

## Response – Distribution and Licensing Policy Framework Discussion Paper

The Council of Australian University Librarians (CAUL) is the peak leadership organisation for university libraries in Australia. CAUL members are the University Librarians or equivalent of the 39 institutions that have representation on Universities Australia and the 8 members of the Council of New Zealand University Librarians (CONZUL). University libraries are diverse institutions, which intersect core university business.

CAUL's vision is that society is transformed through the power of research, teaching and learning. University libraries are essential knowledge and information infrastructures that enable student achievement and research excellence. CAUL makes a significant contribution to higher education strategy, policy and outcomes through a commitment to a shared purpose:

**To transform how people experience knowledge – how it can be discovered, used and shared.**

University libraries and library organisations broadly play a leading role in enabling fair, affordable and open access to knowledge. They are also instrumental in building society's capacity for digital dexterity – fluency in the use of digital technology, skills and essential literacies.

CAUL is grateful for this opportunity to provide a response to the Distribution and Licensing Policy Framework Discussion Paper by [Standards Australia](#). This response provides feedback in relation to discussion paper questions A – O. Recommendations and comments are organised under the related question headings.

## Recommendation and comments

### 1. Broad principles underpinning a distribution and licensing framework

A. *Do you agree with Standards Australia's (SA) broad objectives?*

B. *Are there other broad objectives that should be considered by SA's Board?*

We agree with the broad objectives outlined in the discussion paper but would like to see the following inclusions:

- Not-for-profit and Open Access (OA).
- Commitment to facilitate public access to the standards (in a sustainable way)
- Specific requirements of students (TAFE and Uni.)
- Platform usability and access.

Our view is that standards about building accessibility and other public good should be freely available OA as a part of a commitment to social responsibility and equity. Standards that cover business purposes particularly those within universities should be developed with current usage and demand in mind, for example, universities are increasingly using contractors for design and construction and thus the need for these kinds of standards is decreasing.

## 2. The means by which SA intends to achieve its objectives

*C. Do you support a non-exclusive model for the distribution of standards content in Australia?*

We support the use of a non-exclusive model for the distribution of standards content in Australia.

## 3. Partnering to distribute current products

*D. What criteria do you think should be applied to the selection of distribution partners?*

Distribution partners should be selected based on their experience in the robust and sophisticated provision of electronic content and on the basis of their ability to provide platform functionality, access, and licencing and pricing models for specific groups of users and content.

Platform functionality criteria:

- The platform supports course reading lists for multiple users with adjustable time constraints or a stable link to the standard that can be included in course reading list software.
- The platform offers remote access without requiring individual usernames and passwords, eg. supports authentication by IP, EZproxy, Open Athens.
- The platform has ease of access/navigation, and is WCAG 2.0 accessibility.
- The platform supports the personalisation of features for students such as allowing them to save their search results, be notified of new versions, etc.
- The platform can be used with multiple internet browsers, devices and operating systems; and have the least amount of restrictions (non-expiring standards).
- The platform provides meaningful usage statistics.

Access, licencing and pricing models for specific groups of users:

- Concessional educational licencing and pricing to universities and TAFE.
- An unlimited user model based on user FTE (Full Time Equivalent) such as students and staff.
- Commitment to sustainable reasonable price increases in line with CPI.
- Minimise requirement for limited or concurrent usage models which impact timely access.

Content:

- Standards from other international bodies could be offered.
- Content could be indexed by library discovery tools such as EDS, Primo and Summon.
- Content should be OA and available as PDF, HTML and in other appropriate formats.

*E. How can SA encourage competition in the distribution of current standards products?*

Competition in the distribution of current standards products can be encouraged by:

- Ensuring the selection criteria for distribution partners specifies the expectations in the provision of electronic resources so that all partners meet minimum standards.
- Working with sector or representative bodies such as CAUL for University models and other Consortia or Business groups depending on the stakeholders involved.
- Developing license conditions or clauses that allow specific market segments to use the standards in the ways that are most helpful to them.
- Taking greater responsibility for any future preferred distributors by holding them accountable for service quality, for example through benchmarking exercises.
- Providing a formal mechanism for feedback from the user community about distributors.

#### **4. Encouraging innovation**

*F. How do we encourage new innovators to engage with standards content to deliver new solutions and customer offerings?*

Providers should have flexible parameters that allow experimentation with delivery of content to customers. However, customers must then also have flexible usage terms that allow them to take advantage of new delivery models including taking up what might be unexpected outcomes. This may require a partnership arrangement between providers and customers

*G. How do we select innovative partners?*

Innovative partners can be selected using specific feedback from the user communities on what they need from the content or sub sections of content and then develop the conditions of use/variations to facilitate that while still maintaining the 'source of truth' of the underlying standard. The partners can then develop the value adds. Partners may be industry groups or organisations or commercial developers. Selection should be based on providers with an established track record for innovation and customer engagement.

*H. How do we ensure third party developed innovative products are good quality and fit for purpose?*

The quality of innovative products developed by third parties can be evaluated by:

- Client and Standards Australia reviews or scoping exercises.
- Involving customers in the development and testing lifecycle of products, for example through feedback surveys or testing on beta platforms.

*General response for questions F - H*

The examples presented were all based on private commercial use. We would like to note the importance of discussions with stakeholders in the higher education sector to ensure that potential innovations would not adversely affects dissemination or use of the standards there. Students in the higher education sector (University or TAFE) are the potential users of standards in their career so innovations must not limit their ability to discover and use the standards. Specifically, with regard to point H it is important to ensure that products are also fit for purpose in the education sector.

There are currently many third-party platforms and vendors in the higher education sector that are able to maintain this balance, many already have fit for purpose platforms that Standards Australia could feed their content onto. It is CAUL's view that a new platform that meets requirements does not need to be created/built.

*I. How do we ensure we strike the right balance between facilitating innovation by third parties and maintaining the financial sustainability of Standards Australia?*

Standards users have to feel they are not being ripped off. Most would be prepared to pay a fair and sustainable charge, and if that is set appropriately, Standards Australia is likely to see more sales and use that should make up a sustainable level of income. Third parties should not feel able to gouge the market. If the innovation is of value, customers will decide if it is worth a premium.

## 5. Mitigating potential conflicts

*J. How can Standards Australia ensure that distribution activities do not negatively impact its public benefit role in standards development?*

A broad and fair educational licence for the use of the standards in the higher education sector would greatly benefit the public benefit role in standards development. Often higher education institutions have different licensing terms than those that use the content for commercial purposes. This takes into account that they are using the content to educate future users of the content once they become professionals.

Other steps to ensure that distribution activities do not negatively impact public benefits may include:

- Making content OA or if not, then allow subscriptions to individual Standards, rather than 'everything'.
- Allowing individual purchase from the Standards Australia website, or through a third party such as ebay or Amazon at cost recovery.
- Providing access to the base content at a fair rate, then value add innovation can be left as a market choice. There may be variations to this on some specific standards, but base access remains important.

### 6.1 Regulated standards

*L. How can Regulated Standards be made more accessible to the end user while maintaining the financial sustainability of the standards ecosystem?*

A flexible purchase system where customers have a variety of affordable options that can be mixed and matched to suit the customer needs e.g. some content may be obtained by purchasing one or more selected modules, but the customer could have the option to cherry pick individual titles that they wish to add to their accessible content. Standards Australia could offer businesses and individuals the ability to purchase/subscribe to small subject based collections, for example IEEE's VuSpec Collections.

### 6.2 Access for core user groups at early stages of a career

*M. How can access beyond existing channels be made easier for user groups like TAFE and university students?*

Access beyond existing channels can be made easier for groups like students by addressing pricing and licence conditions.

Groups like students **DO NOT** purchase standards themselves and therefore mechanisms like pricing models or discounts for students are irrelevant. Transparent pricing model and willingness to work with stakeholders such as library consortia will help to make access easier for students. This could be achieved by developing a fair model (FTE based) for unlimited user access to all Australian Standards that will make all standards available for all students to use as they need. At present pricing and increases depended in part on the individual institutions' relationship with their SAI Global representative and success in negotiating pricing reductions. Subscriptions to standards should be offered at a fair cost, without excessive (over and above CPI) annual increases.

To improve access licence conditions could:

- Allow for normal academic uses, such as course packs and electronic reserve through a version provided for 'educational use'.
- Move away from concurrent seats/access restrictions to institutional access bearing in mind that just because an institution has tens of thousands of students, only a few are going to be users of the standards regularly. The others however should have access if they need it.
- Provide flexibility with regards to access for learning and teaching purposes.
- Include a clause that allows limited reproduction or similar in teaching environments.
- Include a clause for some industry groups to facilitate access for apprentices/early career members through membership level authentication.
- Reduce the use of Digital Rights Management (DRM) or concurrent user restrictions.
- Include conditions or clauses that allow specific market segments to use the standards in the ways that are most helpful to those segments. This may mean some users pay a premium of sorts to enable the use/approach that they need. Different distributors could then develop the delivery or interface to meet those needs.

### **6.3 Providing useful information to consumers regarding Consumer Interest Standards**

*N. How can useful information be better provided to the public regarding Consumer Interest Standards?*

Plain English guides would help improve public access to Consumer Interest Standards and making it possible for public libraries to subscribe to the standards would help promote information about them. This could be achieved by releasing a sub-collection of Consumer Interest Standards.

*O. Do you have a view on what types of partners SA could work with in providing better information to the public regarding Consumer Interest Standards?*

There are a number of partners that Standards Australia could work with to provide better information to the public, these include:

- Library distributors. Public libraries, and state libraries
- Amazon Australia or similar companies.
- Online eBook resellers.
- Partner with Choice to have standards related to selected product reviews available through their site as part of the Choice membership.
- Industry associations.
- Consumer Affairs.
- Global company/companies like British Standards Online