![STM — Advancing trusted research]

June 30, 2025

Senator Mike Rounds
Hart Senate Office Bldg., Suite 716
Washington, D.C. 20510
asap@rounds.senate.gov

Senator Martin Heinrich
Hart Senate Office Building, Suite 709
Washington, D.C. 20510
asap@heinrich.senate.gov

Dear Senators:

Thank you for the opportunity to provide information for your American Science Acceleration Project (ASAP). STM is excited about this initiative, as it aligns with our members' work to advance trusted research. As partners with researchers, institutions, federal agencies and other funders, research libraries and others in providing access to information related to the latest discoveries and innovations, STM and its more than 150 members help accelerate the pace of scientific innovation by providing the information, infrastructure, discovery and workflow tools that enable the progress of science and technology.

Our members, which include American scholarly societies, commercial publishers, university presses, and others in the scientific publishing community, work on behalf of millions of scientists, medical professionals, engineers, and other researchers and members of the public in their membership, authorship, and readership. Most of our members are small businesses, and their work ensures the reach and utility of vetted and unbiased information that advances public health, technological innovation, and economic growth in our country. They make significant investments in infrastructure, systems, and people to promote access to trusted information. STM therefore welcomes ongoing engagement with the ASAP initiative and would be happy to share our expertise and experience with developing the infrastructure and tools that make science and innovation work.

STM regularly develops reports, funds studies, and comments on federal initiatives, many of which address the topics raised in the ASAP Request for Information (RFI). We therefore will mainly share here links to these resources, and welcome additional dialogue and questions on the topics as you move forward with your efforts. Below we list headings broadly aligned with the questions in the RFI and provide a description of key resources that may be helpful to you and your staff as you further explore the issues raised in the RFI and by the ASAP initiative more broadly.

Infrastructure

STM and its members have developed much of the infrastructure that is needed to advance scientific innovation. Our operational arm, STM Solutions, develops and monitors the standards and shared infrastructure needed to promote and accelerate scientific discovery and technological developments. A recent report funded by STM and developed independently by Ithaka S+R describes the infrastructure needs to ensure scientific productivity and improve trust and innovation in our digital age. Our recent STM Trends report describes some of the new coalitions needed to fortify the foundations of trust in research.

The critical nature of the scholarly publishing infrastructure for innovation means that an essential part of accelerating research will ensure the continued availability of the scholarly publishing ecosystem. That means that federal regulations must not stifle or undermine the free and competitive marketplace for innovation and investments in scholarly communication. Federal agencies should provide grantees with support for publishing and allow flexibility in any regulations that impact their publishing approaches.

Data ecosystem

The sharing and availability of scientific data has the potential to vastly accelerate American science, as long as it is annotated, linked, and made available in a way that allows it to be used effectively and efficiently. Raw data is not useful without appropriate metadata and context, and it cannot advance trusted science unless it is also discoverable. An overview of some issues in data sharing is provided in this presentation by STM's Eefke Smit; while quite old, it provides a framework for issues that persist to this day. More recently, STM issued a revised joint statement on research data with others in the ecosystem that highlights best practices for data sharing to accelerate research. STM is also a partner in Scholix, which enables discoverability and interlinking between data objects, publications, and other resources to advance innovation. Continued investment will be necessary, which requires a well-functioning marketplace and scholarly publishing industry.

Artificial intelligence

AI will be a critical part of accelerating research innovation and technological development, but only if AI tools are accurate and can be trusted. STM has provided input to OSTP's Request for Information on both the US Artificial Intelligence Action Plan and the US Artificial Intelligence Research and Development Strategic Plan. These responses discuss the importance of accuracy in AI for scientific advancement, and the role that transparency, respect for intellectual property, and accountability will play in ensuring

trustworthy AI for accelerating research. They also cite STM's report on Ethical and Practical Guidelines for the Use of Generative AI in science and a study commissioned by STM on Generative AI and Scholarly Publishing from Ithaka S+R that provide insights into how AI can be used responsibly and effectively to transform scholarly communication. Current STM work includes forthcoming guidance on best practices for training LLMs and AI on research outputs.

Intellectual property

The RFI asks the question: "*In what ways should intellectual property laws evolve to provide greater regulatory clarity and better facilitate AI-accelerated scientific discoveries?*" STM believes that current intellectual property law is sufficient to support AI and AI-acceleration of science. Licensing is effectively being used by publishers and AI developers to responsibly and effectively capitalize on the quality and trustworthiness of the scholarly record to improve AI systems and ensure that they can accurately and efficiently advance innovation. An STM webinar discusses intellectual property and generative AI in detail. In coalition with other rightsholder organizations, STM issued a statement on "Intellectual Property for Innovation" to comment on European intellectual property developments and submitted "three key principles for copyright and generative AI policy" in response to a similar question raised in the United Kingdom. In the US, the Copyright Alliance has a similar list of principles for AI. As noted in our RFI submission on the US AI Action Plan, the ability of AI to accelerate breakthrough research depends on intellectual property protection and enforcement for the functioning of the scholarly communications ecosystem and the continued viability of a scholarly communications industry and ecosystem.

Thank you again for the opportunity to submit these comments, and we look forward to continued engagement with your offices as the ASAP initiative progresses. Please do not hesitate to reach out with any questions or if we can otherwise support the initiative and policy development. Feel free to contact me at weinreich@stm-assoc.org or 202-599-0639.

Sincerely,

David Weinreich
Director, Policy and Government Relations