BY MR. BARON:

Q I would like to ask you a few questions that are raised by your answer on some things you said in response to my last question.

The first is what degree of control do you have over the documents which are in your files at the LBJ Library?

A I have access to them, but I have not the power to declassify any that are still classified. That is Point 1.

Point 2 is there are no documents in my files except perhaps personal letters and that kind of thing that are not also in the LBJ Library files. What I have got is the flow of documents that went up to the President from me in that period. We are now talking about that period in my service.

Q When you say "What I have got", do you mean those are in your files or in the LBJ Library files which bear your name? I am trying to get a sense of --

A I understand. It's a very good, clear question.

I have under lock and key in the LBJ Library documents that are really my chronological file for the period that I served in the White House, which
was from the 1st of April 1966, down to noon on
January 20, 1969.

I also have, I think, files of a similar kind
for my period of service in the White House under
President Kennedy. Actually it was January 21, 1961
to sometime in December 1961, when I went to the State
Department.

To the best of my knowledge, there is nothing
in my files that are not also in the President's files,
that is to say, because I was sending documents to
the President.

I received at the other end, the originals
are at the other end and I have got Carbons.

My papers are locked up, but I have access
to them. I cannot give that access to anyone else.
Everything that went to the President is, of course,
in the files of the LBJ Library under the control
of the U.S. government. The archivists and the GAR,
whoever has supervision of the library and the clearance
procedures under the controls of the Executive Branch
as at any given moment in time.

Does that answer your question?

Q I think so. I want to focus now on
the files which you referred to as being under lock
and key at the LBJ Library, but which are your files, your chronological files.

A That's right. I have access to those, but I have no access to any classified documents in the LBJ Library itself.

Q I understand that.

A Okay.

Q I am focusing now on your chronological files.

A That's right.

Q Is it fair to say those are your files which repose in the LBJ Library?

A Correct.

Q But they are still your files?

A That is correct. I am committed to turn them over in the fullness of time along with my academic --

Q But you still maintain control over those files?

A I have access to them. I have access to them, which is the proper way to put it. I don't control their location or care. They are under professional lock and key in a library, in a vault somewhere, but I can have access to them, yes. I cannot transfer that access.
Q Are you forbidden to transfer that access in response to a lawfully issued subpoena, if you know?

A I do not know, but I believe the procedure would be as follows: That I would turn these over to the archivists who would be responding -- they have already been responding to a general subpoena and they would go through the documents, pick out documents whereunder the terms of the subpoena they judge to be relevant and then they would forward those for clearance to the proper authorities in Washington.

But I would repeat, they already have those documents because they were Presidential documents that went forward. I mean, the chronological file consists primarily of communications with the President and there is more to them because when they are in the LBJ Library, because they would say, "Herewith, Mr. President, a cable from Bunker" or something. The attachment would go to the LBJ Library. I would have only the covering material that I may have attached to it, of which you have seen a great deal, as a matter of fact, the documents that have been cleared in the course of the exercise of the subpoena that was laid upon the LBJ Library.
Q You have made some references to what we have and what the archivists at the library have done.

What do you know that the archivists at the LBJ Library have done?

A Because once they are cleared, they are cleared for anybody. There is no way you can clear on a privileged basis. That is a flat rule which they have got to follow.

So when they clear, the copies are available to me or to anyone else who asks for them.

Q Have you requested the documents?

A Some of them. I have not seen all of them. I have seen some of them, yes.

Q When you say you have seen them, have you seen them in Austin?

A Yes. I have seen them in Austin.

Q When did you return to the United States?

A July 1, 1984.

Q It's your testimony that some of the documents which have been declassified in response to the party's subpoena to the LBJ Library, you have been furnished with copies of; is that correct?

A Yes. I have asked for them -- for some of...
them.

Q How did you make a judgment as to what to ask for?

A Well, for one thing, I wanted to see what documents of mine have now been cleared. The ones that I sent forward with my name on them. I wanted to know, indeed what I had written that have become part -- come into the public domain.

The reason I am not -- it's been episodic. I have been very busy since I got back preparing a new course and preparing to teach full time and coping with the mountains of papers that accumulated in a year's travel.

So I don't have a systematic -- I didn't have any single systematic criterion for getting these papers.

Q Is it correct that you asked to be furnished copies of anything that you had authored or prepared?

A I think I asked the library about that. The senior archivist on Vietnam, you know, anything that he thought I might be interested in and things that I might be involved in.

And there were certain things that I myself
Rostow

found in my own files that I put through a freedom
of information procedure and some of those -- these
took a long time, some even before I left, and they
had been put in the public domain.

So it's a scrappy -- it's not been a systematic
effort on my part to keep up with all the documents.
I am sure I have not seen them all because it's, as
you know, a massive -- they told me the number of
documents that have been cleared and they sent forward
to Washington. We are talking about large numbers
here.

(Continued on next page.)
Q. What I am trying to get at here, what is the mechanism by which you receive any documents from the universe of documents which has been declassified by the LBJ Library for response to our subpoena?

A. Yes. Yes. I would say there are three sources. One of them is documents that have been -- that are now cleared for any scholar, that I have asked for at certain times.

Secondly, documents that earlier I had -- I myself had taken the initiative and asked that they be put through the Freedom of Information Act for clearance. That was before I left.

And I don't know -- I think the Capital Legal Foundation has sent me some documents.

So that the volume of documents -- of now cleared documents have come from those three directions.

Q. When you say, with respect to the first group, that you asked for certain documents, whom did you ask?

A. The -- one of the archivists at the LBJ Library who works on Vietnam.

Q. One in particular?

A. There are several -- well, there are two people
there that I have kept -- one is a man named David Humphries. There is also a man who does not work for the library, who works for the LBJ Foundation, who collects unclassified materials on Vietnam, named Ted Gittenger. Ted is building up the Vietnam collection on unclassified material, no classified material.

Ted has kept an eye out for things that he thought might be of interest to me. I tried to be helpful to him out of my experiences and suggesting people whom he might interview and so on, before they are not available. So I have had a reasonable -- seen a reasonable sampling of the documents that have been cleared.

Q Have you had any conversations with any of the archivists or any other personnel at the LBJ Library who are involved in the production of documents by the LBJ Library in response to our subpoena?

A Would you repeat the question?

Did I ever talk to them?

Q Since that subpoena was issued -- and that would be in early December of, I believe of 1982, and that subpoena is still in force and still is in the process of being responded to.
A That's right.

Q Have you spoken with any of the archivists or other personnel at the LBJ Library who are handling the -- any aspect of the production?

A I have spoken to them about what, may I ask?

Q About the production.

A About the response to the subpoena?

Only with respect to the scale -- I have never asked them about the procedure, you know, what they are sending forward or what they have indicated -- I asked about the order of magnitude and the number of documents that they found relevant.

And I forget the number, but the number astonished me by the scale and -- but I have not gone in at all to their professional procedure in selecting documents and sending them forward.

Q Were you asked by any of those personnel, to whom you referred in my last question, to direct their attention to files to give them any information about where documents responsive to the subpoena might be located?

A Never. I was never asked and I would add these were true experts on information in that library about Vietnam, so that they would not ask me or
anybody else.

There is nobody that knows better than they
where the documents are.

Q You spoke earlier of a document that
General Westmoreland had sent you when you were working
on "The Diffusion of Power."

A Mm-hmm.

Q That document -- is that document part
of your files or part of the LBJ Library's files?

A It's a part of the open materials which will be
turned over.

I have written about a dozen books since leaving
the government. Each of them has many drafts, the
raw materials, et cetera.

Somewhere in the vast amount of these raw
materials for this eight, nine hundred page book,
"The Diffusion of Power," Westy sent me.

If you want to know what he sent me, I think
it's the full text of his book on this period because,
as I remember, he gives a full account of this April
1967 meeting. And I paraphrase or use it. I forget
which.

You want to know where that piece of paper is?

It's not in my classified files at all. There is
nothing classified about this piece of paper.

It is in the backup materials relating to "The Diffusion of Power" because each of my books, they are being, I think, extraordinarily compulsive. They are keeping all of the drafts and a lot of the raw materials. They are generating an awful lot of paper from the Walt Rostow file, but that's where -- it would not be in the chronological file. It would be in the classified.

Q That is in part of the files that are your files as distinguished from the LBJ Library files, but which they maintain for you?
A They don't maintain those. They do not maintain the unclassified materials which will ultimately come to them. Those are maintained by Ms. Lois Nivens, who is my secretary.

Q Now, those files are then truly your files, they are not only -- not only, that is -- do you have access to them, but you maintain them and have control over them; is that right?
A That is correct.

Q Have you undertaken a review of those files in response to the subpoena served upon you by CBS?
Rostow

A

No, because the only part of those files that would be at all relevant are in the book "The Diffusion of Power," which I published. There would be no material relevant there that is not part of the published record. There is nothing that is relevant to that case -- relevant to the subject matter of the Westmoreland CBS case that isn't in "The Diffusion of Power" itself, and which -- so I have not reviewed that material.

I did send for, at my own initiative, to Mr. Crile, Mr. Wallace, after I was interrogated, quite a lot of material including pages from "The Diffusion of Power" that I thought would be helpful to them as well as advice as where else to look for further information—for example, to interview Ambassador Bunker and Mr. Komer.

Q Dr. Rostow, you are a historian; correct?

A Yes.

Q You understand that there is a distinction between what could generally be called original source documents and a historical compilation of documents, recollections, interpretations, such as your book "The Diffusion of Power." You understand that
distinction, don't you, sir?

A I do, indeed.

Q What I am suggesting to you, sir, is that there is material in the files on which you relied and the materials on which you relied in preparing "The Diffusion of Power" which may not be reproduced verbatim in "The Diffusion of Power."

Is that a proposition that you would agree with?

A It is quite possible, yes, and either that material, the material that you are referring to, the primary -- the material to which we are referring, the sort of prime raw materials which were used in that book were of two types: Type one, open material which is annotated in the normal way of the scholarly work -- I don't know, I have not added up all the pages and notes, but they are ample.

Secondly, I used my own chronological file, my personal file, and used certain documents in the draft of the book and then sent -- when I wanted to use the document that was hitherto classified, I sent the document and, indeed, the book as a whole down to be read by authorities in Washington to make sure that the materials I use were, in effect, capable of
declassification, capable of use without damage
to the interests of the U.S. government.

And as I say, those documents where I used
hitherto classified documents and got them cleared
in Washington, those documents, so far as the period
we are talking about, are in the President's file also
and have been subjected to your subpoena.

There is a lot more about Vietnam in that
book if you have ever looked at it.

(Continued on next page.)
Q I am trying to get whether there is some reason why you have not undertaken a review of your files to respond to the CBS subpoena.

I understand that "The Diffusion of Power" is on the bookshelf. But there are other materials, whether they be your notes for "The Diffusion of Power" or the original source materials that you collected to put "The Diffusion of Power" together, or other materials which may have related to other books or which may not ultimately have been used in connection with the book, but which are in your files. Do you understand what I am getting at?

A I understand what you are saying, and the answer is that the only materials that bear on in the broadest way -- on the subject of this case, to which I had access from my own files that are not annotated or open, from open sources, are documents that are also in the regular LBJ files and I was not about to try to do the job that the LBJ archivists have done professionally on a massive scale because it would have been redundant and besides which I was heading out for a year abroad.

Q You have been back from that year abroad now for several months.
A: I certainly have.

Q: Your counsel, I think, will advise you that you have an independent obligation to furnish whatever documentation you may have that is responsive to the terms of the subpoena, irrespective of whether that documentation is available to us or to anyone else from another source.

Has your counsel advised you of that effect?

MR. MURRY: Objection; and instruct him not to answer.

Q: Do you understand that you have that obligation, sir?

A: I understand what you are saying.

Q: I am asking you if you understand that you have an obligation to furnish any documents that are in your own files which are responsive to the terms of the subpoena that was issued to you irrespective of whether we can get those documents somewhere else or irrespective of whether you think we can get those documents from somewhere else.

A: Yes.

Q: And you have not discharged that obligation, have you, sir?
MR. MURRY: Objection. You may answer.

A. I discharged it immediately upon being interrogated by CBS by giving them a great deal of material relevant to their questions.

I have gone through my files and asked for declassification procedures. Documents that I thought might be of interest and there is -- some have been turned down and some have been declassified and available to counsel on both sides.

Q. Dr. Rostow, you were interviewed for the CBS broadcast in 1981; correct?

A. That is correct.

Q. This litigation was commenced on September 13, 1982.

If you don't know that, I will represent to you that it is true.

A. I accept that.

Q. The subpoena that was served upon you was served upon you sometime in 1983, according, I believe, to your earlier testimony; correct?

A. Just before I left, that's right.

Q. Your legal obligation to respond to that subpoena arises upon the service of that subpoena upon you.
What you may have done prior to the commencement of this litigation and prior to the service of the subpoena upon you, do you understand that doesn't constitute a response to a subpoena that was served upon you in 1983, what you may have pulled out of your files in 1981?

A. After the service of that subpoena, I was directly in touch with counsel for CBS. It was explained to them what my situation was, that my wife and I were about to take off on a year's leave of absence.

The only issue that was raised with me was where and when I would make myself available to counsel for CBS for a deposition.

I explained my schedule and there were three options. One was in Serbelloni, Bellagio, Lake Como, Italy which we discussed. The second one was Oxford and the third was Paris.

The only issue raised in the exercise of its rights under that subpoena by counsel for CBS was to arrange the deposition in Paris and I having discussed all this with openness and tried to make myself available to counsel for CBS, giving them options any time they wanted to get me, they could get me.

CBS never said, "You have an independent
obligation to go through your files no matter what
is in the President's files" and that was my under-
standing of the de facto obligation I had to CBS and
I lived up to it.

Q Have you ever asked your counsel to
explain to you the nature of your legal obligation
having been served with a subpoena?

MR. MURRY: Objection and instruction
not to answer.

Q Is it your testimony that you don't
understand the nature of your obligation to produce
documents in response to the subpoena?

A I understand the language of that, yes.

Q But you have not made any effort?

MR. MURRY: Wait. Let the witness
finish his answer, please.

A I did make an effort before I left. I went
through my own files and suggested and asked for
declassification of certain documents under the
Freedom of Information Act, which I thought might
be -- bear on the case that were then classified.

I did go through my files, but that I thought
fulfilled my obligation under the subpoena and the
subpoena came later, of course.
I made sure that before I left I had gone through my chron file on my own and I asked for a certain number of documents hitherto classified under the Freedom of Information to be declassified and since my files were essentially duplicatory, I thought that fulfilled my obligations, sir.

Q There is also unclassified material in your files, is there not, sir?

A Well, I tried to explain to you two sets of files. One is the formal file of my time in government. The second is perhaps excessively dignified to be called a file. We have some boxes that have not yet been sorted out, each relating to a book I have written and some of the raw materials and drafts and so on that have gone into that book are there.

I did not go through those unclassified documents because my sources are impeccably annotated in "The Diffusion of Power" and anyone, especially distinguished counsel for CBS, was quite capable of seeing the sources that were used that were not classified that might conceivably bear on all of this.

Q You did not go through any of those sources that were not classified to counsel for CBS in response to the subpoena, did you?
MR. MURRY: Classified or unclassified?

MR. BARON: Unclassified.

A I did not and I -- well, that's for someone else to judge. But I would have thought that if I annotated and indicated lucidly what unclassified sources I used in writing a book that was sufficient, for the state of education and sophistication of counsel for CBS.

Q Dr. Rostow, again you are a historian; is that correct?

A Yes.

Q Historians make judgments, do they not?

A Yes.

Q They introduce their interpretation of events and their interpretation of source materials into the accounts that they write; is that correct?

A I am not talking about my text. I am talking about sources. We talked about two types of sources; unclassified sources and classified.

On the classified sources, the important and orderly and correct and flowing legal procedures was used to assure if they were used in the text they were checked for being appropriate, indeed in effect...
declassified for that purpose.

On the unclassified sources -- I am not talking about opinion or interpretation, the sources were all annotated in the usual scholarly way.

MR. BARON: Off the record.

(Discussion off the record.)

BY MR. BARON:

Q. Do you recall when the first session of your deposition was conducted?

A. It was either late March or early April 1984.

Q. Since that time, have you reviewed any documents that relate to this litigation?

A. Yes. Yes, I have. I try to catch up. You must understand that after just about the time that the deposition was finished or shortly thereafter, I went -- which would take it down to -- let me see. I arrived March 8th, left April 8th. April, May, June, I lit out and I was -- and my wife -- in Northern Italy, Switzerland, the Soviet Union, Sweden, three places in Germany, Copenhagen, and back to Britain to go home July 1st. That was not an interval that would lend itself to a reflective view of documents.

I have tried, in addition to my other very serious responsibilities, full-time teacher preparing
new courses, getting the house in shape, to try and
catch up and review, you know, the collection of docu-
ments around my office, and especially, I think the
presentation of the materials in response to the CBS
case for summary dismissal.

I have looked at that material and seen recently
some declassified documents. So in that sense, yes,
I reviewed materials, but I would say rather more
in the last month than any other period since the
deposition.

Q Have you read the plaintiff's memorandum
in opposition to CBS motion for summary judgment?
A No. I have read the summaries of it, but I
have never read the -- oh, the plaintiff. Yes, I
read the plaintiff.

Q The plaintiff's memorandum in opposition
to CBS's motion for summary judgment.
A Yes. I have read that several times and gone
through the other materials less systematically, the
other two volumes. But I was never furnished,
unfortunately -- I have never been furnished by counsel
for CBS with their defendants' --

Q Did you ask counsel for CBS for a copy
of defendants' memorandum in support of their motion
for summary judgment?

A I don't recall ever asking for it. I will be glad to read it.

Q Is there any doubt in your mind that you have never asked defendants' counsel for a copy of the CBS memorandum in support of the motion for summary judgment?

A No. I don't think at any time.

Q Did you ask your counsel for a copy of that document?

A No, sir, I did not.

Q Do you know whether they have a copy of it?

A I don't know whether they have it. I assume they have a copy. I assume it's in the public domain.

Q Have you read any of the affidavits which were contained in an appendix submitted by CBS in support of its motion for summary judgment?

A Yes. Some of those affidavits I read in Paris. I assume they are the same ones. I read some of the documents that were -- the affidavits on the CBS side, yes, surely.

Q Do you recall the names of any of those persons?
Q Do you know whether you ever read the affidavit of a Colonel Donald Blascak?
A I don't remember his name.
Q No recollection?
A No recollection.
Q Have you read any of the deposition evidence in this case? The deposition testimony, I should say, that has been taken by both sides in this case.
A No. I have not read that. It's just too massive a body of material. I don't even have a copy of my own deposition in Paris.

There have been copies, for example, of Mr. McNamara's whole deposition that have been circulating and one of them found its way in the works of the LBJ Foundation not at the library and I have not even read that one. There is just too much to do.

Q Have you read the materials which were submitted, and by that I include affidavits and documents which were submitted in support of plaintiff's opposition to summary judgment motion?
A Yes. I read some of those. Well, what I really read most carefully was Volume 1.
Q Which is the brief?
A The brief. And I read selectively some of
the affidavits and I looked again more thoroughly,
I would say, at some of the documentary raw materials
that were mobilized for this occasion.

Q Who mobilized those documents for you?
A I don't know. I am referring to documents
that were formerly presented to the judge in response
to the CBS request for summary dismissal.

Q That would be the documents submitted
in the appendix, the document appendix?
A That's right.

Q That plaintiff submitted to the court?
A That's correct.

Q Have you read any of the documents
in the appendix which defendants submitted to the
court?
A No. I have not seen those.

Q Are you troubled at all by the fact
that you may not have seen a fair sampling of the
material on both sides of this case?
A I think I do understand the material on the
CBS side of the case. I have been subjected -- been
involved in this case since I went in the summer of
'81, I guess to be interrogated by these fellows and that was -- a lot of the alleged evidence was laid before me then and I now know a lot more about what the evidence is.

I wouldn't classify with you and Mr. Murry's experts on this case, but -- or a fellow who had to earn his living in a different manner -- I know more than I ever wanted to know about it.

In any case, I do not pretend to be a professional expert on all aspects of the evidence on both sides, but I think I understand pretty well the lines of argument on both sides.

Q Do you know who Colonel John Barry Williams is?
A No, sir.
Q Do you know who Colonel Gains Hawkins is?
A I heard his name more often, yes. I never met him.
Q Do you know who he is?
A Who is he now?
Q Either who he is now or what position he held at the time the events in this litigation took place.
A His precise position in the chain of command,
I don't know.

Q Have you read any of Colonel Hawkins' testimony?
A Yes, I did. I did at one time. I don't remember it very well. I remember the general tenor.

Q Do you know whether you read an affidavit or deposition testimony?
A I didn't read any deposition.

Q Do you know whether you read an affidavit from Colonel Hawkins?
A I think I read an affidavit in Paris of his, but I am not sure. I read a number of affidavits in support of the CBS position in Paris.

Q Have you read any of General Westmoreland's testimony given in the course of this litigation?
A I read passages that were referred to in the plaintiff's presentation of his case. I read newspaper accounts of his press conference after the showing of the CBS documentary. But I have not -- I don't believe -- I have never seen his deposition.

Q You haven't read the portions of General Westmoreland's testimony at his deposition that were referred to in defendants' brief in support
of their motion for summary judgment, have you?

A No.

Q As a historian, are you at all troubled by the fact that you have not undertaken any systematic examination of what General Westmoreland has testified to in connection with this litigation?

A No, because I think I understand pretty well from having lived through this period what the issues were and the positions taken and the resolution of the issue.

I would be, you know, glad to read his deposition, but I have the sense of what the argument about General Westmoreland's position has consisted in and I was there in the period '67, '68. So that as a historian I have got a -- I am a prime source. I don't know everything that went on wherever, but I know a good deal and so I don't feel uncomfortable in giving my testimony as to what I knew, which is what after all this is about.

I am not being asked to write a history of this case. I am asked to respond to questions as to my knowledge of the issues involved. I am not uncomfortable of what I know about General Westmoreland's position.
MR. MURRY: Let us take a two-minute recess.

(A short recess was taken.)

(Continued on next page.)
BY MR. BARON:

Q    Dr. Rostow, what was your first exposure to the term "Order of Battle"?

A    1941, when I was in OSS. I joined OSS in the summer of 1941, before we were in the war. It was then, I guess, called the coordinator of information. And I was the assistant to Edward S. Mason, of Harvard, who was an economist who was head of the economic division of the research and analysis branch of OSS. And it was filled with Harvard people. And he shocked everybody by taking a Yale man as his special assistant.

And we went to work in Washington in that first year and got into several problems, in which the Order of Battle was figured.

For example, we worked on the possibility of the Germans invading Northwest Africa, and looked at the logistics, German order of battle, that might be brought to bear in that region.

We worked on the German capabilities in the offensive that we knew was planned for the spring of 1942 on the Russian front, the southern part of the Russian front.

So we looked at both data on the Russian and...
German order of battle.

We looked at the problem if the Japanese could possibly establish a foothold in Australia. So we looked at the Japanese order of battle and its logistic capabilities.

It was within that year that I worked with Edward Mason, both on certain substantive tasks in which his people were at work and as his aide in -- as a member of the Joint Intelligence Committee which was set up at that time.

That was my first introduction. I can tell you a lot more about my experience about Order of Battle, but that was the first time.

Q Were you trained as an intelligence officer when you joined the OSS?

A No. I was an economist and historian. But I can say without fear or contradiction that U.S. intelligence as of that time was in a pretty low state.

Q Pardon me. I didn't catch your answer.

A In a pretty low state, so we didn't feel inferior about going about those problems and learning on the job.

The reason is one that goes to the tradition of the U.S. military at that time-- it has now been
changed considerably—which was that first-rate officers in the three services did not go into Intelligence; they went into operations, they flew a plane or handled a ship or were engineers or artillery men, or whatever.

So that the ablest professional officers were not in any of the services in Intelligence as of the summer of 1941.

Partly that and the competition of OSS led to the bringing in of -- into G-2, under Stimson, a wholly new gang. Al McCormack. Was he Cravath? He might have been. I don't know. In any case, a New York lawyer. And the whole quality of intelligence was elevated in G-2.

But as of that time, we learned our profession on the spot. And I went on, after a year of that intense education, to work in London on the bombing selection problem.

Again, I was in the order of battle, but it was plainly the Air Force and the estimation order of battle.

I don't want to burden you with more anecdotes or autobiographic, but you can pursue that.

Did you ever receive any intelligence.
training in a formal sense?

If you want me to specify. What I mean by that is: Did you ever receive intelligence training from one of the services that was called intelligence training, as distinguished from merely what I think you called on-the-job training?

A No, I did not, and -- no.

Q You say your first experience with order of battle was with respect to the German order of battle in Africa.

A Yes. We did, in that year, three major studies, that I was assigned to work with by Professor Mason.

One was the German capacity to take over Northwest Africa, which involved looking at the German order of battle that might be brought to bear in that region, but especially the logistical capacity of moving forces.

That study, incidentally, was turned around and became the basis for our own logistical planning when we moved into North Africa in the autumn of 1942.

The second study was the study we did of the German and Soviet capabilities in the confrontation that we anticipated as the Germans tried to drive through the south of Russia, Stalingrad, and we made
estimates of German and Soviet capabilities and the
order of battle that would be brought to bear, and
again the logistical capacities of the Germans.

The third was the study of the Japanese
capacity to move beyond New Guinea and achieve a
foothold in Australia. That, again, was a question
of (a) what they had in hand that they could move
into that region, and again the logistical capacity
and what we can do about it.

So those three studies. There were other things
involving the order of battle, but that was the year
about which I learned a good deal about order of
battle and data that we mobilized.

Q Was the logistical capability a
significant aspect of the assessing the capability of
the Germans to operate in Africa?

A Yes, it was. In all three cases, the logistics
turned out to be critical.

We are not talking about order of battle. We
are talking about capabilities, which is what you can
do with that order of battle in a particular context.

For example, in North Africa, it was a question
of (a) what they could move across the Mediterranean,
given the British-U.S. naval capabilities in that
region; (b) what they could do, given the roads and railway lines in Northwest Africa. You know, how many tons of supplies could they move in support of the fighting units.

And in the case of the Soviet front, the outcome really hinged on whether they got a double-track railway track that ran from Voronezh to Stalingrad. We figured that the supplies -- if the Germans didn't get that line, their fighting punch would diminish, and it was very doubtful that they could take Stalingrad.

It was regarded as an outrageous view to come to. The general view was that Germans would sweep through without opposition. The Russians did hold at Voronezh. They never got the double-track line.

When they got to Stalingrad, it was a bitter fight, and their logistics were taken up -- a lot of them were carrying gasoline for the trucks that were supplying them, and they didn't get a railway line.

It was also in terms of the Japanese logistical aspect, very important—how much punch they had, very far from their major bases. It was that, logistics and order of battle. And we pioneered studies of that kind, which then turned out to be very
useful for the next round of work which I did, for
helping pick the targets for attacking on the German
air force.

You know, I don't want to bore you, if this
sounds irrelevant with you, but I will be glad to go
further. I don't want to waffle along.

Q You assessed the logistical capability
of a given enemy force or your own force?

A That's right.

Q There are, I assume, a variety of
factors that go into that; is that correct?

A Yes, sir.

Q One of those factors would be things
like railroads and trucks and materiel that transport
vehicles or methods; is that right?

A Yes. Sure.

Q Is another aspect of logistical capability
the forces that one is able to use to engage in the
transport of war materiel and troops?

A Yes.

Q Did you assess those logistical forces?

A In all three cases, yes.

Q Is that kind of assessment important in
assessing an enemy's capability to wage a campaign or
operate in a particular theater?

A Yes, it is. What his total transport capability in all its dimensions is fundamental, and it is fundamental depending, however, on the rate of fire. That is to say, a unit that is not engaged intensively will shoot off much less amunition than one that is.

So that the tonnages vary greatly, depending upon the degree of the intensity of the engagement, but you have to enter into this whole logistical system and understand it. That is correct.

(Continued on next page)
Q I assume there are also variables like the extent to which you can rely on the indigenous population or indigenous area to provide you with food and other necessities, as distinguished from having to transport those yourself; is that reasonable?

A To the extent that you can get it supplied by the local folks or live off the land, which is sometimes -- in Russia they tried to live off the land. Although I will say that the Germans really had to supply most of that army that was in the south of Russia from their own bases.

Ultimately -- but your ammunition and oil turn out to be very big items in the kind of sophisticated warfare where you had steady engagement in the three cases that I cited.

Now you are obviously thinking of Southeast Asia. And the logistical issues there were significant but -- yes, there is a different kind of intensity of engagement generally.

Q Is it significant in the analysis of any enemy and any enemy's capability to determine the forces that he can bring to bear to transport supplies, transport men, transport war material?

A It is true. On our side too. You have exactly
the same kind of analysis.

Whom have we got to unload at docks and man
the ships and man the ports at our end, man the railroads.
Yes, the whole logistical flow is relevant
to an assessment and capability.

Q In assessing an enemy's logistical
capability, is it relevant whether logistical functions
are performed by people in uniform or by people in
civilian clothing?

A Is it relevant?

Q Yes.

A It depends upon the exact context. The -- it
doesn't really make a great deal of difference
whether you load the docks at San Francisco to get
our supplies, let us say, to South Vietnam with
military men or civilians, sometimes supervised by
military.

The Saigon docks were mainly civilians with,
again, some military supervision unless you had
some very, I guess, sensitive materials coming in.

And -- well, I think you've got to take --
you've got to make sure in assessing any military
structure's capabilities what forces it can bring up
to a certain position and how well it can supply them.
And you've got to be sure that you make an assessment of that whole chain of supply, which involves many elements, all the way from production, factories, and transporting.

In the case of North Vietnam, for example, they didn't produce a Saturday night special, so everything they had came from abroad. All that supply came from Chinese factories, Soviet factories and Czech factories, and the ships that brought them and railway lines that brought them. It was a complicated flow.

You've got to check it out, you are quite right, as part of the amateur analysis of one side's or the other's military capability.

Q Did you also say that you did some order of battle analysis related to the Japanese efforts in Manchuria?

A No.

Q I'm sorry?

A The question that we were put, and I think it was in the late spring of 1942, was -- the Joint Intelligence Committee was considering it, and our group -- and by that time, we had become quite professional in this logistical analysis:
Can the Japanese establish a foothold and maintain a foothold in the northern part of Australia? That obviously depended how much, in part, on what kind of naval and air power we can throw across to them at New Guinea and the Coral Sea, as it turned out.

But on the intelligence side, you are not supposed to look at your own side. You look at the Japanese side.

We looked at the analysis and the kinds of forces that would be required to hold on land what was required, and what their logistical capacities were, given the fact that they were sending their supplies a good long distance from Japan. And what happens, you use up more of your ships to carry supplies for your ships, just as the Germans had to use more and more of their supplies across the south of Russia to carry the gasoline for their trucks.

So, as you extend the lines of supply, you get into that sort of diminishing returns.

But we did our part of the analysis and it was part of the general study done by the U.S. government at that time.

Q Did you do any order of battle analysis after that?
A I was up to here in the order of battle analysis in the German air force.

Q The latter part of World War II?

A 1943, 1944, the better part of three years.

I came over and helped set up this unit, the enemy objective unit in September of 1943. Then I was put into the Air Ministry, as a working member of the Air Ministry, because Churchill ruled when there was some intelligence crisis, that never again should the British recommend a target unless there was an American at the working level. And I was put in the British unit as a working member of the German aircraft production unit, AI 2A.

There was an order of battle unit, AI 2B, headed by a brilliant barrister named Ronald Horn. And Americans were put in there at the working level also.

But my job was German aircraft production and targeting, and I was, in effect, I was the secretary of the jockey committee.

The jockey committee was a committee of generals and air marshals representing the Eighth Air Force, U.S., 15th Air Force, U.S., and the RAF.

We met every Tuesday and I had to lay before
them recommended targets for attack from the
Mediterranean by U.S. forces with our capabilities,
RAF forces with their capabilities.

I, of course, was the mobilizer for all the
forms of British intelligence, the Ultra, prisoner
of war interrogations, the photographic intelligence,
the stuff from the underground, et cetera.

So I did those targets, you know, every
Tuesday down to the day just shortly before VE Day,
when the German air force was declared to have no
offensive or defensive capability.

In that, I worked with every branch of British
intelligence. I would pull it together. Part of that
was to understand what was happening in the German
order of battle.

I called to the attention of Crile and
company, after my interrogation, one of three major
battles I was in involving intelligence. But this
was a wonderful order of battle debate.

It may be relevant to this case because it was
out of that experience that I made the recommendation
that when I discovered in early 1967 that there was
a difference on the order of battle, that they meet.

What happened was, Churchill's method was,
when there was a debate on intelligence and other
matters, to bring both sides together to bring down
Lord Cherwell. He had a brilliant group of bright
young men. And we had a hearing, Cherwell as judge,
and a couple of very bright fellows, young lawyers
and one economist named Bensusan-Butt.

In any case, here is a good story because
here were men who had available to them every form of
intelligence at its highest level.

We had -- and I can talk about this without
inhibition -- it was Ultra and a very wide spectrum
of communication intelligence, combat -- contact with
the German units. We knew them, what units they had,
what kind of aircraft.

The question was, what will they do on D Day,
how many German planes will fly against us on D Day.
And we differed.

My unit said 200 and Ron Horn's fellows said
2,000. It was consequential because if you thought
2,000, you damn well put a lot of planes in the
air to defend--to defend the fleet and landing and
logistics as opposed to go and shoot up Germans.

We had a full-fledged debate. Churchill
heard about it. Lord Cherwell, and I often tell my
students, as a lesson, "Listen, the answer turned out
to be effective sorties. Maybe twelve flew against
us on D Day. So there is a certain modesty about
estimates."

It's a good story because it's one of many that
I could cite for intense intelligence debates with
different views among people of perfect integrity,
perfectly normal.

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