The great 19th century British jurist, James Fitzjames Stephen, writes the following in *Liberty, Equality, Fraternity*:

“A woman marries. This in every case is a voluntary action. If she regards the marriage with the ordinary feelings and acts from the ordinary motives, she is said to act freely. If she regards it as a necessity, to which she submits in order to avoid greater evil, she is said to act under compulsion and not freely.” But no, Stephen argues, the woman who marries from “necessity” or to “avoid a greater evil” acts just as voluntarily and as freely as the one who chooses “from the ordinary motives” and with “ordinary feelings.”

In putting forth his argument, Stephen rejects the position “accepted by Mr. Mill.” He was referring, of course, to John Stuart Mill, who contended in *On Liberty* that a woman who marries or otherwise acts from a fear of the consequences of choosing differently is acting under “compulsion,” such that “no one is ever justified in trying to affect any one’s conduct by exciting his fears.”

This exchange came to mind while reading a recent essay in the *Journal of Legal Education* by Robin West, a law professor at Georgetown, entitled “Consensual Sexual Dysphoria: A Challenge for Campus Life.” She explores the question of why charges of sexual assault on campuses have proliferated in recent years. West begins with the concept of consent, which marks the distinction between sex that is voluntary, or not. She concedes that a “voluminous literature spanning several decades addresses the troubled relationship of consent or non-consent to rape,” and that the controversies surrounding consent are still unresolved. This makes it difficult to sort out when sex should be sanctioned or penalized, either by college administrators or by the law.

Robin West tries to clear through the thicket by shifting her attention away from “nonconsensual sex on campus”—that is, away from “rape and sexual assault”—to “something that our conversations about nonconsensual sex have often marginalized.” She explains that she is talking about sex “that is fully consensual and entirely non-assaultative, but unwanted, or not mutually desired by both partners.” West’s goal is to distinguish between sexual encounters for women that are libidinous—which a woman desires and physically enjoys in a specifically sexual way, and presumably pursues at least partly for that reason—and sexual intimacies a woman engages in despite an absence of sexual lust or enjoyment. (Because West’s term “unwanted” is ambiguous and potentially confusing, I substitute the term “undesired” for what West has in mind: sex not impelled by physical desire nor bringing about sexual pleasure).

West goes on to observe what most women who have been heterosexually active for any part of their lives know: “girls and women—and sometimes but less often men and boys—consent to sex they do not want, do not welcome, do not desire, from which they do not anticipate feeling any pleasure, and from which they feel no

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pleasure.” She observes that the focus on “coercion” and “consent” in discussions of sexual assault, at college and elsewhere, has tended “at best to marginalize and at worst to legitimate these quite widespread experiences” of women engaging in undesired sex.

She then asks why women do consent—why they volunteer, or at least appear to volunteer, for sexual encounters that they know or suspect will bring no pleasure. She speculates that they do so “for any number of deeply familiar, although rarely discussed reasons.” She argues that undesired sex is uniformly harmful to women and that we should work for a world in which it is minimized or eliminated.

Turning to the sexual experiences of college women, West asserts that sex without physical enjoyment is not uncommon on campuses today, and in fact is perhaps more common than ever. She explains that the current sexual climate, and especially the “hook-up” culture of casual sexual encounters, increases the risk that women will engage in the type of sex she considers harmful—that is, without lustful desire.

It is a fair bet that, for most of history, undesired sex was a common, if not a constant, feature of female existence, the rule rather than the exception.
A woman’s sexual feelings, however, are not. We may never know how many women are with men who don’t turn them on. That we may never know doesn’t mean it doesn’t happen.

Why don’t we know more? The topic of sex without lustful desire is elusive and little written about. One might even conclude that it is taboo, perhaps because a “meh” sex life is nothing to boast about, especially in the current day and age. Older sources are not much better. Although no literary expert, I can recall no work of fiction that revolved around the topic. Certainly the celebrated American novelists, including men such as Roth, Bellow, Updike, and Mailer, were hardly concerned with women’s subjective sexual feelings, let alone whether the object of their desire shared their eager excitement. Another angle is the medical. A petition to the FDA urging approval of Addyi, a drug designed to address women’s low libido, gathered more than 60,000 signatures despite tests showing the drug was no better than a placebo. The Internet chatter surrounding Addyi reveals an underworld of distress that has frustrated all pharmaceutical attempts to relieve it.

Another source on the topic is The Bitch is Back, a recently published collection of essays by middle-aged women who had earlier contributed to a volume entitled The Bitch in the House. Although replete with mind-numbingly banal, all-about-me musings on life and love, the later essays are revealing in displaying a dizzying range of attitudes towards sex, from an obsession with getting more of it to a determination to have less. In “Still in the Heart,” Hazel McClay describes how she fell in love with a man for whom she felt little sexual desire. What followed was a decades-long, otherwise-happy marriage of low sexual intensity and mutual physical avoidance. Another chapter, entitled “Once a Week,” describes a marriage in which the author’s interest fell far short of
her husband’s. Although she schemed constantly to avoid sex, the marriage endured for many years. Yet other chapters tell tales of sexual obsession and deprivation. A femme seule nearing 60, wishing and waiting for the burning embers to subside, reminisces about a short-lived but intense liaison “that found her smiling years later.” Regrett ing the lack of passion in her present life, she poignantly declares that “desire heightened the senses, destroyed the routine, could make you alive in a way that nothing else did. What could possibly be its equal?”

What about younger women? Although I could find no comparable set of writings by them, poking around on Internet “sexpert” sites revealed a steady, low-level hum of complaints about unsatisfying sexual encounters and lack of desire, whether in one-night stands, dating situations, or long-term relationships. Exhausted young mothers appeared regularly. The advice was mostly disappointing or useless—cursory and medicalized, consisting mostly of “see your doctor or therapist.”

From this haphazard set of sources emerges a picture of female libido as a complicated, mysterious business that resists a systematic understanding of its vagaries, triggers, and circumstances. One cannot escape the conclusion that confirms what we already know: Female sexuality is mercurial, unpredictable, and radically contingent. Which is not to deny the intensity of female sexual passion. There have always been and will always be Francescas pursuing Paolos, Didos longing for Aeneases, and Marianas in the moated grange. And some male traits—looks, confidence, power, wealth, talent—surely excite female urges more than their opposites.

On this, women differ from men. The old-fashioned word on the street, the stereotypical law of averages, is that men’s desire is more straightforward and indiscriminate, and less circumstantial, than women’s. The cartoon of two side-by-side machines, one male and one female, shows the man operating with a simple “on-off” switch, while the female requires a complicated set of knobs, dials, toggles, and joysticks. Also widely assumed is that men are more recklessly eager—hornier—than women. Socio-psychological investigation backs up this picture. In one experiment, most male college students, but few female ones, agreed to go home with an opposite-sex stranger who approached them on campus requesting sex.

How do these observations bear on today’s college scene? There is no simple formula for when sex for women is pleasant or unpleasant, welcome or unwelcome, desired or undesired, awful or sublime. It depends. But there are some verities we ignore at our peril. Historically, young women have been sheltered, restricted, and protected from men for a range of reasons, including to safeguard their sexual innocence and to minimize the birth of out-of-wedlock children who place burdens on the community. That many women experienced these restrictions as stifling, limiting, and oppressive has led to their relaxation over time. But this development has removed most of the buffers that have protected women from relentless male pressures for sex. At least in modern Western societies, women now must fend for themselves in the sexual marketplace. Although bringing many benefits, this regime also carries costs.

In fact, the conventions surrounding sex for adolescent girls and young women have changed dramatically over the short period of my lifetime (I am 64), with current norms and expectations differing sharply from what I and my peers experienced. In my high school in upstate New York, middle-class girls like me were expected to remain virgins. I never heard my girlfriends complain about this, or even question it, and no one appeared to experience it as a deprivation or loss. At least they didn’t say so. The boys knew the rules too and didn’t really press the matter beyond the accepted limits, or did so half-heartedly with no real expectation of success. I recall one boy, who thought himself a sophisticate, pushing particularly hard. Lucky for me, I didn’t much fancy him.

As far as I can tell, the cartel of “no sex, we’re adolescents” pretty much held. Only one girl I knew got pregnant, by a local college boy (dear reader, she married him), and no one “went away.” We certainly obsessed about boys, and talked about them constantly. But our obsessions didn’t seem particularly sexual, undoubtedly because we had little idea of what we were longing for.

Music camp, though, was different. The girls there, mostly from New York City high schools, were “fast.” I regarded them with alarm, and not a little revulsion. I thought them reckless, and wondered what they were thinking. But, let’s face it, I was a rube—naïve, inexperienced, and cautious by nature and upbringing.

My high school experience influenced my outlook on adolescent sexuality for decades, and still does. It all seems so unnecessary. Do 15, 16, or even 17-year
old girls really need to have sex? No doubt many would consider this attitude quaint, simple-minded, and pleasure-denying. And I concede my girlfriends and I gave little thought to the effect of our norms on boys, who may have had a different take on the whole thing. But that was the point. We didn’t really care about how the boys felt about it, because we didn’t have to. Society protected us. We went to dances and parties. We bowled, skated, attended football games, and watched reruns of “The Twilight Zone.” We had fun. Despite the rules, or perhaps because of them, we didn’t lack for male attention.

After high school, things changed. When I arrived at Yale in 1971, young freshmen got the message that we were expected to lose our virginity within the year. But even in that liminal period things were different, and better, than they are now. Some hoary parietal rules were still in effect, at least for a while. Men could not visit freshman women’s rooms without their permission. The flow of alcohol was kept within bounds. Dating and courtship conventions still lingered. Men were more patient, and that patience bought time. Speed bumps like “well, I hardly know you” often worked, at least for a while, without the loss of a man’s interest or attention. The presumption of “no, at least not yet”—although defeasible, and not infrequently defeated—gave women shelter and more control over when and if a sexual relationship would happen. The situation was, as they are wont to say, “empowering.”

What is life like today for young women? According to Kathleen Bogle, the author of Hooking Up: Sex, Dating, and Relationships on Campus, sex at college today is dominated by a “hook-up” culture that plays by a very different set of rules. Under the conventions and rituals of this culture, sex is a short-lived physical sensation, a momentary, emotionless coupling of bodies. Hook-up sex, in the words of Mark Regnerus, is the quintessential “cheap sex”—sex without affection, expectations, or hope for a long-term future, or at least something more. Most importantly, college women now have far less protection from a man’s sexual expectations, and less chance to get to know him before giving in to them. The hook-up culture has turned instant sex into the currency with which male attention, however fleeting, is bought. Camille Paglia, in a recent interview about Hugh Hefner, summarizes it well. What has almost vanished from college life, she says, is “a man, behaving in a courtly, polite and respectful manner, [who] pursues a woman and gives her the time and the grace and the space to make a decision of consent or not. . . . Today, alas, too many young women feel they have to provide quick sex or they’ll lose social status. If a guy can’t get sex from them, he’ll get it from someone else. There’s a general bleak atmosphere of grudging compliance.”

So why do young women “comply” with the dominant expectations? And is Paglia right to describe the atmosphere as bleak and grudging? Surely some hooking up is mutually libidinous, with sexual thrills on both sides. (The women who experience the thrills, one surmises, are not the ones complaining.) But for other women, it’s less fun than for men. Data gathered by NYU sociologist Paula England at Indiana University and Stanford reveals an “orgasm chasm,” with college men reporting twice as many orgasms as women overall, and a gap for hook-up sex that is far wider.

In short, hooking-up, with its conventions of sex without strings or preliminaries, creates fertile ground for sex that women don’t really desire. But regardless of whether and how often women are impelled by genuine lust or physically enjoy themselves, it does not follow that they are being forced to participate, or have no reasons for doing so. The feeling of being attractive and wanted, the prospect of sexual adventure, the warmth of physical closeness, the satisfaction of commanding a man’s attention, the benefits of joining in an approved social ritual, the release that comes from the extreme inebriation that goes with the sex, the desire to have something to talk about with your friends, and the quest to escape boredom, anxiety, academic pressure, and aloneness—all are surely in the mix. While women may be motivated by all or some of these, one thing is certain: They don’t do it for love, or even the prospect of any lasting emotional bond. Hooking up, by definition, leads nowhere.

What is the relevance of this supposed surge in undesired sex to the rise in allegations of sexual assault on campus? Robin West believes there’s...
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a link. The campus “hook-up” culture has created a rough, competitive marketplace in which women are impelled to rush headlong into superficial, short-lived physical intimacies as the condition for social popularity and the company of the opposite sex—intimacies they may not really find physically stimulating or emotionally satisfying. Although real sexual assault does undoubtedly occur on campus—most often against victims inebriated to virtual unconsciousness—the standard encounters giving rise to accusations, although often drunken, frequently appear to be voluntary. Yet women see fit to file complaints about them, and that is what needs explaining. Woody Allen said that “even when it’s bad, it’s good,” but that seems less true for women than for men. It’s a safe bet that women suffer more from “bad sex” than men—from sex that doesn’t feel right, that brings disappointment and regret, that engenders little happiness, pleasure, or satisfaction. As Naomi Schaefer Riley reports in a recent review of Mark Regnerus’s Cheap Sex, studies consistently show that while men tend to rue their failure to have more sex, women are more likely to regret the sexual encounters they’ve had.

The problem might be sex without desire, or it might not. Even if sex feels libidinous, the lack of emotional content can still make hooking up distressing. If women are having sex that doesn’t bring much pleasure, or that is not the result of “ordinary motives” or “ordinary feelings”—whatever those might be—we shouldn’t be surprised that the rhetoric of sexual assault on campus is a confusing mash-up of labels and charges that are almost impossible to keep straight. As with James Fitzjames Stephen’s description of a woman’s decision to marry, the distinctions between what is desired or not, wanted or not, voluntary or not, freely consented to or not, can be murky and ill-defined. In fact, these categories have confounded philosophers and legal scholars for centuries. Certainly most college women are no better at sorting them out than people who do it for a living. For those women, and especially when passions run high, what is undesired can feel unwanted. And what is unwanted can feel coerced. Once those negative feelings well up, a sense of violation will not be far behind. And that sense will attach itself to the object available. What is available today on campus, and encouraged by equally confused college administrators, is a charge of sexual harassment or sexual assault leveled against the male in question. Men and women, and relations between them, are the casualties.

Although arguably related to the surge in sexual assault claims on campus, the phenomenon of sex without desire is hardly straightforward and poses lingering conundrums. Robin West takes the position that undesired sex is always harmful. In the absence of that libidinous urge, women should not have sex. But is that really the right answer, and is it even achievable? What are the “ordinary motives” or “ordinary feelings” from which women should act in deciding to have sex? Which reasons to have sex are benign and acceptable, and which dubious, injurious, or even harmful? What if a woman has sex, as James Fitzjames Stephen puts it, because she “regards it as a necessity” or “to avoid a greater evil” and what might that necessity, or that evil, be? Put another way, what is a good reason and what a bad reason to have sex?

Some social conventions do better than others at protecting women from sex they don’t desire and really don’t enjoy. One might take the position—as I do—that society and the campus culture currently do too little in this regard, especially for adolescents and young women, while at the same time recognizing that completely eliminating sex without desire from all women’s lives is not only impossible, but might sometimes come at too great a price. Surely there are better and worse such encounters, and better and worse societies for minimizing the harms that can flow to women from this experience. Some of the middle-aged women in The Bitch is Back tell us they don’t experience a sexual frisson from every intimate encounter in their lives. The same seems to go for the overwhelmed young mothers who complain on the Internet. Although these women may not feel sexual excitement at the moment, they sometimes do it anyway. Unlike the girls who hook up, they do it for love, or out of gratitude, or as a gift, or to preserve something enduring, lasting, and valuable. In many cases it is a marriage that they seek to preserve, a mostly loving relationship that is central to their lives. But when college women play the hook-up game, what are they trying to preserve or achieve? They want male company and attention, and that’s the only way to get it. It really shouldn’t be that way.