



Ecological Society of America
1990 M St, NW, Suite 700
Washington, DC 20036

December 20, 2011

Re: FR Doc. 2011-28623

Dear Madam or Sir:

As the world's largest organization of 10,000 professional ecological scientists, the Ecological Society of America (ESA) would like to provide feedback in regard to the Office of Science and Technology Policy's Request for Information on public access to scholarly publications. The Society has published ecological research in journals widely available to the public in libraries and universities for over 90 years. However, it is important to note that there is a significant difference between research results and peer-reviewed publications. Publishers such as ESA have a long record of reporting, analyzing and interpreting federally funded research. It is not appropriate for the federal government to expropriate the additional value publishers add to research results. A better course of action would be to allow publishers to continue to experiment with the best ways they can broadly disseminate materials that analyze and interpret research and to encourage federal agencies to make content they already own more visible and easier to understand.

ESA publishes four of the world's most highly cited journals in ecology and environmental science. Subscription revenue from these journals is crucial to ESA's publishing program. Without it, the Society could not continue to provide the peer-review and editorial services needed to produce high-quality scientific publications. Furthermore, subscription revenue helps to support other Society services, including scientific conferences, education programs, and the distribution of science information resources to policymakers and the public. The Society also publishes one open access journal under the author pays model. ESA's public access content includes:

- The *Bulletin of the Ecological Society of America*
- *Issues in Ecology*, a publication series presenting the scientific consensus on prominent environmental issues in language accessible to nonscientists
- A featured article in each issue of the four peer-reviewed subscription journals that ESA publishes
- All special issues of *Frontiers in Ecology and the Environment*, *Ecology*, and *Ecological Applications*
- The "Reports" section of *Ecology* and the "Communications" section of *Ecological Applications*, both of which contain concise papers on groundbreaking research
- *Ecological Archives*, which contains all appendices and supplemental material associated with papers published in the journals, including data sets, methodological and analytical detail, and computer code
- All ESA journal abstracts
- *Ecosphere*, a rapid-publication, online only, author pays, open access journal

In addition, ESA freely grants authors permission to post papers on their personal or home institution's websites. The Society also permits liberal use of ESA publications for educational purposes.

ESA continues to build its base of open content materials, but this evolving model must be allowed to develop with due care and should be orchestrated by the individual publishers. Moreover, different fields of science have different citation lives. Ecological research often examines changes that occur over long spans of time; findings frequently have a citation half-life of more than a decade. Papers published in ESA journals may therefore be just as relevant in several years as they are today, which means that any potential embargo period will do little to mitigate the financial losses that would result from full open access. Furthermore, journals in fields such as medicine and genetics, garner much of their revenue from advertising, whereas journals in other fields, such as ecology, must rely more heavily on subscriptions.

One way to make taxpayer funded research more visible and accessible to interested members of the public would be to require federally-funded grantees to provide a second version of the research summaries they already prepare, specifically for the lay reader. To aid in online searches, these summaries could also include the source of federal funding institutions and grant numbers. Publishers could also include grant information in paper abstracts which are usually available without a subscription.

Government mandates for publishers to make their work available online without compensation will endanger the U.S. scholarly publishing system. ESA respectfully requests that the Administration allow the scientific publishing community to continue to explore workable solutions that meet the dual goals of the scientific enterprise as well as provide resources to interested members of the public.

Thank you for your consideration,

A handwritten signature in dark ink, reading "Katherine S. McCarter" with a long horizontal flourish extending to the right.

Katherine S. McCarter
Executive Director and Publisher