

April 3, 2014

Honorable Chairman Lamar Smith
Chairman
Committee on Science, Space and Technology
Technology
U.S. House of Representatives
Washington, DC 20515

Eddie Bernice Johnson
Ranking Member
Committee on Science, Space and
U.S. House of Representatives
Washington, DC 20515

RE: Public Access to Research Articles in Section 303 of the FIRST Act

The Honorable Lamar Smith and Eddie Bernice Johnson:

The IEEE, a worldwide association of more than 425,000 technology professionals, welcomes the opportunity to state its support for Sec. 303 of H.R. 4186, the Frontiers in Innovation, Research, Science, and Technology (FIRST) Act.

The IEEE is a strong supporter of sustainable efforts to expand access to scholarly publications in general, and in particular to expand free public access to articles resulting from government-funded research. To be sustainable these efforts must protect and advance other important societal interests inherent in scholarly publishing, including peer review, protecting the integrity of the research archive, and preserving the intellectual property rights of authors and publishers.

The IEEE wishes to reiterate its position that US policy to promote public access to scholarly research should recognize the following principles:

- Any approach should preserve academic freedom and be business-model neutral. That means the policy should allow authors to choose the most appropriate venue to publish their work, whether that journal be funded through traditional reader subscriptions, article processing charges (APCs), funder sponsorship, or some combination of these.
- Scholarly journals must be permitted to retain financial support of their important peer-review, editorial, and archival functions. To accomplish this, any embargo period must be long enough to sustain subscriptions and other funding streams which may vary by discipline. In the case of engineering and technology subjects, the IEEE recommends that the embargo period be 24 months. An embargo period of fewer than 24 months will damage the IEEE's ability to fulfill our mission to authors and scholars worldwide. The behavior of users of the IEEE Xplore Digital Library shows that 85% of the articles retrieved are older than 12 months. Given this long shelf life of technology information, an embargo of less than 24 months would provide an incentive to many users to forego immediate access and cancel subscriptions or avoid paying APCs.



- Public access should be achieved through public-private partnerships that leverage the infrastructure and experience of publishers and minimize the expense to taxpayers. Toward this end, the IEEE is a supporter of the FundRef project that helps federal agencies identify journal articles related to the research they fund – all at no cost to the government. The IEEE is also a strong supporter of the ClearingHouse for Open Research of the United States (CHORUS) initiative to facilitate public access to scholarly research articles without new federal investment in duplicative repositories.

Since the White House Office of Science and Technology Policy (OSTP) first sought comment on development of public access policies, the IEEE has supported collaboration between federal agencies and stakeholders in the research communities to advance public access. We believe that Sec. 303 provides the flexible framework needed to meet the OSTP's requirements of its Feb. 21, 2013 memo on expanding public access to publications and data. Further, we appreciate that the framework provides an avenue for sustainable public access without straining the limited resources of the federal budget, and we urge you to reject any amendments that would undermine the approach of Sec. 303 in its current form.

Sincerely,



Roberto de Marca
IEEE President and CEO

