Sharpless, Katherine E.

From: Kathryn Holmes <HolmesK@asme.org>
Sent: Thursday, August 20, 2015 3:10 PM
To: Sharpless, Katherine E.
Cc: Philip DiVietro
Subject: National Institute of Standards and Technology Plan for Providing Access to the Results of Federally Funded Research (Federal Register Doc. 2015-16508)
Attachments: ASME Comments on NIST Public Access Plan.pdf

Dear Ms. Sharpless,

Please find attached a letter from ASME responding to your request for comments on the "National Institute of Standards and Technology Plan for Providing Access to the Results of Federally Funded Research" (Federal Register Doc. 2015-16508).

Please contact us if you have any questions.

Warm regards,

Kathryn

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August 20, 2015

Katherine Sharpless
National Institute of Standards and Technology
100 Bureau Drive Stop 4701
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Re: National Institute of Standards and Technology Plan for Providing Access to the Results of Federally Funded Research (Federal Register Doc. 2015-16508)

Dear Ms. Sharpless:

ASME appreciates the opportunity to comment on the National Institute of Standards and Technology (NIST) Plan for Providing Access to the Results of Federally Funded Research (Federal Register Doc. #2015-16508.)

With over 140,000 members, ASME (the American Society of Mechanical Engineers) is the largest mechanical engineering professional organization in the world. Since its founding in 1880, ASME has worked to advance public safety and the quality of life throughout the world. ASME's reputation as a "neutral convener" has been earned over these many decades by its deliberate embrace of all stakeholders in the consensus process and in facilitating a robust technical peer review process built on integrity and honesty.

ASME publishes 29 technical journals periodically highlighting the latest engineering research. Our organization annually publishes about 3,500 journal articles each year, authored by approximately 9,000 authors and researchers, many of whom are US researchers who acknowledge support from the US government. All of which are reviewed by some 7,500 subject matter expert editors and reviewers. ASME journals offer the highest quality peer-reviewed literature in their respective field of mechanical engineering. In terms of conferences proceedings, ASME publishes some 8,000 papers annually, representing the work of some 20,000 authors and the involvement of some 15,000 subject matter expert organizers and reviewers.

ASME endorses the dissemination of the results of all peer-reviewed research, including research supported by federal funding, but it must be done in a manner that is sustainable for the publishing community. It is critical to protect the authors' rights to their intellectual property, as well as the critical functions of peer review. Over the years, our organization has invested in technologies and innovations that enable and preserve high-quality digital peer review, production, distributions, interoperability and discovery of the latest scientific and scholarly works.

ASME, along with over 400 other members of the scholarly and professional publishing community, is a member of the Association of American Publishers (AAP). AAP has submitted comments to NIST providing detailed responses to the questions raised in your Request for Comments. We strongly endorse their letter and are in agreement with their recommendations, although we would like to elaborate on two of the challenges associated with implementing public access.

Federal investments in scientific research are vital contributors to our nation's economy and our national security. For decades, the U.S. has reaped the benefits of effective public-private partnerships. The best approach for

achieving greater public access for federally funded research is to continue to support public-private partnerships which will result in the broad dissemination of materials that analyze and interpret research while preserving the critical peer reviewed material, which is considered the "gold standard" of scientific communication and content

We urge you to partner with us in participating in the Clearinghouse for Open Research of the United States (CHORUS), a multi-publisher portal providing access to journal articles reporting on government-funded research. ASME, along with over 100 scholarly publishers, is a member of CHORUS which leverages existing infrastructure, tools, and services that support sharing, access, discoverability, reporting, and preservation. CHORUS also reduces the compliance burden on authors, and in turn increases compliance with public access goals.

ASME, along with the other scholarly publishers who are engaged in CHORUS, would welcome the opportunity to develop a partnership with NIST that would provide access to federally funded, peer reviewed research articles, while preserving the scholarly value of the peer reviewed version of record and maintaining an ever-growing archive in perpetuity. CHORUS would advance access without any new federal investments or burdensome requirements on researchers or their institutions. The U.S. Department of Energy (DoE) is currently utilizing CHORUS as a component of its model for providing public access to peer-reviewed articles that report on DOE-funded research.

We appreciate that your plan also provides an opportunity to be able to petition to lengthen embargo periods, as well as your recognition of the need to "effectively promote the quality and sustainability of scholarly publications while meeting the objectives of public access." In the comments provided by AAP, they provide various examples of evidenced based research, but a study that was prepared by Dr. Philip Davis entitled "Journal Usage Half-Life," specifically addresses usage half-lives of journals both within and across subject disciplines, including engineering. As stated in his study, "Just 3% percent of journals had usage half-lives of 12 months or less, which ranged from as low as 1% for Life Sciences Journals to as high as 6% for Engineering journals." Dr. Davis analyzed usage data of more than 2,800 journals from 13 scholarly publishers to show that the median half-life of journals is distributed between 24 and 60 months. In the case of engineering and technology subjects, the median half-life is greater than 36 months. We urge you to take his findings into consideration.

In the absence of any evidence to support 12 months as an appropriate embargo period, ASME recommends a 24 month embargo to ensure that we can fulfill our mission to the engineering community, as well as authors and scholars worldwide.

We appreciate the opportunity to provide you with our comments on the NIST Public Access Plan. We would welcome the opportunity to engage with NIST to discuss ways to determine appropriate and consistent implementation of embargo periods for specific scientific fields, and how to maximize the effectiveness of CHORUS to ensure the full benefits, reduced costs and decreased administrative burdens to NIST.

Thank you for the opportunity to present our views. Please contact Kathryn Holmes, Director, ASME Government Relations (holmesk@asme.org; 202.785.7390) if we can be of assistance.

Sincerely,

Philip DiVietro
Managing Director, ASME Publishing