

## Defining the Terms of Our Struggle:

### On the Role of the Concept of Woman in Political Action

#### **1: What is WOMAN, anyways?**

Feminist activism these last fifty years has been riven by disputes over the meaning of the concept WOMAN.<sup>1</sup> To those who have participated in these movements, debates over the inclusion of trans women, lesbians, black women, and every other identity under the sun are painfully familiar. Yet many feminists believe that it is not a concept we can simply give up on; if we want to say that there is such a thing as sexism, that there are systematic patterns of discrimination against women, that we stand against these things wherever they exist – then we need WOMAN. It is our aim to show how WOMAN is still a concept we can organize around, a concept we can use to answer practical and political questions. In this sense, our project is what Sally Haslanger calls an “analytic” or “ameliorative” account of WOMAN: that is, an attempt to define a concept guided not by extant usage, but by practical goals.<sup>2</sup> But we do not propose some new definition to settle the various boundary disputes that have fractured feminist movements; rather, we propose a new *structure* for the concept. WOMAN is a *multi-valued* concept – to be more precise, it is what Mark Wilson calls a *theory facade*, a series of ideas that are closely connected with each other, yet which gives multiple answers to the question “Is this person a woman?” This idea allows us to simultaneously identify systematic patterns of discrimination and use WOMAN as an effective tool for political organization, while also recognizing that WOMAN is not one thing to all people. Rather than *settling* boundary disputes, we suggest that attention to the particular purposes we deploy WOMAN for help us tell where on the theory facade we are, and what particular prolongations of the concept are salient and useful.

While other scholars have proposed family resemblance views of the concept WOMAN,<sup>3</sup> our account differs from theirs as follows. Firstly, our view introduces the notion of locally definite references that, through processes of natural prolongation, lead to global clashes in application. This local-global tension, and a developmental account of how it arises, is missing from the looser family resemblance view. Secondly, those who have argued for family resemblance views have done it as a descriptive project, not as an analytic project in Haslanger's sense. Perhaps the analytic account ours resembles most is that of Katharine Jenkins.<sup>4</sup> She makes Haslanger's picture more complex by adding a second dimension of identity to Haslanger's account of WOMAN as class. However, we think there are more dimensions than class and identity, and we introduce the idea that each dimension will lead to locally reliable applications that ultimately lead to contradictions when extended globally.

We begin (§2) with a brief history of the political use of WOMAN. Radical (white) feminism's break with the New Left in the years 1964-1972 reveals both the promise and the pitfalls of WOMAN as a tool for political organization. In §3, we discuss Haslanger's recent attempts to avoid the problems of previous definitions of WOMAN, and show that while she avoids many of them, she nevertheless holds out hope for a definition of WOMAN which will *settle* border disputes, and do so *prior* to encountering particular political questions. While we take Haslanger's proposal to be the best possible version of such a *monolithic* definition of WOMAN, it nevertheless faces serious difficulties. In §4, we present Wilson's conception of a theory facade – a new philosophy of language which recognizes the complexities inherent in most actually existing concepts, a philosophy which can recognize the multi-valuedness of WOMAN. In §5, we provide some reasons to think that WOMAN forms a theory facade: disputed

questions are not simply vague, not simply disputed, but rather reflect different reasons we might have for extending the concept WOMAN to such cases.<sup>5</sup> We then (§6) consider some political applications of these ideas, including contemporary debates about women's colleges and women's athletic leagues. We conclude (§7) with some more speculative remarks about the implications of these ideas for theorizing and organizing around concepts like WOMAN.

## **2: The politics of identity 1964-1972**

We begin with a case study of the use of the concept WOMAN as a tool for political organizing: the period in America 1964-1972, which covers the split between the New Left and the radical (white) women's movement, and the eventual fragmentation of the women's movement over race, class, and sexuality. We've picked this period because it illustrates both the power and the pitfalls of WOMAN as a political tool – the power, insofar as it enabled activists to identify and resist entrenched patterns of injustice, and the pitfalls, insofar as it led to a fragmentary and exclusionary movement.

By "the New Left," also called "the Movement," we mean the movement centered around Students for a Democratic Society (SDS) and the Student Nonviolent Coordinating Committee (SNCC), formed in response to dissatisfaction with an overly Stalinist Communist left and an overly reformist liberal left. The ideals of the Movement were given expression in SDS's founding document, the Port Huron Statement:

Men have unrealized potential for self-cultivation, self-direction, self-understanding, and creativity. It is this potential that we regard as crucial and to which we appeal, not to the

human potentiality for violence, unreason, and submission to authority. The goal of man and society should be human independence.<sup>6</sup>

The Movement's more immediate goals were opposition to Jim Crow in the South and American imperialism abroad, especially in Vietnam.<sup>7</sup> But their overarching ideal was the liberation of all human beings from structures of injustice and oppression.

Unfortunately, there was something of a mismatch between the Movement's stated goals and its day-to-day reality – especially if you were a white woman. In November 1964, an anonymous report (the authors were quickly identified as Mary King and Casey Hayden)<sup>8</sup> called "Student Nonviolent Coordinating Committee Position Paper: Women in the Movement" was circulated and discussed at an SNCC meeting in Waveland, Mississippi. The paper identified a variety of microaggressions and acts of discrimination against women; the following example gives a sense of the paper:

Two organizers were working together to form a farmers' league. Without asking any questions, the male organizer immediately assigned the clerical work to the female organizer although both had had equal experience in organizing campaigns.<sup>9</sup>

The authors remark that their list of grievances may seem "...strange to some, petty to others, laughable to most," and suggest that just as many whites could not understand why being called "boy" was offensive, so too would men be unable to understand why this pattern of incidents was a problem.<sup>10</sup> They were quickly proven correct: after the meeting, Stokely Carmichael jokingly

asked "What is the position of women in SNCC?" and then answered himself: "The position of women in SNCC is prone!"<sup>11</sup>

The fact that the men of the movement were largely unresponsive to the issue of sexism led to an expanded version of the initial paper ("Sex and Caste: A Kind of Memo") being circulated prior to the 1965 National Council meeting of SDS. The paper itself previews the reception it would receive at the convention:

A very few men seem to feel, when they hear conversations involving these problems, that they have a right to be present and participate in them, since they are so deeply involved. At the same time, very few men can respond non-defensively, since the whole idea is either beyond their comprehension or threatens and exposes them. The usual response is laughter. That inability to see the whole issue as serious, as the straitjacketing of both sexes, and as societally determined often shapes our own response so that we learn to think in their terms about ourselves and to feel silly rather than trust our inner feelings. The problems we're listing here, and what others have said about them, are therefore largely drawn from conversations among women only and that difficulty in establishing dialogue with men is a recurring theme among people we've talked to.<sup>12</sup>

At the convention, a session was held on the memo and women's issues more generally. Sara Evans reports that the men present were defensive and obstructionist; this led to some women attempting to break out into a women-only session, only to be followed by men demanding to be allowed to participate.<sup>13</sup>

Things came to a head in 1967. In June, SDS held their national convention in Ann Arbor; on the program was a Women's Liberation Workshop. After a disputatious meeting, the session issued a programmatic statement on women's liberation, which was published in *New Left Notes* – next to a cartoon of a woman wearing a polka-dot minidress and matching panties, holding a placard saying "We want our rights & we want them NOW!"<sup>14</sup> A second (and even more fractious) convention, the National Conference for New Politics, was held in Chicago in September.<sup>15</sup> The initial women's workshop formed a resolution, but was told by the conference's resolutions chair, William Pepper, to merge it with the Women's Strike for Peace resolution (which was not a feminist but an anti-war resolution); while Madlyn Murray O'Hair did so, the more radical members of the workshop, such as Jo Freeman and Shulamith Firestone, felt the compromise resolution simply "sold out" the original resolution. They therefore drafted their own women's resolution, and presented it to Pepper. But he instead presented O'Hair's compromise resolution as the conference's women's resolution. Freeman and Firestone confronted him, with the following result:

When Shulie reached Pepper, he literally patted her on the head. "Cool down, little girl", he said. "We have more important things to do here than talk about women's problems."<sup>16</sup>

Shortly after, Westside, a group of Chicago feminists, published an article addressed "To the Women of the Left" in *New Left Notes*. They set out their political goals: equal access to education, an end to employment discrimination, widespread availability of birth control and abortion, etc.<sup>17</sup> And they also set out their principles of political organization:

...we sought to apply the principles of justice, equality, mutual respect and dignity which we learned from the Movement to the lives we lived as part of the Movement; only to come up against the solid wall of male chauvinism. ... Women must not make the same mistake the blacks did at first of allowing others... to define our issues, methods, and goals. Only we can and must define the terms of our struggle. ... While we welcome inquiries and assistance from all concerned persons this organization and its sister chapter now forming in New York are open only to women.<sup>18</sup>

With that, radical feminism announced its split from the organizations of the New Left. Within a few years, there was an explosion of radical feminist groups engaged in direct action, consciousness raising, and community organizing, including New York Radical Feminists (and their various sub-brigades), Cell 16, Redstockings, the Women's International Terrorist Conspiracy from Hell (i.e. WITCH), The Furies, and many others, along with a series of new periodicals, such as *The Voice of the Women's Liberation Movement*, *No More Fun and Games*, and *off our backs*.<sup>19</sup>

At the time, there was much excitement about the prospect of a unified women's liberation movement – as Ann Snitow retrospectively put the sentiment, "We are one, we are woman."<sup>20</sup> But it did not last; the movement would rapidly fracture along a variety of dimensions.<sup>21</sup> For instance, racial fractures were with the movement from its very inception. In August 1968, a group of radical feminists from across the east coast met at Sandy Springs with the aim of planning the future direction of their movement. It was suggested that they contact

Kathleen Cleaver, a Black Panther, with the hope of connecting with radical black women. The suggestion was ultimately rejected; as one woman put it:

I don't want to go to a conference and hear a black militant woman tell me she is more oppressed and what am I going to do about it.<sup>22</sup>

This set the pattern for the "women's" liberation movement for years to come. While there were a number of active black feminists at the time, they were largely excluded from the women's liberation movement.

Conflicts over class also dogged the movement; Ti-Grace Atkinson's ouster from The Feminists (a group she founded) is illustrative. Atkinson was a published author, an experienced organizer (she had worked for NOW (the National Organization for Women)), held a BFA and was working on a Ph.D. in philosophy.<sup>23</sup> Unsurprisingly, Atkinson was also the media spokeswoman for the group and its most prominent author. But many working-class women in The Feminists opposed her – her abilities as a writer and a public speaker were due to her upper-class background, they held, and it was unfair that she should perform these more rewarding functions. The Class Workshop, formed to address these issues, forced Atkinson out of the group in April 1970.<sup>24</sup> In May 1970, they presented a proposal, "What We Can Do About the Media," to the second Congress to Unite Women. They wrote that they had formed their group



...because of the exclusion of most working class women from the women's liberation movement... . The feminist movement began because we were tired of being led by men. But neither do we want to be led by women.<sup>25</sup>

Instead, they proposed that the movement be structured on absolutely egalitarian terms – that all roles be assigned by lottery, that no group member could speak in her own name to the media, or publish in her own name, or earn a living by speaking on feminist issues, and that anyone who violated these rules would be punished and ostracized.<sup>26</sup>

Atkinson's story is hardly unique – Shulamith Firestone and Anne Koedt were ousted from New York Radical Feminists; Marilyn Webb was forced out of DC Women's Liberation; Jo Freeman was ostracized by Westside, all largely for the same reasons as Atkinson: translating upper-class privilege into greater power and fame within the movement.<sup>27</sup> What's striking is that in each case, the issue of class was tied up with debates about the nature of women and sisterhood. Barbara Mehrhof, in her "On Class Structure in the Women's Movement," argued that the leaders of the feminist movement had "internalized male values," that they were "thinking and acting on the basis of the male value system."<sup>28</sup> Inequality of any kind was a mark of the male – sisterhood, by contrast, was thought to be radically egalitarian.

Lastly, issues of sexuality also divided the radical feminist movement. Lesbians were often perceived as too male-identified. Atkinson wrote,

Because lesbianism involves role-playing [e.g. "butch/femme" and "mother/daughter"] and, more important, because it is based on the primary assumption of male oppression, that is, sex, lesbianism reinforces the sex class system.<sup>29</sup>

Lesbians were perceived as hypersexual, overly masculine, apt to introduce sexual politics into what some women saw as an escape from the pervasive sexualization of mass culture. Betty Friedan famously remarked that lesbians constituted a "lavender menace" to the feminist movement, and set about purging lesbians from NOW.<sup>30</sup>

Lesbian feminists did not take any of this sitting down. When it became clear that lesbians and lesbian issues had been systematically excluded from the second Congress to Unite Women, a group of New York feminists (later to be known as Radicalesbians) organized the Lavender Menace zap.<sup>31</sup> As the Congress' first session was about to open, they killed the lights, flooded the hall (laughing, screaming, and generally having fun), and presented a manifesto titled "The Woman Identified Woman." In it, they argued that

It is the primacy of women relating to women, of women creating a new consciousness of and with each other, which is at the heart of women's liberation, and the basis for the cultural revolution.<sup>32</sup>

In other words, they sought to recast lesbians as not male-identified but as *even more* female-identified than straight feminists. And they were, to some extent, successful: a wide variety of lesbian-feminist groups emerged after the zap. But this often introduced new fissures – for

instance, in DC, feminist groups fractured over whether the communal day-care center was to raise children as lesbians or merely bisexual.<sup>33</sup> Similar conflicts over sexuality would be with the movement for years.

It is worth noting that in each of the cases we have discussed, questions of race, class, and sexuality were tied up with questions about WOMAN – were black women's issues really women's issues, or would they have "muddied up the issue"?<sup>34</sup> Were women in leadership positions "male-identified"? Were lesbians more or less women than their straight sisters? What initially promised to be a source of resistance to the New Left's "solid wall of male chauvinism" – the idea of women as a group bound together and ready for political action – devolved into internecine fights over the real meaning of WOMAN and WOMAN'S EXPERIENCE. Donna Haraway, looking back at two decades these battles, writes:

Which identities are available to ground such a potent political myth called 'us', and what could motivate enlistment in this collectivity? Painful fragmentation among feminists (not to mention among women) along every possible fault line has made the concept of *woman* elusive, an excuse for the matrix of women's dominations of each other.<sup>35</sup>

This represents the basic difficulty that second-wave feminism failed to resolve. On the one hand, it seems that there really is such a thing as sexism, i.e. discrimination against women, and thus a distinctive set of women's issues. On the other, attempting to articulate a definition of WOMAN which would make sense of that claim led only to fragmentation and exclusion.

### 3: Haslanger on WOMAN

Sally Haslanger has proposed a solution to the difficulties that the concept WOMAN has posed for feminist activism. From the outset, Haslanger characterizes herself as taking an *analytical* approach to answering the question of what WOMAN is. An analytical approach is one in which one defines a concept by asking what purposes we want the concept for, and comes up with a definition that achieves those purposes. In the case of WOMAN, she wants a definition that would serve feminist and antiracist social theory well in the “fight against injustice.”<sup>36</sup>

She identifies the definition she proposes as addressing the following two concerns:

- (i) The need to identify and explain persistent inequalities between females and males... this includes the concern to identify how social forces, often under the guise of biological forces, work to perpetuate such inequalities.
- (ii) The need for a framework that will be sensitive to both the similarities and differences among males and females... this includes the concern to identify the effects of interlocking oppressions, for example, the intersectionality of race, class, and gender.<sup>37</sup>

On the basis of these concerns, Haslanger defines WOMAN as follows:

*S functions as a woman* in context *C* iff<sub>df</sub>

- (i) *S* is observed or imagined in *C* to have certain bodily features presumed to be evidence of a female’s biological role in reproduction;

- (ii) that S has these features marks S within the background ideology of C as someone who ought to occupy certain kinds of social position that are in fact subordinate (and so motivates and justifies S's occupying such a position); and
- (iii) the fact that S satisfies (i) and (ii) plays a role in S's systematic subordination in C, that is, *along some dimension*, S's social position in C is oppressive, and S's satisfying (i) and (ii) plays a role in that dimension of subordination.<sup>38</sup>

Haslanger is keenly aware of how the search for a distinctive "women's consciousness" divided second-wave feminism.<sup>39</sup> Thus her definition is resolutely antipsychological: whether a person is a woman has nothing to do with how she subjectively experiences the world, and everything to do with how the world treats her. Moreover, it does not specify a single *phenomenon* that is oppression of women; rather, it recognizes that injustice against women acquires different aspects in different cases – that being oppressed as a *white* woman and as a *black* woman are distinctly different things. Haslanger's hope is that this definition will enable us to *identify* the systematic injustices women face, and thereby provide contemporary feminism with a *cause*, a *goal* we can rally around: to be against sexism.<sup>40</sup>

We support Haslanger's analytical approach towards defining WOMAN. However, we believe that Haslanger's definition, while serving some sociopolitical purposes well, neglects others as a consequence.<sup>41</sup> Indeed, we think that this is an inevitable problem with any monolithic definition of WOMAN, or indeed with monolithic definitions of any macroscopic property<sup>42</sup> – such a definition is bound to serve only some of our purposes while sacrificing others.

Here are some<sup>43</sup> issues that a definition of WOMAN might help to resolve in the fight against social injustice:

1. Determining what category of people the group is fighting for.
2. Determining who gets to participate in the activist group's events.
3. Determining who gets to participate in the governance of the group.
4. Determining who has practical authority on a (particular) gender-related issue.
5. Determining who has epistemic authority on a (particular) gender-related issue.
6. Contributing to an explanation of structural or institutional injustice.
7. Determining the language in which legislative reform will be presented.
8. Determining the language with which to argue cases in court defending people being oppressed on gender-related issues.

It is our view that neither Haslanger's definition of WOMAN, nor indeed any monolithic definition of the concept, can answer all these questions in ways that we will find helpful in the fight against injustice. Jenkins has pointed out some of the problems with Haslanger's definition.<sup>44</sup> Jenkins suggests adding to Haslanger's definition an identity aspect of gender, which would include trans women whom Haslanger's definition excludes. While we applaud this move towards including trans women, we think there are more facets to WOMAN than the ones Haslanger and Jenkins suggest. Furthermore, we think that our theory facade view will illuminate not just this multiplicity, but also the fact that each facet of WOMAN is locally reliable in application but not always globally consistent with either other facets or a natural extension of

itself. In the theory facade account, this local-global tension is an inevitable outcome of how natural language evolves.

We now proceed (§4) to develop Wilson's conception of a theory facade: a way of making sense of the complex system of purposes any concept of significant practical use is put to. We then (§5) offer some reasons for thinking that WOMAN has this structure, and then (§6) explain why our suggested definition of WOMAN is a better definition for analytical purposes – for the purpose of fighting social injustice.

#### **4: Theory facades**

We propose that rather than adopting a monolithic definition of WOMAN in the fight against social injustice, we recognize the complexities inherent within the concept of WOMAN by viewing it as what Wilson calls a "theory facade."<sup>45</sup> Wilson argues that many ordinary concepts, such as HARDNESS and WEIGHT, have a complicated structure of connected, overlapping *patches*, formed as a result of the historical evolution of different strands within the concepts. This account of theory facades was developed explicitly out of a critique of monolithic definitions of concepts. Instead of having monolithic definitions, our concepts contain many patches. Each patch licenses methods of applying the concept in a local context, which may not apply globally. However, the domains of application of disparate patches can overlap. Furthermore, the different patches are not completely unrelated – often, new patches arise because of issues in applying other patches in certain domains.

Wilson takes HARDNESS to be a paradigm example of a concept that forms a theory facade. Hardness may seem like a simple property directly accessible to our senses, but it is less unified in its domains than it may seem. This disunity can be seen in how we check for hardness in everyday life: should the hardness of a material be adjudicated by us scratching, squeezing, indenting, or rapping it? As Wilson points out, even in engineering contexts there is no unified definition of HARDNESS. Candidate definitions in various areas of engineering include resistance to indentation, flow stress, resistance to wear, resistance to scratching, and resistance to cutting. The result is that

...our employment of “hardness” silently distributes itself into a patchwork of sheets, locally distinguished by a certain vein of probing (scratching, tapping, etc.) that sit over various varieties of material stuffs and continue smoothly into one another.<sup>46</sup>

Figure 1 represents the structure of the concept HARDNESS. Each sheet represents some kind of uniform way of evaluating the hardness of a material, while the physical overlapping of the patches represents the fact that the different criteria for hardness coincide for some materials. This is what Wilson means by the claim that the criteria “continue smoothly into one another”.



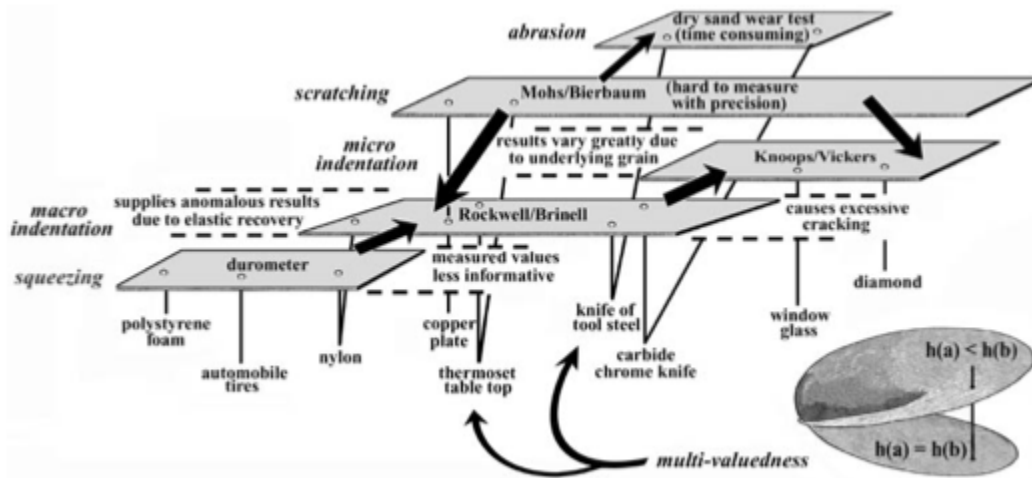


Figure 1: The conceptual structure of hardness.<sup>47</sup>

To give a better idea of what he means by “continue smoothly”, a notion which is central to the idea of patches being *extended* to new domains, we can look to an example from mathematics. Some time ago, mathematicians began exploring a new sort of number: imaginary numbers, the most famous of which is  $i$ , the square root of negative one. In particular, mathematicians began extending apparently well-understood functions, like the natural logarithm function, from the real numbers to the complex numbers (all those numbers of the form  $x+iy$ ). But as they extended these functions into this new domain, they encountered some interesting difficulties. While they were able to smoothly extend these functions step-by-step via the process of *analytic prolongation*,<sup>48</sup> when this process "circled around" back to the real numbers, it returned *new answers* to questions like "What is the natural logarithm of 1?" This turned out to be not a bug but a feature: the process of prolonging these mathematical concepts revealed in them a *multi-valuedness* that had previously been concealed.<sup>49</sup> That is, both of the following

claims are true: "The natural logarithm of 1 is 0" and "The natural logarithm of 1 is  $2i\pi$ ." Such a multi-valued function is said to form a *Riemann surface*, a structure such that, while each patch of the surface continues smoothly into the next, the surface as a whole eventually becomes multi-valued as it loops back around on itself. This multi-valuedness is an interesting, unavoidable feature of the natural logarithm function, even in the real domain. Prolongation revealed the hidden complexity of a concept we thought we understood.

Wilson takes this notion of prolongation leading to multi-valuedness to be a general phenomenon in conceptual development, applying to non-mathematical concepts as well. One example is the concept of WEIGHT. Extending our GRAVITATIONAL FORCE notion of weight to the case of an astronaut orbiting around earth, it's clear that the astronaut does experience a gravitational force, since without it, there would be no centripetal acceleration, and it is the latter that constitutes orbital motion. Thus, the astronaut is not weightless in the GRAVITATIONAL FORCE sense. However, it is also often said that the astronaut is weightless in orbit, because the astronaut experiences no "force" pulling her to the "bottom" of the spaceship. This conflict is a result of extending our GRAVITATIONAL FORCE notion of weight and our BEING PULLED DOWN TO SOME SURFACE notion of weight from the initial domain of the surface of the earth, where both notions coincide, to the domain of a spaceship in orbit, where they fail to coincide and lead to a certain multi-valuedness in the concept WEIGHT. This is analogous to how analytic prolongation of complex functions can lead to them being multi-valued.

We can contrast the facade conception of concepts with traditional philosophical tools like VAGUE and CLUSTER CONCEPT. These conceptions also eschew simple lists of necessary and sufficient conditions which would settle any contested case. And all of them have been

employed in conceptions of WOMAN. In what follows, we critique their application to both scientific concepts like HARDNESS and social-political concepts like WOMAN.

Consider VAGUE. VAGUE offers a continuum with "the concept definitely applies" at one pole and "the concept definitely does not apply" at the other; in between is a spectrum of "the concept more or less applies." We can illustrate this graphically:

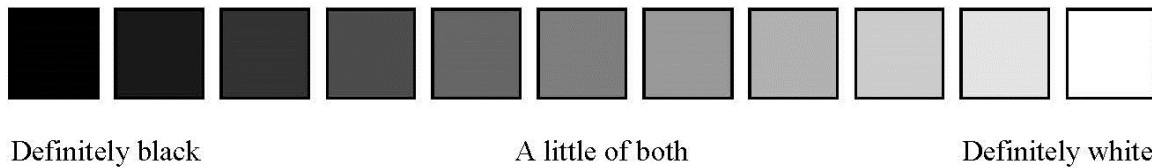


Figure 2: A traditional conception of VAGUENESS

The case above involves a simple metric – "how dark is the square" – which works well enough for concepts like BALD and WET. But it can be extended to more complex concepts involving multiple features; whether the concept applies then depends on something like a weighted average of those features, or perhaps how closely the case resembles paradigm cases; this extension of VAGUENESS is sometimes called CLUSTER CONCEPT. But it is clearly inadequate when applied to concepts like HARDNESS. When trying to determine the hardness of a sample of vulcanized rubber, you should not apply every single test of hardness, then take some weighted average of the results. Rather, you should apply the test of hardness relevant to rubber (a durometer), and rely on those results. A similar point applies to Natalie Stoljar's account of WOMAN. Stoljar holds that "there are four general elements in the concept "woman.""<sup>51</sup> They are a) female sex, b) a woman's characteristic phenomenology, c) feminine social roles, and d)

self-identification as a woman.<sup>52</sup> Our objection to this account is that when considering whether a person is a woman, one should not take some weighted average of some hypothesized<sup>53</sup> set of criteria of womanhood but rather apply the criteria that are relevant to the purposes at hand. As we will argue later, WOMAN's contested cases are not simply vague (as it is simply vague whether the second square from the left is black or gray), but rather reflect *different but equally valid* ways of prolonging WOMAN into new domains.

Given these objections, a perhaps more promising approach is taken by Cressida Heyes and Linda Nicholson. Heyes and Nicholson each, in their own way, advocate a Wittgenstein-inspired feminism, on which there is no monolithic definition of WOMAN, but only a variety of strands, some of which are salient in some contexts and some in others.<sup>54</sup> For example, a person's chromosomes might be *irrelevant* in one context (e.g. a social one), and nevertheless very relevant in another (e.g. a medical context), whereas on Stoljar's view, each feature of WOMAN has some weight in every context. Because of this essential context-dependence, we call this kind of view "contextualist."

There are two linked features of this account that we find troubling: first, that the notion of salience is not adequately spelled out and seems to have some connection to intuition; second, that it involves a relatively *static* view of language. These problems are serious enough when applied to concepts like HARDNESS; worse, they suggest rather conservative views of more charged concepts like WOMAN.

First, consider the notion SALIENCE. One problem is that neither Heyes nor Nicholson explicate clearly their notion of salience. Heyes invokes Wittgenstein's injunction to "look and see" as the basis for her account of how feminist practice should guide how we define WOMAN in

theory. However, her narrative of her experience in feminist practice does not offer general criteria for what would count as salient.<sup>55</sup> Nicholson reiterates Wittgenstein's family resemblance account of GAME without offering an account of how to decide which strand of GAME is salient.<sup>56</sup> If left unexplicated, one might think that SALIENCE refers to the individual speaker's intuitions or perceptions of "what matters" in a given instance. More strongly, it might refer to the competent language user's well-developed but largely unarticulated sense of how to apply a given term in a given context. Again, we can contrast this with Wilson's account: there is no reason to expect that a competent English speaker (such as you or I) would know a thing about whether to apply a Knoop or a Rockwell test to a given sample of steel. Our *linguistic* intuitions won't help us here.

Second, consider the basically static picture of language contextualism leaves us with. To paraphrase Wittgenstein, children have their hands pressed against a variety of hard things, and are told to "go on as before." But there comes a point where our extant understanding of terms *gives out*. And the process of *prolonging* the concept into a new domain involves both the practical problems that require us to do so as well as the pushback, the friction, that the world gives us as we do so. Wilson's account offers us a richer picture of what happens when we try to prolong concepts that Wittgenstein's account lacks, which is consistent with how WOMAN has evolved in response to our changing understanding of gender, sexuality, and biology.

These problems are more dramatic when it comes to *politically* charged concepts like WOMAN. Put bluntly, what response does the contextualist have to the bigot who insists "I find the fact that you are chromosomally XY to be salient, so you are not a woman, you fucking she-male" – or for that matter, one who insists that traditional feminine norms are an essential part of

the concept?<sup>57</sup> And of course the contextualist might insist that the bigot's picture of WOMAN is not salient in *our* context, but this just generates further problems. Let us say that you and I are on the admissions committee at Wellesley, and that relative to my context, a given applicant is a woman, while relative to yours the applicant is not. This hardly answers the question of whether this applicant is coming to Wellesley next year!

By contrast, we think that a combination of Wilson's philosophy of language and Haslanger's analytic project is far better equipped to solve these sorts of practical problems. Nothing we were taught as children about men and women equipped us to determine whether androgen-insensitive females should compete in women's athletic leagues. Rather, to answer that question, we need to attend to both our purposes in having such leagues and the particular biological and social facts about such women. And of course these purposes are themselves subject to ethical scrutiny: unjust purposes do not make for profitable prolongations.

The general philosophical lesson we would like to draw from all this is that concepts that appear to work fine in a limited domain can lead to strange phenomena like multi-valuedness when extended in a seemingly natural way to new domains. We would like to argue that the same thing happens with the concept of WOMAN. The problem with monolithic definitions of WOMAN is that they resolve this multi-valuedness by fiat, by privileging one strand of the concept over others. We argue that for the purposes of combating injustice, we ought to keep all strands of the concept in mind. In §5, we tease out the multiple strands of meaning that make up the concept WOMAN and show how their extension over time and multi-valuedness led to splits in the feminist movement. Then, in §6, we argue that the solution to this problem is to adopt an

inclusive account of WOMAN as a theory facade. This conception is a more useful tool for feminist movements than any monolithic definition.

### **5: Women are a Riemann surface**

You look out your window, see a person walking by. "That's a woman," you say. You keep on watching the passersby, sorting them into women and men. But this is boring and unbefitting a philosopher; you want to extend your ideas, provide a *definition* or *account* of WOMAN that will do a better job explaining the concept that just saying "I look out my window and I know." The women you've seen dress differently, act differently, look differently – but they all do seem to share some gross physical similarities. "Secondary sex characteristics!" you realize. So now you go about prolonging your concept of WOMAN using the PHYSICAL SIMILARITY patch..

All goes well, for a while, but soon enough you run into some problem cases – women who have had mastectomies, or were in a fire, or just happen to have narrow hips and broad shoulders. So you say "We should look to the *underlying cause* of gross morphology: DNA, genes, chromosomes. WOMAN = XX." Well enough – but now let's return to that woman you first saw walking by. Suddenly she's not a woman anymore: as she has androgen insensitivity syndrome, she is morphologically female despite being chromosomally XY. In other words: a natural prolongation into the PHYSICAL SIMILARITY patch yields a conflicting answer when you finally wend your way back to the base case.<sup>58</sup>

So you start over. "Forget this reduction to the base biological," you say, "gender is in the head. This woman experiences the world in a characteristic way. She's treated like a woman,

and that leaves her with a particular consciousness." And so you start prolonging WOMAN to those people who share her experiences. But of course this rapidly runs into problems: this woman's experience is dramatically different from that of, say, a white American woman. So you say, "Let's abstract from the particular experiences these women have had: What unites them all is that they *identify* as women – their shared experience is simply their consciousness of themselves as women."<sup>59</sup> Yet when you return to your original woman, it turns out that he's a man. Ask him "Are you a woman" and he'll tell you "No, I'm just a man who's too broke to afford testosterone."<sup>60</sup> Again, a natural prolongation into the PSYCHOLOGICAL SIMILARITY patch yields a conflicting answer in our original case.

Now consider Haslanger's definition based on oppression via perceived sex. If we extend this in one direction, we find that it includes trans women who are perceived to have "bodily features presumed to be evidence of a female's biological role in reproduction"– that is, trans women who "pass". However, it fails to include trans women, even "post-transition" trans women, who fail to pass. Yet this group of trans women is arguably more oppressed than the group who pass, and arguably, they are oppressed based on the fact that they *do* possess bodily features that are associated with a female's role in biological reproduction. However, if we extend Haslanger's definition to include trans women who sometimes fail to pass by including those who are oppressed based on any female-associated physical features, we end up including effeminate men, who experience bullying based on the fact that they possess some physical features normally associated with females. And given that effeminacy exists along a spectrum, this allows many less-than-fully-masculine men to count as women. However, extending Haslanger's definition straightforwardly in another direction, these men enjoy privileges based



on being perceived to be men (albeit effeminate men), so they should not be considered to be women. Thus the same group of people, effeminate men, come to be classified in contradictory ways – Haslanger’s definition, analytically prolonged, leads to the result that MAN is a multi-valued concept.

These examples support our proposal that WOMAN has a theory facade structure.<sup>61</sup> Specifically, the concept contains different patches of meaning that are each applicable in some local context, but when we try and extend these patches to a wider domain, they may come into conflict, *a la* a Riemann surface.

Among the candidate patches of meaning going into the concept WOMAN are the following:

1. Gender identity conceived as a psychological state. In this patch of the concept, one can identify oneself as a particular gender (transbutch, genderqueer, etc.) independently of biology or how one is perceived by others.
2. Gender conceived as relative oppression. This is a more simplistic precursor to Haslanger’s definition.
3. Physical gender presentation (makeup, clothes, scent, voice, body language).
4. Gender as marked according to social roles other than relative level of oppression. For example, one could take on certain masculine-coded or feminine-coded roles.
5. Gender as having the appropriate “functioning” sexual organs. While this definition may seem archaic, it is still used as a basis for excluding trans women from women-only events.<sup>62</sup>

This list is non-exclusive, as we expect that new patches of meaning are evolving or will evolve. Each of these patches has the potential to be naturally extended in a way that results in contradictions if we take it to be the only patch to capture the concept WOMAN.<sup>63</sup>

These different patches of meaning embedded within the ordinary concept of WOMAN have contributed to the splitting of feminist movements. Splits occurred both due to conflicts brought about by natural extensions of the same patch of meaning, and due to conflicts as to which patches should be privileged. As detailed in the introduction, feminist movements have split over the role of more economically privileged women in the movement, who were regarded as too “male” in virtue of having privilege. This demonstrates the role of patch (2) in splitting movements: if women are to be identified via relative lack of privilege, then it makes sense that upper class women are “more like men”. As discussed earlier (§2), lesbians were excluded from some feminist movements for being too “male-identified,” too “manly.” This shows how patch (4) contributed to splitting movements. Patch (3) has contributed to attempts to excise lesbians from feminist movements. One could also view the incidents of feminist movements insisting that they are lesbian-only as a kind of cultural feminism – the thought behind these incidents was that one could not live a lifestyle in which one “collaborated with the oppressor” (men) and still be a real woman.

In modern transgender movements, patch (1) has been emphasized in bids to get institutions to recognize the preferred gender of transgender people. By taking gender to be a kind of internal psychological identity, activists aimed to skirt questions and assumptions about the sex, social role, sexual identity, and other aspects of a transgender person that might lead

institutions to force them to use their dispreferred bathroom, deny them medical treatment, and so on. However, there has been pushback against (1) from some feminists, who are reluctant to regard pre-transition trans women, for example, as genuine women, precisely because they think pre-transition trans women have not really experienced sexism in a way to be considered psychological sisters-in-arms.<sup>64</sup>

The fact that both inter-dimensional and intra-dimensional conflicts in the concept of WOMAN have led to movements splitting can be seen as a manifestation of its inherent multi-valuedness. The dimension that less economically privileged women saw as important to the concept WOMAN, that of being relatively more oppressed, was extended to the point that economically privileged female-bodied people were regarded as no longer women. This, however, conflicted with other dimensions which referenced lifestyle, gender expression, sex, and so on. There were women who privileged some of these other dimensions – those who did not want the movement to split along class lines. Thus, just as happened with the Riemann surface, extending the concept WOMAN in one direction, that of relative oppression, led to a multi-valuedness in the concept, in which different dimensions produced different answers within the domain of economically privileged, female-bodied people.

## **6: Riemann's politics**

So far we have made the descriptive case that gender as is used conventionally has many dimensions to it, which together form a theory facade structure. But what about the normative case? Why *should* feminist movements take gender to be a theory facade? We will consider two contemporary applications of WOMAN: debates about who can attend women's colleges and

questions about women's athletic leagues. Both of these cases are central to any analytical<sup>65</sup> definition of WOMAN. In each case, it will become clear that the multi-valuedness of WOMAN should not be resolved by coming up with a monolithic definition that all feminist movements should follow. Rather, the question of which dimensions of WOMAN matter, and when a certain extension of WOMAN in a certain dimension should be truncated, depends on the context of application.<sup>66</sup>

In 2014 and '15, Mt. Holyoke College and Smith College, in response to years of campaigning by trans activists and allies, amended their admissions policies to be more inclusive. Mt. Holyoke now admits anyone who either identifies as a woman or was born female, while Smith admits anyone who identifies as a woman.<sup>67</sup> Both colleges framed these changes as consistent with their remaining women's colleges. Yet consider: according to Haslanger's definition of WOMAN, both Mt. Holyoke and Smith are making a mistake. Mt. Holyoke is admitting men (in particular, trans men who have transitioned), as is Smith (trans women who have not transitioned).<sup>68</sup> And this is not a quirk of Haslanger's definition: given any monolithic definition of WOMAN, it cannot be true that both Smith and Mt. Holyoke have correct admissions policies.

So how would our conception of WOMAN apply to these cases? How do its *practical applications* differ from monolithic conceptions? Let's look at Smith's stated reason for not including trans men:

The mission of Smith College is to educate women of promise for lives of distinction. In the years since Smith's founding, concepts of female identity have evolved. Smith

alumnae have been leaders in the movement to afford women greater freedoms of aspiration and self-expression. At the same time, educational settings in which women are central remain powerfully transformative.<sup>69</sup>

These remarks appeal to the idea that there are distinct educational benefits for women of all-women educational environments – an idea which is borne out by a variety of studies.<sup>70</sup> If this is one of the central goals of Smith as a women's college, then this indicates that the *practically relevant* patch of the Riemann surface that is WOMAN is not biological but social. To appear, to act, to pass as a woman is, in the relevant respect, to be a woman. We can contrast this with Mt. Holyoke's reasons for including female-assigned-at-birth students:

Just as early feminists argued that the reduction of women to their biological functions was a foundation for women's oppression, we must acknowledge that gender identity is not reducible to the body. Instead, we must look at identity in terms of the external context in which the individual is situated. It is this positionality that biological and transwomen share, and it is this positionality that is relevant when women's colleges open their gates for those aspiring to live, learn, and thrive within a community of women.<sup>71</sup>

The concept POSITIONALITY is derived from anthropology, where it initially referred to field anthropologists' recognition of the ways that data collection and interpretation were influenced by characteristics of the researcher such as race, gender, class, etc. Mt. Holyoke therefore seems

to be appealing to the idea that women (including cis women, trans women, and trans men) are treated in similar ways by society. If the implication is that they therefore have similar subjective perspectives, then that seems problematic; as we discussed earlier, the idea that there is a universal "women's experience" is false. On the other hand, Mt. Holyoke may be suggesting that women (so defined) have suffered (or will suffer) (or were / will be at risk of suffering) injustice because they were perceived or imagined to be female. If that is the case, then Mt. Holyoke is putting itself forward as both a refuge from and a remedy for this injustice.<sup>72</sup>

Unlike any monolithic conception of WOMAN, our conception reveals that both Smith and Mt. Holyoke engaged in *good reasoning*. Neither of them is correct if they are attempting to offer some universal definition of WOMAN – but each makes sense given the particular practical purposes the concept is being put to (both of which we hold to be good).<sup>73</sup> In contrast, Haslanger has to say that both colleges are enacting bad policies based, ultimately, on conceptual confusion. Our conception of WOMAN also suggests a program for *understanding and extending* these policies when new difficulties emerge. Consider Smith's policy. If their rationale is to provide the unique benefits of an all-woman educational environment, then the goodness of a new prolongation of WOMAN is *testable*: study the nature and outcomes of the educational environments that result from the inclusion of particular groups of people. So when future questions arise, we don't need to consult our "a priori" intuitions about what a woman is; rather, we can work out how to extend the concept in determinate ways given certain purposes.

Moreover, none of this means that "anything goes" when it comes to setting policy. Consider a fictional women's college, the Michigan Women's College. Michigan has a policy of admitting only women who were female-assigned at birth (FAAB). This is a medically-oriented

patch of WOMAN, but it's unclear that it has any relevance to Michigan's educational mission. A wide variety of people are FAAB, including trans men who never undergo female puberty (i.e. take hormone suppressants until they transition to male as legal adults) and intersex individuals who identify as men. Conversely, the FAAB concept excludes e.g. intersex women who were not FAAB but identified as female from a young age. Since the class of people who were FAAB seem to have no common psychological, social, or physical features, it's not clear what educational purpose is served by including only FAAB women and excluding all others. Thus, on our view, Michigan's admissions policy rests on ethically dubious grounds (and perhaps factually dubious grounds as well, i.e. the insistence that being FAAB produces a characteristic "woman's consciousness"). A monolithic conception of WOMAN, on the other hand, would have to hold that Michigan is *conceptually* confused. The appropriate response is not ethical or factual criticism, but education about what WOMAN really means. We hold that this is a mistake: FAAB is a patch of the concept WOMAN, but since it is not one that is *practically relevant* to Michigan, it constitutes an ethical mistake for Michigan to rely on it.

Next, consider women's athletic leagues. In particular, consider the case of Fallon Fox, a woman who came out as trans after competing in several mixed martial arts (MMA) matches.<sup>74</sup> Her case generated significant controversy in the MMA community, as some commentators and competitors argued that, having grown up as a man, Fox had an unfair physical advantage when competing with fighters who had not. For example, Ronda Rousey, a well-known Ultimate Fighting Championship competitor, stated that Fox should not compete in the women's division, because

I feel like if you already go through puberty as a man it's something that you can't really reverse, but there are people that are identified as being a male-identified woman or a woman-identified man early on, and they're put on hormone suppressant therapy until they're of legal age, and then they can make the decision to get the sex change later, and I think that would be acceptable, that would be fine, because they wouldn't already have developed the bone structure of a man, the muscular structure. You can't just reverse that – there's no undo button on that.<sup>75</sup>

Fox responded, but not by arguing that, because she identifies as a woman, she is a woman and therefore eligible to compete in women's leagues. Nor did she point to the fact that she passes socially as a woman. Rather, she argued that in the physically relevant respects, she is a woman:

In my opinion, from what I've seen and heard, and what I highlight in the video, is that he [Joe Rogan, an MMA commentator] started off with bone density, muscle strength, hand size, and bone mechanics. Now it appears he is back pedalling to the reality that bone density actually does decrease, and that muscle mass decreases [due to hormone therapy]. I haven't heard much from him about my particular hand size after I released a video on my social media comparing my hand size to another female fighter.<sup>76</sup>

In other words: all reasonable<sup>77</sup> parties to the debate agree that the purpose of women's leagues in MMA is analogous to that of a weight class: it provides a roughly level playing field to the competitors.<sup>78</sup> Given that, the relevant patch of WOMAN is physical, not psychological or social.



Our conception of WOMAN makes sense of the debate between Fox and her interlocutors: they are asking the right questions.

Contrast this with how Haslanger's definition of WOMAN would apply to the case. Since Fox passes as a woman, and (given the society we live in) is presumably subordinated because of that, it follows that she is a woman in Haslanger's sense. So she should be allowed to compete in the women's league – regardless of whether or not her history affords her a distinct advantage in MMA. But this seems wrong; Haslanger's definition requires us to be blind to the relevant facts. And indeed, any monolithic definition of WOMAN would show signs of strain here. As the example of women's colleges showed, we sometimes want a definition that emphasizes the social and psychological aspects of being a woman. But such a definition seems to give the wrong results when applied to women's athletics – and of course a monolithic definition tailored to the physical patch of WOMAN would give strange results when applied to women's colleges. By instead recognizing the facade structure of WOMAN, we can usefully deploy the concept by attending to the practically relevant patches of the facade.

### **7: How to think about WOMAN**

While different practical goals might call for different meanings of WOMAN, we want this to happen without feminist movements splitting into the dreaded “coalitions of one”. By acknowledging that the concept of WOMAN is made up of different patches of meaning that can be extended in many directions, we provide an inclusive platform for organizing feminist movements without favouring one patch over another. Each patch should be deployed according to the practical goal it is best for, and no patch is going to be the best for all the goals that

feminists hope for. Cases where the multi-valued nature of WOMAN is apparent, such as people with androgen insensitivity syndrome, ought not to have their complexity washed away by being classified as woman/not woman by some monolithic definition. Rather, the complex nature of such cases should be acknowledged. The questions of whether androgen-insensitive people should attend women's colleges, whether they should participate in Take Back The Night marches, and whether they should play in women's athletic leagues need not all be answered the same way.

In offering this account of WOMAN, it is not our intent to solve all festering boundary disputes. Rather, the point is to acknowledge the multiple considerations, the multiple overlapping patches of a theory facade, that make boundary cases boundary cases. By recognizing this multiplicity of considerations, each of which may be helpful in their own restricted contexts, the pitfalls of resolving all of them with one uniform definition of WOMAN become clear. Boundary cases are boundary cases because the question of which side of the divide they fall on is purpose-relative. Even within the general purpose of fighting social injustice, there exist many sub-purposes that call for emphases on different patches of the theory facade of WOMAN. To avoid the "coalition of one" problem, an inclusive feminist movement should acknowledge this diversity of purposes within the movement.

The idea of using an umbrella term with no essence for activist purposes is not new. The concept TRANSGENDER is one example. Originally coined to describe men who cross-dress full-time but who have no desire to be rid of their male anatomy, it is now used as an umbrella term to include transsexuals, transvestites, crossdressers, genderqueer people, and possibly intersex people.<sup>79</sup> What these people have in common is an interest in removing social and legal

restrictions on gender expression --- an interest that is shared with many cisgendered persons. However, there is no biological or social commonality between them. It is not even accurate that they are the ones who subvert the gender binary – many trans individuals do not see themselves as subverting the gender binary.<sup>80</sup>

A final, speculative note. In this paper, we have focused on exactly one concept: WOMAN. It is more usual to focus on a linked set of concepts – WOMAN and MAN, or SEX and GENDER. For instance, Haslanger constructs a definition of MAN parallel to that of WOMAN – a man is a person who is privileged because he is imagined to be male.<sup>81</sup> And she situates her analysis of MAN and WOMAN in a more general conception of GENDER: gender is the social meaning of sex.<sup>82</sup> But our reflections on the facade structure of WOMAN suggest that MAN cannot simply be the mirror image of WOMAN, that there is no simple dichotomy between SEX and GENDER. For instance, the ways in which WOMAN can be prolonged along the dimension of physical similarity simply won't map neatly onto the ways MAN can be prolonged along that dimension – human biology is not such a simple landscape.<sup>83</sup> Thus, theorizing WOMAN and MAN – and BUTCH and FEMME and TRANS and GENDERFUCK and so on – are all *simply different tasks*. And it is our hypothesis that in each case, reflection on the ways these concepts are prolonged into new contexts will reveal Riemannic variations.

Thus, while we favor an analytical (in Haslanger's sense) account of such concepts, our analytical account is a patchwork of *locally analytical* definitions, rather than Haslanger's globally analytical definition. Rather than denying the complexity of the world – and our ways of making sense of it – we should recognize that these can all be useful concepts, yet concepts which are not susceptible to monolithic definitions, definitions which will settle any possible

case one way or the other. Rather, extending these concepts – living with them, using them, amending them – requires attention to the practical purposes for which we deploy them.

---

<sup>1</sup> We use small caps to refer to concepts here and throughout the paper. For instance, red is a color, "red" is a word, and RED is a concept. We will also occasionally use "scare" quotes, though we don't offer a theory of when they are appropriate.

<sup>2</sup> Haslanger 2000, pp. 223, 366.

<sup>3</sup> Heyes 2000, Nicholson 1994.

<sup>4</sup> Jenkins 2016.

<sup>5</sup> One proposal we won't consider in detail is the *eliminativist* one, which suggests doing away with the concept WOMAN altogether, and replacing it with better-understood concepts like IS CHROMOSOMALLY FEMALE, HAS A FEMALE GENDER IDENTITY, etc. Our basic response is that WOMAN has historically been a concept that many want to hang on to, both for political purposes and for their own self-understanding. We simply want to present the best way of understanding this concept, on the assumption that one wishes to hang on to it. (Later (n. 50), with some more theoretical machinery in place, we'll suggest some problems for the eliminativist proposal.)

<sup>6</sup> Students for a Democratic Society 1962.

<sup>7</sup> Students for a Democratic Society 1962.

<sup>8</sup> Echols 1989 p. 30.

<sup>9</sup> Anonymous 1964.

<sup>10</sup> Anonymous 1964.

<sup>11</sup> Echols 1989 p. 31, reporting an interview with King. According to King, Carmichael was attempting to parody his own attitudes on the subject.

<sup>12</sup> Hayden and King 1965.

<sup>13</sup> Echols 1989 p. 34.

<sup>14</sup> Students for a Democratic Society 1967a p. 4.

<sup>15</sup> Echols 1989 pp. 47-49.

<sup>16</sup> Freeman 1995.

<sup>17</sup> Students for a Democratic Society 1967b p. 2.

<sup>18</sup> Students for a Democratic Society 1967b p. 2.

<sup>19</sup> Echols 1989 pp. 387-389.

<sup>20</sup> Echols 1989 p. 203.

<sup>21</sup> This is not to discount the effects of state suppression which exacerbated the various internal conflicts in these groups.

<sup>22</sup> Echols 1989 p. 105.

<sup>23</sup> Echols 1989 p. 167.

<sup>24</sup> Echols 1989 pp. 180-181.

<sup>25</sup> Class Workshop 1970.

<sup>26</sup> Class Workshop 1970.

<sup>27</sup> Faludi 2013. Jo Freeman's (also known as Joreen) account of what it was like to be on the receiving end of this treatment is illustrative of the general phenomenon. She remarks "What made the attacks on all of us so debilitating was the pervasive ideology of sisterhood. Because all women were supposed to be sisters, isolation and censure were particularly harsh, just as rejection by family is more painful than by roommates, colleagues or friends, let alone strangers" (Freeman 1995).

<sup>28</sup> Mehrhof 1970 p. 107

<sup>29</sup> Atkinson 1970 p. 86. She later altered her position on lesbians; see Atkinson 1972.

<sup>30</sup> Rita Mae Brown recounts her experiences as an out lesbian in NOW, including the purging of lesbians, in Brown 1972 pp. 189ff.

<sup>31</sup> Jay 1999 p. 143.

<sup>32</sup> Radicalesbians 1970 p. 4.

<sup>33</sup> Echols 1989 pp. 220-228.

<sup>34</sup> The phrase from an anonymous woman speaking at the Sandy Springs conference, quoted in Echols 1989 p. 107.

<sup>35</sup> Haraway 1991 p. 155.

<sup>36</sup> Haslanger 2000 p. 226.

<sup>37</sup> Haslanger 2000 pp. 226-227.

<sup>38</sup> Haslanger 2000 p. 235.

<sup>39</sup> Haslanger 2000 pp. 228-229, 239.

<sup>40</sup> One line of thought which like Haslanger is inspired by some of the difficulties faced by second-wave feminism which we do not address in detail is the idea that WOMAN is a social role. Ron Mallon and Theodore Bach (Mallon 2007, Bach 2012) each pursue the idea that gender is a stable social role, somewhat analogous to a biological species: that a social role includes a cluster of properties, that bearing these properties is mutually reinforcing; that these roles have some social function and are replicated more-or-less reliably over time. Mallon seems to identify gender concepts with the current state of the role, while Bach identifies them with historical lineages of such roles. In our view – and perhaps Mallon's as well (cf. Mallon 2007 p. 149 n. 11,

---

p. 164 n. 58, and p. 165 n. 61) – even if the concept of a social role can be made sufficiently precise (and this is a big if – there are crucial differences between biological and social reproduction that make an analogy between species and social roles somewhat tendentious) it is not a *politically useful* concept in all contexts, as our discussion in §6 will show. In some contexts, we will want to emphasize the social aspects of WOMAN, while in others, the more physical aspects of the concept will be central.

<sup>41</sup> We should note that Haslanger holds that her conception of WOMAN is meant to be part of a *focal analysis* of the concept (2000 p. 228). A focal analysis, rather than providing a single definition of a concept across contexts, holds instead that there is a central meaning of the concept – a focus – but also a variety of other meanings which should be understood in terms of their relation to that focus. So Haslanger is not committed to the idea that her analysis of WOMAN should be relied on in every case. However, we reject even this more moderate stance: there is no paradigm idea of WOMAN in terms of which all others ought to be understood. As we will argue later, there's no need to settle whether the "focal" aspect of WOMAN is physical, psychological, or social: all of these are parts of the concept, to be applied in the relevant contexts.

<sup>42</sup> Wilson (2006, p. 130, 386, 452, 602) argues that a theory facade structure is to be expected of macroscopic predicates in general.

<sup>43</sup> And there are of course many others. Our conception of WOMAN does not depend on a specific list of applications, but is amenable to there being many possible practical reasons for deploying this concept.

<sup>44</sup> Jenkins 2016.

---

<sup>45</sup> Wilson's use of the term derives from old Hollywood movies, in which "...fantastic sets were constructed that resembled Babylon in all its ancient glory on screen, but, in sober reality, consisted of nothing but pasteboard cutouts arranged to appear, from the camera's chosen angle, like an integral metropolis," (Wilson 2006 p. 183).

<sup>46</sup> Wilson 2006 p. 338

<sup>47</sup> From Wilson 2006 p. 338.

<sup>48</sup> This is also known as "analytic continuation." "Analytic" here is a purely mathematical term, unrelated to what Haslanger calls an analytic approach to defining WOMAN. The mathematical process of analytic prolongation is somewhat complex. There are certain functions such that, given the (already known) value of the function for some real number, we can calculate the values of the function on the complex plane within a certain radius of that number using a Taylor series (beyond that radius the series diverges). We can then "recenter" our Taylor series using one of these new values, and calculate the function's values within a new radius. By repeating this process, it is possible to calculate the value of the function across the entire complex plane. However, once one "circles back" to the original domain, one occasionally finds that one's calculations give a new value for the function. This reflects the fact that the function is a multi-valued function.

<sup>49</sup> The extension from the real number line to the complex plane is not a case of analytic prolongation, which strictly means the extension of the function's domain from an open subset of the complex plane to a larger open subset of the complex plane containing the original one. Thus, it is by analytic prolongation that we can infer the logarithm function's behavior over the whole complex plane: we start with small open subset and analytically continue from there. However,



---

the general lesson about conceptual development holds even in the case of extending functions from the real numbers to the complex numbers – as we expand the domain of objects our concepts apply to, we should not be surprised to see our concepts behave in new and surprising ways, just as the logarithm function goes from single-valued to multi-valued when we move from the real numbers to the complex numbers.

<sup>51</sup> Stoljar 1995 p. 283.

<sup>52</sup> Stoljar 1995 pp. 283-284.

<sup>53</sup> And indeed, Stoljar's choice of criteria seems somewhat arbitrary, or at least culture-bound, since – on her account – the essence of WOMAN includes "fear of walking on the streets at night or fear of rape" and "undertaking "private" responsibilities like child-rearing rather than "public" responsibilities in the wider community" (Stoljar 1995 p. 284).

<sup>54</sup> Nicholson 1994 pp. 99-101; Heyes 2000 p. 84.

<sup>55</sup> Heyes 2000, pp. 154-180.

<sup>56</sup> Nicholson 1994, p. 100.

<sup>57</sup> A similar worry is raised by Jennifer Saul (unpublished).

<sup>58</sup> This suggests that the analogy between WOMAN and the natural logarithm function is actually more exact than it might first appear. To a rough approximation, the semantic value of a concept is a function from objects to truth-values. For example, the meaning of a concept like RED is a function that returns True when applied to a red delicious apple and False when applied to a granny smith. If that's the case, then just as the natural logarithm – a function from numbers to numbers – becomes multi-valued (and thus not a function in the strict sense) when its domain is extended from the real numbers to the complex numbers, so does WOMAN become multi-valued as its domain is extended further into the set of human beings. Hence our (metaphorical) thesis that women are a Riemann surface.

---

<sup>59</sup> This is a circular definition, but not necessarily a vicious one. See Gupta 2006 Chapter 3 for discussion.

<sup>60</sup> In this example and others, we use the pronouns that trans\* people would prefer. Thus, a trans man who cannot afford testosterone but identifies as a man is referred to using male gendered pronouns.

<sup>61</sup> For now, this is a descriptive claim, but we argue in the next section that it also supports a normative claim that feminist activists ought to take gender to have a theory facade structure.

<sup>62</sup> To take a well-known example, the Michigan Womyn's Music Festival (Serano 2007 Chapter 12).

<sup>63</sup> These reflections suggest some of the problems that eliminativism about Woman faces. As noted earlier, eliminativism is the idea that WOMAN should be abandoned in favor of some replacement set of "better" concepts like CHROMOSOMALLY FEMALE and HAS A FEMALE GENDER IDENTITY. The first problem is that the replacement concepts themselves will probably not be in any better shape than WOMAN – rather, it will be theory facades all the way down. Second, concepts like Woman are not merely imposed on their objects from without, but are used in the self-understandings of individuals. Moreover, WOMAN is implicated in a variety of other concepts, like STRAIGHT, SEXIST, GIRLY, etc. So it's not clear we could capture the content of people's self-understandings and social practices by simply replacing the messiness of WOMAN with some supposedly theoretically cleaner concepts. Since one of the tasks to which WOMAN is put is making sense of such things, eliminativism about WOMAN is not an analytically sound proposal.

---

<sup>64</sup> To take just one recent example, Elinor Burkett writes (in a New York Times editorial) "People who haven't lived their whole lives as women, whether Ms. Jenner [a trans woman] or Mr. Summers, shouldn't get to define us. That's something men have been doing for much too long. And as much as I recognize and endorse the right of men to throw off the mantle of maleness, they cannot stake their claim to dignity as transgender people by trampling on mine as a woman," (Burkett 2015). See Serano 2007 Chapter 12 for further discussion of these issues from a trans perspective.

<sup>65</sup> Recall that we are using "analytical" in Haslanger's sense (see §3), not in the usual philosophical sense that opposes it to "synthetic".

<sup>66</sup> Even though Haslanger's definition of WOMAN is somewhat relativised to context, within each context it still relies on the absolute criteria of being perceived to have physical features presumed to be evidence of having a female role in reproduction. As we will see, this absoluteness suffices to render both Smith's and Mt. Holyoke's admissions policies as mistaken by her lights.

<sup>67</sup> Mt. Holyoke College 2014; McCartney and Eveillard 2015.

<sup>68</sup> On Haslanger's definition, both trans men who have transitioned and trans women who have not receive, in some contexts, benefits on the basis of being believed to be male, and are therefore men (at least in those contexts).

<sup>69</sup> McCartney and Eveillard 2015.

<sup>70</sup> e.g. Mael 1998, Riordan 1994.

<sup>71</sup> Mt. Holyoke College 2014.

<sup>72</sup> Women's colleges often serve as refuges for transgender people because they typically offer more helpful environments for transitioning (Padawer 2014).

<sup>73</sup> We do not think that it follows from this analysis that Mt. Holyoke ought to refer to trans men using female pronouns. This is because the contexts of college admissions and personal address are simply different contexts, and in the latter we believe that people generally have the right to be known by what they wish to be known by.

<sup>74</sup> Zeigler 2013.

<sup>75</sup> TMZSports 2014, interviewing Rousey. We've edited Rousey's remarks slightly for clarity.

<sup>76</sup> Fox 2014.

<sup>77</sup> There are of course also unreasonable, i.e. viciously transphobic, parties, such as Matt Mitrione ("UFC Suspends Matt Mitrione" 2013).

<sup>78</sup> This assumption is not uncontroversial. See McDonagh and Pappano 2007 for an extended discussion of the history and ideology of women's athletics, and an argument against sex-segregated athletic leagues.

<sup>79</sup> Currah 2006. Whether intersex people should be included has been a source of controversy.

<sup>80</sup> Serano 2007

<sup>81</sup> Haslanger 2000 p. 230.

<sup>82</sup> Haslanger 2000 p. 227.

<sup>83</sup> For example, there is no opposite-sex analogue of androgen insensitivity syndrome – while people with XY sex chromosomes may be insensitive to androgens, there is no syndrome in which people with XX sex chromosomes are insensitive to female sex hormones. Similarly, there is no opposite-sex analogue of congenital adrenal hyperplasia.

## Works Cited

- Anonymous. (1964) "Student Nonviolent Coordinating Committee Position Paper: Women in the Movement." Retrieved June 8 2015 from [http://www2.iath.virginia.edu/sixties/HTML\\_docs/Resources/Primary/Manifestos/SNCC\\_women.html](http://www2.iath.virginia.edu/sixties/HTML_docs/Resources/Primary/Manifestos/SNCC_women.html)
- Atkinson, Ti-Grace. (1970, reprinted 1974) "Lesbianism and Feminism," pp. 83-88 in her *Amazon Odyssey*. New York: Links Books.
- Atkinson, Ti-Grace. (1972, reprinted 1974) "Lesbianism and Feminism: Justice for Woman as Unnatural," pp. 131-134 in her *Amazon Odyssey*. New York: Links Books.
- Bach, Theodore. (2012) "Gender is a Natural Kind with a Historical Essence." *Ethics* vol. 122 no. 2 pp. 231-272.
- Brown, Rita Mae. (1972, reprinted 1992) "Take a Lesbian to Lunch," pp. 185-195 in *Out of the Closets* ed. Karla Jay and Allen Young. New York: New York University Press.
- Burkett, Elinor. (2015). "What Makes a Woman?" *The New York Times* June 6 2015.
- Class Workshop. (1970, reprinted 1989). "What We Can Do about the Media." Excerpts on pp. 206-208 in Echols 1989.
- Currah, Paisley. (2006) "Gender Pluralisms Under the Transgender Umbrella." In *Transgender Rights*, eds. Paisley Currah, Richard M. Juang, and Shannon Price Mintner. Minneapolis: University of Minnesota Press.
- Echols, Alice. (1989) *Daring to Be Bad*. Minneapolis: University of Minnesota Press.
- Faludi, Susan. (2013) "Death of a Revolutionary." *The New Yorker* April 15 2013.

Fox, Fallon. (2014) "Fallon Fox responds to Joe Rogan and Ronda Rousey's claims of 'unfair advantages' in women's MMA." Retrieved June 9 2015 from

<http://www.bloodyelbow.com/2014/11/11/7192703/fallon-fox-responds-to-joe-rogan-and-ronda-rouseys-claims-of-unfair>

Freeman, Jo. (1995) "On the Origins of the Women's Liberation Movement from a Strictly Personal Perspective." Retrieved June 10 2015 from

<http://www.jofreeman.com/aboutjo/persorg.htm>

Gupta, Anil. (2006) *Empiricism and Experience*. Oxford: Oxford University Press.

Haraway, Donna. (1991) "A Cyborg Manifesto," pp. 149-182 in her *Simians, Cyborgs, and Women*. New York: Routledge.

Haslanger, Sally. (2000, reprinted 2012). "Gender and Race: (What) Are They? (What) Do We Want Them to Be?" pp. 221-247 in *Resisting Reality*. Oxford: Oxford University Press.

Hayden, Casey; King, Mary. (1964) "Sex and Caste: A Kind of Memo." Retrieved June 8 2015 from <https://www.uic.edu/orgs/cwluherstory/CWLUArchive/memo.html>

Heyes, Cressida. (2000). *Line Drawings: Defining Women through Feminist Practice*. Ithaca: Cornell University Press.

Jay, Karla. (1999) *Tales of the Lavender Menace: A Memoir of Liberation*. New York: Basic Books.

Jenkins, K. (2016, January). Amelioration and inclusion: Gender identity and the concept of woman. *Ethics* 126 (2), 394-421.

- Mael, F. A. (1998) "Single-sex and coeducational schooling: Relationships to socioemotional and academic development." *Review of educational research*, 68(2), 101-129.
- Mallon, Ron. (2007) "Human Categories Beyond Non-Essentialism." *The Journal of Political Philosophy* vol. 15 no. 2 pp. 146-168.
- McCartney, Kathleen and Eveillard, Elizabeth. (2015) "Admission Policy Announcement." Retrieved June 21 2015 from <http://www.smith.edu/studygroup/index.php>
- McDonagh, Eileen, and Pappano, Laura. (2007) *Playing with the Boys: Why separate is not equal in sports*. Oxford: Oxford University Press.
- Mehrhof, Barbara. (1970) "On Class Structure Within the Women's Movement." pp. 103-108 in *Notes from the Second Year*, ed. Shulamith Firestone and Anne Koedt. New York: Radical Feminism.
- Mt. Holyoke College. (2014) "Admission of Transgender Students," retrieved June 21 2015 from <https://www.mtholyoke.edu/policies/admission-transgender-students>
- Nicholson, Linda. (1994) "Interpreting Gender." *Signs* vol. 20 no. 1 pp. 79-105.
- Padawer, Ruth. (2014) "When Women Become Men at Wellesley." *New York Times Magazine*. Retrieved June 8 2015 from [http://www.nytimes.com/2014/10/19/magazine/when-women-become-men-at-wellesley-college.html?\\_r=0](http://www.nytimes.com/2014/10/19/magazine/when-women-become-men-at-wellesley-college.html?_r=0)
- Riordan, C. (1994) "The value of attending a women's college: Education, occupation, and income benefits," *The Journal of Higher Education*, 486-510.
- Saul, Jennifer. (unpublished). "'Woman': A Puzzle and Some Methodological Musings."
- Serano, Julia. (2007) *Whipping Girl*. Berkeley: Seal Press.

Students for a Democratic Society. (1962) "Port Huron Statement." Retrieved June 8 2015 from

<http://coursesa.matrix.msu.edu/~hst306/documents/huron.html>

Students for a Democratic Society. (1967a) "Liberation of Women." *New Left Notes* Chicago,

July 10 1967, vol. 2 no. 26.

Students for a Democratic Society. (1967b) "Chicago Woman form Liberation Group." *New*

*Left Notes* Chicago November 13 1967, vol. 2 no. 39.

Stoljar, Natalie. (1995) "Essence, Identity, and the Concept of Woman." *Philosophical Topics*

vol. 23 no. 2 pp. 261-293.

TMZSports. (2014) "Ronda Rousey -- Fallon Fox Has Unfair Advantage -- But I'd Still Beat Her

Ass!" Online video clip, posted September 19 2014, retrieved June 9 2015 from

<https://www.youtube.com/watch?v=D0tXP17GgqU>

"UFC Suspends Matt Mitrione for Ripping Transgender Fighter Fallon Fox." (2013) April 8

2013, *USA Today*. Retrieved June 9 from

<http://www.usatoday.com/story/sports/ufc/2013/04/08/ufc-suspends-matt-mitrione-fallon-fox-comments/2065083/>

Wilson, Mark. (2006) *Wandering Significance*. Oxford: Oxford University Press.

Zeigler, Cyd. (2013) "Fallon Fox Comes Out as Trans Pro MMA Fighter." *Outsports.com*

March 5 2013. Retrieved June 9 2015 from

<http://www.outsports.com/2013/3/5/4068840/fallon-fox-trans-pro-mma-fighter>