INTELLIGENCE COMMUNITY ACQUISITION & DEVELOPMENT

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The Intelligence Committee of AFCEA International

and

The Innovative Council of the Intelligence and National Security Alliance
The Intelligence Committee of the Armed Forces Communications and Electronics Association (AFCEA) and the Innovative Technologies Council of the Intelligence and National Security Alliance (INSA) are pleased to offer this white paper regarding the acquisition and development of technology programs in the national security community. This paper includes observations about the current state of intelligence capability acquisition and development – particularly relating to technology – with specific recommendations to improve the current situation, both in the short- and long-term. It focuses on the political and social conditions necessary to achieve program success, rather than on questions dealing with reform of the acquisition process. The latter topic has been covered repeatedly, with mixed results. The former topic remains largely unaddressed, and in the view of both organizations, needs additional attention to improve program performance.

This white paper is offered jointly by AFCEA and INSA in an effort to contribute to the ongoing national discussion regarding ways to strengthen the Intelligence Community. While we do not regard this paper’s recommendations as necessarily definitive, we present its recommendations in hopes of encouraging momentum for the development of an Intelligence Community that is more capable of gaining the benefits of technological innovation and placing those benefits at the disposal of our nation’s security.¹

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# INTELLIGENCE COMMUNITY ACQUISITION AND DEVELOPMENT

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INTRODUCTION

Effective system development requires recommendations that can gain the concurrence of the Intelligence Community’s many stakeholders and be implemented. The Community faces many challenges in the acquisition and development of new capabilities (e.g., collection against foreign WMD programs, and in support of counterinsurgency operations, and meaningful fusion of information from disparate sources). These challenges are real problems that impair the nation’s ability to gather, analyze, and employ intelligence that is vital to the President, the larger government, and our warfighters. To meet these challenges, new competencies must:

- Provide capabilities to meet current and projected requirements and help position our nation for requirements not yet anticipated.
- Take advantage of the pace of technology development
- Be delivered on time and on budget.
- Represent significant improvements worth the additional investment.

In addition, our ability to develop and acquire new capabilities must address cross-Community program issues relating to integrated mission management, common information architecture, and complex, multi-intelligence (multi-int) missions, as well as existing, multiyear programs that have yet to be harmonized across the Intelligence Community.

Finally, and perhaps most importantly, we need to regain the means to develop, deploy, and use technologies that represent fundamental changes in our mission effectiveness, as opposed to modest, incremental enhancements to today’s capabilities. Doing so means accepting, confronting, and learning to manage the risks intrinsic to working with new technologies. Our failure to do so will not inhibit foreign competitors from seeking the benefits of technologies that are fundamentally different and more advanced than those we use today.

Numerous studies have been conducted over the past few years highlighting these needs, as well as the difficulties the Intelligence Community has experienced in attempting to meet them. The 2006 Defense Acquisition Program Assessment
(DAPA) report proposed a wide-ranging set of initiatives for the nation’s ability to acquire complex systems, and systems of systems. The DAPA report provided an integrated view of requirements, acquisition, and program planning and budgeting. The Weapons System Acquisition Reform Act of 2009 mandates more oversight, more accountability, and more emphasis on reducing cost overruns. Indeed, the President noted:

“The purpose of this law will be to limit cost overruns before they spiral out of control. It will strengthen oversight and accountability by appointing officials who will be charged with closely monitoring the weapons systems we’re purchasing to ensure that costs are controlled. If the cost of certain defense projects continues to grow year after year, those projects will be closely reviewed, and if they don’t provide the value we need, they will be terminated. This law will also enhance competition and end conflicts of interest in the weapons acquisitions process so that American taxpayers and the American military can get the best weapons at the lowest cost.”

As this law indicates, the Executive Branch and Congress have put in place more stringent oversight processes in hopes of gaining better visibility into requirements, projected costs, system engineering approaches, and schedules. In fact, the level of oversight today is unprecedented. Nunn-McCurdy breach provisions relating to major acquisition programs are designed to raise the level of visibility – and raise the specter of punitive actions – regarding cost overruns. As the DAPA report noted, acquisition studies and recommendations are published frequently; many of these studies duplicate previous recommendations. Changes in acquisition approach, such as the rise and fall of “acquisition reform” in the form of the Total Systems Performance Responsibility (TSRP) approach, and other philosophies litter the landscape. Yet, programs continue to fail, be delayed, suffer cost overruns, and get reduced to incremental gains in capability – gains that are inconsistent with our nation’s technological and industrial capabilities and potential.

This situation costs the nation in many ways. It reduces the effectiveness of our intelligence; it does nothing to spur technological innovation; it contributes to the atrophy of our industrial base; and it opens the possibility that nation-state competitors will best us in areas in which our technological and operational supremacy is no longer evident. In contrast, we have become increasingly content with program progress that represents extensions of the capabilities we have. Indeed, we have become accustomed to eschewing approaches that yield transformation capabilities (i.e., capabilities that represent orders of magnitude in their effectiveness or fundamentally new ways of accomplishing our missions) even in cases where technology holds the promise of reaching these goals. More often than not, individual program managers are left to take the brunt of criticism for program issues when, in fact, there are processes over which they have little influence (e.g., requirements) and other issues over which they have no control (e.g., annual budget guidance, policy changes, etc.) We can do better, and we must.
THE CURRENT STATE OF SYSTEM ACQUISITION AND DEVELOPMENT

Despite numerous efforts at “acquisition reform,” the state of system acquisition and development continues to disappoint important stakeholders in the Executive Branch and Congress and hinders the development and acquisition of significant new capabilities. Systems continue to be delivered late, and delays and cancellations of leading-edge capabilities have led us to retrench to incremental improvements, even as it becomes clear that we need transformational improvements. The December 2009 attempt to ignite an explosive device on a domestic flight landing in Detroit highlights the need to move beyond manual “pattern recognition” and gain the benefits of technologies that identify dangerous patterns in disparate databases and alert national security decision-makers to emerging threats in time to forestall them. The Weapons System Reform Act of 2009, cited above, imposes more reporting and accountability requirements. The government is taking steps to increase the number of acquisition and procurement specialists on whom it can rely to represent the nation’s interest in the government’s dealings with the industrial base. Indeed, some decision-makers see the need to “recover” from the “acquisition reform” of the 1990s, an era in which the government stripped itself of acquisition program managers and relied on the program management capabilities of the vendors to which Total Systems Performance Responsibility (TSPR) was given.

Nonetheless, few would call today’s acquisition and development environment effective and timely; indeed, many remain frustrated by processes that procure technology at a pace far behind that at which technologies are developed in our industrial base. A mutual lack of confidence between government executives and the industrial base has led to government insistence on more fixed-price contracts. A predictable result will be more low bids on fixed-price contracts with resulting system performance and schedule slips as low bidders and their government customers struggle with the consequences of such an acquisition and development approach. Indeed, we have lost much of the ground gained during the decades immediately following World War II, when government and industry executives worked together, cost-plus contracts provided incentives for accelerated performance, and new national security capabilities were provided with unprecedented rapidity.

Evidence of this lost ground is not difficult to find. Transformational efforts for imagery and signals intelligence have been delayed. Information sharing as a kind of analyst “commentary” takes place in the A-Space and Intellipedia environments, but integrated mission management, exploitation, and processing remain elusive. The need for a true information sharing environment, one equipped with technologies that detect incipient threats and operate at the scale required by today’s global information environment remains largely unmet.

These problems endure, despite multifold efforts at “acquisition reform,” ranging from increased oversight and accountability to efforts to “resupply” the ranks of government procurement officials.

Several salient reasons exist for this continued impairment of our systems acquisition and development capabilities.

First among these is the lack of a sense of partnership and mutual confidence between the government and the industrial base. Efforts to limit incentives reflect this lack of partnership and confidence. While industry bears some responsibility for program slips and budget overruns, not enough has been done to identify and rectify lapses in acquisition strategy. Efforts to impose fixed price arrangements on developmental programs likely will exacerbate this problem.

Closely related to the first reason is the lack of government capability to develop true strategic acquisition strategies that serve transformational program needs. Increasing the procurement cadre will do little to create effective acquisition strategies if this nucleus of trained professionals is not led by acquisition executives empowered by the Community’s leadership and given support by Congress to build strategic approaches to the capabilities for which they are responsible, or if they are discouraged from building strategic relationships with industrial partners.
The need to build a more trusting relationship between the Executive Branch and Congress, which is something only the Community’s leadership and key members of Congress and their staffs can bring about, is as serious as the lack of strategic relationships between government and industry. A culture of “gotcha” overshadows the efforts of program managers. This is a culture in which technology risks are eschewed and slips in technology demonstration and risk reduction prototypes are used as political ammunition to undermine already-difficult program initiatives. Key Executive Branch overseers at the Office of the Director of National Intelligence and within the Office of the Secretary of Defense (within USDI and USDAT&L) must strengthen efforts to help build consensus among Congress, specific agencies, and individual programs.

In addition, our efforts continue to be hampered by an unwillingness to face the economic realities of “going it alone” as a nation for the purposes of development and production, as well as restrictions on sharing critical technology with allies and partners. A recent McKinsey study noted that insistence on U.S. support to domestic industry, without appropriate cooperation with allies and partners, causes the U.S. to score poorly in the defense “bang for the buck” that characterize our systems. While U.S. systems are highly capable, we pay dearly for this capability, while neither leveraging adequately foreign technologies nor sharing developmental and production costs in ways that reduce the burden on our own budget. Other countries gain more benefit per dollar, resulting in part from their willingness to participate in global cooperation. Our systems, which continue to lead in capability, are becoming unaffordable. Again, while this problem is well understood, we have not developed sufficient stakeholder consensus to address and resolve it. At 300 million persons, our nation represents five percent of the world’s population, making it increasingly unrealistic that we can dominate every area of technological significance. We should consider what we can gain through “leverage” in our relationships, by sharing technologies and key developmental efforts.

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HOW WE GOT HERE - A BRIEF SUMMARY OF REFORM EFFORTS

Since 1971, there have been (by some counts) 14 efforts at acquisition reform. Benjamin Freidman, a research fellow in defense and homeland security studies, has chronicled these efforts, and in doing so has provided a discouraging view of extensive efforts to build a process by which technology and systems can be made available to support our nation’s defense. DOD 5000, which provides overarching and detailed acquisition guidance, was rewritten significantly between 1971 and 2002. These changes altered program thresholds for efforts funded by research, development, test, and evaluation (RDT&E) dollars, as well as for those funded for acquisition and deployment. As Friedman points out, these changes have included the following:

- The number of program acquisition phases has increased from three to five (and sometimes more, if one counts pre-Phase 0 activities).
- Program initiation has changed for approval by the Secretary of Defense of a Mission Element Needs Statement (MENS), to approval of the Presidential Objective Memorandum, as well as at Milestones 0, 1 (or A), and B.
- The number of program milestones has fluctuated between as few as two to as many as seven.
- The components of the requirements process have increased to as many as 50, reflecting what appear to be wildly differing views of the extent to which requirements should drive the development of technology.

By 2002, decision-makers had become sufficiently frustrated with acquisition program setbacks to change the commitment to production to “low rate initial production” following Milestone C. DOD 5000 now demonstrated a clear preference for a process known as “evolutionary acquisition,” a development that one might see as explicit recognition of our waning ability to undertake programs that deliver essentially new capabilities. Further frustration with the acquisition process led to a 2002 decision by the Secretary of Defense to suspend DoD 5000, replacing it with DoD 5000.2-R, the Interim Defense Acquisition Guidebook. Since that time, the requirements process has changed, and a joint capabilities integration and development system has replaced the former requirements process.
Along the way, the concept of competitive prototyping was eliminated (diminishing our ability to identify and reduce risks associated with new technologies and designs), and subsequently restored.

Complicating this process was creation in the Intelligence Reform and Terrorism Prevention Act (IRTPA) of 2004 of joint Milestone Decision Authority exercised for Intelligence Community programs by both the Secretary of Defense and the Director of National Intelligence. The Office of the Secretary of Defense and the Office of the Director of National Intelligence have attempted to harmonize requirements, for key major acquisition (ACAT-1) programs as well as oversight and approval processes, in an effort that is ongoing. Overall, this process has made the defense acquisition a more visible, and perhaps more significant, component of Intelligence Community technology and systems acquisition.

Oversight has not stood still. Congressional efforts to oversee defense and Intelligence Community programs include the intention to use more aggressively Nunn-McCurdey breach notifications to curtail programs that experience significant cost growth. As noted above, the Weapons System Acquisition Reform Act of 2009 imposes additional oversight requirements.

How well is the reform of our acquisition and oversight processes working? Does the kind of reform that we have attempted yield benefits? Or, are we experiencing, as some critics claim, continued increases in program costs and budget slips, diminished changes of program success, and further setbacks in our ability to deploy innovative technologies?

While authoritative answers are difficult, the 2006 Defense Acquisition Program Assessment (or DAPA) provides clues. Convened by Acting Deputy Secretary of Defense Gordon Englund and led by Lt Gen Ronald Kadish, USAF (Ret.), the DAPA report noted that organizational, workforce, and process impediments remain. The DAPA report proposed a sweeping reorganization of acquisition components and processes. It called for less complex processes and questioned whether additional oversight is leading to better program performance or more distrust among stakeholders and less program stability.

Pointing to the lack of stakeholder support for programs, DAPA described an “instability cycle” in which program cost, schedule, and performance setbacks result in changes in program leadership, loss of stakeholder confidence, further program guidance, additional oversight, and more intervention in hopes of gaining program success. Such intervention tends to undermine program leadership, initiating further “spins” of the cycle.

It seems, based on the foregoing, that acquisition reform is not the answer to gaining the benefits of research, development, and technology innovation. It would be difficult to point to any technology-centric program in the Intelligence Community that has become more successful as a result of acquisition, or is making progress more swiftly than predecessor programs in earlier decades. More acquisition reform may be necessary, but it is clearly not sufficient. In fact, the quest for innovative technologies is now characterized by program managers who often are reluctant to be honest about real program costs, sensing the likelihood that accurate cost estimates will result in programs being canceled or curtailed. Risk-reduction activities that encounter real risk are considered program failures; resources for risk management are seen as budget padding, subject to cuts and reallocation (reflecting the subjugation of some programs to the role of bill payer).
FIXING OUR PROBLEMS AND GETTING THE RESULTS WE NEED

In an article published by the Washington Post entitled “Can the U.S. still tackle big problems? Lessons from the health-care battle,” authors William D. Eggers and John O’Leary describe a number of issues related to gaining significant ground on issues of national importance and things we might do to regain the initiative for meeting important objectives. These lessons bear scrutiny if we are to regain the ability of the Intelligence Community to develop and employ innovative technology.

At the most fundamental level, Eggers and O’Leary note that “(t)he problem is not our system. By design, democracy is slow to change course; new ideas always face a lengthy struggle. Rather, the problem is that the ways in which we have come to use this system – how we develop ideas, test them and put them into action – need repair.”

In other words, additional efforts to shape process and organization are unlikely to yield the benefits of swifter adoption of innovative technologies we desire. What is needed is agreement on the importance of what we are trying to accomplish and behavior that conforms to that agreement. As one wag put it, “people will pretend to behave in ways that maximize the rewards, while doing what they really want to do.” We need to change what stakeholders want to do.

Eggers and O’Leary have some suggestions for achieving this, and they are worth our attention.

First, take advantage of disagreement. Today’s search for innovative technologies has become a game of winners and losers. Technologies may be adopted because of better marketing to decision-makers; adoption approaches are also subject to stakeholder “selling,” as opposed to more thorough and objective analysis. Disagreement is good, if it reflects host views regarding what to develop and how to do so; such disagreement can be addressed and resolved objectively, assuming stakeholders agree on the need for innovation and the need for real objectivity as a tool for gaining that innovation. In science, disagreement is a successful component of peer review. For the development and acquisition of technology, disagreement has become a stakeholder sport. A more collaborative approach to identifying and resolving disagreements would help, and precedents for doing so exist.

The authors also note that we should “design for the real work, not for Congress.” In their article, they point to the need for Congressional support that appears to support sufficient (though perhaps conflicting) interests, whether the solution to supporting those interests is practical. The Intelligence Community needs to propose solutions that will work, even if the “sale” to Congress and to other stakeholders is difficult and does not address every stakeholder’s needs and preferences.

Eggers and O’Leary also note the virtue of using approaches that have worked in the past, even if these approaches were tied to different objectives. The Community has access today to the Intelligence Advanced Research and Projects Activity (IARPA), patterned loosely on the Defense Advanced Research and Projects Agency (DARPA), though considerably smaller and relying largely on existing Community technology development activities. It also has access to In-Q-Tel and other channels for the rapid identification, maturation, and acquisition of innovative technologies. The Department of Defense has fielded a number of important innovations through the Advanced Concepts Technology Demonstration (ACTD) approach. We should look at all these activities to determine which lessons are worth learning and employ those lessons readily.

The authors’ call to embrace a public debate does not have an exact counterpart for the development and acquisition by the Intelligence Community of innovative technology. However, there is no reason why people of varying affiliations within the Executive Branch, Congress, and our industrial partners cannot engage in a vigorous and honest debate about the technologies we need, the benefits they convey, and the approaches necessary to develop and acquire them. Roles in this debate are important, nonetheless. The fact that the Executive Branch and Congress have different roles does not mean they have different objectives. Congress remains the ultimate legal authority, and Congress’ role as lawmaker and overseer imposes a natural
tension on most discussions with the Executive Branch. Both branches, however, and our industrial partners should recognize and share in the stakes associated with program success. A common, national interest should be kept explicitly in view in discussions regarding new technologies, and the embrace of technological and programmatic risk. Periodic meetings between community leaders and congressional members and staffers could reinforce this view of our common national interest in regard to the Community’s development and acquisition of innovative technology.

At the same time, the authors’ point can be interpreted by the Community as a call to look to the public (industry, academia, and our foreign partners and allies) as a source of good ideas and innovative technologies – and for ways to develop and acquire them. Industry invented, and continues to invent, the bulk of our technologies including those we regard as transformational; academia does much of the fundamental research that makes these technologies possible. With only five percent of the world’s population, and a growing global middle class, we would be wise to search broadly for the best ideas. In this context, we will need to discuss seriously U.S. export control laws and our preference for U.S.-source products.

The authors also point out the need to “take failure seriously” and ask that we avoid overly optimistic assessments of the necessary budgets and time to ready the technologies and operational benefits we seek. Program managers are virtually required to make estimates that are regarded as politically realistic, as opposed to programmatically realistic. They are punished by the stillbirth of their programs if they do not follow this course, even if they know that they will need to explain cost overruns and schedule shortfalls in due course. President Kennedy chose Jim Webb to head NASA. Webb decided to ask for two additional years (from 1967 to 1969), double the initial budget estimate, and then fight for these resources to make possible our first landing on the moon. This, in turn, gave us a chance to develop the technologies needed to build the systems required and meet our national objective to land on the moon. We will encounter risk, and things will go wrong, especially when we do difficult things for the first time. Being honest about these facts and learning to live with them, as opposed to punishing those who point them out, is something we have done in the past and can do again.

These observations have little to do with process and organization; they have everything to do with behavior. Almost any one of our development and acquisition models relating to technology can be made to work or to fail, depending on the behavior rules we apply and the norms we adopt.
SUMMARY AND NEXT STEPS

There are a number of mechanisms available to identify and reduce risk, including competitive prototyping, technology demonstration platforms, concept demonstrations, etc. We need to agree, expressed as a behavioral norm, that risk is inevitable and that learning to manage risk is more important than avoiding it or pretending that we can.

Intellectual isolation serves us poorly, and in today’s world, works to our disadvantage. We must be more open to sharing our technologies, with an eye toward gaining technologies from others. Post 9/11 efforts to restrict access to the United States have forced many talented people, people from whom we might benefit, away from our shores. Some might have stayed, contributing to our technological development; others might have gone to other countries, maintaining links with our own institutions that are beneficial to our technological development and helping us gain access to efforts overseas. The fact that leading facilities for smart grid technologies, solar energy, and advanced information architectures are springing up globally gives us an interest in gaining access to these resources.

Most important is the need to move beyond a punitive and confrontational behavioral norm, even as we require program managers to be honest about budget, schedule, and risk. Again, different roles in the “system” do not mean that we have different interests. We share common interests in the success of the Intelligence Community, particularly in its technological future. Program managers honest about the challenges and difficulties they face should not be punished; those who propose programmatically realistic plans and budgets should be recognized for their honesty and rewarded with the means and discretion necessary to achieve the results outlined in their plans and budgets.

Finally, the continued churn in our approach to acquisition and program management should cease. Despite the various attempts at process change, reorganization, oversight, and breach legislation, key program costs continue to escalate, schedules continue to lengthen and slip, and program success becomes more elusive. One might conclude that
an environment in which several changes in acquisition process take place within the developmental life-span of a new technology may even contribute to program failure. Within the Intelligence Community, agency after agency has seen programs canceled, deferred, or “restructured” to provide incremental increases in capability, without gaining the transformation benefits of innovation. A stable, albeit imperfect, process and oversight environment would be a better alternative. Such an environment would be a powerful adjunct to changes in how we behave within it.

Given today’s challenges, Executive Branch and congressional leaders, Members and their staffs, have an obligation to work together to build a consensus regarding strategic goals and objectives, and the behaviors necessary to achieve them. They also have an opportunity to do so. AFCEA and INSA, working collaboratively, are prepared to help facilitate this process and provide a setting for the discussions requisite to set goals and objectives, and to build more productive behaviors.

To start and to sustain this process, AFCEA and INSA are prepared to facilitate direct discussions among members of the Administration, Members and their staffs, and industry leaders to build mutual confidence and understanding regarding the need to infuse into the Intelligence Community the benefits of innovative technology. Such discussions would be designed to build more productive relationships and develop collaborative behaviors based on confidence in a shared commitment to successful technology and program outcomes and address topics such as:

- What are the most pressing technology needs facing US Intelligence?
- To what extent can Congress, the Executive Branch, and industry work together in a manner that reflects mutual commitment to the success of the Community’s adoption of innovative technology? What relationships and processes need to be developed and sustained to contribute to this success?
- Given enhanced mutual confidence, what effective models for the acquisition of innovative technology exist that could be adopted more widely? What would Congress, the Executive Branch, and industry need to do to facilitate this adoption?
- What processes can be used to ensure mutual awareness among Congress, the Executive Branch, and industry regarding innovative technologies, the opportunities they represent, and the challenges they pose?

These questions and others are important to the success of the adoption by the Intelligence Community of innovative technology, and could contribute as well to the success of other Community programs. With support from both the public and private sectors, we can move forward now.
AFCEA International

AFCEA International, established in 1946, is a nonprofit membership association serving the military, government, industry, and academia as an ethical forum for advancing professional knowledge and relationships in the fields of communications, information technology, intelligence, and global security. AFCEA supports local chapters and sponsors events worldwide, brings the solutions of industry to the requirements of government, publishes the award-winning SIGNAL Magazine, promotes education, and provides member benefits—all with the purpose of equipping it to meet government’s challenges and to further their careers. AFCEA and its chapters provide a common ground for learning that is unquestioned in its integrity and unequaled in the reach of its relationships. More than 32,000 individual members and over 1,900 corporate members support AFCEA International for the same reason: We help them succeed and enable them to serve.

The AFCEA Intelligence Committee is the Association’s major link to the U.S. Intelligence Community and the corporate and other partners who support that community. For nearly 30 years, the Committee has organized symposia that give industry, government, and the academic community the opportunity to discuss the major challenges facing intelligence and the other components of the national security framework.

The Committee itself consists of 34 members from private industry—elected as individuals and not selected to serve as representatives of their companies. Present and past members include former senior officers from all the services and civilians who, in government service, represented the major agencies and departments in intelligence, defense, law enforcement, and homeland security. In addition, representatives from nearly 20 agencies and departments serve, in full compliance with government ethics regulations, as liaisons to the Committee.

Intelligence and National Security Alliance

The Intelligence and National Security Alliance (INSA) is the premier not-for-profit, nonpartisan, private sector professional organization providing a structure and interactive forum for thought leadership, the sharing of ideas, and networking within the intelligence and national security communities. INSA has over 100 corporate members, as well as several hundred individual members, who are industry leaders within the government, private sector, and academia.

The Innovative Technologies Council is intent on tapping the rich entrepreneurial resources we can bring to bear on our national security and intelligence mission.

Thanks to this council, entrepreneurs and academics alike have a trusted environment in which to evaluate the applicability of new technologies, discuss cutting-edge concepts, and inspire innovation.
Endnotes

1. This paper is part of a series of white papers offered by both AFCEA and INSA. Previous AFCEA white papers can be found at http://www.afcea.org/mission/intel/resource.asp. Previous INSA white papers can be found at http://www.insaonline.org/index.php?id=735.

2. See: http://govinfo.library.unt.edu/wmd/report/report.html#overview


4. See: http://defenselessness/storyline?i=4540160&c=EUR&s=TOP


6. Ibid.
