



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

January 21, 2010

Office of Science and Technology Policy
725 17th Street, NW
Washington, DC 20502

The Ecological Society of America (ESA) is the nation's premier society of professional ecologists. In keeping with its goal of promoting the science of ecology, the Society has, since 1920, published ecological research in journals widely available to the public in libraries and universities. ESA shares the Administration's commitment to a scientifically informed public but cautions that US Public Access policy be crafted carefully so that it will not have a devastating impact on the efforts of scientific societies and nonprofit publishers to sustain scientific research and knowledge dissemination.

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.

ESA already offers a great deal of open access content:

- The *Bulletin of the Ecological Society of America*
- *Issues in Ecology*, a publication series presenting the scientific consensus on prominent environmental issues
- A featured article in each issue of the four peer-reviewed 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.

In addition, ESA 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 maintains that full open-access publishing would not generate the revenue necessary to maintain the high quality for which its publications are renowned. Full open access would provide little incentive for libraries and individuals to continue their subscriptions. The author-pays model, the most commonly cited alternative to subscriptions, has not been shown to cover the costs of publication at a price that is acceptable to authors. Further, this model greatly disadvantages students and other researchers without large grants, including those from less wealthy institutions and nations.

The public access policy of the National Institutes of Health requires that research findings be made available to the public within 12 months of publication. This policy is well suited to fields such as medicine and genetics, wherein the relevance of research declines rapidly with time and publications have a relatively short "half-life." In contrast, 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 be just as relevant in several years as they are today, which means that a 12-month delay will do little to mitigate the financial losses that would result from full open access. Furthermore, for journals in fields such as medicine and genetics, much of the revenue comes from advertising, whereas journals in other fields, such as ecology must rely more heavily on subscriptions.

While duly acknowledging the benefits of public access to research findings, ESA urges the Administration to consider open access in terms of its impact on the overall publication process. Robust, peer-reviewed research publications are central to maintaining America's leadership in the sciences, and they are critical tools for policymakers, academics, business leaders, and other stakeholders addressing many of today's most pressing challenges. The public would be ill-served by a policy that impairs the ability of nonprofit scientific societies to publish high-quality journals.

Sincerely,

A handwritten signature in cursive script that reads "Katherine S. McCarter".

Katherine S. McCarter
Executive Director and Publisher