May 12, 2014

The Honorable Lamar Smith
Chairman, Committee on Science, Space, and Technology
U.S. House of Representatives
2321 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Smith:

On behalf of the Entomological Society of America (ESA), I’d like to take this opportunity to comment on the FIRST Act of 2014 (H.R. 4186) prior to full committee consideration of the bill. ESA, of course, strongly supports robust and increased funding for the National Science Foundation and other federal agencies that are critical parts of the scientific enterprise. We hope the final FIRST Act will be amended to reflect the guiding principles outlined in the Coalition for National Science Funding’s (CNSF) letter to you dated March 12, 2014.

Additionally, ESA would like to thank you for proposing a 24-month embargo period for scholarly publications in Section 303 of the bill, which covers “Public Access to Research Articles and Data.” As you know, proposed policies thus far have suggested a 12-month embargo period and there are many potential unintended consequences to America’s professional scientific societies that may result from those policies.

A significant fraction of the scientific literature is published by not-for-profit science and mathematics professional societies, like ESA. Publications represent an important core activity of those societies and their pricing is at a fraction of that of for-profit publishers. Societies also give back net revenues to science via essential value-added services, such as career development, support for student participation, professional networking, awards and recognition for scientific achievement, leadership development, and other related activities. As such, scientific societies have a special place in maintaining a vigorous scientific enterprise. Societies reinvest publication revenues in the science, the scientific workplace, and the scientific workforce of the future. Open access to publications impacts the health of scientific societies as well as the research grants which foster innovation.

Our society, the Entomological Society of America, is the largest organization in the world serving the professional and scientific needs of entomologists and individuals in related disciplines. Founded in 1889, ESA has more than 6,500 members. We publish six journals and publications constitute approximately half of our budget.

As mentioned above, ESA is supportive of the 24-month embargo period for covered material outlined in Section 303 of the FIRST Act. The 24-month period is much more realistic than a 12-month embargo period that is often discussed. A 24-month embargo period will go a long way to ensure journal viability and, thus, scientific societies’ financial health. ESA would like to thank you, again, for including this vital provision and we hope it will be included in the final bill.

Thank you for considering these comments. Please do not hesitate to contact ESA if you have any questions.

Sincerely,

Frank Zalom

President, Entomological Society of America
Professor of Entomology, University of California, Davis