REVIEW ESSAY

The Power Pyramid

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I. INTRODUCTION

Susan Estrich has power—“the power to change the rules for others.”¹ In her book, Sex & Power,² Estrich explores her own power and the power of women in general. Estrich examines a wide range of topics, from legal responses to gender inequality, to motherhood, to women in politics. Estrich knows these topics well. She is a law school professor,³ former presidential campaign manager,⁴ mother,⁵ nationally syndicated columnist,⁶ legal and political analyst,⁷ and author of several books.⁸ In Sex & Power,
Estrich explores these topics in the pursuit of one goal: she wants to tap into the enormous power American women have at their fingertips and get women to work together to wield power in the common interest of women. She wants powerful women to stand up for the most powerful women and complete the feminist revolution, which promises change and individual freedom for all women. Written with passion and a belief in the power of feminism to promote change, Sex & Power promises to promote much needed discussion of the stalled feminist revolution.

II.
THE POWER PYRAMID, AS ESTRICH SEES IT

Those who write about increased equality for women generally focus on topics that fall under three major categories—women and work, women and the family, and women and their bodies. The women and work category includes issues such as comparable worth, sex role stereotypes, and sexual harassment. The women and family category includes issues such as marriage, divorce, and domestic violence. The women and their bodies category includes issues such as rape, pregnancy, prostitution, and pornography. In Sex & Power, Estrich considers topics that fall under all three categories, but her primary focus is on women and work. It is clear from reading Estrich’s book that she is striving to re-energize the feminist

10. Id. She asks, “Can we bring ourselves to recognize our common interest as women, and wield power on the basis of it?”
11. Estrich explains how Madeleine Albright became the first woman to serve as Secretary of State because women (“girls”) stood up for her. Id. at 4. She uses the example of how women stood up for Albright as an example of the kinds of actions that will promote positive change for women in general.
12. Id. at 29. Estrich writes: “But what we need isn’t just equality. It is change. The only way to free the individual woman to become all that she can is for women to act as women, to wield power as women, so that as individuals we can be free. That is what made feminism a revolution. It’s just not finished.” Id.
13. These are the categories and topics delineated in the table of contents of JUDITH G. GREENBERG, MARTHA L. MINOW & DOROTHY E. ROBERTS, MARY JO FRUG’S WOMEN AND THE LAW xxiii (2d ed. 1998).
14. Estrich does consider topics that fall under the other two categories: women and family, and women and their bodies. For example, Estrich includes a chapter about motherhood, Motherhood as Destiny (Chapter Five), in SEX & POWER, at 91-117. However, she is mainly interested in intersections between motherhood and the public world, e.g., the labor market. In particular, she wants to “identify policies and practices that exclude half the population from achieving their full potential in the public world.” Id. at 98. Her primary point in Chapter Five is that women who choose to become parents suffer in the workplace because employers are unlikely to view them as workers on a fast track. See id. at 105, 116. Estrich also writes about rape. In a chapter entitled Sexual Power (Chapter Eight), id. at 165-213, she writes about her experience as a rape victim. Her primary point in this section of Chapter Eight is to point out how, in the twenty-five years since she was raped, the law has changed to provide more support for rape victims. Id. at 173-79.
revolutions with the aim of shattering the glass ceiling. In particular, she is interested in inspiring the types of change that will facilitate the entry of more women into top jobs in academia, corporations, and the political arena.

In her book, Estrich does not explicitly mention a power pyramid, but readers can infer from her writing that she envisions a pyramid comprised of three tiers of women. She recognizes that a small number of women work in very high places (top-tier women), some work in jobs with a moderate amount of power (middle-tier women), many more work in positions with little power (bottom-tier women), and yet even more have no power and are excluded from the pyramid altogether (powerless women). Estrich, a top-tier woman, envisions a world in which top-tier women lift middle-tier women, who lift bottom-tier women, who bring powerless women onto the pyramid. This process of helping hands is fueled by the belief that "[t]he way you pay back is by helping the next wave." Feminism is the underlying power and strength of the whole change process; it is the lifeblood of the helping hands.

It is important to explain the impact feminism has had on Estrich's life and career. Feminism gave Estrich's life meaning and purpose. Estrich writes, "You can't change the rules if you're not in the room. You can't finish a revolution without getting in there and fighting." SEX & POWER, at 17.

The glass ceiling is a metaphor that describes hidden barriers that prevent individuals or groups from advancing upward in their organizations into high-level managerial positions. The Federal Glass Ceiling Commission A Solid Investment: Making Full Use of the Nation's Human Capital, (1995), at http://www.ilr.cornell.edu/library/e_archive/gov_reports/GlassCeiling/documents/GlassCeilingRecommendations.pdf (last visited October 15, 2002). A nonprofit organization called Catalyst conducts research on the glass ceiling. It strives to help working women maximize their employment opportunities by working with both women and employers. See infra note 60.

Estrich includes a chapter about corporate America, Changing the Face of Corporate America, in SEX & POWER and highlights lawsuits that have challenged discriminatory behavior in corporate America. See SEX & POWER, at 160-63.

In a chapter entitled Political Power, Estrich provides the reader an inside look at the political arena. For example, she provides a critique of Al Gore's 2000 Presidential campaign. See id. at 215-27. She writes, "The Gore campaign's idea of affirmative action is finding five white guys in the most diverse city in America [Los Angeles]." Id. at 217. She wants the reader to know that Gore did not try hard enough to include powerful women in his core group of strategic decision-makers.

Estrich writes, "Get new women promoted and your power grows. They're indebted to you, and they owe you. You're viewed as a kingmaker. Colleagues realize you must be taken seriously. Power begets power." Id. at 156. Then, she writes, "The most important step to getting more women in very high places is just to get more women in the room." Id. at 158. Finally, she writes, "It isn't only the women at the top who have power, collectively. Women in the middle can help women at the bottom; women at the bottom can help women get in." Id. at 159.

Estrich does not point out that several schools of feminism exist. It is clear from reading SEX & POWER that Estrich is a liberal feminist. Liberal feminists believe that once women experience equal opportunity, they will be able to achieve equality. For a description of different schools of feminism—radical, Marxist-socialist, psychoanalytic, existentialist, postmodern, multicultural, global, and
writes about what happened when, as a student,\textsuperscript{22} she discovered feminism. She writes, "[f]eminism changed the way I looked at the world. It was as if someone had handed me a new set of questions that I'd never thought of, questions that made clear that it wasn't just me, that I wasn't crazy, that I had a right to better treatment."\textsuperscript{21} Estrich continues by stating that "[f]eminism. . . gave me a reason to want to [break into the boys' clubs]; a mission that was larger than myself, along with the armor to wear and the comrades to march with."\textsuperscript{24} One of Estrich's key themes is that women should look beyond their self-interest to the needs of less powerful women. At the same time, she sees women at every tier of the pyramid as potential supporters of the highest-ranking, top-tier women. As Estrich envisions the power pyramid, the relationships among women at all levels of the pyramid are mutually reinforcing. Feminism is the glue that holds together a community support system for women.

Estrich realizes that an abstract belief in feminism is not enough to rejuvenate the feminist revolution. In addition to having faith in feminism, women must know the facts. They must understand the way the world currently operates so they will understand why they should care to look beyond themselves and march toward increased equality. In particular, she wants readers to understand\textsuperscript{25} (1) how much extraordinary women need each other,\textsuperscript{26} (2) ways in which judges have failed to promote gender equality,\textsuperscript{27} (3) how far women still have to go to become part of the ecofeminism—see Rosemarie Putnam Tong, Feminist Thought: A More Comprehensive Introduction (1998).

\textsuperscript{22} Sex & Power, at 7, 169. Estrich was an undergraduate student at Wellesley College and later a law student at Harvard University.

\textsuperscript{23} Id. at 6. Estrich has experienced gender discrimination in the workplace. For example, she describes how Justice Brennan of the United States Supreme Court refused to hire her as a judicial clerk because of her gender. Id. at 50. She writes, "The most liberal member of the court, the most articulate opponent of sex discrimination, wouldn't hire me because I was a woman." Id.

\textsuperscript{24} Id. at 7.

\textsuperscript{25} As this review has already pointed out, Estrich also wants the reader to understand how motherhood affects working women, and difficulties upwardly mobile women may have in the political arena.

\textsuperscript{26} Estrich makes two primary points in the chapter, On Being Extraordinary. First, she points out that women who want to succeed should know that they must be "...extraordinary, different from other women, better than men." Id. at 34. Second, she points out that "[b]eing extraordinary only takes you so far." Id. at 45. Extraordinary women face obstacles because they are women and, consequently, extraordinary women have a special need for support from other extraordinary women. Id.

\textsuperscript{27} In the chapter entitled Equal Under the Law, Estrich presents a review of some landmark gender discrimination cases and anti-discrimination statutes. For instance, she highlights Hoyt v. Florida, 368 U.S. 57 (1961), a case in which an abused spouse who killed her husband with a baseball bat during a fight was convicted by an all-male jury. On appeal, Hoyt argued that women should not have been excluded from the jury. The United States Supreme Court rejected her argument. In upholding the conviction, the Court pointed out that women belong at home, not in the public domain as jurors. Id. at 61-62. Estrich explains that Hoyt's message is that "...in the public sphere, women are neither the same as, nor are they equal to, men, nor is their voice needed in making judgments or shaping rules." Sex & Power, at 59. Estrich argues that background cases like Hoyt set the stage for
power elite,28 (4) ways in which sex role stereotyping affects women who are trying to make it to the top tier,29 and (5) how the use of sex appeal to gain power is a double-edged sword.30 Estrich assumes that if women have increased knowledge, this knowledge will inspire them to change their behavior.

Another important theme Estrich weaves throughout the book is that the most significant factor that prevents women from becoming top-tier women is that they are making poor or uninformed choices that prevent them from reaching their potential. She discusses several bad choices women are making today, including (1) women with children are giving up on the corporate fast-track without realizing they are resigning themselves to a lifetime of jobs in which they will be undervalued, underpaid, and relatively powerless,31 (2) they are often striving to be good, non-confrontational girls, when more aggressive behavior would increase the likelihood of upward mobility,32 (3) women are also failing to celebrate modern obstacles women face in the public sphere. Id. at 58. Although the Supreme Court changed its mind in 1972 and ruled that men and women should be treated equally, even in the public sphere, a history of inequality under the law shapes our current culture. See id. at 59.

28. In the chapter entitled The Facts of Life, Estrich strives "to shock the complacent who think feminism is unnecessary in the twenty-first century." Id. at 70. She attempts to do so by presenting statistics that show that "[t]he power elite [in corporate America] remains overwhelmingly white, male, and Protestant, even though individual women, blacks, and Hispanics have gained entrée." Id. at 81. She also praises the head of the independent school her children attend, Reveta Bowers, and points out that Bowers is the only African-American woman on Disney's board. Id. at 86-87. She points out that Michael Eisner's children attended the same school as Estrich's, and he, too, was impressed with Bowers. Id. Apparently, she is using Bowers as an example of how difficult it is for African-American women to get tapped to positions of power on corporate boards. It is important to note that this is one of just two significant anecdotes in the book in which Estrich mentions race. The other anecdote explains that a black man raped Estrich. Id. at 171.

29. Estrich's chapter The Comfort Factor points out that men want women in their midst who make them feel comfortable. Id. at 120. Generally, men feel comfortable with women who meet the norms for their gender. For instance, Estrich states that one "senior man" told her that his vision of the ideal woman is one who "is married but has no children; attractive, without being too sexy; strong, but not too tough; ambitious, but not too aggressive." Id. at 123. Estrich explains that "[w]hat makes the men most comfortable is women who don't challenge them, not women who do; women who aren't like them, not women who are." Id. at 136.

30. In the chapter entitled Sexual Power, Estrich covers a broad range of topics, from Monica Lewinsky, to the rape she experienced twenty-five years ago, to a recent law student who wore a miniskirt and no blouse under her jacket to a job interview. Id. at 165-213. The best example of how women win and lose by using their sexual power relates to Estrich's role as a "television pundette." Id. at 207. She realizes that her blond hair and relatively good-looking legs may be an important part of her success but, even if this is true, "...sexuality takes you only so far." Id.

31. Estrich writes, for instance, "Most professions are not organized to accommodate a woman's biological clock. . . . It is way too difficult to take time off to have a family and then come back and have a chance to fulfill your potential. The problem with the 'mommy track' isn't that it represents a detour. A detour would work. The problem is that it's a dead end." Id. at 28.

32. Estrich struggles with this poor choice frequently. She describes her hatred of both conflict and confrontation. Id. at 241, 222. She points out that she often makes the mistake of wanting to be liked, rather than accepting that if she is as aggressive as she should be, other people might view her as an "ambitious chick," rather than a team player. Id. at 222. She gives an example of a time when she
ambition and embrace ambitious women, and, finally, (4) women are failing to realize that their own efforts to climb to higher levels will yield better lives for both themselves and others.

Although Estrich believes that individual choice is the primary factor holding women back, she makes note of other obstacles, including informal barriers, stereotyping and discrimination. But, because Estrich views individual choice as women's primary obstacle to upward mobility, it is not surprising that her agenda for change includes suggestions women can control. If women change, equality will emerge. In the last chapter, "Changing Ourselves," Estrich looks at her daughter, who recently dared to join little league baseball even though few girls tried out, and she was the only girl on her team. Then, Estrich uses this anecdote to express her vision for the future. She writes that her daughter "had a mission, and she fulfilled it." She reminds the reader that "'[t]he name of that mission is feminism. Its gift is the idea that a girl can be whoever she wants, that she too can grow up to be president. Its gift is the faith that both my children—my daughter and my son—can be free to be their best selves. But with the gift comes the responsibility to fulfill its promise, to stand up as a woman, if not for your own sake, then for the sake of those who come next." She

looked out for the interests of a male co-worker who did not reciprocate. Id. at 257-58. In criticizing her initial kindness, she writes, "What a wonderful person I was. What a girl." Id. at 258.

33. Estrich writes, "But motherhood doesn't need a movement anywhere near as desperately as ambition does. Hallmark celebrates women who are mothers; who celebrates women who want power?" Id. at 245. Estrich defends Hillary Clinton's ambition, then scolds women who criticize her. Id. at 235-39. She writes, "Instead of seeing our common agenda, we are eating our best alive." Id. at 239.

34. Estrich asks whether women still have the ambition to promote change. Id. at 263. Then, she argues in favor of "a special kind of ambition, an ambition for something larger than one's own success. ... To enjoy life, yes; but also to make a difference." Id.

35. Informal barriers are unwritten customs within organizations that work to the advantage of some, especially men. For instance, that men transact business on the golf course and often fail to make women feel welcome at golf outings would be an example of an informal barrier. Estrich addresses this particular informal barrier and encourages readers to teach their daughters to play golf. Id. at 121. She realizes, though, that the older generation may be doomed, as it may be too late to learn golf. Id. Estrich ignores an important barrier that holds many women back: glass walls. The metaphor refers to lateral barriers that prevent employees from seeking the kinds of jobs that lead to promotions. Shelia Wellington, Catalyst's President, calls women's lack of access to line jobs as glass walls. Line jobs are "revenue-generating jobs that lead to the executive suite." See Shelia Wellington, Advancing Women in Business: You've Come A Long Way—Maybe!, 65 VITAL SPEECHES OF THE DAY 637, 638-39 (June 1999).


37. See infra notes 46 & 48.

38. SEX & POWER, at 265.

39. Id.

40. Id.

41. Id.
THE POWER PYRAMID says, “We [women] stand for the day when we don’t have to,” and that “feminism is a lesson in the possibilities of being a truly autonomous person.” At the book’s finale, she expresses an appreciation for the role law has played in women’s progress to date. Still, Estrich states that the world has not changed completely, and, consequently, women must work together to “finish the job.” In essence, individual women need a new attitude—one that shows respect for the power of solidarity to promote positive change.

II. THE MULTICULTURAL POWER PYRAMID

Sex & Power presents an appealing argument, especially to relatively powerful top-tier and middle-tier white women. Estrich’s conversational tone invites the reader to see the world as she sees it, and some subgroups of women are likely to feel a strong sense of camaraderie with Estrich. For relatively powerful white women who believe the primary obstacle to complete equality is personal choice, combined with occasional and sometimes serious problems related to informal barriers, stereotyping, and individual discrimination, Estrich’s book may indeed serve as a rallying cry. Estrich’s call to arms may strengthen the desire and ability of some women to develop the new attitude Estrich advocates.

Unfortunately, Sex & Power is much less likely to appeal to readers who are unwilling to accept Estrich’s assumptions that (1) poor or uninformed choices women make are the primary obstacle to their upward mobility and (2) women have experienced a common oppression. Regarding the first assumption, some readers are likely to believe that discrimination is institutionalized. If discrimination is institutionalized,

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42. Id.
43. Id.
44. Id. at 266.
45. Id. Estrich writes, “Know that the law is on your side and that much of what was once considered acceptable no longer is; understand that revolution is possible, that we have already changed the world, and all we have to do is finish the job.”
46. Individual discrimination is a “result of isolated prejudiced individuals” who make inappropriate decisions about who gets the organization’s rewards (e.g., the job, the promotion, the admission into a particular program). Myra Marx Ferree & Julia McQuillan, Gender-Based Pay Gaps: Methodological and Policy Issues in University Salary Studies, 12 GENDER & Soc. 7, 9 (1998).
47. For a book that focuses on the different forms of oppression subgroups of women in the United States have experienced, see TERESA AMOTT & JULIE MATTHAEI, RACE, GENDER & WORK: A MULTICULTURAL ECONOMIC HISTORY OF WOMEN IN THE UNITED STATES (1996). Amott & Matthaei write, “Women throughout the United States have not experienced a common oppression as women.” Id. at 27. This statement sets the stage for the book, which analyzes women’s works through the “intrinsically interconnected . . . concept[s] of gender, race-ethnicity, and class . . . .” Id.
48. Institutionalized discrimination is a form of discrimination that is difficult for individuals in organizations to see because it is “built into patterns of behavior.” Ferree & McQuillan, supra note 46,
improved individual choices will not promote significant change. Regarding the second assumption, readers who see a world in which women differ significantly from one another will be less likely to feel inspired by Estrich's rallying cry. Some readers will question both assumptions. They will point out that judicious individual decision-making does not take every women to her desired location on the pyramid. For example, lesbian and/or African-American women may believe discrimination and stereotyping are their primary obstacles to advancement.

Estrich's decision to ignore the significance of differences among women is evident in her refusal to engage in serious reflection about her own privilege. Estrich is aware that some readers may want her to acknowledge the privilege she enjoys as a heterosexual, white, upper-class woman. Estrich responds to potential criticisms along these lines in one of the most interesting parts of the book. In a special "Note," Estrich writes:

There are many issues that I don't make any claim to addressing in this book. The intersections of sex and race, and sex and sexual orientation, raise issues that cannot be dealt with in a shorthand way, and while some of the questions raised are similar to those addressed here, the more important point is that many are not. If Professor Kimberle Crenshaw is right that the most privileged subgroup within a discriminated-against group tends to fare best—heterosexual, white, middle-class women being her prime example—then it is significant that this subgroup has not indeed fared as well as might be expected and is not in the position to help the less privileged as much as many of us would expect they should.50

In this note, Estrich sets the stage for the narrow focus of her book. She is writing for top-tier women, inspiring them to help middle-tier women. Estrich assumes top-tier women do not need to explore the rich intersections of race, gender and class to help middle-tier women, who will in turn help bottom-tier women, who will in turn help powerless women. Given Estrich's understanding of the power pyramid, an important question is: Can Estrich inspire middle-tier women to help those beneath them on the power pyramid if she ignores issues related to race, class, and sexual orientation?

Perhaps the best answer to this question is that it depends. Apparently, Estrich assumes her readers are a lot like her, only younger and less powerful. If their demographic traits are similar to hers, they might not

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49. Id. at 8. This form of discrimination is woven into institutional practices that yield patterns of rewards for employees. These patterns are shaped by "shared expectations about who deserves what." Id. at 8. When discrimination is institutionalized, organizations cannot point to specific individuals whose behavior shows prejudice. Instead, all employees shape discriminatory practices.

50.SEX & POWER, at 269. Estrich then cites the growing literature on issues of race and sex, and lesbian feminism, noting such authors as bell hooks, Patricia Hill Collins, Kimberle Crenshaw, Adrienne Rich, and Patricia Cain. Id.
notice that Estrich envisions a power pyramid in which women are relatively homogeneous. If middle-tier women are diverse in terms of gender, race/ethnicity, class, age, sexual orientation, and religion, they may be less likely to find Estrich's words inspiring. Some women will not feel a sense of solidarity and mutual dependence when leaders at the top of the pyramid, such as Estrich, ignore the different forms of oppression subgroups of American women have endured.

Unfortunately, Estrich never describes women who are below her in the pyramid in terms of their demographic traits, life experiences and philosophies, value priorities, or preferred definitions of feminism. She cites few books written by writers who highlight differences among women in terms of gender, race-ethnicity, class, age, sexual orientation and/or religion. The closest Estrich comes to describing women at any level of the pyramid is when she cites statistics from Catalyst, a nonprofit organization that counts and surveys women in high-level positions in corporate America. Although Catalyst's statistics give the reader an idea of how many women are making it to high-level positions in corporations

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51. See generally AMOTT & MATTHAEI, supra note 47, for an example of writing that differentiates economic differences among women. Amott and Matthaei point out that a wide range of factors affect women's working lives. Id. at 11. In their book, however, they discuss gender, race-ethnicity, class and more than age, sexual preference, and religion. Id.

52. Again, consider AMOTT & MATTHAEI, supra note 47, who introduce their book by pointing out that "[u]nfortunately, the ties which have joined [women] have rarely been mutual, equal, or cooperative; instead, our interdependence has been characterized by domination and exploitation." Id. at 3. These authors go on to say that "...an emphasis on difference can lead to solidarity, a commitment to stand with those different from us against all forms of social and economic injustice." Id. at 28.

53. See TONG, supra note 21.

54. See generally AMOTT & MATTHAEI, supra note 47.

55. Id.

56. Id.

57. For an excellent exploration of clashes among workers of different generations, see RON ZEMKE, CLAIRE RAINES & BOB FILIPCZAK, GENERATIONS AT WORK: MANAGING THE CLASH OF VETERANS, BOOMERS, XERS AND NEXTERS IN YOUR WORKPLACE (2000). For books about how younger women may view the feminist revolution, see JENNIFER BAUMGARDNER & AMY RICHARDS, MANIFESTA: YOUNG WOMEN, FEMINISM, AND THE FUTURE (2000); see also, THIRD WAVE AGENDA: BEING FEMINIST, DOING FEMINISM (Leslie Heywood & Jennifer Drake, eds. 1997).

58. See generally GERALD V. MILLER, THE GAY MALE'S ODYSSEY IN THE CORPORATE WORLD: FROM DISEMPLOYMENT TO EMPowerMENT (1995). Miller notes that the U.S. Department of Labor's 1991 composite of the glass ceiling and barriers that hold employees back focused on women. Id. at 5. He writes that "[t]he movement to accept gays and lesbians is virtually nonexistent except for pockets such as Levis, Apple, and Microsoft." Id.


60. For a comprehensive review of Catalyst's work, see generally CATALYST, ADVANCING WOMEN IN BUSINESS—THE CATALYST GUIDE: BEST PRACTICES FROM THE CORPORATE LEADERS (1998).
and organizations, and the factors women\textsuperscript{61} and men\textsuperscript{62} believe are holding top- and middle-tier women from achieving the highest levels of organizational hierarchies, these statistics make little attempt to tease out differences among women.\textsuperscript{63}

Estrich may be right that her audience is a lot like her, only younger and less powerful. A quick look at bookstore shelves suggests that middle-tier women who buy books about the glass ceiling are more likely to demand books that tell them how to make better choices\textsuperscript{64} than books that describe institutionalized discrimination and/or explain intersections among race, gender and class.\textsuperscript{65} However, it is likely that Estrich is wrong about who needs to hear her message.\textsuperscript{66} She must broaden her thesis if she wants to lead the charge toward increased equality for all women. She must

\begin{itemize}
\item \textsuperscript{61} Catalyst’s study of women in corporate leadership concluded that women believe that “male stereotyping” and “exclusion from informal networks” are the most likely barriers to hold women back. See Wellington, supra note 35, at 638.
\item \textsuperscript{62} Catalyst’s study showed that CEOs did not agree with women about the primary barrier holding them back. The CEOs believed the to most important factors holding women back are “lack of management experience” and that women “haven’t been in the pipeline long enough.” Women simply lack the right kind of experience. \textit{Id.}
\item \textsuperscript{63} Catalyst has, however, conducted and published one study that explores the experiences of women and color. \textbf{CATALYST, WOMEN OF COLOR IN CORPORATE MANAGEMENT: OPPORTUNITIES AND BARRIERS} (1999). Catalyst’s study indicated that although many people believe women of color may be doubly advantaged in corporate America due to diversity goals, the reality is that women of color are “vastly under-represented in the managerial workforce. . . . \textit{W}omen of color do not perceive their advancement opportunities . . . to have been as favorable as those of white woman [sic].” Wellington, supra note 36, at 639.
\item \textsuperscript{64} Several recent self-help books tell women how to make better choices. \textit{See, e.g.,} CAROL GALLAGHER WITH SUSAN GOLANT, \textit{GOING TO THE TOP: A ROAD MAP FOR SUCCESS FROM AMERICA’S LEADING WOMEN EXECUTIVES} (2000) (Gallagher, who holds a doctorate in organizational psychology, and Golant, a writer, develop their road map for success for women executives based upon in-depth interviews with over 200 women who have made it within two steps of CEO at America’s Fortune 1000 companies. This book provides practical advice for women who want to forge their way to the top); \textbf{ESTHER WACHS BOOK, WHY THE BEST MAN FOR THE JOB IS A WOMAN: THE UNIQUE FEMALE QUALITIES OF LEADERSHIP} (2000) (Book, a former reporter for \textit{Forbes}, explains to women how to use female qualities of leadership to move up into leadership roles); \textbf{VIRGINIA O’BRIEN, SUCCESS ON OUR OWN TERMS: TALES OF EXTRAORDINARY, ORDINARY BUSINESS WOMEN} (1998) (O’Brien, a freelance writer, wrote this book because she was tired of negative stories about the glass ceiling and wanted to write a more positive account of what women are achieving in the American workplace. She challenges the definition of “success” that focuses on how high women have climbed on the corporate ladder and celebrates other kinds of success, especially success as individual women define it for themselves).
\item \textsuperscript{65} One of the best books written for a sophisticated but general American audience that shows an appreciation for a multicultural pyramid is \textbf{JOAN WILLIAMS, UNBENDING GENDER: WHY FAMILY AND WORK CONFLICT AND WHAT TO DO ABOUT IT} (2000). Williams presents an informed, insightful argument that employers design work around the concept of an ideal worker, and that many employer designs are discriminatory under Title VII. \textit{Id.} at 4-6. Ideal workers do not make spending time with family a priority, work full-time (and often overtime), and can move if the job requires it. \textit{Id.} at 5. Williams argues that “[m]any individual workplaces designed around masculine norms exclude a disproportionate number of women in violation of Title VII.” \textit{Id.} at 113. \textit{See also generally AMOTT & JULIE MATTHAEI, supra note 47.}
\item \textsuperscript{66} It seems unlikely that the majority of those below Estrich in a power pyramid are white, heterosexual, upper-middle class women.
consider the possibility that an emphasis on, rather than avoidance of, a serious exploration of issues related to diversity can lead to solidarity.\textsuperscript{67}

Estrich repeatedly points out that feminism is all about rewriting questions.\textsuperscript{68} Her current central question is: How can women work together to promote change and individual freedom for all women? In rewriting her own central question, she might consider asking herself and other advocates these sub-questions: What role can men play in the process of promoting change?\textsuperscript{69} What differences among subgroups of women must top-tier women understand before they can start the process of helping hands? To what extent does institutionalized discrimination still exist in organizations today, and how might remedies that combat institutionalized discrimination differ from those that fight individual discrimination? How might upper and middle-tier women \textit{empower} rather than \textit{help} bottom-tier and powerless women? In what ways are powerful women oppressing other women? Readers of this review who see the fundamental flaw in Estrich's work, that she does not see the complicated nature of power pyramid, should not be quick to dismiss her work.\textsuperscript{70} Estrich has a considerable amount of power—the power to change the rules for others.\textsuperscript{71} Estrich has access to the media through her syndicated column and her guest appearances as a television pundette.\textsuperscript{72} Estrich's critics must also acknowledge the power of Estrich's message, which is a variation on the "pull yourselves up by your bootstraps" theme.\textsuperscript{73} This message is simple, and taps into the individualism that underlies the American ideology.\textsuperscript{74}

\textsuperscript{67.} See \textit{Amott \& Matthaei}, \textit{ supra} note 47, at 28 ("... an emphasis on difference can lead to solidarity... ").

\textsuperscript{68.} See, \textit{e.g.}, \textit{Sex \& Power}, at 50 ("Sometimes the only stance that makes sense is to refuse to accept the choices placed in front of you; to opt to rewrite the question, rather than answer the one posed); see also id. at 148 ("Asking the questions will produce the agenda. Feminism in action.").

\textsuperscript{69.} For a book that explains why men might want to be part of the change process, see \textit{Anthony J. Ipsaro, White Men, Women \& Minorities in the Changing Workforce} (1997). Ipsaro, a psychologist, believes it is in men's self interest to care about diversity in organizations, in part because giving up power opens the possibility for more meaningful connections with a wider range of people in organizations.

\textsuperscript{70.} Readers who are angry with Estrich may want to recall this statement by Audre Lorde: "...the strength of women lies in recognizing differences between us as creative, and in standing to those distortions which we inherited without blame but which are now ours to alter. The angers of women can transform differences through insight into power. For anger between peers births change, not destruction, and the discomfort and sense of loss it often causes is not fatal, but a sign of growth." Audre Lorde, \textit{The Uses of Anger}, \textit{Women's Stud. Q.}, Fall 1981, at 7, quoted in, \textit{Amott \& Matthaei}, \textit{ supra} note 47, at 28.

\textsuperscript{71.} See \textit{supra} text accompanying note 1.

\textsuperscript{72.} See \textit{supra} note 30.

\textsuperscript{73.} For a review of individualism as a core part of the American ideology, see generally \textit{Everett Carll Ladd, The American Ideology: An Exploration of the Origins, Meaning, and Role of American Political Ideas} (1994).

\textsuperscript{74.} See id.
To achieve the solidarity Estrich desires, however, she must reflect on the multicultural nature of the power pyramid. She is obviously bright and capable of re-imagining the pyramid. The question is whether she will choose to do so. One of the most appealing aspects of *Sex & Power* is Estrich’s willingness to explore her own weaknesses.\(^{75}\) It is possible she will realize that her potential as a leader of a stalled feminist revolution is much greater if she explores rather than ignores differences among subgroups of women. Estrich’s book makes clear that Harvard and feminism were the two primary forces that shaped her worldview.\(^{76}\) It is possible that the experience of studying the work of scholars like Kimberle Crenshaw who write about the rich intersections among gender, race and class could reshape and update Estrich’s worldview. If so, she could indeed lead the charge for positive change for all women. What makes this change unlikely is that the ideas and experiences that shaped Estrich’s core life philosophy occurred decades ago. Events that happened more recently, such as motherhood, did not seem to affect her as profoundly as events and ideas she experienced as a woman in her twenties. It is possible that Estrich’s power is limited by her lack of openness to views and experiences unlike her own.

IV.
CONCLUSION

Perhaps the power pyramid is not as Estrich assumes in *Sex & Power*. Imagine a power pyramid in which power is defined by appreciation of the rich intersections between race, gender and class. In this pyramid, Estrich is not at the top. Instead, she is a middle or bottom-tier woman. Top-tier women and men in a pyramid that reflects multicultural awareness could lend a helping hand to Estrich as she strives to rise to the top. Perhaps, too, as a show of solidarity and mutual dependence, she could pass to them some of the power she enjoys in the more traditional pyramid that Estrich describes in her book. She has the power to pave the way so that new voices can gain access to the podium, the syndicated column, and the seat in pundette row. Through this revised process of helping hands, Estrich may get her wish—she may play a key role in using her power to promote change for all women.

\(^{75}\) See supra note 32.

\(^{76}\) See *SEX & POWER*, at 264-265.