December 20, 2013

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 discussion draft of the FIRST Act of 2013. 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 bill will reflect the guiding principles outlined in the Coalition for National Science Funding’s (CNSF) letter to you dated December 20, 2013.

Additionally, ESA would like to thank you for proposing a 24-month embargo period for scholarly publications in Section 302 of the draft 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 302 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 in the discussion draft and we hope it will be included in any 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
December 20, 2013

The Honorable Jay Rockefeller
Chairman, Committee on Commerce, Science, and Transportation
531 Senate Hart Office Building
Washington, D.C. 20510

The Honorable John Thune
Ranking Member, Committee on Commerce, Science, and Transportation
511 Senate Dirksen Office Building
Washington, D.C. 20510

Dear Chairman Rockefeller and Ranking Member Thune:

On behalf of the Entomological Society of America (ESA), I’d like to draw your attention to the discussion draft of the House Committee on Science, Space, and Technology’s FIRST Act of 2013. Like most in the scientific community, we are concerned with many of the provisions and the overarching themes of this 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. ESA hopes the Senate COMPETES bill will reflect the guiding principles outlined in the Coalition for National Science Funding’s (CNSF) recent letter to Chairman Lamar Smith dated December 20.

However, ESA would like to draw your attention to the potential unintended consequences to America’s professional scientific societies that may result from proposed policies related to open access to scholarly publications. While many proposed policies have suggested a 12-month embargo period, the FIRST Act’s Section 302, which covers “Public Access to Research Articles and Data,” calls for a 24-month embargo period, of which ESA is supportive.

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As mentioned above, ESA is supportive of the 24-month embargo period for covered material outlined in Section 302 of the FIRST Act, which 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 asks that as you work toward the Senate version of America COMPETES, you will consider incorporating a similar embargo provision as it relates to open access to publications.

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