We thank NISO for the opportunity to respond to the draft “Reproducibility Badging and Definitions”, and we applaud the effort to create a standardized badging scheme. Below are our comments and suggestions.

- While there is acknowledgement of a “proliferation of badging schemes and their interpretations in the community”, there is no additional detail about the various existing badges. Information about these badges, including how they are used and why they are inadequate, would be helpful.
- The targeted audience is unclear. We suggest clearly identifying the intended audience for this document. Is it aimed at publishers of research and, if so, how is it intended to be distributed to this community and encouraged to be adopted? We expect there could be a need for additional documentation aimed at the researcher community.
- We recommend addressing when a badge can be issued, particularly in regards to embargoed data and code.
- We recommend clarification on the “central entity”. Is it NISO, NASEM, a joint effort, or other?

Section 2.2 Research Objects Reviewed (ROR)
- In terms of objects that cannot be open: If certification is completed for objects that are not currently open, consider outlining an approval process that takes into account additional permissions to view / validate the data.
- Consider adding guidance for cases in which the external reviews of objects cannot be open in terms of the language required for IRB. Would NASEM or NISO provide language or would that be the responsibility of the journals, researcher, or other?
- Consider adding guidance regarding how the certification of reproduced results would be funded. Would that be something a journal would fund or would the authors have to pay for the service? Will authors have to consent?
- We recommend that the tools used for certification be open source or independent platforms when possible. A badge should last into the future, and proprietary software and companies may not.

Section 2.4 Results Replicated (RER)
This would be very difficult to implement. It would require keeping up with the literature for years after publication, or intervention by the author when replication happens, both of which are difficult.

Section 3.2 Badge Metadata
- We suggest including required fields in addition to recommended minimum fields.
- We disagree that there is "no need for badges to be findable independent of the articles". We see value in having the badges available for data mining and research itself, even if only available by API. Being able to locate badges for this purpose could also reinforce the badging by showing that the badge is verifiable.

Section 3.4 Badge Help
- This should be a requirement and not a recommendation.

Section 3.6 Badge Revocation
- We suggest creating standardized vocabularies for reasons a badge is revoked.