

Statement of the Association of American University Presses

The Association of American University Presses (AAUP) appreciates the opportunity to comment on the Office of Science & Technology Policy's (OSTP) 22 February 2013 memorandum on "Increasing Access to the Results of Federally Funded Scientific Research." AAUP's 131 members represent more than 90% of the nation's university presses, along with a variety of aligned mission-based publishers such as museums, scholarly associations, and research institutes. Collectively, we publish more than 10,000 scholarly books and 800 journals each year. The hallmark of AAUP membership is a commitment to the broad dissemination of peer-reviewed scholarship; consequently, AAUP has a long-standing policy in support of sustainable Open Access scholarly publishing.

The member presses of AAUP embrace their obligation to confront the many challenges—economic, legal, and technological—to the existing system of scholarly communication that Open Access presents, and to participate with all willing partners, both within and outside the university, to strengthen and expand scholarly communications. Many of these presses, often in collaboration with research libraries, are already experimenting with new approaches, including various forms of Open Access, that seek to balance the mission of scholarly communication with its costs.

Prominent examples of our members' success in reinventing sustainable scholarly communication include: Project MUSE and the MUSE/UPCC e-book consortium; the University of Chicago Press's online edition of *The Founders' Constitution*; *The New Georgia Encyclopedia*; the brain sciences online community at MIT CogNet; Oxford Scholarship Online and Oxford's groundbreaking experiments with Open Access journals; Virginia's Rotunda; Michigan's new press and library collaboration digitalculturebooks; North Carolina's Publishing the Long Civil Rights Movement; and, the high-impact, peer-reviewed literature in theoretical and applied mathematics and statistics at Project Euclid.

Despite these successes, or indeed perhaps as a result of them, the development of sustainable Open Access models remains a work-in-progress – sometimes with profound differences across the various segments of scholarly publishing. By way of example, Science, Technology, Engineering, & Math (STEM) scholarship tends to develop rapidly, and the emerging models of sustainable Open Access publishing reflect this. Humanities & Social Sciences (HSS) scholarship, by contrast, is created and consumed in fundamentally different ways, and sustainable Open Access publishing models in HSS need the flexibility to evolve in ways that will accommodate such scholarship's substantially longer half-life. Similarly, the majority of Open Access publishing models to date have evolved in the context of journal articles; the impact of Open Access principles on the publishing of monographic-length content remains more of an unknown. Consequently, while many mission-based publishers have acquired the accumulated data and experience to project the embargo period required under certain Open Access models to recover the costs associated with the publication of a STEM journal article, similar knowledge with respect to an HSS monograph is scarce. We therefore applaud the OSTP memorandum's

call for flexibility in the development of agency guidelines—a one-size-fits-all approach to Open Access would pose existential risk to sustainable scholarly publishing.

Because of their stewardship responsibilities, mission-based publishers are uniquely attuned to the costs to be managed while exploring options for expanding Open Access. But the unavoidable truth is that under any publishing model, scholarly communication is expensive to produce, and requires—in addition to the scholar’s own work—knowledgeable editorial selection and careful vetting (through peer review and refereeing) as well as a high level of quality in copyediting, design, production, marketing, and distribution in order to achieve the excellence for which American universities have come to be praised. And it is facile to assume these costs disappear with the shift from print to electronic publication; many costs remain, and others (often the relatively least expensive) are simply replaced (often by comparatively more expensive new technologies). Universities have made substantial investments in their presses, and the staffs who run them are expert at what they do. The system of communication that these presses support plays a vital role in the spread of knowledge worldwide. We therefore note here with gratitude the OSTP memorandum’s acknowledgement of the valuable services publishers provide.

As the nature of scholarship varies by discipline and extent, so too must the application of Open Access principles. AAUP therefore urges the development of guidelines that afford mission-based publishers the flexibility they need to evolve Open Access models that will facilitate their commitment to the sustainable dissemination of knowledge. We offer our full support—including access to our members’ accumulated knowledge and experience in publishing Open Access scholarship—to the agencies responsible for developing Open Access guidelines.

Thank you for your time and consideration.