

From: **Steven Aftergood** <saftergood@fas.org>  
Date: Fri, Oct 3, 2014 at 9:42 AM  
Subject: Comments on CIA schedule N1-263-14-1  
To: Request Schedule <request.schedule@nara.gov>  
Dear Ms. Hawkins,

I would like to submit the following comments on the proposed CIA records schedule N1-263-14-1.

I request that NARA reconsider its pending approval of the CIA proposal to schedule non-senior official email for disposal, and that NARA require the preservation of a broader selection of Agency email. The bases for this request are as follows.

**1. The CIA proposal would preserve only a disproportionately small fraction of Agency email.**

The CIA proposal lists only 22 senior leadership positions whose email would be exempted from the schedule. I believe that this is an exceptionally small number of positions, given the size and importance of the Agency.

If I am not mistaken, the National Archives requires the preservation of email of a much larger number of its officials, though NARA is a smaller agency than CIA.

**2. CIA has a record of destroying historically valuable documents.**

Unfortunately, CIA has repeatedly engaged in the destruction of official records that almost anyone would regard as historically valuable. This practice dates back at least to the elimination of agency records on MKULTRA, the controversial behavior modification program, in the 1970s. And it has continued at least up until the unauthorized destruction of videotapes of CIA detainee interrogation practices just a few years ago.

In light of this record, I believe that NARA should insist on a more comprehensive email preservation program than the CIA proposal would offer.

**3. The NARA appraisal asserts that any historically valuable material contained in non-senior official email will be "captured elsewhere in permanent records." But this crucial claim is not substantiated in the appraisal, and so it is hard to evaluate.** Congressional intelligence oversight staff indicate that they have made use of agency email in their oversight function, and that it is not duplicated in other sources. For this reason also, caution is indicated.

Thank you for considering my comments.

Steven Aftergood

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