



8 February 2019

Coalition S
Science Europe
Rue de la Science, 14
1040 Brussels, Belgium

Dear members of Coalition S:

The Association of University Presses (AUPresses) is pleased to submit these comments in response to the coalition's request for feedback on its 27 November Plan S Implementation Guidance.

AUPresses is a worldwide community of university presses and aligned nonprofit scholarly publishers whose members meet strict eligibility criteria related to editorial rigor and peer review, sustained scholarly output, and commitment to mission. While our members publish across all disciplines, this community is best known for publishing scholarship in the humanities and qualitative social sciences (HSS). Although the majority of our 148 members are based in North America, we seek to further the interests of presses from 16 countries on all six continents – who collectively publish work from scholars all around the world. The Association was founded in 1937, and maintains offices in Washington, DC and New York City.

AUPresses issued its first statement in support of sustainable Open Access in 2007. Since that time, the Association and its members have engaged in a broad range of experiments and collaborations to sustainably increase access to high-quality scholarship. Individual member presses have launched over a dozen projects funded by the Andrew W. Mellon Foundation to create an infrastructure to support open digital publishing. Our community has developed a number of open access platforms, including Luminos, Collabra, and MUSEOpen. Most recently, working with our colleagues at the Association of American Universities and the Association of Research Libraries, we announced a five-year pilot program to promote institutional funding of OA monographs (TOME: Toward an Open Monograph Ecosystem). We take sustainable open access seriously.

It is our experience that, for a number of reasons, the practices and infrastructure that have evolved to facilitate open access publishing of STEM journals are not suited to the humanities, and efforts to simply mirror that regime in HSS publishing are unlikely to succeed. Key differences include:

- The majority of HSS journal publishers are nonprofits, either learned societies or university presses (or the latter on behalf of the former)
- Subscription costs for HSS journals differ by orders of magnitude from those of most STEM publications.
- The finances of most HSS journals are more fragile
- HSS journals often serve smaller communities of scholarly interest
- Funding for the research that might cover an author processing charge (APC) is overall relatively rare in these fields

These factors combine to create a landscape for HSS journals that is not analogous to that of STEM journals, making inappropriate an across-the-board porting to the former of a rubric designed for the latter. In

particular, the Implementation Guidance's ban on hybrid journals threatens to work a disproportionate hardship in the humanities and social sciences.

Because of this different landscape, the changes required to achieve compliance with Plan S cannot be identified and implemented within four years, and may in fact present long-term structural challenges in many HSS disciplines. We therefore urge the coalition to revisit the Implementation Guidance's four-year limit on Transformative Agreements, particularly as it applies to HSS journals. For Plan S to be effective in achieving its goal to open research, it must include a deep commitment to supporting HSS journals publishers in developing new sustainability models, an openness to tailored solutions instead of blanket mandates, and may require transitional financial support from the members of the coalition. Without these material efforts to alter the structures of funding for research and scholarly labors in these disciplines, it is particularly difficult to foresee the ban on hybrid journals achieving the coalition's desired results. AUPresses stands ready to marshal the substantial knowledge base of its journals community to assist the coalition in exploring these various alternatives and in identifying the right solution (or solutions) for short-form HSS scholarship.

On a more pragmatic level, we think the Implementation Guidance's mandate of a CC-BY 4.0 licenses is too restrictive. In our community's extensive experience educating scholars on the various Creative Commons alternatives, humanists demonstrate a strong tendency toward caution in their license choices. This is understandable; a humanities scholar's output is both an *idea* and an expression of that idea (rather than, say, a data set); it is completely reasonable for her to want to ensure that her scholarly argument – her expression of that idea – receives the level of protection she thinks appropriate. For this reason, TOME allows the scholar to choose any of the Creative Commons alternatives; we think this same flexibility should be available to HSS scholars under Plan S.

Finally, we note with approval remarks by Robert-Jan Smits in Berlin on 15 January to the effect that the Plan S 2020 mandate will not apply to monographs, and seek here to re-confirm the same. Moreover, when the coalition does decide to consider how to address open access in the monographs context, we hope you will engage early and often with affected stakeholders in order to identify collaborative solutions. AUPresses is prepared to assist and support your efforts at that time.

(In this vein, we particularly would draw your attention to AUPresses' *Best Practices for Peer Review* (available at http://aupresses.org/images/stories/documents/bppr_booklet_web_042016.pdf). The *Best Practices* were developed through an extensive process of research, consultation, and iteration within the community, and have been well-received by scholars and university administrators. They provide for monographs the quality assurance contemplated in the Ten Principles of Plan S.)

We thank the coalition for providing a forum for public comment. Our community has approached the idea of open access to the fruits of research with the same spirit of scholarly rigor that they expect in the work they publish—testing solutions, examining evidence, and questioning assumptions. We would welcome the opportunity to share the knowledge our community has built up and to work collaboratively with you and other stakeholders to find solutions to the challenges the Plan S Implementation Guidance poses for humanities scholarship.

Respectfully,



Peter M. Berkery, Jr.
Executive Director.