

(U) Write Right: Is That Collateral, or Is It a Comment?

FROM:

of the Reporting Board (S12) Run Date: 05/18/2006

(U//FOUO) Recent articles in SID *today* have stressed the importance of including analytic insight in SIGINT reports.* Coincidentally, <u>the latest issue of the Reporting Forum</u> addressed a crucial aspect of this matter:

Collateral vs. Comments = Research vs. Analysis

- (U) Routine reviews of SIGINT reporting indicate the need to refresh the analytic workforce on the uses of Collateral and Analyst Comments. We hope the following helps ensure that the use of comments and collateral can withstand close scrutiny when sources are being examined or questioned.
- (U) USSID CR1400 (formerly USSID 300) defines these two terms thus:
- (U) Collateral is information not derived from SIGINT. It is published in written form or broacast in audio or video form by a person or organization outside the SIGINT Community. Collateral may be classified or unclassified.
- (FOUO) A COMMENT is a sentence or paragraph that contains the reporter's interpretation of the SIGINT facts. As such, it is given the same classification as those SIGINT facts.
- (U//FOUO) What these "Cs" have in common is that they are not "SIGINT fact." Our reporting classes state that collateral is intended to "support, enhance, clarify, or refute" SIGINT facts, and this is also the purpose of analytic comments to provide SIGINT customers with the benefit of our experience and knowledge. To serve the customer appropriately, though, these two classes of information must be clearly worded and distinctly labeled.
- (U//FOUO) The customer has to know everything we can provide about "what was said in the traffic" but only in a way that clearly distinguishes "what was said in the traffic" from "what we know about what was said." To put it another way, "Collateral" is information; "Comment" is knowledge. Collateral is the result of research; Comment is the result of analysis. You could call a library or other information repository for collateral, but you would want a subject-matter expert to do analysis.
- (U//FOUO) The distinction is particularly important in this day of close scrutiny of intelligence sources. Collateral can be easily referenced and usually represents a straightforward source; Comments, as analytic interpretation, are subject to close examination by policy-makers, decision-makers, law-enforcement authorities -- a range of our customers and authorities.
- (C//SI) Historically, inclusion of analysis in NSA reporting has been cyclical -- in response to customer requirements and in accordance

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with developments in the outside world. There have been times when circumstances, whether they represented our customers' requirements, or zeal in protecting NSA's sources and methods, dictated that our reports contain a straightforward transcription of foreign intercept. It's been a long time since that was the case, though.

(C//SI) It would be doing our customers a disservice to refrain, for instance, from including pertinent information such as "The minister has made this threat before, but only when speaking privately to his secretary" or "this unit's activity may be related to the upcoming Air Defense exercise." (Note that these two are straightforward Comments; a statement such as "the minister's claim conflicted with a recent press release by his government" would be a Comment that includes Collateral; both USSID CR1400 and the Reporter's Style and Usage Manual contain instructions for correct formatting of both.)

(C//SI) The complexities of our targets and our customers have grown to the point where analytic Comments unthinkable in an earlier day and age are absolutely necessary. We MUST tell our customers when we have information indicating, for instance, that the communicant is practicing disinformation, and we MUST clearly label our analytic interpretation so that, for instance, law enforcement personnel use **only** the SIGINT **facts** as leads (leads, not evidence!) in a criminal investigation.

(U//FOUO) If we do not express our analytic conclusions clearly and succinctly, we risk having a customer misinterpret SIGINT facts -- leading to consequences ranging from failure to protect U.S. forces to Congressional investigation. It is impossible to overstate the importance of this issue.

(U) "Tell me what you know, tell me what you don't know, tell me what you think; always distinguish which is which." -- Colin Powell

(U//FOUO) Addendum: Our Second Party partners appear to be grappling with this issue, as shown by the October 2005 issue of DSD's "Esquatir".

*(U) Note: See the recent articles (U) SIGINT Reporting: The Right Stuff and (U) No Comment.

(U) For earlier articles, see the Write Right '05 series.

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