Propaganda: Can a Word Decide a War?

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Two years ago, the Lincoln Group, a government contractor, sold un-attributed pro-United States stories to Iraqi newspapers in an effort to win the war of ideas and counter negative images of the US-led coalition. The mainstream American press, members of Congress, and other government leaders immediately and loudly condemned these actions as “propaganda” and contrary to the democratic ideals of a free press. A Pentagon investigation, however, found that no laws were broken or policies violated. Nor was the term propaganda ever used by the Lincoln Group or US military in its efforts to apply the information element of power in a war in which the center of gravity (in Clausewitzian terms) is defined as “extremist ideology.” Which begs the question: How do you fight a battle of ideas with one hand tied behind your back? The ways and means of winning that battle are both informed and ultimately restricted by an innate US culture that struggles with democratic ideals seemingly at odds with the use of information to win over hearts and minds even while the enemy maintains no such inhibitions.

Propaganda is “any form of communication in support of national objectives designed to influence the opinions, emotions, attitudes, or behavior of any group in order to benefit the sponsor, either directly or indirectly.” Certainly propaganda has been used from time immemorial as a tool in warfare. But it is only since the US experience of World War I that this rather innocuously defined term has become pejorative in the national psyche. A review of recent history is necessary to examine the challenges of today and open a window to understanding the dilemma of balancing principles of a free, democratic society with the need to counter lies and half-truths in an effort to establish trust and credibility. A look through this historical lens allows focus on the requirement for strong national leadership capable of driving the
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procedural and cultural changes necessary to ultimately win the generational ideological struggle the United States currently faces.

**Propaganda and the Two World Wars: Shaping American Attitudes**

The US experience employing information as an element of power during both World Wars still colors the way Americans view the federal government’s foreign and domestic information programs. America’s collective experience with what may be called government propaganda—a term that the US government eschewed from the start—has been mixed. This reflects the tensions between the branches of government, and also the resistance of the national media to any restraints on their operations. Congress, from the beginning, developed a wariness of organizations that publicized the personality and role of the President to overseas audiences. Media became skeptical of “canned” government information releases that reflected the administration’s perspective and were provided as news.

When the United States finally entered the World War in April 1917 it had already been the target of propaganda efforts for two and a half years. The British influence operation based at Wellington House in London used several means, including the Reuters news agency, to reach target audiences worldwide. Sir Gilbert Parker, who had wide familiarity with America, directed the work targeted at the United States. His technique was aptly characterized by James Squires as being a “gentle courtship” versus a “violent wooing.”

4 It was subtle, understated, and highly effective. Specific British disinformation programs were also aimed directly at Germany. These included efforts to incite anti-American feelings there through false “news” items such as reports of the seizure of German seamen, shipping, and other property before the United States entered the war.5

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16 Parameters
Despite each side’s efforts to sell its cause, the United States remained officially neutral while carrying on substantial trade, including armaments, with Britain. President Woodrow Wilson narrowly won reelection in November 1916, capturing just half of the more than 18 million votes cast, with a campaign proclaiming, “He kept us out of war.”

Beginning 1 February 1917 Germany resumed unrestricted submarine warfare. US ships were sunk with loss of life; the Germans had wagered that they could defeat Britain and France before the United States could effectively mobilize. Wilson still resisted war, but on 1 March the Zimmermann Telegram, offering German support to Mexico in exchange for parts of the American Southwest, became public. Wilson asked for and received a declaration of war on 6 April 1917.

US Propaganda and World War I

The Secretaries of State, War, and the Navy immediately sent the President an insightful memo which recommended the creation of the Committee on Public Information (CPI). They understood the magnitude of the task required to mobilize disparate elements of the population behind the war effort and the critical role information played in achieving it:

America’s great present needs are confidence, enthusiasm, and service, and these needs will not be met completely unless every citizen is given the feeling of partnership that comes with full, frank statements concerning the conduct of the public business.⁶

A later report (April 1918) by the Army General Staff, “The Psychological [sic] Factor: Its Present Application” is an early twentieth century paraphrasing of the instruments of national power (diplomatic, information, military, economic) and a recognition of the importance of the information element, noting that the “strategic equation” of war has four factors, all coequal: combat, economic, political, and psychological.⁷

George Creel, a pro-Wilson newspaperman, headed CPI, which became popularly known as the Creel Committee. The organization as a whole continued to evolve throughout the war in an effort to meet specific needs. Wilson had great confidence in his own ability to go directly to the American public and later the people of the world through his pronouncements, and he used CPI’s apparatus to assist him in doing this.

From the start the CPI had Wilson’s full confidence and attention. It was also unified: both domestic and overseas propaganda fell within CPI’s domain. Creel disassociated CPI’s work with a term that was just starting to come into common use:
We did not call it “propaganda,” for that word in German hands had come to be associated with lies and corruptions. Our work was educational and informative only, for we had such confidence in our case as to feel that only fair presentation of its facts was needed.8

James Mock and Cedric Larson noted in their 1939 history of CPI’s activities, Words That Won the War, that Americans came to associate propaganda as a term with the work of German agents and saboteurs in the United States.9

CPI’s organization evolved quickly. Its activities included development and distribution of various print materials, primarily in the form of pamphlets and press releases. It commissioned movies specifically for the war effort, producing such silent films as “Pershing’s Crusaders.” Later films took on a sharper anti-German edge, including such titles as “The Prussian Cur.” Movie houses also provided one of the venues for a new corps of public speakers. These so-called “four-minute men” eventually numbered more than 75,000 individuals who spoke on themes developed by CPI covering the range of preparedness activities. In 1918, as the war continued, the four-minute men were encouraged to include stories of enemy atrocities. CPI also facilitated development of education packages for schools and universities addressing the war’s aims and the nature of the enemy. The packages later came to be criticized for their one-sidedness and simplicity.

Overseas, Creel dispatched representatives to cities such as Berne, the Hague, Madrid, Copenhagen, Mexico City, and Buenos Aires, where they could reach various neutral populations. Operatives also reached the German and Austrian publics from bases in neutral neighboring nations via German-language newspapers and travelers. The CPI representatives issued news releases, pamphlets, and posters, and distributed American movies with news or allied advertising attached. Although CPI rules prohibited payment of bribes or subsidies to foreign news organizations its operatives did so in Spain and elsewhere.10 CPI could move information very quickly to target audiences worldwide when needed. When Wilson gave his “Fourteen Points” speech in January 1918, CPI representatives in Saint Petersburg and Moscow received the text by way of transatlantic radio and telegraph, and were able to pass it to the Russian man on the street via posters and handbills just four days later. CPI eventually became an instrument with which Wilson could bypass the political leadership of both enemy and friendly countries and talk directly to the populace. By the end of the war and the start of peace negotiations, CPI made Woodrow Wilson and his ideas famous worldwide; a fact that did not please his opponents in Congress.11

CPI’s domestic efforts during the war met with a high-degree of success: draft registration—the first since the tumultuous call-up of the Civil
War—occurred peacefully, bond drives were over-subscribed, and the American population was, generally, supportive of the war effort. CPI operations in foreign capitals enabled Wilson to relate his war ideals and aims to a world audience. Indeed, Wilson was taken aback by this effective dissemination of his peace aims and the world’s reaction. He remarked to George Creel in December 1918, “I am wondering whether you have not unconsciously spun a net for me from which there is no escape.”

The Interwar Years: Propaganda Introspective

The post-war appraisal of CPI was darker. George Creel compiled his official report on the committee’s activities in June 1919, and soon after authored a public account, *How We Advertised America*. But at home and overseas, the reality of the peace lagged behind Wilsonian aspirations. The Allies forged a treaty that many Americans and others believed unfair and incomplete. Americans also started to reflect on an ugly side to the war enthusiasm in the United States. Germans and their culture had been vilified. Sauerkraut had become liberty cabbage, hamburger was Salisbury steak, but more seriously, teaching the German language and subject matter in schools became viewed as disloyal, and authorities banned it in some states. There were incidents of physical attacks and even lynchings of suspected German sympathizers and war dissenters. The Attorney General enlisted volunteer “loyalty enforcers” who carried official-looking badges and were encouraged to report those of their neighbors who spoke out against the war.

Brett Gary, in his book *The Nervous Liberals*, recounts the range of reaction to American propaganda and also the wartime restraints on free speech and political dissent. Felix Frankfurter, future appointee to the Supreme Court, co-authored the critical “Report Upon Illegal Practices of the U.S. Justice Department” in 1920. It charged (among other things) that the Creel Committee helped create what the report termed a “vigilante atmosphere” that was part of an environment in which civil liberties and the democratic process were undermined. Propaganda as an instrument had become respected, or feared, as a highly effective force giving “the power to capture men’s hearts and to bypass their rational processes.”

Newspaper columnist Walter Lippmann, an early advocate of America’s entry into the war, examined democratic processes and institutions in a new light. He had become concerned with the way that public opinion could be manipulated. His 1920 book *Liberty and the News* examined the role of public consent in the development of government policy. Earlier theories held freedom of the press was integral to functioning democracy, but Lippmann saw that a free press by itself would not serve this purpose if it could be manipulated through prejudice or by outside organizations.
In 1922 he took his examination farther in the book *Public Opinion*, questioning the premise of an informed and rational citizenry, even if balanced, reliable information was available. Lippmann believed that the average person has neither the time nor the ability to make informed opinions about the questions of public policy. He or she must rely instead on specialists who are freed by their education and training from prejudices and stereotypes. John Dewey, the American philosopher and educator, later termed *Public Opinion* “the most effective indictment of democracy as currently conceived ever penned.”

Across the Atlantic, 35-year-old Austrian war veteran Adolf Hitler produced another perspective. He published the first volume of *Mein Kampf* (“My Struggle”) in 1925 outlining his belief that Germany had been defeated from within by invidious Allied propaganda, as well as subversive elements within the German society—particularly German Jews. Chapter 6, titled “War Propaganda,” specifically and concisely addressed what Hitler called the real lessons in the field. These, he felt, were to be learned from British and American examples during the war. The short chapter presents a cynical, amoral primer on publicity techniques in the service of a dark objective:

The very first axiom of all propagandist activity: to wit, the basically subjective one sided attitude it must take toward every question it deals with . . . . What, for example, would we say about a poster that was supposed to advertise a new soap and that described other soaps as “good”? . . . The whole art [of propaganda] consists in doing this so skillfully that everyone will be convinced that the fact is real, the process necessary, the necessity correct, etc . . . . The masses are slow moving, and they always require a certain time before they are ready to even notice a thing, and only after the simplest ideas are repeated thousands of times will the masses finally remember them . . . For instance a slogan must be presented from different angles, but the end of all remarks must always and immutably be the slogan itself. Only in this way can propaganda have a unified and complete effect.

Hitler later created the “Ministry for Popular Enlightenment and Propaganda,” appointing Dr. Joseph Goebbels as minister.

*World War II: Propaganda and Misinformation*

When the United States entered WWII its public information efforts were very much shaped by the experiences of some 20 years earlier. President Franklin D. Roosevelt had witnessed the Creel operation at close range from his position as Under Secretary of the Navy and did not want a similar centralized organization. American opinion leaders were also increasingly concerned by what they saw as an organized, sophisticated, and highly successful German propaganda effort in the early 1930s, increasingly aimed at North
and South America. Some were concerned about the susceptibility of large segments of the population to foreign propaganda and misinformation, others about the effect of comprehensive US government influence organizations on American society and its political balance. These included members of the media who did not care for the Creel style of a centralized clearinghouse and censorship for stories concerning the World War. There was also continued congressional suspicion of any effort that could be viewed as serving to publicize the administration.

Still, as the menace of Nazi Germany increased, people such as Archibald MacLeish, the Librarian of Congress, and Pulitzer Prize-winning playwright Robert Sherwood (who read Mein Kampf and understood Hitler’s aims) called for an American information response. Roosevelt proceeded cautiously. William J. Donovan, Wall Street attorney and WWI Medal of Honor recipient, became the chief of the Office of Coordinator of Information in mid-1941 which soon included a Foreign Information Service under Sherwood. Donovan was impressed with the effectiveness of Goebbels’ propaganda efforts in Germany and believed that propaganda should include deceit in order to fight Nazi methods. Sherwood believed that American propaganda must be truthful in order to not compromise credibility and national ideals. He would, however, later admit that his product often selectively concentrated on one part of the truth.

In early 1942 Milton Eisenhower (younger brother of Dwight D.) surveyed wartime information needs for the Bureau of the Budget. Eisenhower was also cautious of the Creel Committee experience, but recommended the creation of an Office of War Information (OWI), that would address both domestic and foreign information requirements. President Roosevelt accepted the recommendation and selected popular and respected radio news broadcaster Elmer Davis to head up the new organization which would include the Overseas Branch and a Domestic Branch.18

There were several significant differences between the OWI and its CPI predecessor. Some of these were by design but others reflected the style of the President. FDR was highly adept at communicating to the public, doing so directly via radio in his addresses and “fireside chats.” In 1941 60 million radio receivers encompassed 90 percent of the American population.19 Roosevelt was, however, not entirely comfortable with a formal propaganda apparatus and Davis, unlike Creel, did not have direct access to the President. Unlike Wilson, Roosevelt provided little political cover for OWI in its skirmishes with the Congress, and often preferred to be ambiguous regarding policy guidance.

Operating in the absence of such policy guidance the OWI staff, particularly in the Foreign Branch, sometimes got ahead of stated government pronouncements, or it responded with what its members thought American
policy should be. For example, with regard to Italian dictator Benito Mussolini’s initial departure from Italy in 1943, the OWI broadcast statements that King Victor Emmanuel and his premier remained essentially fascist, directly contradicting British and American intentions. A domestic product published by OWI, “Battle Stations for All,” sought to explain the rationale for several wartime rationing and control measures. Congressional critics voiced loud objections because some of the controls it outlined had not yet been approved.

The Foreign Branch inaugurated publication of an attractive magazine, *Victory*, aimed at overseas audiences. Its first issue featured an article titled “Roosevelt of America, President - Champion of Liberty,” with a prominent picture of FDR over an American flag background. This incensed congressmen who viewed OWI as a Roosevelt publicity organ. Leaders such as Senator Harry Byrd vowed to investigate US propaganda efforts and Congress, in a precursor to later restrictions, prohibited dissemination within the United States of products intended for foreign audiences.

Some OWI techniques came under very pointed criticism. The use of pseudonyms by OWI authors in their articles was denounced by prominent newspapermen, such as Arthur Krock of the *New York Times*. The *New York World Telegram* said that such an incident “smells of dishonesty.” President Harry S. Truman disbanded OWI in 1945.

Congress passed the Smith-Mundt Act in 1948, recognizing the importance of marshalling US cultural and information outreach efforts in support of national engagement in what was coming to be called the Cold War. But it carefully stipulated that such programs, fashioned for foreign audiences, could not be disseminated at home.

*Propaganda Today: Fighting Back While Fighting the Past*

American attitudes and concerns about propaganda today sound eerily familiar to the criticism voiced during the first half of the twentieth century. That historical context and the way it shaped opinion may likely be the reason that information as an element of power remained mostly absent from recent official government strategy documents until the May 2007 publication of a *National Strategy for Public Diplomacy and Strategic Communication*, well over five years after 9/11. Even that important and well-intended document does not directly address information as power but rather considers the ways in which the United States should wield it. In fact, one needs to go back to the Reagan Administration to find the most succinct and pointed mention of information as power in formal government documents. National security documents since that time allude to different aspects of information but lack a specific definition. Given this dearth of official documentation,
Drs. Dan Kuehl and Bob Neilson proposed the following definition of the information element:

Use of information content and technology as strategic instruments to shape fundamental political, economic, military, and cultural forces on a long-term basis to affect the global behavior of governments, supra-governmental organizations, and societies to support national security.\textsuperscript{25}

This is not to imply that the US government doesn’t recognize the value and importance of information to wield power, but it appears the term “propaganda” keeps getting in the way.\textsuperscript{26} The Lincoln Group experience described earlier is but one example. “After disclosure of the secret effort to plant articles, angry members of Congress summoned Pentagon officials to a closed-door session to explain the program, saying it was not in keeping with democratic principles, and even White House officials voiced deep concern. . . . The question for the Pentagon is its proper role in shaping perceptions abroad.”\textsuperscript{27}

But even prior to this the Department of Defense showed both its need to use information as power and its squeamishness toward accusations of propaganda use. The Pentagon established the Office of Strategic Influence (OSI) within weeks of 9/11. Its stated purpose was simple: to flood targeted areas with information. It didn’t take long for the mainstream media to discover the office and posit that “disinformation” was being planted abroad and would leak back to the American public. These claims of propaganda were all it took to doom OSI which was shut down soon after, even though subsequent investigations proved that information it provided was, in all cases, truthful.\textsuperscript{28}

This conundrum, where the United States must fight using propaganda but faces internal criticism and backlash whenever it does, allows for an information environment that favors an adversary bent on exploitation with his own strategic propaganda. The historical use of information as power was primarily limited to nation-states. Today a blogger can impact an election, an Internet posting can recruit a terrorist, and an audiotape can incite fear in the strongest of nation-states, all with little capital investment and certainly without the baggage of bureaucratic rules, national values (truthful messaging), or oversight. Propaganda is the weapon of the insurgent franchised cell. It costs little, is easy to distribute, and has near-immediate worldwide impact. The improvised explosive devices that have killed and maimed so many US troops in Iraq are propaganda weapons. They are manned by two insurgents: the detonator and the videographer. Their impact is not the tactical kinetic victory but the strategic propaganda victory. In a broader sense, terrorist organizations have learned the lessons of propaganda well. Hezbollah integrated an aggressive strategic propaganda effort into all phases of the summer 2006 conflict with Israel. “Made in the USA” signs sprung up on Lebanese rubble immediately after
Getting Past the Propaganda Barrier

So the question remains how the United States can succeed in wielding information as power and overcome American societal attitudes colored by our own history and that of some of our most hated enemies. How do you work within a bureaucracy that is cumbersome and slow, when nimbleness of responsiveness is essential to counter propaganda? The answer lies in both procedural and cultural change and the leadership necessary to force that change.

Procedurally, the United States must approach strategic communication as an integral part of policy development. To do otherwise will doom the United States to remain on the defensive in the war of ideas, something that has not worked well to date. The resulting communication plans will still be viewed as propaganda by the definition provided at the beginning of this article, but having such a plan in the development process permits strategists to anticipate potentially negative foreign reaction and possesses the proactive ability to explain the policy to all audiences. On the other hand, poor policy will not be salvaged by any message or theme that attempts to explain it. As former Pentagon spokesperson Torie Clarke said, “You can put a lot of lipstick on a pig, but it’s still a pig.”

Failure to quickly and accurately react to propaganda cedes the international information environment to the enemy. “Quickly” is often measured in minutes, not hours, days, or weeks. The reality of instant communications means that individuals on the ground at the lowest tactical level should be empowered to respond to propaganda to the best of their ability. This requires a cultural change on the part of both individual “messengers” and their leaders. Training and education can provide the baseline competencies to equip Americans (soldiers, diplomats, or others) to appropriately respond to propaganda. But the driving force in affording the freedom to do so will come from senior
leaders willing to delegate the authority necessary. This comes with an understanding that “information fratricide” may occur and with an expectation that to react otherwise takes the United States out of the information fight. A culture of information empowerment down to the lowest levels needs to be inculcated among senior government officials, permitting for clear guidance provided to subordinates, risk mitigation procedures established, and, perhaps most importantly, acceptance that this will not be a zero-defect undertaking.

Winning hearts, minds, trust, and credibility, in the end, requires a local approach. Consider a major US metropolitan area. Neighborhoods take on their own personalities, driven by socio-economic factors and ethnic and racial identity, among other considerations. Value sets are different among the diversity of communities that make up the melting pot that is a large American city. It should not be difficult then to understand how it is nearly impossible to influence perceptions among audiences in a foreign country with a “one size fits all” set of messages and actions. Long-term US presence and engagement in foreign nations allows for a deeper understanding of cultural differences. These cultural underpinnings combined with the hard work of relationship building allow for effective tailoring of messages and the successful identification of key influencers. Engagement is the key whether it is by US soldiers in their area of operations, diplomats on Provincial Reconstruction Teams, US Agency for International Development workers, or nongovernmental organizations. Where no US presence exists, efforts must include recruiting key individuals for US exchange programs, people who will tell this nation’s story upon their return home.

The National Strategy for Public Diplomacy and Strategic Communication discusses the “diplomacy of deeds.” The US hospital ship Mercy completed a five-month humanitarian mission to South and Southeast Asia late last year resulting in improved public opinion of the United States in those predominately Muslim nations. Similar increases in favorability ratings occurred following the US response to the Indonesian tsunami and Pakistani earthquake. These low-cost, high-visibility efforts pay significant dividends in improving the image of the United States abroad. Leaders need to understand that strategic communication is more than programs, themes, and messages; it is actions as well.

But this analysis doesn’t answer the dilemma of the need for the United States to fight and win in the information environment and its inherent aversion to the “propaganda” such a fight entails. The answer lies in both the process and culture supported by a nation’s leadership. A US governmental organization selling articles (under Iraqi pseudonyms) directly to Iraqi newspapers, regardless of the legality, is asking for trouble in today’s information environment. Supporting the government of Iraq in an effort to
tell its own story is a much better strategy. Leading from the rear in the information war still gets the message told while avoiding any direct confrontation with democratic ideals. On the other hand, the Office of Strategic Influence had the potential to provide focus, resources, and potentially significant results in the information war, but a few misguided articles in the mainstream press was all it took to bring about its quick demise. And so, ultimately, countering American angst over the effective use of propaganda will require strong stewardship. National leaders need to admit that the United States actually does want to (truthfully) influence foreign audiences. To do anything less abrogates the information battlespace to America’s adversaries. Attempts to influence foreign audiences, however, will almost certainly produce some bleedover to American audiences. That needs to be accepted and, with knowledge of forethought, preparations can be made to proactively educate the media with regard to these information efforts and any potential backlash. The recent initiatives to incorporate strategic communication into the policy development process are encouraging in this regard.

Conclusion

The National Strategy for Public Diplomacy and Strategic Communication is a positive step in permitting the United States to compete against propaganda and proactively tell its story. Defeating an enemy whose center of gravity is extremist ideology requires nothing less than an all-out effort in this regard. But changing perceptions, attitudes, and ultimately beliefs is a generational endeavor. It remains to be seen whether processes can be instituted that endure beyond political cycles or if the nation’s leadership is capable of changing the current culture of reticence related to the application of information as power. Only then can the information battlefield be leveled and the battle of ideas won.

NOTES

3. Joint Chiefs of Staff, Department of Defense Dictionary of Military and Associated Terms, Joint Publication 1-02 (Washington: Department of Defense, 22 March 2007), 430. While there are numerous definitions found in any number of publications, this one is chosen because it reflects the accepted US government definition.
5. American newspaperman H. L. Mencken, in Berlin for the Baltimore Sunpapers prior to April 1917, observed the effect on the German population of false reports by the British news bureau Reuters of American mobilization and vessel and property seizures in the United States.
7. Ibid., 238.
9. Mock and Larson, 236. After the war it was determined that the massive explosion at “Black Tom Pier” in Jersey City was the work of German-financed saboteurs. The incident on Sunday, 30 July 1916, destroyed munitions bound for Great Britain, rattled the Statue of Liberty’s structural support, and caused massive property damage as far away as Times Square, but fortunately little loss of life. See the following Internet sites: http://www.state.nj.us/dep/parksandforests/parks/liberty_state_park/liberty_blacktomexplosion.html, and http://www.njcu.edu/programs/jchistory/Pages/B_Pages/Black_Tom_Explosion.htm.
10. Mock and Larson, 238.
11. Ibid., 235.
18. Winkler, 29. Donovan argued unsuccessfully against losing the Foreign Information Service. His intelligence and espionage organization became the Office of Strategic Services, forerunner to the Central Intelligence Agency.
19. Ibid., 60.
20. Ibid., 97.
22. While the *National Strategy for Public Diplomacy and Strategic Communication* describes the “ways” and “means” of using information as power, it does not define the information element of power as a foundational starting point for those descriptions.
24. The *National Strategy for Combating Terrorism* refers frequently to the “battle of ideas” but again without a foundational description of how the United States wields information as power.
26. Interestingly, the US government avoids using the term “propaganda” in any of its official publications (short of the DOD definition). Instead, the terms “psychological operations,” “information operations,” “public diplomacy,” and “strategic communication” are found, apparently as an ironic twist to change American perceptions favorably toward the use of information to influence foreign audiences.
30. The Department of Defense produced a roadmap as an outcome of the Quadrennial Defense Review in September 2006 that defines strategic communication as “focused USG processes and efforts to understand and engage key audiences in order to create, strengthen, or preserve conditions favorable to advance national interests and objectives through the use of coordinated information, themes, plans, programs and actions synchronized with other elements of national power.” See *Doctrine for the Armed Forces of the United States*, Joint Publication 1, 14 May 2007, Chp. 1, I-9.

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