



Association for the Sciences of Limnology and Oceanography

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Honorable Larry Bucshon
Chairman, Research Subcommittee
Science, Space and Technology Committee
U.S. House of Representatives
1005 Longworth House Office Building
Washington, DC 20515

Dear Dr. Bucshon:

We commend your committee's leadership in ensuring a vigorous and competitive scientific enterprise in the United States through the FIRST Act. We appreciate the opportunity to comment on the Discussion Draft of the bill.

Our comments focus on Section 302, "Public Access to Research Articles and Data" and the ramifications of open access publishing on the future of professional scientific societies, such as our own. Our society is the largest professional organization for the aquatic sciences, with more than 4,500 members worldwide. Our society was founded in 1948 and our flagship journal *Limnology and Oceanography* was launched in 1956. Our journal portfolio has since expanded to four titles.

In the aquatic sciences, most journals were published by science societies in the mid-20th century. Traditionally, publication has been the core economic activity of societies such as ASLO. Society members serve as journal editors, associate editors, and peer reviewers, ensuring the scientific integrity of the society's publications. Subscription pricing set by the societies is usually a fraction of for-profit publishers. Societies give back those revenues to science via essential value-added services such as scholarly meetings, early-career support and mentoring, science discourse and professional networking, promoting enhanced diversity in STEM fields, sponsoring career-advancing honors and awards, engaging in public outreach, and providing independent educational resources. In ASLO, 70% of the cost of these essential science services derives from journal subscription revenue.

Section 302 of FIRST provides a flexible process for providing public access to research while limiting the unintended consequences to the U.S. scientific enterprise. It requires a transparent process for soliciting views of stakeholders in developing policies, procedures, and standards. Careful, broad stakeholder comment is necessary to provide for an open access policy that maximizes benefits and minimizes harm.

Importantly, FIRST provides for an embargo period of 24 months, with a process for extending the period outlined in the legislation. *The length of the embargo period is critical for science societies.* Short embargo periods would drastically reduce subscription revenue to societies. While the half-life of



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literature in certain biomedical fields is relatively short, it is significantly longer in our fields. The 50 aquatic science journals cited most frequently in 2012 had an average citation half life of 7.78 years. The 24-month embargo period is more realistic for many disciplines of science than the 12 months often discussed. The longer embargo period will go a long way to ensure journal viability and thus society financial health for small society publishers like us. This will allow science societies to continue to reinvest those excess revenues in the science enterprise and the education of the next generation of US STEM workers.

We believe the flexibility provided through the proposed procedures will be key to achieving a fine balance between benefits and financial risks that could undermine a critical segment of the scientific infrastructure.

Thank you for considering these comments. Should you have questions, do not hesitate to contact us.

A handwritten signature in blue ink, appearing to read 'John A. Downing', is written over a faint, light blue circular stamp or watermark.

John A. Downing
ASLO President

JAD/sr