



Healthy Plants • Healthy World

March 5, 2020

To: The Office of Science and Technology Policy

Subject: Request for Public Comment on Draft Desirable Characteristics of Repositories for Managing and Sharing Data Resulting from Federally Funded Research (hereafter referred to as the Draft)

The American Phytopathological Society (APS) is a non-profit, professional scientific organization with a mission to discover and disseminate new knowledge of plant systems worldwide and promote economically and environmentally sustainable practices to ensure plant health. The society's nearly 5,000 members represent academia, government, industry and private practice. As a society, we are committed to integrating fundamental and applied knowledge into applications for reducing the destructive effects of plant diseases and fostering the sustainable health and productivity of plant ecosystems.

The APS supports the principle of developing clear characteristics for repositories for managing and sharing data resulting from federally-funded research. The Draft provides a comprehensive strategy for moving our communities forward. We would like to submit the following comments on behalf of our society:

With respect to **Section I. Desirable Characteristics for All Data Repositories:**

- *A-E, G, J:* We strongly support the usefulness of these characteristics.
- *F: Free and easy to access and reuse:* We recommend inclusion of mechanisms for tracking of ~~use/reuse or~~ downloads of data.
- *H: Secure:* ~~This section refers to “unauthorized” access or release. If the data are “free”, what would constitute unauthorized access or release?~~ We recommend inclusion of **explicit definitions and** proposed strategies for detecting unauthorized access or release.
- *I: Privacy:* We encourage incorporation of language to protect locational information for data collected from private lands (e.g., agricultural datasets). Such locational information can be a requirement for data sharing by growers and producers. We also encourage the incorporation of approaches to enable aggregating data to enable data sharing while still

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- protecting privacy. An example would be aggregated agricultural data across regions while protecting the location of individual growers, such as their land values.
- *K: Provenance*: The value of the data, and the provenance, would be strengthened by capacity to include information to track publications associated with specific datasets. Requested (required?) reporting of publications/DOI associated with publications that incorporate any publicly-accessed data would be a valuable inclusion to the dataset, and multiply the visibility of federal investments.

Sincerely,
Gwyn A. Beattie (Chair) and Linda Kinkel (Member)
American Phytopathological Society Public Policy Board

