



NATIONAL OFFICE: 8120 Woodmont Avenue, Suite 750 Bethesda, MD 20814-2762  
TEL: (301) 347-9300 FAX: (301) 347-9310 E-MAIL: [ascbinfo@ascb.org](mailto:ascbinfo@ascb.org) WEBSITE: [www.ascb.org](http://www.ascb.org)

January 21, 2010

Diane DiEuliis, PhD  
Office of Science and Technology Policy  
ATTN: Open Government Recommendations  
725 17<sup>th</sup> Street  
Washington, DC 20502

Dear Dr. DiEuliis:

The American Society for Cell Biology (ASCB) would like to thank the Office of Science and Technology Policy (OSTP) for bringing attention to the important issue of public access to the results of federally funded research. The ASCB is a nonprofit scientific society of over 9,000 members at leading research institutions, state colleges, undergraduate teaching institutions, and biotechnology companies. The Society's publications include the high-impact monthly research journal *Molecular Biology of the Cell (MBoC)*.

The ASCB believes strongly that barriers to scientific communication slow scientific progress. The more widely scientific results are disseminated, the more readily they can be understood, applied, and built upon. The sooner findings are shared, the faster they will lead to new scientific insights and breakthroughs. This conviction has motivated the ASCB to provide free access to all of the research articles in *MBoC* two months after publication, which it has done since 2001. The articles are available both on the journal's website and in the National Library of Medicine's online archive, PubMed Central.

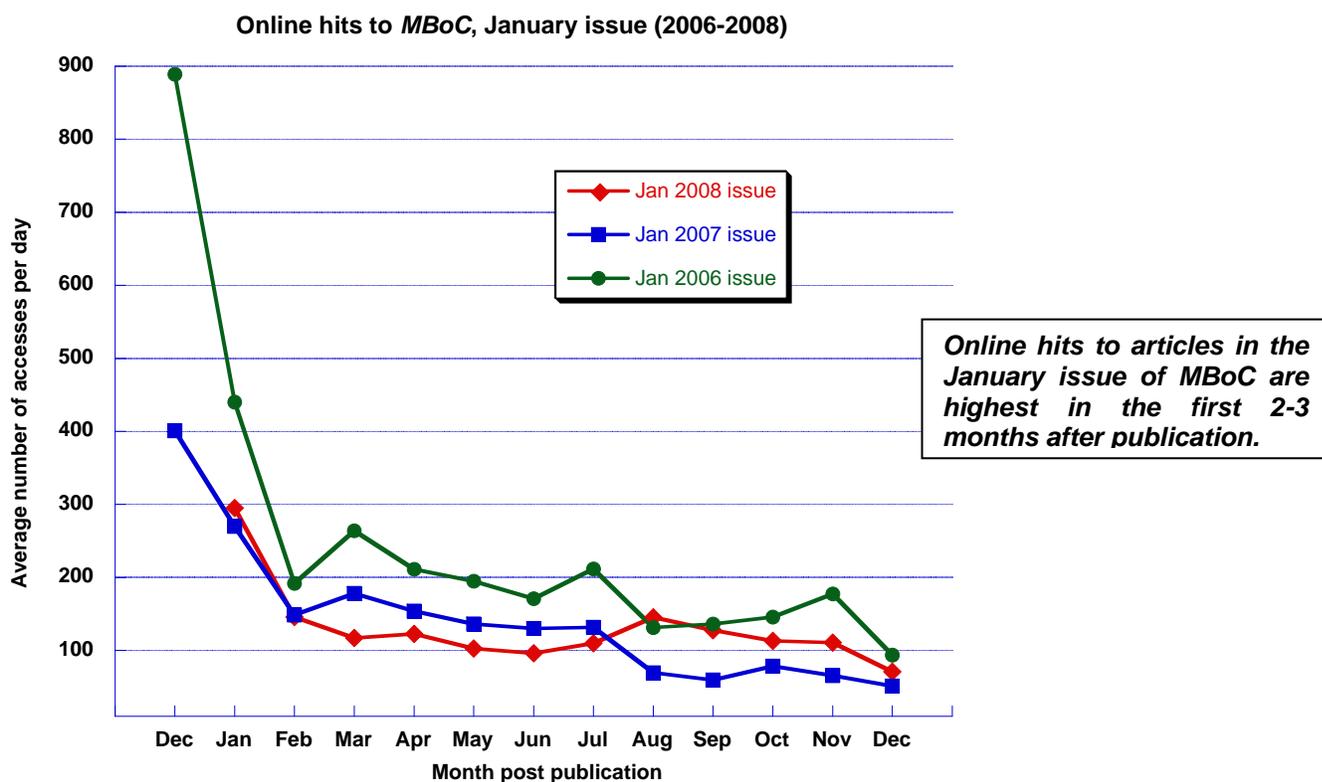
The vast majority of the biomedical research conducted at American universities and colleges is funded by taxpayers. The ASCB believes that taxpayers are best served when all scientists, educators, physicians, and members of the public – including patients and their families – have access to publicly funded research results. So long as significant access barriers remain, taxpayers are not fully benefiting from the work that they fund. With the proliferation of networked technology, we have an unprecedented and cost-effective means to overcome such barriers. For the first time, it is possible and practical to offer free access to every potential user. It is incumbent upon us, as scientists and citizens, to take full advantage of this opportunity.

Some publishers argue that providing free access to their journal's content will catastrophically erode their subscription revenue base. The experience of many successful research journals demonstrates otherwise; these journals make their online content freely available after a short embargo period that protects subscription revenue. For example, as noted above, the content of *MBoC* is free to all after only two months, yet the journal remains not only financially sound, but profitable. This is because academic and institutional libraries serve research scientists, who have

a specific need to access research articles promptly after their publication; these researchers cannot wait months for free access. The time sensitivity of this information is clear from a recent analysis of content usage in *MBoC* (see figure).

Many scientific journals also offer “front matter,” such as news features, announcements, and reviews in the same publication as research papers. Since this value-added content is typically not paid for by federal research dollars, publishers would not be required to deposit it for public access. This material is valuable to the reader, adding further to the incentive for institutions and individuals to maintain their subscriptions to scientific journals.

A comprehensive and searchable manuscript database will profoundly enhance scientists’ research productivity. Currently, scientists must search multiple databases to access data and information. Central interoperable repositories that share common formats and standards will make the data and information more accessible and more readily integrated with related databases. They will also increase the efficiency and sophistication with which the stored articles can be searched for relevant information. These advantages will significantly increase the value of the information to the scientific community.



PubMed Central provides an efficient and cost-effective model for how such repositories might be structured and managed. The ASCB was one of the first publishers to participate in PubMed Central and we remain a Full Participant. We provide PubMed Central with full text articles from *MBoC* in XML and PDF formats, together with image files. The vendor that hosts *MBoC* online uses files in the same formats, so the files can simply be forwarded to PubMed Central after an issue is published. No additional effort is required on the part of authors or ASCB staff, and there is no additional expense apart from the small fee that the online host charges us to forward the files.

Approximately 400,000 unique users access the PubMed Central website every day, retrieving

600,000 - 700,000 articles; PubMed Central is clearly increasing public access to the biomedical literature and we are proud to be a partner in this effort.

Federally funded research articles should be made freely available as soon as possible so that science and the public benefit from their expanded use and application. At the same time, it is important that nonprofit societies and other publishers generate sufficient revenues to sustain the costs of reviewing and publishing articles. We believe that a six-month embargo period represents a reasonable compromise between the financial requirements of supporting a journal and the need for access to current research.

For these reasons, the ASCB supports efforts to require that the results of federally funded research be made freely available to the public, no more than six months after they are published.

Sincerely,

Handwritten signature of Timothy J. Mitchison in black ink.

Timothy J. Mitchison, PhD  
President  
The American Society for Cell Biology

Handwritten signature of Thomas D. Pollard in black ink.

Thomas D. Pollard, MD  
Chair, Public Policy Committee  
The American Society for Cell Biology