



Feedback to cOAlition S  
Guidance on the Implementation of Plan S

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February 8, 2019

ASME International

With over 100,000 members, ASME International is the largest mechanical engineering professional organization in the world. Since its founding in 1880, ASME has worked to advance public safety and the quality of life throughout the world. ASME's reputation as a "neutral convener" has been earned over these many decades by its deliberate embrace of all stakeholders in the consensus process and in facilitating a robust technical peer review process built on integrity and honesty.

ASME's mission is to serve diverse global communities by advancing, disseminating and applying engineering knowledge for improving the quality of life; and communicating the excitement of engineering. As a charitable organization, we have balanced our mission with reasonable economic models in order to become an essential resource for mechanical engineers and other technical professionals throughout the world for solutions that benefit mankind. Throughout our long history, we have deliberately maintained affordable publications, conferences, standards, workshops, and seminars.

ASME publishes 31 technical journals periodically highlighting the latest engineering research. Our organization annually publishes approximately 3,500 journal articles each year, authored by over 9,000 authors and researchers, all of which are reviewed by some 7,500 subject matter expert editors and reviewers. ASME journals offer the highest quality peer-reviewed literature in their respective field of mechanical engineering. In terms of conferences proceedings, ASME publishes some 8,000 papers annually, representing the work of some 20,000 authors and the involvement of some 15,000 subject matter expert organizers and reviewers. ASME sponsors scientific meetings and conferences providing opportunities for professional engineers to present groundbreaking research and to participate in the exchange of information. We invest in future engineers by providing professional development opportunities, including education, training and mentoring programs.

ASME has a strong record of maintaining a rigorous and high-quality peer review of our journals. We endorse the dissemination of the results of all peer-reviewed research, but it must be done in a manner that is sustainable for scholarly publishers. It is critical to protect the authors' rights to their intellectual property to ensure copyrighted materials are protected from unauthorized dissemination and piracy. Our organization has invested in technologies and innovations that enable high-quality digital peer review, production, distributions, interoperability and discovery of the latest scientific and scholarly works.

Plan S

We appreciate the opportunity to express our concerns and opposition to Plan S, which would require scientific publications to report the results of publicly funded research in compliant open-access journals or on open-access platforms after January 1, 2020.

Specifically, we would like to address question 1: Is there anything unclear or are there any issues that have not been addressed by the guidance document?

- First and foremost, Plan S was developed and announced without input or buy-in from key stakeholders in the scholarly publishing community.
- Plan S does not recognize the value of scholarly publishers and the services that we provide to researchers and authors in creating and disseminating journal articles, as well as the wide variety of business models that we employ in order to provide the important services that are outlined above.
- Plan S did not provide opportunities for comments or conduct impact assessments. There was no acknowledgement or resolution of stakeholder concerns before developing the regulatory principles and guidance of Plan S.
- Elements of Plan S - such as undermining copyright law, picking winners and losers between business models, and proposing price controls - would undercut sound economic principles that have enabled innovation, diversity, and growth in scholarly publishing for decades. Rather than mandate business models and de-incentivize market efficiencies, a more effective approach would be to incentivize the continued growth and vitality of the scholarly communication market for the benefit of the scholarly community.
- Plan S, as outlined in the Guidance, would not only harm the collaborative process that scholarly publishers and international researchers and authors have worked so hard to achieve, but it would diminish the quality and value of published scholarly research by preventing researchers from publishing in the journals of their choice.
- Plan S poses a significant threat to professional and scholarly societies and the researchers and authors we support.

Open access policies should be sustainable and designed to promote innovation and diversity in scholarly publishing. Furthermore, open access policies should be carefully crafted to avoid unintended consequences that would harm the dissemination of knowledge by reducing the quality and distribution of scholarly articles.

We urge cOAlition S, as well as the Plan S signatories, to consult with scholarly professional societies to conduct a comprehensive review of the implications of Plan S on various public access models, as well as the impact to the peer review process, copyright and intellectual property protections and the health of the research and innovation ecosystem.

Sincerely,



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