

Interagency Areas of Responsibility: *It Shouldn't Take a Genius to Make Geography Simple*

by Mark Sweberg and Allan Childers

Many philosophers, artists, strategists, and inventors talk about the value of simplicity. Singer Pete Seeger said, “Any darn fool can make something complex; it takes a genius to make something simple.”¹ Philosopher Henry David Thoreau mastered the art of living simply. A principle of war is simplicity in planning and operations. Yet, bureaucracy inherently leads to complexity that requires constant monitoring, correction, and new vectoring when opportunities arise. Now is the opportune moment to align interagency departments and agencies for managing international affairs through consistent organizational structures in a whole-of-government perspective.²

Today's unsettled post-Cold War and post-Operations Iraqi Freedom/Enduring Freedom environment has driven U.S. policymakers and war planners to shift their focus. Instead of focusing on warfighting and international development and assistance, they are now focusing on combating terrorism, managing stability and capacity building in host countries, applying a whole-of-nation approach, working within fiscal constraints, and increasing collaboration among U.S. and international agencies. Russia's and North Korea's increasingly threatening postures in Europe and Asia make such strategies particularly urgent. And yet the global structure of the U.S. government's international posture has not changed much since the Cold War. The fact that key foreign affairs departments each view the world differently creates unnecessary complications and bureaucracies that waste precious resources and create more complex coordination challenges.

In July 2013, Secretary of Defense (SecDef) Chuck Hagel announced a 20 percent cut in the number of senior military and civilian positions within the Pentagon by 2019. An estimated 3,000

Mark Sweberg has over 30 years' experience working on government domestic and foreign policy, programs, and operations stemming from 21 years in the army, 10 years with the U.S. State Department and 10 years as a defense contractor. Sweberg is currently working towards his Ph.D., and holds an MBA from the University of Puget Sound, an MA from University of Southern California and a BS in Engineering from the United States Military Academy.

Allan Childers is a retired USAF colonel with more than 30 years' experience working on government domestic and foreign policy, programs, and operations stemming from a full career in the Air Force, assignments with the U.S. Department of State and over 10 years as a defense contractor. He holds an MS from the National Defense University, MA from Webster College, and BBA from Chaminade University of Honolulu.

to 5,000 jobs will be cut from a bureaucracy that has heretofore shown remarkable resistance to cuts or even to a freeze on growth at the upper echelons.³ The Office of the Secretary of Defense (OSD) is again considering rearranging the combatant commands (COCOM) and their areas of responsibility.⁴ Congressional efforts to cut the International Affairs budget have placed the Department of State (State) and U.S. Agency for International Development (USAID) in positions where they may also need to slash billets.

Whether or not further cuts in defense spending become reality, Secretary Hagel, like his predecessors, has expressed the need for the Pentagon to examine its operations and the size and shape of the armed forces and command structures. Cutting senior level positions and reshaping U.S. military forces provide an opportunity to align boundaries within the Department of Defense (DoD) and with other departments to create a more efficient bureaucracy. Creating this efficient bureaucracy will require “out of the box” thinking, and the jury is still out as to whether DoD and the other foreign affairs departments will come together to effectively resolve this issue.

Bureaucracy Creates Unique Boundaries

Bureaucracies are slow and unyielding when challenged to respond to change, whether it be building capacity or responding to crises. Task alignment through consistent areas of responsibility (AORs) within the national security bureaucracy is problematic. The biases of different bureaucrats responsible for regional engagement in overlapping AORs and bordering areas of interest send mixed signals, as each agency serves different missions, offers extremely different capacities and resources, and views each country’s requirements from different perspectives. Unlike cutting positions, aligning AORs results in improved agility and

eliminates unnecessary bureaucracy, waste, redundancy, accountability disparities, and differences in measures of effectiveness/performance.

Aligning AORs requires a comprehensive structure that clearly defines and aligns responsibilities and functions among U.S. government departments and agencies. This structure would enhance efficiencies and reduce the added expenses that plague government

...the global structure of the U.S. government’s international posture has not changed much since the Cold War.

action on a daily basis. During the past decade, the interagency has sought to articulate a comprehensive approach for international affairs. However, this comprehensive approach is hindered by a bureaucracy that consists of a spider web of decision-makers, assistants, advisers to department and agency leaders, and representatives to various international groups that complicate and slow execution of programs at the operational and tactical levels. A fundamental solution is to align engagement regions within the Pentagon and other U.S. government agencies and departments responsible for international engagement.

Many planners and policymakers across the U.S. government complain of a lack of consistency of geographic boundaries for coordination among agencies and departments. There is such a complicated morass of overlapping roles and responsibilities among regional and functional advisers and implementers within the interagency that even with an understanding of each agency’s or department’s responsibilities and functions, coordination among all the potential stakeholders on international activities is cumbersome, if

not impossible. The only daily link between each department's or agency's bureaucracy occurs at the top leadership positions and the bottom country director or desk officer within OSD, DOS, USAID, and COCOMs. These

OSD, State, COCOMs, Services, and separate operating agencies do not align geographically or functionally with each other or with other departments and agencies.

desk officers must work through a complicated structure with overlapping and/or incongruent guidance across areas of responsibility that are managed differently at the mid levels.

In the last 10 years the government has taken steps to resolve some of the bureaucratic challenges the foreign affairs organizations face. Presidential Policy Directive (PPD-6), "U.S. Global Development Policy," elevates development to a status equal to diplomacy and defense and seeks to "foster the integration of capabilities needed to address complex security environments."⁵ PPD-23, "U.S. Security Sector Assistance Policy" guides departments to "foster U.S. government policy coherence and interagency collaboration" by synchronizing interagency efforts.⁶ The PPDs create interagency and departmental working groups to formalize the informal coordination that occurs in the field and align implementation at the strategic levels in Washington from a functional perspective. However, these solutions fail to align policy attention by geographic regions across the diplomacy, development, and defense functions.⁷

Titles 10 and 22, U.S. Code identify how OSD and State offices are organized.⁸ The Unified Command Plan establishes the COCOMs,

their geographic AORs, and missions, among other actions. OSD, State, COCOMs, Services, and separate operating agencies do not align geographically or functionally with each other or with other departments and agencies. OSD's AORs do not align with geographic bureaus within State that are responsible for U.S. government foreign policy, within USAID that are responsible for implementing development policy, or within COCOMs that are responsible for implementing most DoD programs within the AOR.⁹ This situation unnecessarily complicates DoD's planning and execution of a comprehensive approach with State, USAID, and other interagency stakeholders with international affairs responsibilities and functions.¹⁰

Key Players and Their AORs

The Under Secretary of Defense for Policy (USD [P]) is the principal staff assistant responsible for DoD policy development and implementation. Among many critically important activities concerning national security policy, the USD(P) is responsible for regional security affairs that include contributing to a holistic U.S. government engagement in programs and policies in cooperative engagement with foreign countries.¹¹ The USD(P) conducts these responsibilities through several regional and functional deputy and assistant secretaries (Assistant Secretary of Defense for International Security Affairs [ASD(ISA)], Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs [ASD(HD&AS)], and Assistant Secretary of Defense for Asian and Pacific Security Affairs [ASD(APSA)]) and other staff.

Within State, the Under Secretary for Political Affairs manages regional and bilateral policy issues for all individual countries around the world. The office conducts these responsibilities through assistant secretaries who manage six geographic bureaus (Africa,

U.S. Department of Defense Commanders' Areas of Responsibility

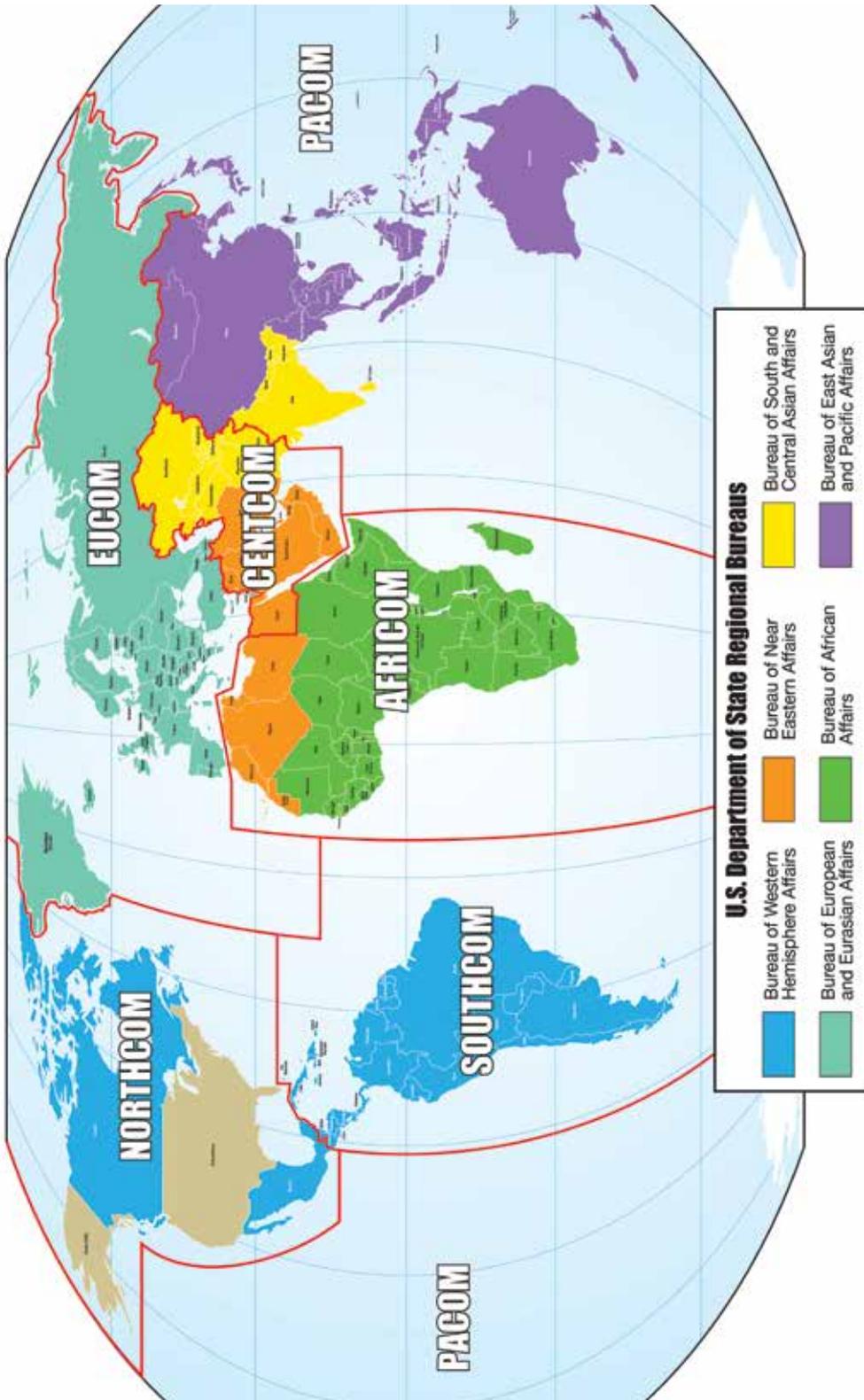


Figure 1. DoD and Department of State Areas of Responsibility
 Source: www.state.gov

East Asia and the Pacific, Europe and Eurasia, the Near East, South and Central Asia, and the Western Hemisphere) and a functional bureau for International Organizations. State also uses a Political-Military Policy and Planning Team located in the office of the Under Secretary for Arms Control and International Studies Bureau for Political-Military Affairs to support interagency cooperation and regional support for civilian-led tasks directly with the COCOMs.¹²

The USAID Office of the Administrator manages five regional bureaus (Africa, Europe and Eurasia, Asia, Middle East, Latin America and the Caribbean) that are inconsistent with State and an Office of Afghanistan and Pakistan Affairs.

Figure 1 depicts how State and the COCOMs organize the world for international engagement. When overlaying the different geographic AORs of the OSD, USAID, and other agencies, the graphic becomes too complicated to sort out.

Within the Pentagon's Office for Security Defense (Policy), the ASD (ISA) is the principal advisor to the USD (P) and to the SecDef on international security strategy and policy on security cooperation and foreign military sales for Europe, the Middle East, and Africa. Sub-level Deputy Assistant Secretaries of Defense (DASD) for specific AORs manage day-to-day relations with foreign governments; develop regional security and defense strategies; and implement policy, plans, and activities that support responsibilities for capacity building of foreign militaries.¹³

- The AOR for DASD's European and Eurasian Affairs AOR extends across 51 countries, dependencies, and areas of special sovereignty from the Atlantic Ocean to the Mediterranean. The AOR for USAID's Bureau for Europe and Eurasia parallels State's AOR but only operates programs in 15 of the countries. State and USAID AORs are consistent with the United States

European Command AOR (USEUCOM).

- The AOR for DASD's Middle East Affairs AOR includes 15 countries that stretch from Egypt and the Arabian Peninsula to Lebanon, Syria, Iraq, and Iran.¹⁴ Thirteen of these countries are among the 20 countries within the USCENTCOM AOR;¹⁵ however, the AOR also includes Israel and the Palestine Territories also assigned to the USEUCOM AOR.¹⁶ Meanwhile, State's Near Eastern Affairs (DOS/NEA) AOR includes the same countries as the DASD, plus the six countries of North Africa. Five countries in the DOS/NEA AOR lie within United States Africa Command's (USAFRICOM) AOR and two within USEUCOM's AOR. The remaining 12 countries make up a portion of United States Central Command's (USCENTCOM) AOR. USAID's Bureau for the Middle East covers the same areas as DOS/NEA; although, USAID only operates in six of the countries and in West Bank and Gaza.¹⁷
- The AOR for DASD's African Affairs AOR includes all of the countries on the African continent except Egypt, which is part of DASD's Middle East Affairs AOR. This is the same construct for two COCOMs (USAFRICOM's AOR includes the entire continent except for Egypt, which is assigned to USCENTCOM's AOR). State's Bureau of African Affairs and USAID's Bureau for Africa include only the 49 countries in sub-Saharan Africa. It does not include the six countries of North Africa that are collocated with the DOS/NEA and USAID's Bureau for the Middle East, which is divided into offices covering sub-regions of the AORs.

Different OSD assistant secretaries oversee Asia, the Pacific region, Latin America, and South America.

The ASD(HD&ASA) consists of several functional offices for homeland defense issues and one office (Western Hemisphere Affairs [WHA]) that is responsible for engagement with AOR countries.¹⁸ WHA covers responsibility for 39 countries within the Western Hemisphere but not the U.S.¹⁹ USAID's Bureau for Latin America and the Caribbean currently has programs in 18 countries throughout Mexico and South America. COCOMs split the region into two AORs: United States Northern Command's AOR includes Canada, Mexico, and the Bahamas in addition to the U.S. and its territories, and United States Southern Command's AOR includes the countries in Central and South America and within the Caribbean Sea.

The ASD(APSA), responsible for policy, strategy, and relations with governments, defense establishments, and international organizations within the OSD-defined Asia-Pacific region, is broken into three DASD sub-regions—Afghanistan, Pakistan, and Central Asia (APC); East Asia (EAS), and South and Southeast Asia (SSA). State conducts operations within the Asia-Pacific region through two bureaus—the Bureau of East Asia and the Pacific (EAP) and Bureau of South and Central Asian Affairs (SCA). USCENTCOM and United States Pacific Command (USPACOM) are responsible for portions of these AORs. USAID covers this region with two sections—Bureau for Asia (East Asian Affairs and South and Central Asian Affairs) and Office of Afghanistan and Pakistan Affairs.

- DASD sub-region APC includes seven countries from Kazakhstan to Pakistan. The SCA is responsible for foreign policy and relations with these seven countries, as well as India, Nepal, Bhutan, Bangladesh, Sri Lanka, and the Maldives. These seven countries are among the 20 countries within USCENTCOM's AOR, and six of these countries are also located within

Figure 1 depicts how State and the COCOMs organize the world for international engagement. When overlaying the different geographic AORs of the OSD, USAID, and other agencies, the graphic becomes too complicated to sort out.

USPACOM's AOR. The remaining 13 countries in USCENTCOM's AOR are also within DASD(ME)'s AOR. USAID's Office of South and Central Asian Affairs parallels SCA, except they have no programs in Bhutan, while USAID's Office of Afghanistan and Pakistan Affairs covers the remainder of the AOR.

- DASD sub-region EAS aligns with seven of the 36 countries in USPACOM's AOR. EAP's AOR includes 31 countries from Mongolia and China to Australia and New Zealand and the island nations of the Pacific. All of these countries are also within USPACOM's AOR, which also includes five countries within SCA's AOR. USAID's Office of East Asian Affairs programs operate in 21 countries consistent with the EAP's AOR.
- DASD sub-region SSA aligns with the other 24 of 31 countries within the EAPS AOR and 29 of 36 countries²⁰ within USPACOM's AOR.

Complicating the OSD structure even more is the organization of separate defense agencies that support capacity building in foreign countries. For example, the Defense Security Cooperation Agency (DSCA) divisions do not align with any other AOR among organizations responsible for capacity building, including OSD and the COCOMs.²¹ DSCA is organized

under the Principal Director for Operations into Regional Deputies for Asia Pacific Americas, Europe/ Africa, Middle East, and South and Central Asia to support security cooperation programs around the globe. The Regional Deputy for Asia Pacific Americas supports countries in the USPACOM, USNORTHCOM, and USSOUTHCOM AORs; the Regional Deputy for Europe/Africa supports countries in the USEUCOM and USAFRICOM AORs; the Regional Deputy for the Middle East supports countries in the USCENTCOM AOR; and the Regional Deputy for South and Central Asia supports countries in the USCENTCOM and USPACOM AORs.

Other departments and agencies that interact with the country desk officers in OSD, State, USAID, or the COCOMs may also be regionally structured differently. For example, the Drug Enforcement Agency has 86 foreign offices in 67 countries structured within seven different regions: Andean and Southern Cone, Caribbean, Europe and Africa, Far East, Middle East, North and Central America, and Southwest Asia.²²

Why Is It Like This?

The current number of offices and shape of the DoD, State, USAID, and COCOM AORs are primarily an evolution from nearly 70 years of White House, State, and Pentagon leadership decisions and personal perspectives on the importance of engagement with various countries. They have evolved based on perspectives of how these countries influence and may be influenced by the U.S. on a regional, continental, and global basis.

The organizational structures of today were originally based on the National Security Act of 1947 that mandated a major restructuring of the institutions that formulate and implement foreign policy (the National Security Council (NSC), DoD, and State).²³ Until recently, NSC Policy Coordinating Committees led by

State-level Under or Assistant Secretary rank provided interagency coordination for foreign affairs through the same six geographic AORs as defined by the State Department. Even the recently renamed NSC Staff includes Special Assistants to the President and Directors that are so numerous in regions and issues for foreign policy that Wikipedia is needed to sort them all out. They are all shaped differently from all Executive department AORs.²⁴ The Goldwater-Nichols Department of Defense Reorganization Act of 1986 and subsequent changes continue to articulate why COCOM AORs are drawn the way they are.²⁵ In the past, policymakers also believed that two countries with the potential to wage war with each other should be in different COCOM AORs. This has not been a cause of concern outside of DoD, and the concept is changing within the department.

Recommendations

The following solutions are simple, compelling, and only require a resolve and commitment to efficiency and effectiveness to implement:

- Establish a standing interagency working group tasked to align and maintain or evolve (as needed) fewer AORs between the NSC and departments/agencies with responsibilities for country engagement. This group should also develop and implement policies/strategies to provide a comprehensive perspective to U.S. country, regional, and global engagement for each country desk officer to better implement U.S. government policy and strategy consistently and synergistically. While this recommendation creates yet another bureaucracy, if it is given a strong mandate and high-level support to reach a genuine solution, it can and should put itself out of business in a reasonable period of time.
- Redraw the AORs across all departments

and agencies supporting international engagement programs to make them consistent. Consider that political realities in the current environment should trump geographic boundaries. Align the regions of DoD DASD and ASD, State, USAID, and offices responsible for providing regional and country policy and planning direction so they are consistent with the State bureaus' AORs. For example, including North Africa countries in the Middle East bureau may be more appropriate than fencing the continent of Africa. Combining Pakistan-India into a broader AOR can provide new, more realistic perspectives to the Central-South-Southeast Asia region.

- Reduce the number of sub-region offices/positions reporting to senior policymakers and to whom country desk officers must report. Consider eliminating sub-regional breakouts within bureaus and directorates.
- Provide consistency of guidance/formats across departments/agencies to all country desk officers. For example, DoD and COCOM desk officers should receive all traffic passing through State and USAID desk officers for particular countries and vice versa.
- Modify the Unified Command Plan during the next update.²⁶ COCOMs should be totally aligned with DoD and State directorates/bureaus.

What Are the Risks and Advantages?

The risks and the advantages can be viewed collectively. Consistency among the interagency department/agency AORs would improve comprehensive implementation and engagement of U.S. government policies/strategies, programs, and activities with countries around the globe. The changes would demonstrate a refocusing of defense, diplomacy, and development priorities at a time when non-lethal solutions are the preferred method of country engagement. The changes will also help reduce the number of mid-level managers who may be currently providing different interpretations of senior-level guidance to their subordinates. Span of control could be better managed, and divisions in perspectives/approaches at key unstable borders can be eliminated (e.g., the separation of Israel from other Middle East countries, Pakistan-India, and northern Africa countries from sub-Saharan African countries).

Now is the most opportune time to align the AORs and the offices that manage them. Success can be realized if the leadership of DoD, State, and USAID address the challenges not from a department-centric point of view, but from a whole-of-government perspective. Alignment should be driven by the need for engagement in a new strategic environment, efficiencies, savings, and consolidations that are free from internal politics and “not invented here” turf wars. **IAJ**

NOTES

- 1 Kim Ruehl, “Pete Seeger, Biography and Profile, About.com, <http://folkmusic.about.com/od/artistsaz/p/PSeeger_profile.htm>, accessed on April 2, 2014.
- 2 This subject has been addressed from smaller perspectives of reorganizing COCOM AORs in the past. See Nathan Freier, “The 2011 Unified Command Plan—A Missed Opportunity?” Center for Strategic and International Studies webpage, <<http://csis.org/publication/2011-unified-command-plan-missed-opportunity>>, accessed on May 24, 2011. This article only addressed realigning the COCOMs to reduce resourcing levels. See also Lieutenant Commander David Coghlan, “Redrawing the COCOM Map,” *Armed Forces Journal*, October 2012, <<http://www.armedforcesjournal.com/archive/issue/2012/10>>, accessed on April 17, 2014.
- 3 “Hagel Orders 20 Percent Cut in Pentagon Top Brass, Senior Civilians,” *Washington Post* webpage, <http://articles.washingtonpost.com/2013-07-16/world/40609812_1_george-little-pentagon-defense-business-board>, July 16, 2013, accessed on April 2, 2014.
- 4 Marcus Weisgerber, “DoD Weighs Major COCOM Realignment,” *DefenseNews* webpage, April 11, 2013, <<http://www.defense.com/article/20130811/DEFREG02/308110001/DoD-Weighs-Major-COCOM-Realignment>>, accessed on April 17, 2014.
- 5 “Fact Sheet, U.S. Global Development Policy,” <<http://www.fas.org/irp/offdocs/ppd/global-dev.pdf>>, accessed on April 2, 2014.
- 6 Office of the Press Secretary, White House, “Fact Sheet: U.S. Security Sector Assistance Policy,” April 5, 2013, <<http://www.fas.org/irp/offdocs/ppd/ssa.pdf>>, accessed on April 2, 2014.
- 7 The important role that Congress plays in defining and supporting interagency structures and the missions they implement is recognized but is outside the purpose of this paper.
- 8 Title 10, United States Code, Section 113 and 134 provide guidance to DoD. Within OSD, DoD Directive 5111.x-series publications provide guidance on the authorities and responsibilities for USD(P) and subordinates. Title 22, USC, refers to State’s organization. See <<http://www.law.cornell.edu/uscode/text/10/113/>>, <<http://www.law.cornell.edu/uscode/text/10/134/>>, <[http://www.law.cornell.edu/uscode/text/22/chapter 38](http://www.law.cornell.edu/uscode/text/22/chapter%2038/)>, and <<http://www.dtic.mil/whs/directives/corres/dir/htm>>, accessed on April 2, 2014.
- 9 Joint Staff Directorate for Strategic Plans and Policy (J-5), Directorate for Politico-Military Affairs is structured both functionally and geographically. The geographic deputy directorates include desk officers in Africa, Asia, Europe, Middle East, and the Western Hemisphere and a Pakistan Afghanistan Coordination Cell. Although they have roles and functions in assisting the Chairman of the Joint Chiefs of Staff to provide military advice to the President and guidance to the combatant forces, they are not in the chain of command and control to provide the same level of direct engagement on capacity building with host countries. The J-5 offices are, therefore, excluded from this paper but should be included in any future alignment of AORs among departments. For more information on the Joint Staff see the *Joint Officer Handbook*, August 2012, <http://www.dtic.mil/doctrine/training/joh_aug2012.pdf>, accessed on April 2, 2014.
- 10 This paper primarily addresses the OSD, State, and COCOMs because the operational chain of command runs from the President to the Secretary of Defense to the combatant commanders in the defense side and to the Secretary of State on the diplomacy side.
- 11 Office of the Secretary of Defense, “Fiscal Year 2012 Budget Estimates,” February 2011, p. 27, <http://comptroller.defense.gov/defbudget/fy2012/budget_justification/pdfs/01_Operation_and_Maintenance/O_M_VOL_1_BASE_PARTS/OSD_OP-5_FY_2012.pdf>, accessed on April 2, 2014.

- 12 For a description of the PPT, see Department of State website, <<http://www.state.gov/t/pm/ppa/pmppt/index.htm>>, accessed on April 2, 2014.
- 13 <<http://policy.defense.gov/OUSDPoffices/ASDforInformationSecurityAffairs.aspx>>, accessed on April 2, 2014.
- 14 For simplicity in discussion only, the Palestinian Territories will be referred to as a country. This should not be construed as a statement of policy.
- 15 For a list of USCENTCOM AOR countries, see USCENTCOM homepage, <<http://www.centcom.mil>>, accessed on April 2, 2014.
- 16 For a list of USEUCOM AOR countries, see USEUCOM homepage, <<http://www.eucom.mil>>, accessed on April 2, 2014.
- 17 See <<http://www.usaid.gov/who-we-are/organization/bureaus/bureau-middle-east>>, accessed on April 2, 2014.
- 18 Department of Defense Directive, no, 5111.13, “Assistant Secretary of Defense for Homeland Defense and Americas’ Security Affairs,” January 16, 2009, <<http://www.dtic.mil/whs/directives/correspdf/511113p.pdf>>, accessed on April 2, 2014. This directive delegates this office with responsibility to serve as principal civilian advisor to the SecDef and USD(P) on Western Hemisphere security affairs but does not delineate which countries are included in the responsibility. For a list of USSOUTHCOM AOR countries, see USSOUTHCOM homepage, <<http://www.southcom.mil>>, accessed on April 2, 2014.
- 19 See a description of State’s regional breakdowns and specific country information at U.S. Department of State homepage, <<http://www.state.gov/countries>>, accessed on April 2, 2014.
- 20 This DASD includes India and all other South Asian countries, except Afghanistan and Pakistan, the nations of Southeast Asia, plus Australia, East Timor, New Zealand, and the Pacific Island States, <<http://www.defense.gov/bios/biographydetail.aspx?biographyid=189>>, accessed on April 2, 2014.
- 21 See DSCA link at <<http://www.dsca.mil/about-us/operations-ops>>, accessed on April 2, 2014.
- 22 Drug Enforcement Administration homepage, <<http://www.justice.gov/dea/about/foreignoffices.shtml>>, accessed on April 2, 2014.
- 23 National Archives, Online Public Access, <<http://research.archives.gov/description/299856>>, accessed on April 2, 2014.
- 24 No official source for this breakdown was found. Reference <http://en.wikipedia.org/wiki/United_States_National_Security_Council>, accessed on April 2, 2014.
- 25 U.S. Code Legal Information Institute, Cornell Law School, “Goldwater-Nichols Act of 1986,” <http://www.au.af.mil/au/awc/awcgate/congress/title_10.htm>, accessed on April 2, 2014.
- 26 For current insight to the Unified Command Plan, see Andrew Feickert, “The Unified Command Plan and Combatant Commands: Background and Issues for Congress,” Congressional Research Service, January 3, 2013, <<http://www.fas.org/sgp/crs/natsec/R42077.pdf>>, accessed on April 2, 2014.