



Thursday, January 9, 2020

The Honorable Kelvin Droegemeier  
Director, Office of Science and Technology Policy

Dear Dr. Droegemeier,

I am writing on behalf of the Association for Computing Machinery (ACM) regarding a proposed Executive Order that would mandate immediate changes to scientific publishing by eliminating the one-year embargo for results of federally funded research. ACM was one of 135 scientific publishers and organizations that endorsed a letter to President Trump addressing this topic on December 18, 2019.

The content and tone of that letter did not really address our rationale for opposing the changes, however, nor our longstanding commitment to Open Access. We regret having signed with the coalition, since the final letter did not adequately represent the views of our membership and the computing community.

ACM's primary concern with the proposed directive is that it was drafted without first having significant dialogue with key stakeholders, including universities, researchers, scientific societies, and commercial scientific publishers. In consequence, the mandate fails to take into account the evidence-based work our groups conducted prior to the 2013 directive, the significant progress that ACM and other societies have made in developing sustainable models for Open Access publication, and the difficulties an immediate zero-embargo policy could create for the scientific publishing ecosystem.

ACM, like many of our sister societies, is in the process of transitioning to a future where all peer-reviewed scholarly articles – not just those resulting from federal funding – will be immediately available to researchers and the public at no cost. ACM already allows authors to make the accepted version of their works publicly available through non-commercial repositories without an embargo period, as well as allowing ACM-sponsored conferences to grant public access through their websites.

ACM believes that achieving full Open Access will benefit the field of computing significantly by increasing the sharing and citation of research accomplishments. Furthermore, we believe that if done correctly a zero embargo mandate could benefit the scientific community without becoming an existential threat for societies or publishers. But such a major transition takes time and needs to be done in a way that ensures sustainability. Publishers need time to transition to funding models that can provide full Open Access while sustaining the ability to publish.

Rather than mandating an immediate change to the current one-year embargo on federally-funded research, we encourage OSTP to engage with a broad array of stakeholders to collaboratively discuss models for publishing, curating, and archiving scientific results that will achieve complete openness in scientific research. To that end, ACM looks forward to engaging with you and with all interested parties in a forward-looking and constructive manner.

Respectfully,

Cherri M. Pancake, ACM President