

**Statement for the Record**  
**Hearing of Senate Armed Services Committee – SD G-50**  
**Implementation of Decision to Open Ground Combat Units to Women**

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**I. INTRODUCTION AND OVERVIEW**

Thank you for the invitation to submit a statement for the record of this hearing. I am a former member of the Defense Advisory Committee on Women in the Armed Forces. (DACOWITS), and the 1992 Presidential Commission on Assignment of Women in the Armed Forces. The congressionally-established Commission spent a full year studying a wide range of issues surrounding policies regarding women in combat in 1992. In 1993, I founded the Center for Military Readiness, a non-partisan public policy organization that reports on and analyzes military/social issues.

Much has happened since 1991, 25 years ago - the last time that this Committee had a public hearing on women in combat. The House last had extensive hearings in 1979. The passage of time and advances in technology have not changed the nature and requirements of direct ground combat (DGC). A number of books about recent wars describe in brutal detail the violence and physical demands that often are faced by DGC units that seek out and attack the enemy with deliberate offensive action.<sup>1</sup>

Direct ground combat missions at the “point of the bayonet” are unlike any other job in the civilian world, including law enforcement and firefighting. These aggressive, physically grueling missions go beyond the experience of serving “In Harm’s Way” in war zones, where women have served with unquestioned courage.

Issues surrounding the involuntary assignment of women to Army and Marine Corps infantry, armor, artillery, Special Operations Forces and Navy SEALs are as critically important now as they ever have been. And yet, the topic designated for this hearing appears to be skipping over the substance of this life-and-death national security issue.

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<sup>1</sup> For example, [Outlaw Platoon: Heroes, Renegades, Infidels and the Brotherhood of War](#), by Sean Parnell, Harper Collins Publishers, 2012, and Sean Naylor, [Not a Good Day to Die – Chaos and Courage in the Mountains of Afghanistan – The Untold Story of Operation Anaconda](#), Berkley Publishing, 2005.

The administration is planning to assign significant numbers of minimally-qualified young women to small fighting units, on an involuntary basis, and to send them to fight ISIS and other vicious enemies under conditions that involve higher risks for women than for men.

This is being done even though officials are well aware that women's physical capabilities are far less than men's and their risks of injury are far greater. This is not a "pro-woman" policy; it is a cruel deception, betraying the interests of uniformed women who deserve better. It is also unfair to men – tantamount to telling Navy SEALs that they should execute HALO (high altitude, low-opening) jumps with parachutes known to fail 30% of the time.

Secretary of the Navy Ray Mabus and like-minded activists keep insisting that training standards will not be adjusted to levels that are "gender-neutral" but lower than before. This will not be possible, due to pressures from Pentagon officials who truly believe that "gender diversity is a strategic imperative."<sup>2</sup> Secretary Mabus has loudly called for gender diversity quotas of at least 25%, while simultaneously denying plans for gender diversity quotas.<sup>3</sup>

Members of this committee should be challenging contradictory claims such as this. Men and women in uniform, whose voices have been raised but not heard, are facing situations in which men in the combat arms will be less prepared for the violence of combat, and women will be targets of resentment they do not deserve.

In an official survey, 85% of Navy SEALs strongly opposed gender-integration in their physically-demanding units, with 80% saying women aren't strong enough to handle demands of the job.<sup>4</sup> It's not that Special Operators don't respect military women, it's because their exceptionally demanding missions, and deliberately arduous training, put their lives on the line every day.

An official survey of Army women found that 92.5% did not want to serve in direct ground combat units if the opportunity were offered.<sup>5</sup> Women should not have to accept double-and-higher injury rates and other career disadvantages competing with stronger men, paying a higher price than men do for volunteering to serve their country.

This Committee has invited to appear before you service secretaries who seem indifferent to the opinions of the troops they lead on this issue, and military leaders who are not in a position

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<sup>2</sup> Navy Public Affairs, ["CNO Calls Diversity a Strategic Imperative,"](#) Jun. 30, 2006.

<sup>3</sup> In May 2015 Navy Secretary Mabus announced that he wants [1 in 4 Marine recruits to be women](#), and Vice Chief of Naval Operations Adm. Michelle Howard wants to see [25% of Navy ship crews to be women](#).

<sup>4</sup> Lolita Baldor, AP, Military Times, ["U.S. Commandos Say No to Women in Special Operations Jobs,"](#) Dec. 10, 2015.

<sup>5</sup> Lolita Baldor, AP, USA Today, ["Few Army Women Want Combat Jobs, Survey Finds,"](#) Feb. 25, 2014. <http://www.usatoday.com/story/news/nation/2014/02/25/army-women-combat/5811505/>

to dissent. This is because the administration announced that it would ignore the best professional advice of the Marine Corps, which centered on paramount concerns: “*survivability and lethality.*”<sup>6</sup> Members of this committee can do better than the Executive Branch by paying close attention to the Marines’ best professional advice and the solid rationale behind it.

On December 3, 2015, Secretary of Defense Ashton Carter announced his unilateral decision to abolish women’s exemptions from direct ground combat. Two months later, you have asked for testimony on how to implement policies that have been made by the Executive Branch, not Congress.

With all due respect, this Committee should be asking whether military women should be ordered into the combat arms. Diligent oversight requires focus on “survivability and lethality” – paramount factors of concern to the Marine Corps.

This statement will address the designated topic. However, I challenge this committee to take a thorough, objective look at the substance of underlying issues that have yet to be examined:

- *Will the Executive Branch’s policies regarding women strengthen or weaken our military?*
- *Why should the Executive Branch be allowed to determine the military and legal consequences for women, men, and civilian women of Selective Service age?*
- *Will the policies in question help women or hurt them?*
- *Most importantly, will combat effectiveness be improved or degraded?*

Some would have us believe that military history ended on December 3. On the contrary, our military can and will be responsive to orders from a future Commander-in-Chief. The record of this Committee needs to be filled out to the greatest extent possible.

### ***Empirical Facts vs. Mitigation Myths***

Section II of this statement sets forth in a brief format major findings of recent research that demand attention. Particular attention should be given to the Marine Corps’ Ground Combat Element Integrated Task Force (GCEITF) field tests, which were conducted at west-coast bases for nine months, starting in 2014.

University of Pittsburgh researchers monitored individual and group performances by all-male and gender-integrated teams in tasks common to direct ground combat units such as the infantry, armor, artillery, and combat engineers. GCEITF exercises were designed to test the

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<sup>6</sup> [Memorandum for the Commandant](#), United States Marine Corps Assessment of Women in Service Assignments, Aug. 18, 2015, p. 6.

hypothesis that gender-integrated units, under gender-neutral standards, would perform equally as well as a gender-restricted unit.<sup>7</sup>

The data produced, however, disproved the hypothesis.

All-male task force teams outperformed mixed gender units in 69 percent (92 of 134) of ground combat tasks. Significant disparities in physical size, strength, endurance, injury rates, and early onset of fatigue that affected marksmanship were scrupulously recorded with scientific monitoring techniques. This research was as definitive as possible, short of an actual war.

It is beyond dispute that in gender-mixed units, physical deficiencies had negative effects on the unit's speed and effectiveness in simulated battle tasks, including marching under heavy loads, casualty evacuation, and marksmanship while fatigued.<sup>8</sup> In some task force units male volunteers compensated for the women's difficulties by taking over strenuous tasks. This "mitigation strategy" would be incompatible with mission effectiveness under wartime conditions. Men and women in uniform are counting on you to assert your policy-making authority, and to restore sound priorities that put the needs of the military, and national security, first.

### ***Circumventing Congress***

The Executive Branch is trying to sweep these findings under the rug, or dissemble about their meaning. Some have even claimed that the unilateral policy changes in question are the result of extensive research.

On the contrary, harmful policies are being unilaterally imposed by the Executive Branch *in spite of* empirical research, not because of it. Nevertheless, the Marines' highly-credible, scientific body of research work will not go away; the truth never does.

The high-handed attitude that the Executive Branch has shown in circumventing Congress on this issue ought to offend every member of this Committee.

On December 17, 2015, the Chairman and some members of the House Armed Services Committee sent to Defense Secretary Ashton Carter a letter asking for more information on policies announced on December 3. On New Year's Eve, December 31, 2015, a Defense Department official responded with two pages of equivocal, evasive answers.<sup>9</sup>

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<sup>7</sup> Col. Anne Weinberg, USMC, Deputy Director, Marine Corps Force Innovation Office, Update to the DACOWITS, 18 September 2014.

<sup>8</sup> See bar graph reproduced in Section IV of this statement.

<sup>9</sup> [Letter](#) from Acting Under Secretary of Defense for Personnel & Readiness, Dec. 31, 2015.

- For example, a question about the involuntary nature of direct ground combat assignments was couched in misleading words that avoided the word “involuntary,” even though Secretary Carter confirmed during his December 3 news conference that military women would be assigned on the same involuntary basis as men.<sup>10</sup>
- The letter also dodged a question regarding separate-gender initial training, deferring to unspecified “*final implementation plans.*” In less than 24 hours, on New Year’s Day, Secretary of the Navy Ray Mabus ordered the Marine Corps to begin the process of dismantling their separate-gender recruit training program, which is known to be superior for both male and female Marines.

Adding insult to injury, Secretary Mabus gave the Corps only fourteen days to come up with plans to do this. Mr. Mabus’ arrogant, unjustified action was an affront to Congress as well as to the Marine Corps.

This Committee, the full Senate, and your counterparts in the House have the constitutional responsibility to carefully consider the significant implications of research results produced since 2012. It is up to you, elected officials, to make policies that will affect every man and women in our military, and civilian women of Selective Service age as well.

Diligent oversight should begin by obtaining and making public the request for exceptions to women in land combat directives that the Marine Corps submitted to the Secretary of Defense in the fall of 2015. The rationale and facts supporting that request always will remain true, even if the administration chose to ignore them.

We challenge this Committee to review *every* training issue that the Executive Branch is trying to unilaterally decide – from boot camp to BUD/S, recruiting to the 75<sup>th</sup> Ranger Regiment. This process should begin with candid and objective evaluations of the unrealistic, less than credible mitigation strategies that the Defense Department, the military services, and their largely-civilian contractors are proposing to make this social experiment “work.”

The word “mitigation,” which is never coupled with words like “benefits” or “advantages,” warns of problems ahead. As with substandard equipment, substitutes for sound policies rarely serve as well. Wouldn’t it be better to avoid life- and mission-threatening problems in the first place?

Above all, the risks of being wrong should weigh heavily on your minds. Members of this committee, and the next President of the United States, should take seriously the cautionary words of Brig. Gen. George W. Smith, Jr., Director of the USMC Force Innovation Office:<sup>11</sup>

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<sup>10</sup> Defense Department Press Briefing, [Transcript](#), Dec. 3, 2015.

<sup>11</sup> [Memorandum for the Commandant](#), FN #13, *infra*, p. 14.

*“To move forward in expanding opportunities for our female service members without considering the timeless, brutal, physical and absolutely unforgiving nature of close combat is a prescription for failure. Our future enemies will be the ultimate arbiter of such decisions – when lives of our Marines are in the balance. Those who choose to turn a blind eye to those immutable realities do so at the expense of our Corps’ warfighting capability and, in turn, the security of the nation.”*

## **II. MARINES SET SOUND PRIORITIES: “SURVIVABILITY & LETHALITY” IN BATTLE**

Comprehensive research projects done by the U.S. Marine Corps since 2012 clearly show that in units where physical strength and endurance matter, physical disparities between men and women cannot be ignored in the policy-making process. For this and many other reasons, the case for women in direct ground combat has not been made.

### **A. Results of Unprecedented Research Deserve Close Examination**

For nine months in 2015, the Ground Combat Element Integrated Task (GCEITF) conducted scientifically-monitored field exercises that simulated wartime requirements for direct ground combat units such as the infantry, armor, artillery, and combat engineers. Some of the volunteer task force teams were all-male, while others included women Marines. The women met physical fitness and combat fitness test (PFT/CFT) requirements on an equal basis, and received formal MOS training in advance.<sup>12</sup>

During field exercises simulating ground combat at the Marine Corps Air Ground Combat Center, the Mountain Warfare Training Center and in the waters off of Camp Pendleton, University of Pittsburgh experts used body-monitoring and other scientific methods to gather empirical data reflecting actual experience, not theory.

On August 18, 2015, the Marine Corps Force Innovation Office (MCFIO) submitted to the Commandant of the Marine Corps a memorandum signed by Brig. Gen. George W. Smith, Jr., Director of the Marine Corps Force Innovation Office.<sup>13</sup> The 33-page memo and attached documents, including briefing slides, presented significant facts from the Marine Corps Test and Evaluation Activity (MCOTEA) report on the Task Force research.

Elements of the Task Force research project were designed to evaluate collective performance and unit standards in simulated combat tasks. As the Smith memo stated, this was done because “Marines fight as units.” (p. 3)

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<sup>12</sup> [Analysis of the Integration of Female Marines Into Ground Combat Arms and Units](#), marked “Pre-Decisional – Not Releasable under FOIA.” Hereafter, “Marine Corps Analysis.”

<sup>13</sup> The document above was covered by a [“Memorandum for the Commandant of the Marine Corps,”](#) from Brigadier General George W. Smith, Jr., Director, Marine Corps Force Innovation Office, 18 August, 2015, Subject: United States Marine Corps Assessment of Women in Service Assignments.

The following excerpts from the Smith report, and from a 4-page Summary of research results released on September 10, reconfirm results of many previous studies and reports on the subject.

### **1. *Definition of Direct Ground Combat***

There is no doubt that women served with courage and distinction in harm's way in recent wars. The missions of direct ground combat units such as the infantry, however, involve seeking out and attacking the enemy with deliberate offensive action.<sup>14</sup>

A 4-page Summary of the full body of research, released on September 10, established sound priorities: "In analyzing the results of the research and analysis, the primary consideration throughout has been to understand any impact on the combat effectiveness of Marine ground combat units. Based on the unique role the Marine Corps fulfills within the Joint Force and in the security of the nation, the benchmark of achieving the 'most combat effective' force has remained the unwavering focus." (Sept. 10 Summary, p. 2)

The Smith Memo listed a number of realities that would detract from that focus: "Female Marines demonstrated that they were capable of performing the physically demanding tasks, but not necessarily at the same level as their male counterparts in terms of performance, fatigue, workload, or cohesion." (p. 4)

- a) "The assessment across all occupational specialties revealed that gender integrated teams, squads, or crews demonstrated, with very few exceptions, degraded performance in the time to complete tasks, move under load, and achieve timely effects on target as compared to all male teams, squads, or crews." (p. 4)
- b) "[These] shortfalls . . . were magnified in like units with a higher-density gender integration." (p. 4)

### **2. *Methodology of Task Force***

Contrary to claims that less-prepared women were involved in the Task Force research over nine months, "[F]emale volunteers within the GCEITF were universally considered to be an above-average to well-above-average representation of the PFC-Sergeant female population throughout the Marine Corps. The male volunteers were considered by their unit leaders and research observers as being an average representation of their male peers..." (p. 4)

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<sup>14</sup> "Female Marines earned 422 Combat Action Ribbons in Iraq and Afghanistan." The decorations recognized their courageous service 'in harm's way' in a war zone. "However, none of those awards reflected a female Marine having to 'locate, close with and destroy the enemy' in deliberate offensive combat operations." (pp. 1-2, Smith report)

### 3. **Minimum Standards Cannot Reduce Risks**

“...[D]espite vastly improved and codified individual standards, some level of risk will remain in the infantry and special operator MOSs that I do not believe can be fully mitigated by simply applying a minimum standard.” (p. 5)

- a) “That risk is associated with the unique physical demands of service in the infantry, reconnaissance and special operations occupations that place a premium on the ability to conduct dismounted movements under load.” (p. 5)
- b) “[A] Marine infantry unit must be fully capable of regularly moving dismounted for extended distances with heavy loads. This has been the coin of the realm for Marine infantry throughout history, and the requirement for more distributed operations with less reliance on external logistics support reflected in Expeditionary Force 21 now places even greater demands on the individual infantry Marine.” (p. 5)

### 4. **Physiology Matters**

“The associated risk is directly linked to the physiological differences between males and females. Simply, size matters when executing a dismounted movement under load.” (p. 5)

- a) “The physiological differences in body fat between males and females – body fat being synonymous with ‘dead weight’ to be added to whatever external equipment load is already being carried . . . places females at a significant disadvantage from the start in infantry-related tasks.” (p. 5)
- b) “On average, females possess significantly less lean body mass, a slighter build that affects stride length and stride frequency as loads increase, less absolute V02 max production, and less power and anaerobic/aerobic capacity than males.” (p. 5)
- c) “The combination of these factors constitutes a potential risk to combat effectiveness for a force that must be self-sufficient for movement and fully capable of extended dismounted operations within the highest intensity portion of the combat spectrum.” (pp. 5-6)

### 5. **Combat Performance & Effectiveness**

“All-male task force teams outperformed their mixed-gender counterparts in 69 percent (93 of 134) ground combat tasks.” (Briefing Slide #1)

- a) “Physical differences were more pronounced in *“specialties that carried the assault load plus the additional weight of crew-served weapons and ammunition.”* (Slide #2)
- b) “All-male squads were faster than integrated squads on hikes, gorge crossings, and cliff



ascents during the assessment in different environmental settings at MWTC.” (Slide #2)

- c) “Male provisional infantry (those with no formal 03xx school training) had higher hit percentages than the 0311 (school trained) females.” (Slide #3 & Sept. 10 Summary, p. 3)
- d) “All-male infantry crew-served weapons teams engaged targets quicker and registered more hits on target as compared to gender-integrated infantry crew-served weapons teams, with the exception of M2 accuracy.” (Slide #3 & Sept. 10 Summary, p. 3)
- e) “All-male squads, teams and crews and gender-integrated squads, teams, and crews had a noticeable difference in their performance of the basic combat tasks of negotiating obstacles and evacuating casualties.” (Sept. 10 Summary, p. 3)
- f) “Depending on the unit, male GCEITF volunteers perceived that combat effectiveness declined with female Marines’ presence . . . Numerous cases of compensation were observed during physically demanding tasks, in which males shifted positions to take over certain aspects of tasks from females.” (Slide #4)

## **6. Cumulative Impact of Injuries**

“The well-documented comparative disadvantage in upper and lower-body strength resulted in higher fatigue levels of most women, which contributed to greater incidents of overuse injuries such as stress fractures.” (Sept. 10 Summary, p. 4)

- a) “These realities are clearly not insurmountable nor are they always manifested during a one-time march under load that reflects an entry-level performance standard. Rather, the risk lies in the cumulative impact of this physiological disadvantage over the course of regular, recurring and increasingly more challenging dismounted movements under load in the operating forces” (p. 6 - Note: Some media reports changed the context by putting in quotes only the first part of this sentence, “These realities are clearly not insurmountable.”)
- b) “This is exacerbated by other physiological factors that, in concert, make females much more susceptible to injuries, either caused by a specific event or through the cumulative impact of repetitive dismounted movements under load.” The disparity in injury rates between males and females at the Infantry Training Battalion (ITB) and during the conduct of the GCEITF assessment, due principally to multiple marches under load, provides an early indicator to that effect.” (p. 6)
- c) “During the GCEITF assessment, musculoskeletal injury rates were 40.5% for females, compared to 18.8% for men”. (Slide #7 & Sept. 10 Summary, p. 4)
- d) “Within the research at the Infantry Training Battalion, enlisted females undergoing that entry-level training were injured at more than six-times the rate of their male

counterparts.” (13% vs. 2%) (Slide #5 & Sept. 10 Summary, p. 4) <sup>15</sup>

## **7. U.S. Research Confirms British Findings**

“The United Kingdom review on ‘Women in Ground Close Combat’ . . . highlighted 21 factors likely to change based on the integration of women into ground combat arms specialties, 11 of which would have a negative impact; three of those 11 negative impacts . . . could not be mitigated. (p. 6)

- a) Among the three factors that would negatively impact combat effectiveness without known mitigation strategies are survivability and lethality. This conclusion is based on the analysis that “a woman who is performing to the same physical performance standards as a man will be working closer to her maximum performance standards capacity when carrying the same absolute combat load, and will fatigue sooner than her male counterpart.”(p. 6 & Slide #2)
- b) “This conclusion was reinforced in our own research during the GCEITF assessment that highlighted the disparity between males and females in relative movement rates and lethality with various individual weapons within the infantry occupations.” (p. 6 )
- c) “In particular, the overall accuracy of the female 0311 infantry volunteers declined and the disparity in accuracy relative to their male counterparts increased as the weight of the individual weapon system increased.” (p. 6 & Slide #2)

## **8. High Standards Would Produce Tokenism**

There is no reason to believe that if positions are opened, significant numbers of women will want them.

- a) “Based on individual propensity and the ability to meet minimum standards, it is difficult to project a number of female infantry Marines that does not exceed what could be viewed as tokenism.” (p. 6)
- b) “After a quarter century of integration and with unquestionably much lower physical standards than the U.S. Marine Corps, the Canadian Army has .4% female enlisted infantry.” (p. 6)

## **9. Potential Loss of Talented Women**

“[T]he Marine Corps risks losing a number of highly talented female Marines prematurely due largely to the often extreme physical demands of these infantry, reconnaissance and special

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<sup>15</sup> CMR Policy Analysis: [New British Ministry of Defence Review Paper Shreds Case for Women in Ground Close Combat](#), February 2015.

operations occupations.” (p. 7)

- a) “Service in these uniquely physically demanding occupations will place the majority of female Marines at a competitive disadvantage relative to their male peers...” (p. 7)
- b) “We need to continue to attract, develop, and retain our female Marine talent to meet future challenges across the range of military operations. The likelihood of a female Marine being less competitive in these significantly more physically demanding occupations may adversely impact the Marine Corps’ ability to retain top female talent and enable their progression into more senior ranks.” (p. 7)
- c) “Simply, any loss of this MCRC-established momentum, or worse, a downward trend in retaining our top female Marines, would be a tremendous loss for the Corps.” (p. 7)

## **B. Statements of Principle**

The 1992 Presidential Commission on the Assignment of Women in the Armed Forces conducted a thorough, year-long study of women in combat policies in all service branches. The Commission’s review was guided by over-arching principles quoted in the Smith report:

“A military unit at maximum combat effectiveness is a military unit least likely to suffer casualties. Winning in war is often only a matter of inches, and unnecessary distraction or any dilution of the combat effectiveness puts the mission and lives in jeopardy. Risking the lives of a military unit in combat to provide career opportunities or accommodate the personal desires or interests of an individual, or group of individuals, is more than bad military judgment. It is morally wrong.” (p. 13)

Brig. Gen. Smith added a passage from the Marine Corps Warfighting Doctrinal Publication *Warfighting*:

“Of all the consistent patterns we can discern in war, there are two concepts of universal significance in generating combat power: speed and focus. Speed is rapidity of action. It applies to both time and space. Speed over time is tempo – the consistent ability to operate quickly. Speed over distance, or space, is the ability to move rapidly. Both forms are genuine sources of combat power. In other words, *“speed is a weapon.”* (p. 13)

The Smith report also quoted from the Presidential Commission report a “fundamental tenet that is as relevant today as it was nearly a quarter century ago.”

“Service members are encouraged to pursue opportunities and career enhancements in the Armed Forces, limited only by the needs and good of the Service. But when it comes to combat assignments, the needs of the military must take precedence over all other considerations, including the career prospects of individual service members.” (p. 13)

“With this primary consideration, the Marine Corps has analyzed factors such as speed and tempo, lethality, readiness, survivability, and cohesion — critical components to fighting and winning in direct ground combat.” (Sept. 10 Summary, p. 2)

### **C: USMC Training and Education Command (TECOM) “Proxy” Tests**

Secretary of the Navy Ray Mabus criticized the Marine Corps GCEITF tests because they drew conclusions from averages scored during task force group exercises.

The criticism is unwarranted, since statistical averages and percentages are derived from the scores of multiple research participants. Conclusions should not be drawn based on the best or worst performances alone.

Secretary Mabus also seems unaware that tests of individual volunteers in “proxy” tests revealed the same disparities in physical strength that were evident in scientifically-measured task force results.

In 2013, the USMC Training and Education Command (TECOM) collected data from 409 male and 379 female volunteers performing five "proxy" tests simulating ground combat element (GCE) tasks. These tests confirmed that gender-related disparities are most significant in events measuring upper-body strength and endurance.<sup>16</sup>

TECOM research, among other things, reported the following findings:

- In a Pull-up test of upper-body strength used in the PFT, women averaged 3.59 pull-ups, compared to 15.69 for the men – more than four times as many.
- The Clean & Press event involves single lifts of progressively heavier weights from the ground to above the head (70, 80, 95, 115 lbs.), plus 6 reps with a 65 lb. weight. In this event 80% of the men passed the 115 lb. test, but only 8.7% of the women passed.
- In the 120 mm Tank Loading Simulation, a gunnery skills test, participants were asked to lift a simulated round weighing 55 lb., 5 times, in 35 seconds or less. Quoting the report, "*Less than 1% of men . . . [compared to] 18.68% of the women . . . could not complete the tank loading drill in the allotted time.*" The report added, "It would be very likely that failure rates would increase in a more confined space [such as a tank]."
- In the 155 mm Artillery Lift-and-Carry, a test simulating ordnance stowing, volunteers had to pick up a 95 lb. artillery round and carry it 50 meters in under 2 minutes. Noted

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<sup>16</sup> [Naval Health Research Center \(NHRC\) Analysis in Support of the Women in Service Restrictions Review Study, 2013, analyzed in the Interim CMR Special Report, Sept. 2014, U.S. Marine Corps Research Findings: Where Is the Case for Co-Ed Ground Combat?](#)

the report, "Less than 1% of men, compared to 28.2% of women, could not complete the 155 mm artillery round lift-and-carry in the allotted time." If trainees had to "shoulder the round and/or carry multiple rounds, the 28.2% failure rate would increase."

- On the Obstacle Course Wall-with-Assist-Box test, a 20" high box, (used to simulate a helping-hand) essentially reduced the height of the 7 ft. wall to approximately 5'4." Quoting the report, "Less than 1.2 % of the men could not get over the obstacle course wall using an assist box, while wearing [protective equipment] . . . [compared to] 21.32% of women who could not get over the obstacle course wall . . ."

### III. EMPIRICAL RESEARCH VS. MITIGATION MYTHS

On October 2, 2016, Secretary of Defense Ashton Carter promised, "*My ultimate decision regarding any exception to policy request will be based on the analytic underpinnings and the data supporting them.*" Secretary Carter did not honor that promise.

Two months later, looking uneasy during his December 3 news conference, Secretary Carter arbitrarily brushed aside the Marine Corps' request for exceptions to across-the-board mandates, doing so without any rationale or justification. Secretary Carter dodged a reporter's question about the three-year research being "flawed." Clearly, the biggest "flaw" in the USMC research, done with experts from the University of Pittsburgh, was its failure to support pre-determined conclusions of the Executive Branch.

Advocates of women in combat have tried to discredit the research findings by raising smokescreen arguments. Navy Secretary Ray Mabus, for example, criticized the Ground Combat Element Integration Task Force (GCEITF) research methodology because test results reported numerical averages and percentages, instead of individual performances. "*The Marines have never been about being average,*" Mabus said.<sup>17</sup>

Either the play on the word "average" was pure sophistry, or Secretary Mabus seriously misunderstands statistical analyses that University of Pittsburgh experts used in scientifically measuring individual male and female task force performances. Data points that determine statistical averages and percentages are derived from the scores of multiple research participants. Conclusions should not be drawn based on the best or worst performances alone.

Instead of assigning higher priority to the needs of the military, both Secretary Carter and Secretary Mabus have put their faith in questionable "mitigation" strategies that do not hold up under close scrutiny.

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<sup>17</sup> Ray Mabus, *Washington Post*, "[U.S. Navy Secretary: "Women Should Be Among the Few, The Proud,"](#)" and Hope Hodge Seck, *Marine Corps Times*, "[Mabus: I'm Not Asking for Women-in-Combat Exceptions,](#)" Sept. 14, 2015.

Mr. Mabus seems incapable of foreseeing the consequences of replacing sound policies with inferior substitutes that cannot prevent catastrophic failures at the worst possible time – in direct ground combat. For this reason and many others, the case for repealing women’s exemptions from direct ground units such as the infantry still has not been made.

### ***Sociology, Statistics, or Superiority in Battle?***

The Defense Department and military services invited a number of outside public policy contractors and academic consultants to participate in the Women in Service Restriction Review (WISRR) process. Some of the resulting reports or sections include inconsistent passages and unworkable ideas for “fixing” problems that, in truth, cannot be fixed.

The Department of the Army conducted limited physical tests and largely-sociological research to identify “barriers” to gender-integration in combat arms units.<sup>18</sup> The U.S. Special Operations Command (USSOCOM), subcontracted most of its work to RAND, which produced a voluminous but superficial report that primarily analyzed surveys and focus groups.<sup>19</sup>

Findings resulting from these research projects were skewed even more because Army officials and the Secretary of the Navy predetermined the results by capitulating on the key question: *Should women be assigned to Army and Marine infantry battalions, armor, artillery, and Special Operations Forces, including Navy SEALs?*

It is necessary to carefully scrutinize mitigation myths and reports that are replete with cautionary signs of life-threatening problems, papered over with social science speculations.

### ***Reality vs. Speculation***

Mitigation strategies advocated by RAND and other mostly-civilian contractors involved in WISRR projects frequently rely on academic theories, best-case scenarios, overly-optimistic behavioral expectations, and wishful thinking dressed up with statistical jargon, color-coded graphs, and tables signifying next-to-nothing.

These contractors and consultants rarely seek, report, or draw conclusions from the experiences of ground combat veterans. Instead, their recommendations reflect the opinions of the reports’ mostly-civilian authors -- academics, sociologists, behavioral scientists, economists, political scientists, and women’s studies experts – many of whom authored the mitigation strategy reports.

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<sup>18</sup> Interview with TRADOC Commander General Robert Cone, American Forces News Service, April, 2013, quoted in CMR: [Seven Reasons Why Women-in-Combat Diversity Will Lower Tough Training Standards](#)

<sup>19</sup> [Memo from USOCOM Commander Adm. William H. McRaven](#), 22 March 2013, and the resulting RAND Report for USSOCOM: [Considerations for Integration Women Into Closed Occupations in the U.S. Special Operations Forces](#)

Members of this Committee should recognize the difference between empirical data and theoretical conjectures that are contradicted by actual experience. Defining insanity, the same socially liberal consultants whose recommendations have encouraged unresolved turmoil in the military for years keep promoting the same social science remedies over and over again, expecting different results.<sup>20</sup>

With the assistance of respected advisors who have years of experience in land combat and related fields of study, CMR has analyzed mitigation proposals that purport to solve problems caused by policies that the same contractors promoted in the past.

The following topics represent only some of the major flaws in misguided proposals to mitigate problems that will occur in gender-mixed direct ground combat units. Typical mitigation proposals are listed below, followed by responses that the Committee should consider.

#### A. Training and “Gender-Neutral” Standards

1. ***With Better Training, Women Will Become As Strong as Men.*** “Bottom line, iron-deficient anemic female soldiers, when treated with supplements, run 1-2 minutes faster on a 2 mile run.” The Army’s surgeon general . . . asserts that the military ‘implement multivitamin with iron program for females during intense training.’ ”<sup>21</sup>

**Response:** Weight training and iron supplements usually strengthens individuals, but there is no evidence to support the theory that significant numbers of average-sized women can be trained to meet minimal physical capabilities of average-sized men.

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<sup>20</sup> Several times since the early 1990s RAND has produced papers advocating for women in combat and other liberal military/social policies. In 1997, RAND removed negative information from their own report on women in combat. See [CMR Analyzes 1997 RAND Study](#), Oct. – Nov. 1997. RAND also ignored a congressional mandate in the National Defense Authorization Act (NDAA) for 2006 to produce a report on *de facto* repeal of the 1994 Department of Defense collocation rule. RAND produced what CMR called the [Rubber Stamp RAND Report](#) 17 months (and two congressional cycles) beyond the legal deadline.

<sup>21</sup> LTG Patricia Horoho, Surgeon General & Commanding General, USA Medical Command, Soldier 2020, Injury Rates/Attrition Rates Working Group, 24 June 2015. Quoted by R. Emmett Tyrrell, Jr., *American Spectator*, [“Women Warriors and the Bottle -- What Will It Really Take to Make Female Soldiers Combat Ready?”](#), Dec. 23, 2015. In his satirical article, Tyrrell added, “What about steroids? Steroid injections have been found to make those who use them stronger and possessed of greater endurance. Our female recruits might grow mustaches and beards, but that would only make them look for menacing to the enemy. For that matter, why not give the female soldiers testosterone injections? . . . I suggest the Pentagon seek the advice of Lance Armstrong, the celebrated bicyclist and winner of numerous Tours de France.”

- a) According to Dr. Hugh Scott, a retired rear admiral and expert in military physiology, “Because average men have ten times more androgenic hormones than women, giving the same extra training to men would make them even stronger.”<sup>22</sup>
- b) “Weight-bearing exercise is important for healthy bone development, but excessive exercise can have the opposite effect by lowering estrogen levels, which in turn triggers bone loss. This is a contributing factor in the mechanism for stress fractures in females. The use of progestin-containing birth control pills by prospective female candidates for the infantry also can cause a calcium loss from bones – a condition that, in turn, contributes to higher injury rates.”<sup>23</sup>
- c) The Marine Corps Analysis report noted, “Historically, the non-deployability rate for female Marines is significantly higher than male Marines (up to 4 times higher) . . . predominantly due to medical reasons.”<sup>24</sup> There is no reason to believe that female physiology will change for female soldiers and Marines.
- d) In GCEITF units, female injury rates were twice as high; six times higher in the Infantry Training Battalion (ITB) for enlisted infantry training.
- e) The U. S. Army Medical Command compared male/female injury rates in formerly all-male units such as field and air defense artillery, and found that female soldiers suffered injuries averaging *double* men’s rates in specific MOSs. In the Field Artillery Surveyor Meteorological Crewmember MOS, for example, injuries for women were approximately 112% higher than men’s. In the Bradley fighting vehicle system maintainer MOS, the rate was 133% higher.<sup>25</sup>

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<sup>22</sup> Letter from Rear Adm. Hugh P. Scott, MC, USN (Ret.), to House Armed Services Committee Chairman Howard P. “Buck” McKeon, June 22, 2012. Excerpt: “While men and women have an equal number of muscles and muscle fibers, the strength difference relates exclusively to muscle size that is determined by testosterone levels. Because women have less testosterone than men, they have smaller muscle fibers that result in the development of small-size muscles; in effect, women have less muscle to activate. That also is the reason why women develop less muscle when training with weights and exercising.”

<sup>23</sup> Rear Adm. Hugh P. Scott, MC, USN (Ret.), commenting via email to CMR on December 23, 2015: “Iron is a critical element for the development of hemoglobin in the red blood cells, which carries the oxygen to all of the organs and tissues of the body. But, for strong bones and muscle strength, women also need calcium and vitamin D. Approximately 75% of American women do not obtain the recommended amount of calcium in their diet to help maintain healthy bone structure. This is a no win situation – try as they may, the powers cannot change unalterable innate bio-physiological mechanisms of the female soldiers, by having them take mineral iron.”

<sup>24</sup> Marine Corps Analysis, FN#12, *supra*, pp. 21-22.

<sup>25</sup> U.S. Army Medical Command, [Appendix A](#), quoted in CMR Policy Analysis: [Co-Ed Combat Tests Hazardous to Women’s Health](#), August 2015.



- f) More than 30 years of studies and reports in the United Kingdom and the United States have found no empirical evidence that women’s comparative strength disadvantages can be diminished over time. <sup>26</sup> The list compiled by CMR includes links to a major study done by the U.S. Army Research Institute of Environmental Medicine at Natick, MA, which did not meet expectations that with special training, women could become as strong as men.
- g) The British Ministry of Defence confirmed in a December 2014 report that even the most athletic women experience double-and-higher rates of injury and fatigue that affect speed, ability to march under load, and combat marksmanship. <sup>27</sup>

**2. Better Screening Will Improve Graduation Rates.** “While we have seen FLC [formal learning center] graduation rates that range from comparable to considerably lower for females . . . by better screening [of] students before entry, we can substantially improve female graduation rates.” <sup>28</sup>

**Response:** The next sentence in this report continues: “The downside of such screening is that we would drastically reduce the number of females eligible for these [FLC] schools. . . We would also slightly reduce the number of males eligible.”

- a) These statements summarize a 21-page section of the USMC Force Integration Plan, which apparently was prepared by a consultant or contractor who used complex formulas to suggest ways to increase female graduation rates from military occupation specialty (MOS) schools. The mitigation plan is based on questionable data correlations, speculations, and misplaced priorities.
- b) For example, the suggested plan for boosting women’s MOS formal school graduation rates is based on an analysis of known performance scores and graduation rates of volunteer men and women in several Infantry Training Battalion (ITB) experiments in 2013-2014. Under the questionable presumption that performance scores would be similar among non-volunteers in the future, the plan would use basic physical fitness and combat fitness tests (PFT/CFT) to screen potential candidates for the combat arms MOS schools.

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<sup>26</sup> Interim CMR Special Report, Part I, [Partial List of Studies and Reports Relevant to Research on Women in Direct Ground Combat](#).

<sup>27</sup> CMR Policy Analysis: New British Report Shreds Case for Women in Ground Close Combat (GCC), FN #15, *supra*.

<sup>28</sup> Marine Corps Analysis, FN #12, *supra*, pp. 47-68.

- c) PFT and CFT exercises, which are gender-normed and different for men and women, measure and help to maintain physical fitness; they were never intended to evaluate or prepare individuals for direct ground combat assignments.
- d) Officials would impose gender-neutral standards, such as six pull-ups instead of the current minimum three, thereby excluding many women and some men who could not meet that mark. These recruits would be “removed” from the group sent to formal learning centers for combat arms MOSs.
- e) By deliberately shrinking the pool of potential applicants to individuals most likely to succeed, such a system, in theory, would increase graduation rates, reduce injuries, and minimize T2P2 personnel losses (transients, transfers, prisoners, and patients). The plan also is supposed to reduce expensive retraining and transfer costs when heavy MOS assignments do not work out.<sup>29</sup>
- f) The plan is problematic for several reasons, starting with misplaced priorities.
  - In tough ground combat MOS training for infantry officers, Special Operations Forces and Navy SEALs, high failure rates are built into the program. Rigorous training excludes the majority of aspirants while finding and preparing the few remaining who really do have what it takes to be a Special Operator under extreme land combat conditions.
  - The primary goal should be excellence and combat superiority, not gender diversity. Gender-neutral standards based on *minimal* fitness tests would leave men less prepared for combat, while setting up women for disproportionate injuries and undeserved resentment.
  - According to Dr. William Gregor, an expert in military physiology, screening programs based on gender-neutral PFT/CFT scores could cause the services to lose hundreds of potential graduates by excluding large numbers of men who very likely would have graduated.<sup>30</sup> The proposed screening plan also would exclude great numbers of female prospects who want to serve their country and otherwise would become fine Marines.

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<sup>29</sup> Army documents obtained under the Freedom of Information Act indicate that the estimated re-assignment cost for each individual would be \$30,697 per soldier, with an additional \$17,606 being lost for individuals leaving the Army, not counting higher recruiting costs for women. See CMR Policy Analysis, [Co-Ed Combat Tests Hazardous to Women’s Health](#), Aug. 2015.

<sup>30</sup> Prof. William J. Gregor is a Professor of Social Sciences, School of Advanced Military Studies at the U.S. Army Command and General College, Fort Leavenworth, KS. In an October 22 email on file with CMR, Dr. Gregor explained how the losses might occur. “To understand the effect of screening you need to keep track of the changes in populations; i.e., how many are screened out and how many graduates are screened out. Table 4-4 through 4-7 will serve as an example. In Table 4-4: women 124 grads/359 started. If I require all women and men to do 6 pull-ups, Table 4-5 tells me that only 184 women start and 70 graduate. Thus, requiring 6 pull ups means 175 women are not permitted to start (359-184) and I lose 54 women graduates, 30% of women excluded would have graduated. However, requiring 6 pull ups for men means only 1620 start but I only exclude 19 from starting

- In a 2013 test, female Marine Corps boot camp recruits were required to perform three pull-ups, the male minimum. The mandate was suspended indefinitely because 55 percent of the female trainees could not do the three pull-ups. (Flexed-arm hangs are permitted instead.)
- In addition to these pre-emptive losses, talented female Marines would be more likely to leave early due to what Brig. Gen. George Smith described as the “often extreme physical demands of infantry, reconnaissance, and special operations occupations.” This would be, said Gen. Smith, “a tremendous loss for the Corps.”<sup>31</sup>

**3. *The Public Would Support Restrictive Selection Processes.*** Virtually every advocate of women in the combat arms insists that standards should not and will not change.

**Response:** Based on the fate of previous recruit screening plans, such a proposal would not survive criticism from recruiters and Pentagon feminists attacking “barriers” to women’s careers. Even if adopted, the proposed screening plans probably would meet the same opposition as the Military Entrance Physical Strength Capacity Test (MEPSCAT) — a detailed plan to match individual capabilities to MOS assignments that the Army proposed in 1982.

- Initially, the Defense Advisory Committee on Women in the Services (DACOWITS) supported the MEPSCAT, but later opposed it for being a “barrier” to women’s careers. As a result, the plan was never implemented as planned.<sup>32</sup>
- A perfect pullup PFT score is 20 for men, 8 for women. If requirements for men are made gender-neutral, there would be no incentive for men to do 20 pull-ups or more. Over time men will emerge less strong and less prepared for the violence of direct ground combat.
- Many studies in the U.S. and Britain have shown that men are more likely to sustain strength, endurance, and deployability during a full military career.<sup>33</sup> Replacing

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(1639-1620) and I lose 18 male graduates; 95% of the excluded males would have graduated. In other words, applying this screening criteria to men is unwise because it only screens out men who actually will succeed. Applied to women this screening criteria avoids training 121 women who will not graduate at the cost of 54 women who would; a potentially reasonable trade-off. The criteria is not gender neutral because it does not identify men who would fail and, thus, is unwise.”

<sup>31</sup> [Statement of Brig. Gen. George Smith, Jr.](#), Director Marine Corps Force Innovation Office, FN #13, *supra*, p. 7.

<sup>32</sup> Brian Mitchell, [Women in the Military: Flirting with Disaster](#), 1998, p. 109. Also see paper by William J. Gregor, FN #34 *infra*, pp. 5-6. MEPSCAT was recommended as part of the 1982 Women in the Army Policy Review.

<sup>33</sup> Interim CMR Special Report, Part I, Partial List of Studies and Reports Relevant to Research on Women in Direct Ground Combat, FN #26, *supra*.

otherwise qualified men with women who meet minimal PFT/CFT requirements would exclude men who have a greater potential for training up to standard in MOS schools, and for staying in the military for a full career. <sup>34</sup>

- d) Recruiters who work hard to find qualified, willing recruits are sure to oppose an arbitrary plan to screen out significant numbers of male and female prospects, in exchange for a few female trainees who might, in theory, succeed in previously all-male direct ground combat MOSs.

These negative impacts on recruiting and retention, which are essential for maintaining the All-Volunteer Force, cannot be justified.

**4. According to RAND calculations, significant numbers of women will seek infantry training and succeed in that MOS.**

**Response:** RAND's estimates of female success in boot camp are unrealistically high, and costs would rob resources from training for Marines in general. <sup>35</sup>

- a) The RAND report done for the Marine Corps, released immediately after the announcement of Secretary Carter on December 3, reflects unrealistically high estimates of female propensity to serve in the infantry. The report "assumes," for example, that 85% of women who complete boot camp and enter infantry training will complete the course, and continuation rates after the first year will be 75%. (p. 112)
- b) The RAND report also glides over additional costs for extra strength conditioning for female recruits in boot camp. It mentions in passing that female recruits would have six months of boot camp and infantry training followed by six months of informal training and about 34 "productive" month in the infantry. Projected scenarios are unlikely, but if they do prove accurate, costs would be disproportionately high for each female involved. (p. 118)

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<sup>34</sup> William J. Gregor, PhD, Professor of Social Sciences, School of Advanced Military Studies Fort Leavenworth, KS, [Why Can't Anything Be Done? Measuring Physical Readiness of Women for Military Occupations](#), a paper on physiology presented at the 2011 International Biennial Conference of the Inter-University Seminar on Armed Forces and Society. Excerpt: "The data clearly reveals a very large gap between the physical strength, aerobic capacity and size of Army men and women. Training men and women correctly improves the performance of both groups but it also widens the gap in performance."

<sup>35</sup> RAND Report: [Implications of Integrating Women into the Marine Corps Infantry](#), Dec. 3, 2015, pp. 112-120.

- c) These cost/benefit estimates are overly optimistic on women’s propensity to join or stay in the infantry. They also show no consideration for budget realities and the need to use limited funds for more productive goals.<sup>36</sup>
- d) Training investment losses due to disproportionate injuries that would end or shorten women’s careers in the infantry are not factored in, except in the non-specific discussion of personnel overages that would be required to make up for losses. As the report states, “[O]ur model predicts that there will be fewer people in the infantry than had the infantry remained closed to women. Therefore, keeping the infantry at the same size (in terms of productive time) will require additional Marines.” (p. 118)
- e) Costs for implementation of this “mitigation” measure are left to the imagination. Nor does this section of the report mention costs for ensuring “success” for female officers in Officer Candidate School (OCS), the Basic School (TBS), or the Infantry Officer Course (IOC.) Intangible costs in terms of morale and combat effectiveness would be even higher – perhaps beyond calculation.

**B. Mission Accomplishment in Direct Ground Combat**

- 5. ***Small numbers of women in the combat arms won’t affect readiness much.*** “[T]he number of females entering these combat arms MOSs and units likely will be a very small percentage – significantly lower than the current 7% female Marine Corps population overall. Thus, the overall impact on unit readiness will be buffered by the dominant numbers of male Marines, and should not show a significant difference.”<sup>37</sup>

**Response:** This comment disregards administration pressures to achieve gender diversity quotas of 25% or more. To achieve what Army Gen. Martin Dempsey called a “critical mass,” standards will be “validated” at levels that are “gender-neutral” but lower than before.

- a) At a January 2013 Pentagon briefing, then-Joint Chiefs Chairman Gen. Martin Dempsey called for a “critical mass” or “significant cadre” of women in the combat arms. Gen. Dempsey added that if “a particular standard is so high that a woman couldn’t make it, the burden is now on the service to come back and explain ... why is it that high? Does it really have to be that high?”
- b) Over time in actual practice, this would become known as the “Dempsey Rule,” meaning that a standard too high for women will be deemed too high. These changes would affect not just a few people, but the entire culture of the military. In a single

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<sup>36</sup> Hope Hodge Seck, Military.com: [Opening Marine Infantry Jobs Would Raise Recruiting Costs: RAND](#), Dec. 8, 2015.

<sup>37</sup> Marine Corps Analysis, FN #12, supra, .Summary & Conclusions p. vii.

generation, gender-neutral minimum standards could replace high, maximum standards of excellence needed to achieve combat superiority and lethality in battle.

- c) RAND Corporation recommended that since there is not much literature on what the right “critical mass” for women should be in combat units, “[T]he Marine Corps should consider experimenting with various gender mixes for infantry units of varying sizes to determine whether there are optimal gender proportions in different-sized units. However, even if the Marine Corps determines a specific critical mass policy, there may be cases in which women in solo status cannot be avoided. In such cases, additional mentoring mechanisms should be put in place.”<sup>38</sup>
- d) This statement confirms that minimally-qualified women ordered into formerly all-male DGC units will be involuntary subjects of a social experiment in which their health and lives will be put at greater risk than men.

**6. *Combat arms leaders should balance risks against the benefits of gender integration.*** “This decision will clearly be influenced by the levels of risk described, and the ability to mitigate those risks, balanced against the beneficial aspects of integration.”<sup>39</sup>

**Response:** There are no “beneficial aspects of integration” that would justify elevated risks in direct ground combat operations. Gender-related deficiencies in tasks such as casualty evacuation, surmounting rough terrain obstacles, speed while carrying heavy loads, and marksmanship accuracy while fatigued would endanger lives, missions, and ultimately national security.

- a) The Marine Corps Assessment noted that for measured tasks in the GCE-ITF field tests, “[I]ntegrated teams typically performed significantly (statistically) worse than all-male teams, especially within the infantry MOSs and the casualty evacuation (CASEVAC) tasks.” The report also provided detailed evidence, related to each MOS, in support of this statement: “Females have less strength than males in both upper and lower body, leading to lower levels of performance on physically demanding tasks.”<sup>40</sup>
- b) Subsequent pages of the report provided brief summaries of detailed data presented in the GCEITF Experimental Assessment Report produced by the Marine Corps

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<sup>38</sup> RAND: [Implications of Integrating Women into the Marine Corps Infantry](#), Executive Summary, p. xv.

<sup>39</sup> Marine Corps Analysis, FN #12, *supra*, Summary & Conclusions, p. viii.

<sup>40</sup> *Ibid*, p. 13.

Occupational Test and Evaluation Activity <sup>41</sup> (See MCOTEA graph reproduced as Section IV in this report.)

- c) In addition to infantry and CASEVAC performance differences, MCOTEA data highlighted physical strength differences, target accuracy with weapons, ability to negotiate obstacles, and occupational-related injuries. In comparison to men, female participants were found to have 40% of upper body strength and 60% of lower body strength.
- d) In addition, the report listed factors affecting survivability, lethality, and mission accomplishment, such as handgrip strength, marching speed under load, VO2 capacity (measuring endurance,) muscle mass, and body size.

In all of these factors, women clearly are disadvantaged. Increasing their numbers, therefore, would elevate risks for all personnel and combat missions. The Marines and other services should not be forced to “tolerate” levels of risk such as this.

**7. Gender-mixed units performed better in some tasks.** During task force personnel evacuation (CASEVAC) testing, “the 0341s (mortarmen) showed no differences in evacuation times . . . There was no significant difference between the integrated 0341 squad and the all-male 0341 squad with respect to emplacement and displacement times.” In addition, “During the destruction of captured munitions, integrated combat engineer squads showed no significant differences in times for loading, digging, unloading, or rigging for detonation.” <sup>42</sup>

**Response:** Such results often occurred because men did the heavy work. In 16 of 18 casualty evacuation tests, for example, men in gender-integrated groups performed single-man fireman’s carries. Other men moved more quickly to lift heavy artillery rounds. These reported “male compensations” masked female deficiencies that could cost lives in battle.

- a) The Assessment explained how “male compensation enabled integrated teams to compete at the same level as their all-male counterparts.” In squads with one or more women, male Marines almost always did the heaviest work.
- b) For example, during CASEVAC testing, “the 0341s [mortarmen] primarily used a single-Marine fireman’s carry to move the casualty; in 16 of 18 trials, a male Marine did this . . . The top one-third of the 0331 [machine gunner] results of the low-density [few women] squads was almost exclusively male fireman’s carry results.”

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<sup>41</sup> Ground Combat Element Integrated Task Force Experimental Assessment Report, Marine Corps Operational Test and Evaluation Activity, K.M. Moore, Col., USMC, Director (MCOTEA), Approved August 14, 2015, marked Pre-Decisional – Not Releasable Under FOIA.

<sup>42</sup> All references in this section are from the Marine Analysis, FN #12, *supra*, pp. 16-17.

- c) With regard to 0341 [mortarman] squads, a “masking effect that occurred within the emplacement portion is not captured by the current results. It was observed that when slower members of the squad fell back during the initial movement, their delay was hidden by the fact that the rest of the team began emplacing the 81-mm mortar system concurrently. By the time the weapon system was fire capable, all members had arrived at the mortar firing position.”
- d) In the most demanding portion of the combat engineer testing, “male engineers were responsible for picking up, moving, and lifting 155 mm artillery rounds onto a 7-ton truck, whereas females would position themselves on the truck and only be responsible for receiving the round and preparing it for onward movement.”
- e) The Assessment also noted that when researchers compared integrated 0311 [rifleman] squads to all-male 0311 squads, there were no significant differences in times, but there was an issue with getting assault packs over the wall. “Prior to negotiating the wall, 0311 Marines removed their assault packs and individually threw them on top of the 8-foot wall prior to climbing. Females in integrated squads were often noted as requiring assistance from male squad members in order to get their packs onto the wall.”
- f) Gender-integrated teams showed levels of achievement comparable to all-male units in some exercises, under controlled, limited conditions. As stated above, however, “male compensations” to make up for female strength deficiencies were needed to accomplish common heavy MOS tasks.

It would be unwise to rely upon “male compensations” under battlefield conditions – particularly in battles where there are no extra personnel to replace casualties.

- 8. Gender Integration, Injuries, & Deployability Rates:** “Research conducted by Allied nations indicates that female Marines will be at great risk of overuse injury, but this risk can be mitigated with proper training.”<sup>43</sup>

**Response:** The same paragraph notes, “Historically, female Marines become non-deployable at approximately three to four times the rate of male Marines.” There is no evidence to support assurances about proper training substantially mitigating risks of debilitating injury.

- a) The paragraph refers to efforts by the Israeli Defense Forces (IDF) to reduce overuse injuries. The report added, “However, due to differences in operating environments, force composition, public law, and employment patterns, it appears these techniques would be unsuitable for the Marine Corps.” (p. 21)

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<sup>43</sup> Marine Corps Analysis, FN #17, *supra*, p. 21.



- b) Furthermore, “[S]ome aspects of the IDF policy equate to gender-normed standards. For example, based on their load carriage index (LCI) for tactical movements, female IDF personnel are limited to 33% of their body weight, while males are limited to 60% of their body weight. Such standards violate the gender-neutrality requirement established by the SecDef, and the law prescribed in the NDAA 2014 mandate.” (p. 25)
- c) “During the GCEITF, there were significantly higher injury rates for hiking MOSs . . . compared to riding MOSs.” (p. 21) “In the U-Pitt data set, the injury rate for Hiking MOSs is 45.3% (63/139); the injury rate for Vehicle MOSs is 11.1% (6/54). (p. 23)
- d) Over a four year period (FY08-12), female Marines became medically non-deployable (MND) at rates four times greater than men’s. (20.2% - 5.4%) (p. 21) Disproportionate rates of MND losses among women likely would increase even more in the physically demanding combat arms. Personnel losses would be far more disruptive to others in small teams, such as infantry squads and tank crews, than they would be in larger combat support groups.

9. ***Some gender-mixed groups were better at problem solving.*** “During the MSU research, all-male [task force] teams performed better at tasks requiring low-levels of problem solving skills; however, integrated teams with one female perform as well or better at tasks requiring a high degree of problem solving.”

**Response:** The Assessment continued: “Of note, these live tests were completed with non-fatigued Marines; i.e., Marines were not required to conduct any physically demanding tasks prior to performing the live testing. Therefore, the impact of fatigue was not a factor in this assessment.” (p. 17) <sup>44</sup>

- a) Fatigue matters. According to the December 2014 report of the British Ministry of Defence, “Survivability in combat is, in part, predicated by physiology . . . There will be some women, amongst the physical elite, who will achieve the entry tests for GCC roles. But these women will be more susceptible to acute short term injury than men . . . [W]omen have a twofold higher risk of musculoskeletal (MSK) injury.” <sup>45</sup>
- b) The British Ministry of Defense report also found that even “physically elite” women were more susceptible to injuries and early onset of fatigue that affected marksmanship. These factors increased with heavier loads, resulting in a “distinct cohort with lower survivability in combat.”

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<sup>44</sup> Analysis of the Integration of Female Marines into Ground Combat Element Arms and Units, FN #17, *supra*, p. 17.

<sup>45</sup> CMR Policy Analysis: [New British Report Shreds Case for Women in Ground Close Combat \(GCC\)](#), p. 3.

- c) In addition, “Similar research points to a reduced lethality rate; in that combat marksmanship degrades as a result of fatigue when the combat load increases in proportion to body weight and strength.”

Claims that women’s undefined “problem-solving” capability would be a suitable trade-off for the physical realities described above are not credible – especially when higher rates of injury and non-deployability due to other medical reasons are factored in.

### C. Cohesion & Discipline

- 10. ***Training and leadership can mitigate harmful effects on unit cohesion.*** “[A]ny initial detrimental effects on cohesion can eventually be mitigated with good training and solid leadership.”<sup>46</sup>

**Response:** Military cohesion is not about liking others or working on tasks. Experts who testified before the 1992 Presidential Commission on the Assignment of Women in the Armed Forces explained that military cohesion is properly defined as mutual trust for *survival* and mission accomplishment in battle.<sup>47</sup>

Horizontal cohesion exists between members of a combat team. Vertical cohesion is properly defined as mutual trust between the Commander-in-Chief, officials in the chain of command, and subordinate troops that they lead. Policies that disregard physical differences would severely degrade both horizontal (unit) and vertical (leadership) cohesion.

Superior strength and endurance are directly related to mutual trust for survival in battle, on which unit cohesion is based.

- a) University of Pittsburgh data showed that all-male task force units outperformed gender-mixed ones in 69 percent (93 of 134) ground combat tasks, particularly in “specialties that carried the assault load plus the additional weight of crew-served weapons and ammunition.”
- b) In addition, “All-male squads, teams and crews and gender-integrated squads, teams, and crews had a noticeable difference in their performance of the basic combat tasks of negotiating obstacles and evacuating casualties.”<sup>48</sup>

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<sup>46</sup> Marine Corps Analysis, FN #12, *supra*, (Summary & Conclusions, p. iv)

<sup>47</sup> Report of the Presidential Commission on the Assignment of Women in the Armed Forces, November 15, 1992, CF 2.5.1, p. C-81.

<sup>48</sup> See CMR Interim Report Part II, Section A, FN #26 *supra*, for specific references. The MCOTEA report provides detailed comparisons of the performances of all-male and gender-integrated units.

- c) Gender diversity mandates that disregard obvious physical differences between men and women would be demoralizing as well as dangerous. Subordinates at all levels will witness their leaders assigning highest priority to “gender diversity” goals even at the expense of high standards, survivability, and superiority in battle.

**11. *Good Leadership Can Maintain Cohesion:*** “In the end, meta-analysis of prior gender integrations efforts found that the detrimental effects on cohesion can be mitigated through good leadership, cohesion-building activities, and a shared sense of identity among men and women.”<sup>49</sup>

**Response:** This unsupported comment is footnoted to RAND National Defense Institute researchers. The comment inaccurately describes cohesion in civilian terms such as getting along socially or working together on tasks, not mutual trust for survival in combat. Findings and observations observed during a short-term, controlled experiment (GCEITF) suggest that cohesion would decline even more during oversea deployments and direct ground combat conditions.

- a) Surveys of GCEITF personnel were conducted during the forming period, the training period, and the research period. Volunteers were divided by gender regarding their support for female Marines in combat roles, with females strongly supporting.<sup>50</sup>
- b) Post-training, cohesion levels averaged medium to good across the ITF, with 31% males and 36% reporting very good cohesion. Post-assessment, the average cohesion levels dropped to medium, trending to poor.”
- c) The report continues, “Analysis suggests that lowering standards or giving women preferential treatment would be detrimental to cohesion and morale.” (p. 30)

**12. *Men’s Attitudes are the primary barrier to successful gender integration.*** RAND’s report for the Marine Corps identified “hypermasculinity” as the primary cause of resistance to gender integration.<sup>51</sup> Army Training and Doctrine Command (TRADOC) also has targeted men’s attitudes as “traditional impediments” that need to be overcome with “*proactive measures to mitigate resistance to women going into these specialties.*”<sup>52</sup>

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<sup>49</sup> Marine Corps Analysis, FN #12, *supra*, p. 21.

<sup>50</sup> Marine Corps Analysis, FN #12, *supra*, p. 30)

<sup>51</sup> RAND Report, FN # 38, *supra*, p. 22.

<sup>52</sup> TRADOC Commander General Robert W. Cone, interview with American Forces Press Service.

**Response:** Concerted efforts to promote RAND’s prejudiced definition of “masculinity,” applied to all men, would be demoralizing, divisive, and inconsistent with the honorable “brand” and image of the Marine Corps.

- a) This would be especially so if gender-integration “leadership” programs continue to misconstrue masculinity as anti-women.
- b) Defense Department appointees and contractors want to establish a small army of “gender advisors” and “gender integration oversight boards” to mitigate problems created by determined advocates of a gender-free military.<sup>53</sup> This would be an expensive jobs program designed by social engineers who believe that “hyper-masculine” attitudes must be systematically eliminated, while simultaneously forcing women to act like and compete with men.
- c) This a recipe for social incoherence, resentment and division – the opposite of cohesion.

Open-ended expenditures such as this cannot be justified, especially since many of the contractors seeking grants to pursue their agendas have a poor track record of “mitigating” problems they helped to create.

**13. Gender Integration might improve discipline.** “We also see benefits to integrated units in areas in which females traditionally have better outcomes than males; e.g., incidents pertaining to disciplinary issues.”<sup>54</sup>

**Response:** Male aggressiveness sometimes contributes to undisciplined behavior, but the statement ignores the consequences of inappropriate male-female relationships, both voluntary and involuntary. Incidents of sexual misconduct in the military have increased steeply, year after year, in spite of countless hours of leadership training.

- a) To state the obvious in gender-neutral terms, human beings are not perfect, and combat arms personnel are no more perfect than anyone else. There is no compelling reason to extend complicated male-female disciplinary issues into small combat arms.
- b) Disciplinary issues that would have a profound effect on morale and unit cohesion in small fighting teams would include sexual misconduct of all types, accusations of same, distractions that weaken concentration, deterioration of mutual trust, personnel losses associated with pregnancy/maternity leave, absences during legal proceedings, and other types of turbulence that affect readiness.

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<sup>53</sup> RAND Report, FN #38, *supra*, Executive Summary, p. xxii.

<sup>54</sup> Marine Corps Analysis, *supra* FN #12, Summary & Conclusions, pp. iv-v.

- c) Despite enormous efforts to reduce rates of sexual misconduct, the Defense Department’s Sexual Assault Prevention & Response Office (SAPRO) report in 2015 that numbers of actual cases keep escalating year after year. There were 2,828 completed cases in 2012 and 4,608 in 2014 – a 63% increase in only two years. Pentagon officials call this "good news," reflecting confidence in the justice system. If so, what does bad news look like?
- d) Disciplinary problems reportedly occurred during GCEITF operations. A baseline survey done among task force volunteers “identified negative opinions towards social cohesion, disciplinary actions, unit readiness, and the overall success of individual Marines.” <sup>55</sup>
- e) A 2013 Defense Department study survey of 13,000 women found that those who had served in close combat situations reported twice as many sexual assaults by male colleagues. (4% compared to 2.1%) <sup>56</sup>

There are no benefits that would compensate for the extension of complicated male/female issues into the combat arms.

#### **14. *Detrimental effects on cohesion can be mitigated with good leadership.***

**Response:** If “training and leadership” could eliminate these problems, male/female disciplinary issues would have declined long ago.

- a) Despite countless hours devoted to sensitivity and leadership training, various types of misconduct, both voluntary and involuntary, persist in gender-mixed units at all levels and in all communities. These programs, which may have unintended consequences, should be re-evaluated independently. <sup>57</sup>
- b) In an official 2012 survey about moving women into combat units, many male Marines listed being falsely accused of sexual harassment or assault as a top concern. Thousands of men indicated that the change would prompt them to leave the service altogether. <sup>58</sup>

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<sup>55</sup> Hope Hodge Seck, *Marine Corps Times*, [Grunt Life: Marines Dish on the Corps’ Women in Combat Experiment](#), Sept. 7, 2015.

<sup>56</sup> Andrew Tilghman, *Navy Times*, [Female Combat Vets Report More Assaults](#), Oct. 14, 2013, p. 10. Researchers found that women in a high-stress, life-threatening combat setting may find it more difficult to identify, diffuse, or avoid high-risk settings for sexual assault and harassment.

<sup>57</sup> It is possible that some popular but misguided education techniques, such as the edgy role-playing play “Sex Signals,” may be making problems worse.

<sup>58</sup> Julie Watson, AP, [Marine Survey Lists Concerns on Women in Combat](#), Feb. 1, 2013.

## D. RECRUITING and RETENTION

15. ***Effects on Recruiting Likely Would be Neutral or Positive.*** “From a recruiting and propensity perspective, the opening up of these formerly closed MOS/units would likely have a neutral to positive effect, based on survey data.”

**Response:** The next sentence continues: “However, this presumes a voluntary assignment process, if females were to be involuntarily ordered into combat arms units, this could actually lower propensity and female enlistments.”<sup>59</sup>

- a) What if assignments are not voluntary? During his news conference on December 3, 2015, Defense Secretary confirmed that once a woman joins the military she must follow orders in the same way that men must accept unexpected MOS changes, especially in time of war.<sup>60</sup>
- b) CMR has confirmed that Joint Advertising, Market Research, and Studies (JAMRS) a defense contractor that surveys young people to determine their propensity to serve in the military, has never polled young people (and their advisors) on a key question reflecting the absolute reality that Defense Secretary Carter confirmed in December: *Would you join the Marine Corps/military if women would be required to serve in combat arms units such as the infantry on an involuntary basis?*
- c) Recruiters have a tough job and the All-Volunteer Force depends on their success. But young people deserve full disclosure of the obligations they would have to accept along with the benefits of military service. Many will still want to sign up, but all should know the legal and physical liabilities.
- d) In particular, young women should know that hazards to their health in the new Gender-Free Military would be greater than they are for men of the same age, and “choice” of MOS would not be an option if quotas or military requirements have to be met.

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<sup>59</sup> Marine Corps Analysis, FN #12, *supra*, Summary & Conclusions, p. v.

<sup>60</sup> Transcript, Dec. 3, 2015. In June 2013, while testifying before the House Armed Services Personnel Subcommittee, Marine Lt. Gen. Robert Milstead confirmed that women would be assigned on the same involuntary basis as men. Rep. Loretta Sanchez (D-CA) asked Gen. Milstead about women who aren't interested in “that combat thing.” Could such assignments be a matter of “choice?” He responded by noting that military assignments are not voluntary. “That's why we call them orders,” he said.

- e) According to non-service specific surveys done between January 2013 and March 2014, the announced change in policies affecting women caused 12% of male respondents and 20% of females to say they would be less likely to join the military. <sup>61</sup>
- f) An official 2012 survey found that about 22% of male Marines and 17% of female Marines said they would be likely to leave if women move into combat positions. <sup>62</sup>

**16. Negative consequences will be temporary.** “[S]ome of the initial negative impacts are likely to diminish over time...attrition rates...when compared to male attrition rates...are also likely to diminish over time.” <sup>63</sup>

**Response:** This is wishful thinking that is not supported by empirical evidence or experience.

- a) Personal and family choices are primary reasons why women leave the military before attaining high rank. There is no reason to believe that women will be more likely to forego personal and family choices in order to stay in the military while eligible for the combat arms. An official Army survey suggested that the opposite would be true. <sup>64</sup>
- b) It is more logical to expect that gender-integration issues would persist and trigger even more complicated problems, such as consensual and non-consensual sexual misconduct, in the combat arms. This would erode combat effectiveness, not improve it.
- c) Assurances from the same people who have failed to “mitigate” these problems, despite untold millions of dollars and man-hours devoted to sexual assault awareness training, cannot be considered credible. There would be no benefits, in terms of military effectiveness, to offset the consequences of extending sexual misconduct problems into the combat arms.

**17. *Previous gender-integration efforts in the military were successful.*** “A thorough review of previous gender-integration experiences, in particular the opening of Marine Corps logistics and aviation occupational fields, suggested that unit and personnel readiness do not change

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<sup>61</sup> USMC Recruiting Command presentations titled [Female Enlisted Marine Accessions Brief to DACOWITS](#), Col. Smitherman, March 2014, p. 7; and Col. T. D. Trenchard, [Efforts to Influence Propensity to Serve and Increase Female Accessions](#), 19 September 2014, p. 7. CMR obtained additional data regarding propensity to serve in the Marine Corps from June 2011 through Spring 2014.

<sup>62</sup> CMR: [Survey of Marines Fails to Show Support for Women in Direct Ground Combat Units](#), posted on [www.cmrlink.org](http://www.cmrlink.org), February 2, 2013.

<sup>63</sup> Marine Corps Analysis, FN #12, *supra*, Summary & Conclusions, p. v.

<sup>64</sup> AP and *USA Today*: [Few Women Want Combat Jobs, Survey Says](#), Feb. 24, 2014. Among Army women surveyed, 92.5% said they would not accept land combat assignments if they were offered.

significantly following gender integration. . . Ultimately, the effect of gender integration, at both the unit and individual Marine level, was largely determined by leadership and training.”<sup>65</sup>

**Response:** The information provided to support the claim primarily relates to military women’s careers and lack of bias against them. This is nothing new.

- a) For decades, Defense Department reports have indicated that military women are promoted at rates equal to or faster than men.
- b) In addition, Marine logistics and aviation MOSs are not comparable to infantry and other direct ground combat battalions that seek out and attack the enemy with deliberate offensive action. The issue is combat effectiveness, not career opportunities.
- c) In Afghanistan and Iraq, some Marine and Army women served “In Harm’s Way” in Female Engagement Teams (FETs) and Cultural Support Teams (CFTs). These teams deployed with DGC forces in war zones, working with and gathering intelligence from civilian women and children. These missions were dangerous and worthy of respect, but they did not fit the definition of direct ground combat: seeking out and attacking the enemy with deliberate offensive action.

#### **E. History, Other Countries, Selective Service and Future Evaluations**

**18. Gender diversity will be accomplished in the same way as racial diversity.** “Further integration of females into the combat arms brings with it many of the general benefits of diversity that we experience across the spectrum of the workspace, both within the military as well as the private sector.”<sup>66</sup>

**Response:** Unity of purpose in war is far more important than gender diversity, a quality that has little or nothing to do with combat effectiveness. Potential adversaries of the United States do not waste time on social engineering and mandates for “gender diversity metrics,” another name for quotas.

- a) President Harry Truman strengthened the armed forces when he confronted irrational prejudice in the military with his 1948 Executive Order outlawing racial discrimination. The Order advanced equal opportunity, but its primary purpose was military necessity.<sup>67</sup>

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<sup>65</sup> Marine Corps Analysis, FN #12, *supra*, p. 18.

<sup>66</sup> *Ibid.*, Summary & Conclusions, p. iv.

<sup>67</sup> Report of the Presidential Commission Presidential Commission on the Assignment of Women in the Armed Forces, November 1992, Commission Finding (CF) 1.33 and CF 1.33A, p. C-40.



- b) Racial differences are not consequential in battle, but gender differences are profound and relevant to ground combat realities. Assigning highest priority to gender diversity will not alleviate reality-based concerns about combat survivability and lethality in battle. There is no military need to assign women to combat arms units that attack the enemy.
- c) The Pentagon has enthusiastically embraced recommendations of the Military Leadership Diversity Commission (MLDC), which instigated the drive for women in land combat in its 2011 Final Report.<sup>68</sup> The Defense Department and military services are enthusiastically implementing MLDC recommendations for “gender diversity metrics,” another name for quotas. The MLDC also called for a “Chief Diversity Officer” (CDO) to enforce diversity quotas through the promotion process.
- d) The MLDC report admitted that the new “diversity management” would *not* be about “treating everyone the same,” adding, “This can be a difficult concept to grasp, especially for leaders who grew up with the EO-inspired mandate to be both color and gender-blind.” This concept, if implemented, would be a radical departure from the military’s honorable tradition of recognizing individual merit.

**19. In other allied nations, harmful consequences have not materialized.** Marine Corps Force Innovation Office personnel conducted several visits to exchange information with commanders of gender-integrated units in allied armies. “[A] thorough review of the experience of NATO and Allied nations was conducted. The review of these studies indicated that concerns about the detrimental impact of women on military readiness and cohesion have not materialized.” (p.19)

**Response.** The allied nations in question, Great Britain, Israel, Canada, and Australia do not use women in direct ground combat units comparable to DGC units in the United States.<sup>69</sup>

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<sup>68</sup> [From Representation to Inclusion, Diversity Leadership for the 21st-Century Military](#), Final Report, March 15, 2011. Instead of being blind to racial and gender differences, the MLDC report recommends race and gender consciousness. It repeatedly pushes for “*diversity metrics*,” which are supposed to enforce race- and gender-conscious “*inclusion*” that goes beyond EO [equal opportunity], and “*needs to become the norm.*” (p. 18, 97)

<sup>69</sup> Neither Britain nor Israel use female personnel in DGC units comparable to those in the United States. See CMR Policy Analysis: New British Report Shreds Case for Women in Ground Close Combat (GCC), FN #15, *supra*, and CMR: [Israeli Defense Force Decides: Armored Tanks Will Stay All-Male](#). The Canadian Forces (CF) are allied with the U.S., but their primary mission is peacekeeping, not offensive warfare. In a 1989 decision by the Canadian Human Rights Tribunal, all combat positions in the Canadian Forces (CF), except submarines, were opened to women. The primary purpose was equal opportunity. No attempt was made to consider the impact on operational readiness or unit effectiveness. (Presidential Commission Report, CF 1.129, P. C-67) The Australian push to assign female soldiers to land combat units was the direct result of a sex scandal at the nation’s military academy. Even though Australia offered various incentives, interest among women has been low. The culture of the Australian military is not comparable to that of the United States.

- a) None of these allied nations have militaries that engage in direct ground combat to the extent that America's armed forces do.
- b) There are no discussions of gender-integration policies of potential adversaries, such as North Korea, Iran, and jihadist forces such as ISIS and Al Qaeda.

**20. Selective Service Registration on an equal basis is only "fair."**

**Response:** When the U.S. Supreme Court decided the 1981 *Rostker v. Goldberg* case, which upheld women's exemption from Selective Service obligations, the court recognized and deferred to the diligent oversight that Congress had given to the issue in 1979. At the present time, however, Congress has not determined what the policy should be on Selective Service registration, and the administration is not likely to retain or defend women's exemption in court.

- a) In the landmark *Rostker* ruling, the Supreme Court upheld the right of Congress to exempt women from Selective Service obligations on the same basis as men:

"The purpose of registration was to prepare for a draft of combat troops. Since women are excluded from combat, Congress concluded that they would not be needed in the event of a draft, and therefore decided not to register them . . . Men and women, because of the combat restrictions on women, are simply not similarly situated for purposes of a draft or registration for a draft." (453 U.S. at 77-78)

- b) Professor William A. Woodruff of Campbell School of Law, who retired from the Army as a colonel and served as a Judge Advocate General, notes that the *Rostker* decision was an easy call. Since women were not eligible for direct ground combat, they were not "*similarly situated*" with men and did not have to be treated the same as men under Selective Service law. "However," wrote Woodruff, "If we remove the combat exclusion, the obvious result is that women and men are 'similarly situated' and the justification for *Rostker* is no longer present."

- c) In a May 14, 2014 letter the Defense Department acknowledged that the "factual backdrop in the *Rostker* decision was in the process of changing, but "the Court in *Rostker* did not consider whether other rationales underlying the statute are sufficient to limit the application of the Military Selective Service Act to men." There are three things wrong with the current situation:

- Decisions as consequential as this should be made by Congress, not federal courts.
- No one can predict or guarantee what a future Supreme Court will decide.

- The Executive Branch and its key appointees are on record in favor of imposing Selective Service obligations on an equal basis; they cannot be counted on to defend the legality of exempting women from Selective Service obligations.

The Administration and its key appointees are on record in favor of imposing Selective Service obligations on an equal basis; they cannot be counted on to defend the legality of exempting women from Selective Service obligations.

- d) Ordering women to register for Selective Service is not necessary; there is no need to draft women to be “combat replacements.” If there is no need for such a draft, there is no need to register women.
- e) In all wars in American history, women have volunteered to support the war effort and will do so again.
- f) Unlike Israel, which has conscription, this is a free and so-far secure country. Young people should not be conscripted when there is no compelling national reason to deprive them of their freedom.
- g) Military conscription would be especially unfair to women, who do not have an equal opportunity to survive, or help fellow soldiers survive, in a direct ground combat environment. Nor is there a need to burden the Selective Service system to register great numbers of individuals who are not qualified for military service.

Some people have argued that registration should be scrapped all together, which would be unwise. The system is a relatively low-cost insurance policy that should not be dropped because of gender integration.

## **21. Gender-integration policies will be monitored and assessed.**

**Response:** In July 2015 the General Accountability Office (GAO) reported that the Department of Defense has no plans to evaluate the results of this social experiment – the most consequential since the disastrous Vietnam-era Project 100,000.<sup>70</sup> GAO recommends that the Defense Department devise such a plan, which will very likely involve outside contractors such as RAND.<sup>71</sup>

<sup>70</sup> Kelly M. Greenhill, *New York Times*, [Don't Dumb Down the Army](#), February 17, 2006. During the Vietnam War, Defense Secretary Robert S. McNamara created Project 100,000 to help approximately 300,000 men who annually failed Army aptitude tests. Many “Category IV” recruits, known as “New Standards Men,” were relegated to “soft skill” jobs or the infantry, where they were 2 ½ times more likely to die in combat. Eleven times more had to be re-assigned, and 9 to 22 percent required remedial training. New Standards Men involved in the failed experiment fared no better than non-veteran counterparts, and many suffered post-combat psychological problems.

<sup>71</sup> U.S. Government Accountability Office (GAO) Report, Military Personnel: [DoD is Expanding Combat Service Opportunities for Women, but Should Monitor Long-Term Integration Progress](#), July 2015. A section of Brig.

- a) Since the 1990s, RAND has provided to the Defense Department reports that misstate issues and declare “success” for the consequences of their own policy recommendations, despite contrary evidence.<sup>72</sup>
- b) If RAND or other organizations that advocated for women in the combat arms are invited to evaluate the results of their own recommendations, and to withhold problematic information, all social experiments will be declared “successful,” no matter what.

The Executive Branch’s unilateral plans to order military women into the combat arms rely upon best-case scenarios and unsupported assumptions that are not the basis for sound policy. This remains a social experiment with known and unknown high risks to individual lives, missions, and national security.

The next Commander-in-Chief, therefore, must take the lead, starting with orders to all appointees and military officials to provide complete and candid information on what has been done to our military during eight years of social experimentation since 2009.

Current military leaders must follow orders, but the next president will have the power to change existing directives in the same way that the current president imposed them. Leaders of the next administration should be prepared to restore sound priorities, putting the needs of the military first.

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*The Center for Military Readiness is an independent, non-partisan public policy organization, founded in 1993, which reports on and analyzes military/social issues. More information is available on the CMR website, [www.cmrlink.org](http://www.cmrlink.org).*

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General George Smith’s memo cited in FN #13, *supra*, supports a “Long-term Assessment” of the results of gender integration. It mentions RAND and/or CNA (Center for Naval Analysis) to do the assessments, for as long as 10 - 20 years. (Sec. 5, p. 10) Appendix II of the GAO report cited above lists many outside organizations that have been working on various phases of the Women in Services Restrictions Review (WISRR). The Defense Department Office of the Under Secretary for Personnel & Readiness lists RAND as the primary contractor.

<sup>72</sup> [CMR Analyzes 1997 Rand Study](#), and [Rubber Stamp RAND Report Promotes Women in Land Combat](#), Oct. 1, 2007.

## IV. GCEITF Measurements of Differences in Performance Tasks Simulating Direct Ground Combat

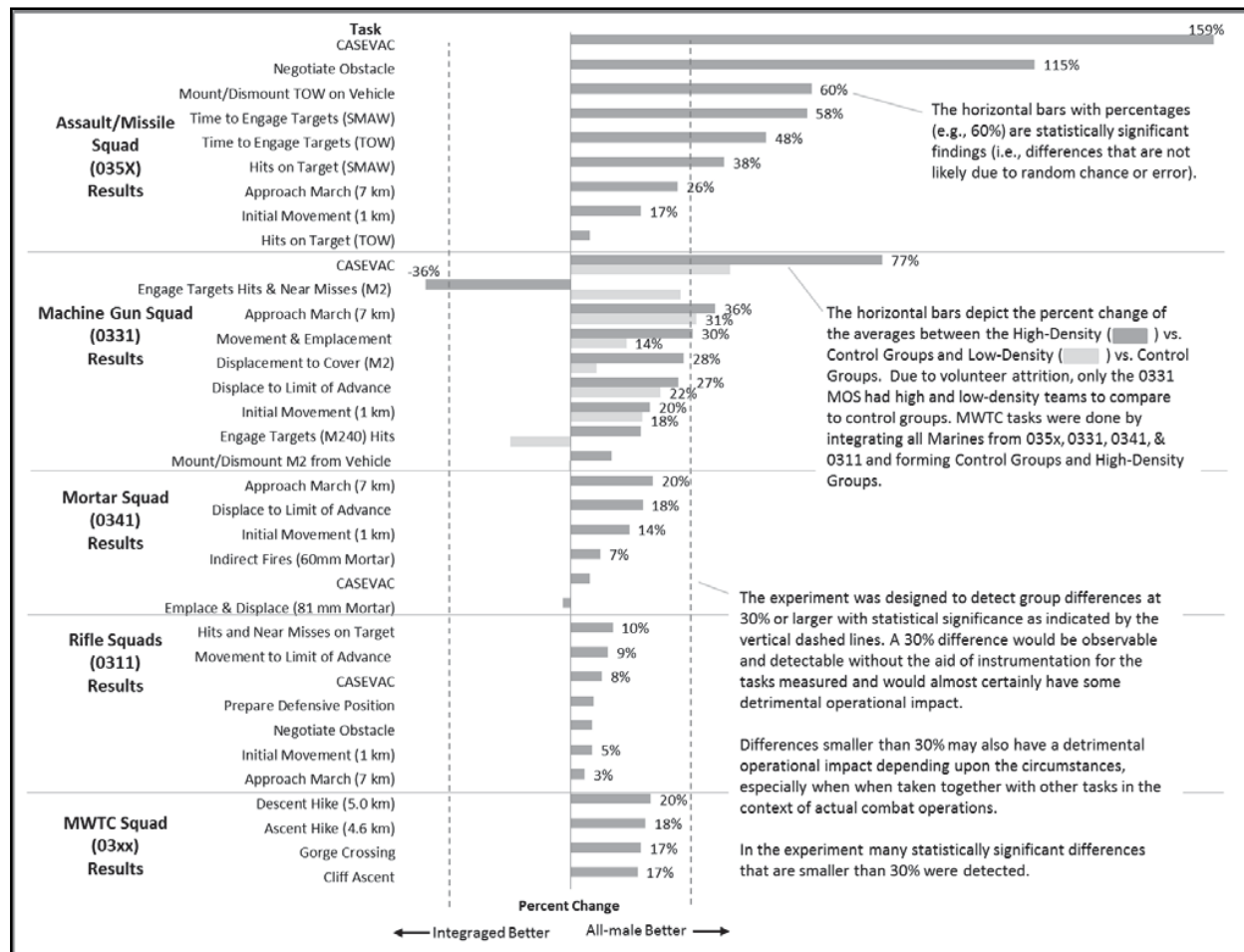


Figure 12. Infantry Summary Comparison of Percentage Change of All Tasks

Figure 12 presents a summary of the differences observed when comparing all-male infantry squads to integrated task force squads. The horizontal bars depict the percentage change observed when comparing the average all-male squad result to an average gender-integrated squad result on common infantry tasks such as casualty evacuation (CASEVAC). The numerical percentage presented adjacent to the bar is indicative of statistical significance, which is related to the size of the difference, variation, and the number of trials for that task. When a bar shifts to the right of the centerline the all-male group's average is better than the integrated group's, and vice versa. (Darker bars indicate "high density" units with more than two women; lighter bars represent "low density" units with two women or less.) (pp. 9-10)

Machine Gun Squad (0331) results were better for gender-mixed units in the "Engage Targets" category, but high-density squads took significantly longer to displace from the firing line compared to both the all-male and low-density integrated 0331 squads. (p. 25)

(Source: Marine Corps Operational Test & Evaluation, Activity Report, 14 August 2015, Ground Combat Element Integrated Task Force Experimental Assessment Report – For Official Use Only – p. 29)