

How Little is Enough: U.S. End-Use Monitoring and Oversight of the Weapons Trade

By Fleur A. Burke, Scoville Fellow, and Rachel Stohl, Senior Analyst

WHEN THE UNITED STATES BEGAN air-strikes in Afghanistan in October 2001, U.S. planes were threatened by Stinger missiles that had been provided to the mujaheddin by the United States in the 1980s. Since at least the mid-1990s, the use of legally exported U.S. weaponry to bomb and burn Kurdish villages in south-eastern Turkey has been documented. Turkish forces have also used U.S.-supplied light weaponry in specific human rights violations, ranging from torture to indiscriminate firing on civilians.

These examples are shocking. But, unfortunately, given the U.S. end-use monitoring (EUM) system currently in use, the United States cannot predict where American weapons will end up or how they will eventually be used.

While the United States has some of the most comprehensive export control and end-use provisions codified in law, current efforts to monitor U.S. arms exports are insufficient. Today, EUM is centered on an initial license application review, which ensures that U.S. weapons are exported to certified end-users, but does not place a similar emphasis on what happens to those exports once they are shipped. That means that countries with worrisome human rights

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records, evidence of poor weapons security management, and those that have active terrorist groups operating within their borders, still receive U.S. weaponry.

Internationally, a divergence between U.S. laws and those of allies and trading partners has reduced the effectiveness of U.S. EUM efforts. Recent efforts to “reform” U.S. export control policy, such as the Defense Security Trade Initiative (DTSI), pose challenges to effective EUM.

What is End-Use Monitoring and Why is it Important?

Weapons, by their very nature, have a potential to threaten, harm and kill. But not all weapons are the same. Nuclear, biological and chemical (NBC) weapons, known as weapons of mass destruction (WMD), can af-

fect vast numbers of people, but are rarely, if ever, used. Conventional arms, by contrast, are used in a majority of military actions. Conventional weapons encompass all arms used by military forces excluding NBC weapons. Each type of weapon is under the oversight of various U.S. government departments.

While the need for EUM of purely military items may seem obvious, dual-use items such as certain types of guns and high-speed computers have both military and civilian applications and should also be monitored. Further, some dual-use items, which have legitimate commercial applications, can be critical in the manufacture or use of conventional weapons or the development of WMD.

The United States is the largest arms exporter in the world – exporting \$18.6 billion in weapons, more than 50 percent of all global arms transfer agreements, in 2000. U.S. laws require the U.S. government not only to approve weapons sales, but also to monitor how defense-related exports are sold, who the recipients are, and how these exports are used – all of which constitutes EUM.

EUM is conducted to varying degrees by different U.S. government departments, each of which is re-

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sponsible for specific aspects of the arms trade. The problem, as has long been argued by many inside government as well as in the non-governmental community, is that the active application of these verification measures is woefully insufficient.

Current Challenges of U.S. EUM

Renewed focus on export controls and EUM has been in direct response to recent technological advances in military and dual-use items and to new trends in the commercial market, both of which have had an impact on recent congressional debates. While most members of Congress agree that EUM is necessary, they do not agree on what that scope should be, especially with regard to dual-use exports.

Legal responsibilities for EUM reside in several sections of the U.S. Code, and result from a variety of legislative efforts. The State Department, Department of Defense, and Commerce Department all play key roles in the U.S. export system, as well as the EUM process. EUM requirements are largely aligned with the licensing authority of each department. Nonetheless, the department that typically grants a license for export is not necessarily the department that is responsible for the entirety of its EUM program.

International Implications of U.S. End-Use Monitoring Policy

American EUM policy affects U.S. relations with other countries. A divergence between U.S. laws and those of allies and trading partners has an influence on the effectiveness of U.S. EUM efforts. An analysis of

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a small sample of key European governments, often considered close U.S. allies, reveals that EUM procedures for defense-related exports in many European countries have been discounted as inadequate, especially in comparison to U.S. laws. However, a common EU effort undertaken in the last few years, the EU Code of Conduct on Arms Exports, was designed to create a less laissez-faire and more morally responsible standard for arms transfers. The Code has far to go in improving EUM when it comes to U.S. transfers, however.

Four important factors limit the international effectiveness of the U.S. EUM laws. First, the falsification of official end-use documents is a problem for accurate EUM. In several instances, countries or senior individuals within governments have supplied these documents for illegal arms trade transactions. Second, problems arise when a country is accused of non-compliance with U.S. export laws, but the United States fails to invoke these laws in response. Third, disagreements with U.S. allies over EUM and state sovereignty often arise from EUM stipulations, including the requirement that American personnel be allowed to physically confirm that an export is in a country's inventory. And fourth, the challenge of global arms availability

continues to limit the effects of U.S. EUM. Regardless of diverse U.S. efforts, unilateral EUM can only have a limited effect on an unregulated international system, where defense and dual-use goods are widely available and in constant demand.

Bilateral agreements also impact EUM effectiveness. The most recent and far reaching bilateral effort is the Defense Trade Security Initiative (DTSI). It is the first major post-Cold War adjustment to the U.S. defense export control system. Announced at the May 2000 NATO meeting, the initiative introduces 17 changes to U.S. export regulations. The crux of DTSI "reforms" are a range of flexible licensing vehicles established primarily for NATO countries, but also including Japan, Australia, and Sweden. These licensing "reforms" would provide "one stop" streamlined licensing instead of the more rigorous and burdensome regime of multiple licenses. DTSI has to be negotiated bilaterally with each interested eligible country. The United States has not successfully convinced any foreign governments to sign on to DTSI. While the Bush administration has expressed support for DTSI, progress has been very slow since the initiative was introduced late in the Clinton administration.

DTSI poses many challenges to effective EUM. First, the explicit goals of DTSI—to expedite licensing and approval of direct commercial sales (DCS)—place an emphasis on the quantity, instead of the quality, of license processing. Since the current EUM system heavily relies on pre-license verifications, reducing the amount of time it takes to process an application without enhancing end-use provisions would have a pro-

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Under Attack! U.S. Arms Export Controls Targeted on All Fronts

By Tamar Gabelnick, Director, Arms Sales Monitoring Project, Federation of American Scientists

OVER THE PAST FEW YEARS, the U.S. arms export control system has been the subject of criticism and a campaign is now being waged by industry, some pro-industry think tanks, and the Pentagon against what they believe to be inordinately high levels of regulation on U.S. arms exports.

Criticism has centered upon the length of time it takes to get export licenses for weapons and technology transfers. Industry argues that long delays cost them overseas business opportunities, including the ability to team up with foreign companies in joint development projects. The Pentagon adds that current controls impede interoperability with allies.

Absent from these complaints is a recognition of the serious foreign policy and national security reasons for having a careful, if sometimes lengthy, licensing process. Nor have critics made a sound case about how speeding up the export process will help improve the U.S. already dominant place in the world market, or why it is the American government's responsibility to make this a priority.

In a report issued in August 2000, the General Accounting Office (GAO) stated that the Pentagon has not shown how changes to the export control system would improve interoperability with allies. The report also provided a case-by-case rebuff of the examples industry and the Pentagon used to advocate for changes to the export control system. For example, widely cited delays in licenses for exports to allies during the war in Kosovo were actually due to mistakes made by the exporting companies.

What remains clear is that any attempts to significantly weaken export controls could further prevent the U.S. government from ensuring that U.S. weapons and technology will not be used by abusive or aggressive states or diverted unwittingly to potential U.S. adversaries. The need to be vigilant is all the more

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urgent after the events of Sept. 11 which demonstrated the wide number of potential aggressors the United States faces and the unexpected uses they can make of U.S. arms and technology.

Licensing Time

Since criticism has largely focused on the time it takes U.S. officials, especially in the State Department, to process arms export licenses, the initial focus of reform was on average licensing times. Under the leadership of David Oliver, then deputy undersecretary of defense for acquisition and technology, the Pentagon reduced the average time for license reviews in the department to 10 days. Strict deadlines were imposed

to ensure that license reviewers did not take too long to make decisions. (Critics were assured that these limits would in no way interfere with a proper appraisal of the license request.) The State Department moved to decrease license review times by doubling the number of licensing officers in the Office of Trade Controls, where 40,000 licenses are processed and reviewed every year. (The GAO later reported that the State Department is actually processing licenses at about the same rate as the Commerce Department, though State handles four times as many licenses with half the staff as Commerce.)

Defense Trade Security Initiative

But faster licensing was not enough to satisfy the demands of weapons exporters. In the spring of 2000, the Defense Department – industry's strongest ally in the administration – pushed through a series of more comprehensive changes to the export licensing system, called the Defense Trade Security Initiative (DTSI). The policy changes ranged from creating new export licenses for entire weapons systems to expediting license reviews for NATO members, Japan, and Australia. The most far-reaching DTSI reform, however, would be to exempt favored allies from most arms export license requirements. The initiative was touted as a way to *prevent* weapons proliferation by offering a "carrot" (license-free U.S. arms exports) to allies in exchange for their adoption

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of U.S. best practices in areas like limiting arms retransfers, protecting weapons technology, and controlling arms brokers.

The State and Justice departments were originally very critical of the license-free arrangement. State argued that it would weaken its controls over arms exports, and that from a foreign policy perspective it would create a tiered system of allies that could damage bilateral relations. Justice feared it would lose the ability to track and prosecute violators of the Arms Export Control Act because there would be no paper trail. These concerns were not without foundation: a long-time license-free arrangement with Canada had to be suspended in 1999 after the discovery that U.S. equipment and technology had been smuggled to Iran, China and Pakistan. A GAO report released in March 2002 makes it clear that there are many more lessons from the Canadian experience that should be considered when negotiating future license-free arrangements.

Security conscious members of Congress were also wary, suspecting that the Pentagon was more interested in expediting sales to allies than seeing an improvement in foreign nations' export controls. In October 2000, Congress passed the Security Assistance Act of 2000, which requires states to sign a binding bilateral agreement committing them to adopt a number of specific export standards before they could be eligible for license exemption status. Congress' foresight paid off. The Pentagon has since signaled that it would like to limit the list of originally articulated standards in

order to speed up stalled negotiations with the United Kingdom and Australia, first on the list to receive a license exemption.

U.S. Munitions List

DTSI also required that the U.S. Munitions List (USML) – those items requiring a license from the State Department for export – be reviewed in cycles of no more than four years. The goal of this provision was to cut down the number of items requiring an export license, ostensibly to focus attention on those technologies that most need protection.

DTSI stipulated that the list be brought into line with the Defense Department's Military Critical Technologies List, which defines those technologies that are most critical to U.S. security or that are unique to U.S. capabilities. The Defense Department asserts that its primary strength revolves less around hardware and more on system integration and technical skills. In other words, the U.S. government should "build higher fences around smaller yards."

The Pentagon now appears to be charging toward this goal. According to a source in the State Department, the Pentagon has proposed taking off the USML most spare parts for aircraft, as well as utility helicopters. Yet many of the criminal cases on review at Customs for violations of the Arms Export Control Act are for spare parts. (For example, in December 2000, Customs charged two persons with conspiring to smuggle F-14 spare parts to Iran and F-5 and F-4 parts to unknown states.) The Pentagon is proposing to decriminalize these types of violations, or at least to move them to Commerce's list of controlled items, which receive less

priority for criminal investigation. This would be good news for the Iranians of the world that are in desperate need of spare parts for their aging U.S.-origin equipment, but potentially bad news for the U.S. military that might face renewed threats.

Taking Things Further

Many people in the defense industry, and even within the administration, still believe that the current export system is broken and in need of major repairs. Not only do these agents fail to make a compelling case for an impending implosion of the system, however, but the drastic remedies they propose are also disproportionate to the problems they identify.

Industry

The defense industry, with the most to gain from weakened export controls, has been at the forefront of attacks on the current system. Harping on a few examples of long lag times for export licenses (the ones discredited by the GAO, see above), the industry is making increasingly strident demands for change.

In March 2001, the Aerospace Industries Association (AIA) released a set of proposed legislative and administrative changes to the export control system – such as limiting congressional notifications, loosening rules on third country transfers, cutting the U.S. Munitions List, and increasing export license waivers – "to allow U.S. companies rapid access to the international market for their products and services," and for non-American companies to team up with U.S. firms without worrying about "the extraterritorial reach of U.S. regulations." Current AIA newsletters still list reforming "U.S.

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export laws, regulations, and their administration” as one of the association’s top 10 goals.

The American Institute of Aeronautics and Astronautics (AIAA) also stresses the links between globalization and export reforms in its “Blueprint for Action,” based on an AIAA Defense Reform conference held in February 2001. Among other suggestions, it proposes “streamlining the export license application and approval process” and encouraging the sharing of technology between U.S. and European firms.

The latest place for industry input is the congressionally mandated Commission on the Future of the U.S. Aerospace Industry, due to put out a final report this fall. Among many other industry representatives, the panel includes the presidents of Lockheed Martin and the AIA. In its second interim report released in March 2002, the Commission recommended accelerating implementation of DTSI and “modernizing” the Defense Export Loan Guarantee program by reducing its fees and regulations.

CSIS

The Center for Security and International Studies (CSIS) has also put itself at the forefront of the “reform” debate. Now head of CSIS (and also on the Aerospace Commission, see above), former Deputy Defense Secretary John Hamre is advocating even more radical ideas than he could get into the DTSI. In May 2001, CSIS released a report entitled “Technology and Security in the 21st Century: U.S. Military Export Control Reform,” which advocates a

complete overhaul of the U.S. export licensing system, closely echoing reform proposals put forward by the defense industry. The report complements a congressionally mandated study on multilateral arms export controls written by CSIS and the Henry L. Stimson Center, which also calls for fundamental changes to the U.S. export control system.

The CSIS report asserts that U.S. national security would actually be *strengthened* by reducing controls on U.S. weapons and technology transfers. CSIS argues that innovation in the defense industry – which is critical to U.S. security – would best be stimulated by increased cooperation with European partners. And in its view, increased cooperation depends on facilitating the export of technology to a much greater extent than allowed for by even DTSI.

The CSIS report assumes that globalization makes the spread of weapons and technology inevitable, and claims that the United States will miss out on valuable sales opportunities if it tries to unilaterally promote restraint. The CSIS report proposes an alternative system where the defense industry would be granted permission to conduct most exports without a license, subject to government audits and oversight. This proposal comes at a time when several major arms exporters, from Lockheed Martin to Loral, have been under investigation for breaches of the Arms Export Control Act, including the transfer of weapons technology to China.

CSIS also suggests that arms that do not pose risks to national security should no longer be on the U.S. Munitions List. Indeed, the report contends that “the only export controls that make sense are those that are

both effective and critical to our national security.” Such a policy would abandon a long-standing, bipartisan view that the U.S. government should not sell weapons likely to be used as tools of repression or contribute to carnage in regional conflicts, even if U.S. national security is not in question. For instance, small arms and light weapons are low-tech and commonly available, but remain favored weapons of abusive governments and military forces.

CSIS also recommends limiting the requirement for foreign states to seek U.S. government permission to re-export U.S. weapons or technology to only those cases where U.S. content is above 25 percent or the weapon is considered “Significant Military Equipment.” Unless U.S. permission for re-export is always required, however, there will be instances of U.S. arms and technology ending up in the hands of governments that could not get it directly from the United States.

The report also recommends weakening the informal congressional notification process, which it finds too long and opaque. But this longer process of consultation with congressional staff helps ensure that potentially embarrassing debates about the reliability of the end-user are kept confidential. It also enables real congressional input, since the 15-30 day period to formally oppose a sale is entirely too short to pass a congressional resolution opposing a sale.

Prognosis for Change

Though some of the above recommendations date back a year or more, they continue to inform the debate on export controls. The only impact Sept. 11 seems to have had

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on the issue is to temporarily slow down the processing of reforms in the administration due to the diversion of resources to other tasks. But there appears to be no recognition that the increased risk of terrorism means that export controls should be preserved or strengthened, not further weakened.

On the contrary, the Bush administration is promoting policy changes that would undermine the government's ability to limit the proliferation of arms and technology that could be used by terrorist groups or hostile nations. Demonstrating a fundamental lack of appreciation for the usefulness of export controls, Bush

administration officials have given speeches to the defense industry that stress the need to "reform" export controls, buying into the argument that U.S. national security actually depends on these changes.

In fact, reports reveal that the National Security Council has been debating far-reaching changes, including dismantling the Office of Defense Trade Controls, thought to be the finger in the spokes of the export control wheel. The administration has also recently changed the rules on the export of Unmanned Air Vehicles (UAVs) in Category I of the Missile Technology Control Regime (MTCR) from a presumption of denial (as required by the MTCR) to decisions on a case-by-case basis, despite the fact that they could be

used to transport weapons of mass destruction. The administration also supports the Senate's new version of the Export Administration Act – governing the export of goods with civilian and military uses, including high-speed computers used to design nuclear weapons – that would significantly reduce the export controls on such items.

In the end, the administration needs to show greater awareness that U.S. export controls play a vital role in protecting U.S. national security and foreign policy goals. With 50 percent of the global market and a recent boom in U.S. procurement, the health of the defense industry is not at risk. What is at risk is the security of Americans, who could end up paying the price of weakened controls. ■

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foundly negative effect. Second, by making no provisions for EUM and reducing the control the United States has in trying to prevent unauthorized use, DTSI constitutes a severe weakening of U.S. EUM provisions, and of U.S. export control laws in general. A glaring problem, as revealed by ongoing Office of Defense Trade Controls investigations, is that legal exports to many of the same NATO allies set to benefit from DTSI's changes are being illegally diverted to countries that would not have access to these items directly from the United States.

Conclusion

U.S. and international receptivity to deepening and broadening interna-

tional regimes in the pre-Sept. 11 world was remarkably different than today. The terrorist threats manifested by the events of Sept. 11 have brought the need for strong international cooperation on monitoring dual-use and weapons transfers into perspective. The current environment may encourage resistant governments to embrace functionally enhancing international regimes such as the Wassenaar arrangement. The United States would benefit from a global EUM system that is much more advanced than those regimes that currently exist, one that reflects the significantly higher standards of U.S. export and end-use regulations.

In creating more effective regimes, the United States has an opportunity not only to export its best practices, but also to use its leader-

ship to help shape these new or enhanced regimes. An effective U.S. EUM system, in coordination with harmonized, internationally binding standards, could establish a system that successfully addresses the issues that necessitate EUM, such as preventing arms transfers to inappropriate end-users (including human rights violators and terrorist groups) or to countries or regions mired in conflict. ■

For more information on end-use monitoring, including specific recommendations on how to remedy some of the U.S. system's failures, please see the recent CDI publication "How Little Is Enough?: U.S. End-Use Monitoring and Oversight of the Weapons Trade" available to read and order on the CDI website at <http://www.cdi.org/pubs/>

Center for Defense Information and Federation of American Scientists Joint Defense Export Reform Project

By Rachel Stohl, Senior Analyst, CDI, and Tamar Gabelnick, Director, Arms Sales Monitoring Project, FAS

PART OF THE U.S. POST-SEPT. 11 strategy to stamp out terrorists and their networks entails providing U.S. weapons as quickly and efficiently as possible to those who support this mission, even if those countries have been ineligible to receive U.S. weapons in the past because of human rights violations, lack of democracy, and even previous support of terrorism.

While the Bush administration has backed off its first proposal to waive virtually all export controls for five years, the United States is committed to arming potential allies in the war against terrorism with U.S. weapons as quickly as possible.

This attitude has direct consequences on the efforts already underway to “reform” the entire arms export control process (see “Under Attack! U.S. Arms Export Controls Targeted on All Fronts” on page 3). In fact, the Sept. 11 attacks have provided additional ammunition to the calls for “reform.” The CEO of Lockheed Martin, Vance Coffman, told reporters on Sept. 27 of the importance of changing the arms export process. “In the wake of the events of Sept. 11, it is incumbent upon all of us to develop tools to enable the strongest possible systems and military coalitions to fight this global war against terrorism,” he said.

This sentiment is evident in the Bush administration’s willingness to offer U.S. weapons as part of a *quid pro quo* for countries joining the coalition, assisting with intelligence gathering, allowing the use of bases and airspace, as well as otherwise

demonstrating support for U.S. counterterrorism activities. Current export controls, which often are accompanied by lengthy review processes, are viewed by many in the administration as an impediment to providing these types of security

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assistance. They are not, on the other hand, given due recognition for their value in preventing the spread of U.S. arms and technology to terrorist groups. Current reform proposals include expediting the licensing process for arms exports to a select group of countries, as well as decreasing the military hardware included on the control lists.

Those concerned with diligent oversight and scrutiny of U.S. arms exports and the entire licensing process are concerned what this effort to dissect export controls and arm the world will mean. To examine these trends further, CDI and the Federation of American Scientists are undertaking an arms export reform project. Under the leadership of CDI Senior Analyst Rachel Stohl and FAS Arms

Sales Monitoring Project Director Tamar Gabelnick, the goal of the project is to take the defense export reform debate beyond the rhetoric provided by the Bush administration and defense industry (that reform is needed quickly and arms export criteria should be loosened.) Targeted at the administration and Congress, as well as the media and public, the project will produce a volume of material that examines the reform debate and details the effects of this debate in view of this new security framework.

Topics included in the volume, which is slated for a winter 2002 release are: why export reforms are still being emphasized in the post-Sept. 11 world; investigation into the unparalleled support for the defense industry; the use of arms sales to create coalitions; security risks of proposed changes to export control; links between loosened export controls and contributions to foreign policy problems; the impact of reforms on congressional oversight; strengths and limitations of current international standards and controls; and alternative reform proposals.

A conference discussing the report’s findings and recommendations will follow the publication of the volume. Participants in the conference will include the authors, key policy staff (both in the administration and on the Hill), the media, and other non-government organizations. A press conference will also be held upon the report’s completion. ■



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