

Society of Architectural Historians

January 17, 2012

MEMO

TO: Office of Science and Technology Policy on behalf of the National Science and Technology Council Task Force on Public Access to Scholarly Publications

Via electronic mail: publicaccess@ostp.gov

FR: Society of Architectural Historians

RE: Response to November 3, 2011 OSTP RFI on Public Access to Scholarly Publications from Society of Architectural Historians

We are pleased to submit the comments of the Society of Architectural Historians (SAH) in response to the Request for Information (RFI) issued by the Office of Science and Technology Policy (OSTP) on behalf of the National Science and Technology Council Task Force on Public Access to Scholarly Publications, published in the *Federal Register*, November 3, 2011. We request that these comments in response to the RFI announced at 76FR68518 be made an official part of the rulemaking docket.

Founded in 1940, SAH is the primary professional society for architectural historians worldwide. With more than 3,000 individual members and 1,000 library and institutional members, SAH's members are a diverse group of professionals who work with the built environment in a variety of ways as university professors, students, preservationists, architects, museum curators, writers, professional guides, and other related fields. SAH produces the print journal of record for the field, *Journal of the Society of Architectural Historians (JSAH)*, and has created an online resource designed to disseminate new research worldwide, namely *JSAH online*, one of the first multimedia scholarly journals in the humanities. SAH funded the development of this online resource with more than \$1 million in grants from the Andrew W. Mellon Foundation and relies on revenue from membership dues and institutional subscriptions to pay for its ongoing editorial and technology expenses. Over the years, SAH itself has invested more than an equal amount to support excellence in publishing both print and online publications.

Section 103(b)(6) of the America COMPETES Reauthorization Act of 2010 requires that interested individuals and organizations provide recommendations on approaches for ensuring long-term stewardship and broad public access to the peer reviewed scholarly publications that result from federal funding. We write today to make the case that while we support the goal of wide dissemination of scholarly research, access to such information currently exists, and no federal government intervention is currently necessary. SAH knows of no research that demonstrates a lack of access within the existing system for making the content of scholarly journal content available to all who might benefit from it.

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With regard to the questions put forward by OSTP at 76R68518, we disagree with the underlying assumption that the federal government has the legal right to mandate public access to scholarly journal articles which result from federally funded research. We acknowledge that while the government might have a right to the unfinished work product such as the research data or findings of researchers to whom they provide financial support, it does not have the right to journal articles that are the cumulative result of the significant time and financial investment of peer reviewers, editors, copyeditors, graphic designers, programmers, proofreaders, technology providers, publishers and distributors of such journal content—none of which is supported by federal research dollars.

Mandating open access to such published material without just compensation and lawful procedural limitations constitutes an illegal appropriation of copyrighted material without fair compensation. While many assert that the mandate is directed only at journal publishing in the STEM fields, thus far there appears to be no such distinction between the STEM fields and the humanities in much of the discussion surrounding mandated open access. Discussions surrounding the topic of open access within OSTP and federal agencies have assumed that whatever regulations or guidance emerges from this process will be equally applicable to all federal funding agencies and the research they fund across all academic disciplines. Nothing could be farther from the truth.

Journal publishing in the humanities is very different than publishing in the STEM fields. Given the rapid pace of scientific discovery, after twelve months, much of the content in many STEM journals has already been surpassed by new research. As a result, an embargo period of twelve months often has little effect on the financial models upon which publishing in STEM fields is based. In the humanities, such as architectural history, literature, philosophy, however, well over 90 percent of downloads occur after twelve months from the date of publication. As a result, the cited half-life of quarterly journals in the humanities is well beyond ten years. A twelve-month embargo period does nothing to help protect subscription revenue or the business models that enables the Society of Architectural Historians or any publisher to continue producing the publications. If SAH were to lose revenue from library subscriptions, we would no longer be able to publish the journal of record for the field of architectural history.

We thank you for the opportunity to submit these comments, and hope you will understand our need to preserve the business model that enables us to disseminate scholarly research worldwide.

Pauline Saliga
Executive Director
Society of Architectural Historians

