July 29, 2013

Dr. Michael J. Stebbins  
Assistant Director, Biotechnology  
Office of Science and Technology Policy  
1650 Pennsylvania Ave  
Washington DC  20504  

RE: Joint Society Letter, Public Access Data Policies  

Dear Dr. Stebbins,

On behalf of the undersigned professional societies, we acknowledge and recognize the value of better public access to scientific data generated by federal research investments and the resulting impact that can be achieved for new science and technology innovations. Dr. John P. Holdren’s guidance memo of February 22, 2013, outlines a plan for reviewing the Administration’s department and agency public access policies and includes directives for this specific purpose on scientific data policy.

As you review input from federal departments and agencies, we encourage OSTP to consider a separate public access plan and timeline for scientific data beyond that for public access for publications and data directly associated with scholarly publications.

Defining scientific data, including associated metadata, data standards and methods, and related data curation challenges, will most certainly require a series of steps and decisions that cannot be quickly implemented, and also will not likely be applicable using a common methodology across all areas of scientific endeavor. The specific topic of general public access to scientific data has not received the same level of discussion and community dialogue that has been the case over many years for scholarly publishing and associated data sets. The scientific community will benefit from such discussion and dialogue. In fact, there may be a need to identify the most relevant topics for initial consideration, as well as associated focused studies and examples.

We endorse the idea of a data task force raised by AAU, APLU, and ARL in their submission to the National Research Council on May 16, 2013, and believe it should engage not only federal departments and agencies, but also the stakeholders identified in the OSTP memo – e.g. federally funded researchers, universities, libraries, publishers, users of federally funded research results, and civil society groups. If such a group is assembled, we would certainly welcome the opportunity to participate and assist as needed.

It is our hope that by taking a task force approach to public access to scientific data, OSTP will increase the chance of producing data policies that can be implemented within the bounds of restricted federal budget environments, with major impact on areas of the greatest benefit to the scientific community. This approach should also minimize policy implementation challenges, including but not limited to multiple metadata standards, intellectual property rights, storage and access methods and restrictions, and impact and access within the global scientific research community.

Thank you for your personal efforts on behalf of the scientific enterprise.

Sincerely,

Ms. Madeleine Jacobs, Executive Director & CEO  
American Chemical Society  
Dr. Michael S. Turner, President  
American Physical Society

Dr. H. Frederick Dylla, Executive Director and CEO  
American Institute of Physics  
Mr. Marc T. Apter  
IEEE-USA President

Dr. John Haynes, CEO  
AIP Publishing LLC  
Dr. Orlando Auciello, President  
Materials Research Society

cc: Dr. John P. Holdren, Assistant to the President for Science and Technology, Director OSTP  
Dr. Philip Rubin, Associate Director of Science, OSTP  
Mr. Thomas A. Kalil, Deputy Director for Technology and Innovation, OSTP