

American Cold War Realism and the Policy of *Détente*

Kerboua Salim

*Faculté des Lettres, Sciences Humaines et Sociales
Université Mohamed Khider de Biskra.*

Abstract:

In the late 1960s - early 1970s, President Richard Nixon and his National Security Adviser Henry Kissinger designed and put into motion a new policy. Via *Détente* the United States attempted to find an alternative to militarist containment of the Soviet Union. That change in foreign policy owed much to the realist theory of international relations principally based on balance of powers and real world accommodation.

This paper examines the policy of *Détente* within the Cold War perspective. It probes the American policy planners' motives behind the support of a more lenient conduct toward the former Soviet Union and their line of reasoning based on a realistic approach. Accordingly, this paper looks into

the milieu in which the option of *Détente* emerged: the spiralling arms race that was underway, the United States' military problems in Southeast Asia, and the arrival of a new administration led by the Nixon-Kissinger duo with their new approach to diplomacy.

المُلخَص:

في نهاية الستينات من القرن الماضي، الرئيس الأمريكي ريتشارد نيكسون ومستشاره للأمن القومي هنري كيسنجر صمما وطبقا سياسة الانفراج. عن طريق هذه السياسة الخارجية الجديدة، حاولت الولايات المتحدة الأمريكية استعمال طريقة بديلة عن احتواء الاتحاد السوفييتي عسكريا. هذا التغيير في السياسة الخارجية يستند من النظرية الواقعية في العلاقات الدولية وأساسا من مفهوم توازن القوى والتكيف مع الواقع العالمي.

هذا المقال يفحص سياسة الانفراج ضمن أبعاد الحرب الباردة. يفحص دوافع صانعي القرار الأمريكيين التي وراء دعم سلوك أكثر ليونة اتجاه المعسكر السوفييتي ومقاربتهما الواقعية للصراع. ولذا يبحث هذا المقال في الوسط الذي برزت فيه سياسة الانفراج: السباق نحو التسلح، المشاكل العسكرية الأمريكية في جنوب شرق آسيا، وقدم إدارة جديدة يقودها الثنائي نيكسون-كيسنجر ومقاربتهما الجديدة في مجال الدبلوماسية.

1. Introduction

American Cold War policy (1946 – 1989) was mainly one of deep ideological confrontation with the Communist bloc. Containment and roll back constituted the core strategies undertaken by the United States' decision takers to curb a Soviet expanding power. However, the Cold War era was also characterized by infrequent attempts from one camp to conciliate the other through diplomatic, security, and economic agreements. In the early 1970s, the policy of Détente undertaken by President Richard Nixon and his National Security Adviser (and later his State Secretary) Henry Kissinger was the most significant attempt by the United States of America to try to go out of the militarist containment of the Soviet Union. That change in foreign policy design and implementation owed much to the Realist theory of international relations principally based on balance of powers and real world accommodation.

The present paper focuses on the policy of Détente (in the 1970s) within the Cold War perspective. It examines the American policy planners' motives behind the support of a more lenient conduct toward the former Soviet Union and their arguments and line of reasoning based on a realistic approach. Accordingly, this paper looks into the milieu in which the option of Détente emerged: the spiralling arms race that was underway, the United States' military problems in Southeast Asia, and the arrival of a new administration led by the Nixon-Kissinger duo with their new approach to diplomacy.

2. Motives behind the Détente Policy

One may wonder why American policy planners shifted, between 1969 and 1972, from a militarist containment of the Soviet Union to a more moderate posture. The question may seem incongruous and the answer obvious if one considers the chasm the United States was in with respect to war in Vietnam. But perhaps other factors as well came into play.

2.1. The Arms Race

Since George Keenan's *Long Telegram* in 1946^[1] and the drafting of NSC-68 by Paul Nitze and his team in 1950,^[2] the United States' relations with the Soviet Union basically relied on the perception that the USSR constituted a threat to the United States. This belligerent perception of the Soviet Union was the basis for the development of an uncompromising foreign policy and a nuclear-based security strategy.

Therefore, for more than a quarter of a century, the policy of containment was the cornerstone of the American strategy vis-à-vis the Soviet Union. However, the political, economic and regional military containment of the Soviet Union did not prevent this latter from engaging in a heated arms race with the United States.

The pinnacle of this strategic military competition culminated in 1969 with more than 10,000 American nuclear warheads and a little less in the Soviets' hands. Still at that time, both American and Soviet policy makers – among them Anatoly Dobrynin, Soviet Ambassador to the USA from 1962 to 1986 – recognized that the United States had

a huge nuclear superiority over the USSR.^[3] Indeed, the offensive strategic forces of the United States relied on the three legs of the nuclear triad: land-, sea- and air-based nuclear weapons.

Table 1: American and Soviet nuclear arsenals, 1967-1969^[4]

	January 1967	September 1968	November 1969
United States			
ICBMs*	1,054	1,054	1,054
SLBMs*	576	656	656
Bombers	650	565	525
TOTAL	2,280	2,275	2,235
USSR			
ICBMs*	500	875	1,140
SLBMs*	100	110	185
Bombers	150	150	145
TOTAL	750	1,135	1,470

*ICBM: intercontinental ballistic missile (land-based missiles)

*SLBM: submarine-launched ballistic missile (sea-based missiles)

Table 1 clearly shows an American nuclear advantage in 1969. It should be added that in 1970, the United States deployed MIRV (multiple independently targetable re-entry vehicles) systems. MIRV technology, then an exclusive US technology, multiplied the number of warheads by three for ICBMs and by ten for SLBMs. It could be noticed, however, that the Soviet Union was catching up US strategic capabilities. Indeed, the table shows a clear dynamic in Soviet weapons production as compared with virtual static situation in the American case.^[5]

Shortly before the Détente period, US Defence Secretary Robert McNamara described the United States' nuclear arsenal as almighty. In 1967, he asserted that America enjoyed flexible, highly reliable strategic weapons that were able to penetrate Soviet defences. In addition, he reiterated that, while dealing with a possible Soviet threat, security estimates assumed all plausible worst cases. On the other hand, Robert McNamara declared that the Soviet Union neither possessed nor would possess any "first strike capability"^[6] against the United States. He also asserted that the Communist bloc was not attempting to acquire that potential.^[7]

Indeed, because of economic and technical considerations, the Russian ABM (Anti Ballistic Missile) system which the Russians started to develop in 1962 – and designed to protect the Soviet Union against possible American nuclear strikes – was never completed, not reliable in the 1960s and 1970s, and to a great extent, vulnerable to United States' ICBMs (Inter-Continental Ballistic Missiles).^[8] We should also note that the American ABM system did not have a better effectiveness.^[9] Détente brought about the ABM treaty of 1972 that limited development and improvement of national missile defence.

That American strategic self-confidence came out of the Mutually Assured Destruction (MAD) doctrine. Indeed, the United States overtly declared it would never undertake a first strike on the Soviet Union. It decided instead to develop a second-strike potential of such magnitude that no Soviet first strike would avoid retaliation.^[10] This strategy became known as Mutually Assured

Destruction. Undeniably, the development of a second-strike capability left the concept of first-strike capability pointless since any aggressor would be certain to endure nuclear reprisals.

By the late 1960s, Americans and Russians finally woke up to realize that they had, in that arms race, reached the terrifying point of being able to exterminate one another. This rude awakening and subsequent awareness of a suicidal policy helped convince the two superpowers – and especially the United States – to initiate a more rational approach to one another.

Additionally, the arms race was not the sole factor behind a reappraisal and change in American diplomacy and security strategy. The ruinous Vietnam War coupled with a period of economic challenges convinced American decision makers to turn towards a more realistic, thus moderate, posture.

2.2. The Vietnam Mess and the Economic Element

By the beginning of the 1970s, in addition to the escalating arms race, the United States was sinking in an endless, costly and unpopular war in Vietnam.

Since the Gulf of Tonkin Resolution in 1964, the Vietnam War was damaging the American economy, feeding inflation and driving up the budget deficit. In 1968, the United States' budget deficit reached more than \$24.2 billion, approximately the cost of the Vietnam War for that year. In addition, increased military spending fuelled inflation and the war's costs exacerbated the United States' balance of payments problems which put huge pressure on America's

gold reserves. These problems did not reassure United States' allies in Europe and Japan. Doubts arose about American foreign policy priorities and the United States' ability to cope with them.^[11]

In addition, it was clear that North Vietnam was getting much more aid from the Soviet Union than from China.^[12] In this way, the American leaders hoped that a rapprochement with the Russians would put pressure on the North Vietnamese leaders to bring them to adopt a compromise for the settlement and the ending of the war.^[13]

By the late 1960s, the United States endured severe economic and financial troubles in great part due to the Vietnam War as aforesaid, but also because of changing patterns in the World economy. The growing economic power of Japan and Europe had a great impact on the international trade and eroded the United States' position in the World market. As a result, the late 1960s witnessed an American economy much more vulnerable to external forces.^[14] Richard Crockatt, of East Anglia University, notes that

[T]he United States and the Soviet Union were each subject to challenges within the spheres which until then they had dominated: the United States within the world capitalist system and the Soviet Union within the world communist system.^[15]

Thus, the Vietnam War imbroglio and economic reasons also contributed significantly to have the United States seek alternative approaches to deal with a changing world in which it had to review and reorganize its world strategy.

3. Détente: a Realistic Approach to the US -Soviet Conflict

Before analysing the United States' approach to Détente, a definition of the term is needed. Détente in the field of international relations and diplomacy can be defined as a "relaxation of tensions between two or more hostile powers" which "may lead to further rapprochement, or improved relations."^[16] It is an "improvement in the relations between two or more countries who have been unfriendly."^[17]

Thus, advocates of Détente regarded it as another more realistic approach to deal with the Soviet Union. By the late 1960s and early 1970s, according to Ambassador Dobrynin, American and Russian leaders subscribed to the view that it was no longer sensible or safe to conceive their nuclear relationship as a contest. They acknowledged that they had to stop that uncontrolled arms race.^[18] Indeed, for Henry Kissinger, the fact of the matter was that the policy of Détente came from a realization that international tensions – and especially resentment between the United States and the Soviet Union – could not be relaxed should the two superpowers continue to follow the path of arms race. Henry Kissinger believed that the most important element of the United States policy towards the Soviet Block was to limit strategic weapons competition. He came to the realization that:

When nuclear arsenals reach levels involving thousands of launchers and over 10,000 warheads, and when the characteristics of the weapons of the two sides are so incommensurable, it becomes difficult to determine what combination of numbers of strategic

weapons and performance capabilities would give one side a military and political superiority. ...The prospect of decisive military advantage, even if theoretically possible, is politically intolerable; neither side will passively permit a massive shift in the nuclear balance.^[19]

Therefore, one of the main goals of the Nixon Administration was to get rid of the security dilemma that was confining the two superpowers in a spiralling and endless arms race.

The security dilemma is the most common theoretical explanation for the occurrence of an arms race between superpowers. According to political scientist Alan Collins, the ‘security dilemma’ occurs and dramatically develops when states – in this case the United States and the USSR – create insecurity in one another as they seek to gain security. The defence policies they therefore pursue, consisting in developing and accumulating arsenals, paradoxically have the opposite effects to that intended. In fact, each one fearing the growing capabilities of the other; and rather than generating security, they fuel their own insecurity.^[20]

The Nixon-Kissinger’s policy of arms control (exemplified in the SALT negotiations) and political rapprochement with the Soviet Union aimed at breaking that security dilemma. Furthermore, Kissinger’s objective was to create in the USSR a perception of “an equality of power.” American leaders thought that if the Soviets perceived a parity in arms, and especially in strategic weaponry, they would less likely to pursue and develop an aggressive military build

up, and hence, be more moderate.^[21] If Kissinger's approach was this, it was perhaps because he admitted – as Robert McNamara before him – that the Russians were largely behind in technological military capacities. So, Kissinger supposed that a balance of power in which the USSR might get the “perception” of being militarily equal to the United States would prevent it from embarking on a build-up unnecessary and hazardous for both countries, and especially for the United States.

Politically, American decision takers considered that the core responsibility of the West – and especially the United States of America – was to hinder the Soviet expansionist opportunities. However, the problem, according to Kissinger, was that the United States was dealing with a “system too ideologically hostile for instant conciliation and militarily too powerful to destroy.”^[22] Yet, Henry Kissinger still thought that the real threat was not the Soviet nuclear arsenal but the insidious expansion of the Soviet sphere and the growing influence it had on emerging nations of the Third World. To him, the actual menace was geopolitical, not military.^[23]

For its American initiators, the policy of Détente was in no case meant to replace the long-lasting post-war American strategy of containment. Rather, it was intended to be a less hostile, less expensive and subtler method of containing and managing Communist power.

4. Détente: the Practice

The successive American administrations – from Richard Nixon to Jimmy Carter – would implement the policy of Détente through political, military and economic agreements. United States policymakers wanted to link economic, political and strategic issues together. They wanted to elaborate a flexible system of rewards and punishments by which Washington could moderate Moscow's behaviour and hamper its ambitions. This tactic was called "linkage." In actual practice, the United States would link positive incentives as arms control technology transfers, economic cooperation and grain sales to expected Soviet positive responses in other areas.

This did not mean that trust and confidence would govern American-Soviet relations. On the contrary, American policymakers had no illusions that global competition between the two camps would fade away. As political scientist Keith A. Dunn noted, because of their obvious original historical and ideological divergences, both the Soviet Union and the United States had never accepted the concept of Détente as the elimination of all competition and disagreements between each others.^[24] Nevertheless, Americans expected that such carrot-and-stick-based linkage method would set up new rules of the game and recognize spheres of influence of each. In addition, for pragmatic American policymakers including Richard Nixon and Henry Kissinger, pulling the Soviet Union into a network of agreements, and therefore giving Russians a stake in the status quo, would create a more stable structure of peace. Finally, they presumed

that getting the Soviet Union involved in a network of economic and cultural cooperation might reveal new vistas to the Russian society.^[25]

Furthermore, as abovementioned, the policy of Détente was not only meant to slow down the nuclear competition between the two global superpowers; it had also challenging geopolitical aims. Kissinger asserted that because of geopolitical and economic changes, Richard Nixon's aim was to conduct the transition of America's position in the world from "hegemony to leadership." Such a design could be achieved only by building a consensus in the international political scene.^[26] Henry Kissinger himself had this view before he assumed the post of National Security Advisor. In 1969, he asserted that:

In the years ahead, the most profound challenge to American policy will be philosophical: to develop some concept of order in a world which is bipolar militarily but multipolar politically.^[27]

He believed that the United States' interests required that this latter exert more leadership than dominance.

The policy of Détente was thus put into motion to meet these challenges. It relaxed tensions between the two superpowers for a small decade, but international issues as well as domestic actors obstructed and capsized the bilateral rapprochement and arms control negotiations.

5. Détente: Achievements and Limits

What did Détente really bring to the United States, and to which extent was it valuable? Proponents of this policy look into the most

significant accomplishments realized thanks to the Détente. The achievements of Détente according to them were the negotiations to limit the development of strategic weapons, the improvement of trade relations with a questionable progress regarding European security and human rights concerns.

Proponents of Détente also argue that the main accomplishment of Détente relates first and foremost to the issue of arms control. The Strategic Arms Limitation Talks from 1969 to 1972 and from 1972 to 1979 realized important advances in restricting nuclear weapons development. The Nixon, Ford and Carter administrations took on a series of rounds with the Soviet Union in a wide range of issues from the BPA (Basic Principles Agreement) in May 1972, intended to warm tensions, limit conflicts, and pave the way to economic cooperation, to the SALT II Treaty signed in June 1979.

Table 2: US Versus USSR Strategic Forces in 1972 and 1979 ^[28]

Nuclear Strategic Forces at the time of SALT I, 1972		
	USA	USSR
ICBMs*	1054	1607
SLBMs*	656	740
Strategic bombers	450	200
Nuclear warheads	5700	2500
Nuclear Strategic Forces at the time of SALT II, 1979		
	USA	USSR
ICBMs*	1054	1400
SLBMs*	656	950
Strategic bombers	350	150
Nuclear warheads	9200	5000

*ICBM: *intercontinental ballistic missile (land-based missiles)*

*SLBM: *submarine-launched ballistic missile (sea-based missiles)*

Table 2 shows two major points during the period in which Détente governed American – Soviet relations (in the 1970s). Firstly, by 1979, the SALT treaties (the Interim Agreement and the ABM Treaty of 1972, the Vladivostok Accords of 1974, and SALT II in 1979) proved to be fruitful in the sense that they brought to a halt the production of ICBMs, SLBMs and nuclear bombers. It also permitted the Soviet Union to reach a “perceived” nuclear parity concerning the number of missiles.

Secondly, Table 2 also confirms an unquestionable nuclear superiority of the United States over its rival in the total of warheads. This is explained by the increase of MIRVs deployed by the United States in the 1970s and not comprised in the SALT agreements. This second point also demonstrates that, despite the break in missiles and bombers production, SALTs did not effectively put an end to the arms race since the development and deployment of MIRVs, especially on the American side, continued and increased all along that period.

Also in the realm of defence, the ABM (Anti-Ballistic Missile) Treaty of 1972 illustrates a major achievement of Détente. The two superpowers designed the treaty to curb the deployment, testing, and use of national missile systems conceived to intercept incoming strategic or long-range missiles (ICBMs and SLBMs). The treaty banned National Missile Defence (NMD) systems i.e. ABM systems in the United States and Soviet Union. The two countries adopted this bilateral treaty to avoid a possible nuclear war and limit the nuclear arms race. Indeed, logic held that if each side remained defenceless to

a nuclear attack, and if nuclear retaliation to a first strike was guaranteed, then, rationally speaking, neither side would have any drive to consider launching a nuclear strike. In a certain sense, the ABM Treaty codified the Mutually Assured Destruction doctrine that was dominating global security strategy.^[29]

In the political field, the Conference on Security and Cooperation in Europe resulted in the Helsinki Accords of August 1975. These multilateral accords smoothed away the fear of a nuclear conflict and recognized the post-war partition of Europe. They also focused on the respect of human rights, including freedom of expression, religion, and travel.^[30]

For the United States, in the economic field, a rapprochement with the Soviet Union opened the way for new economic opportunities. The two countries signed a wide range of economic and bilateral agreements. The United States became the Soviet Union's leading trading partner. For instance, the two countries exchanged an estimated \$1.5 billion dollars worth of goods in 1973. And in 1974, Soviet-American trade totalled over \$1 billion dollars. The United States also granted loans to fund ambitious projects in the Soviet Union such as industrial complexes and pipelines.^[31]

The aforementioned achievements should obviously not veil the limits of Détente in some crucial issues of world politics. The rivalry between the two superpowers continued in the 1970s. Regional conflicts, such as the 1973 Arab-Israeli War or the civil war in Angola in which both superpowers were deeply involved, testify that the struggle for power and influence lasted even while there was a will to diminish tensions.

6. The Demise of Détente: an International Explanation

Hence, why did Détente fail in the international political arena? Despite historical breakthroughs in arms control and wishes to make ‘a structure of peace,’ one of the main destructive forces behind the collapse of Détente was the diverging conceptions the United States and the Soviet Union had of this policy.

Rather than seeking appeasement for appeasement and beyond the achievement of specific agreements on arms control, the United States regarded Détente as a subtle global process with geopolitical objectives, the chief one being the moderation of the Soviet ambitions in the Third World. Thus, the United States devised conceptual tools as ‘Linkage’ to manage, on the one hand, the Soviet Union’s emergence as an actual nuclear superpower capable of matching American military power, and on the other, to control its political influence in Third World countries.

For its part, the Soviet Union viewed Détente as an opportunity to gain acknowledgement of its superpower status. What is more important, and what perhaps led Détente to a stalemate was that the Russians saw no contradiction between a warming of relations with the Americans and the continuation of geopolitical competition with an increase of influence in the Third World[32] which was the very opposite purpose Détente was intended from the viewpoint of the United States.

So, according to some Western historians,[33] Détente was inconsistent from the very outset because of “fundamental philosophical disjunction between the two superpowers.”[34] Détente could not succeed in world politics since it was merely a new form of bilateral

relationship between the USA and the USSR, incompatible with the lasting global ambitions of the two superpowers.

7. Conclusion

Thus, a combination of international factors ranging from the arms race to the ruinous Vietnam War, together with a growing geopolitical power of the Soviet Union and an erosion of American economy led Richard Nixon and his Security Advisor Henry Kissinger, and later Presidents Gerald Ford and Jimmy Carter, to adopt and pursue a new strategy based on the Realist school of international relation theory.

Multipolarity, the balance of power and arms control were the core concepts of that approach. To Americans, the objectives of Détente were the preservation of the United States' world leadership and the containment of Communism through political and economic measures.

However, the deep ideological differences of the two superpowers, and their diverging and antagonistic views over that policy of rapprochement led to a stalemate by the end of the 1970s and to the resurgence of the Cold War confrontation. Whether this policy was a success or not at the international level is still debatable among historians.

References and Endnotes:

1. George Frost Keenan, American diplomat and scholar, is considered as the theorist of the policy of Containment. While in the United States Embassy in Moscow in 1946, he wrote and sent an analysis of the Soviet Union, the "Long Telegram."
2. The document warned the Truman administration of the growing military expansion of the Soviet Union. The document asked for a significant increase in defence spending and laid the foundations of a militarist containment of the Soviet Union.
3. Anatoly Dobrynin. Interview by CNN, March 1997, www.cnn.com/SPECIAL/cold.war/episodes/
4. Ibid.
5. Richard Crockatt. *The Fifty Years War: The United States and the Soviet Union in World Politics, 1941-1991*, London: Routledge, 2002, p. 215.
6. Robert McNamara, "Mutual Deterrence." Speech, San Francisco, September, 18, 1967.
7. Ibid.
8. Union of Concerned Scientists, "The History of Russia's ABM System," October, 27, 2002. www.ucsusa.org/global_security/missile_defense/
9. Union of Concerned Scientists, "From Nike-Zeus to Safeguard: US Defenses Against ICBMs, 1958-1976," March 14, 2003. http://www.ucsusa.org/global_security/missile_defense/
10. John Swift, "The Arms Race." *The Palgrave Concise Historical Atlas of the Cold War*. New York: Palgrave MacMillan, 2003, p.80. And also "Defense Systems," Encarta Encyclopaedia article, *Encarta CD-ROM*, Microsoft Corporation, 2002.
11. David S. Painter, *The Cold War: An International History*. London: Routledge, 2002, p. 68.
12. William H. Chafe, *The Unfinished Journey, America Since World War II*. Oxford: Oxford U P, p. 400-1.
13. Ibid. pp 401-4.
14. Richard Crockatt, *The Fifty Years War*. op.cit. pp 208-209.
15. Ibid, p. 209.
16. Détente." *Berkshire Encyclopaedia of World History*. Vol II. William H. McNeill. Sr ed. Great Barrington, Massachusetts: Berkshire, 2005, p. 519.
17. "Détente." Peter Holmes. Ed. *Dictionary of Politics and Government*. London: Bloomsbury, 2004, p. 75.
18. Anatoly Dobrynin, op.cit.
19. Henry Kissinger. Statement before the Senate Foreign Relations Committee, September, 19, 1974, in Thomas G. Paterson. Ed. *Major Problems in American Foreign Policy*. Vol. II, 3rd edition, New York: Heath, 1989, pp. 633-634.
20. Alan Collins. *The Security Dilemma and the End of the Cold War*. Edinburgh: Edinburgh University Press, 1997, p. 1.
21. Stanley Hoffman. "Flawed Design and Diplomatic Disaster," in Thomas G. Paterson, *Major Problems in American Foreign Policy*, op.cit. p. 661.
22. Ibid.
23. Henry Kissinger. Interview by CNN, March-April 1997, www.cnn.com/SPECIAL/cold.war/episodes/
24. Keith A. Dunn, "Détente and Deterrence: From Kissinger to Carter." *Parameters*. Vol. VII, n°4 (1977), p. 47.
25. "Nixon, Kissinger and the Détente Experiment." Encyclopaedia Britannica article. Britannica CD-ROM, 1999.
26. Henry Kissinger. "Between the Old Left and the New Right," *Foreign Affairs*, (May/June 1999), Council of Foreign Relations.
27. Henry Kissinger as quoted in Richard Crockatt, *The Fifty Years War*, op.cit, p. 204.
28. Mary Beth Norton et al, *A People and a Nation: a History of the USA*. Vol. 2, 2nd edition, Boston: Houghton Mifflin Company, 1986, p. 931.
29. Mark A Ruse, "Reflections on the 1972 Antiballistic Missile Treaty and National Missile Defense," *Aerospace Power Journal*, spring 2002.
30. Michael L. Dockrill and Michael F. Hopkins. *The Cold War, 1945-1991*. 2nd Ed. New York: Palgrave MacMillan, 2006, p. 120.
31. Ibid.
32. Richard Crockatt, *The Fifty Years War*, op.cit, p. 204.
33. To make his case, Richard Crockatt cites Bowker, Williams and Garthoff.
34. Ibid.