INTEGRATION OF WOMEN INTO COMBAT UNITS

by

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The contents of this paper reflect my own personal views and are not necessarily endorsed by the Naval War College or the Department of the Navy.

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Some United States combat units will soon begin to integrate women combatants. An analysis of the likely impact of the integration process is conducted to delineate key concerns for operational commanders. The issue treated here is not whether women should participate in combat, but how to minimize the disruption that this major organizational change could cause. The spectrum of choices now open to policy makers ranges from minimal changes to a full integration in all military services' combat units. To ensure that their forces maintain combat capability while integrating women, commanders must first gain an understanding of the possible mission impact of the various policy options. Then they must communicate any concerns to policy makers in the Executive Branch and the Department of Defense. They must also begin to prepare for the eventuality of integrating female combatants into at least some combat units. Commanders should advocate minimizing interservice differences, emphasizing qualifications instead of quotas, and preserving their own flexibility in the conduct of wartime operations.
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INTEGRATION OF WOMEN INTO COMBAT UNITS

CHAPTER I

INTRODUCTION

During Operations Desert Shield and Desert Storm, some 35,000 United States military women deployed to the Persian Gulf. They faced the risk of capture and were exposed to hostile fire, and some of them flew "noncombat" aircraft deep into Iraq. Responding to the largely positive reports of these women's performance, Congress repealed the laws that had excluded U.S. servicewomen from flying combat aircraft. Congress also created a presidential commission to study the services' assignment policies and to recommend any changes deemed necessary. During 1992, as the commission conducts its deliberations, Department of Defense (DOD) officials will also study the issue and make policy recommendations.

Operational commanders thus have only a short time to influence the policies which will govern the integration of women into combat units. It is imperative that commanders get involved now, because the new policies will directly affect their combat forces. It is equally important for commanders to begin formulating integration plans that apply lessons learned in the past. By acting now, commanders can ensure that both their operational flexibility and their units' combat effectiveness will be preserved.

Chapter 2 presents and defends a central assumption of this paper: that American operational commanders will soon command women combatants. The aim of this paper then becomes
to give the operational commander a starting point from which to influence policy and to begin planning for the integration of military women into combat units.

Chapter 3 familiarizes the reader with the current situation by examining the evolution of DOD policy on women in combat, including the recently-repealed combat exclusion statutes and the DOD "risk rule." It details the growing participation of women in the U.S. military through the Gulf War and explores the dynamics leading up to the statutes' repeal. Importantly, many of these dynamics will continue to affect the commander as he integrates women combatants.

It is difficult to predict which combat units will be integrated as a result of the current policy review. Chapter 4 discusses the range of options available to the presidential commission and the services. In Chapter 5, the focus shifts to how these policy options would affect the commander's mission, the adversaries he might have to fight and the troops under his command.

Next, Chapter 6 suggests ways in which the commander might best go about implementing whatever level of integration the new policy dictates. The vital importance of beginning to plan for implementation is discussed, as are some lessons from past experiences with both gender and racial integration of the U.S. military. Lastly, Chapter 7 lists several conclusions and recommendations aimed at minimizing the mission impact and organizational turbulence which may be expected to accompany the new policy.
CHAPTER II
WHY CHANGE IS COMING

The exclusively-male American combat force will soon become a thing of the past. While some units will doubtless remain all-male for the foreseeable future, there is no longer any possibility of forestalling some degree of change.

The first harbinger of change was the lifting of combat exclusions by several North Atlantic Treaty Organization (NATO) countries in recent years. Canada has no restrictions on the assignment of women within its Air Force. Canadian women first became CF-18 pilots in July, 1989, two years after trials were approved by the Canadian Minister of Defense. Great Britain lifted its exclusion on women serving aboard combatant ships before the Gulf War. Furthermore, in December, 1991, the British Ministry of Defense announced that it was lifting its restrictions on women flying Royal Air Force fighter aircraft in combat. This means that, even if the US retains its combat exclusion policies, US operational commanders may well be given command of allied forces which include women combatants. In combined operations, U.S. aviators may fly alongside allied women combat aviators from several NATO countries.

Second, US military leaders have made statements that suggest a willingness to suspend the combat ban. Testifying before the House Armed Services Committee's Military Personnel and Compensation Subcommittee in March, 1990, Lt. Gen. Thomas A. Hickey, Air Force Deputy Chief of Staff, Personnel, stated:
If we are ready to put women in combat, the one thing I am sure of is there is probably not a combat job in the United States Air Force that women cannot do. They can fly fighters, they can pull G's...They are physically capable, I think they are mentally capable; and so the issue is if you want us to put them there, just remove the law and the Air Force will do that.4

In hearings held after the Gulf War, Adm. Frank B. Kelso 2d, Chief of Naval Operations, and Gen. Merrill A. McPeak, Chief of Staff of the Air Force, both said "they would support greater roles for women if existing law was changed."5 More recently, Lt. Gen Billy J. Boles, Air Force Deputy Chief of Staff for Personnel, has told a Congressional subcommittee that the Air Force has decided to institute a "gender-free" assignment policy for aviators.6 Lt. Gen. Boles said that the Air Force will begin to make changes once it decides how to phase in its "gender-free" assignment policy.7

This willingness to integrate combat units extends beyond combat aircraft. Vice Admiral Roger F. Bacon, Assistant Chief of Naval Operations for Submarine Warfare, said that the Navy was planning for the possibility of women submariners aboard the next-generation Centurion-class submarine.8

Third, some members of Congress are likely to continue pressing the services until women are fully integrated in aviation. Congresswoman Beverly B. Byron has criticized the current delay in opening combat aircraft to women as "circumventing the intent of Congress."9 Byron said that "if women can meet the same standards, there is no reason why they shouldn't be given the opportunity" to fly combat aircraft.10 As Chairman of the House Armed Services Committee's Military Personnel and Compensation Subcommittee, Byron has held
several hearings on the status of women in the military and has pushed for relaxation of many restrictions on their employment.

Christopher Jehn, Assistant Secretary of Defense for Force Management and Personnel, told Byron's subcommittee on January 29, 1992, that "This is a major change, a serious one that we want to do correctly." Jehn and the service personnel chiefs claim that doing the job correctly will require an in-depth review of all aspects of the issue, but an impatient Congress is unlikely to be satisfied until women actually occupy combat cockpits.

Lastly, many women pilots have expressed their dissatisfaction at being limited to flying noncombat aircraft and have resolved to take their case to their elected representatives. Along with male officers, enlisted women, Women Air Service Pilots from World War II, DACOWITS members, and civilian lobbyists, they visited Senate staff members in July, 1991, to urge the Senate to lift the combat exclusion. Commander Rosemary Mariner, USN, a former flying squadron commander, expressing her personal views and not those of the Department of the Navy or the Department of Defense, said that "there is nothing more to study about men and women flying combat missions...Ability, not gender, should decide who fights our next war from the skies." Since women military aviators are among those most affected by combat exclusion, their views are likely to be considered.
CHAPTER III
THE COMBAT EXCLUSION

Before contemplating the possible ways in which women will be integrated into U.S. combat units, it is critical to understand some of the policies that have governed women’s participation in the U.S. military to date. This will give us a starting point from which to envision both the policy options which are likely to be considered and the impact each option would have on the U.S. military. One of the most important determinants of the role of today’s servicewoman has been the combat exclusion law.

The combat exclusion law came into being only after World War II, when 350,000 women served their country in uniform. The exclusion was part of the Women’s Armed Services Integration Act, which became law on June 12, 1948. It prohibited women from flying Air Force and Navy aircraft in combat and from serving aboard combatant ships. In the following decades, this law had extensive impact on the United States military. As the number and occupations of military women steadily expanded with the coming of the All-Volunteer Force in the 1970s, the law engendered the concern of military commanders who feared it might limit their flexibility in wartime.

Nevertheless, women’s participation in non-traditional military jobs grew rapidly. While the combat exclusion remained in place, the service academies admitted women in 1976 and by the late 1970s women were piloting a variety of
military aircraft. Incremental changes continued through the 1980s, with a gradual widening of the types of ships and planes women could be assigned. Lawmakers, military women, and commanders all began to question the definition of combat--most agreed that technology had made it impossible to protect servicewomen from the hazards of war. Furthermore, with the assignment of women to intercontinental ballistic missile combat crews, it became clear that women would be on the front lines of a nuclear war.

Concerns continued, however, about the risk to female noncombatants and inconsistencies between the services’ combat exclusion policies, leading to the adoption of the DOD "risk rule" in 1988. The rule allows the services to close noncombat jobs to women only if the type, degree, and duration of their risk to direct combat, hostile fire, or capture equals or exceeds that faced by combat units in a given theater of operations.\textsuperscript{14}

As mentioned earlier, by 1989, five of the United States’ NATO allies had abandoned their own combat exclusion policies. Canada began training women as fighter pilots,\textsuperscript{15} and Great Britain opened combatant ships to women. American attitudes were changing too: according to a poll taken in January, 1990, 70\% of Americans thought women should be permitted to serve in combat billets.\textsuperscript{16}

Operations Desert Shield and Desert Storm provided important lessons about the capabilities of women in modern warfare. And despite the existence of the risk rule,
"thirteen women died, including five that were considered combat fatalities, and two more were taken prisoner." Major Marie T. Rossi, an army helicopter pilot who flew into Iraq in support of deep air assault operations, was one of those killed. The risks faced by even rear-based support units were underscored when both male and female Army reservists were killed in a SCUD attack on Dhahran.18

After Desert Storm, the Defense Advisory Committee on Women in the Services (DACOWITS) called for the repeal of the combat exclusion laws. Congress obliged by removing the ban on combat aircraft, and also created a presidential commission to study the issue for one year. Commission members are to be selected by mid-February, 1992, and their report is due on December 15, 1992. The commission will have the authority to assign women to any previously all-male combat units for testing purposes.19

The legacy of the combat exclusion laws remains, at least for the present. Title 10, U.S. Code, still prohibits Navy women from serving on combatant ships. Army women, who were never the subject of a combat exclusion law, are prohibited from serving in combat units by Army policy. Furthermore, although women make up 10.9% of the U.S. military, none now serve in combat billets.20 The DOD risk rule is still in force, keeping women out of some high-risk noncombat jobs. What happens next is up to the presidential commission, the services, and Congress.
CHAPTER IV
AVAILABLE POLICY OPTIONS

Now that we have an understanding of the dynamics which make change inevitable and of the background of women’s involvement in the U.S. military, the critical question is, "To what extent will women combatants affect the conduct of war at the operational level?" The answer depends in part on the recommendations of the presidential commission and the services. By examining the options open to policy makers, it should be possible to predict the range of situations the operational commander may soon face.

One option the commission and the services could select is to continue the status quo, in effect creating a DOD policy which keeps in place the current restrictions on women in combat. For the reasons detailed above, this option probably will not be selected. However, even if it is, Congress shows signs of readiness to mandate changes. For example, Senator William V. Roth, Jr., who helped repeal the combat exclusion law, "has threatened new legislation that would force the services to act more quickly." Further, as pointed out earlier, the operational commander would still need to assess the impact of women’s inclusion among allied air forces and their possible presence in combined formations.

Another possibility is to integrate women into some combat aircraft or ships but not others. This might be an appealing alternative because it would continue in the spirit of the current DOD risk rule, which attempts to minimize the risk
faced by women noncombatants. Indeed, a careful reading of the risk rule reveals an underlying assumption that noncombat units can face the same or even higher risks than combat units. Using similar logic, policy makers could attempt to define an acceptable level of risk to women flying combat aircraft. The services might be asked to assess the amount of risk faced by various combat units or aircraft, and women might be allowed to fly those combat aircraft classified as "low risk". For example, the F-117 stealth fighter might be classed as lower risk than the A-10, and might be opened to women. This option probably would be acceptable to some members of Congress, while others are likely to continue pushing until all aircraft are opened to women.

The policy makers could also lift the restrictions on women flying all combat aircraft. In doing so they would follow the lead of other NATO countries. This choice could draw fire from some conservative groups who oppose women in combat. Given the recent votes to lift combat restrictions for women, however, Congress would probably go along with this recommendation.

A final possibility within the purview of the committee and the DOD would be to recommend integration of women into all naval combatant ships and ground combat units along with combat aircraft. Such a move would avoid the inconsistency of having women combat aviators on board ship while barring women from other shipboard billets, but it would be a much more sweeping change. However, there is less support in the
military and in Congress for opening combatant ships and ground combat jobs to women. Gen. Carl E. Vuono, and Gen. Alfred M. Gray, then Chiefs of Staff of the Army and Navy respectively, both told Congress that they opposed repealing the combat exclusion laws. Consequently, the operational commander is less likely to face integration in his combatant ships or ground forces than in his air forces.
CHAPTER V
IMPACT ON THE OPERATIONAL COMMANDER

Depending upon which policy option is adopted, the operational commander faces a variety of scenarios. To a greater or lesser extent, all could affect his combat missions, the enemy he faces, and the troops under his command.

Mission. Concerns have been raised over women's physiological ability to fly combat aircraft and perform other combat jobs. Another concern is that even if women perform well in training, they might not do as well as men when faced with actual combat conditions. Either of these allegations, if true, should be of great concern to operational commanders. The central issue for many observers is whether performance standards would be lowered to increase the number of women who fill combat billets. If standards are kept the same, those women who qualify for combat billets should have a neutral or positive impact on the quality of combat units. However, if standards are lowered, quality might well drop.

Another physiological difference between women and men which commanders must consider is childbearing. The commander must ensure that his units' manpower authorizations are consistent with the lost duty time pregnant women and new mothers experience, to avoid losing combat capability. A discussion of single parenting is beyond the scope of this paper. 40,000 of the military's 67,000 single parents are men, making the issue a broader one than women in combat.
Likewise, child care arrangements for couples who are both deployed is already a concern of the commander, whether women participate as combatants or not.

Another area in which the commander could expect to find some mission impact is the American public's reaction to large numbers of female casualties or prisoners of war. Army Major Rhonda Cornum, a flight surgeon taken prisoner by the Iraqis, claims her operations officer did not consider gender when selecting her for a search and rescue mission:

> When it came time for the helicopter to go, the operations officer said, ‘You have Doc Cornum on board?’ They knew the guy we were going to pick up had a broken leg. It had nothing to do with me being a girl. Hopefully, what will change is people will realize that the American public was in fact not horrified...

Even though the American people seem able to accept the death and capture of military women in noncombat occupations, they may react differently when they see women deliberately sent into combat. With only 13 women killed in Desert Storm, the possibility remains that large numbers of female casualties may cause public support to wane, thus affecting the commander's mission.

The commander can expect a major impact on his mission if he is asked to manage the amount of risk faced by the women under his command. For example, if the theoretically less risky F-117 is to be used against a heavily-defended target in daylight and without air superiority, would a commander hesitate to send a woman pilot on the mission? If so, he would give up an important degree of flexibility in accomplishing the mission. For this reason, the current DOD
risk rule does not require commanders to evacuate or otherwise minimize the risk to female soldiers during hostilities.

**Enemy.** The enemy’s attitude toward women could also become a concern to the operational commander. Some Confederate forces in the Civil War are reported to have committed atrocities against black Union soldiers. It is difficult to predict whether an enemy will engage in this type of behavior, but the operational commander must be alert to this possibility and the impact it may have, both on public support for the operation and on his troops’ morale.

The enemy’s treatment of captured women combatants could become an issue. The emotional reaction of the American people when confronted with a videotaped "confession" of a female combatant is hard to predict. Thus it cannot be ruled out as a consideration by the commander.

**Troops.** There has been much speculation over the probable reaction of men to having female comrades-in-arms. Although men and women work well together in noncombat units, there could be some different dynamics in combat units. Some have predicted that men would be more protective of a downed female squadron mate. Another concern is that women might not be able to bond with men to produce the *esprit de corps* that binds combat units together. To the extent these dynamics exist, they become the concern of the commander.

A soldier or airman’s morale also can be affected by equity issues. Should the commission and DOD choose to retain the *status quo*, complaints will continue about women being
allowed to reap the training and other benefits of being in the military without having to brave the risks of combat or to pull their fair share of rotations at sea. Yet if combat duty is opened to women, many will see an unfairness, not to mention an elevated cost, in standing a woman down from combat or flight duty due to pregnancy. Although cost is not the main concern of the commander, perceptions of unequal standards are. Even if the commission accepts the added costs of pregnancy, it cannot mandate similar acceptance by the troops.

Some might see the above discussion of operational challenges as reason enough to refrain from making the change. Others may not be deterred in the slightest at the prospect of facing these challenges. What is important is to realize that regardless of one’s personal opinion, the policy makers will have the final say. The commission and the DOD could decide, as have other countries’ governments, that considerations of fairness, equal opportunity, and military efficiency outweigh the problems which may be encountered. Human resistance to change is a well-documented phenomenon: it can be managed and its effects can be mitigated. It is not in itself a sufficient reason for avoiding change.

The commander nevertheless faces at least a short-term adverse impact on morale, along with the possibility of additional factors mentioned above. Therefore, he not only must get involved in the policy making process, but also must prepare for the changes that might soon affect his mission.
CHAPTER VI
MANAGING CHANGE

All commanders whose mission could be affected by the integration of women into their combat units have a responsibility to communicate their concerns to the policy makers. The policy makers can address many concerns by consulting the dozens of reports on women’s capabilities and performance in military jobs, and even in combat. Other concerns can only be addressed hypothetically: for example, the reaction of the American public to large numbers of female casualties. In any case, the commander must become personally involved to see that his concerns are dealt with.

In particular, the commander must insist that he not be asked to give up the flexibility he needs to accomplish his mission. As Assistant Secretary of Defense Jehn has said, the DOD wants "maximum flexibility in regulating women in combat." By making his concerns known early and often to the policy makers, the commander thus has a good chance of retaining the versatility needed for success in combat.

Equally important, however, is the need for planning: commanders must start preparing now so they can implement any of the options mentioned in Chapter 3 while addressing the concerns in Chapter 4. The penalties for poor planning could be severe: a bad plan could result in either a loss of combat effectiveness or quotas mandated by an exasperated Congress.

Nevertheless, few plans now exist for integrating women into combat arms. Perhaps this stems from the gradual
acceptance of military women who have proven they can perform nontraditional jobs. Perhaps there is no reason to think that women combatants will meet significantly more resistance than women noncombatants.

However, judging from the service personnel chiefs’ recent testimony and from articles written by Navy officers and published in the February, 1992, issue of the U.S. Naval Institute’s Proceedings, gender integration will be an issue. Military members regard the arrival of women in the combat arms as a real watershed, and the impact on the military’s culture—and possibly combat effectiveness—will be so profound that the implications need to be examined in advance. One Navy fighter pilot writes:

General Robert H. Barrow, a former Commandant of the Marine Corps, put it in the simplest terms: "If you want to destroy the combat effectiveness of a unit, put a woman in it." 28

If this is the climate women combatants are about to enter, the commander who lacks a comprehensive plan will probably lose control of the integration process.

Where, then, is the commander to find guidance in preparing to integrate women combatants? Two main sources seem to offer promise: first, the experience of previously all-male noncombat units; and second, the services’ experiences with the integration of blacks. The purpose of introducing the subject of racial integration is not to suggest that sexual segregation compares with racial segregation either in its scale or in its nature. Instead, the purpose is to glean valuable lessons from the experiences
of a group previously barred from full participation in the US military.

In beginning to plan for integrating women into combat units, it is useful to note that past integration of women in the military has been greeted with resistance by senior and junior service members alike. Commanders need to be sensitive to this resistance, while clearly communicating their intent that compliance with the new policy is mandatory. After President Truman directed racial desegregation, the Air Force Chief of Staff, General Hoyt S. Vandenburg, made it clear that commanders would be judged on the success of their units' desegregation. He followed up with inspection teams, and within a year, the Air Force was integrated.29

Another method of overcoming resistance to integrating women combatants is through education. The many studies of women's capabilities mentioned earlier should not be closely held: relevant studies should be shared with the men and women at the unit level in order to debunk myths and promote understanding. Prime candidates for such an education effort would be studies showing the duty time losses due to pregnancy and other causes for both men and women in noncombat units. In addition, service members should also be exposed to lessons learned by foreign air forces that have already integrated women.

Unfortunately, studies may not be made public for political or other reasons, as the black experience shows. For example, in a 1945 survey of white supervisors conducted
by Gen. Dwight D. Eisenhower's staff, 80% said that blacks had performed "very well" in combat. But some Army officers worried that this result would be politically unpopular and might be disruptive if it caused policies to change in the Pacific. Furthermore, Gen. Omar Bradley argued that the survey was not significant, since blacks had participated only during the "mopping-up" portion of Allied operations. As a result, Gen. George C. Marshall decided not to release the report and myths about blacks' incapacity for combat persisted. Commanders should insist on knowing and publicizing the outcome of all relevant studies.

Commanders also can have a positive impact on policy making and implementation if they insist on uniform standards for combat qualification. Military women attest to their ready acceptance by male peers whenever men and women are held to the same standards. To be sure, some desired attributes of combat units, such as combat bonding, cannot be measured prior to hostilities. Still, pre-combat training might be a good indicator of combat performance. For example, despite the widespread belief among the Army staff that blacks would not be willing to fight, the Air Corps found that blacks and whites possessing similar aptitudes had turned in comparable combat performances.

The surest way to defeat women's chances for acceptance in combat units and to lower morale is to impose quotas. The military culture is one that strives to reward performance above all and resents favoritism toward any group. Quotas are
anathema to this culture. In addition, quotas could lead to a perception that all women combatants are less qualified than their male peers, regardless of their demonstrated abilities. Unit morale would drop as the members lost the pride that accompanies membership in an elite unit. Commanders must not only ensure that quotas not be imposed: they also must emphasize that "elite" does not mean all-male any more than it meant all-white.

In implementing change, commanders should anticipate high public interest, and should prepare for some media presence. To date, every time a career opportunity or weapons system opened up to women, numerous articles appeared in the press. Most of these articles are positive, but the commander must be prepared for some critical assessments, particularly if sexual harassment becomes an issue.

If, as mentioned earlier, 70% of Americans agree that women should be permitted to serve in combat billets, public reaction should not be a major concern of the operational commander. The commander must be prepared, however, for high levels of interest in female casualties during the conduct of hostilities.

Blacks have seen a concern over casualties manifest twice, but in opposite ways. During World War II, there was some concern that blacks were under-represented in the military and were not carrying the same risk of injury or death as whites. Yet because blacks are now over-represented in the All-Volunteer army, concerns are now expressed that these
"economic conscripts" will bear the brunt of casualties in wartime. Perhaps Gen. Colin Powell answered this type of criticism best when he pointed out the "opportunities for upward mobility that the military services provided to young African Americans."\(^{33}\)

Finally, the operational commander should shape his plans and advocacy so as to minimize interservice differences in the employment of women combatants. Congressional criticism of inconsistent policies was one factor that led to the DOD risk rule. Moreover, the troops' perception of fairness would be better served by consistent policies. This would in turn promote the development of forces that can work well together in a joint environment. It is likely that men and women will fight better together if they train together. The converse is also true: interoperability problems could ensue if aviators from an all-male Navy squadron first join up with Air Force women combat pilots while en route to the air battle.
CHAPTER VII

CONCLUSIONS AND RECOMMENDATIONS

Change is coming. The evolutionary changes to military women’s utilization over the past twenty years are about to culminate in a revolutionary shift for the U.S. military: operational leaders will soon be commanding both men and women combatants. There is a brief window for the commander to make his needs known to the policy-making establishment and to plan for women’s inclusion into combat units. Once the window closes, the commander must be prepared to implement the new policy.

There are a variety of options open to the presidential commission and the services. They could choose to maintain the status quo, in which case only female members of allied services may take part in combat operations. They could recommend a limited expansion of opportunities for women in some, but not all aviation billets, based on the risk assigned to various platforms. The committee might open all combat aircraft to women. Lastly, they could allow women to hold some ground and shipboard combat jobs in addition to opening combat aircraft. Of the four possibilities, the second and third are most likely.

In preparing for the inclusion of women combatants, the combat commander should insist upon maximum latitude for the employment of women to minimize mission impact. He should anticipate strong resistance to change within his command and should have a program for countering the resistance. An
An education program should be inaugurated, and it should include studies of women's capabilities and limitations. The commander must insist on uniform standards, not quotas, and must insure his intent is communicated down the chain of command. The commander should anticipate high initial interest from the public and media and should plan for media focus on women combatants during hostilities. Lastly, interservice differences in the employment of women combatants should be kept to a minimum.

A change of this magnitude is unlikely to be accomplished without considerable organizational turbulence. If commanders get involved in the policy making process and take a hands-on approach to implementation, they may be able to preserve or even enhance the capabilities of their forces.
NOTES

Chapter I


Chapter II


7. Ibid.


Chapter III


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17. Ibid.

18. Ibid.


Chapter IV


Chapter V

23. Binkin, p. 11.


Chapter VI


30. Ibid., pp. 54-55.

32. MacGregor, p. 140.

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