



July 20, 2015

Suzanne Plimpton  
Reports Clearance Officer  
National Science Foundation  
4201 Wilson Boulevard, Room 1265  
Arlington, VA 22230

**RE: National Science Foundation Proposal/Award Information—NSF Proposal and Award Policies and Procedures Guide**

I am writing on behalf of John Wiley & Sons, the leading American publisher of scholarly research. Wiley was founded in 1807 and has 2,600 employees across the country. We publish over 1,600 journals across all major disciplines and partner with over 1,200 non-profit professional and scholarly societies, which represent nearly 15 million researchers around the world.

Wiley is committed to working with funders, researchers and other stakeholders to expand access to high-quality, peer-reviewed articles. Together we can develop sustainable models that expand access and strengthen the system of scholarly communication by recognizing the investments publishers make in managing peer-review, publishing and disseminating articles, and preserving research for the future.

We appreciate the opportunity to provide comments on the latest revision of the NSF Proposal and Award Policies and Procedures Guide (PAPPG), in particular the incorporation of requirements related to NSF's new public access plan, *Today's Data, Tomorrow's Discoveries*, released on March 18, 2015.

*Embargoes and Petitions*

We greatly appreciate NSF's recognition that flexibility, not a one-size-fits-all approach, must serve as a guiding principle as it works with its various research communities to determine the most appropriate and sustainable way to expand access to published research. As Director Córdova stated in the Foreword to NSF's public access plan, the agency is unique in funding "all branches of science and engineering," and thus the plan "necessarily accommodates the diverse array of research results gathered by NSF-funded Principal Investigators."

Specifically, we are grateful that NSF has begun to develop a thoughtful and viable mechanism for allowing the public to petition to modify the initial 12-month embargo period in order to "more effectively promote the quality and sustainability of scholarly publications while meeting the objectives of public access." While 12 months may represent a sustainable embargo period for certain rapidly-moving scientific disciplines, we are concerned that such a period could be too short for many publishers and societies to recoup their investments in the peer-review and publishing processes and continue to produce the highest-quality scientific research literature. A variable approach to embargoes has been taken by other funders around the world such as the Research Councils UK, which set an initial 12-month embargo for STEM disciplines and a 24-month embargo for the arts, humanities and social sciences in cases where funds for article processing charges are unavailable.

The NSF's petitions mechanism establishes an important safeguard to ensure that its public access policy can achieve the goal of accommodating the diversity of disciplines funded by the agency. We look

forward to further discussions with NSF on the development of a strong petitions mechanism and hope that such a high-standard safeguard and flexible approach can become a model for other agencies.

### *Implementation and Repositories*

We encourage NSF to continue in its efforts to leverage existing infrastructure and partner with the research community as it implements its public access plan. To this end we are pleased to learn that NSF will work with the Department of Energy to use the DOE PAGES system, which offers the flexibility of a distributed system. Distributed systems allow agencies to take advantage of innovative public-private partnerships that can save taxpayer dollars and, as the NSF plan notes, avoid “unnecessary duplication of submission and the associated burdens on the awardees and investigators, or the risk of multiple or inconsistent versions.”

Wiley and a coalition of other publishers and societies, who collectively publish the vast majority of articles reporting on federally-funded research, are committed to helping agencies implement their public access plans through the Clearinghouse for the Open Research of the United States (CHORUS). This innovative public-private partnership recently signed a Participation Agreement with DOE to support the PAGES system. We look forward to future discussions with NSF and other agencies on how CHORUS can be leveraged to support implementation of their public access plans in a way that minimizes researcher and administrator burden

### *Digital Data Sets*

In addition to journal articles, Wiley is committed to working with its authors and agencies to enable greater access to digital data. In June 2015, Wiley announced an exciting new partnership with the data repository organization Figshare to integrate data sharing within existing journal workflows and article publication. The new data sharing service is being piloted with a number of titles and rolled out over the following few months along with new data citation and data sharing policies. This will ensure that more data is accessible, sharable and reproducible under a creative commons license as a consequence of authors publishing their articles on Wiley Online Library, without any cost to the author or readers.

We look forward to further discussions with NSF as it seeks to promote data sharing over the coming years and elaborate on its existing Data Management Plan requirement. In particular, we appreciate that NSF will seek to explore “options to leverage existing data repositories” instead of creating duplicative new repositories and would encourage the agency to align its efforts with ongoing activities in the research community.

Thank you for your consideration of these comments regarding the proposed revision of the NSF PAPPG and new public access plan. We look forward to collaborating with NSF as it refines and implements its public access plan over the coming months and remain committed to strengthening the system of scholarly communication for researchers in the United States around the world.

Sincerely,



Andrew Tein

Vice President, Global Government Affairs

e-mail: [antein@wiley.com](mailto:antein@wiley.com)

T: +1 201 748 7751