



Linguistic Society of America

Comments on Plan S

The Linguistic Society of America (LSA) agrees with cOAlition S that “open access is foundational to the scientific enterprise” and that “researchers and research funders have a collective duty of care for the science system as a whole.” The LSA also supports the following principle, as stated by the cOAlition: “Universality is a fundamental principle of science (the term “science” as used here includes the humanities): only results that can be discussed, challenged, and, where appropriate, tested and reproduced by others qualify as scientific.”

However, the LSA is concerned that compliance with Plan S, as outlined in the Guidance on the Implementation, would pose an existential threat to the LSA’s operations. This potential threat is directly related to the LSA’s business model for funding its core mission. Since its inception, the LSA has used *net* revenue generated by its publishing activities to **underwrite and/or subsidize** its other work. The model contemplated by Plan S would not allow the LSA to generate any net revenue from its publications, and force it to rely more heavily on other funding streams to carry out its mission. Historically, these other funding streams have been inadequate to support the LSA’s work, and we are not sanguine about their future potential. In addition to the LSA’s concerns about the revenue implications of compliance with Plan S, our leadership is also concerned about potentially negative administrative and legal consequences. Finally, the LSA is concerned that the philosophical mindset underpinning Plan S may have negative consequences for the overall quality of submissions that the Society is able to attract and subsequently publish in our journals and proceedings.

To understand the LSA’s concerns, it is important to provide some background information about the Society and its publications in order to contextualize our further comments about Plan S implementation details and their implications.

Background

The LSA was founded in 1924 to advance the scientific study of language. With 3,700 members, it is one of the oldest and largest scholarly associations representing the discipline of linguistics. The LSA publishes a variety of scholarly publications, including its flagship journal *Language*, which has continuously published articles in all fields of linguistics since 1925. More recently, the LSA has explored open-access publishing models, resulting in the publication of two online journals: *Semantics and Pragmatics* (since 2008) and *Phonological Data and Analysis* (beginning in 2019), as well as proceedings for four conferences: Berkeley Linguistics Society (with LSA as publisher since 2008 and content from 1975 to 2014); Semantics and Linguistic Theory (with LSA as publisher since 2008 and content since 1991); Annual Meetings on Phonology (since 2013); and Annual Meetings of the LSA (since 2010). Most of these newer publications emerged from the LSA’s experiment with eLanguage (from 2008 to 2013),

an open-access publishing platform for scholarly linguistics content supported by various institutions and agencies in Germany. The LSA's experience as the publisher of all these scholarly materials informs our comments on Plan S.

Negative Implications for Mission Work

Since the LSA's inception, it has relied on a mix of revenue sources to support its mission. These have included membership dues (with a subscription to *Language* included as the primary benefit); subscription fees and royalties generated by *Language* (paid mainly by libraries); paid advertising in publications and on websites; conference registration fees; and charitable contributions. With the emergence of the internet, paid subscriptions for the print version of *Language* have declined significantly (from a peak of 5,400 in 2001 to the current level of 739), as has the total number of LSA members (from a highwater mark of 4,900 in 1990 to a low water mark of 3,400 in 2014). Advertising revenue for *Language* has plummeted (from a high of \$20,000 in 2001 to less than \$1000 in 2018). Royalties earned from our online site licensing program for *Language*, carried out in partnership with Project Muse (Johns Hopkins University Press) and JSTOR (ITHAKA), have not entirely compensated for this loss of revenue. While overall membership has declined, a significant minority (28 percent) of members still prefer to receive the print edition of *Language*, which costs more to produce and disseminate.

As the LSA has confronted these new realities of the publishing landscape, we have worked to adapt and evolve, while being true to our core mission. In recent decades, we have observed, with great dismay, the public disinvestment in higher education, and the harmful impact this has had on many aspects of our shared scholarly missions, including significant cuts to library subscription budgets. During this same period of time, the LSA has been courted by external publishers, both non-profit university presses and larger for-profit corporations, to bring our flagship journal under their banner. We have evaluated these overtures in the past, and concluded that we can better balance the needs of our readers, authors, members and subscribers by maintaining our role as the sole publisher of our journals. In particular, this has enabled the LSA to keep its subscription prices extremely low, starting at \$160 for a site license, and topping out at \$210 for a combination site license and hard copy edition mailed outside the USA. Where *Language* has been bundled with other journal collections, via Project Muse and JSTOR, the costs range from a low of \$30 per journal (for high schools) to a high of \$98 (for academic research institutions). This compares quite favorably with the other general linguistics journals that still maintain a subscription model, ranging from a low of \$293 (*Journal of Linguistics*) to a high of \$2297 (*Lingua*).

The LSA has long recognized that linguistics scholars around the world do not have equal access to scientific resources, including membership in the LSA and the ability to read our publications. To mitigate this inequity, the LSA has taken numerous concrete steps in each of its core mission areas:

Membership

- We offer a free membership program (including a subscription to *Language*) for scholars in developing countries who cannot afford to pay any dues at all. We also offer free memberships to K-12 teachers and students.
- We offer a reduced rate membership program to any scholar experiencing financial hardship.

- We offer students a below-cost membership fee, which is subsidized by our other revenue streams.
- We offer membership fee waivers for students experiencing financial hardship who wish to apply for a fellowship to attend our Summer Institute.
- We offer free lifetime honorary membership to scholars from outside North America who have made distinguished contributions to the discipline.

Publishing

- We publish all of our conference proceedings using a platinum open-access model.
- We publish our two online-only journals using a platinum open-access model.
- We participate in the JSTOR Register and Read program, which affords free access to any of our archival back content appearing in *Language*.
- We work with our publishing partners, Project MUSE and JSTOR¹, to offer reduced rate and/or free site licenses to their collections, which include *Language*. Please see the end notes for more details.
- We publish our flagship journal, *Language*, using a hybrid open-access model, with low article processing charges (n=\$400 for immediate OA) and fee waivers on request. All articles are freely available after a one-year embargo. All authors retain copyright and are entitled to make their work freely available in institutional repositories or other online venues.
- We actively promote the translation of the linguistics research we publish and/or present for a general audience, and provide open access to any member of the news media upon request. At least one article in each issue of *Language* is made fully open for this purpose.

Conferences and Institutes

- We offer scores of tuition fellowships and full fellowships to attend our biennial summer Linguistics Institute.
- Throughout 2019, we offer conference fee waivers to members of Indigenous communities.
- We offer a below-cost student registration fee to attend all of our conferences.
- We offer multiple travel awards for students from under-represented minority groups to attend our Annual Meeting.

Advocacy & Other Programs

- We provide financial support and actively participate in the AAAS Coalition on Science and Human Rights, which is dedicated to advancing Article 15 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) requiring states to: “recognize the right of everyone to enjoy the benefits of scientific progress and its applications.”
- We offer paid student internships to ensure that scholars have equal access to training opportunities in the LSA Secretariat.

¹ JSTOR provides free or low-cost access for the developing world. JSTOR offers free or very low-cost access to more than 1,500 institutions in Africa and in developing nations elsewhere in the world. This is made possible through a combination of philanthropic support and the fees paid by libraries in other countries around the world, as well as publishers’ eagerness to support this work.

- We offer a wealth of information about the scientific study of language via the LSA website that is freely available to the general public and widely read by hundreds of thousands of visitors annually.

ALL OF THE ABOVE ACTIVITIES ARE POSSIBLE BECAUSE THE LSA EARNS NET REVENUE FROM *LANGUAGE*. Without this revenue, the LSA would be forced to raise membership dues and/or conference fees, which would potentially create a vicious cycle of diminishing membership numbers and conference attendance, thus making those programs even less accessible. Moreover, we would have to make cuts to other mission-driven programs which are subsidized by our publishing revenue. These include our advocacy, public engagement, training, professional development, mentoring, outreach, awards, and support for Linguistic Institutes.

Negative Administrative and Legal Implications

Compliance with Plan S would create significant burdens for the LSA, even for our platinum open-access publications. The level of micro-management and scrutiny imposed by Plan S implementation guidance is an unprecedented intrusion into the day-to-day operations of scholarly publishers. For example, the requirement that publishers use a specific type of author agreement, CC-BY4, is inconsistent with the best legal advice about adequately protecting the rights of all participants in the publishing process. It is for this reason that the LSA has *adapted* a version of the CC-BY to meet the specific needs of our authors and publishing operations. Moreover, the requirement that “the public should be granted a worldwide, royalty-free, non-exclusive, irrevocable license to share (i.e. copy and redistribute the material in any medium or format) and adapt (i.e. remix, transform, and build upon the material) the work for any purpose, including commercially, provided proper attribution is given to the author” takes away the authors’ fundamental rights to their own intellectual property.

The requirements regarding documentation of actual publishing costs in order to secure a compliant designation from the cOAlition are unduly burdensome. In particular, the requirement that “information on the publishing costs and on any other factors impacting the publication fees (for example cross subsidising) must be openly available on the journal website/publishing platform. This must include details on direct costs, indirect costs and potential surplus.” Small non-profit publishers like the LSA, who use a variety of revenue sources to subsidize platinum open-access publications, should not have to undergo this level of scrutiny by a coalition of funding organizations who support little to no linguistics research. In the case of our hybrid open-access publication, *Language*, the cOAlition is demanding proprietary business information that is properly held by the members and funders of the LSA. The online publication of audited financial statements and federal tax returns, as the LSA has done years, should be sufficient for this purpose.

In formulating the APC currently charged for immediate OA in *Language*, the LSA examined its direct costs, along with the potential loss of revenue from our publishing partners who base their royalty payments on usage of content that is behind a paywall. We were also guided by the knowledge that linguistics, as a discipline, is not well-supported by external funding agencies, and therefore most linguists will not have access to significant funds to cover the cost of APCs. For this reason (and others), we established an APC (n=\$400) that is well below our actual direct costs, and does not compensate the Society for the potential loss of revenue. In addition, the LSA adopted a waiver policy for APCs that, while not automated, is easily obtained upon request to the Editor. The LSA’s platinum OA journals and

proceedings are able to operate without APCs of any kind precisely because their direct costs are subsidized by other LSA revenue streams.

If the LSA were to pursue compliance with Plan S for *Language*, it would be forced to increase the price of APCs to reflect our direct, indirect and expenses associated with subsidizing our other scholarly work. Since current revenue from *Language* comprises between one-third to one-half of our annual operating budget of ~ \$850,000, the Society would have to raise the price of its APCs quite significantly in order to cover those expenses. Since some authors would be automatically exempted from APCs by virtue of their nationality, the price for APCs would be inflated further for those authors *not* residing in those countries. Moreover, the LSA would be forced to charge APCs for its formerly platinum OA journals, since their operating subsidy from *Language* would no longer be available.

All of this would have to be documented, recalculated and published on an annual basis, thus creating additional administrative burdens, and adding to the cost of staff time that feeds into the pricing of the APC.

Negative Scholarly Implications

The Plan S requirement that “the venue where the article is published must have a solid system in place for review according to the standards within the relevant discipline, and according to the standards of the Committee on Publication Ethics (COPE)” introduces a level of subjective interpretation into the compliance procedure. How will the cOAlition determine whether articles published in LSA journals have a “solid” system? How will non-linguists in decision-making roles at the cOAlition determine whether review has been conducted “according to the standards within the relevant discipline”? This assumes that there is one universally agreed-upon standard in each field, including linguistics, which may not be the case currently, and does not allow for evolving and divergent standards to emerge.

The LSA recognizes that most scholars support open-access and will prefer to submit their research to publication venues that are compliant with Plan S. The LSA strives to provide publishing venues for linguists who believe in open access, while at the same time preserving the revenue that has enabled the Society to support so many other worthy scholarly programs and services. In the event that LSA cannot afford to comply with Plan S (in order to accommodate the small number of linguists with support from European funding agencies), we are extremely concerned about the chilling effect this may have on submissions from scholars who assume that the LSA does not offer any open access options. In essence, securing compliance with Plan S for *Language* would be an extremely costly route to satisfy a tiny fraction of our authors with external funding. The symbolic value of compliance would likely attract authors without EU funding who support full open access, but at a very great loss to the Society’s other scholarly programs and services.

Alternatives for Enhancing Access to Scientific Findings

The LSA works hard to raise public awareness about the findings of linguistics research. Over many decades of pursuing this goal, we have come to realize that most of the articles published in our journals cannot be understood by those without formal training in linguistics. As a result, we focus our public engagement efforts on translating linguistics research findings for a lay audience, and disseminating

these “translations” freely through a variety of communications channels. The LSA has invested significant resources in these efforts, and we encourage research funding agencies to collaborate with the scholars they support to translate their findings for a general audience. This could potentially have greater transformative impact than any new requirement imposed on where their research may be published.

The LSA also works hard to promote data sharing, replication and reproducibility within the scientific and scholarly communities. We make all supplemental data that authors provide in conjunction with their journal articles fully OA upon publication. We have organized workshops and developed other resources on this topic to encourage best practices within the linguistics community. We believe research funding agencies could more narrowly tailor requirements on Principal Investigators to share data, even if they *never* publish their findings in a journal article.

Conclusion

The LSA supports the goal of making scholarly content available to the broadest possible audience at the lowest possible cost (to readers, authors, publishers, libraries, research funding agencies and other stakeholders). That is why we have made the changes to our publishing program outlined above. However well-intentioned, Plan S will have the unintended consequence of forcing small non-profit scholarly society publishers like the LSA to choose between two damaging options: 1) compliance at the cost of decimating core mission work; or 2) non-compliance at a cost of losing authors with funding from EU agencies, or who subscribe to the principles of full open access above all other considerations. The LSA asks cOAlition S to reconsider its approach to Plan S to allow for greater flexibility and avoid burdensome intrusions into the mechanics of scholarly publishing.