



February 8, 2019

To:  
cOAlition S  
Science Europe AISBL  
Rue de la Science, 14  
1040 Brussels, Belgium

From:  
Susan King, PhD  
Executive Director  
Rockefeller University Press  
950 Third Avenue, Floor 2  
New York, NY 10022

**Subject: Public Feedback on the Guidance on the Implementation of Plan S**

Rockefeller University Press (RUP) welcomes the opportunity to respond to the cOAlition S consultation on Plan S. RUP publishes the *Journal of Cell Biology (JCB)*, *Journal of Experimental Medicine (JEM)*, and *Journal of General Physiology (JGP)* and co-publishes *Life Science Alliance (LSA)*. RUP's nonprofit journals were established by the research community, and editorial decisions and policies continue to be driven by scientists who actively contribute to their fields, appreciate the value of peer review, and desire a better publication experience for all. RUP is a department of The Rockefeller University, and it is reflective of the university's commitment to high-quality research to improve the understanding of life for the benefit of humanity.

RUP is committed to quality and integrity in scientific publishing. Our goal is to publish excellent science using the latest technologies. In collaboration with academic editors based at leading institutions, we carry out rigorous peer review, applying the highest standards of novelty, mechanistic insight, data integrity, and general interest. For JCB, JEM and LSA, editorial decisions on research manuscripts are made through collaborative consultation between in-house professional scientific editors and research-active academic editors. The final decision on submissions rests with our academic editors at each of our journals. All digital images are examined before publication for evidence of inappropriate manipulation. This rigorous evaluation represents a significant investment in time, effort, and cost. Author fees alone do not cover the costs of a quality editorial process and publication experience. RUP is heavily reliant on subscription revenues to cover its cost of operations.

Researchers and clinicians access *JCB*, *JEM*, and *JGP* through institutional subscriptions. Content such as editorials and certain columns are made immediately free upon publication, and all articles are free to read no later than six months after publication, including our entire archive of content that dates back to 1896. Launched in

2018 with alliance partners EMBO Press and Cold Spring Harbor Laboratory Press, *LSA* is an Open Access journal.

While we applaud the goal of Plan S to increase access to research, we find the stipulations of the document incongruent with our current practices in support of Open Access and the sustainability of our operations.

RUP's long-standing philosophy supports federal mandates aimed at making the results of federally funded research available to the public, which is reflected in the steps RUP began to take even before the [Budapest Open Access Initiative](#) and the [Berlin Declaration on Open Access to Knowledge in the Sciences and Humanities](#) were published:

- Since 2001, all research content in *JCB*, *JEM*, and *JGP* has been made available free after six months, including the entire archive of articles dating back to volume 1, issue 1.
- Since 2008, authors have retained copyright and are free to distribute their accepted manuscript or the article in the form and format as published by RUP as the author sees fit.
- Since 2017, authors can opt for Gold Open Access with a CC-BY license.
- All RUP content is deposited to PubMed Central (PMC) (and included in PMC's [Open Access subset](#)) and Europe PMC as well as CLOCKSS, LOCKSS, and Portico to ensure perpetual access and long-term digital preservation.
- Full text is available in machine-readable format (e.g., XML) for seamless text and data mining (TDM).
- RUP journals use DOIs as permanent identifiers, require ORCID identifiers for corresponding authors, and encourage ORCID iDs for all authors.
- All metadata, including open references, abstracts, and funding data, are deposited to Crossref immediately upon publication of the article.
- Since 2017, we have made public our long-standing policy of allowing the posting of manuscripts to a community preprint server by authors.
- We have long allowed and assist with transfer of rejected articles along with reviewer comments to other journals at the authors' discretion.
- Inability to pay an article processing charge (APC) does not affect the publication of a manuscript.

- Low-income countries receive free access. RUP is a longtime advocate of the Research4Life initiative, which provides developing countries with free access to peer-reviewed content through programs including Hinari: Research for Health, established by the World Health Organization.
- Last year, we launched *Life Science Alliance (LSA)*, an open-access, peer-reviewed journal, as part of an alliance of EMBO Press, Rockefeller University Press, and Cold Spring Harbor Laboratory Press, again recognizing Open Access as the direction of travel for scholarly publishing. All content published in *LSA* is under a CC-BY license. *LSA* is included in the Directory of Open Access Journals (DOAJ).

We feel that the above description of our current program and activities demonstrates that RUP strives to serve the academic community, facilitating wide distribution of published content while still maintaining financial sustainability. We do not accept the premise that “*There is no valid reason to maintain any kind of subscription-based business model for scientific publishing in the digital world.*” Subscription revenues support editorial rigor and technical innovation at RUP.

The integrity, value, and innovation we bring to the publication process does not come without costs. cOAlition S has not made public what it considers “reasonable” APCs to cover the costs of rigorous evaluation, publication, and long-term digital preservation.

While the goals of Plan S on the surface seem to be aimed at large, wealthy commercial publishers, the first victims will surely be smaller publishers without deep pockets and tremendous volume. Plan S accepts a carve-out for “transformative” deals, including the “read and publish” model, which have almost exclusively to date been between countries and large for-profit companies. No such exception exists to support hybrid journals published by societies and university presses.

RUP supports authors’ freedom to choose where to publish their research findings, regardless of business model. Plan S as currently described impairs authors’ freedom to choose where to publish.

We thank cOAlition S for the opportunity to respond about Plan S. Our answers to the specific questions follow.

Sincerely,



Susan King, PhD  
Executive Director  
Rockefeller University Press

**1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?**

The additional cost to the scholarly ecosystem in the development and running of Open Access repositories that meet all the requirements set forth in the guidance document.

The additional administrative burden on authors and/or universities to meet the requirement that authors deposit the final published version of a scholarly publication (Version of Record [VoR]) or an accepted manuscript in a Plan S–compliant repository.

The specific timeline for implementation of Plan S by the various member organizations remains to be defined and may vary by organization, adding to the complexity of implementation.

The negative impact of Plan S in its current form on society and non-profit journals [as noted by Marcia McNutt](#), president of the National Academy of Sciences of the United States.

**2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?**

Refocus Plan S from increasing the proportion of Gold OA journals (which is ultimately an irrelevant measure) to increasing the proportion of OA articles [as noted by Bernd Pulverer](#), PhD, Chief Editor, The EMBO Journal and Head of Scientific Publications at EMBO.

Develop a carve-out to support hybrid journals published by societies and university presses without instituting caps on article processing charges (APCs). This is certainly reasonable since Plan S accepts a carve-out for “transformative” deals, including the “read and publish” model, which have almost exclusively to date been between countries and large for-profit companies. [As proposed by Michael Clarke](#), if Plan S can provide a carve-out for the “transformative” deals of commercial publishers, it could similarly provide one for societies and university presses.