MEDIA COVERAGE OF THE POST TITLE IX FEMALE ATHLETE: A FEMINIST ANALYSIS OF SPORT, GENDER, AND POWER

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I. INTRODUCTION

Sport is one of the most important institutions in American culture. This certainly is demonstrated by the vast resources spent on sport-related enterprises. With respect to discretionary spending alone, billions of dollars are spent annually on the sale of licensed sport products (e.g., baseball caps). In 1992, retail sales of all licensed sport merchandise totaled $12.2 billion.1 In the early 1990s, the top four men's professional sport leagues (football, basketball, baseball, and ice hockey) generated almost $4 billion in revenues.2 Most recently, Anheuser-Busch announced that they had signed a $40 million contract to be the official beer sponsor of the 1996 Olympic Games to be held in Atlanta, Georgia.3 Sport has become such a bedrock of our national psyche that sport figures often come to symbolize larger pressing social concerns such as date rape (Mike Tyson), never-ending and seemingly random acts of violence (Tonya Harding/Nancy Kerrigan, Monica Seles), and spousal abuse (O.J. Simpson).

In spite of the all-pervasive influence of sport, academic scholars have ignored its significance. But if sport is "just a game," why are so much time, money, and cultural support invested in this particular institution? As media scholar Nick Trujillo cautions, the academic study of sport should not be taken lightly as an area of scholarly pursuit.4 Feminist scholars in particular have given scant attention to sport, perhaps because they consider it an activity that belongs to men and therefore has little relevance to women, especially women who embrace a feminist perspective. Such a position is problematic, if not dangerous. "For many

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feminists, sport has, quite rightly, been identified as a supremely male activity and therefore eschewed, both in practice and as a topic of [scholarly] interest. However . . . if we are to understand the processes of our domination, we ignore sport at our peril.  

Although most social scientists have not adequately examined the role of sport in American culture, one academic discipline — sport sociology — has addressed seriously the scope and function of sport for the past two decades. Much of the work in this area involves an increasingly sophisticated feminist analysis of the interconnections among sport, gender, and relational issues of power and domination. Delineating these connections, sport sociologists argue that perhaps more than any other social institution, sport reflects, constructs, and perpetuates beliefs about male superiority and female inferiority. This argument is based on a vision of sport as a potent medium through which biological and physical differences interact with traditional expectations regarding gender. For example, Jennifer Hargreaves argues that physical size and muscularity are essential symbols of male power in Western culture. Because sport is ultimately about physical activity, it provides an arena for producing concrete, everyday examples of male physicality, muscularity, and superiority. The physicality of the male body has represented power and dominance, whereas the physicality of the female body has represented subservience, frailty, and weakness.


We should not underestimate how much sport reinforces fundamental assumptions underlying patriarchal conceptions of gender. Sport is preoccupied with measurable, physical differences between the sexes in which heights, scores, and distances are obsessively recorded and compared. These differences in turn lay the groundwork for the apparently empirical proof that males are physically, and thus naturally, superior to females. This is precisely why sport is so important. Any social institution (and its accompanying set of beliefs) that can claim a biological basis is seen as immutable and therefore impervious to challenge. It is important also to note that constructions of inherent male supremacy in sport are not limited to biological assertions. Often the so-called physical superiority of male athletes becomes equated with social superiority. “Sport reproduces the ideology of male supremacy because it acts as a constant and glorified reminder that males are biologically, and thus inherently superior to females. Ultimately, this physical, biological, ‘natural’ supremacy of males in sport becomes translated into the ‘natural’ supremacy of males in the larger social order.”

Despite efforts to construct sport as an exemplar of inherent male supremacy, much cultural effort and urgency are attached to sport as a masculinizing practice. Perhaps this cultural effort alone belies any notion of biological destiny. “If boys simply grew into men and that was that, the efforts . . . to teach boys how to be men would be redundant.” Many sport sociologists further articulate the theory that sport is an ideological construct, rather than an inherent given. For example, the apparent natural superiority of the male athlete rests upon how athleticism is defined. Superior athletic performance is constructed in ways that privilege certain physical attributes where, on the average, men have an advantage over women. Sports that require muscle mass, strength, and explosive speed are significantly more prestigious in this society than sports that emphasize aesthetic grace and beauty. The overwhelming popularity of football compared to that of gymnastics illustrates the bias of our culture in favor of such traits. However, if superior athleticism was defined as the ability to do a back flip on a balance beam, females would be considered the superior athletes. Because sport consists of a set of ideological beliefs and practices that


11. See id., at 175–76; Kane, Resistance/Transformation, supra note 6, at 192 (citation omitted); Paul Willis, Women in Sport in Ideology, in SPORT, CULTURE AND IDEOLOGY 117, 127, 130 (Jennifer Hargreaves ed., 1982).


are closely tied to traditional power structures, it faces constant challenge and resistance. Dominant ideologies are never uncontested, one-dimensional blueprints that individuals adhere to like simple-minded robots. In fact, one sociologist argues that sport is a site of cultural struggle in which male domination is dependent on the continual reproduction of power relations between women and men.

The remainder of this Article focuses on the nature and scope of this on-going struggle between new definitions regarding female athleticism and the traditional perception of athletics in our society. Part II outlines how the increasing acceptance of women's athleticism over the last two decades has challenged the previously held (and fiercely protected) assumption that sports belong exclusively, or primarily, to men. Part III addresses the critical role the sport media play in this power struggle. Sport sociologists have argued that mass media shape and perpetuate a multiplicity of ideological beliefs. They further argue that, particularly in mainstream media outlets, dominant (i.e., traditional) beliefs often take precedence over other more marginalized beliefs. These arguments are addressed in Part IV. The central issue raised throughout this Article involves how traditional ideologies regarding sport and gender are asserted and perpetuated by the mass media. This is a particularly salient concern given the dramatic and potentially threatening inroads that sportswomen have made over the last fifteen to twenty years. The bulk of the Article, Part V, addresses this latter point by providing an in-depth overview and analysis of research findings in sport media literature. This body of knowledge makes it clear that sportswomen are systematically portrayed as fundamentally different from their male counterparts. Interwoven throughout the literature review in this Article is an analysis of how and why this type of portrayal denies women power in the struggle over who are considered the "real" (i.e., most important) athletes in American culture.

Part VI of this Article shifts attention to an area that is beginning to emerge in sport media literature — overt and covert manifestations of homophobia in media coverage of female athletes. Deeply entrenched and oppressive stereotypes connecting women's sport participation to lesbianism underlies much of the coverage given to sportswomen. This affiliation denies all female athletes status, power, and recognition, regardless of any particular athlete's own sexual orientation. This section concludes with a discussion of the various implications of differential media coverage, such as the containment and undermining of women's full potential, not only as athletes, but also as individuals. Included in this discussion is a call for the media to reflect the reality, rather than the caricature, of women's sport involvement,

15. See generally Margaret C. Duncan & Barry Brummett, Liberal and Radical Sources of Female Empowerment in Sport Media, 10 Soc. Sport J. 57 (1993) (describing how dominant ideologies and practices are resisted, challenged and subverted by individuals who contest the status quo).

16. See generally JENNIFER HARGREAVES, SPORTING FEMALES: CRITICAL ISSUES IN THE HISTORY AND SOCIOLOGY OF WOMEN'S SPORTS (1994) (examining the role sport plays in women's lives, how increased participation by women is changing sport, and the structural forces influencing the participation of women in sport).
as well as an analysis of the ways in which attempts at such social change will be resisted.

II. SPORT AS A SITE OF GENDER STRUGGLE

Historically, definitions of maleness and masculinity were synonymous with conceptions of athleticism. At the same time, traditional notions of what it meant to be a female were in direct opposition to what it meant to be an athlete.\textsuperscript{17} However, in the wake of the 1970s feminist movement, women's roles expanded into many areas traditionally occupied by men. The world of sport was no exception. Since the passage of Title IX in 1972,\textsuperscript{18} "women in the U.S. have had a legal basis from which to push for greater equity in high school and college athletics."\textsuperscript{19} While equality has by no means been fully achieved, a number of substantial gains have been made by female athletes over the last fifteen years.\textsuperscript{20} Today, over two million females participate in interscholastic sports on a nationwide basis compared to only 300,000 before Title IX.\textsuperscript{21} At the intercollegiate level, over one-third of all participants are female compared to only 15% of all participants in the early 1970s.\textsuperscript{22} According to the National Sporting Goods Association, millions of young girls and women participated in organized sports, physical fitness activities, and recreational pursuits in 1993. These activities ranged from exercise walking (43 million participants) to basketball (8.3 million participants) to canoeing (2.6 million participants).\textsuperscript{23} Increased participation rates also have been accompanied by changing attitudes. In the late 1980s a nationwide survey found that the vast majority of parents and children believed that sports were no longer just for boys.\textsuperscript{24}

The dramatic changes that have occurred since the early 1970s clearly challenge the once impenetrable assumption that sport is the exclusive, given-by-nature, divine right of males. However, because sport has functioned as one of the last masculine strongholds, it is not surprising that some people view an influx of strong, competent sportswomen as an assault on, rather than a progression in, the area. "Increasing female athleticism represents a genuine quest by women for equality, control of their own bodies, and self-

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\item \textsuperscript{17} See Mary Jo Kane, The Post Title IX Female Athlete in the Media: Things Are Changing, But How Much?, 60 J. PHYSICAL EDUC. RECREATION & DANCE, Mar. 1989, at 58, 58–59, 61.
\item \textsuperscript{18} Title IX of the Education Amendments Act of 1972 was designed to prevent the use of federal funds to support sex discrimination in educational settings. It states: "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance." 20 U.S.C. § 1681(a) (1994).
\item \textsuperscript{19} Messner, supra note 9, at 197.
\item \textsuperscript{20} Id.
\item \textsuperscript{22} Kane & Greendorfer, supra note 9, at 32.
\item \textsuperscript{23} NATIONAL SPORTING GOODS ASSN, TOTAL U.S. SPORTS PARTICIPATION: MALES VS. FEMALES, AGE 7, at 1 (1995).
\item \textsuperscript{24} See generally WILSON SPORTING GOODS CO. & WOMEN'S SPORT FOUND., THE WILSON REPORT: MOMS, DADS, DAUGHTERS AND SPORTS 9–14 (1988) (surveying parents and daughters on attitudes toward and involvement in women's athletics).
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definition, and as such represents a challenge to the ideological basis of male domination . . . . In short, the female athlete — and her body — has become a contested ideological terrain." As the remainder of this Article demonstrates, the mass media is one critical area where this contest plays out.

III. MEDIA, SPORT, AND GENDER

American sport has developed a unique relationship with mainstream media. Demonstrative of the symbiotic connection that has evolved between these powerful institutions, media outlets give a disproportionate amount of coverage to sport, thereby helping to create great interest in organized athletics. Sport in turn is used to boost TV ratings, sell magazines and newspapers, and attract corporate sponsors. As a result, the lines between boosterism and objective reporting are often blurred.

Concern about the relationship between sport and the mass media is widespread. Numerous researchers demonstrate that, although the media may appear to simply "report what happened," in reality "they actively construct news through frames, values and conventions." Part of this active construction is not only the selection of particular frames over others, but also the use of values and conventions to interpret the event (e.g., the athletic contest) itself. What particular frames, values, and conventions are emphasized? Do media interpretations favor one group, or set of beliefs, over others?

A number of sport media scholars argue that the media privilege certain viewpoints to the exclusion (or certainly the restriction) of others. They further suggest that, as key benefactors of organized sports, the media have been an important site for reinforcing dominant ideologies and power structures. "Sports tend to be presented in the media as symbolic representations of a particular kind of social order, so that in effect they become mod-

25. Messner, supra note 9, at 197.
27. See id.
28. Id.
30. Birrell & Cole, supra note 7, at 6 (emphasis added). These authors argue that the media "make choices that foreground some elements of the potential narrative and obscure others, and they define and delineate issues through a series of choices including headlines, descriptive word choices, photographs, who to authorize with an interview, and what to report." Id. (citation omitted).
31. See Messner, supra note 9, at 204-05.
32. See Mary A. Boutilier & Lucinda SanGiovanni, Sports, Inc.: The Influence of the Mass Media, in THE SPORTING WOMAN 183, 184-85 (Mary A. Boutilier & Lucinda SanGiovanni eds., 1983); Trujillo, supra note 4, at 292-93. See generally Alan Clarke & John Clarke, 'Highlights and Action Replays' — Ideology, Sport, and the Media, in SPORT, CULTURE, AND IDEOLOGY 62 (Jennifer Hargreaves ed., 1982) (discussing the link between politics and sports and arguing that the two cannot be easily severed).
ern morality plays, serving to justify and uphold dominant values and ideas." Historically, "dominant values and ideas" about sport revolved around traditional conceptions of gender — males were athletes, females were not. But the post Title IX female athlete poses a direct threat to these traditional conventions. Because sport has been a central arena for the ideological production and legitimation of male supremacy, it is of utmost importance to analyze the frameworks of meaning that the media have utilized to portray the emergence of the post Title IX female athlete.

IV. UNCOVERING PREFERRED READINGS OF SPORT MEDIA TEXTS

As mentioned, dominant ideologies are privileged on the whole over other more marginalized sets of belief systems. This is particularly true in mainstream media outlets. According to sport sociologists, one way to determine which ideologies are emphasized over others is to examine the "preferred readings" of sport media texts in a variety of written (e.g., newspaper), oral (e.g., television), and visual (e.g., photographs) formats. A preferred reading refers to the message or theme that the producer of a particular text attempts to convey; obviously, the intent of the producer is to have the message accepted or viewed favorably by the reader/viewer/listener. An example of a preferred reading in a sport text is an action photograph of basketball star Michael Jordan on a box of Wheaties cereal. The producers of this image clearly believe that the consumer will want to buy Wheaties because of the widespread appeal of, or identification with, Michael Jordan.

Producers of oral, written, and visual texts either consciously or unconsciously create or articulate one set of preferred readings over another. Sport sociologists have amassed an impressive body of knowledge examining mass media images to uncover the preferred readings. Throughout these studies, researchers focus on which themes, if any, are emphasized over others, and whether some themes are ignored altogether. These scholars are concerned not only with the "factual particulars" (e.g., percentage of coverage given to female versus male athletes) but also with the meanings underlying the oral, written, and visual sport texts. Discussing this process, Marga-

34. See Messner, supra note 9, at 205.
35. See generally Duncan, supra note 9; Duncan & Brummett, supra note 15 (suggesting that readers and viewers have little control over how various sports and athletes are portrayed throughout the media).
36. This statement is not intended to suggest that media portrayals of sport are interpreted by everyone in exactly the same way, or even in the preferred manner, since media texts produce and reflect multiple meanings, realities and interpretations, including the possibility of an oppositional reading. See Duncan, supra note 9, at 27. An example of an oppositional reading is where the viewer/reader resists or subverts (consciously or otherwise) a preferred reading as when an individual views images of a scantily clad woman and sees not a beautiful body to be admired but an oppressive, harmful stereotype. Sport sociologists have conducted a few isolated studies that provide empirical research on the specific (and multiple) ways that individuals interpret sport texts, particularly as a function of where they are located in the culture (e.g., athlete/nonathlete; female/male). For a more detailed analysis of this research, see Duncan & Brummett, supra note 15.
37. See Duncan, supra note 9, at 27; Duncan & Brummett, supra note 15, at 58–60.
ret Duncan and Cynthia Hasbrook state that,

> in general, [scholars] will look for recurring themes (often not explicit) and will ask, "What is being given special attention in this text?" . . . Is there a particular emphasis — or neglect — of any feature of the text? . . . What ideological threads can be traced throughout the text, and how do they disguise themselves? The focus is not only on what is being said but on how it is said. Texts, both written and cultural, hold clues.\(^{38}\)

The next section outlines specific themes related to female athleticism that media scholars have discovered, the clues that media scholars use to identify these themes, and where in media texts these themes are located.

V. MEDIA REPRESENTATIONS OF THE POST TITLE IX FEMALE ATHLETE

There is overwhelming evidence of differential patterns of media coverage given to female and male athletes. Sport sociologists conclude that this difference in coverage exists based on two observations. First, in spite of the enormous increases in participation rates for a wide variety of women across a broad array of activities, sportswomen have been grossly underrepresented in terms of overall coverage.\(^{39}\) Second, males are consistently presented in ways that emphasize their athletic strength and competence, whereas females are presented in ways that highlight their physical attractiveness and femininity.\(^{40}\) For example, when female athletes do receive coverage, they are continually portrayed in ways that link them to oppressive stereotypes of women’s so-called frailty, sexuality, and limited physical capacity. In this latter regard, female athletes are significantly more likely than male athletes to be portrayed off the court, out of uniform, and in highly passive and sexualized poses. According to Duncan and Hasbrook, these patterns of exclusion and asymmetry constitute a denial of power for sportswomen. By creating the impression that females are largely (if not mostly) absent from the sporting scene, and by treating the female athletes whom we do see,

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38. Margaret C. Duncan & Cynthia A. Hasbrook, *Denial of Power in Televised Women’s Sports*, 5 Soc. Sport J. 1, 7 (1988). Even though this quotation refers to a particular method of textual analysis — hermeneutics — the general principles outlined in the quotation have been used by countless media scholars who were not specifically engaged in hermeneutical analysis. For a more detailed account of this methodological technique, see Paul Ricoeur, *The Model of the Text: Meaningful Action Considered as a Text*, in *HERMENEUTICS AND THE HUMAN SCIENCES: ESSAYS ON LANGUAGE, ACTION AND INTERPRETATION* 197 (John B. Thompson ed., 1981).


40. See generally Gina Daddario, *Chilly Scenes of the 1992 Winter Games: The Mass Media and the Marginalization of Female Athletes*, 11 Soc. Sport J. 275 (1994) (examining the “feminine” portrayal of women athletes in the 1992 Winter Games); Duncan & Hasbrook, supra note 38 (studying the lack of coverage or trivialized coverage of female sports and athletes on television); Kane & Greendorfer, supra note 9 (asserting that despite widespread acceptance of sportswomen, “feminized” coverage of female athletes is a way of reinforcing traditional stereotypes of women and male dominance); Angela Lumpkin & Linda D. Williams, *An Analysis of Sports Illustrated Feature Articles, 1954–1987*, 8 Soc. Sport J. 16 (1991) (citing various discrepancies in athlete portrayal in the areas of gender and race).
read, and hear about in ways that denigrate them and their athletic endeavors, the media marginalize and trivialize women’s sport involvement.41

A. Denial of Power: Underrepresentation

One of the most persistent and universal findings is that the activities and accomplishments of female athletes are grossly underreported in mass media sport coverage. This is true whether we examine time periods in relationship to Title IX, the age of the athlete, her race, or the type of sport in which she is involved.42

1. Time Period. In one of the earliest studies involving Sports Illustrated — the most influential sport publication in print journalism — Leonard Reid and Lawrence Soley examined the coverage given to women and men from 1956 to 1976 and discovered little change across those two decades. The amount of coverage for females ranged from a low of 3.2% to a high of 6.9% when compared to coverage for males.43 In a similar vein, Mary Boutilier and Lucinda SanGiovanni found that sportswomen accounted for less than 5% of all cover photographs on Sports Illustrated between 1954 and 1978.44 This pattern of coverage has not changed in any significant way since these studies. A 1991 study examining the portrayal of females and males in feature articles in Sports Illustrated found that the sport lives and accomplishments of men accounted for almost 91% of the total coverage.45

Unequal coverage is by no means confined to Sports Illustrated. In addition to Sports Illustrated, James Bryant analyzed Runner's World, Sport, and Tennis magazines to determine the amount of coverage given to men's and

41. Duncan & Hasbrook, supra note 38, at 1, 4, 8, 13-14, 18-19.
42. Although these issues are presented here as static, discreet categories, they may operate in a fluid, overlapping fashion. For example, the primary focus of one investigation may be sport type with a secondary emphasis on the race of the athlete.
44. Boutilier & SanGiovanni, supra note 32, at 209. 1954 was the year in which Sports Illustrated was established.
45. Lumpkin & Williams, supra note 40, at 16. In 1993-94, Sports Illustrated had more women on its covers than in any previous two-year span. This was not a giant leap forward, however. In addition to the infamous swimsuit issues, Sports Illustrated featured women as victims: tennis star Monica Seles after she was stabbed by a “fan” who favored Seles' rival Steffi Graf, SPORTS ILLUSTRATED, May 10, 1993; the widows of two professional baseball players killed in a boating accident, SPORTS ILLUSTRATED, July 12, 1993; Mary Pierce, a professional tennis player who has an abusive father, SPORTS ILLUSTRATED, Aug. 23, 1993; and figure skater Nancy Kerrigan after she was attacked while preparing for the Olympics, SPORTS ILLUSTRATED, Jan. 17, 1994.

In 1994, Sports Illustrated ran two extensive feature articles that carried much the same theme. First, an eight-page article featured a former Olympic gymnast who died of an eating disorder. Merrell Noden, Dying to Win, SPORTS ILLUSTRATED, Aug. 8, 1994, at 52. Second, a story ran on the so-called “overabundance” of knee injuries that are occurring among women basketball players. Jack McCallum, Out of Joint, SPORTS ILLUSTRATED, Feb. 13, 1995, at 44. The latter article included the suggestion that these injuries were taking place because of women’s inherent limited physical capacity. The author opined that women are now playing a “man’s game” and their anatomical structure is simply not up to the task. SPORTS ILLUSTRATED, Feb. 13, 1995, at 47.
women’s sports. Bryant found that from 1979 to 1980 the coverage of sports involving female athletes accounted for no more than 17% of the total coverage given to all sports of all these publications. Newspapers also reflect this disparate coverage. Susan Miller analyzed photographs in the sports sections of daily newspapers and found that approximately 6% of the pictures in the *Los Angeles Times* and the *Washington Post* sports sections featured women. Similarly, Bryant’s content analysis of newspapers from 1979 to 1980 indicated that only 4.4% of total column inches in sports sections featured sportswomen. Again, this type of coverage has remained remarkably unchanged even in the wake of Title IX. In a study conducted by the Amateur Athletic Foundation of Los Angeles in the early 1990s, researchers found that in terms of newspaper coverage in four daily newspapers representing different regions of the country (*USA Today*, the *Boston Globe*, the *Orange County Register*, and the *Dallas Morning News*), there were 28.8 times as many column inches devoted to men-only sports as compared to women-only sports in the sports sections.

2. Age. Sport media literature also reveals that the severe under-representation of female athletes is not confined to college-age women or to adult women in professional sports. Examining gender differences in the recently created *Sports Illustrated for Kids*, Margaret Duncan and Amoun Sayaovong found that with respect to visual images in photographs, males outnumbered females by a more than two to one ratio (62% to 28%). This is particularly disturbing given that the intended audience (ages eight - thirteen) is highly impressionable. An equally disturbing example of asymmetry and exclusion can be found in sport publications aimed at adolescents. Jan Rintala and Susan Birrell’s study of *Young Athlete* magazine found that, particularly with respect to team sports, media coverage not only under-represents adolescent females, but also fails to reflect the reality of their sport participation patterns. These authors show that in terms of nationwide participation patterns at the interscholastic level, three sports are dominated by females — field hockey (99%), softball (98%), and volleyball (93%). However, in *Young Athlete*, only 59% of the field hockey players, 51% of the volleyball players, and 33% of the softball players pictured were females.

47. *Id.* at 39.
49. Bryant, *supra* note 46, at 35.
52. *Id.* at 113.
54. *Id.*
3. **Race.** One important (and well justified) criticism leveled against sport sociologists concerns the scant amount of attention that has been paid to the media's portrayal of female athletes of color. In one of the few research investigations that specifically focused on sportswomen of color, Angela Lumpkin and Linda Williams found that with respect to feature articles in *Sports Illustrated* between 1954 and 1987, black women received the least amount of coverage. Out of 3723 feature articles appearing over those two decades, only sixteen featured black women. In a related study, these same authors examined the covers of *Sports Illustrated* from 1954 to 1989 and found that women accounted for a mere 6% of all covers (114 out of 1835), while black women appeared on only five of the 114 covers devoted to women. The first black woman, Althea Gibson, appeared on the cover in 1957. Three decades passed before a second black woman, Jackie Joyner-Kersee, appeared in 1987. Four of the five covers that featured black women appeared in a two year time-period, 1987 to 1989.

The remarkable absence of African-American sportswomen is not confined to mainstream sport publications that specifically (or primarily) target a male audience. A recent examination by Virginia Leath and Angela Lumpkin of the amount of media coverage of female athletes on the covers and in the feature articles of *Women's Sports and Fitness* magazine found that only 8% of covers from 1975 to 1989 featured black women. This same pattern also emerged for feature articles.

4. **Sport Type.** Interestingly, the amount of coverage given to female athletes often depends on the type of sport in which the athletes participate. In one of the earliest and most influential analyses of sport and gender, Eleanor Metheny argued that social attitudes and values shape the nature of women's sport participation. More specifically, she observed a direct link between cultural expectations of "gender appropriate" behavior and women's involvement in specific sport types. Activities that require females to move gracefully and in aesthetically pleasing ways, such as gymnastics or figure skating, are socially acceptable because such physical movement is highly consistent with traditional notions of femininity. In contrast, sports that

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55. Lumpkin & Williams, supra note 40, at 29.
57. Id. at 52.
58. Id.
59. Id.
61. Id.
63. See id. at 43-56, 163–73.
require the use of a heavy object, such as shot put, or face-to-face competition in which the athlete must use physical force to overcome an opponent, such as football, are heavily stigmatized for the female athlete precisely because these activities are antithetical to conventional norms regarding "appropriate" female behavior.

Mass media coverage reflects these gender role expectations. Employing Metheny's theoretical framework of "sex-appropriate" and "sex-inappropriate" sports, Janet Parks and I examined coverage of females in *Sports Illustrated* as a function of sport type. We also explored whether this relationship is influenced by an historical time frame related to periods before, during, and after the passage of Title IX. Our study found that females associated with sex-appropriate sports were given significantly more coverage than other female athletes regardless of the Title IX time frame. Following this study, Lumpkin and Williams extended their analysis of *Sports Illustrated* to include race as well as sport type. They discovered that, regardless of a female athlete's racial background, she was much more likely to be portrayed if she participated in a sex-appropriate sport. Consistent with those findings, Leath and Lumpkin found that even in *Women's Sport and Fitness* magazine, one of the few publications devoted to covering women's involvement in sport and physical activity, females identified with sex-appropriate sports and activities were much more likely to be featured than females participating in sports or physical activities deemed to be sex-inappropriate.

Similar patterns have been found in broadcast journalism. Analyzing television coverage of the 1992 Summer Olympics, Catriona Higgs and Karen Weiller found that women who participated in individual sports, many of which are considered "sex-appropriate" sports, such as gymnastics, cycling, and tennis, were given more air time than sportswomen in team sports such as basketball and volleyball. Although not specifically related to sport type, Gina Daddario also examined television coverage of the 1992 Olympic Games. She found that female athletes were underrepresented even though all of the five gold medals awarded to the United States were won by women. This finding is particularly ironic in light of the fact that 57% of

65. See Lumpkin & Williams, supra note 40, at 26.
66. See id. at 30. The one exception to this finding was that black women were also featured in basketball, a sport that is often considered "inappropriate" due to the amount of physical contact required and because it has been traditionally associated with men. One possible explanation for this variation is that much change has taken place since Metheny introduced her typology over 30 years ago. However, if this were the case, white women basketball players would also be featured more frequently. Although highly speculative, this finding may be the result of racial stereotyping whereby basketball is not seen as a "sex-inappropriate" sport for black women.

67. Leath & Lumpkin, supra note 58, at 125.
69. Daddario, supra note 40, at 276.
the viewing audience was female, atypical for sport audiences. A 1994 media study on broadcast journalism also revealed that evening news programs on the three major local network affiliates in Los Angeles (ABC, CBS, NBC) covered men's sports 94% of the time.

The severe and continued underrepresentation of women's sport involvement reflects a symbolic annihilation of the female athlete. The significance of women's virtual exclusion from media coverage in the sport world cannot be underestimated. As early as the late 1970s, media scholars such as Gaye Tuchman argued that individuals and the roles with which they are associated become incorporated by the media to reflect "symbolic representations of [dominant norms and values of] American society." The media greatly influence who and what have value, status, and power in this culture. "By their symbolic annihilation of the female athlete, the media tell us that sportswomen have little, if any, value in this society, particularly in relationship to male athletes."

Women's underrepresentation is especially troubling not only because it gives the impression that women are largely absent from sport, but also because that is a false impression. The reality of women's ever-expanding involvement in sport and physical activity is denied. For example, one popularly held assumption is that differential coverage of "sex-appropriate" and "sex-inappropriate" sports simply reflects a realistic and accurate assessment of women's sport involvement. Recent nationwide data from the National Sporting Goods Association, however, indicates that 8.3 million young girls and women play basketball and 7.5 million play softball, while significantly fewer young girls and women participate in the more "sex-appropriate" sports of golf and tennis — 5.4 million and 5.9 million respectively. A competing explanation for the differential coverage is that women's participation in individual, "sex-appropriate" sports is less threatening to the traditional gender order because involvement in these sports perpetuates notions of feminine, ladylike behavior.

B. Denial of Power: Trivialization and Sexualization

Even though sportswomen are significantly underreported relative to their participation levels, 6% to 8% of all media coverage does focus on

70. Id. at 277 (citing Richard Sandomir, Winter Games Broadcast Wasn't a Loser, CBS Says, N.Y. TIMES, Feb. 26, 1992, at B13).
73. Kane & Greendorfer, supra note 9, at 34.
74. NATIONAL SPORTING GOODS ASS'N, supra note 23, at 1.
75. This statement is not intended to demean or denigrate these sports or the athletes who compete in them. I am simply pointing out that participation in these types of sports is highly consistent with traditional notions of femininity. It is perhaps no coincidence that the only two professional sports that have given women any degree of popularity and recognition are golf and tennis.
women. Sport sociologists therefore have examined not only the amount of coverage, but also the type of coverage given to sportswomen. Their findings indicate that there are two interrelated and highly persistent media techniques — trivialization and sexualization — that deny women power when they are covered. Female athletes are trivialized when they are portrayed in ways that do not treat them, or their athletic achievements, seriously. This is accomplished by focusing on the off-the-court characteristics and behavior of sportswomen, such as their femininity and personal lives, rather than their hard work, discipline, and contributions as gifted athletes. Female athletes are sexualized either overtly, by portraying them as sexual objects, or more covertly, by overemphasizing their physical attractiveness. In either case, female athleticism is ignored or devalued.

Research examining trivialization and sexualization in media portrayals falls typically into one of two categories - visual images such as photographs and language in the form of oral commentary or written texts.

1. Visual Images. Margaret Duncan argues that the photograph is a particularly powerful tool for creating preferred readings because of “its ability to project an aura of naturalness, realism, and authenticity.” As a result, the image in the photograph appears to be a completely reliable source of information. But Duncan points out that photographs, like other visual forms of mass media, are often politically motivated. “Despite their apparent realism and objectivity, however, photographs are never neutral renderings of images. Photographs are subjected to artificial processes and social uses that make them as much interpretations of reality as any other visual medium.”

Sport sociologists find that female athletes are portrayed in photographic images in ways that clearly reflect and reinforce dominant stereotypic ideologies. Sportswomen are often presented as ladies first, and athletes second, if at all. In one of the first analyses of sport photographs, Mary Boutilier and Lucinda SanGiovanni examined Sports Illustrated’s 1979 Silver Anniversary issue, a collection of photographs highlighting important sport moments over the then twenty-five year history of the magazine. The authors discovered that almost 60% of the photographs of women portrayed these athletes in passive, nonathletic roles; only 44% of the photographs of the men depicted their personality rather than their active athleticism.

Likewise, Jan Rintala and Susan Birrell’s 1984 study of photographic images of adolescent female athletes in Young Athlete magazine found that coverage reinforced traditional notions of “appropriate” femininity. Sixty-four percent

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76. This type of coverage is in sharp contrast to coverage given to male athletes who are portrayed primarily in ways that highlight their accomplishments as athletes. For example, female athletes are typically photographed off the court, out of uniform, and in passive poses. Male athletes consistently appear in photographs where they are on the court, in uniform, and in active athletic competition. See Boutilier & SanGiovanni, supra note 32, at 210.
77. Duncan, supra note 9, at 23.
78. Id.
80. Id. at 210.
of the photographs depicted female athletes in aesthetic activities, such as gymnastics, while only 9% portrayed females in sporting activities that required strength or physically overpowering an opponent.81

More recent studies find similar patterns. A groundbreaking investigation done by Margaret Duncan in 1990 examined sport photographs of female athletes participating in the 1984 and 1988 Olympic Games. The photographs were generated from a comprehensive sample of popular illustrated magazines with large circulations throughout North America. These magazines included Time, Newsweek, Life, Sports Illustrated, and Macleans. Duncan found that much of the ideological content of these photographs emphasized the sexual difference of the female athlete.82 More specifically, she discovered that these elite female athletes were portrayed in ways that emphasized their physical appearance. They also were photographed in poses that displayed them as sexual objects for male pleasure. For example, Duncan points out that Florence Griffith Joyner ("Flo-Jo") was a popular subject of sport photographs precisely because she fit conventional standards of beauty. "It is no coincidence that Joyner’s rapier-like, intricately painted fingernails are often visibly represented in photographs . . . . Griffith Joyner’s nails are an external adornment that shouts femininity . . . ."83 Many photographs featured her off-the-track persona in bright red evening dresses and a "white strapless gown with rows of ruffles while carrying the American flag."84 Media scholar Gina Daddario supports Duncan’s observations and adds that "in Newsweek’s 1992 winter Olympic preview, figure skater Kristi Yamaguchi was compared to a cartoon character, ‘as her physical traits include a Betty Boop mouth and two beauty marks wonderfully positioned under the left eye and the lips.’"85 Virginia Leath and Angela Lumpkin found that the portrayal of female athletes on the covers of Women’s Sport and Fitness magazine also trivialize their athleticism. Almost 60% of the athletes featured in the magazine were shown in posed shots rather than actively participating in their respective sports.86

With respect to the technique of sexualization, Duncan argues that female athletes are often posed in ways that bear a striking resemblance to women in soft-core pornography.87 One of the many photographs that she offers as evidence is a picture of Bonny Warner, a member of the U.S. luge team, in which the camera focuses on her genital region. The photo was "snapped from between her legs and framed so that her crotch is precisely

81. Rintala & Birrell, supra note 53, at 240.
82. See generally Duncan, supra note 9.
83. Id. at 28.
84. Id. at 29. This coverage is in sharp contrast to that given to Olympic heptathlete Jackie Joyner-Kersee, a contemporary of Griffith Joyner’s, and the only American to win back-to-back gold medals as the world’s greatest all around athlete. For example, as Figure 3 indicates, Joyner-Kersee is typically shown in the heat of athletic competition. See infra p. 32.
86. See Leath & Lumpkin, supra note 60, at 123.
87. Duncan, supra note 9, at 29-33.
Commenting on the role of the media in general, and visual images in particular, Boutilier and SanGiovanni emphasize how significant the media are in shaping values and attitudes as well as in providing knowledge of ourselves and others: "Virtually no institution, social process, group, or person is left unaffected by the images and words that emanate from these [media] sources." From the research cited above, it is clear that one of the most powerful transmitters of cultural knowledge — the visual image — is actively shaping, reinforcing, and creating oppressive and demeaning attitudes toward female athleticism. At the very least, visual images that over-emphasize the femininity and physical attractiveness of sportswomen undermine their athletic capabilities and accomplishments. This in turn perpetuates a belief system that constructs the female athlete as a second class citizen, a counterfeit version of the real — that is male — athlete. At the very most, images of sportswomen, particularly images that sexualize female athletes, serve patriarchal ends. By sexualizing sportswomen, the media continually remind us that sportswomen are not really like male athletes and never can be or should be. "Focusing on female difference [in sport photographs] is a political strategy that places women in a position of weakness." The knowledge, values, and attitudes imparted in these stereotypical visual images is, at its root, about one issue — power.

2. Language. Trivialization and sexualization also occur in the language, both written and oral, used to describe women's athletics. There is a vast body of discourse on the relationship between language and gender. Much of this research shows that our language is highly gendered. How women and men are discussed and written about is never separate from wider social, political, and economic relationships based on gender. For example, adult women are still often referred to as "girls," whereas adult men are rarely referred to as "boys." In a similar vein, individuals in lower status occupations (in the majority of cases, women) are more likely to refer to their supervisors as "Mr." or "Mrs." or "Doctor," while the supervisor (who in most cases is still a man, particularly at upper levels of supervision) is more likely to refer to employees by their first names only. This pro-

88. Id. at 30 (citation omitted).
89. Boutilier & SanGiovanni, supra note 32, at 183.
90. See discussion supra pp. 22–25.
91. See Kane & Snyder, supra note 12, at 92.
92. Duncan, supra note 9, at 40 (emphasis omitted).
93. Id.
95. See Richardson, supra note 94, at 46.
96. See Michael A. Messner et al., Separating the Men from the Girls: The Gendered Language
cess is referred to in the literature as a "hierarchy of naming" in which "dominants" are referred to more formally and "subordinates" more informally.97 How this particular process is manifested in sports coverage will be addressed momentarily.

Language both reflects and contributes to unequal power relations. Gendered language "reflects and helps maintain the secondary status of women" in this culture.98 One way that language is used to confer second class status on female athletes is through a process that scholars refer to as "asymmetrical gender marking."99 An example of gender marking is when women's athletic events are referred to as "women's athletic events," while men's athletic events are referred to as simply "athletic events." Thus, we have the "Final Four" and the "Women's Final Four." Scholars suggest that as a result of this process, women are marked as the "other," while men are assumed to be the definitive standard and the universal reference point.100

While this difference may seem, on the surface, to be a rather trivial concern, sport sociologists point out that when this asymmetry occurs, "men's [sporting activities are] presented as the norm, the universal while [women's activities are] continually marked as the other, the derivative (and by implication, inferior) to the men's [activities]."101 A recent example of asymmetrical gender marking comes from an investigation of the TV commentary used to describe the "Battle of the Champions" tennis competition that took place between Martina Navratilova and Jimmy Conners in 1992. Christy Halbert and Melissa Latimer found that the commentators repeatedly reaffirmed the universality of men's tennis in their dialogue. For example, commentators said Jimmy Conners' service return was considered to be the best in the game while simultaneously remarking that Navratilova's serve (also considered the best among her peers) was what set her apart in women's tennis.102

A second way that women are denied power with respect to language is through the hierarchy of naming process. In a study of television coverage of the 1989 women's and men's NCAA Final Four basketball tournaments and the 1989 U.S. Open professional tennis tournament, a hierarchy of naming pattern closely linked with the gender of the athlete was found.103 Women's tennis athletes were referred to by their first names approximately

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97. See Richardson, supra note 94, at 45-47, 50. Although Richardson herself does not use the term "hierarchy of naming," other scholars citing her work on the specific ways in which language subsumes women under men do so. See, e.g., Halbert & Latimer, supra note 94, at 300.


99. See Halbert & Latimer, supra note 94, at 300, 302, 307; see also, Duncan & Jensen, supra note 95, at 223-24 (comparing how television sports commentators speak about women's and men's athletic events).

100. See Duncan, supra note 9, at 23; see also Messner et al., supra note 96, at 222-23.

101. Messner et al., supra note 96, at 224.

102. See Halbert & Latimer, supra note 94, at 302.

103. Messner et al., supra note 96, at 224-25.
53% of the time; in contrast, men were referred to by their first name only 8% of the time. In the basketball commentary, the use of first names was less striking, but the pattern remained the same. There were thirty-one examples of females referred to by first name compared to nineteen examples of males.

In 1994, the authors of this study continued their initial investigation in order to determine what, if any, change had occurred after the initial study was widely reported in the press. The authors found that with respect to a naming hierarchy among male and female tennis players, the use of first names only for female athletes had dropped from 53% to 32%. The use of first names for males increased from 8% to 12%. The results were similar for basketball, but, as in 1989, use of first names by commentators was low for both female and male athletes. On a positive note, the follow-up study found that "the practice of calling women athletes 'girls' has virtually disappeared."

One corollary to the hierarchical naming process is the tendency to infantilize individuals who occupy positions typically associated with subordinate status. Laurel Richardson argues that referring to dominants in formal ways, and subordinates in informal ways, linguistically confers adult status on the former while marking the latter in infantile ways. A classic example of sport media coverage using language to infantilize female athletes is offered by Daddario in her analysis of TV commentary during the 1992 Winter Olympics. U.S. speed skater Bonnie Blair, the world record holder and five time Olympic gold medalist, was "referred to as 'America's little sister' and 'America's favorite girl next door.'" In a Valentine's Day tribute to Blair, the commentator stated that Blair was "as genuine as peanut butter and jelly. Here at Albertville, she's been as smooth as peanut butter on ice and as sweet as jelly off ice." It is worth noting that, at the time, our "little kid sister" was twenty-eight years old.

Scholars have also discovered that the language used to describe female athletes often sexualizes them. Higgs and Weiller point out that the visual

104. Id. at 225.
105. Id. It should be noted that in every instance where male basketball players were referred to by their first name, the individual being named was African-American. Id. at 228. Although this latter finding is perfectly consistent with the theory associated with a hierarchy of naming process — that "subordinates" are more likely to be referred to by their first name only — it is nevertheless an unsettling discovery.
106. IMA TEUR ATHLETIC FOUND. OF LOS ANGELES, supra note 50, at 3.
107. The authors explain this increase by the fact that John McEnroe, a contemporary of the players, was the commentator for one contest; he thus knew each player on a first name basis. When this match was controlled for this factor, first name use dropped to 6.3% or a bit less than in the earlier study. Id. at 19.
108. Id. at 19-20. With respect to race, as in the earlier study, almost every instance (90%) of first name only references to male athletes were to men of color.
109. Id. at 19.
110. See generally Richardson, supra note 94 (demonstrating how English usage constructs and reflects gender stereotypes).
111. Daddario, supra note 40, at 282.
112. Id.
images people saw on the screen during television coverage of the 1992 Summer Olympics were often incongruent with the language that was used to describe sportswomen’s athletic endeavors. For example, a female gymnast was shown performing a daring and difficult move “on the uneven bars, yet commentators provided listeners with such phrases as ‘those long beautiful legs,’ ‘the beautiful lady,’ and ‘the painted bird’ instead of focusing on the difficulty of the event.” In a similar vein, Janet Parks and I compared how female and male professional tennis players were written about in Sports Illustrated. We noted one particularly offensive example where female athletes were sexualized. In a match between Martina Navratilova and Steffi Graf during the 1989 U.S. Open, the author of the article said, “both women left the court to change sweaty shirts in order to avoid being in a ‘soaking wet T(ennis)-shirt contest.’” We also found a reference to “sweaty shirts” for male athletes, but it was not presented in a way that trivialized or sexualized the players.

The influence of oral and written language on how we view the athleticism of men and women should not be underestimated. Christy Halbert and Melissa Latimer argue that “the language of sports commentators is important because of the power sport commentators have in shaping and mediating the image of an event for television viewers.” This in turn has enormous influence on the construction of the individual viewer of the meanings of sport contests as well as of the athletes who perform in them. And, as numerous authors point out, media coverage that contains gender-biased language profoundly affects social inequalities between women and men.

C. Denial of Power: Ambivalence

While less than ideal coverage is afforded to female athletes, it would be simplistic to state that sportswomen are never portrayed in a positive light. In fact, women’s sports involvement is often celebrated. Duncan and Hasbrook found that messages of television commentators about female surfers indicated they were “capable, strong, talented athletes who were participating in an exciting sport.” However, this same research also found that media coverage reflects a “profound ambivalence in the reporting of the women’s sports, something that is not present in the reporting of the men’s sports.”

What exactly is meant by ambivalence in media reporting? Ambivalence is an insidious process whereby the media give out conflicting messages about female athleticism. “[P]ositive portrayals of sportswomen are combined with subtly negative suggestions that trivialize or undercut the women’s

113. See Higgs & Weiller, supra note 68, at 240–41.
114. Id. at 240.
115. Kane & Parks, supra note 39, at 70.
116. Id.
117. Halbert & Latimer, supra note 94, at 300.
118. Duncan & Hasbrook, supra note 38, at 8.
119. Id. at 14.
120. Id. at 1 (emphasis added).
efforts. Such trivialization is a way of denying power to women."121 I argued above that media portrayals of modern day sportswomen reflect a power struggle in that women are pushing the boundaries of what it means to be an athlete, yet at the same time meeting great resistance.122 The media reflect and contribute to this power struggle when they recognize the enormous social change that has occurred over the last two decades while steadfastly maintaining that superior athleticism is still the domain of men. Coverage that reflects an ambivalence toward female athleticism allows those who hold power to acknowledge, and thus to accommodate, social changes that have taken place within the last two decades while simultaneously offering resistance through the maintenance of the status quo.123 (See Figure 1).

121. Id.
122. See discussion supra pp. 6-9.
123. Kane & Greendorfer, supra note 9, at 39.
Figure 1. An Example of Ambivalent Portrayal.
Women's Professional Volleyball Player Karolyn Kirby, as pictured in *Volleyball Monthly*, March 1992, at 49.
As Duncan and Hasbrook point out, media outlets that cover women's sports are operating out of self-interest and therefore want to create interest in and support for the event. At the same time, there appears to be a strong desire to reinforce the position that men remain the most important athletes. Coverage that is ambivalent reveals the mixed set of goals underlying these competing forces when it praises women's abilities and accomplishments, and thus the significance of the event, while reminding us that women are either pale imitations of the "real thing" or that they are ladies first and athletes second.

Margaret Duncan was the first sport sociologist to describe ambivalent coverage. In a 1986 article she discussed how magazine and newspaper journalists portrayed Olympic female athletes in contradictory ways. "Writers veered wildly between describing women athletes as powerful, precise, courageous, skillful, purposeful, and in control — and as cute, vulnerable, juvenile, manipulating, and toy- or animal-like." A follow-up study analyzed the descriptions by television commentators of male and female athletes competing in the same sports. This investigation compared the treatment of male and female athletes competing in the 1986 men's and women's NCAA Division I basketball championship games, in international surfing competition, and in the New York City Marathon. They found evidence of ambivalence in all three contexts. In basketball, the fact that the women's game was broadcast on national (CBS) television gave it great significance as a sporting event. However, much of the commentary ignored the physical skills and mental strategies of the female players. The focus instead was on their families, their personality characteristics, and their injuries. In the surfing coverage, the authors noted that the narratives describing female and male surfers were equal, and that commentators also emphasized the skill of all the athletes. Nevertheless,

[the visual imagery] fragmented and objectified women by presenting them in a highly sexualized way, focusing on certain body parts and depicting women in mostly passive poses. Thus, while the commentary suggested that female surfers were strong and capable, this positive portrayal was undermined by the visual implication that women were decorative sex objects . . .

In the New York City Marathon, there was one particularly graphic example of ambivalence. As Greta Waitz, the winner of the women's race, was shown crossing the finish line, the reporter's commentary focused on who was finishing third in the men's race. The authors noted that this visual/narrative incongruity never happened during the coverage focusing

124. Duncan & Hasbrook, supra note 38, at 8.
126. See Duncan & Hasbrook, supra note 38, at 7, 9-11, 18-19.
127. Id. at 7-18.
128. Id. at 10-11.
129. Id. at 19.
130. Id. at 16.
on men. This particular type of coverage is not confined to marathons. A recent study comparing coverage of women’s and men’s college basketball at their respective 1993 championship tournaments indicated that two-thirds of the women’s half-time shows were devoted to discussions about the male players, teams, and games.

Ambivalent messages about women’s athleticism are widespread throughout the sport media. In professional tennis, although Martina Navratilova was complimented frequently for her discipline, hard work, and great skill, often a discussion of her emotional vulnerability and history of mental fragility invariably followed. A more subtle form of ambivalence was reflected in a study of Olympic gymnasts. Commentators stated that “pretty Kim Zmeskal [was] showing her muscle in Barcelona.” At the same time, these commentators described Zmeskal as someone who is “as terrific an athlete as she is gorgeous.” The net result of this type of portrayal is that, at the very least, it shifts the focus away from, or denies altogether, the seriousness and the importance of women’s athletic endeavors. These wildly conflicting messages trivialize women’s efforts. As a result, women are denied the power and prestige ordinarily accorded to great athletes.

VI. HOMOPHOBIA IN MEDIA COVERAGE OF WOMEN’S SPORT

As we have seen throughout this Article, a preponderance of visual, written, and oral texts emphasize the femininity, physical and sexual attractiveness, and personal lives and characteristics of sportswomen, often to the exclusion of their accomplishments as serious athletes. In this sense, female athletes are cast as fundamentally different from their male counterparts. The most significant aspect of this pattern of portrayal is the nature of the so-called difference. Female athletes are portrayed as different from male athletes not because they are shown, for example, as community leaders, savvy business women, or even outstanding scholars. Rather, their so-called difference is tied systematically to more traditional gender stereotypes about what it means to be a “proper lady.” I argue that much of this type of coverage has to do with deeply entrenched myths surrounding women’s sports and homophobia. Historically, participation in sport has been seen as problematic for females because of concerns ranging from fears that women’s participation will harm their reproductive capacity, and thus make them unable to fulfill their “appropriate” roles as wives and mothers, to claims that athletic involvement will turn women into men because sport is, after all, a supremely masculine endeavor. One implicit, and in some cases

131. Id.
132. AMATEUR ATHLETIC FOUND. OF LOS ANGELES, supra note 50, at 14.
133. See Halbert & Latimer, supra note 94, at 304.
134. Higgs & Weiller, supra note 68, at 241.
135. Id.
136. Duncan & Hasbrook, supra note 38, at 8.
137. See discussion supra pp. 13-35.
138. See, generally Boutilier & SanGiovanni, supra note 32, Pat Griffin & James Genasci, Addressing Homophobia in Physical Education: Responsibilities for Teachers and Researchers, in SPORT,
explicit, manifestation of this latter concern is the contention that female athletes, particularly those who engage in more “masculine” sports, are or will become lesbians.

Sport sociologists are increasingly aware of the degree to which the fear of lesbians’ presence in sport — reflected in and perpetuated by homophobia — serves to deny recognition, respect, and status in sport to all female athletes. Sport sociologists also are becoming sensitized to the role of the media in this process. If we accept earlier arguments that disparate patterns of media coverage reflect a power struggle in which women are relegated to the category of second class citizenship, homophobia becomes an enormously effective tool for grouping sportswomen into that category regardless of the sexual orientation of any particular athlete. To be labeled as lesbian is to be stigmatized as abnormal or deviant, and it may also threaten one with the loss of employment, family, or career.139 In one of the few empirical studies on the experience of lesbian athletes, Helen Lenskyj found that the sport climate was so hostile to women, lesbians, and feminists that most lesbians, regardless of their status as either athletes, coaches, administrators, or faculty members, do not disclose their sexual orientation for reasons of survival.140

There is some evidence that as women gain more power and acceptance in sport, tactics such as lesbian-baiting (i.e., accusing women of being lesbians in order to discredit or marginalize them) are on the rise.141 Although she does not specifically address the connection between women’s sport and lesbianism, social activist and writer Suzanne Pharr describes how lesbians are seen as a threat to the established order, and how that threat is dealt with in ways that marginalize all women labeled as lesbians. When this happens,

homophobia can wield its power over all women through lesbian baiting. Lesbian baiting is an attempt to control women by labeling us as lesbians because our behavior is not acceptable . . . . [T]o be named as lesbian threatens all women, not just lesbians, with great loss. And any woman who steps out of [a stereotyped] role risks being called a lesbian.142

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139. See generally Griffin & Genasci, supra note 136, at 213; Julie Cart, Lesbian Issue Stirs Discussion, LOS ANGELES TIMES, Apr. 6, 1992, at C1. See generally HELEN LENSKYJ, OUT OF BOUNDS: WOMEN, SPORT AND SEXUALITY (1986) (examining relationships between women's participation in sports, social attitudes, and reproduction).

140. Helen J. Lenskyj, Unsafe at Home Base: Women's Experiences of Sexual Harassment in University Sport and Physical Education, 1 WOMEN SPORT & PHYSICAL ACTIVITY J. 19, 27 (1992). One powerful example that supports Lenskyj's argument occurred in 1992, when the head woman's basketball coach at Penn State, Renee Portland, created a national firestorm by declaring that lesbians were not welcome on the team and that she would revoke any players' scholarship if she discovered they were lesbians. Cart, supra note 139, at C12. Penn State has since instituted a university-wide policy banning discrimination on the basis of sexual orientation Id. Portland has not been censored by Penn State Id.

141. Anecdotal evidence suggests that homophobia is often used as a recruiting tool. For example, one former basketball player said that when she was being recruited, a number of male coaches told her that they would not recruit lesbians. See Cart, supra note 139, at C12.

Pharr's words are particularly relevant to female athletes. One way that female athletes are "stepping out of role" is through their continued insistence on greater equality in sport. A strategy often used to counter any threat posed by such demands for equality is to portray sportswomen in ways that reinforce traditional notions of femininity and sexuality, rather than to emphasize more threatening images of women as enormously powerful and gifted athletes. One corollary to this feminine portrayal is homophobia. While many of the individuals who produce media messages of female athleticism are attempting, in many cases with the best of intentions, to counter what they see as an "image problem," I argue that this perceived image problem is often code, conscious or otherwise, for fears about lesbianism. When the media portray sportswomen as traditionally attractive "ladies," they do more than simply ignore or seriously undermine the athletic competence of women. They also convey the message that female athletes are "normal," that is, heterosexual. By showing female athletes in dresses and make-up, and by highlighting their personal and family lives, particularly if those lives involve husbands, boyfriends, and children, the media reassure the audience that the age-old connection between "manly" females and sport need not apply to this post Title IX world order. In so doing, the media reinforce an equally oppressive stereotype—that women who look a particular way, or who are involved in a particular set of family arrangements, could not possibly be lesbians.

An especially graphic example of this type of coverage involved the retirement of professional tennis star Chris Evert in the late 1980s. Acknowledging the importance of this event, Sports Illustrated placed her on its cover. However, of all the ways Sports Illustrated could have portrayed her glorious athletic career, they chose to picture Evert with the caption "I'm Going To Be A Full-time Wife." This characterization of her retirement suggests a number of social concerns in an era when traditional gender roles are being contested and re-negotiated, not just in the world of sport, but throughout all sectors of society. One concern is the suggestion that Evert has completed her career as a professional woman, and thus it is time for her to put all else aside and return to her "proper" sphere, the home. A second concern is the suggestion that involvement in sport may make a woman "too masculine." The feature article that accompanied the cover pho-

143. See Adrienne Rich, Compulsory Heterosexuality and Lesbian Existence, 5 SIGNS: J. WOMEN CULTURE & SOC'Y 631, 647–48 (1980) (pointing out that accusations of deviance—being pejoratively labeled a lesbian—also contain women's power by fragmenting them and by discouraging their resistance).

144. I have had countless conversations with many individuals who are responsible for creating media images of female athletes (e.g., sports marketing personnel and sports information directors). They have often stated to me that one reason for low fan and corporate interest in women's athletics is the belief that sportswomen are just "too manly or masculine." During these conversations the "L" word was never explicitly stated as being the cause of this commonly held perception.


146. Id.
toograph equated Evert with a heterosexual role, while contrasting her with long-time rival and friend, Martina Navratilova, who then was rumored to be, and now is confirmed to be, a lesbian.\footnote{147} Evert was portrayed as “Chrissie,” America’s answer to the more “manly” Eastern European players such as Navratilova, who were beginning to take over women’s tennis during this time period. In the same feature article is a pictorial chronology of Evert’s “career,” where we see her pictured from left to right with her first boyfriend, Jimmy Conners, then with short-lived flame Burt Reynolds, followed by Steve Ford (son of former president Gerald Ford), then with first husband, John Lloyd, and, finally, with current husband Andy Mill.\footnote{148} This chronology suggests that Evert’s true career is about her advancement as a future wife, not as a professional tennis player who had an enormously successful career as a professional athlete. It is worth noting that this athletic career spanned seventeen years (1972-1989) during which Evert won 157 singles titles, ranked number one eight times, and won eighteen grand slam championships that included seven French Opens, six U.S. Opens, three Wimbledons, and two Australian Opens.\footnote{149}

The presentation of “Chrissie” Evert as America’s heterosexual girl next door was not confined to *Sports Illustrated*. In a lengthy tribute to Evert after she announced her retirement, sports columnist Tom Powers provided us with a collection of bigoted stereotypes associated with women’s athletics. He began by lamenting how, with Evert gone from the scene, “today’s youngsters . . . will grow up thinking all women tennis players have thighs like Schwarzenegger and last names that end in the letters o-v-a. But those of us who grew up with Chrissie know better.”\footnote{150} “Knowing better” apparently means being able to identify who the real (i.e., “proper”) female athletes are. During Evert’s heyday, we could “[f]lip on the tube and see Chris volleying demurely from the baseline. Her opponent, often a European with serious facial hair, would be lunging and twisting and grunting after the ball. Chris would take a couple of quick steps and pop! . . . advantage Evert.”\footnote{151} Powers then stated that Chrissie would never charge the net. Using perfect ground strokes, she “stayed in the backcourt and hit away instead of charging forward like some disgusting buffalo.”\footnote{152}

\footnote{147. Indeed, one focus of the feature article on Evert’s retirement was her close friendship and long-standing rivalry with Navratilova. Curry Kirkpatrick, *Tennis Was My Showcase*, SPORTS ILLUSTRATED, Aug. 28, 1989, at 72, 78. In this same issue of *Sports Illustrated*, Navratilova wrote a tribute to Evert in which she discussed their close relationship and also mentioned how much she would miss Evert. Martina Navratilova, *A Great Friend and Foe*, SPORTS ILLUSTRATED, Aug. 28, 1989, at 88. It should be noted that when Navratilova retired in 1995, *Sports Illustrated* chose not to feature her on the cover, nor did they run an article on the athlete many consider to be the greatest female tennis player of all time. One can only speculate whether Navratilova’s sexual orientation had anything to do with this editorial decision.}

\footnote{148. Kirkpatrick, supra note 147, at 76-77.}

\footnote{149. Telephone Interview with Mary Duffy, Editor-in-Chief, *Women’s Sports & Fitness* (Mar. 1995).}


\footnote{151. Id.}

\footnote{152. Id.}
Contrasting Evert to these “manly” Eastern European players throughout his column, Powers opined as to the reasons why Evert was so popular. He quoted an intercollegiate female tennis player who said that Evert was a good role model for young girls because of her poise and because, according to this same athlete, Evert has “always been feminine, that’s one thing I really liked about her. She could be competitive and still be a girl.” Finally, Powers ended his tribute by pointing out that Evert reigned in between Billie Jean King, who “was involved in a palimony suit with another woman with whom King admitted having a relationship. Nice p.r. for the sport, eh?” and Martina Navratilova, “a walking mixed-doubles team. Built like a linebacker, Navratilova eventually [out]muscled Chrissie from the No. 1 ranking.” According to Powers, such things made Chrissie’s farewell a sad time indeed for women’s tennis.

Sport sociologists have suggested that the type of media coverage described above reflects a hyperheterosexual “female apologetic” whereby athletic women are asked to overcompensate for their so-called masculine behavior such as sweating and being physically strong and powerful. The photograph of the 1990 University of Nebraska women’s softball team demonstrates a “female apologetic.” It screams out, as if to say, “we’re not Division I student-athletes in the elite echelons of softball players in this country who can hit and run and catch and slide; we’re beautiful (heterosexual) sorority sisters.” This type of image suggests that the age-old “problem” associated with women’s sport involvement is no longer a concern. It is important to keep in mind, however, that the “problem” in women’s sports is not the presence of lesbians, it is the presence of homophobia. (See Figure 2).

153. Id. at 11C.
154. Id.
155. Id.
156. See Messner, supra note 9, at 203; see also JoAnna B. Rohrbaugh, Femininity On The Line, PSYCHOL. TODAY, Aug. 1979, at 30-35.
157. This photograph was the University of Nebraska women’s softball team picture appearing on the cover of their 1990 media guide. The purpose of a media guide is to provide information about the team to various individuals associated with the media (e.g., sports reporters). The media guide cover is intended to portray a certain image that a particular institution or team wants to project to the media. In this sense it is much more consciously manufactured than is, for example, a reporter’s story on the outcome of a game. Clearly, the team wants to produce a favorable impression with sports reporters. One can only speculate if part of that favorable impression involves reassuring the reporters that “our girls aren’t like that.”
Figure 2: An Example of Homophobic Coverage:
Team Photograph of the 1990 University of Nebraska Women's Softball Team on the Media Guide Cover
An overwhelming body of empirical evidence gleaned from media coverage of sport demonstrates that female athletes remain second-class citizens who are trivialized, sexualized, and demeaned in one of the most influential institutions in American culture. Individuals internalize the messages, values, and beliefs promoted by mass media, so that whenever media texts and commentaries contain sexist ideologies, the repercussions of this internalization are harmful to the path of women athletes. As Duncan and Sayaovong point out, such coverage,

divides girls and boys, women and men, and channels them into arbitrary fields of endeavor . . . . In the sporting world the most extreme expression of [sexist] ideology maintains sport as a male-only preserve. At the very least, the ideological consequence of sexual difference [in media portrayals] is to close off some avenues of sport and play to women and girls.159

By portraying females in ways that systematically highlight their sexual difference from males, the media contribute to the limiting of women's full potential as athletes. Power is central to all of these media constructions — power of choice and power of access to resources, opportunities, and identities as athletes.

Mary Duquin argues that women are discovering how involvement in sport can become an important tool for gaining a sense of mastery and competence. Sport can be an ideal setting for establishing and experiencing feelings of self-worth and empowerment.160 Through the physical, social, and intellectual challenges of sport, women, like men, learn about their own physical potential, test their own ambitions, goals, and dreams, and realize their abilities to create their own destinies. Consistent with this line of thinking, Catherine MacKinnon argues that women have been systematically excluded from sport precisely because patriarchal culture requires that women see and experience their bodies as weak and disabled. When women become physically active "it has meant claiming and possessing a physicality that is our own . . . physical self-respect and physical presence that women can get from sport is antithetical to femininity. It is our bodies as acting rather than as acted upon."161

Media constructions of female athleticism prevent women's physicality from leading to self-respect. As discussed throughout this Article, the media construct images that ignore the depth and breadth of the participation of women in sport by focusing on their physical and sexual appeal. They cover primarily those sports that do not threaten traditional notions of appropriate physical activity for women, and label as lesbians those athletes who do engage in so-called masculine sports. The media transform the full range of

159. Duncan & Sayaovong, supra note 51, at 112.
women's physicality and empowerment into oppressive stereotypes of femininity, commodification, and sexual exploitation. As a result, the media not only focus on, but dictate and legitimate, the ways in which female athletes and their bodies are acknowledged.\textsuperscript{162}

Some will argue that the media simply respond to the interests and desires of its audience. This argument, however, starts from the assumption that women do not represent a large portion of the viewing and reading audience, and therefore the media should continue to respond to a predominantly male interest base. There are a number of problems with this latter position. To begin with, a significant number of women are interested in sports. In 1994, approximately 25\% of all \textit{Sports Illustrated} subscribers were female.\textsuperscript{163} Also, the women's NCAA basketball championship, held in Minneapolis in April 1995, marked the third consecutive sell-out for this event. The seating capacity of the arena in which the tournament was held is 17,500.\textsuperscript{164} Although there is no way of ascertaining an accurate headcount of male and female viewers, it seems safe to assert that a large portion of the fan base of women's athletics is female. I would argue that even when the media anticipate and address the interests of female audiences, the motivation to give more coverage to women's sports is often fueled by a positive response from male viewers. For example, when ABC recently aired a one hour special about women's sports called "A Passion to Play," the network expected positive feedback from female viewers but instead got stacks of mail from male viewers "happy to see positive role models for their daughters."\textsuperscript{165} One can only discern from its surprise that ABC expected to have a predominantly female audience. Such a strong reaction from male viewers has convinced ABC to air four more specials on women's sports, presumably because it decided that the fan base is quite broad.\textsuperscript{166}

I am not arguing that women, relative to men, make up an equal part of a sports fan base. It is nevertheless important to point out that women rarely see themselves in sports media. And given the manner in which they see themselves portrayed when they do appear, we should not be terribly surprised to discover that women are not as interested as men are in sports. After decades of resistance, trivialization, stigmatization, and hostility toward female sport involvement, what we need to keep in mind is not how few women are interested in sports but how many are actually interested.

The argument that the media simply respond to viewer demands also completely ignores the role that the institution plays in shaping those desires. According to Nancy Theberge and Alan Cronk, "the media form a powerful institution that does not simply reflect but indeed shapes perceptions

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\item \textsuperscript{162} See Kane & Greendorfer, \textit{supra} note 9, at 40.
\item \textsuperscript{163} Telephone Interview with Johnette Howard, Journalist, \textit{Sports Illustrated} (Mar. 1995).
\item \textsuperscript{164} Telephone Interview with Chris Voelz, Director of Women's Athletics, University of Minnesota (Mar. 1995).
\item \textsuperscript{165} Rachel Blount, \textit{Women's Program Brings Big Reaction}, \textit{STAR TRIBUNE} (Minneapolis, Minn.), Nov. 18, 1994, at C2.
\item \textsuperscript{166} Although I applaud ABC for deciding to air more specials on women's sports, I am nevertheless troubled by the implication that if they had just received responses from women, they would have been far less interested in responding to the desires of their audience. Apparently, the only barometer that really matters to ABC is what male viewers think.
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and behaviors." Additionally, Jan Rintala and Susan Birrell contend that "[t]he assumption that media have an effect upon the audience is widespread. It underlies the billion-dollar advertising industry and provides the basic argument for those who advocate censorship." Moreover, even in those instances where the media are responding to the wishes of their audience, it is nevertheless the case that any portrayal that devalues individuals is inappropriate. As my colleague Janet Parks and I have pointed out, although the majority of Sports Illustrated's readership happens to be white and Christian, the editors do not have license to create images that are racist or anti-Semitic. Why do we require less when it comes to gender?

Numerous scholars argue that the media are obliged to treat sports-women fairly, reflecting the reality of women's sport involvement. Duncan and Hasbrook state that the media are more than a reservoir of social values and norms regarding women's athleticism. The media have enormous potential for influencing and changing larger social ideologies and practices. We have begun to see examples in which the media appear to be responding to criticism by portraying women as athletes rather than as caricatures. One such example was when women's basketball commentator Steve Physioc re-named "man-to-man" defense as "player-to-player" defense. One could argue that Physioc's use of "player-to-player" is a linguistic recognition that something significant has happened to basketball — it is no longer only a man's game. (See Figure 3).

169. Kane & Parks, supra note 64, at 147.
170. Duncan & Hasbrook, supra note 38, at 20.
171. Messner et al., supra note 96, at 230.
172. Id. at 231.
Figure 3: An Example of The Reality of Women's Sport Participation:
(See Kenny Moore, SPORTS ILLUSTRATED, Oct. 3, 1988, at 29. "Proving her point. Jackie Joyner-Kersee fulfilled expectations in winning the heptathlon." Id.)
It is important to recognize that there will be resistance to change. This resistance will come from women as well as from men. Recently, the authors of a widely publicized study on television coverage given to women's and men's sports released their findings at a national press conference and encountered a surprising response from USA Network commentator Diana Nyad, a former world record holder in long distance ocean swimming. She argued that the difference between commentators' use of first and last names in women's and men's professional tennis was not a result of sexism, but occurred instead because women tennis players on the pro circuit are more likely to be teen-aged girls.173 The authors of the study countered with the fact that, in the tennis matches they examined, the range of ages for the male players was nineteen to twenty-nine (with the mean age 22.8), while the range of ages for female players was nineteen to thirty-two (with the mean age 24).174

As women gain recognition and status in sport they will threaten the established order of male dominance. For example, in 1995, at the University of Connecticut, both the women's and men's basketball teams were ranked number one in the country and both teams enjoyed capacity crowds during their respective games. However, the men's head coach, Jim Calhoun, clearly resented the women's success. He told a reporter that having his team's accomplishments compared to those of the women's team is like having "mosquito bites," meaning irritating.175 It was also reported that when Calhoun encountered the crowd departing from a women's game, he remarked that the University would have to set up a senior-citizens home and daycare center for the fans attending the women's basketball game.176

Men have long cherished the sport experience. This is something that, until very recently, has been denied to women on a large scale basis. Yet, as we move toward the twenty-first century, it is possible that attributes such as physical strength, risk-taking behavior, and muscular development, once the exclusive domain of men, can become new and liberating ways to present oneself as unapologetically female.177 Although I certainly support this notion, I further argue that until young girls and women are seen, and see themselves, in ways that reflect the diversity of their sport experience, from grace and beauty to physical strength and power, they will not receive the admiration, dignity, and respect that they so richly deserve. As we have seen, women are already breaking down historical barriers to their sport involvement. As scholars and educators we should challenge the media to reflect that reality.

173. Id. at 225.
174. Id.
175. Patrick Reusse, U Conn's Family Feud, STAR TRIBUNE (Minneapolis, Minn.), Feb. 26, 1995, at 12C.
176. Id.