

Stability Operations

From Policy to Practice

BY JAMES W. DERLETH AND JASON S. ALEXANDER

The 2002 *National Security Strategy of the United States of America* led to a number of bureaucratic and policy changes. In 2004, the Department of State established the Office of the Coordinator for Reconstruction and Stabilization (S/CRS). It was charged with coordinating the Nation's postconflict and stabilization efforts. In 2005, the U.S. Agency for International Development (USAID) created an Office of Military Affairs. Its mission was to serve as the agency's focal point for civilian-military planning and interaction with the Department of Defense (DOD) and foreign militaries. On November 28, 2005, DOD published Directive 3000.05, which established stability operations as a core U.S. military mission with the same priority as combat operations. Over the next few years, DOD also issued new military doctrine—Field Manual (FM) 3–24, *Counterinsurgency*, and FM 3–07, *Stability Operations*. The latter defines *stability operations* as the “various military missions, tasks, and activities conducted outside the United States in coordination with other instruments of national power to maintain or reestablish a safe, secure environment, provide essential government services, emergency infrastructure reconstruction, and humanitarian relief.”¹

Complementing changing military doctrine, in 2009 the United States Institute of Peace and the U.S. Army Peacekeeping and Stability Operations Institute offered a civilian perspective on reconstruction and stabilization operations with its *Guiding Principles for Stabilization and Reconstruction*.² As with most doctrine, this document is broadly framed to give units flexibility in dynamic and complex environments. While useful at the strategic level, *Guiding Principles* does not help field practitioners beyond the theoretical understanding of counterinsurgency or stabilization. American experiences in unstable environments such as Vietnam, Iraq, Afghanistan, Bosnia, Kosovo, the Philippines, Somalia, and Haiti demonstrate the difficulty in effectively conducting stability operations.³ There are numerous reasons for this situation. Although addressing these issues requires strong leadership and a willingness to take on

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the formidable task of changing bureaucratic structures and procedures,⁴ there are some challenges that can be quickly mitigated.

Since both civilian and military practitioners have little or no stability operations training before they deploy,⁵ they rely on previous experience or narrow technical education. As an illustration, the vast majority of USAID Field Program Officers (FPOs) in Afghanistan

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are either humanitarian or development specialists. This means that their previous experience was focused on resolving human development challenges. Military practitioners also rely on their experience and assumptions. For example, many commanders believe proficiency in core combat skills gives Soldiers and Marines the ability to conduct stability operations effectively. This could not be further from the truth. Training in identifying sources of instability, developing missions and activities to mitigate them, and creating indicators for measuring local stability are just a few of the critical tasks required to conduct effective stability operations. Without the requisite training, military units fall back on what they know best—enemy-centric operations. As a brigade staff officer stated, current U.S. “doctrine and training requirements do not support stability operations.”⁶

Military units trained to work with the population (for example, Civil Affairs) share many of their civilian counterparts’ biases. They believe that if they improve the level of

development in an area, the area will become more stable. Often, one of the first things that Civil Affairs advisors do when they arrive in an area of operations is conduct a “needs assessment.”⁷ While a traditional needs assessment may foster development in a stable environment, research clearly shows that this is not the case in unstable environments.⁸

It should come as no surprise that mistaken assumptions lead to ineffective programming. When we asked one FPO what stability programming meant, he replied, “Good development in an unstable environment.” This is patently wrong. Research shows development programming in unstable environments often fosters more instability. At a recent international aid conference, which looked at the effectiveness of development aid in Afghanistan, practitioners from numerous development agencies concluded:

- ❖ Aid seems to be losing, rather than winning, hearts and minds in Afghanistan.
- ❖ Development and counterinsurgency policies should acknowledge the potentially destabilizing effects of aid.
- ❖ Less is more—too much aid can be destabilizing.
- ❖ Donors should differentiate between stabilization and development objectives.⁹

Programming

Effective stability operations programming requires a methodology focused on identifying and diminishing any local sources of instability, *not* addressing the perceived needs of the population. Most developing countries have myriad needs. Extremists/insurgents do not usually build roads, provide health care, or dig

wells. Yet they are able to gain support in the population. How? Extremists/insurgents are able to ameliorate the priority grievances of the population because they understand the local community.

Priority grievances are matters a significant percentage of locals—not outsiders—identify as important to the community. Examples include security, justice, or conflict resolution. Priority grievances can be needs. The differences are who assesses the situation based on common development models; and second, whether a significant percentage of the population identifies the issue as a priority. For example, in Afghanistan the Taliban gained support because they provide sharia courts to deal with crime and local disputes, both of which are major grievances in the country.¹⁰ As one member of the Afghan parliament noted: “People go to them [Taliban] because their justice is quick and seen as more effective than normal justice.”¹¹

Therefore, to stabilize an area, practitioners must be able to identify, prioritize, and diminish sources of instability (SOI), which are usually a small subset of priority grievances. They are SOIs because they directly undermine support for the government, increase support for insurgents, or otherwise disrupt the normal functioning of society. For example, in a conflict between two tribes, one tribe could ally itself with the insurgents because the rival tribe controls the local government (resources, patronage). Moreover, insurgents could take advantage of a priority grievance (land conflicts) to gain/expand influence in the community by resolving the land conflicts.

This subset must be identified through an analytical process. Of note, field analysis often determines the actual source of instability one or more steps removed from a grievance cited

by the community. For example, although locals cite water as a problem, analysis might show the underlying source of instability that created the water issue is competition between two tribes over a borehole.

SOIs usually cannot be addressed by a simple infrastructure project, such as a road. Although a road may be a part of the solution, it is the process of cooperating to build the road that is important. Another example: if the government’s failure to maintain a district irrigation system is being turned into an SOI by insurgent propaganda, a project that simply brings in an outside contractor to fix the canals will not necessarily increase support for the government. Why? If the government cannot maintain the repaired canals, then it will continue to be seen as ineffective, fostering increased popular frustration. Instead, the project should be conducted by the community—with government support—to increase the government’s and/or society’s capability and capacity to maintain the canals. Again, the goal of stability programming is identifying and targeting the local sources of instability. Once an area is stable, practitioners can address needs and priority grievances through traditional development assistance.

The District Stabilization Framework

U.S. involvement in Afghanistan and Iraq generated an extensive range of stability operations literature, which generally falls into two categories: broad strategic policy and tactical “best practices” based on an individual’s or unit’s experience. Only a few publications, such as David Kilcullen’s “28 Articles”¹² and Army FM 3–24.2, *Tactics in Counterinsurgency*,¹³ attempt to provide a coherent set of tactics, techniques, and procedures (TTPs) for units. These attempts notwithstanding, there is an

overwhelming need for a simple, standardized methodology to conduct stability operations. While some field personnel have created tools and processes that helped them stabilize an area, most have not been as successful. Recognizing the need for a comprehensive framework that allows civilian and military practitioners to identify local sources of instability, create

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activities to mitigate them, and measure the effectiveness of the activities in stabilizing the area is crucial. The USAID Office of Military Affairs led an effort that created the District Stabilization Framework (DSF). The DSF is based on the idea that in order to increase stability in an area, practitioners must first understand what is causing instability. This understanding is based on four factors:

- ❖ Instability results when the factors fostering it overwhelm the ability of the government or society to mitigate them.
- ❖ A standardized methodology is necessary to identify the sources of instability.
- ❖ Local population perceptions must be included when identifying causes of instability.
- ❖ Measures of effect (impact) are the only true indicators of success.

Through a five-step process, the DSF identifies sources of instability, designs programs to mitigate them, and measures the effectiveness of the programming in stabilizing an area.

1. Collection and Situational Awareness.

The first step is to gain a stability-focused understanding of an environment. Four types of information are required in order to understand local conditions: operational, cultural, instability, and stability factors.

2. Analysis. As anyone who has been to a doctor knows, until a malady is diagnosed, the doctor cannot prescribe an effective treatment. Similarly, to conduct effective stability operations, we need to understand what is causing instability. The analysis phase of the DSF compiles the four streams of information gathered in the collection phase and analyzes them to identify and prioritize the local sources of instability. This is accomplished through a series of worksheets. Practitioners not only identify the population's priority grievances, but also, more importantly, attempt to discern whether and how these grievances are sources of instability. This process is very different from identifying impediments to development or locating enemy forces.

3. Design. After identifying the sources of instability, the next step in the DSF process is to design activities to mitigate them. This is accomplished through a series of "filters." The first filter is stability fundamentals. This means an activity must measurably increase support for the government, decrease support for spoilers, and increase institutional and/or the community's ability to solve societal problems. If a proposed activity fulfills these three fundamentals, the next filter, stabilization principles, is applied.¹⁴ These are widely accepted best practices for designing international programs. They include local ownership, capacity-building, sustainability, selectivity, assessment, results, partnership, flexibility, and accountability. The goal of the design phase

is to create effective projects that mitigate local sources of instability. Too often practitioners implement “feel good” projects or, even worse, projects to show they did something during their deployment. Unless activities are designed to mitigate sources of instability, at best they will have no effect on stability. At worst, they will increase instability.

4. Implementation. Even if practitioners identify the local sources of instability and design appropriate mitigating activities, how the activities are implemented plays a crucial role in determining whether an activity will foster stability. For example, giving projects to one faction in a community will cause resentment in another, fostering instability. Funneling money through the wrong contractors or corrupt officials may contribute to instability. Large influxes of cash can cause inflation and corruption, which hurt the poor. The lure of inflated salaries may also draw farmers from their land, teachers from their schools, and doctors from their clinics—leading to more instability when the projects end.

5. Monitoring and Evaluation. To determine effectiveness in stabilizing an area, practitioners must be able to measure not only whether their activities were successful, but also whether their activities stabilized the area. Therefore, it is necessary to track three levels of evaluation:

- ❖ Measure of performance (MOP) identifies whether activities have been completed. For example, if the objective was to “increase police support in the community,” an activity might include police training. The MOP for this activity would be “police trained.” Note that this simply determines if an activity has been completed, not whether the police have more support in the community.

- ❖ Measure of effect (MOE) assesses whether the stability program objective has been achieved. Continuing the police example, an MOE might be more information provided to the police by the population.
- ❖ Overall stability helps determine whether the net effect of *all* activities has improved stability in the area.

A basket of standardized stability-focused indicators—which can be augmented by a few context area specific indicators—gives practitioners a good idea if an area is becoming more or less stable. DSF stability indicators currently being used in Afghanistan include:

- ❖ civilian night road movement
- ❖ government legitimacy
- ❖ population citing security as an issue
- ❖ population movement from insecurity
- ❖ enemy-initiated attacks on government security forces
- ❖ civilian casualties
- ❖ acts of intimidation against government officials.

Note that the number of indicators is not as important as what is being evaluated.¹⁵ Since the support of the population is the goal for both the government and insurgents forces in a stability operation, the metrics must focus on whether the population believes stability is improving; if their actions reflect their perceptions; and if insurgents are operating in the area.

Criticism

Critics of the DSF believe that the framework does not improve the effectiveness of stability operations because:

- ❖ It is difficult to collect local perceptions.
- ❖ It does not provide a better understanding of the local environment than traditional tools.
- ❖ It takes too much time to collect, analyze, and disseminate DSF data.
- ❖ The DSF methodology cannot be properly executed in violent environments.
- ❖ It is not linked to a higher level campaign plan and its measures of progress.

One concern is that the DSF is too difficult to implement. Common complaints include that the Tactical Conflict Survey (TCS) is used too much within a small population without doing anything to address the sources of instability (sometimes called “interlocutor fatigue”) and that soldiers cannot gather accurate information because the population tends to tell soldiers only what they want to hear. The first issue is the result of a lack of training. Survey saturation is not a weakness of the DSF methodology; it is a

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shortcoming of those applying it. As for soldiers being unable to gather accurate information from locals, two small trials in southern Afghanistan using soldiers, foreign nationals, and local nongovernmental organizations to conduct the TCS found no statistical difference in the responses gathered by each group.¹⁶

Another criticism is the DSF does not provide a better understanding of the local

environment than traditional tools and processes. The difference between the DSF and traditional tools is that the latter are focused on either identifying the needs of the population or identifying the enemy. In other words, they are not focused on pinpointing and diminishing sources of instability. The DSF gives practitioners an analytical process, TTPs to implement it, and metrics to evaluate effectiveness. Using the DSF in the Nawa District of Helmand Province, Afghanistan, 1st Battalion, 5th Marines in 2009 learned that the lack of cell phone coverage was one of the local population’s principal grievances. Following up with the “why” question of the TCS, the unit discovered phone coverage fostered a sense of stability because it allowed people to quickly find out about the security situation in neighboring areas and/or if attacks had injured family members. Based on this information, the battalion and its Afghanistan National Security Forces partners started providing security for the local cell phone towers. Improving the ability of the population to communicate led to an increase in the number of tips about improvised explosive devices and insurgent movement. Even more significantly, it increased the number of people who believed the area was stable. Battalion commander Lieutenant Colonel Bill McCollough noted, “This is something we had never thought about, as we considered phones a luxury. Without using DSF . . . we would never have known about this concern, understood why it was a concern, or done anything about it.”¹⁷

In East Paktika, Afghanistan, 3^d Battalion, 509th Infantry also used the DSF to identify sources of instability. According to the commander of Bravo Company, the DSF process “allowed me to streamline operations . . . and

Afghan boy injured by insurgent rocket calls his mother from coalition medical facility

U.S. Army (Matthew Minkema)



prioritized where to focus my efforts with what resources I had and it ensured some things that are not quick fixes (most things actually) were not forgotten.” The battalion’s operations officer noted that the DSF allowed “all of our platoon leaders, staffs, company commanders, battalion staff and battalion commander to have a good idea of the sources of instability in East Paktika. The simplicity, scalability and clarity of the system [DSF] are unmatched.”¹⁸ Because of the utility of the framework, for the first time the 509th was able to effectively target the identified and prioritized sources of instability in its area of operations.

Another concern is that the DSF takes too long to implement. Practitioners have only a limited time in theater, and there is a natural inclination to do as much as possible during deployment. However, implementing projects without first identifying sources of instability can foster the very instability practitioners were sent to diminish. Army FM 2–0, *Intelligence*, stresses that “intelligence drives operations.” This is true for both lethal and nonlethal operations. If practitioners have been educated and trained in the DSF, they can quickly identify local SOIs. Using the DSF during their deployment in Afghanistan, the British 52^d Infantry Brigade was able to identify the key sources of instability—which differed throughout the area of operations—within a month of their arrival in theater.

Targeting these SOIs, 52^d Brigade was able to see the effects of its actions to diminish them (for example, increasing support for the Afghan government and decreasing support for insurgents, within 3 months). This improvement in stability was identified both qualitatively—through changes in people’s perceptions garnered with the TCS—and quantitatively (people moving back

to their villages, more civilian road movement, decreased security incidents, and so forth).¹⁹ While a paucity of data makes it difficult to discern whether this was causation or correlation, no other unit that we are aware of can show any direct link between identifying sources of instability, targeting them, and measuring effect.

Critics of the DSF also believe practitioners cannot employ the methodology in violent environments where insurgents have a strong foothold and are thus still capable of attacking and intimidating the local population. While traditional collection methods may need to be discarded, there are still numerous ways in which to collect public perceptions. One way is simply to query returning soldiers who conduct routine patrols and converse with the local population. Practitioners may also seek out local nongovernmental organizations, international organizations, and various other local partners to gather their perspectives on the drivers of instability in the area. In short, creativity and flexibility are required for collecting local perceptions in unstable environments.

Another criticism of the DSF is that while it might measure the effectiveness of activities in fostering local stability, the DSF is not linked to higher level strategy and measures of effect. Noteworthy, the vast majority of higher level measures are not MOEs, but rather measures of performance, also referred to as outputs. As

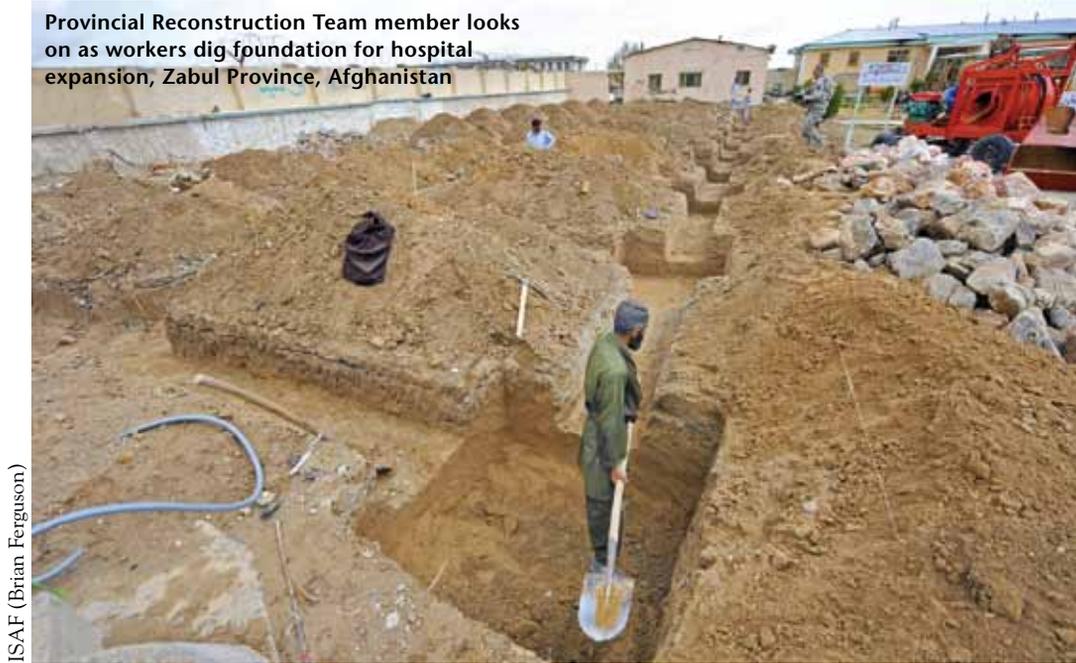
the creation of a flexible strategy that provides a broad outline rather than detailed programmatic goals and their corresponding metrics. Units can then prioritize activities based on elements of the strategy relevant to their area of operations instead of being forced to conduct activities across a broad spectrum. The Military Decision-Making Process states that decisions should be based on “top-down guidance and bottom-up refinement.” In Afghanistan, there has been little or no bottom-up refinement. One reason for this phenomenon is the lack of a common interagency methodology that identifies local causes of instability for incorporation into national level strategies. The DSF provides this capability.

A related issue is the importance of having stability-focused metrics rather than a plethora of irrelevant output indicators. In 2009, S/CRS led a process to create an Integrated Civilian-Military Support Plan for Afghanistan. It includes 11 Transformative Effects that, if attained, suggest Afghanistan will be stable. To measure progress along the way, each Transformative Effect has a series of measurable Main Efforts (95 in total) at the community, provincial, and national level.²⁰ If there are 95 main efforts, in reality there is no main effort. In addition to taking a significant amount of staff time and field resources to gather the requisite data, most of the Main Efforts are output indicators (MOPs) and do not measure whether an area is more stable. There are two main reasons for this situation. First, many people do not understand the difference between impact (MOE) and output measures. Second, sources of instability are local.²¹ None of the higher level plans for stability operations that we examined attempted to identify local sources of instability before developing lines of operations or stability MOEs.²² Consequently, the lines of effort

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noted above, MOPs do not measure whether an area is becoming more stable; they simply indicate if an activity has been implemented. The answer to the larger question of how to link local activities to a higher level strategy is in

Provincial Reconstruction Team member looks on as workers dig foundation for hospital expansion, Zabul Province, Afghanistan



ISAF (Brian Ferguson)

(LOEs) determine the sources of instability rather than the sources of instability determining the LOEs. This is a recurring problem as plans and indicators are often created either by people who do not understand stability operations or by policymakers, leaders, or practitioners who conflate their values and experiences with what locals consider important.

Most criticism of the DSF comes from those who have not been trained in the DSF or who tried to implement it from PowerPoint presentations. While the DSF is not a “silver bullet,” it is the only tool that systematically collects the perceptions of the population, integrates them into a comprehensive sources of instability analysis, designs activities based on this analysis, and measures the effect of the activities in both diminishing the SOIs and stabilizing the area.

Benefits

The District Stabilization Framework was designed by practitioners to help practitioners mitigate challenges to conducting effective stability operations. Consequently, the use of the DSF improves the ability of practitioners to conduct stability operations by:

- ❖ enabling them to distinguish among needs, priority grievances, and sources of instability
- ❖ fostering unity of effort—through its focus on identifying and mitigating the sources of instability, the DSF gives all actors in an area a common view of sources of instability
- ❖ improving programming—because it provides a common view of the sources of instability, the DSF helps practitioners prioritize activities based on their relevance to stabilizing an area rather than the practitioners’ specific “cylinder of excellence”

- ❖ measuring stability—since the DSF creates a baseline using standardized population-centric evaluation criterion, it allows practitioners to assess their progress in stabilizing an area
- ❖ improving continuity—since the typical stability operation lasts 10 to 15 years, it is crucial to have a process that fosters continuity between deployments. Because the DSF identifies the sources of instability and the effectiveness of programming to diminish them, it relieves practitioners from having to “reinvent the wheel”
- ❖ empowering field personnel—by using an analytical process to identify the local sources of instability, DSF data give practitioners an opportunity to influence higher level planning and decisionmaking
- ❖ reducing staff time and resources devoted to planning—DSF allows staff to focus on what is really important: stabilizing an area rather than conducting fruitless operations and/or implementing ineffective projects
- ❖ improving strategic communications—because the DSF identifies the issues that matter most to the population, it helps identify strategic communication themes that resonate with the population.

Overall, the DSF improves the effectiveness of stability operations because it is based on knowledge of the local environment rather than dubious assumptions.

Summary

As with any theory or doctrine, the District Stabilization Framework does not tell field personnel how to conduct stability operations in specific situations. That is the responsibility of field personnel. However, it does help overcome the natural tendency of practitioners to rely on their own experiences, which may or may not be relevant in the current environment. In addition, implementing a detailed, population-centric process greatly improves the chances of successfully stabilizing an area because it is the local population who directly experiences instability and will continue to live in the area long after foreigners depart.

To stabilize an area, two simultaneous processes must occur. First, the sources of instability must be identified and mitigated. Second, societal and/or governmental capability and capacity to mitigate future sources of instability must be fostered. Simply stated, practitioners must diminish the sources of instability while building up the forces of stability. This process is the underlying foundation of the District Stabilization Framework. Although providing guidance for his forces in Afghanistan, the words of a former commander of the International Security Assistance Forces apply anywhere in the world: “Understand the local grievances and problems that drive instability and take action to redress them.”²³ The DSF gives practitioners a tool to accomplish this mission. **PRISM**

Notes

¹ *The U.S. Army Stability Operations Field Manual: U.S. Army Field Manual No. 3-07* (Ann Arbor: University of Michigan Press, 2009), viii.

² United States Institute of Peace (USIP), *Guiding Principles for Stabilization and Reconstruction* (Washington, DC: USIP, 2009).

³ Patrick Stewart noted, “The United States is still struggling to craft the strategies, mobilize the resources, and align the policy instruments it needs to help reform and reconstruct failing, failed, and war-torn states.” See “The U.S. Response to Precarious States: Tentative Progress and Remaining Obstacle to Coherence,” Center for Global Development, July 2007, available at <www.cgdev.org/content/publications/detail/14093/>.

⁴ These include training shortfalls, short-deployment cycles, inappropriate programming resources, and misguided measures of success.

⁵ Office of the Special Inspector General for Afghanistan Reconstruction (SIGAR), *U.S. Civilian Uplift in Afghanistan Is Progressing but Some Key Issues Merit Further Examination as Implementation Continues* (Washington, DC: SIGAR, October 26, 2010), 12.

⁶ U.S. Army major, interview by James A. Derleth, October 2008, Bagram, Afghanistan.

⁷ This assessment is called SWEAT–MSO (sewer, water, electricity, academic, trash, medical, security, and other). See Field Manual (FM) 3–24.2, *Tactics in Counterinsurgency* (Washington, DC: Headquarters Department of the Army, April 2009), 7–21.

⁸ Edwina Thompson, *Winning “Hearts and Minds” in Afghanistan: Assessing the Effectiveness of Development Aid in COIN Operations*, report on Wilton Park Conference 1022, March 11–14, 2010, available at <www.eif.eu/resources/library/1004WPCReport.pdf>.

⁹ *Ibid.*, 2–3.

¹⁰ Alissa J. Rubin, “Expanding Control, Taliban Refresh Stamp on Afghan Justice,” *The New York Times*, October 7, 2010, available at <www.nytimes.com/2010/10/08/world/asia/08taliban.html>; or Emma Graham-Harrison, “Weak Afghan Justice Bolstering Taliban,” Reuters, December 17, 2010, available at <<http://in.reuters.com/article/idINIndia-53620620101216>>.

¹¹ Karim Talbi, “Shadow Taliban Government Rules Afghans’ Lives,” *Agence France-Presse*, January 26, 2010, available at <www.google.com/hostednews/afp/article/ALeqM5gW19u3ZojrsONNK419tiX5TVijyA>.

¹² David Kilcullen, “28 Articles: Fundamentals of Company Level Counterinsurgency,” Joint Information Operations Center, January 14, 2007, available at <www.au.af.mil/au/awc/info-ops/iosphere/iosphere_summer06_kilcullen.pdf>.

¹³ FM 3–24.2, *Tactics in Counterinsurgency*.

¹⁴ The term *stabilization principles* was coined by former USAID administrator Andrew S. Natsios. See Andrew S. Natsios, “The Nine Principles of Reconstruction and Development,” *Parameters* 35, no. 3 (Autumn 2005), 4–20.

¹⁵ David Kilcullen, “Measuring Progress in Afghanistan,” unpublished manuscript, 2009, 7.

¹⁶ This might be unique to Afghanistan: 30 years of instability have acclimatized the population to seeing soldiers. However, even if there were a bias against soldiers in parts of the world, civilian foreign nationals or local nationals could implement the TCS.

¹⁷ Bill McCollough, email to James A. Derleth, May 2010.

¹⁸ Patrick Altenburg, 3^d Battalion, 509th Infantry, email to James W. Derleth, May 2010.

¹⁹ Richard Wardlaw, “52 BDE’s Use of TCAPE,” presentation at Quantico, VA, October 2008. Wardlaw was in charge of reconstruction and stabilization for the British 52^d Infantry Brigade during their November 2007–April 2008 deployment in Afghanistan.

²⁰ Karl W. Eikenberry and Stanley A. McChrystal, *United States Government Integrated Civilian-Military Campaign Plan for Support to Afghanistan*, August 10, 2010, available at <www.comw.org/qdr/fulltext/0908eikenberryandmcchrystal.pdf>.

²¹ Tip O'Neill would certainly agree. He used to note that "all politics is local."

²² For example, Eikenberry and McChrystal note that the mission of tactical District Support Teams is "primarily execution focused," 30.

²³ Stanley A. McChrystal, *ISAF Commander's Counterinsurgency Guidance*, August 25, 2009, available at <www.nato.int/isaf/docu/official_texts/counterinsurgency_guidance.pdf>.