



Council of Editors of Learned Journals

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To: U. S. Treasury, Office of Foreign Assets Control

From: Council of Editors of Learned Journals

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Marilyn Gaull, Chair, CELJ Committee on OFAC Editing Regulations;
Editor, *The Wordsworth Circle*, New York University

Tani Barlow, Editor, *positions: east asia cultures critique*, University of Washington

Roy Flannagan, Editor, *Milton Quarterly*, University of South Carolina, Beaufort

Thomas Long, Editor, *Harrington Gay Men's Fiction Quarterly*,
Thomas Nelson Community College

Patricia Shields, Editor, *Armed Forces and Society*, Texas State University, San Marcos

On behalf of the Council of Editors of Learned Journals, representing 430 editors of scholarly and literary peer-reviewed journals in thirteen countries, we are writing to express our support of the position adopted by the Association of American Publishers (AAP) respecting the Iranian Transaction Regulations as interpreted by the Office of Foreign Assets Control (OFAC) (see AAP letter of 23 January 2004, "OFAC's Interpretation of IEEPA's 'Informational Materials' Exemption"). We are writing, moreover, to express our own concern over the implications of these regulations for our work, our readers, authors, and disciplines.

As we understand the interpretative guidance that OFAC has issued in a series of letters to publishers, we would require a license to publish, translate, and distribute literary and scholarly information in Iran, and we would be prohibited from editing or altering works submitted for publication from Iran that we publish in America.

Among our concerns:

1. As nonprofit publications, largely academic, with a mandate to serve communities of knowledge and art that override political and ideological boundaries, we do not believe that we can comply with these regulations and still retain our objectivity and serve our readers.
2. In the absence of information concerning enforcement of procedures and procedures themselves, editors need to know how they will be held accountable, and to be able to judge when regulation might inflict intolerable losses on scholarship.
3. We believe that the regulations are counter-productive, that being prevented from editing materials accepted for publication we would become instruments for disseminating false information, propaganda, and ideologies.

We hope you will consider revising these regulations and lifting this shadow from our work. Do they really mean, as one of our members commented, that we would be jailed for adding a comma?