

The Soviet Union and International Terrorism*

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I. Introduction

Normally subject to “benign neglect” in the conduct of U.S. foreign policy, international terrorism has suddenly and dramatically become the focus of intense scrutiny. In the wake of the hostages’ release after 444 days of captivity in Iran, President Reagan has warned of swift and effective retribution against future incidents involving terrorism,¹ and Secretary of State Alexander Haig has charged that the Soviet Union is seeking to “foster, support and expand” terrorist activities around the world, and is “training, funding and equipping the forces of terrorism.”² Secretary Haig has also stated that “international terrorism will take the place of human rights in our concern because it is the ultimate of [*sic*] abuse of human rights.”³

Prior to Secretary Haig’s remarks, others had alleged that the Soviet Union was engaging in widespread support of international terrorism.⁴ According to newspaper reports appearing shortly after the Secretary’s remarks, however, the Department of State and U.S. intelligence agencies were able to come up with little hard evidence to back up his charges.⁵ To some this merely reflected the low level to which U.S. intelligence agencies’ capabilities had fallen after earlier revelations of unsavory domestic and international operations. The data are available, such critics claim, in the files of Western European intelligence agencies, but these agencies are reluctant to disclose it because this would risk confrontation with the Soviet

*The views expressed in this article are those of the authors and do not necessarily reflect those of the Naval War College.

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¹N.Y. Times, Feb. 3, 1981, at B13, col. 3.

²*Id.*, Jan. 29, 1981, at A10, col. 1.

³*Id.*

⁴See especially Moss, *Terror: A Soviet Export*, N.Y. Times Magazine, Nov. 2, 1980, at 42.

⁵N.Y. Times, Feb. 9, 1981, at A3, col. 4; Washington Post, Feb. 7, 1981, at A10, col. 1.

Union, as well as with Arab countries in the Middle East.⁶ An American journalist, Claire Sterling, claims to have this data, and has at this writing published an article based on it and adapted from a soon-to-be published book.⁷

Future disclosures of data may clarify the situation. In the meantime, we will attempt in this article to evaluate the attitude and practice of the Soviet Union toward international terrorism, insofar as they may be gleaned from available evidence. But first, we must turn to the difficult task of attempting to define "international terrorism."

II. International Terrorism: A Definitional Quagmire

In any discussion of international terrorism, one has to deal with the problem of its definition. Or, rather, one has to attempt to deal with the problem of its definition, because this is a problem that neither statesmen nor scholars have resolved to widespread satisfaction. There are, indeed, many who believe that the term is indefinable and ought to be dropped—at least for purposes of analysis and efforts to combat those acts loosely termed international terrorism.⁸ Nonetheless, despite its deficiencies, the term "international terrorism" appears to be here to stay. As such, it has been used—depending upon the particular perception—to cover three categories:

1. *State Terrorism*. This category comprises the use of terror by governments, including, for example, torture, genocide, and the assassination of political enemies abroad by the use of diplomats or other persons enjoying special status by virtue of their governmental functions. The international dimension is supplied by the fact that these activities violate internationally recognized norms of human rights. Indeed, another, and most commentators believe preferable, approach to this problem is to view it as a matter covered by international human rights law.

2. *Terrorism in Armed Conflict*. Included in this category are acts inflicting terror in the context of "armed conflict" covered by the law of war. Examples would include the killing of defenseless prisoners of war and the wanton slaughter of civilian noncombatants.

3. *International Terrorism by Private Individuals*. A working (although by no means uniformly agreed upon) definition of this category would be "the threat or use of violence by private persons for political ends, where the conduct itself or its political objectives, or both, are international in

⁶Washington Post, Feb. 7, 1981, at A10, col. 1.

⁷Sterling, *Terrorism Tracing the International Network*, N.Y. Times Magazine, March 1, 1981, at 16, adapted from Ms. Sterling's book, *The Terror Network*, to be published in April by Reader's Digest Press/Holt, Rinehart and Winston.

⁸See, e.g., Baxter, *A Skeptical Look at the Concept of Terrorism*, 7 AKRON L. REV. 380 (1974).

scope."⁹ Another working definition might be Professor Paust's description of terrorism as "the purposive use of violence or the threat of violence by the perpetrator(s) against an instrumental target in order to communicate to a primary target a threat of future violence so as to coerce the primary target into behavior or attitudes through intense fear or anxiety in connection with a demanded (political) outcome."¹⁰ As an example where the instrumental and primary targets might be the same person or group of persons Paust cites an attack on a military headquarters in order to instill terror or intense anxiety in the military elite of that headquarters.¹¹ He notes further that "the instrumental target need not be a person since attacks on power stations can produce a terror outcome in the civilian population of the community dependent upon the station for electricity."¹² So defined, international terrorism might include—assuming the presence of a terror outcome, a political goal, and an international dimension—the explosion of bombs in the market place, the taking of hostages, attacks on international business persons and diplomats, the hijacking of airplanes, the possible use of nuclear materials or chemical and biological weapons, and attacks on energy resources such as pipelines, off-shore oil rigs, and tankers carrying oil or natural gas.

These categories are not, of course, mutually exclusive, and the line between them may be difficult to draw. For example, it may be difficult to determine whether a particular terrorist act has been committed by a private individual acting on his own or by one serving at the direction of a government. Similar difficulties may arise in determining whether a situation should be characterized as an "armed conflict" subject to the law of war. Further, acts of state terrorism may create a political, economic or social milieu that precipitates acts of individual terrorism. Despite such complexities of compartmentalization, these categories are useful for present purposes, and we will employ them in our analysis of Soviet practices regarding international terrorism.

III. The Soviet Union and State Terrorism

Historically, the Soviet Union presents the paradigmatic case of state terrorism. The use of systematic government terror to torture or kill enemies of the communist regime in Russia was first installed by Lenin¹³ and utilized most extensively by Stalin as documented in Alexander Solzhenitsyn's *The Gulag Archipelago*. With Stalin's death and the disclosure of Stalin's crimes by Nikita Khrushchev before the Twentieth Party Congress in 1956,

⁹See LEGAL ASPECTS OF INTERNATIONAL TERRORISM xv (A.E. Evans & J.F. Murphy, eds. 1978).

¹⁰Jordan J. Paust, *Terrorism and the International Law of War*, 64 MILITARY L. REV. 1, 3-4 (1974).

¹¹*Id.*

¹²*Id.*

¹³A. PARRY, *TERRORISM FROM ROBESPIERRE TO ARAFAT* 131 (1976).

the brutality of Soviet repression of its opponents eased considerably, although egregious violations of fundamental human rights still occur on a regular basis. Nonetheless, it is doubtful whether the brutality of current Soviet state terror matches that employed by a number of other states—including some oriented toward the West, such as El Salvador¹⁴ and Guatemala.¹⁵

Several states enjoying the strong support of the Soviet Union, such as Libya, Iraq, and Syria, have recently sponsored the assassination of their enemies abroad, sometimes under the cover of diplomacy.¹⁶ There is no evidence, however, that the Soviet Union encouraged these states in these assassinations or that it trained the assassins. Rather, these states appear to have acted alone, pursuing their own goals and interests.

The main thrust of recent charges, of course, has related not to state terrorism but to terrorism in armed conflict and to private acts of international terrorism. It is to the first of these that we turn in the next section.

IV. The Soviet Union and Terrorism in Armed Conflict

One shocking example of Soviet terrorism in armed conflict has gone largely unnoticed. According to reports,¹⁷ the Soviet Union in its battles in Afghanistan is ignoring all restraints on armed conflict placed by the law of war and by humanitarian principles. There, both the Soviet Union and the Afghan rebels have been fighting with no quarter asked or given. The Russians have reportedly bombed villages indiscriminately with no concern for civilian casualties, dropped rebel prisoners from helicopters, and used lethal chemicals against the guerrillas. All of these practices, of course, violate applicable Hague Regulations and Geneva Conventions on the law of war, as well as the 1977 Geneva Protocols not yet in force. For their part the rebels allegedly torture, mutilate and sometimes skin alive the Russian soldiers they capture.

There is no doubt that the Soviet Union is involved in sponsoring so-called wars of national liberation in many parts of the globe. Indeed, they make no effort to hide the fact.¹⁸ These insurgency groups at times engage in terrorist activities. Some members—not all—of the Palestine Liberation Organization (PLO) have done so, as have the former guerrillas in Rhodesia, now Zimbabwe, the leftist guerrillas in El Salvador, the South West People's Organization (SWAPO) in Southwest Africa or Namibia, and the leftist rebels in Turkey, to name a few. There is evidence that the Soviet

¹⁴ See T.D. Allman, *Rising to Rebellion*, Harper's, March 1981, at 31.

¹⁵ See Power, *Behind the Killings in Guatemala*, N.Y. Times, Feb. 17, 1981, at A19, col. 1.

¹⁶ See J. de Vernisy, *The New International Terrorism*, World Press Review, Nov. 1980, at 23

¹⁷ Wall St. J., Aug. 29, 1980, at 1, col. 1.

¹⁸ See N.Y. Times, Feb. 9, 1981, at A3, col. 4, referring to a diplomatic note from the Soviet Union to the United States defending a Soviet right to assist national movements of independence.

Union has given military training to such groups as well as arms and ammunition. There is little evidence that they were specially trained in or encouraged to use terrorist techniques.¹⁹ The evidence regarding the PLO indicated that their training has been in conventional military techniques.²⁰ To be sure, this support by the Soviet Union for insurgency movements itself constitutes a blatant violation of fundamental norms of the United Nations Charter,²¹ and the Soviet Union should be held accountable for it.

There is also a basic question regarding the usefulness of terrorism to an insurgency movement. Leninist strategies of insurgency place little emphasis on terror tactics or the provocation of government counterterror.²² One must remember that terror is the weapon of the weak and a two-edged sword. If a primary goal of an insurgency movement is to "win the hearts and minds of the people," terrorism may be counterproductive. This is especially true if insurgency tactics result in the deaths of persons perceived by the mass of the population to be innocent. This may allow the government in power to employ highly repressive counterterrorist tactics with the approval of the majority of the population. This is what happened to the Tupamaros in Uruguay²³ and to the rebels against British authority in Malaya.²⁴ There is also evidence that terrorist tactics in Northern Ireland and England have undermined the Irish Republican Army (IRA) cause.²⁵ Terrorism directed against the shah's regime in Iran also had little effect.²⁶

On the other hand, the Soviet Union is one of the few states which have expressly argued that prohibitions against—much less criminal sanctions for—terrorist acts should not apply to wars of national liberation.²⁷ It will be remembered that the kidnapping and killing at Munich on September 6, 1972, of eleven Israeli Olympic competitors by Arab terrorists, as well as a number of other spectacular acts of terrorism, resulted in the U.N. General Assembly considering the problem of international terrorism and in the introduction by the United States on September 25 of a Draft Convention

¹⁹N.Y. Times, *id.*

²⁰N.Y. Times, Oct. 31, 1980, at A1, col. 3.

²¹The Declaration on Principles of International Law Concerning Friendly Relations and Co-operation among States in Accordance with the Charter of the United Nations, Oct. 1970, U.N.G.A. Res. 2625 (XXV), 25 U.N. GAOR, Supp. (No. 28) 121, U.N. Doc. A/8028 (1971), which is generally regarded as an authoritative interpretation of the U.N. Charter, provides in pertinent part:

Every State has the duty to refrain from organizing, instigating, assisting or participating in acts of civil strife or terrorist acts in another State or acquiescing in organized activities within its territory directed towards the commission of such acts, when the acts referred to in the present paragraph involve a threat or use of force.

²²O'Neill, *Insurgency: A Framework for Analysis*, INSURGENCY IN THE MODERN WORLD 1, 27 (B. E. O'Neill, W. R. Heaton, & D. J. Alberts, eds. 1980).

²³See MILLER, URBAN TERRORISM IN URUGUAY: THE TUPAMAROS, *id.*, at 137.

²⁴See, e.g., THOMPSON, DEFEATING COMMUNIST INSURGENCY (1966).

²⁵B.E. O'Neill, W.R. Heaton, and D.J. Alberts, eds., *supra*, note 22, at 276-77.

²⁶*Id.*, at 277.

²⁷See U.N. Ad Hoc Committee on International Terrorism, Observations of States Submitted in Accordance with General Assembly Resolution 3034 (XXVII), U.N. Doc. A/A.C.160/1 and Adds. 1-5 (May-July 1973).

for the Prevention and Punishment of Certain Acts of International Terrorism.²⁸ In introducing the Convention, and in subsequent debates on it, U.S. representatives attempted to obviate the concern of some member states that the Convention was directed against wars of national liberation. To this end, they pointed out that the Convention was limited in its coverage to "any person who unlawfully kills, causes serious bodily harm or kidnaps another person . . .," that the act had to be committed or take effect outside of the state against which the act was directed, unless such acts were knowingly directed against a nonnational of that state, and that the act must not be committed either by or against a member of the armed forces of a state in the course of military hostilities. Despite these efforts, many member states opposed the U.S. initiative, viewing it as directed generally against revolutionary movements. As a result, the General Assembly failed to take any action on the U.S. Draft Convention.²⁹ The Soviet Union lobbied intensively for this result.

V. The Soviet Union and Private Acts of International Terrorism

There appears to be little hard evidence, at least at this writing, that the Soviet Union is directly supporting such free-lance terrorists as the Red Brigades in Italy, the Baader-Meinhoff gang and its successors in West Germany, the Japanese Red Army, or Armenians who assassinate Turkish diplomats.³⁰ Substantial evidence exists that Libya has sponsored a variety of terrorist organizations, but it is not clear the extent to which Libya is acting at Soviet direction. There is some evidence also that Czechoslovakia has trained Italy's Red Brigades, that North Korea has trained Japanese Red Army members, that Cuba has trained terrorists for action in Latin America, and that South Yemen has trained a wide assortment of terrorists.³¹ One may reasonably conclude that these states are not acting wholly on their own initiative. Whether their activities constitute, as asserted by Claire Sterling,³² part of a "worldwide terror network aimed at the destabilization of Western democratic society" and directed from Moscow is more debatable.

By way of defense, the Soviet Union points to its strong support for international measures against aircraft hijacking and sabotage,³³ attacks on dip-

²⁸Draft Convention for the Prevention and Punishment of Certain Acts of International Terrorism (Draft Convention to Prevent the Spread of Terrorist Violence), U.N. Doc. A/C6/L. 850 (1972).

²⁹For discussion, see Murphy, *International Legal Controls of Terrorism: Performance and Prospects*, 63 ILL. BAR. J. 444 (1975); Franck & Lockwood, *Preliminary Thoughts Toward an International Convention on Terrorism*, 68 AM. J. INT'L L. 69 (1974).

³⁰See N.Y. Times, Feb. 9, 1981, at A3, col. 4. *But cf.* Sterling, *supra*, note 7.

³¹See especially Sterling, *supra*, note 7 and Moss, *supra*, note 4.

³²Sterling, *supra*, note 7, at 19.

³³The Soviet Union is a party to the 1970 Convention for the Suppression of Unlawful Seizure of Aircraft (Hague Convention), 22 U.S.T. 1641; T.I.A.S. No. 7192 and the 1971 Con-

lomats,³⁴ and, most recently, hostage-taking.³⁵ With respect to aircraft hijacking and attacks on diplomats, the Soviet Union has taken a strong stand, since it has often itself been a victim of such actions; indeed, the Soviet Union has accused the United States of failing to take adequate precautions to protect its diplomats in New York and Washington.³⁶

As to hostage-taking, the record of the Soviet Union is mixed. In 1976, after Israel's raid at Entebbe, Uganda, to save Israelis held hostage there, the Soviet Union supported a draft resolution introduced in the Security Council by the Organization of African Unity (OAU) that would have had the Council condemn Israel's "flagrant violation of Uganda's sovereignty and territorial integrity" and demand that Israel meet the just claims of Uganda for full compensation for the damage inflicted on Uganda.³⁷ In the Soviet view, individual acts of terrorism could never justify, under international law, an attack by one state against another.³⁸ The OAU resolution was never brought to a vote, but the Council also failed to adopt, for want of enough affirmative votes, a resolution that would, *inter alia*, have condemned hijacking of airplanes, called upon all states to take every necessary measure to prevent and punish all such terrorist acts, and reaffirmed the need to respect the sovereignty and territorial integrity of all states in accordance with the United Nations Charter and international law.

More recently, the Soviet Union supported the 1979 U.N. International Convention Against the Taking of Hostages.³⁹ However, its record concerning the U.S. hostages in Iran is not wholly compatible with the terms of the Convention. On the positive side, the Soviet Union voted for a U.N. Security Council resolution⁴⁰ that called for the immediate release of the hostages, and its judge on the International Court of Justice voted for a Court interim order⁴¹ and final judgment⁴² calling for release. On the negative side, the Soviet Union vetoed a Security Council resolution⁴³ that

vention for the Suppression of Unlawful Acts against the Safety of Civil Aviation (Montreal Convention), 24 U.S.T. 564; T.I.A.S. No. 7570. The Soviet Union has also taken a hard-line position regarding the extradition and punishment of aircraft hijackers. See Evans, *Aircraft and Aviations Facilities*, A.E. Evans, & J.F. Murphy, *supra*, note 9, at 3.

³⁴The Soviet Union is a party to the 1974 Convention on the Prevention and Punishment of Crimes Against Internationally Protected Persons, Including Diplomatic Agents, 28 U.S.T. 1975, T.I.A.S. No. 8532.

³⁵The Soviet Union supported adoption of the 1979 International Convention Against the Taking of Hostages, U.N. Doc. A/C 6/34/L. 23 (1979); G.A. Res. 34/146 (1979).

³⁶See Murphy, *Protected Persons and Diplomatic Facilities*, A. E. Evans & J. F. Murphy, *supra*, note 9, at 277, 291.

³⁷See U.N. Monthly Chronicle 15-21, 67-76 (Aug-Sept. 1976) for a summary of the Security Council's debate on Entebbe.

³⁸*Id.*, at 70.

³⁹See *supra*, note 35.

⁴⁰S.C. Res. 457 (1979), reproduced in 18 INT'L LEGAL MATERIALS 1641 (1979).

⁴¹Interim Order, Case Concerning United States Diplomatic and Consular Staff in Teheran, reproduced in 19 INT'L LEGAL MATERIALS 139 (1979).

⁴²Judgment, Case Concerning United States Diplomatic and Consular Staff in Teheran, reproduced in 19 INT'L LEGAL MATERIALS 553 (May 1980).

⁴³U.N. Chronicle 18 (March 1980).

would have imposed mandatory economic sanctions against Iran for its refusal to release the hostages. There is also evidence that Soviet broadcasts into Iran spoke sympathetically of the hostage taking and, at the time the final agreement regarding release of the hostages was being negotiated between the United States and Iran, alleged that the United States intended to invade Iran and cared nothing for the fate of the hostages.⁴⁴

A major difficulty in evaluating Soviet practice with respect to international terrorism is the problem of defining "state support of international terrorism." The U.S. Congress has wrestled with this problem. In draft legislation not yet enacted into law,⁴⁵ Congress has provided that state support of international terrorism consists of any of the following acts committed deliberately by the state:

- (1) Furnishing arms, explosives, or lethal substances to individuals, groups, or organizations with the likelihood that they will be used in the commission of any act of international terrorism;
- (2) Planning, directing, providing training for, or assisting in the execution of any act of international terrorism;
- (3) Providing direct financial support for the commission of any act of international terrorism;
- (4) Providing diplomatic facilities intended to aid or abet the commission of any act of international terrorism; or
- (5) Allowing the use of its territory as a sanctuary from extradition or prosecution for any act of international terrorism.⁴⁶

The scope of subparagraph 1 would appear broad enough to cover a variety of situations—most particularly it would appear to cover Soviet furnishing of arms to insurgency groups because of the likelihood that arms furnished to such groups will be used in at least a few instances to commit acts of international terrorism. The Department of State, however, has, until recently, been more cautious in its approach to state support of international terrorism. Only four countries—Libya, Syria, Iraq and South Yemen—have been identified by the Department as repeatedly providing support for acts of international terrorism.⁴⁷

VI. Conclusions and Recommendations

The record of the Soviet Union with respect to international terrorism—from the perspective of those attempting to combat it—is, to understate the

⁴⁴See World Press Review, March 1981, at 12.

⁴⁵The Omnibus Anti-terrorism Act of 1979, S. 333.

⁴⁶Section 5(b), S. 333.

⁴⁷See Enclosure 2, *Conclusions with Respect to Criteria, Alternative Means, and Furtherance of Foreign Policy or International Obligations*, with President Carter's letters of December 29, 1979, to the President of the Senate and the Speaker of the House notifying Congress of the extension of certain foreign policy controls. 123 CONG. REC. H380 (daily ed. Jan. 29, 1980) at H381. On December 31, 1980, President Carter extended the foreign policy controls with respect to states deemed to be supporting international terrorism. See BNA International Trade Reporter's U.S. Export Weekly, No. 339, Jan. 6, 1981, at A-10.

matter, far from satisfactory. The proposition that the Soviet Union is the foremost supporter of international terrorism is more questionable.

Perhaps the most one can conclude from a review of the record to date is that the Soviet Union has directly or indirectly supported acts of international terrorism when it has served its interests as it perceives them. Thus the Soviet Union has supported insurgency groups espousing communist doctrine, and members of these groups have at times engaged in terrorism. Also, the Soviet Union is committing numerous atrocities in Afghanistan and is stifling domestic dissent by means repressive enough at times to constitute state terrorism. Its "surrogates" Libya, Cuba, Iraq, Syria, South Yemen and others have trained some free-lance terrorist group members.

One should guard, however, against exaggerating the magnitude of Soviet support of international terrorism or concluding that the Soviet Union always perceives its interest to lie in supporting international terrorism. Soviet aircraft and diplomats have been subject to terrorist attack, and, with the recent increase in right-wing terrorism, one can envision more terrorist attacks against Soviet personnel and property.⁴⁸ Moreover, there have been recent instances of communist cooperation with Western democracies in combatting international terrorism. In 1978 Bulgaria went so far, reportedly with Soviet approval,⁴⁹ as to allow West German police to enter its territory, assist in the capture of four West German terrorists, and take them back to West Germany. In 1973, the United States and Cuba entered into a memorandum of understanding regarding the hijacking of aircraft and ships,⁵⁰ and have continued to cooperate in this area although the memorandum formally terminated in 1977, pursuant to Cuba's denunciation.⁵¹

One would hope that it might be possible to convince the Soviet Union that it is more often in its interest to combat than to support international terrorism. In attempting to do this, the United States should employ both the carrot and the stick.

Public disclosure of Soviet support for insurgency groups in El Salva-

⁴⁸At present the incidence of terrorist attack against the Soviet Union is low. CIA reports indicate that only about 5% of the victims of terrorism were nationals of the Soviet Union or its East European allies. *N.Y. Times*, Feb. 9, 1981, at A3, col. 4. However, the CIA has also reported that Soviets abroad continue to be attacked by militant Jewish groups and anti-communist Cuban exiles and that more recently Soviet officials and commercial facilities have been bombed by Ukrainian exiles and individuals protesting the Soviet occupation of Afghanistan. CIA National Foreign Assessment Center, *International Terrorism in 1979*, 6 (April 1980).

⁴⁹*N.Y. Times*, July 17, 1978, at A1, col. 5.

⁵⁰Cuba-United States Memorandum of Understanding on the Hijacking of Aircraft and Vessels, 68 DEPT. STATE BULL. 260 (1973); 12 INT'L LEGAL MATERIALS 370 (1973).

⁵¹The Memorandum was denounced by Cuba on the grounds that the United States had failed to control anti-Castro terrorists who had planted a bomb on a Cuban civilian aircraft. *See Washington Post*, Oct. 19, 1976 (editorial), at A18, col. 1. Nonetheless, the hijackers of U.S. planes to Cuba have continued to face the prospect of extradition to the United States or prosecution in Cuba. *N.Y. Times*, Sept. 18, 1980, at A20, col. 1.

dor⁵² and elsewhere and close scrutiny of the Soviet record regarding international terrorism may prove effective uses of the stick. At the same time, we should seek, through quiet diplomacy, possible avenues of cooperation with the Soviet Union in combatting terrorism. The carrot may become an effective tactic if the Soviet Union begins to perceive that it needs Western cooperation to minimize the risk of terrorist attack against its own personnel and property. To convince the Soviet Union that its best interest lies in resisting rather than in supporting international terrorism will require delicate and creative diplomacy. But the future stability and peace of the world may depend on the success of such an endeavor. It should be remembered that the assassination in Sarajevo of Archduke Franz Ferdinand and his wife on June 28, 1914, by Serbian terrorists escalated tensions between Serbia and Austria-Hungary, and thus between the Dual Alliance and the Triple Entente, to the level of war. Current manifestations of international terrorism have a similar war making potential.

⁵²For the text of the Department of State report on communist support for the insurrection in El Salvador, *see* N.Y. Times, Feb. 24, 1981, at A8, col. 1.