

Initial comments by Jean-Claude Guédon, Professor, Department of comparative literature, Université de Montréal, followed by further remarks about the draft policy.

As a former v-p (dissemination of research) of the Federation, I approached this report with great interest. My general comments are the following:

1. It is regrettable that this report did not mention that, while I was v-p, I tried to convince the university presses to place in open access all the monographs that had been subsidized by ASPP ***and*** that were out of print. The reaction of the presses was extremely negative, with the notable exception of Antoine del Busso who managed to offer a few subsidized titles from Fides. He could not offer titles from my own university because of agreements previously taken with eBrary, a situation that seems to have been shared by a number of other presses. In fact, the director of McGill-Queens Press, Mr. Cercone, even went so far as to tell me that, with digitization, the concept of "out-of-print" book was obsolete. However, the same presses never revealed how many of these old, subsidized publications were sold, and what kind of revenue it provided to the university presses.

Mentioning the first experience of the Federation in this regard would have revealed the politically charged context of this issue. Clearly, the Federation did not want to antagonize the presses, given that one of its main mandates has long been to manage the ASPP funding stemming from SSHRC (I believe this arrangement started when the two federations (humanities and SS) merged as a way to support the new Federation financially and to unload the burden of this programme from SSHRC). However, this arrangement has also placed the Federation in an awkward position with regard to the university presses. And I believe that the opposition of university presses to open access remains strong.

In my opinion, the Federation ought to go back to the origins of university presses and see how they have drifted ever further away from the original goals of such organizations when Johns Hopkins University Press was founded in the US (see Colin Steele's article on this topic: <http://quod.lib.umich.edu/jjep/3336451.0011.201?view=text;rgn=main>).

2. The survey of this report is quite good, but a few points would have deserved being made:

a. Athabasca university is only mentioned in passing and only once. It is placed in the context of open access publishing for both journals and books, which is not false, but it hides the fact that Athabasca has been carrying on a courageous experiment in monograph publishing for several years. It is surprising to see that so little is said about it. Some evaluation of the successes and possible failures of this pioneer work should have been undertaken, especially since it is an indigenous experiment. PUM in Montreal is poised to begin its own experiment, but, clearly, Athabasca should have been studied much more closely.

b. It would have been interesting to compare Athabasca to other presses that have adopted open access. In particular, I found no reference to the national University in Canberra and its press. The following URL will give some basic information about its OA programme: <http://aoasg.org.au/oa-monographs-developments/>. Besides monographs, ANU also deals with textbooks which is quite interesting. Given the financial straits in which our students find themselves, this would have been an interesting angle to approach as well.

c. Latin America is represented by Scielo, but other initiatives should have been mentioned as well. Redalyc in Mexico is another important player, particularly in the disciplines covered by the Federation. Clacso, in Argentina, publishes open access monographs. The person to query there is my good friend Dominique Babini (babini@clacso.edu.ar). The following site mentions the presence of over 800 titles available in open access: http://www.clacso.org.ar/libreria-latinoamericana/inicio.php?orden=nro_orden.

d. In the US, several presses have made experiments with open access, particularly the National Academies.

I saw no references to such experiments. Why?

d. The OAPEN experiment, originally funded by the European Commission, should have been studied more closely. Was Eelco Ferwerda interviewed at all? He is a key player in this area. What is said in the report is not very informative. The same is even truer of OASPA which is simply mentioned.

3. The report should have carefully distinguished green and gold publishing. It should also have carefully separated HSS publishing from STM publishing. In short, it presents an overview of open access based on countries, and it does so in a somewhat superficial manner.

4. Who were the people interviewed for this report? Three Canadians were original signatories of the BOAI in 2002: Stevan Harnad, Leslie Chan and myself. I attended and signed the Berlin declaration. I was at Bethesda and at Salvador de Bahia. In stating this, I am not trying to push myself, but my case may serve to underscore all the missed opportunities.

In conclusion, I do hope the Federation is going to address the issue of OA monographs really seriously. The report provides a high-altitude survey that displays little sensitivity to the particular challenges of HSS monograph publishing. I place myself at its disposal if, in its wisdom, it should consider that I could be useful.

Addendum – comments on the draft policy.

1. The two basic principles on which the draft policy is based are both very good. The fact that it makes reference to a “dynamic Canadian scholarly publishing sector” is interesting in that the set of actors alluded to in this phrasing does not necessarily coincide with university presses. Publishing developments involving libraries, or alliances between libraries and university presses are probably in the background of this generic expression. It can also be noted that “publishing sector” is to be preferred to “publishing industry”, given that the later term connotes commercial perspectives.

2. The effects of Open Access on scholarly publishing seems to be narrowly conceived in terms of “sales” which is precisely the kind of point of view that should be left behind as much as possible. Scholarly publishing, be it journals or books, exists to support the “Great Conversation”¹ of science and the production of knowledge, not to support a particular cast of actors (publishers) and their revenues. Colin Steele, in the article noted above, in the first part, is very useful on this point.

3. Preliminary consultations with university presses could not have given any other result beside the dire prediction of “serious and unpredictable effect on Canadian Scholarly Publishing”. May I remind the reader of these lines that stepping outside of one’s house may have serious and unpredictable effects on one’s health! This is the classic “FUD” strategy whereby Fear, Uncertainty, and Doubt are marshalled to attempt blocking an important innovation that cannot be controlled from within.

4. I regret the limitation to “incentivize”. Open Access should be mandated because it involves public funds, and the public should have access to the literature it funds. Moreover, the public is more important than a handful of university presses.

5. The claims made under “developing a draft policy”: I am struck, on the contrary, by all the lacunae that seem to characterize the appendix (see above).

6. Details of the draft policy:

1 Jean-Claude Guédon, “Sustaining the Great Conversation”: The Future of Scientific and Scholarly Journals” in *The Future of the Academic Journal*, Bill Cope and Angus Phillips, eds. (New York, Chandos Publishing, 2014), 2nd ed., pp. 85-112.

- a) **Open Access should be mandatory;**
- b) **Open Access is impossible if not digital. What is “digital publishing” is not adequately treated in the documents presented here. It certainly is a good deal more than a simple pdf in the web. Antoine Del Busso says a number of essential things in this regard;**
- c) **Publishing a book, for a scholar, especially a young scholar, corresponds to two objectives: make one's research as widely available as possible, and manage one's career. If ASPP-supported works are in Open Access, and, therefore, published in electronic format, the cost of publishing, distributing, and storing will go down. This means that present subsidies would cover the e-publishing of works;**
- d) **The incentive strategy is awkward and, in the light of what was said in (c), probably not needed;**
- e) **In some circles, such a form of publishing may yet look second-rate by virtue of not being in paper format. This option, therefore, requires that the peer review process be done very transparently and rigorously; it also requires a commitment on the part of Canadian universities aiming at taking such works seriously and fairly in the processes leading to tenure and promotion. The same should be true of SHHRC juries in evaluating grant submissions. What such juries and peer evaluations should be concerned with is quality, high quality in fact, and not the medium. Is a book better because it is hardbound? Is it worse, because it is digital?**
- f) **The incentive tied to an embargo limited to 12 months demonstrates the awkwardness of the proposed policy. Why 12 months? Why not 6? or 3? Why not ten years to satisfy the university presses? Proceeding in this fashion is sure to bring about a protracted bargaining process that will satisfy only those who like “muddling through”, or those intent on blocking an irreversible movement;**
- g) **The incentive, by asking publishers to report on downloads is another way to demonstrate the awkwardness of the proposed scheme. It will also allow presses to whine that they do not have the resources to provide yet another piece of bureaucratic statistics. Furthermore, if the work is truly in Open Access, secondary platforms will appear for some of the works (e.g. a classroom platform, or a thematic repository). As a result, these statistical results will be systematically underestimated (which will please university presses);**
- h) **Tying the incentives with ASPP scores makes the process ever more complex and bizarre. If this coupling aimed at demonstrating the top quality of the selected volumes, there might be a case for it, but this is not even put forward in the draft policy.**
- i) **Retroactive open access should be done independently of the current programme. If not, presses will organize to transform the incentive into a subsidy to proceed with retroactive digitization;**
- j) **The Federation should, at the very least, require one of two or three options among the Creative Commons licences. Otherwise, a confusing landscape of permissions will emerge. Ideally, a CC-by should be aimed at, all the more so that it would allow the possibility of trying at a commercial version of a successful digital work by the issuing publisher;**
- k) **Again, if a digital work is in Open Access, it is impossible to imagine how it could appear only on one site, short of imposing very restrictive licences. Such licences, in turn, could conflict with university policies on Open Access as they may evolve in the near future. Imagine, for example, that some Canadian universities should adopt the Liège model for internal performance assessments – will be considered only the materials in the institutional repository – how could this requirement be reconciled with a unique site connected with the publisher?**