

AMERICAN ASSOCIATION OF PETROLEUM GEOLOGISTS

An International Geological Organization



Dr. John C. Lorenz
President

January 19, 2010

Dr. Diane DiEuliis
Office of Science and Technology Policy
725 17th Street, NW
Washington, DC 20502
Via email to: publicaccess@ostp.gov
Re: Public access policy

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Dear Dr. DiEuliis,

Thank you for this opportunity to provide input to the Office of Science and Technology Policy (OSTP) on improving open access to the results of federally-funded research.

I am writing to you on behalf of the American Association of Petroleum Geologists (AAPG), a not-for-profit scientific and professional association with more than 35,000 members in 116 countries. As the world's largest geological association, AAPG's purpose is to foster scientific research and to advance the science of geology, particularly as it relates to petroleum, natural gas, other subsurface fluids, mineral resources, and the environment.

To accomplish this mission, the association publishes a monthly peer-reviewed journal, the *Bulletin*, special geological books, and other materials. Its Division of Environmental Geology also publishes a peer-reviewed journal, *Environmental Geology*.

AAPG seeks to provide geologic information to the public and finds merit in the cross-disciplinary research the federal government seeks to stimulate by broadening public access to the results of federal research. However, we believe that reaching these goals must be done in a manner that does not erode the scientific quality of published research, or destroy the business model that sustains this process in a not-for-profit organization such as ours. It should also recognize the differences between scientific disciplines and their scientific communities, and that the model that works for one may not work for another.

Numerous and significant challenges remain to be overcome. These include:

1. The need to evolve a sustainable business model in non-profit science publishing if the proposed open access rules are adopted. NIH has pioneered a model for its community. We have not yet had time to determine whether this model is applicable to our scientific disciplines, nor whether this model is the best one

available. Developing new business models and evaluating their outcomes should be part of the process, and encouraged by the federal government.

2. Determining the proper embargo length before public release of a published paper, based on the scientific discipline.
3. Proper handling of proprietary data used in the course of federal research, a frequent occurrence in geological research. How would disclosure requirements affect these data sources? Could there be a chilling effect on the public-private partnerships necessary to conduct collaborative federal research?
4. Where does the burden of compliance rest? Federal research funds typically are granted to individual researchers or universities, however a first review of the open access proposal seems to shift a level of compliance onto not-for-profit publishers who were not party to the original funded research.

These issues, and many others, touch every member of the research enterprise from researcher and scientist, academic and research institution, to funding agency and science publisher. The effects of changes to current practice are unknown. However, our first concerns are whether providing open access to certain AAPG publications might negatively affect membership in AAPG or whether the burdens of the proposed open access requirement might cause AAPG to stop publishing research that requires open access.

Let us move forward cautiously to obtain input from the broader publishing community so that we realize the promised benefits of broadened access to federal research results without unwittingly undermining the process that produces those results.

AAPG wishes to engage constructively in this dialog and hopes that the discussion period will be extended to promote a more thorough discussion.

Sincerely,

John C. Lorenz
President