders the pace of scientific discovery and innovation by limiting who is able to access and build upon research results. Because the U.S. government spends over \$60 billion annually to make this research possible, it should maximize that investment by ensuring that the public may freely and immediately access and use it.

Making the outputs of federally funded research immediately available would accelerate the pace of scientific discovery. For example, the recent free and immediate exchange of COVID-19 research has played a key role in understanding the novel virus.⁷ Scientific authors and scientific progress have benefited from the unprecedented level of data sharing as they work in tandem to compile stronger and more accurate data sets, debunk misinformation, and perhaps even forge a quicker path to a vaccine.⁸

Removing access barriers in *every* scientific field would likely provide similar public benefits. If research for other serious health conditions—such as cancer, heart disease, or Alzheimer's—were treated with the same urgency, researchers would more readily be able to collaborate, test, and build upon each other's research, accelerating the pace toward

⁵ See, e.g., Ian Sample, *Harvard University says it can't afford journal publishers' prices* (April 24, 2012), <https://www.theguardian.com/science/2012/apr/24/harvard-university-journal-publishers-prices>.

⁶ See Heather Joseph on Behalf of SPARC Coalition, *SPARC White House Letter* (December 20, 2019), <https://sparcopen.org/wp-content/uploads/2020/01/SPARC-White-House-Letter-1.pdf>.

⁷ Klint Finley, *Data Sharing and Open Source Software Help Combat Covid-19* (March 13, 2020), <https://www.wired.com/story/data-sharing-open-source-software-combat-covid-19>.

⁸ Michael Hiltzik, *COVID-19 could kill the for-profit science publishing model. That would be a good thing* (March 3, 2020), <https://www.latimes.com/business/story/2020-03-03/covid-19-open-science>.

cures. Our members have long recognized the value that immediate, barrier-free access presents to all kinds of researchers because it enables them to incorporate new findings into their own studies more rapidly. According to Authors Alliance member and advisor Michael Eisen, “this should be the default for all science, not just COVID-19 science, and it should have been the default for the past 25 years.”⁹

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In sum, many Authors Alliance members rely on federal dollars to fund their research and want the results to be freely and immediately available to the public. Potential readers may then readily find and access those results without being turned away by prohibitively expensive subscription-based paywalls. Immediate and free online availability increases their works’ visibility, helps their works reach a much larger audience, accelerates the pace of scientific innovation, and expedites life-saving discoveries based on their works. Accordingly, we strongly support removing price and permission barriers to access for federally funded research.

Respectfully submitted,



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⁹ Klint Finley, *Global Officials Call for Free Access to COVID-19 Research* (March 13, 2020), <https://www.wired.com/story/global-officials-call-free-access-covid-19-research>.