

United States General Accounting Office

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**GAO**

Briefing Report to the Chairman,  
Subcommittee on Military Personnel  
and Compensation, Committee on  
Armed Services, House of  
Representatives

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September 1989

# WOMEN IN THE MILITARY

## Career Progression Not a Current Problem but Concerns Remain





United States  
General Accounting Office  
Washington, D.C. 20548

National Security and  
International Affairs Division

B-230552

September 7, 1989

The Honorable Beverly B. Byron  
Chairman, Subcommittee on Military  
Personnel and Compensation  
Committee on Armed Services  
House of Representatives

Dear Madam Chairman:

This briefing report responds to your August 19, 1988, request that we examine whether impediments exist to equitable career progression opportunities for women in the military. We briefed your staff on the results of our work on May 19, 1989 (see app. I).

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## Results in Brief

Although policy and other factors such as combat exclusion can impede women's career progression, promotion data for 1986 through 1988 show that women are being promoted at rates similar to men. This may be attributed to the high quality of women entering the armed forces or the special instructions given to promotion boards that were designed to address the competitive disadvantages that women have due to the combat exclusion and other reasons. Because the numbers of women competing for and achieving senior grades are small compared to men, variances between the selection rates are not always significant and do not necessarily mean that impediments to career progression for women have had no effect.

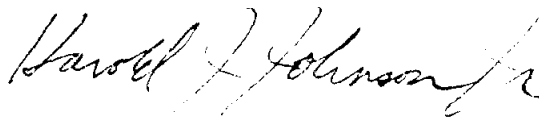
Most women we interviewed saw the processes related to assignments, promotions, and educational opportunities as fair to women. They had mixed views, however, on whether laws and policies concerning combat exclusion—a major career impediment—should be changed to allow women to serve in all positions. Some believed that the laws and policies should be changed to remove this impediment, while others did not. The policy question of opening combat positions to women has been debated extensively, particularly since the beginning of the All-Volunteer Force, and was the subject of our recent report.<sup>1</sup>

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<sup>1</sup>Women in the Military: More Military Jobs Can Be Opened Under Current Statutes (GAO/NSIAD-88-222, Sept. 7, 1988).

GAO staff members who made major contributions to this briefing report are listed in appendix III. If you have any questions, please call me on 275-3990.

Sincerely yours,

A handwritten signature in cursive script that reads "Harold J. Johnson Jr.".

Harold J. Johnson  
Director, Manpower Issues

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**Abbreviations**

DACOWITS	Defense Advisory Committee on Women in the Service
DOD	Department of Defense
GAO	General Accounting Office
EO	Equal Opportunity
LDO	Limited Duty Officer

determine whether impediments to women's career progression exist.  
Figure I.1 shows this objective.

Figure I.1

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GAO Objective

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- Do impediments exist to women's career progression?

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1

Figures I.2 and I.3 show the scope of our work.

Figure I.3

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**GAO**    **Scope and Methodology**  
**(Con.)**

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- Analyzed Promotion, Command, Military Education, and Other Statistics For 1986-88
- Discussed Performance Evaluations, Career Paths, and Women's Utilization
- Reviewed Studies
- Interviewed 82 Women Officers and Enlisted

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Our scope included active duty officer and enlisted personnel in the Army, Air Force, Navy, and Marine Corps, but was limited to officers and enlisted personnel who are promoted by selection boards.<sup>3</sup> These boards, using guidance and instructions provided by service secretaries,

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<sup>3</sup>Selection boards are used generally to select promotees for officer grades 0-3 and above and enlisted grades E-6 through E-9. Lower graded personnel are promoted primarily based on time-in-grade.

Figure I.4

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## GAO Key Organizations Visited

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- Army
  - Dep Chief of Staff, Personnel
  - Total Army Personnel Command
  - Equal Opportunity Branch
  - Fort Eustis
  
- Air Force
  - Dep Chief of Staff, Personnel
  - Military Personnel Command
  - Equal Opportunity Branch
  - Langley Air Force Base

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4

Male biases toward women, personal career choices, noncompetitive performance experiences and evaluations, and lower accessions and retention of women were also seen by many of those we interviewed as factors that may affect career progression. Although difficult to measure, we were told that male biases against women can affect a woman's progression, including assignment to a less career enhancing position,

Figure I.6

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GAO Others Contacted

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- Defense Manpower Data Center
- DACOWITS Military Liaisons
- HQ Inspector General Staffs
- Defense Equal Opportunity Management Institute
- Women's Equity Action League

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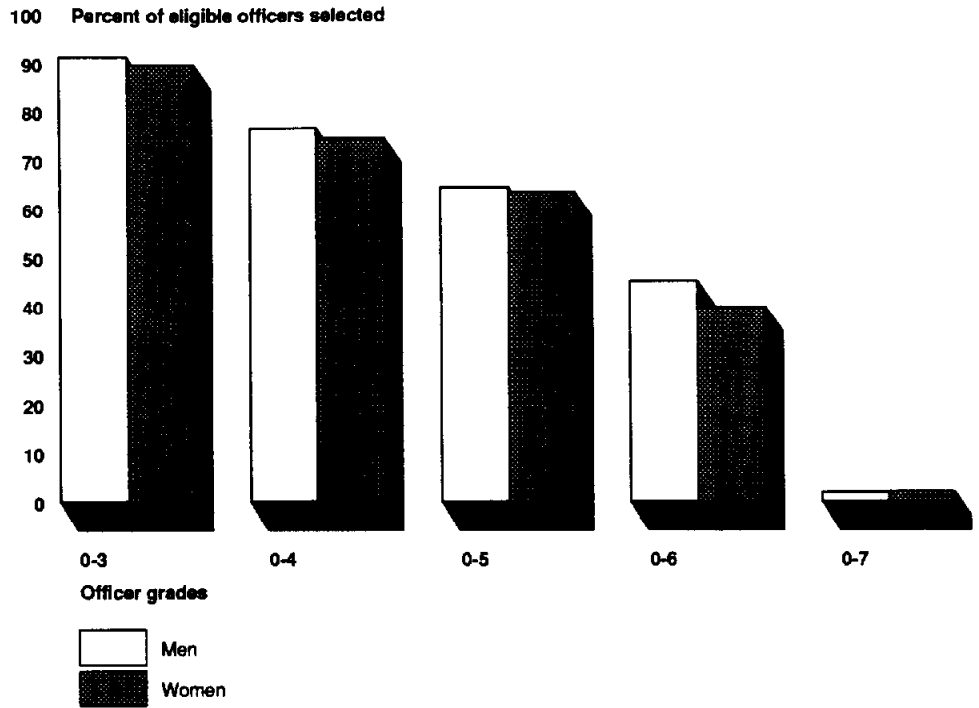
to men. These decisions include family considerations, requests for joint domicile (specific assignments or geographic locations for married couples) and working outside one's specialty.

Finally, as we reported in September 1988, fewer women are allowed to enlist in the military than men, and retention rates for women are also lower. Consequently, the number of women available to compete for



Appendix I  
 Career Progression of Women in the Military

Figure I.7: Officer Promotions for 1986 Through 1988



Number of personnel in each category

- O-3: Men 47,244; Women 5,894
- O-4: Men 21,308; Women 1,884
- O-5: Men 8,881; Women 418
- O-6: Men 4,598; Women 61
- O-7: Men 464; Women 4

impede progression. Women are represented in the assignment process, serving as assignment managers, monitors, and occupational specialty managers.

Each service has a policy to provide equal opportunity for all personnel in making assignments—regardless of sex—consistent with applicable laws and regulations. Because of the combat exclusion and the resulting reduced progression opportunities, women cannot be assigned to certain positions, units, aircraft, ships, and specialties. The combat exclusion affects how competitive women's career records may be with men's records in some specialties, such as Army field artillery or Navy surface warfare. Also, combat exclusion reinforces some men's perceptions that

Figure I.9

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## GAO Career Progression Factors

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- Assignment Policies/Processes
- Local Assignment Practices
- Career Paths
- Command Opportunity
- Professional Military Education
- Services' Promotion Processes

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9

In addition to combat exclusion, women face other assignment restrictions because of inadequate living facilities (e.g., berthing configurations on ships), and the cultural norms that some countries have in dealing with women. However, we were told that these restrictions have not been impediments to career progression since career enhancing assignment alternatives are available.

are accepted as an integral part of the unit, given career enhancing assignments, and/or assigned to positions outside their career specialties.

During their August 1988 visit to Europe, DACOWITS representatives heard complaints about women being assigned outside their career specialties to administrative or secretarial jobs. Military officials we interviewed also told us this happens, but the frequency of such cases is unknown. Local command and Inspector General officials from the services said that they had not reviewed the extent to which this occurs.

Officer career paths, also known as professional development paths, were not viewed by most officials we interviewed, as affecting women's career progression (see fig. I.12). These paths are planning tools that define the types of experiences and assignments needed for a career specialty at specific grade levels. Their use and importance varies by service, but the Army and Navy have specific career paths. The Air Force and Marine Corps do not use specific career paths. Instead, they emphasize the importance of performance on individual assignments.

Because of combat restrictions, some Navy paths in the same specialties are different for men and women, such as surface warfare and aviation. A Navy study cited the career path for the general unrestricted line,<sup>5</sup> composed mostly of women, as not being clearly defined. However, the path is currently being revised to show some specific assignments.

Serving in command positions is often considered essential for promotion; however, as indicated in figure I.13, many women we interviewed expressed concern about not having the same opportunity as men to be selected for command. The services' equal opportunity assessments and studies also raised some concern that women are not selected for command as often as men. DACOWITS is pursuing this issue.

Women's opportunities to fill command positions vary by specialty. Women generally have had fewer opportunities to be selected for command positions because (1) combat exclusion laws and policies close a number of command positions to them, (2) women frequently serve in occupations having fewer command positions, and (3) many women are not yet senior enough to be competitive for a command position.

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<sup>5</sup>Unlike other officer communities, this line has no specific billets or positions associated with it.

Figure I.12

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## GAO Career Paths

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- Viewed As Not Affecting Women's Progression
- Varies By Service
- Separate Paths Sometimes Exist For Women

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12

did not reflect any trends or patterns. The data shows that from 1986 to 1988, women were selected for military education slots at rates higher than, lower than, and equivalent to men. However, the numbers of women eligible and selected were small compared to the number of eligible men. Those responsible for managing this process told us that women may be selected for professional military education at higher

Figure I.14

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## GAO Professional Military Education

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- Opportunities Viewed As Fair
- Statistics Show Variances Between Men and Women Selection Rates

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14

We found that each service promotion process stresses the importance of selecting the best qualified person and emphasizes an equal opportunity philosophy, but that the promotion processes differ for various grades, and sometimes differs in how women are evaluated. For example, officers above O-2 and enlisted personnel above E-6 typically compete for promotions by competitive category. Below these levels,

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instructions address the competitive disadvantage that women have due to the combat exclusion or because of past personal and institutional discrimination. According to Army and Navy instructions, board members are to appropriately consider these disadvantages in evaluating women's records.

Excerpts from the Navy supplemental guidance state that due to both the historic and existing statutory restrictions on assigning women, women's records may show career patterns different from men. Furthermore, such restrictions on assignment cannot be allowed to prejudice the selection of women for advancement. In determining a woman's qualifications, the guidance states that a woman's assignment should be given weight equal to that of men not constrained by the combat exclusion and that emphasis will be placed on her actual performance rather than the pattern of assignments.

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## Promotion Results

Data for officer and enlisted promotions for 1986 through 1988 show variances, but generally indicate comparable selection rates for men and women (see figs. I.7, I.8, and I.16).

Because the numbers of women competing for and achieving senior grades are small compared to men, variances between the selection rates are not always significant and do not necessarily mean that impediments to career progression for women have had no effect.

The data show that the choice of a career field can affect the rate and level of promotion, and men and women serving in the same career fields would be similarly affected. People serving in combat specialty career fields are generally promoted more rapidly than people in noncombat specialties, and are generally promoted to higher levels. Since women cannot serve in many combat specialties, their opportunities to progress as rapidly or as far as men are limited.

Combat exclusion is the greatest impediment women face in achieving higher grades. For example, many flag officers come from combat specialties that are generally excluded to women. Also, because the combat exclusion restricts women from obtaining certain experiences, this makes them less competitive for promotion than men who receive the prerequisite experiences. Few women are eligible to compete for, have been promoted to, or currently serve as flag officers. However, since women are now coming into the services in larger numbers, officials we interviewed expect them to hold more flag officer positions in the future.

between men and women, although differences existed in the past. Also, several women believed that their opportunities were better now than before.

Figure I.17

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## GAO Women's Views

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- Assignment and Promotion Processes
- Military Education Opportunity
- No Differences Noted In Male/Female Evaluations
- Better Opportunities Exist Now Than In The Past

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17

Many women viewed combat exclusion as the major impediment to their career progression in the military. However, they expressed mixed

Figure I.18

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## GAO Women's Views (Con.)

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- Combat Exclusion Limitations (Major Concern)
- Male Bias
- Acceptance and Limited Opportunity At Senior Ranks
- Command Opportunity
- Sexual Harassment



Appendix II  
Comments From the Department of Defense

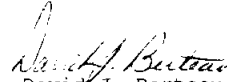
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to integrate enlisted women into nontraditional skill areas--with explicit focus on recruiting and assignment policies. Each of the Military Departments has subsequently briefed the Secretary of Defense that these actions have been accomplished.

Lastly, the Department will continue to take corrective action to eliminate male bias and other forms of discrimination toward women in the military. One such measure referenced in the GAO Draft Report is the DoD-wide survey to determine the incidence of sexual harassment and the effectiveness of programs to combat it. The analysis of the survey will be completed later this year.

The Department of Defense has taken and continues to pursue proactive and aggressive measures to ensure fair and equitable treatment of all military men and women.

Sincerely,



David J. Berteau

Deputy Assistant Secretary of Defense  
(Resource Management & Support)

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# Related GAO Products

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Women in the Military: More Military Jobs Can be Opened Under Current Statutes (GAO/NSIAD-88-222, Sept. 7, 1988).

Women in the Military: Impact of Proposed Legislation to Open More Combat Support Positions and Units to Women (GAO/NSIAD-88-197BR, July 15, 1988).



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---

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# Comments From the Department of Defense



FORCE MANAGEMENT  
AND PERSONNEL

THE OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301-4000

15 AUG 1989

Mr. Frank C. Conahan  
Assistant Comptroller General  
National Security and International  
Affairs Division  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Conahan:

This is the Department of Defense response to the General Accounting Office Draft Report, "WOMEN IN THE MILITARY: Career Progression Not A Current Problem" (GAO Code 391097/OSD Case 8049).

The Department concurs with the report findings. Since women are a vital resource and an integral part of the Armed Forces, the Department will continue to ensure that women are provided full and equal opportunity to pursue appropriate careers in the military services, and that no artificial barriers to career opportunity for women are constructed or tolerated. Women will be utilized in all roles except those explicitly prohibited by combat exclusion statutes and related policy.

As cited in the Draft Report, in September 1987, the Department established the DoD Task Force on Women in the Military to address concerns about the full integration of women in the Armed Forces. An outcome from the Task Force was the Department's adoption of the DoD "risk rule." The risk rule standardized the various interpretations of the combat exclusion statutes and policies, particularly as they applied to noncombat support units and positions that excluded women. Using the risk rule, the Services reviewed their noncombat support units and other positions prohibited to women, resulting in over 24,000 additional positions being opened to women.

Additionally, the Task Force addressed the manner in which various force management policies may impact adversely on women's career development. They focused on leadership development and assignment of women officers to key billets, and the integration of women into the traditionally-male skill areas. Approval of the Task Force recommendations by the Secretary of Defense caused the Secretaries of the Military Departments, along with each Chief of Service, to address the issue of women officer leadership development and key billet/command assignment as a matter of priority and to develop a comprehensive plan

views on whether the combat exclusion should be eliminated. Women generally believed that the combat exclusion restricts the areas in which they can serve. Some women officers indicated that they would like to see the combat exclusion restrictions lifted or modified, but they indicated that enlisted women may have a different view point. In addition, some women said combat exclusion affects how some men perceive women's contributions. Other continuing concerns included male biases against women, lack of acceptance into units, limited opportunities to enter the senior ranks, and the limited opportunities to gain command experience.

Some women expressed concern about sexual harassment. This has been identified as a serious problem in recent service and DOD studies. Services are continuing to address this issue and DOD is currently conducting a survey questionnaire on sexual harassment.

Figure I.16

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## GAO Promotion Results

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- Statistics Indicate Similar Selection Rates (Figs. 1.7 & 1.8)
- Number of Women at Senior Ranks is Very Small
- Some Occupations Promote Faster and Farther
- Combat Exclusion Impacts Women Achieving Senior Ranks

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16

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### Women's Views on Career Progression

We interviewed 82 military women—63 officers and 19 enlisted members—from various occupational specialties. Most women generally believed that the assignment and promotion processes and military education selection opportunities were fair to women, as shown in figures I.17 and I.18. Many did not believe performance evaluations differed

Figure I.15

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## GAO Promotion Processes

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- Viewed As Fair and Equitable
- Best Qualified/EO Emphasized
- Processes Differ
- Some Special Provisions Exist Regarding Women

---

15

promotions are basically achieved by time in grade, good performance, test scores, and recommendations by commanders.

All services, except the Air Force, have special provisions in their promotion instructions regarding women, and the Army recently established a goal to select women at a rate not less than that of officers competing for the first time. The special provisions in promotion board

Figure I.13

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## GAO Command Opportunity

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- Many Women Express Concern
- Annual Assessments and Studies Show Some Inequity
- Selection Processes Differ and Opportunities Vary

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13

rates than men because they are more available than men to attend school.

As shown in figure I.15, most of the women and other military officials we interviewed believe that the services' promotion processes are fair.

Figure I.11

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## GAO Local Assignment Practices

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- Some Concern With Practices
- Local Units Determine Actual Assignment
- Male Bias Could Affect Women's Opportunities
- Use Of Women Cited As Concern But Not Quantified

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11

As indicated in figure I.14 many officials we interviewed believed women's opportunities to obtain professional military education were equal to men's.

The services' annual equal opportunity assessments show that variances in selection rates between men and women do exist, but the data

Figure I.10

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**GAO Assignment Policy/Process**

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- HQ Policies/Processes Not Viewed As Impediment
- Women Represented In Assignment Process
- Provide EO Within Law
- Contain Restrictions Applicable To Women

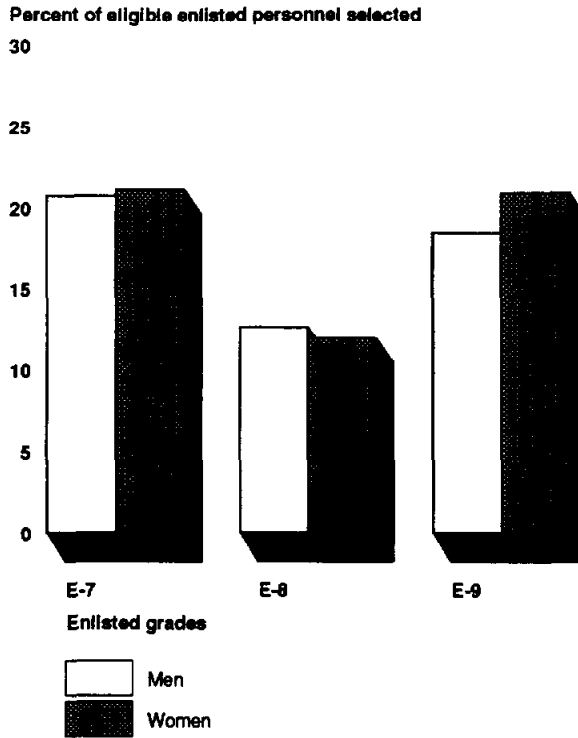
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Some women with whom we spoke voiced concern about assignment processes at the local command level as listed in figure I.11. The service personnel centers assign personnel to commands or specific billets; however, the local commanders typically determine which positions specific personnel actually fill. Although not quantified, many women we interviewed said that male biases exist and that this can affect how women

Appendix I  
 Career Progression of Women in the Military

Figure I.8: Enlisted Promotion for 1986 Through 1988



Number of personnel in each category

E-7: Men 64,186; Women 3,799  
 E-8: Men 23,505; Women 547  
 E-9: Men 8,250; Women 95

women do not experience the same hardships they do or women may receive preferential treatment.

However, the services are opening more opportunities to women. In November 1988, service evaluations of the combat "risk rule"<sup>4</sup> opened an additional 24,000 positions to women, including certain positions on Navy combat logistic force ships, with the Army's engineer combat support equipment companies, in Air Force reconnaissance and surveillance squadrons, and with the Marine Corps' embassy security forces.

<sup>4</sup>In September 1987, DOD's Task Force on Women in the Military developed a standard "risk rule" for determining which noncombat units and positions to close to women. Under the rule, services can close noncombat positions or units on the grounds of risk of exposure to direct combat, hostile fire, or capture.



senior officer and enlisted grades is small and few women serve at these levels. We were told by military personnel officials we interviewed that women leave the services for some of the same reasons men do, including better civilian employment opportunities, family considerations, or the difficulties of military life, but that they leave at higher rates than men.

DOD data show that overall, women who pursue a military career advance more rapidly than men, but are more likely than men to retire after only 20 years. Since achieving senior officer or enlisted ranks typically takes longer than 20 years, a higher proportion of women than men retire before achieving senior ranks. In 1987, the time for women to achieve the grade of O-7 (general or flag rank) ranged from 24.7 to 29.3 years. Women typically took 20.5 years to achieve E-9, the highest enlisted grade. However, men took from 27.8 to 30.9 years to achieve the grade O-7, and 21.5 years to achieve the grade E-9.

Officer and enlisted promotion data for 1986 through 1988 suggest that factors that may impede a woman's career progression have had only a limited impact since women were generally promoted at rates comparable to men. Figures I.7 and I.8 show the percent of eligible enlisted personnel and officers selected for promotion for 1986 through 1988, respectively.

In considering these rates, it is important to keep in mind that the number of women compared to men competing for the senior ranks is very small. Consequently, promoting a few women could have a significant impact on the selection percentage. For example, 2 of 55 women were selected for the grade O-7 in 1988 as compared to 150 of 8,355 men. This represented women being selected at twice the rate as men, 3.6 percent for women and 1.8 percent for men, even though women only represented about 1 percent of the promotees.

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## Career Progression Factors

Figure I.9 lists six factors that some interviewees suggested may hinder women's career progression: headquarters assignment policies and processes, assignment processes at operational field units, career paths, command opportunities, professional military education, and the promotion process.

Figure I.10 identifies assignment policies and processes that can affect women's progression. Except for the combat exclusion restrictions, women and others we interviewed generally said that the services' assignment policies and processes were fair to women and did not

Figure I.5

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**GAO Key Organizations Visited  
(Con.)**

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- Navy
  - Bureau of Naval Personnel
  - Military Personnel Command
  - Equal Opportunity Division
  - Naval Station, Norfolk
  
- Marine Corps
  - Dep Chief of Staff, Manpower
  - Equal Opportunity Branch
  - Fleet Marine Force, Atlantic

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assignment outside her specialty, lower performance ratings, promotion board scores, and lack of acceptance into a unit. We were told that male biases may also contribute to women's lower retention rates.

Several individuals we interviewed stated that a woman's personal career decisions can adversely affect her career progression because of the types of experiences she receives, but we noted that this also applies

evaluate records of eligible candidates by competitive category and grade, and recommend the best qualified candidates for promotion. Because of their limited number, we excluded warrant and limited duty officers from our review. To obtain the necessary data, we

- interviewed assignment and promotion officials;
- reviewed assignment and promotion policies/processes;
- analyzed data on promotions, command assignments, military education, and other promotion factors for 1986 through 1988;
- interviewed service officials and military women about the fairness of performance evaluations, the effects of career paths, and how women are used in the military;
- reviewed various studies concerning women's issues; and
- interviewed 181 officials, including 82 women officers or enlisted personnel, concerning women's career progression.

We performed our work from November 1988 to March 1989 in accordance with generally accepted government auditing standards.

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### Key Organizations Visited

We performed our work at the services' headquarters, personnel centers, equal opportunity organizations, and operational field units. The key organizations we visited are shown in figures I.4 and I.5.

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### Others Contacted

Figure I.6 also lists some other organizations contacted to obtain data or their views on women in the military issues.

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## Legal and Policy Issues and Other Factors Affecting Career Progression

We identified both legal and policy issues and other factors that could affect women's career progression. Combat exclusion laws and policies, for example, close command opportunities to women and can affect the rate and level of progression for women since promotion opportunities are better in some career specialties currently closed to them. According to military officials, men in some career specialties face similar impediments; however, men are not restricted from a particular career field because of gender and have a wider choice of career occupations.

Most of the officials we interviewed considered command experience as career enhancing; however, the career fields where women can serve sometimes have fewer opportunities to be selected for command. Lack of command experience can affect women's competitiveness and is viewed by many of those we interviewed as an impediment.

Figure I.2

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## GAO Scope and Methodology

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- Army, Air Force, Navy, and Marine Corps Active Duty Officer and Enlisted Personnel
- Excluded Warrants and LDOs
- Interviewed Assignment and Promotion Officials
- Reviewed Assignment and Promotion Policies, Processes, and Results

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2

# Career Progression of Women in the Military

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## Background

Since the inception of the All-Volunteer Force in 1973, women have become a significant and integral part of the U.S. armed forces. However, concerns continue to arise regarding their full integration into the military. These concerns focus on roles, combat exclusion limitations,<sup>1</sup> accessions and retention rates, leadership opportunities, career development and progression, sexual harassment, and pregnancy. Women comprised 10.5 percent of the total force in 1988 compared to 2.5 percent in 1973, and the types of jobs held by women have continued to expand.

Recent studies by GAO and the Department of Defense (DOD) have addressed issues associated with women serving in the military. In September 1988, we reported that about 1.1 million of 2.2 million military jobs were closed to women due to combat exclusion and related program needs. Further, many of the remaining positions were limited to women by service practices. Our July 1988 report addressed the impact of proposed legislation to open more combat support positions and units to women.<sup>2</sup>

The Defense Advisory Committee on Women in the Service (DACOWITS) advises the Secretary of Defense on military women issues. One of its three working committees addresses career opportunity. In late 1987, DOD established a Task Force on Women in the Military as a result of concerns raised by the committee about the full integration of women in the armed forces. Concurrently, the Navy and Marine Corps established task forces to address the progress and utilization of women. In late 1988, the Army also reviewed women's professional development. The services annually assess various categories to ensure men and women have equal opportunity including promotions, command, and military education.

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## Objective, Scope, and Methodology

Frequently, concerns have been expressed about career barriers that may exist for women in the military that do not exist for men. The Chairman, Subcommittee on Military Personnel and Compensation, House Committee on Armed Services, asked us to study this issue and

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<sup>1</sup>Sections 6015 and 8549 of title 10 U.S.C. prohibit assigning women to aircraft and naval vessels having combat missions. The Women's Army Corps with its own exclusions existed in 1948 when title 10 provision became law. Title 10 included no specific combat restriction on Army women. With the dissolution of the Corps in 1978, the Army, as a matter of policy, prohibited women from jobs most likely to engage in direct combat.

<sup>2</sup>Women in The Military: Impact of Proposed Legislation to Open More Combat Support Positions and Units to Women (GAO/NSIAD-88-197BR, July 15, 1988).

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## Agency Comments

The Department of Defense (DOD) concurred with the information and observations contained in this report. DOD stated that it will continue to ensure that women are provided full and equal opportunity to pursue appropriate careers in the military services and that no artificial barriers to career opportunities for women are constructed or tolerated.

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## Objective, Scope, and Methodology

Our objective was to determine whether impediments exist to equitable career progression opportunities for women. To accomplish this objective, we first reviewed assignment and promotion policies and processes of each service; analyzed information on promotion, education, command, and other related areas for 1986 through 1988; and reviewed DOD and other studies addressing women's issues. Because the data indicated that service promotion policies were fair to women and that women were being promoted at rates comparable to men, we limited the scope of our work to interviewing 181 officials, about half of whom were women, concerning issues related to women's career progression. Interviewees were not statistically sampled, however, and their views may not be representative of the views of all military personnel. We also contacted a number of other organizations to obtain data and their views on issues related to women in the military. Appendix I contains more detailed information on our scope and methodology.

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Unless you publicly announce its contents earlier, we plan no further distribution of this report until 7 days from the date of this letter. At that time, we will send copies to the Chairmen, House and Senate Committees on Appropriations and on Armed Services; the Secretaries of Defense and the Army, Navy, and Air Force; and the Director, Office of Management and Budget. We will also make copies available to other parties upon request.

