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As a not-for-profit university press and journal publisher of more than 80 scholarly journals that cover a wide range of disciplines, from the humanities and the social sciences to the life and physical sciences, the University of Chicago Press is concerned about the implementation and effects of Plan S.

Plan S, as it is currently drafted, does not take account of the diversity of the scholarly journal publishing ecosystem. And, the consequences---including unintended consequences---are not fully understood by all who could be affected. The University of Chicago Press publishes on behalf of learned and professional societies and associations, foundations, museums, and other not-for-profit organizations. Plan S is not drafted with these publishing partners in mind. It claims a scope of “all scholarly output,” including humanities and social science journals. However, it is clearly conceived for and directed at STEM journals and large commercial publishers. We argue Plan S applies STEM-journal-compliance standards to humanities and social science journals in a way that is unworkable and destructive, and it does not sufficiently recognize the differences or complexities of these publishing communities.

The requirements for Plan S journal compliance are applied to publishing organizations regardless of size or mission. Some of the guidelines for implementation are unworkable for publishers who operate in a competitive market, even as not-for-profit organizations. It is impractical to ask that direct and indirect costs be posted for a Plan-S compliant journal. Prices for services negotiated between third-party vendors and publishers cannot be revealed without the potential for fixing prices or the market among these vendors. It is unclear how standardization or caps could be feasible among publishing operations of different sizes and between commercial and not-for-profit models. Indeed, price caps will favor the largest commercial publishers, which have the greatest resources and economies of scale, and drive out others. Also, the accelerated timeline is mismatched with the significant business changes it requires.

The requirement to make the articles available under a CC BY license allows for reuse that falls outside the bounds of acceptable practice for many humanities and social science disciplines. For example, for art and art history journals, authors will find it difficult and in many instances impossible to obtain permission to make third-party artwork freely available under a CC BY license.

We look forward to the results of the commenting period. It is our hope that the concerns and priorities shared during the period will reflect the diversity of stakeholders in scholarly publishing. We strongly encourage cOAlition S to listen to scholars, societies, and non-profit publishers working across disciplines, and if they are not well represented in the comment period, we hope they will be engaged in discussion.

Respectfully,  
The University of Chicago Press