

UNCLASSIFIED

**NOTE FOR:** John F. Pereira @ DA  
**FROM:** Fenton Babcock-Y  
**DATE:** 02/24/95 11:46:13 AM  
**SUBJECT:** ARRB Proposed Interpretive Regulation

[redacted] joins me in sending this response to your invitation to comment on the subject document. We have focused particularly on subsections 1400.2 (page 3) and 1400.7 (page 4).

The requirement therein for release of all materials that contain names, cryptonyms, code names, pseudonyms, and aliases needs some qualification consistent with the DCI's responsibility to protect assets of continuing national security value, liaison equities, and privacy of U.S. citizens.

Beyond the above statutory concerns of the DCI, there is one that seemingly should be countenanced by the ARRB as a prospective administrative burden on the CIA. That is the likely flow of FOIA requests from full release of such identification detail.

Why cant these considerations be recognized in the ARRB document as proper subjects of productive, responsible dialogue with the CIA?

**CC:**

UNCLASSIFIED