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— *Quality Life Through Research* —

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August 17, 2004

Dr. Elias A. Zerhouni
Director
National Institutes of Health
Bethesda, Maryland 20892

Fax: 301-402-2700

Dear Dr. Zerhouni:

I appreciated the opportunity to participate in the July 28th meeting you conducted concerning the “open access” issue. While I am following up with written comments, I also request a private meeting in the near future to discuss these and other important matters.

The Federation of the American Societies for Experimental Biology (FASEB) is a consortium of 22 not-for-profit scientific societies representing more than 60,000 research scientists. These societies publish 59 scientific journals – some of which are the largest and most prestigious in the field of biology. The mission of these academic societies is to represent the interests of their scientist members, and to disseminate scientific information that has been validated through peer-review. I assure you that all are committed to efficiently disseminating science discoveries to investigators and the public while supporting the best innovations in publishing. I am confident we can continue this effort without coercion and demands for “one size fits all” solutions. Moreover, I believe it can be done without bringing harm to time-tested journals and the societies that publish them.

The Journal of Clinical Investigation (JCI), published by the American Society for Clinical Investigation (ASCI), is one of the most prestigious in medical research and has led the world in moving to “open access” by depositing it both in HighWire and PubMed Central. However, the average

publication cost per manuscript is approaching \$6,000 and is not expected to decline even if the print version is discontinued. Further, ASCI is uncertain if this approach will work in the future and cautions against anything that would force free access. (www.nature.com/nature/focus/accessdebate/14.html); and J. Hawley, personal communication). Rather, they believe that societies need time to adjust to the changes that have already occurred and are supportive of other approaches, as long as the research communities are well served.

Journals significantly subsidize the real costs of publication with revenue from subscriptions and advertising. These revenue sources would be eliminated if Federal mandates require content other than abstracts to be released too soon after acceptance. Without subscription and advertising revenue, author charges would have to increase substantially.

As a bench immunologist I value the role of my profession's journal in the advancement of our discipline. As a past President of The American Association of Immunologists (AAI), I know that the activities of our journal, *The Journal of Immunology* (*The JI*), endeavor to secure only enough net income to invest in new publishing technologies and content improvements. However, there is financial risk in any given year and *The JI* has, in certain years, realized a loss. Even in these years, AAI has maintained *The JI* as it is, first and foremost, committed to the reported science and to the integrity of the research archive provided by *The JI*.

While I respect the concern about rising subscription costs reported in "Access to Biomedical Research", prepared by NIH May 2004, the report does not take into consideration a major reason for increases, that is, increased costs born by publishers to support the unprecedented advances in publishing technology that have benefited users. The graph on page 5 documents the increase in subscription rates over the past 18 years; a time when publishing went from paper to digital. Further, it fails to distinguish between subscription rates of for-profit publishers and those of not-for-profit publishers who have not had comparable increases in rates.

As I commented at the meeting, I am concerned that the Report language is creating a distraction from another vital issue, sufficient funding for biomedical research. The end result of the Report language if implemented will be to further reduce funds available for NIH research in a year when NIH is facing devastating budget reductions. Although no financial plan has been presented, expanding the role of the National Library of Medicine will be extremely expensive, with no certainty that it

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would be sustainable in perpetuity. Furthermore, PubMed Central should not be the sole repository for scientific information. The Report language substitutes a “big government” program for a decentralized competitive and highly efficient system of publishing.

The Report language recommended by Congressman Istook would provide legislative advantage to one model of publishing (“open access”) to the detriment of all other models. I was relieved to hear you say that was not your intention.

You noted that the *status quo* can’t stand, but I respectfully point out that this is already a time of rapid change. Innovations and advances in publishing and scientific dissemination in the last decade have surpassed our imaginations – and they have been largely driven and supported by not-for-profit professional societies. It is important for any mandated policies that radically change STM publishing to follow honest debate with all stakeholders participating; let us first do no harm.

NIH is critical in this debate and as such, this is another opportunity for your leadership to make an important difference. Since becoming Director, you have confronted many highly contentious issues, bringing a calm and reasoned approach to solving those problems. I sincerely hope that will again be the case.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul W. Kincade". The signature is fluid and cursive, with a large initial "P" and "K".

Paul W. Kincade, Ph.D.
FASEB President