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Dr. John Holdren
Director
Office of Science and Technology Policy
Executive Office of the President
New Executive Office Building
725 17th Street, NW
Washington, DC 20502

Dear Dr. Holdren:

We write on behalf of the members of the Professional and Scholarly Publishing Division of the Association of American Publishers ("AAP/PSP") and the DC Principles Coalition for Free Access to Science. Collectively, we represent tens of thousands of publishing employees and professional members across the country, and publish millions of peer-reviewed scholarly and scientific journal articles in a multitude of disciplines. We appreciate the important challenges and opportunities presented by the bipartisan America COMPETES Reauthorization Act of 2010 (P.L.111-358) and look forward to working closely with OSTP in support of its implementation to harness government investments in research and ensure that it delivers on its mission to maintain U.S. global leadership in science, technology, innovation and economic growth.

Section 103 of the America COMPETES reauthorization specifically defines coordination of agency policies concerning stewardship and dissemination of research results supported by federal science agency funding as one area in which we can immediately begin collaborative discussions. The legislation calls on OSTP to establish a working group under the National Science and Technology Council (NSTC) that would focus on the following ten responsibilities:

- (1) *identify the specific objectives and public interests that need to be addressed by any policies coordinated under the working group);*
- (2) *take into account inherent variability among Federal science agencies and scientific disciplines in the nature of research, types of data, and dissemination models;*
- (3) *coordinate the development or designation of standards for research data, the structure of full text and metadata, navigation tools, and other applications to maximize interoperability across Federal science agencies, across science and engineering disciplines, and between research data and scholarly publications, taking into account existing consensus standards, including international standards;*
- (4) *coordinate Federal science agency programs and activities that support research and education on tools and systems required to ensure preservation and stewardship of all forms of digital research data, including scholarly publications;*
- (5) *work with international science and technology counterparts to maximize interoperability between United States based unclassified research databases and international databases and repositories;*
- (6) *solicit input and recommendations from, and collaborate with, non-Federal stakeholders, including the public, universities, nonprofit and for profit publishers, libraries, federally funded and non federally funded research scientists, and other organizations and institutions with a stake in long term preservation and access to the results of federally funded research;*

- (7) *establish priorities for coordinating the development of any Federal science agency policies related to public access to the results of federally funded research to maximize the benefits of such policies with respect to their potential economic or other impact on the science and engineering enterprise and the stakeholders thereof;*
- (8) *take into consideration the distinction between scholarly publications and digital data;*
- (9) *take into consideration the role that scientific publishers play in the peer review process in ensuring the integrity of the record of scientific research, including the investments and added value that they make; and*
- (10) *examine Federal agency practices and procedures for providing research reports to the agencies charged with locating and preserving unclassified research.*

These legislative requirements highlight the need for OSTP to develop a mechanism to facilitate regular consultation with the publishing industry and other stakeholders at the outset of the process. Close collaboration with the many “non-federal stakeholders” will support the development of innovative and sustainable approaches under Section 103 as the Administration confronts multiple, overlapping challenges in a very difficult fiscal environment.

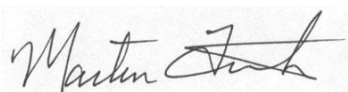
In the face of continuing budgetary uncertainties and the inherent differences among Federal science agencies and scientific disciplines, the government can build on the longstanding partnership with non-profit and commercial publishers. For over 100 years, journal publishers have served as integral hubs of the scientific research enterprise, facilitating scholarly communication and the dissemination and preservation of scientific information, managing the scientific record and coordinating the peer review process. In 2011, our members’ continuing investments in digital platforms with the latest Web 2.0 capabilities have helped to deepen their contributions to the scientific, technological, engineering and medical communities — expanding accessibility, improving interoperability and fueling innovation. We now have iPhone and iPad apps and are experimenting with iTunes-style delivery platforms. We are confident that a partnership between agencies and publishers will deliver more cost-effective solutions to the public and science with cutting-edge tools.

Consultation with publisher stakeholders will also help achieve President Obama’s urgent objectives of spurring job creation, economic growth and innovation. In line with the January 18 Executive Order to ensure that agency policies are implemented in ways that promote economic growth, innovation, competitiveness, and job creation, publishers will be able to provide critical input on sustainable approaches to implementing Section 103 in a way that aligns with the Administration’s new “fundamental operating principles” outlined by President Obama— “seeking more affordable, less intrusive means to achieve the same ends—giving careful consideration to benefits and costs.” Over 1000 U.S.-based science journal publishers (including both commercial publishers and society publishers) employ over 30,000 staff and indirectly support an additional 20,000 workers. North American-based science and scholarly journal publishers account for 45% of all peer-reviewed research papers published annually for researchers worldwide. For some publishers, over 50% of revenue is derived from exports to international markets. The updated “Strategy for American Innovation” recently released by President Obama similarly highlights the importance of market-based innovation policies, including the protection of intellectual property and export of innovative products, as a driver of economic growth that “will bring greater income, higher quality jobs, and improved health and quality of life to all U.S. citizens.”

We request a meeting at your earliest convenience for representatives from PSP and the DC Principles Coalition with you or your delegates to discuss the consultation mechanism and the objectives to be addressed under Section 103 before the process gets underway. We look forward to working closely with OSTP and research-funding agencies to support the implementation of the legislation and ensure that it delivers on its mission to maintain U.S. global leadership in science, technology, and innovation. We are committed to working with you to build an innovation economy for the 21st century.



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