



NHPRC DRAFT ANNOUNCEMENTS
ONLINE PUBLISHING OF HISTORICAL RECORDS &
PUBLISHING HISTORICAL RECORDS ONLINE: TRANSITION SUPPORT

COMMENTS OF THE ASSOCIATION OF AMERICAN UNIVERSITY PRESSES

Introduction

The Association of American University Presses (AAUP) appreciates the opportunity to comment on the National Historical Records & Publications Commission's (NHPRC) 12 February 2014 draft announcements Online Publishing of Historical Records and Publishing Historical Records Online: Transition Support (the Drafts). AAUP's 133 members represent more than 90% of the nation's university presses, along with a variety of aligned mission-based publishers such as museums, learned societies, historical associations, and research institutes. Collectively, we publish more than 10,000 scholarly books and 800 journals each year. One of the hallmark of AAUP membership is a commitment to the broad dissemination of scholarship; consequently, AAUP has a long-standing policy in support of sustainable open access scholarly publishing. At the same time, AAUP members are expected by their parent institutions to meet budgets, maximize cost-recovery, and generally apply the same rigor to their activities as commercial publishers. In short, they stand with one foot in the academy and the other in the marketplace. Consequently AAUP is in a unique position to comment on several key aspects of the Drafts.

Concerns with Drafts in Their Current Form

AAUP generally applauds the goal of helping editors of *future* documentary editions to envision their projects as original digital projects (although we caution that such vision must include sustainability, and, based on the Drafts, we fear that the NHPRC may be underestimating the true complexity involved in creating fully-functional and permanently-archived digital documentary editions). We are most concerned, however, about the impact of the Drafts on existing projects, especially those long-term projects that have been consistently funded by NHPRC and that will be unable to meet the three-year completion date contemplated in the "transition" category.

For many decades university presses have worked cooperatively with editors of documentary editions to present and publish their work, and, more recently, to transform print volumes into digital formats. Aspects of the Drafts may have serious consequences for the future of these publishing relationships and the investment that university presses have been willing to make in these editions. In particular, we would draw the NHPRC's attention to the following:

(1) PDF Is a Poor Standard for Digital Research Content. University presses have made great strides in the past decade in publishing digital documentary editions. These have included both original digital projects and the migration of print volumes to robust, searchable digital editions. One of the key learnings from this accumulated experience is the overwhelming superiority of XML to PDF as a digital format. Our members' XML editions often are based on the pioneering work done for the Model Editions Partnership, which was funded by NHPRC. Unlike PDF editions, these state-of-the-art XML editions are designed to handle large databases of material and return useful results swiftly. The Drafts appear to direct projects toward creating isolated PDF editions or other inexpensive solutions. This

approach is likely to produce siloed editions that cannot be cross-searched with other materials and that may not be supported by host institutions – who often expect fully-searchable XML content – after the projects are completed. Digital research requires robust technology; ironically, for many researchers searching in print can be easier than searching PDFs.

(2) The Costs of Digital Publishing Must Be Accommodated on Permanent Basis. The Drafts contemplate immediate free digital availability of all NHPRC-funded projects, with significant exceptions provided during a transition period. Unfortunately, however, the considerable costs of digital publishing will exist beyond the transition period. These ongoing costs must be reimbursed through some mechanism – a charge to content producers, a charge to content consumers, or support from government or private sector sources (or some combination thereof). AAUP members have accumulated substantial experience experimenting with these various approaches to funding open digital access; one of the most widely used is the embargo period. Unfortunately, the Drafts effectively eliminate this mechanism, making it even more difficult to assure the sustainability of long-term NHPRC projects. (And, it should be noted, even completed projects will experience permanent and ongoing maintenance costs in a digital environment.) Without a cost recovery mechanism, many publishers will be forced to abandon the projects they have been publishing. The ensuing “domino effect” could actually lead to a result directly opposite NHPRC’s stated goal: less access to documentary editions instead of more.

(3) The Drafts Penalizes Some Non-Profit Publishers Who Use Subscription Fees to Recover Costs. By way of example, a number of documentary editors have called the University of Virginia Press’s Rotunda “the gold standard” of digital editions. Rotunda was established with private funding largely from the University of Virginia and the Andrew W. Mellon Foundation with the understanding that it would become self-sustaining through a subscription-based model. Libraries purchase the subscriptions and make the editions available freely to their patrons. Through agreement with its funders, Rotunda’s sustainability model relies on subscription fees. By withdrawing NHPRC support from projects that use subscription fees to recover costs, the Drafts penalize projects that have chosen to work with Rotunda or other similar non-profit publishing outlets, despite Rotunda’s considerable investment in the technology infrastructure to support useful, permanent digital editions.

Recommendations & Conclusion

Based on the foregoing concerns, the AAUP respectfully submits that, in order to best achieve its commendable goal of broad access to NHPRC-supported work, at least as regards the dissemination of the documentary editor’s work the Drafts could benefit from further consideration and broader stakeholder input. We therefore urge a one-year delay in the finalization of the Drafts as they relate to the publication of digital documentary editions. During this period, we encourage NHPRC to initiate dialogue within the full stakeholder community – publishers, documentary editors, historians, librarians, and others – in order to ensure its goals are met. We think it is especially important that NHPRC give further consideration to the concerns it has raised before it disrupts existing publishing relationships – a certain outcome of the Drafts in their current form.

AAUP members are interested in pursuing creative new arrangements that will open the materials they publish to as many readers as possible, and stands ready to assist the commission in any way possible in making productive use of the year delay we are recommending.

Respectfully submitted,
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The Association of American University Presses