



THE SCHOLARLY PUBLISHING  
& ACADEMIC RESOURCES COALITION

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May 24, 2005

The Honorable Ralph Regula  
Chairman  
Subcommittee on Labor, Health and Human Services,  
Education, and Related Agencies  
Committee on Appropriations  
United States House of Representatives  
Room 2358  
Rayburn House Office Building  
Washington, DC 20515-6024

Dear Mr. Regula:

I am writing on behalf of leading national organizations of libraries and public interest organizations in the United States that support barrier-free access to taxpayer-funded research. These include the American Association of Law Libraries, the Association of Academic Health Sciences Libraries, the Association of College and Research Libraries, the American Library Association, the Association of Research Libraries, the Medical Library Association, Public Knowledge, Public Library of Science, and SPARC (Scholarly Publishing and Academic Resources Coalition).

We want to express our enthusiastic support for continuation of PubChem, an immensely useful project underway at the National Center for Biotechnology Information (NCBI) in the National Institutes of Health (NIH).

PubChem represents a vital next step for NIH in leveraging its investment in the human genome project, filling in the picture of small molecules. It is a powerful tool that enables medical researchers to harness NIH-funded and other public resources about chemical structures so that they can advance development of new medications. By simply clicking on links, researchers navigate through the range of information resources housed at NCBI – for example, searching on a chemical name, viewing its structure in PubChem, and finding articles that refer to it in PubMed Central. By ensuring that publicly financed knowledge is broadly accessible on the Internet in this way, NIH is enhancing the return on public investment in research and stimulating further innovation by public and private scientific enterprises.

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It is our understanding from press reports that the American Chemical Society (ACS) has called for NIH to unreasonably restrict PubChem, claiming it threatens the financial viability of ACS's Chemical Abstracts Service (CAS). We believe that their concern is unfounded and that the American public is well served by continued development and maintenance of PubChem. Moreover, we feel it is not right for ACS/CAS – a tax-exempt organization that received funding from the National Science Foundation to create their chemical registry system – to now be lobbying against taxpayers' interests in this matter.

We reject the ACS contention that PubChem will compete with the giant CAS. Not only is it implausible that NIH's modestly funded program would be a substitute for the wide range of resources integrated by CAS, but there appears to be remarkably little overlap in either content or likely users of PubChem and CAS.

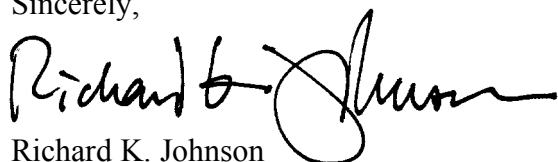
The taxpayer benefits of PubChem far outweigh any advantage in acceding to the ACS call to be protected. The prohibitively high price of CAS services limits their availability. For example, only about 1,000 universities have access to the CAS SciFinder Scholar service. That is a fraction of the thousands of institutions worldwide that support users who would benefit from access to PubChem.

As you may know, PubChem is a critical component of NIH's Molecular Libraries initiative, which in turn is a lynchpin of the NIH strategic Roadmap to enhance health care and speed delivery of new medical treatments. Indeed, the directors of the NIH institutes unanimously rank the Molecular Libraries initiative as the highest priority of the NIH Roadmap. It is a mistake to endanger the promise of the Roadmap by imposing restrictions on PubChem that fundamentally undermine its utility. There is simply too much at stake.

We are grateful for your leadership on the recent NIH Public Access Policy, which offers immense potential to advance science. In the same vein, we encourage you to support PubChem and the broader Molecular Libraries initiative at NIH.

Thank you for the opportunity to share our perspectives with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard K. Johnson". The signature is fluid and cursive, with a large, stylized initial "R" and "J".

Richard K. Johnson

Executive Director

Scholarly Publishing and Academic Resources Coalition