



**Botanical Society of America**  
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[www.Botany.org](http://www.Botany.org)  
[www.AmJBOT.org](http://www.AmJBOT.org)  
[www.BotanyConference.org](http://www.BotanyConference.org)  
[www.PlantingScience.org](http://www.PlantingScience.org)  
[www.PlantIT.org](http://www.PlantIT.org)

January 21, 2010

Office of Science and Technology Policy  
Attn: Open Government Recommendations  
725 17th Street, NW  
Washington, DC 20502

Via Email to: [publicaccess@ostp.gov](mailto:publicaccess@ostp.gov)

Dear Colleagues:

I write as President of the Botanical Society of America, a non-profit scientific society with nearly 3300 members worldwide, and I am pleased to respond to your 9 December 2009 request for public comments on Public Access Policies for Science and Technology Funding Agencies Across the Federal Government.

The BSA, founded in 1893, supports and disseminates botanical research through the *American Journal of Botany*, our newsletter the *Plant Science Bulletin*, and annual scientific meetings. In publishing the journal, we also help to support the development of plant scientists, both in the United States of America and abroad. Both the wide dissemination of research and the professional development of scientists are vital to our mission as a not-for-profit scientific society dedicated to ensuring the health of plant science. These are values we share with many other not-for-profit scientific societies.

As a non-profit scientific society publisher, we are committed to sharing research as broadly as possible. Our research is currently free to scientists from all developing nations through programs sponsored by the World Health Organization and the United Nations: Access to Global Online Research in Agriculture (AGORA); the Access to Research Initiative (HINARI); and Online Access to Research in the Environment (OARE). All articles published in the *American Journal of Botany* are freely accessible through our web site ([www.amjbot.org](http://www.amjbot.org)) 12 months after publication. Authors and funding agencies can also provide access to papers accepted for publication as soon as they are available for online publication by paying a modest fee. Our policies also ensure that authors can distribute their published papers and use them freely in teaching without additional charge.

To make these things possible, the Botanical Society of America has invested heavily in electronic systems producing digital versions of the *American Journal of Botany*. These processes have significantly improved the time from submission of research to the date of publication. Access to research published in the *American Journal of Botany* via the HighWire Press platform is considered the top of the industry.

*The Botanical Society of America is a scientific and educational organization devoted to the fundamental study of the form, function, diversity, evolution and uses of plants and their interactions within the biosphere.*

A federal mandate that required immediate open access to papers published in the *American Journal of Botany* would damage our ability to publish the highest quality research in plant science. Even a mandate that required open access after 6 months poses significant risks to us and to many other non-profit scientific society publishers. Such mandates would require invention of entirely new models of scientific publishing if the results of scientific research are to be made widely available in easily searchable forms that ensure long-term archival access. Professional librarians recognize that non-profit scientific society publishers publish excellent journals at relatively low cost, make the contents of those journals freely available after periods that allow them to recoup their expenses, and foster the development of new generations of scientists. A federal mandate requiring open access to published articles less than 12 months after they have appeared threatens those valuable contributions, unless such mandates are accompanied by significant new federal funding to agencies funding scientific research.

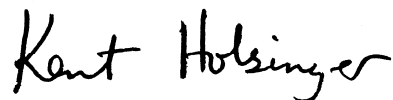
While there is much to recommend the public archiving model adopted by the National Institutes of Health, it may not be appropriate for other fields of scientific research. A model that works well for biomedical science may not work well for physics, chemistry, mathematics, engineering, or environmental biology. Each of these fields has different traditions, different professional society organizations, and different publishing models. A single model will not serve them all.

The *American Journal of Botany* does not charge authors for publication. Although authors have the option of paying a fee allowing immediate access, it is rarely used. Both the funding of botanical research and the immediacy of its results are very different from those of biomedical fields. Many prominent scientists pursue significant parts of their research without the benefit of federal funding, and those who do receive federal funding typically receive smaller awards than our colleagues in biomedical fields. Moreover, research findings in plant sciences are often referred to for several decades after first being reported, and new advances rarely depend on access to results published in the last six months. Assuming that a publishing model appropriate for biomedical research also applies to research in the plant sciences would undermine our ability to disseminate the results of botanical research and to support the training of new scientists.

On behalf of the Botanical Society of America, I am pleased to endorse your efforts to ensure the broadest possible access to the results of scientific research. The Botanical Society of America and many of our non-profit scientific society colleagues have already adopted policies designed to further that goal. We look forward to working with you and your colleagues in various federal science-funding agencies as you develop policies intended to consolidate these advances.

Thank you for your time and consideration.

Sincerely yours,

A handwritten signature in black ink that reads "Kent Holsinger". The signature is written in a cursive, flowing style.

Kent E. Holsinger, President  
Botanical Society of America