Dear Mr. Smits,

On behalf of Frontiers, I am sharing with you the enclosed letter to extend her congratulations on your recent appointment as Special Adviser for Open Access and Innovation at the EPSC and to enquire on your availabilities for a F2F meeting in Brussels possibly on April 25th?

I also further looks forward to the group discussion with you tomorrow at the meeting of the EC Expert Group on Scholarly Publishing and Scholarly Communication where Frontiers is an appointed member.

Thank you very much in advance for your reply and consideration.

With kind regards,

Frontiers.

EU Liaison Office - Rue du Luxembourg 22-24, 1000 Brussels – Belgium
Phone: 
Email: @frontiersin.org
www.frontiersin.org
Find out more about Open Science and Frontiers in this TEDx Brussels talk
Dear Mr. Smits, dear [EPSC]

On behalf of Frontiers, I would like to extend our gratitude for a very interesting meeting this morning. You will find in attachment, for your convenience, the slide-deck we presented.

As agreed, in the coming week, we will also be sending further detailed information about Frontiers business model and pricing policies.

We very much look forward to collaborating with you and wish you the best of success in your new role and mission.

With kind regards,

[EPSC]

Find out more about Open Science and Frontiers in this TEDx Brussels talk
Dear Robert-Jan and [redacted]

Many thanks again for the very interesting and enjoyable meeting last week. We have in the meantime been busy preparing the data and statement regarding costs per article. We have decided to include not only past audited data but also our latest 2018 budget numbers. We are currently putting the final touches on this and I'll come back next week with the final data and document.

Kind regards,

---------------------------------------------
Frontiers
Avenue du Tribunal Fédéral 34
1005 Lausanne
Switzerland
T +41 21 510 17 14
www.frontiersin.org

Find out more about Open Science and Frontiers in this TEDx talk: http://bit.ly/2o45VJq

Dear [redacted]

Thank you for your mail!

I enjoyed our meeting and appreciate the follow up you will give by providing us further information about Frontiers pricing policies.

Kind Regards.

Robert-Jan Smits

Sent from my iPhone

---------------------------------------------
Frontiers
Avenue du Tribunal Fédéral 34
1005 Lausanne
Switzerland
T +41 21 510 17 14
www.frontiersin.org

Find out more about Open Science and Frontiers in this TEDx talk: http://bit.ly/2o45VJq

Dear [redacted]@ec.europa.eu wrote:

Dear [redacted]

Thank you for your mail!

I enjoyed our meeting and appreciate the follow up you will give by providing us further information about Frontiers pricing policies.

Kind Regards.

Robert-Jan Smits

Sent from my iPhone

---------------------------------------------
Frontiers
Avenue du Tribunal Fédéral 34
1005 Lausanne
Switzerland
T +41 21 510 17 14
www.frontiersin.org

Find out more about Open Science and Frontiers in this TEDx talk: http://bit.ly/2o45VJq

Dear [redacted]@frontiersin.org wrote:

Dear Mr. Smits, [redacted]
On behalf of Frontiers, I would like to extend our gratitude for a very interesting meeting this morning.

You will find in attachment, for your convenience, the slide-deck we presented.

As agreed, in the coming week, we will also be sending further detailed information about Frontiers business model and pricing policies.

We very much look forward to collaborating with you and wish you the best of success in your new role and mission.

With kind regards,

Frontiers, EU Liaison Office - Rue du Luxembourg 22-24, 1000 Brussels - Belgium

Phone: 

Email: 

www.frontiersin.org

Find out more about Open Science and Frontiers in this TEDx Brussels talk

<Meeting RJS -Frontiers 25042018.pdf>
Dear Robert-Jan,

(my colleagues just pointed out that the links in the attached document did not work - pls discard the previous one, here comes the correct version, sorry for the inconvenience!)

Following our recent meeting, I am pleased to attach the Frontiers Article Processing Charges (APC) policy. We have previously circulated this information to our 500 Editors-in-Chief.

Frontiers was founded ten years ago with the motto “for scientists, by scientists.” From the outset, this focus has set us apart from all other publishers with a relentless insistence on editorial excellence and transparency, and with an exceptional focus on technological innovation. Our track record proves that our model enables high-quality, high-impact articles to be published efficiently at scale. Today, Frontiers’ 61 journals have together published 90,000 peer-reviewed articles across 500 academic specialties. Our journals consistently lead their categories as measured by traditional metrics such as Journal Citation Reports (Clarivate Analytics) and CiteScore (Scopus) and have received over 420 Million article views and downloads (as measured with our pioneering article-level metrics).

We achieve this with our APC-based business model that is designed to be sustainable and inclusive, while allowing us to invest in innovation.

Investment in technology and innovation is a critically important part of our APC policy. The Frontiers Open Science Platform, built with feedback from literally thousands of researchers and with an investment exceeding $100 million, has been funded to a large extent via competitively priced APCs. Currently we employ over 400 staff, of which 200 IT and product development staff continuously refine our Open Science technologies and workflows. Technology allows us to provide a world-class editorial service as well as scientific excellence in the article output at relatively low cost, as benchmarked against other high-output, high-quality publishers (see Figures 3-5, pages 6-7 in the attached document).

Inclusivity is the other critically important part of our APC policy, guaranteed via two mechanisms: a variable APC and a no-questions-asked policy for waivers and discounts.

As you can see in the attached document, we define five categories of APCs that vary according to journal maturity and funding availability for research as well as open-access publishing. Depending on the journal category, APCs range from US$ 2'950 (€2,440) for our most mature journals with well-established OA support to US$ 950 (€790) for newly launched journals and/or those in fields that have overall lower research budgets available or where OA is not yet well supported (e.g. many humanities and social sciences fields). This means that our mature journals with better funded communities in effect support and subsidize newer journals, as well as communities with lower levels of research or OA funding. This policy ensures that all research communities fully benefit from Open Science. Our average APC across all journal categories, and after discounts & waivers and adjustments for lower-priced article types, is US$ 1'850 (€1’540). This average APC describes the actual income we receive per article.

Our policy also calls for discounts and full waivers whenever needed; in fact, this expenditure represents 11% of our APC-based income (see pages 17-20 for statistics).
During our meeting, I sensed that you are considering imposing a cap on APCs for articles based on European-funded research. In our view, such a policy would hamper the development of a robust open-access market in Europe. Cost minimization is important, but capping APCs could create unintended, new risks that could undermine our mission – the full transition to open-access publishing. Please consider the following:

1. Imposing an OA model with low, capped APCs would mean a 60% loss of revenue for commercial and society publishers that currently use the subscription model. These would need to reduce investment in high-value services and make major cuts in their estimated 110’000 workforce. Subscription publishers, who currently publish about 90% of annual research papers, thus have strong incentives to resist a transition to OA.

2. Capping APCs at a low price would put the new breed of innovative Gold OA publishers at a competitive disadvantage. It would prevent us from establishing an APC schedule capable of fully covering the costs of a high-quality service. We need to hire the best talent, invest in innovative technology, subsidize younger OA initiatives and build up a stable foundation of capital – key ingredients for sustainable, high-quality publishing. Ironically, capping APCs for Gold Open Access journals removes the level playing field, distorting fair competition between OA publishers and subscription publishers, the latter who receive two to three times the income per article published.

3. Even at Frontiers – a company that is sufficiently robust to adjust to capped pricing – the imposition of caps would have huge implications. It would put pressure on us to divert workforce out of Europe to “low-cost” locations; severely undermine our policy of inclusivity; and reduce our investment in innovation. Growth of our business and the rate of technological breakthroughs would both be impacted.

Transitioning to 100% open access is analog to the transition to clean energy. Would it make sense to place caps on the price of solar panels, if the goal were to move to 100% renewable energy? A tax on carbon emissions is a more constructive mechanism towards the goal. In this analogy, caps on “Big Deal” subscription packages would be more effective in driving the transition to full open access than capping the emerging Open Access market – particularly since OA APCs already cut the costs of publishing by more than half (a tremendous achievement in itself!).

We firmly believe that the rapid transition to Open Access should be the main goal – artificially regulating the emerging Open Access market would only perpetuate, unintendedly, the subscription model.

We advocate for a transparent market place that allows fair competition, because in such a market added value can be openly assessed and prices can self-regulate. To this end, we support:

- Full transparency in pricing policy;
- Elimination of NDAs for public procurement of subscriptions or any type of publishing services;
- Focus on transparent consortium and national agreements that simplify logistics of APC payments and allow for clear budgeting and centralized invoicing;
- A clear commitment from funders to transition to open science, for example such as the crystal-clear Open Access policy of the Gates foundation.

Our recent and first-of-the kind national agreements with Austria and now Sweden (to be announced on Friday with initially 21 participating universities) show that full transparency in publishing agreements can be done, can be simple and straightforward – and costs a fraction of a subscription deal.

One last comment on funders: Funders have always carried the costs of publishing - in the subscription model it is just a hidden overhead fraction that is distributed from research grants to libraries. Now that APCs make these costs transparent and introduce them as a clear line item in funders budgets, instead of trying to cap them funders need to compare them to the hidden subscription costs - OA is cutting publication costs by more than half and could free grant budgets for more research that is freely accessible to all.
Ultimately, high-quality publication services come at a cost. At Frontiers, we believe that an APC policy must be structured in an inclusive and transparent way to serve all stakeholders and must be re-invested responsibly. I hope that providing you with full visibility on our pricing policy will be useful in your own efforts to define the way forward towards a functional marketplace that accelerates the transition to full open access in Europe, a mission that we passionately support.

We would be very pleased to meet with you at this time, or at a later date at your convenience, to discuss these points further.

Very best regards,

PS:
Dear [Name],

Thank you very much for your mail with this very useful input!

We have begun to analyze this and will certainly get back to you in case there are questions.

Perhaps we can meet after this, say at 18.00 hours.

Kind Regards.

Robert-Jan

Sent from my iPhone

Dear Robert-Jan,

(my colleagues just pointed out that the links in the attached document did not work - please discard the previous one, here comes the correct version, sorry for the inconvenience!)

Following our recent meeting, I am pleased to attach the Frontiers Article Processing Charges (APC) policy. We have previously circulated this information to our 500 Editors-in-Chief.

Frontiers was founded ten years ago with the motto “for scientists, by scientists.” From the outset, this focus has set us apart from all other publishers with a relentless insistence on editorial excellence and transparency, and with an exceptional focus on technological innovation. Our track record proves that our model enables high-quality, high-impact articles to be published efficiently at scale. Today, Frontiers’ 61 journals have together published 90,000 peer-reviewed articles across 500 academic specialties. Our journals consistently lead their categories as measured by traditional metrics such as Journal Citation Reports (Clarivate Analytics) and CiteScore (Scopus) and have received over 420 Million article views and downloads (as measured with our pioneering article-level metrics).

We achieve this with our APC-based business model that is designed to be sustainable and inclusive, while allowing us to invest in innovation.

Investment in technology and innovation is a critically important part of our APC policy. The Frontiers Open Science Platform, built with feedback from literally thousands of researchers and with an investment exceeding $100 million, has been funded to a large extent via competitively priced APCs. Currently we employ over 400 staff, of which 200 IT and product development staff continuously refine our Open Science technologies and workflows. Technology allows us to provide a world-class editorial service as well as
scientific excellence in the article output at relatively low cost, as benchmarked against other high-output, high-quality publishers (see Figures 3-5, pages 6-7 in the attached document).

Inclusivity is the other critically important part of our APC policy, guaranteed via two mechanisms: a variable APC and a no-questions-asked policy for waivers and discounts.

As you can see in the attached document, we define five categories of APCs that vary according to journal maturity and funding availability for research as well as open-access publishing. Depending on the journal category, APCs range from US$ 2'950 (€2,440) for our most mature journals with well-established OA support to US$ 950 (€790) for newly launched journals and/or those in fields that have overall lower research budgets available or where OA is not yet well supported (e.g. many humanities and social sciences fields). This means that our mature journals with better funded communities in effect support and subsidize newer journals, as well as communities with lower levels of research or OA funding. This policy ensures that all research communities fully benefit from Open Science. Our average APC across all journal categories, and after discounts & waivers and adjustments for lower-priced article types, is US$ 1'850 (€1'540). This average APC describes the actual income we receive per article.

Our policy also calls for discounts and full waivers whenever needed; in fact, this expenditure represents 11% of our APC-based income (see pages 17-20 for statistics).

During our meeting, I sensed that you are considering imposing a cap on APCs for articles based on European-funded research. In our view, such a policy would hamper the development of a robust open-access market in Europe. Cost minimization is important, but capping APCs could create unintended, new risks that could undermine our mission – the full transition to open-access publishing. Please consider the following:

1. Imposing an OA model with low, capped APCs would mean a 60% loss of revenue for commercial and society publishers that currently use the subscription model. These would need to reduce investment in high-value services and make major cuts in their estimated 110'000 workforce. Subscription publishers, who currently publish about 90% of annual research papers, thus have strong incentives to resist a transition to OA.

2. Capping APCs at a low price would put the new breed of innovative Gold OA publishers at a competitive disadvantage. It would prevent us from establishing an APC schedule capable of fully covering the costs of a high-quality service. We need to hire the best talent, invest in innovative technology, subsidize younger OA initiatives and build up a stable foundation of capital – key ingredients for sustainable, high-quality publishing. Ironically, capping APCs for Gold Open Access journals removes the level playing field, distorting fair competition between OA publishers and subscription publishers, the latter who receive two to three times the income per article published.

3. Even at Frontiers – a company that is sufficiently robust to adjust to capped pricing – the imposition of caps would have huge implications. It would put pressure on us to divert workforce out of Europe to “low-cost” locations; severely undermine our policy of inclusivity; and reduce our investment in innovation. Growth of our business and the rate of technological breakthroughs would both be impacted.

Transitioning to 100% open access is analogous to the transition to clean energy. Would it make sense to place caps on the price of solar panels, if the goal were to move to 100% renewable energy? A tax on carbon emissions is a more constructive mechanism towards the goal. In this analogy, caps on “Big Deal” subscription packages would be more effective in driving the transition to full open access than capping the emerging Open Access market –
particularly since OA APCs already cut the costs of publishing by more than half (a tremendous achievement in itself).

We firmly believe that the rapid transition to Open Access should be the main goal – artificially regulating the emerging Open Access market would only perpetuate, unintendedly, the subscription model.

We advocate for a transparent market place that allows fair competition, because in such a market added value can be openly assessed and prices can self-regulate. To this end, we support:

- Full transparency in pricing policy;
- Elimination of NDAs for public procurement of subscriptions or any type of publishing services;
- Focus on transparent consortium and national agreements that simplify logistics of APC payments and allow for clear budgeting and centralized invoicing;
- A clear commitment from funders to transition to open science, for example such as the crystal-clear Open Access policy of the Gates foundation.

Our recent and first-of-the kind national agreements with Austria and now Sweden (to be announced on Friday with initially 21 participating universities) show that full transparency in publishing agreements can be done, can be simple and straightforward – and costs a fraction of a subscription deal.

One last comment on funders: Funders have always carried the costs of publishing - in the subscription model it is just a hidden overhead fraction that is distributed from research grants to libraries. Now that APCs make these costs transparent and introduce them as a clear line item in funders budgets, instead of trying to cap them funders need to compare them to the hidden subscription costs - OA is cutting publication costs by more than half and could free grant budgets for more research that is freely accessible to all.

Ultimately, high-quality publication services come at a cost. At Frontiers, we believe that an APC policy must be structured in an inclusive and transparent way to serve all stakeholders and must be re-invested responsibly. I hope that providing you with full visibility on our pricing policy will be useful in your own efforts to define the way forward towards a functional marketplace that accelerates the transition to full open access in Europe, a mission that we passionately support.

We would be very pleased to meet with you at this time, or at a later date at your convenience to discuss these points further.

Very best regards,

PS

<Frontiers APC Policy_180529.pdf>
Dear Robert-Jan,

Congratulations!

My tour of Europe’s capitals has made it clear to me that an increasing number of countries will take similar actions to accelerate the transition to full and immediate Open Access.

Kind Regards.

Robert-Jan

Sent from my iPhone

@frontiersin.org wrote:

Dear Robert-Jan,

just a quick follow up: we announced today a national Open Access agreement between Sweden’s libraries and Frontiers: https://blog.frontiersin.org/2019/06/01/sweden-open-access-publishing-deal/

It’s the second of this kind (after Austria) and others will follow.

This is a good step forward towards the transition to Open Access and a fully transparent marketplace for publishing services.
Kind regards,

Frontiers
Avenue du Tribunal Fédéral 34
1005 Lausanne
Switzerland

Find out more about Open Science and Frontiers in this TEDx talk: http://bit.ly/2o45VJg
Dear Kamila,

No problem whatsoever!

I will meet with...

Kind Regards,

Robert-Jan SMITS
Open Access and Innovation

European Commission
European Political Strategy Centre

http://ec.europa.eu/research

Dear Robert-Jan,

Thanks again for your kind message and offer to meet. Unfortunately, I finally can’t make it to Brussels on...

As an important recent commitment requires my presence. So sorry about this last-minute change will replace...
I also remain fully available to talk with you by phone at any point and, if our agenda allows, I would suggest we meet again in person.

With kind regards,

Frontiers
Avenue du Tribunal Fédéral 34
1005 Lausanne
Switzerland

www.frontiersin.org
twitter: @Frontiersin

Find out more about Open Science and Frontiers in this TEDx talk: http://bit.ly/2o45VJg


---

@ec.europa.eu wrote:

Dear

Thank you very much for your mail with this very useful input!

We have begun to analyse this and will certainly get back to you in case there are questions.

Perhaps we can meet after this, say at 18.00 hours.

Kind Regards.

Robert-Jan

Sent from my iPhone

@frontiersin.org> wrote:
Dear Robert-Jan,

(my colleagues just pointed out that the links in the attached document did not work - pls discard the previous one, here comes the correct version, sorry for the inconvenience!)

Following our recent meeting, I am pleased to attach the Frontiers Article Processing Charges (APC) policy. We have previously circulated this information to our 500 Editors-in-Chief.

Frontiers was founded ten years ago with the motto “for scientists, by scientists.” From the outset, this focus has set us apart from all other publishers with a relentless insistence on editorial excellence and transparency, and with an exceptional focus on technological innovation. Our track record proves that our model enables high-quality, high-impact articles to be published efficiently at scale. Today, Frontiers’ 61 journals have together published 90,000 peer-reviewed articles across 500 academic specialties. Our journals consistently lead their categories as measured by traditional metrics such as Journal Citation Reports (Clarivate Analytics) and CiteScore (Scopus) and have received over 420 Million article views and downloads (as measured with our pioneering article-level metrics).

We achieve this with our APC-based business model that is designed to be sustainable and inclusive, while allowing us to invest in innovation.

Investment in technology and innovation is a critically important part of our APC policy. The Frontiers Open Science Platform, built with feedback from literally thousands of researchers and with an investment exceeding $100 million, has been funded to a large extent via competitively priced APCs. Currently we employ over 400 staff, of which 200 IT and product development staff continuously refine our Open Science technologies and workflows. Technology allows us to provide a world-class editorial service as well as scientific excellence in the article output at relatively low cost, as benchmarked against other high-output, high-quality publishers (see Figures 3-5, pages 6-7 in the attached document).

Inclusivity is the other critically important part of our APC policy, guaranteed via two mechanisms: a variable APC and a no-questions-asked policy for waivers and discounts.
As you can see in the attached document, we define five categories of APCs that vary according to journal maturity and funding availability for research as well as open-access publishing. Depending on the journal category, APCs range from US$ 2'950 (€2,440) for our most mature journals with well-established OA support to US$ 950 (€790) for newly launched journals and/or those in fields that have overall lower research budgets available or where OA is not yet well supported (e.g. many humanities and social sciences fields). This means that our mature journals with better funded communities in effect support and subsidize newer journals, as well as communities with lower levels of research or OA funding. This policy ensures that all research communities fully benefit from Open Science. Our average APC across all journal categories, and after discounts & waivers and adjustments for lower-priced article types, is US$ 1'850 (€1'540). This average APC describes the actual income we receive per article.

Our policy also calls for discounts and full waivers whenever needed; in fact, this expenditure represents 11% of our APC-based income (see pages 17-20 for statistics).

During our meeting, I sensed that you are considering imposing a cap on APCs for articles based on European-funded research. In our view, such a policy would hamper the development of a robust open-access market in Europe. Cost minimization is important, but capping APCs could create unintended, new risks that could undermine our mission – the full transition to open-access publishing. Please consider the following:

1. Imposing an OA model with low, capped APCs would mean a 60% loss of revenue for commercial and society publishers that currently use the subscription model. These would need to reduce investment in high-value services and make major cuts in their estimated 110'000 workforce. Subscription publishers, who currently publish about 90% of annual research papers, thus have strong incentives to resist a transition to OA.

2. Capping APCs at a low price would put the new breed of innovative Gold OA publishers at a competitive disadvantage. It would prevent us from establishing an APC schedule capable of fully covering the costs of a high-quality service. We need to hire the best talent, invest in innovative technology, subsidize younger OA initiatives and build up a stable foundation of capital – key ingredients for sustainable, high-
quality publishing. Ironically, capping APCs for Gold Open Access journals removes the level playing field, distorting fair competition between OA publishers and subscription publishers, the latter who receive two to three times the income per article published.

3. Even at Frontiers—a company that is sufficiently robust to adjust to capped pricing—the imposition of caps would have huge implications. It would put pressure on us to divert workforce out of Europe to “low-cost” locations; severely undermine our policy of inclusivity; and reduce our investment in innovation. Growth of our business and the rate of technological breakthroughs would both be impacted.

Transitioning to 100% open access is analog to the transition to clean energy. Would it make sense to place caps on the price of solar panels, if the goal were to move to 100% renewable energy? A tax on carbon emissions is a more constructive mechanism towards the goal. In this analogy, caps on “Big Deal” subscription packages would be more effective in driving the transition to full open access than capping the emerging Open Access market—particularly since OA APCs already cut the costs of publishing by more than half (a tremendous achievement in itself!).

We firmly believe that the rapid transition to Open Access should be the main goal—artificially regulating the emerging Open Access market would only perpetuate, unintendedly, the subscription model.

We advocate for a transparent market place that allows fair competition, because in such a market added value can be openly assessed and prices can self-regulate. To this end, we support:

- Full transparency in pricing policy;
- Elimination of NDAs for public procurement of subscriptions or any type of publishing services;
- Focus on transparent consortium and national agreements that simplify logistics of APC payments and allow for clear budgeting and centralized invoicing;
- A clear commitment from funders to transition to open science, for example such as the crystal-clear Open Access policy of the Gates foundation.

Our recent and first-of-the kind national agreements with Austria and now Sweden (to be announced on Friday with initially 21 participating universities) show that full transparency in publishing agreements can be
done, can be simple and straightforward – and costs a fraction of a subscription deal.

One last comment on funders: Funders have always carried the costs of publishing - in the subscription model it is just a hidden overhead fraction that is distributed from research grants to libraries. Now that APC's make these costs transparent and introduce them as a clear line item in funders budgets, instead of trying to cap them funders need to compare them to the hidden subscription costs - OA is cutting publication costs by more than half and could free grant budgets for more research that is freely accessible to all.

Ultimately, high-quality publication services come at a cost. At Frontiers, we believe that an APC policy must be structured in an inclusive and transparent way to serve all stakeholders and must be re-invested responsibly. I hope that providing you with full visibility on our pricing policy will be useful in your own efforts to define the way forward towards a functional marketplace that accelerates the transition to full open access in Europe, a mission that we passionately support.

We would be very pleased to meet with you at this time, or at a later date at your convenience to discuss these points further.

Very best regards,

<Frontiers APC Policy_180529.pdf>

PS:
Dear [Name],

Thank you for your mail! I really appreciate this input because we are on the eve of taking groundbreaking decisions and have to make sure that we take the right decisions.

I remain convinced of the necessity to impose a cap on the APC. In this context, I like what the Swiss did: they started by imposing a cap and once the market had stabilised, they removed the cap.

However, since I am building a Europe-wide coalition of Funding Agencies, I will not get my way on everything (including caps).

Kind Regards.

Robert-Jan

Sent from my iPhone

---

As a matter of fact, before we talked on Friday, I was just writing an email to you, below, to follow up on last week’s meeting and some additional input for Plan S.

- thanks again for taking the time for the meeting.

... Just for the record, no caps is best, (but if there must be one, I do know from informal discussions that some of the subscription publishers would be able to fully flip to OA at 3K Euros).

If I may, I’d like to offer additional context on this matter. At Frontiers, we are fully behind your approach of uniting funders to accelerate the transition to full open access. However, we are concerned that a focus on APC caps could delay or jeopardise our shared goal of a full transition to OA in Europe for the following reasons:

1/ APCs are not a principal obstacle to OA publishing

Capping APCs would implicitly signal that OA publishers are overcharging for their services and placing an unreasonable burden on institutional budgets. In fact, our direct experience in establishing national publishing agreements (that are fully transparent and publicly available, for Austria here and coming soon for Sweden here) shows that APCs are not the issue. OA publications already cost 1/3 to 1/2 of the price of subscriptions and therefore the transition will already save money, as calculated by the Max Plank Institute. The Swiss have dropped APC caps as being a confusing message and not helpful to drive Open Access.

A focus on APCs therefore misdirects the debate away from the principal need to fully transition to immediate Open Science and to establish a fully transparent market conductive to fair competition.
2/ Artificial market regulation via caps is likely to cause harmful unintended consequences

For example:

- In other industries, caps have historically led to overall cost increases as the cap level becomes accepted across an industry as a collective price point, thereby all but eliminating competition and encouraging suppliers (most of whom already operate below the cap level) to drift up towards the established limit (please see Knittel and Stango, American Economic Review, 2003 - Article).
- Market distortion via unilateral price ceilings are also liable to put world-leading European innovators in scholarly OA publishing at a competitive disadvantage globally.
- This handicap could also destroy the long-tail of small OA publishers.
- APC caps will also dissuade the large subscription publishers from transitioning to OA. Elsevier earns around 6'000 Euro/paper. The staunch resistance of these publishers to capping will only significantly delay the OA transition.

Typically, subsidizing new technologies to strengthen their competitiveness seems to work. This has been applied successfully by governments in several sectors, such as solar panels, electric car plug-ins, IoT, 4G internet – to name a few. APC caps would be contrary to this principle and cause harmful unintended consequences. (We are not asking for subsidies, to be sure! Just making my point.)

If anything, regulating the subscription market could fuel the transition to the open access model.

Another thing to look into might be whether the subscription market with its non-disclosure agreements is compatible with European Competition Law. A Competition Law specialist might assess the situation and make recommendations how to move towards full contractual and pricing transparency that allows all actors in the market to compete fairly and compare prizes for value received.

Our vision

We believe that a transition to a full OA system could be achieved with these steps:

1. Establish a transparent, free market where market forces shape the relationship between price and value. This means to ban non-disclosure agreements between subscription publishers (or any publishers) and publicly funded universities. This will allow all actors in the system to assess the relationship between service value and price openly, compare and negotiate better deals.
2. Mandate that publicly funded research should be published in fully OA journals - not hybrids. (Not capping them, will allow hybrids to fully flip to OA).
3. Focus research evaluation on objective article-level and author-level metrics (rather than Journal Impact Factors and where researchers publish).

I hope you will understand that is a subject of some concern for us — not so much as an OA publisher (we might even benefit if hybrids are banned and caps imposed), but as a responsible partner committed to enhancing knowledge transfer within the European Research Area.

I know time is tight now, just wanted to get these points across again.

With kind regards,
Dear,

Thank you very much for your mail with this very useful input!

We have begun to analyse this and will certainly get back to you in case there are questions.

Perhaps we can meet after this, say at 18.00 hours.

Kind Regards.

Robert-Jan

Sent from my iPhone

@frontiersin.org> wrote:

Dear Robert-Jan,

(my colleagues just pointed out that the links in the attached document did not work - pls discard the previous one, here comes the correct version, sorry for the inconvenience!)

Following our recent meeting, I am pleased to attach the Frontiers Article Processing Charges (APC) policy. We have previously circulated this information to our 500 Editors-in-Chief.

Frontiers was founded ten years ago with the motto “for scientists, by scientists.” From the outset, this focus has set us apart from all other publishers with a relentless insistence on editorial excellence and transparency, and with an exceptional focus on technological innovation. Our track record proves that our model enables high-quality, high-impact articles to be published efficiently at scale. Today, Frontiers’ 61 journals have together published 90,000 peer-reviewed articles across 500 academic specialties. Our journals consistently lead their categories as measured by traditional metrics such as Journal Citation Reports (Clarivate Analytics) and CiteScore (Scopus)
and have received over 420 Million article views and downloads (as measured with our pioneering article-level metrics).

We achieve this with our APC-based business model that is designed to be sustainable and inclusive, while allowing us to invest in innovation.

Investment in technology and innovation is a critically important part of our APC policy. The Frontiers Open Science Platform, built with feedback from literally thousands of researchers and with an investment exceeding $100 million, has been funded to a large extent via competitively priced APCs. Currently we employ over 400 staff, of which 200 IT and product development staff continuously refine our Open Science technologies and workflows. Technology allows us to provide a world-class editorial service as well as scientific excellence in the article output at relatively low cost, as benchmarked against other high-output, high-quality publishers (see Figures 3-5, pages 6-7 in the attached document).

Inclusivity is the other critically important part of our APC policy, guaranteed via two mechanisms: a variable APC and a no-questions-asked policy for waivers and discounts.

As you can see in the attached document, we define five categories of APCs that vary according to journal maturity and funding availability for research as well as open-access publishing. Depending on the journal category, APCs range from US$ 2'950 (€2,440) for our most mature journals with well-established OA support to US$ 950 (€790) for newly launched journals and/or those in fields that have overall lower research budgets available or where OA is not yet well supported (e.g. many humanities and social sciences fields). This means that our mature journals with better funded communities in effect support and subsidize newer journals, as well as communities with lower levels of research or OA funding. This policy ensures that all research communities fully benefit from Open Science. Our average APC across all journal categories, and after discounts & waivers and adjustments for lower-priced article types, is US$ 1'850 (€1'540). This average APC describes the actual income we receive per article.

Our policy also calls for discounts and full waivers whenever needed; in fact, this expenditure represents 11% of our APC-based income (see pages 17-20 for statistics).

During our meeting, I sensed that you are considering imposing a cap on APCs for articles based on European-funded research. In our view, such a policy would hamper the development of a robust open-access market in Europe. Cost minimization is important, but capping APCs could create unintended, new risks that could undermine our mission – the
full transition to open-access publishing. Please consider the
following:

1. Imposing an OA model with low, capped APCs would mean a 60% loss of revenue for commercial and society publishers that currently use the subscription model. These would need to reduce investment in high-value services and make major cuts in their estimated 110'000 workforce. Subscription publishers, who currently publish about 90% of annual research papers, thus have strong incentives to resist a transition to OA.

2. Capping APCs at a low price would put the new breed of innovative Gold OA publishers at a competitive disadvantage. It would prevent us from establishing an APC schedule capable of fully covering the costs of a high-quality service. We need to hire the best talent, invest in innovative technology, subsidize younger OA initiatives and build up a stable foundation of capital – key ingredients for sustainable, high-quality publishing. Ironically, capping APCs for Gold Open Access journals removes the level playing field, distorting fair competition between OA publishers and subscription publishers, the latter who receive two to three times the income per article published.

3. Even at Frontiers – a company that is sufficiently robust to adjust to capped pricing – the imposition of caps would have huge implications. It would put pressure on us to divert workforce out of Europe to “low-cost” locations; severely undermine our policy of inclusivity; and reduce our investment in innovation. Growth of our business and the rate of technological breakthroughs would both be impacted.

Transitioning to 100% open access is analog to the transition to clean energy. Would it make sense to place caps on the price of solar panels, if the goal were to move to 100% renewable energy? A tax on carbon emissions is a more constructive mechanism towards the goal. In this analogy, caps on “Big Deal” subscription packages would be more effective in driving the transition to full open access than capping the emerging Open Access market – particularly since OA APCs already cut the costs of publishing by more than half (a tremendous achievement in itself!).

We firmly believe that the rapid transition to Open Access should be the main goal – artificially regulating the emerging Open Access market would only perpetuate, unintendedly, the subscription model.

We advocate for a transparent market place that allows fair competition, because in such a market added value can be openly assessed and prices can self-regulate. To this end, we support:
• Full transparency in pricing policy;
• Elimination of NDAs for public procurement of subscriptions or any type of publishing services;
• Focus on transparent consortium and national agreements that simplify logistics of APC payments and allow for clear budgeting and centralized invoicing;
• A clear commitment from funders to transition to open science, for example such as the crystal-clear Open Access policy of the Gates foundation.

Our recent and first-of-the kind national agreements with Austria and now Sweden (to be announced on Friday with initially 21 participating universities) show that full transparency in publishing agreements can be done, can be simple and straightforward – and costs a fraction of a subscription deal.

One last comment on funders: Funders have always carried the costs of publishing - in the subscription model it is just a hidden overhead fraction that is distributed from research grants to libraries. Now that APCs make these costs transparent and introduce them as a clear line item in funders budgets, instead of trying to cap them funders need to compare them to the hidden subscription costs - OA is cutting publication costs by more than half and could free grant budgets for more research that is freely accessible to all.

Ultimately, high-quality publication services come at a cost. At Frontiers, we believe that an APC policy must be structured in an inclusive and transparent way to serve all stakeholders and must be re-invested responsibly. I hope that providing you with full visibility on our pricing policy will be useful in your own efforts to define the way forward towards a functional marketplace that accelerates the transition to full open access in Europe, a mission that we passionately support.

We would be very pleased to meet with you at this time, or at a later date at your convenience to discuss these points further.

Very best regards,

PS:
Out of scope
Dear [Name],

I am very pleased to inform you that 'PLAN S' - a set of principles to accelerate the transition to full and immediate Open Access to scientific publications - will be released on 4 September 2018.

Several national research funders, members of Science Europe have signed up to the PLAN and both the European Commission and the ERC are supporting it in view of Horizon Europe.

Full details of the PLAN and supporting documents are being forwarded to you by Science Europe.

Based on the constructive discussions we have had over the last months, for which I would like to thank you once more, I really hope that your organisation will be able to express both its overall support for the PLAN as well as to propose how it could contribute to its implementation.

I am looking forward to continuing to work with you and other stakeholders to take PLAN S forward.

Kind regards,

Robert-Jan SMITS
Open Access and Innovation

http://ec.europa.eu/research
Dear [Name],

Thank you for your mail and for your readiness to publish. Hope to see you soon in Brussels or Lausanne.

Kind Regards.

Robert-Jan

---

Dear Robert-Jan,

My heartfelt congratulations on a momentous achievement of uniting this amount of founders behind Plan S!

We are excited to publish and disseminate it tomorrow and will put all our force behind it on social media and our newsletter to 500K researchers.

I am very much looking forward to continue the discussion on the details of the implementation to ensure open access to high quality and rigorously certified research.

Warm regards,

[Name]

---

Dear [Name],

I am very pleased to inform you that 'PLAN S' – a set of principles to accelerate the transition to full and immediate Open Access to scientific publications - will be released on 4 September 2018.

Several national research funders, members of Science Europe have signed up to the PLAN and both the European Commission and the ERC are supporting it in view of Horizon Europe.

Full details of the PLAN and supporting documents are being forwarded to you by Science Europe.
Based on the constructive discussions we have had over the last months, for which I would like to thank you once more, I really hope that your organisation will be able to express both its overall support for the PLAN as well as to propose how it could contribute to its implementation.

I am looking forward to continuing to work with you and other stakeholders to take PLAN S forward.

Kind regards,

Robert-Jan SMITS
Open Access and Innovation

-European Commission
European Political Strategy Centre

@ec.europa.eu

http://ec.europa.eu/research
Dear Robert-Jan,

My heartfelt congratulations on a momentous achievement of uniting this amount of founders behind Plan S!

We are excited to publish and disseminate it tomorrow and will put all our force behind it on social media and our newsletter to 500K researchers.

I am very much looking forward to continue the discussion on the details of the implementation to ensure open access to high quality and rigorously certified research.

Warm regards,

Robert-Jan SMITS
Open Access and Innovation
European Commission
http://ec.europa.eu/research
Dear Robert-Jan,

I started reading the news articles on #PlanS - this is just wonderful, the 434 people here at Frontiers are super-excited.

Here are the links to the PlanS article and blog on Frontiers and the tweet that went out.

Again, congratulations on a great success!

Sent from my iPhone

--

cc.europa.eu> wrote:

Dear Robert-Jan,

Thank you for your mail and for your readiness to publish. I am very much looking forward to continue the discussion on the details of the implementation to ensure open access to high quality and rigorously certified research.

Warm regards,

Robert-Jan

Sent from my iPhone

--

cc.europa.eu> wrote:

I am very pleased to inform you that 'PLAN S' - a set of principles to accelerate the transition to full and immediate Open Access to scientific publications - will be released on 4 September 2018.
Several national research funders, members of Science Europe have signed up to the PLAN and both the European Commission and the ERC are supporting it in view of Horizon Europe.

Full details of the PLAN and supporting documents are being forwarded to you by Science Europe.

Based on the constructive discussions we have had over the last months, for which I would like to thank you once more, I really hope that your organisation will be able to express both its overall support for the PLAN as well as to propose how it could contribute to its implementation.

I am looking forward to continuing to work with you and other stakeholders to take PLAN S forward.

Kind regards,

Robert-Jan SMITS
Open Access and Innovation

European Commission
European Political Strategy Centre

http://ec.europa.eu/research
Dear Robert-Jan,

I started reading the news articles on #PlanS - this is just wonderful, the 434 people here at Frontiers are super-excited.

Here are the links to the PlanS article and blog on Frontiers and the tweet that went out.

Again, congratulations on a great success!
Thank you for your mail and for your readiness to publish.

Hope to see you soon in Brussels or Lausanne.

Kind Regards.

Robert-Jan

Sent from my iPhone

Dear Robert-Jan,

My heartfelt congratulations on a momentous achievement of uniting this amount of founders behind Plan S!

We are excited to publish and disseminate it tomorrow and will put all our force behind it on social media and our newsletter to 500K researchers.

I am very much looking forward to continue the discussion on the details of the implementation to ensure open access to high quality and rigorously certified research.

Warm regards,

Robert-Jan SMITS
Open Access and Innovation

I am very pleased to inform you that ‘PLAN S’ - a set of principles to accelerate the transition to full and immediate Open Access to scientific publications - will be released on 4 September 2018.

Several national research funders, members of Science Europe have signed up to the PLAN and both the European Commission and the ERC are supporting it in view of Horizon Europe.

Full details of the PLAN and supporting documents are being forwarded to you by Science Europe.

Based on the constructive discussions we have had over the last months, for which I would like to thank you once more, I really hope that your organisation will be able to express both its overall support for the PLAN as well as to propose how it could contribute to its implementation.

I am looking forward to continuing to work with you and other stakeholders to take PLAN S forward.

Kind regards,

Robert-Jan SMITS
Open Access and Innovation
Dear Robert-Jan,

Have a good weekend.

Sent from my iPhone

---

Dear [Name],

Thank you for your mail!

These figures are very impressive. I am very happy with this result and just forwarded me your mail.

Kind Regards.

Robert-Jan

Sent from my iPhone

---

Dear Robert-Jan,

Just a quick update on a successful PlanS campaign:

- The Editorial was viewed over 40K times from all over the world, see the article and impact metrics here: https://www.frontiersin.org/articles/10.3389/fnins.2018.00656/full
- We disseminated Plan S via our newsletter to 420K researchers. More than 105K researchers opened the email (this is good!) and we received lots of enthusiastic support and feedback for PlanS!
- The social media campaign reached over 420K people so far and got over 11K engagements and clicks.

Congratulations again on a very successful initiative!

Have a great weekend,
Dear Robert-Jan,

Good idea to catch up during the conference and would be pleased to see you for a quick catch-up discussion, if you have the time. One option would be at Frontiers, for example.

Hope to see you there,

Very best regards,

Robeti-Jan

Sent from my iPhone
Dear Robert-Jan,

asked me to send the below message on her behalf as she is currently on her way to

I hope it will find you well and that you will be able to join our event.

Kind regards,

From:

Dear Robert-Jan

On Nov 29th late afternoon (16:00-19:00), in collaboration with SwissCore and the Austrian Presidency, we are organising a Policy Symposium in Brussels, entitled 'Enabling the Open Science Modus Operandi in Europe'.

We foresee two sessions at the symposium:

1. How to transition to immediate open access swiftly and foster a transparent and competitive scholarly communication sector
2. How to embed open science in research assessments, incentives and rewards.

We would be delighted if you could come and speak about plan S in session 1, if this is possible?

I have attached the latest draft programme and an official invitation here for your consideration.

Please let me know if this is of interest and if you're able join the programme? We would be honoured to have you there.

My colleague can then be further in touch to organise.

Many thanks in advance,

Kind regards,

From,
Dear [Name],

Thank you very much for your kind invitation!

Unfortunately, I already have other commitments that day and therefore will not be able to participate.

I wish you a successful event.

Kind Regards,

Robert-Jan

Robert-Jan SMITS
Open Access and Innovation

European Commission
European Political Strategy Centre

http://ec.europa.eu/research

Dear Robert-Jan,

asked me to send the below message on her behalf as she is currently on her way to [Location].

I hope it will find you well and that you will be able to join our event.

Kind regards,

Robert-Jan
Dear Robert-Jan

On Nov 29th late afternoon (16:00-19:00), in collaboration with SwissCore and the Austrian Presidency, we are organising a Policy Symposium in Brussels, entitled ‘Enabling the Open Science Modus Operandi in Europe’.

We foresee two sessions at the symposium:
1. How to transition to immediate open access swiftly and foster a transparent and competitive scholarly communication sector
2. How to embed open science in research assessments, incentives and rewards.

We would be delighted if you could come and speak about plan S in session 1, if this is possible?

I have attached the latest draft programme and an official invitation here for your consideration.

Please let me know if this is of interest and if you’re able join the programme? We would be honoured to have you there.

My colleague Laure can then be further in touch to organise.

Many thanks in advance,

Kind regards,

Frontiers EU Liaison Office - Rue du Luxembourg 22-24 1000 Brussels – Belgium
Phone: [Redacted]
Email: eu.office@frontiersin.org