

22 July 2014

Muthu Madhan
Manager, Library and Information Services
International Crops Research Institute for Semi-Arid Tropics (ICRISAT)
Patancheru, Hyderabad

By email only to madhan@dbt.nic.in

Dear Mr. Madhan,

The International Association of Scientific, Technical and Medical Publishers (“STM”) is the leading global trade association for academic and professional publishers. It has over 120 members in 21 countries, including some with offices in India, who each year collectively publish nearly 66% of all journal articles, the majority of the world’s English-language open access articles, and hundreds of thousands of monographs and reference works. STM members include learned societies, university presses, private companies, new starts and established players. We welcome the opportunity to make a contribution to the consultation on the draft DBT/DST Open Access Policy as invited by your notice dated 5 July 2014 and, as key stakeholders on the scholarly communications process, would like to partner with you in making it a success.

Like DBT/DST, STM member publishers believe that Society benefits from the pursuit, distribution, preservation, and usage of scientific discovery and knowledge. Our members are trusted partners of the international research community in these activities and an indispensable link in the chain of registering, certifying, formalising, improving, disseminating, preserving, and using scientific information – making long-term investments in publications around which emerging, and established scientific communities coalesce and evolve.

STM Member Publishers are also active funders of and participants in innovative technology initiatives such as ORCID (<http://orcid.org/>), an open, non-profit, community-based effort to create a registry to identify and disambiguate researchers/authors worldwide, as well as a proponent of FundRef (<http://www.crossref.org/fundref/>), a collaborative funding agency-publisher project that now provides a standard information technology solution for documenting and enabling the online discovery of funding sources acknowledged in the published scholarly literature. We would welcome the opportunity to discuss how DBT/DST might become involved in these collaborative public-private partnerships because these initiatives have the potential to address the specific issues of attribution and compliance mentioned in the policy. Based on our shared commitment to the integrity of the scientific record and sustainable open access publishing, we offer the following comments and hope that you will consider them as the beginning of a rich dialog that will further our mutual goals:

First, we believe there's opportunity to expand and clarify the policy regarding "gold" open access, whereby immediate access to the final published article, the "Version of Record" is funded by an article publishing/processing charge (APC). The policy states "...*DBT/DST will not underwrite article processing charges levied by some journals.*" Does this mean that the APCs of some journals are eligible for underwriting while the APCs of other journals are not, or was it intended to mean that not all journals offer APCs, but no APCs from the journals that do are eligible?

Although people of goodwill may differ in their views about different APCs, there is little disagreement among the key stakeholders in scholarly communication that the Version of Record has powerful potential to boost scientific advancement, job creation, and economic growth. For this reason funders worldwide generally consider the outlay for "gold" open access to be a legitimate use of grant awards and where it not required, it is allowed. They recognize that publishers incur significant costs in enabling the article to reach this level of utility and that those costs must be met to enable the continued production and publication of high-quality journal articles. Our member publishers would like to work with DBT/DST to find ways to fully include this option in the Open Access Policy and enable authors to publish in the journal of their choice, where publication will have the greatest potential to advance their field.

Second, we believe that the copyright interests of researchers, institutions, funders and publishers do not need to conflict and would welcome the opportunity to work with DBT and DST to identify and encourage an appropriate balance of rights and interests among all key stakeholders in scholarly publishing in India. We believe that any policy, rule or legislation has to be carefully crafted in view of that balance and in order to minimize the potential for unintended harm to the integrity and preservation of the scientific record. We recommend that any new policy be consistent with Indian copyright law or be based on rules that operate in harmony and side by side with the prevailing Indian legislation.

We note that models of access which focus on the final accepted manuscript, so-called "green" open access, are funded primarily by subscription revenue which publishers use to underwrite the infrastructure of peer review. Without that infrastructure, the efficiency and effectiveness of peer review are seriously compromised and social benefits significantly reduced. Because publishers rely on rights transfers as the legal basis for subscription and licensing activity, transferring necessary rights is critical to make "green" OA successful. Such transfers also enable publishers to handle claims with respect to plagiarism and related ethical issues, and are used as a tool in certain cases to determine the formal publication status of disputed articles.

Third, we note that the Policy suggests that "...*the period of embargo not be greater than one year.*" We applaud this recognition that flexible embargos should be the rule for the self-archiving/"green" open access approach currently described in the policy and would like to share further information we feel may be useful in both setting and adjusting them. Although journal subscriptions underwrite "the green road" by supporting the cost of peer review, they themselves are vulnerable to one-size-fits-all embargos that distort the relative importance of publications across scientific disciplines as measured by online article usage statistics – a key metric used by librarians worldwide to make purchasing decisions. Taking into account the differing usage patterns of different scientific fields allows policymakers to set embargo periods that avoid this distorting effect.

As you may be aware, late last year, a study was released by [Phil Davis, Ph.D.](#), an independent researcher and former science librarian, that analyzed lifetime usage data from 2,812 journals representing the works of 13 scholarly publishers in 10 distinct scholarly disciplines including life sciences, engineering, social sciences and the humanities – see http://www.publishers.org/_attachments/docs/journalusagehalf-life.pdf

Among its key findings were that journal article usage varies widely within and across disciplines; that it takes significant time for journals to experience half of the lifetime downloads (“half-life”) of their articles; that articles in the majority of journals receive more than half of their lifetime downloads three or more years after publication; and that only 3% of journals in all fields have half-lives of 12 months or less.

Because usage is a critical input to the decisions that most librarians make about subscriptions, the variation the study found in “usage half-life” suggests that the usage that librarians will see at their institution will be different for articles in different disciplines. Using the same cutoff point for all journals would thus inappropriately undervalue journals across entire disciplines by misrepresenting their relative value. Subsequent cancellations would remove potential key sources of knowledge from science and society. To avoid this unintended consequence of the single embargo we suggest that journal article usage data from the Davis study would be a useful initial metric in setting evidence-based embargoes for individual scientific disciplines and would welcome the opportunity to discuss this possibility further with you.

Fourth, for practical reasons we recommend that the time of deposit be moved from the time of acceptance to the time of publication. Articles at the acceptance stage lack key elements such as metadata and other identifiers that increase their usefulness to the scholarly community and the public.

Fifth, we note with interest the *DBT/DST author addendum* as a means of achieving the Policy’s goal of ensuring that authors have the right to place the full-text of the final accepted manuscript version in their institution’s repository and *DBT/DST Central*. We respectfully submit that this well-intentioned goal is already achieved under existing STM journal publishing agreements. In addition to the right to post on personal websites and repositories, standard journal agreements typically also allow authors to use their published paper in their own teaching and generally within their institution for educational purposes; to send copies to their research colleagues; and to re-use portions of their paper in further works or book chapters. Publishing agreements for most journals expressly provide for word-by-word quotations of appropriate excerpts from the “official record” and other scholarly uses and STM publishers continue to work directly with authors to respond to their evolving needs.

Finally, STM members exist to provide access to scholarly articles and have as their mission not only to ensure that articles are widely read and used, but also that they are preserved with integrity for the long term. A well-functioning and sustainable system of scholarly communication is a fundamental prerequisite to achieving open access objectives, and policies should be carefully considered to ensure the viability of that system. STM supports any access and re-use policies that are consistent with these goals and recommends a dialog between DBT/DST, our community, and other key stakeholders to collaboratively develop these important elements of a well-functioning open access environment.

We thank you for your kind consideration of our comments.

Respectfully submitted

For and on behalf of the International STM Association

A handwritten signature in dark ink, appearing to be 'Mabe', with a stylized flourish at the end.

Michael Mabe
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