

Mr Phillip Griggs
Competition Policy Branch
Office of Fair Trading
Fleetbank House
2-6 Salisbury Square
LONDON
EC47 8JX

Dear Mr Griggs

Re: "The market for scientific, technical and medical journals".

The Consortium of University Research Libraries (CURL) and the Society of College, National and University Libraries (SCONUL) wish to respond on behalf of the national libraries and academic libraries in the UK and the Republic of Ireland to the recent OFT statement on the STM journals market. The general reaction from the library community is of appreciation that the malfunctioning of the journals market has been recognised but disappointment that the OFT is unwilling to take action to improve the situation.

CURL and SCONUL wish to make the following points:

1. The OFT analysis of the "key features of the market for STM journals" is accurate.
2. The "evidence that the market may not be working well" is presented fairly.
3. The description of the "factors which might prevent competition working" is also accurate.
4. Chapter 7 of the OFT statement, "Might competition work better from now on?", mentions some of the more significant movements to introduce competition but fails to mention the small scale of these movements in comparison to the size of the commercial journals market.
5. The statement is accurate in pointing to the success of initiatives like the SPARC journals in introducing competition but fails to recognize the need to support the initiatives already underway if these initiatives are to achieve further improvement in the journals market.
6. The OFT's conclusion - while acknowledging that the market is not working well - that this is not "a matter warranting further investigation" will not assist the library community to provide a more efficient and cost-effective service to library users.
7. A 'laissez-faire' policy will do little to address the Government's concerns about support for UK science, as expressed in the 'Cross cutting review of science and research', commissioned recently by the Treasury. Until the market for scientific journals has been brought to a state of normal operation, UK universities and research institutes will continue to find that information vital to their activity is difficult to come by or expensive to obtain, or both.
8. CURL and SCONUL are willing to assist the OFT in monitoring further developments by identifying relevant performance indicators and measuring the effectiveness of competition on the overall performance of the STM journals market.

Yours sincerely

Dr Tom Graham
University Librarian, University of Newcastle and Chair of the CURL Board