

December 18, 2019

Dr. Kelvin Droegemeier  
Office of Science and Technology Policy  
Executive Office of the President  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue  
Washington, DC 20504

Dear Dr. Droegemeier:

STM publishers support all models and approaches that have the potential to lead to a more open scholarly communication environment and a greater empowerment of researchers. We continue to work diligently with stakeholders across the research ecosystem to build towards a future where quality, rigor, replicability, reproducibility, and integrity of research can be sustained while meeting the access needs of researchers and the public in an open and collaborative manner. We were therefore alarmed to learn that the Administration may be considering a precipitous move to require immediate access to any article that reports on Federally funded research, without due consideration of the impact of such a policy on research and discovery and the costs to the taxpayer of a shift to open access.

Such a step runs counter to Administration goals across the government. It could undermine JCORE's efforts to improve rigor and replicability of research, reduce Administrative burdens, and partner with the private sector in the advancement of research. It could undermine agency goals to support the best research and catalyze discovery. It is also at odds with Administration goals of fostering innovation in the private sector, promoting exports, and protecting intellectual property. We write to express our strong opposition to any such proposal.

Our member organizations already support broad access to the scientific literature and are innovating for open science. Existing policies that require free access to articles no later than 12 months after publication were a carefully considered, collaboratively developed compromise intervention in the market, and any further changes must also be carefully considered. Uniform and unilateral reductions in the embargo that fail to identify sufficient funding for open access publishing would threaten investments in the research communication system and put at risk icons of American scientific leadership, including those published by several of our members. It would place increased financial responsibility on taxpayers, rather than allowing a global research community to contribute to the communication of scholarship.

Under a regulatory framework that mandates immediate access to articles, many scientific societies and other scholarly publishers would be unable to continue their work to advance science, health, and innovation. This work includes managing the peer review process, revision, and copyediting; preparing manuscripts; creating extensive links to related research outputs; providing electronic and print distribution; and ensuring discovery and deposit into long-term archives. It includes support for research communities and the American scientists who are key to future generations of discovery and innovation.

STM and its members continue to stand ready to work with funders to make a vision of a high-quality, sustainable, and more open scholarly communication environment a reality, but we cannot do so if our ability to invest is undermined. We hope that policies will not advance until we are able to discuss the impact of any specific proposal on our ability to continue supporting the quality and integrity of research outputs. We have appreciated your openness to discussion of these issues in the past and would welcome the opportunity for continued dialogue in support of a balanced approach to these issues that truly enhances and advances research.

Sincerely,



Ian Moss  
CEO

Cc:

Co-Chairs of the Open Science Subcommittee of the National Science and Technology Council  
Committee on Science:

Dan Brouillette, Secretary of Energy, Department of Energy

Francis Collins, Director, National Institutes of Health

France Córdova, Director, National Science Foundation

Mark Esper, Secretary of Defense, Department of Defense

Neil Jacobs, Assistant Secretary of Commerce for Environmental Observation and Prediction,  
performing the duties of Under Secretary of Commerce for Oceans and Atmosphere,  
Department of Commerce

Joe Grogan, Assistant to the President for Domestic Policy

Russell Vought, Director (Acting), Office of Management and Budget