AMERICAN ASSOCIATION OF PETROLEUM GEOLOGISTS

An International Geological Organization

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1. The following comments are submitted by the American Association of Petroleum Geologists, a not-for- profit scientific society, with over 36,000 members worldwide, whose mission is to advance the science of petroleum geology. Publishing is one means of fulfilling that mission. Our publications are based on research stemming from a combination of industry, private and in some cases government supported research – such as NSF, USGS, or DOE. As a publisher AAPG adds value to the research via the peer review, production, printing and distribution of the final paper. We pay the full cost of this effort, and depend in small part on membership dues, and contributions, but most importantly on sales revenue of the publications to try and recoup the cost of publishing, which does not always happen.

2. While the concept of ready access to government funded research should be encouraged and embraced, the publishing and internet community are partnering to develop technology solutions which have lowered the barriers to access and as a result, accomplished this goal. For example, our journal the AAPG Bulletin is available to researchers worldwide digitally, via a number of online subscription mechanisms, to researchers and students who need it in nearly 800 government, academia and industry institutions worldwide. Our papers are also searchable and attainable to the general public on 2 online Pay-Per-View sites for downloads as low as $10. This is in addition to online access by our 36,000 members who are students, researchers and practitioners.

3. In developing policies on open access there are several issues that need to be considered, from the point of view of a small publisher, in order to avoid creation of unintended negative impacts to the publishers and ultimately the publishing process. It is hoped that new policies on open access of publications consider and provide solutions to these factors. Comments to specific questions posed by OSTP are outlined below, with original questions in **bold**.

(1) Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research? How can policies for archiving publications and making them publically accessible be used to grow the economy and improve the productivity of the scientific enterprise? What are the relative costs and benefits of such policies?

4. A policy requiring "free to the public" could negatively impact, and in a worst case scenario, destroy the financial viability of some non-profit publishers, without an offsetting revenue source. To implement a "free to the Public " or open access model for non-profit publishers, and not damage their economic viability, would require a mechanism for research funds to be allocated in advance, as part of the original research grant, to cover ultimate publication costs by 3rd party non-profit publishers. This would hopefully offset part of the revenue loss to the publisher for moving toward open access.

(2) What specific steps can be taken to protect the intellectual property interests of publishers, scientists, Federal agencies, and other stakeholders involved with the publication and dissemination of peer-reviewed scholarly publications resulting from federally funded scientific research? Conversely, are there policies that should not be adopted with respect to public access to peer-reviewed scholarly publications so as not to undermine any intellectual property rights of publishers, scientists, Federal agencies, and other stakeholders?

5. While even if copyrights are in place, open access effectively degrades the enforceable economic value to the Intellectual Property on the part of the publisher.

(3) What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities?

6. Centralized control of publications is incompatible with the business model of our Association and likely most publishers. The ability to structure a user friendly and logical site that meets the needs of all Scientific Disciplines (Astronomy, Geology, Medical, etc.) is difficult if not impractical, and unnecessary given the innovative technology within the marketplace to index and search across platforms for scientific data.

(7) Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

7. A consistent policy would be recommended, recognizing the financial viability of Book publishing may be different from that of Journals. For books in particular a suitable embargo period would need to be in place, so that publishers could attempt to recover portions of their publishing investment.

(8) What is the appropriate embargo period after publication before the public is granted free access to the full content of peer-reviewed scholarly publications resulting from federally funded research?

8. An embargo period of at 2-5+ years would be needed in order to not jeopardize the economic viability of non-profit publishers; even then it might be a burden depending upon whether other compensatory measures are installed.

Please describe the empirical basis for the recommended embargo period.

9. For our Association, Journal and book publishing is already a financially challenging proposition. Scientific books, such as what AAPG publishes, are of small press run and can take 2-5 years or more to recover the investment. Some books never do recover the investment. Geoscience publications generally also have a long shelf life, as compared to medical research for example. One measure of this would be the Cited Half-Life. According the ISI Web of Knowledge, published by Thomson Reuters, the category of "Geosciences, Multidisciplinary" journals have a cited half-life of 8.1 years (as of 2010). The AAPG Bulletin has a cited half-life of >10 years.

Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

Please identify any other items the Task Force might consider for Federal policies related to public access to peer reviewed scholarly publications resulting from federally supported research.

10. New policies should include clear definitions of what constitutes government research in the context of a publications requirement for open access. This is in regard to the relative percent of government funding that went into the research that was ultimately published. It may not be 100%. For example some papers may result entirely from an NSF funded MS Thesis. Other papers may have been derived in small part from the original research and also incorporate private or industry funding. Would this still be a required open access publication?

Sincerely,

Dr. Paul Weimer
AAPG President