

August 23, 2005

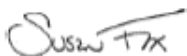
Dr. Astrid Wissenburg  
Economic & Social Research Council  
Polaris House  
North Star Avenue  
Swindon SN2 1UJ  
United Kingdom

Dear Dr. Wissenburg:

The following comments are submitted in response to the Research Councils' UK June 28, 2005 draft position statement on their emerging views on the issue of improved access to research outputs.

We would welcome an opportunity to provide the RCUK with additional comments as needed. If possible, we would like to obtain your permission to post this document on our organizations' web sites. Please contact Heather Joseph at +202 296 2296 or [heather@arl.org](mailto:heather@arl.org).

Sincerely,



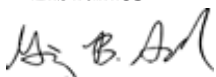
Susan Fox  
Executive Director  
American Association of Law  
Libraries



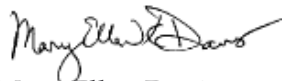
Keith Fiels  
Executive Director  
American Library Association



J. Michael Homan  
President  
Association of Academic Health Sciences  
Libraries



Gigi B. Sohn  
President  
Public Knowledge



Mary Ellen Davis  
Executive Director  
Association of College and Research  
Libraries



Duane E. Webster  
Executive Director  
Association of Research Libraries



Carla J. Funk  
Executive Director  
Medical Library Association



Heather D. Joseph  
Executive Director  
SPARC

**Research Councils United Kingdom**  
Position Statement on Research Outputs  
(RCUK consultation documentation available online at: <http://www.rcuk.ac.uk/access/cover.asp>)

Comments submitted by:  
**American Association of Law Libraries**  
**American Library Association**  
**Association of Academic Health Sciences Libraries**  
**Association of College & Research Libraries**  
**Association of Research Libraries**  
**Medical Library Association**  
**Public Knowledge**  
**SPARC**

This memorandum presents the views of several leading U.S. organizations concerned with the wide, affordable, and effective dissemination of scientific and scholarly research results: the American Association of Law Libraries, the American Library Association, the Association of Academic Health Sciences Libraries, the Association of College and Research Libraries, the Association of Research Libraries, the Medical Library Association, and SPARC (the Scholarly Publishing and Academic Resources Coalition).

We commend the Research Councils' decision to establish a policy designed to improve access to the results of publicly funded research, and in particular, applaud the four principles upon which this policy based. We appreciate the RCUK's decision to actively seek comments from a wide range of stakeholders. Although our organizations are not located in the United Kingdom, we offer our views because the scholarly publishing process and journals markets are highly international – involving authors, subscribers, readers, and research funding from many nations. Additionally, there is substantial cooperation among stakeholders on both sides of the Atlantic in seeking solutions. The views expressed herein are closely aligned with those of SPARC Europe ([www.sparceurope.org](http://www.sparceurope.org)), a coalition of European libraries based at Oxford University in the U.K., which advocates changes in the scholarly publishing market to better serve the international research community.

Our organizations are deeply concerned that the high and rapidly-rising cost to libraries of journal subscriptions, in the U.K. as well as worldwide, is a significant threat to scientific and scholarly communication. Price increases – far outpacing the growth of not only library budgets, but also inflation – have created a dysfunctional and unsustainable system of scientific communication in which libraries cannot afford access

to the broad range of publications needed by researchers. As access to journals declines, productivity is reduced – efforts may be duplicated, unproductive lines of research may continue, and innovation is slowed.

We believe that open-access research dissemination is an indispensable part of the overall remedy to the serious problems now facing the system of scholarly communication. Moreover, open access is a necessary ingredient in any plan to fully realize the social benefits of scientific advances. While these advantages are important no matter the source of the funding, it is particularly critical when the research is publicly funded and the resulting output is a public good.

To that end, we commend the RCUK for recommending a policy that requires all Research Council grant recipients to deposit published journal articles or conference proceedings arising from publicly-funded research in an appropriate e-print repository at the time of publication. Implementation of such a policy will result in taxpayers gaining immediate, full and direct access to the research for which they have already paid. Moreover, such a policy will increase the return on the government's investment in this research; as a result of deposit the research becomes more accessible, discoverable, sharable, and for these reasons, more useful, than toll-access research.

We would also like to note that the Research Council's Policy is not without precedent. It closely resembles the Public Access Policy of the U.S. National Institutes of Health, which went in to effect on May 2, 2005. ([www.nih.gov/about/publicaccess/index.htm](http://www.nih.gov/about/publicaccess/index.htm)) These two policies share similar goals – chief among these creating a publicly available archive of publicly funded research to advance the conduct of science. We are particularly pleased to note that the Research Council's policy **requires** grantees to deposit final published articles, greatly enhancing the policy's chances for successfully achieving these important goals and ensuring maximum participation.

To further ensure the success of this policy, we would suggest that the Research Councils consider revising the section of the policy that specifically relates to the timing of the deposit of research materials. Because authors typically transfer copyright to publishers, the copyright-holder at the time of deposit will usually be the publisher. Paragraph 14.b of the draft policy states: "Deposit should take place at the earliest opportunity, wherever possible at or around the time of publication, in accordance with copyright and licensing arrangements." This language seems to allow publishers, in cases where they have become the copyright-holder, to object to deposit or to demand long delays or embargoes prior to deposit or public release. We encourage the Research Councils to close this loophole before the final draft is finished to ensure that deposit does indeed occur at the desired point, at or around the time of publication.

We note that the draft policy exempts researchers from the requirement to deposit their research in instances where they do not have access to an institutional or disciplinary repository. We hope that the Research Councils will implement strategies to

encourage the development of repositories in the U.K. in a manner that makes deposit available to all researchers.

Representatives of our organizations would welcome an opportunity to provide additional comments to the Research Councils, if this would be useful.

## Who We Are

### **American Association of Law Libraries**

[www.aallnet.org](http://www.aallnet.org)

With over 5,000 members, the American Association of Law Libraries (AALL) represents law librarians and related professionals who are affiliated with and serve the nearly one million men and women working in the range of U.S. legal institutions: law firms; law schools; corporate legal departments; courts; and local, state and federal government agencies. The association was founded in 1906 to promote and enhance the value of law libraries to the legal and public communities, to foster the profession of law librarianship, and to provide leadership in the field of legal information.

### **American Library Association**

[www.ala.org](http://www.ala.org)

The American Library Association (ALA) is the oldest and largest library association in the world, with more than 65,000 members. Its mission is to provide leadership for the development, promotion and improvement of library and information services and the profession of librarianship in order to enhance learning and ensure access to information for all.

### **Association of Academic Health Sciences Libraries**

[www.aahsl.org](http://www.aahsl.org)

The Association of Academic Health Sciences Libraries (AAHSL) is composed of the directors of libraries of 142 accredited U. S. and Canadian medical schools belonging to or affiliated with the Association of American Medical Colleges. AAHSL's goals are to promote excellence in academic health science libraries and to ensure that the next generation of health practitioners is trained in information seeking skills that enhance the quality of health care delivery, education, and research. The Association influences legislation and policies beneficial to the common good of academic health sciences centers and their libraries, including opportunities related to open access and new models of scholarly communication.

### **Association of College & Research Libraries**

[www.ala.org/acrl](http://www.ala.org/acrl)

The Association of College and Research Libraries (ACRL), a division of the American Library Association, represents more than 12,000 academic and research librarians and interested individuals. ACRL is the only individual membership organization in North America that develops programs, products and services to meet the unique needs of academic and research librarians. Its initiatives enable the higher education community to understand the role that academic and research libraries play in the teaching, learning and research environments.

## **Association of Research Libraries**

[www.arl.org](http://www.arl.org)

The Association of Research Libraries (ARL) is an association of over 120 of the largest research libraries in North America. The member institutions serve over 160,000 faculty researchers and scholars and more than 4 million students in the U.S. and Canada. ARL's mission is to influence the changing environment of scholarly communication and the public policies that affect research libraries and the communities they serve. ARL pursues this mission by advancing the goals of its member research libraries, providing leadership in public and information policy to the scholarly and higher education communities, fostering the exchange of ideas and expertise, and shaping a future environment that leverages its interests with those of allied organizations.

## **Medical Library Association**

[www.mlanet.org](http://www.mlanet.org)

The Medical Library Association (MLA) is a nonprofit, educational organization of more than 900 institutions and 3,600 individual members in the health sciences information field, with members located in 56 countries. MLA is committed to educating health information professionals, supporting health information research, promoting access to the world's health sciences information, and working to ensure that the best health information is available to all.

## **SPARC (Scholarly Publishing & Academic Resources Coalition)**

[www.arl.org/sparc](http://www.arl.org/sparc)

SPARC, the Scholarly Publishing and Academic Resource Coalition, is an international alliance of academic and research libraries and organizations working to correct market dysfunctions in the scholarly publishing system. Developed by ARL, SPARC has over 200 member institutions and affiliates in North America and closely collaborates with SPARC Europe, which represents more than 70 additional institutions in Europe. SPARC's strategies and activities support open access and capitalize on the networked environment to disseminate research more broadly.

## **Public Knowledge**

[www.publicknowledge.org](http://www.publicknowledge.org)

Public Knowledge is a public interest advocacy and education organization that seeks to promote a balanced approach to intellectual property law and technology policy that reflects the "cultural bargain" intended by the framers of the U.S. constitution.