

EXHIBIT 3



September 18, 2026

BY ELECTRONIC MAIL (SAF.AA.HAF.FOIA.WORKFLOW@US.AF.MIL)

SAF/AAGI FOIA TEAM
Government Information Management Branch (SAF/AAGI)
Office of the Secretary of the Air Force
1000 Air Force Pentagon
Washington, DC 20330-1000

Re: FOIA Request AF 2026-07524-F

To Whom It May Concern:

On August 19, 2026, the American Civil Liberties Union and the American Civil Liberties Union Foundation ("ACLU"), the National Women's Law Center ("NWLC"), and the Service Women's Action Network ("SWAN") (together, "Requesting Parties") submitted to the Department of the Air Force a Freedom of Information Act ("FOIA") request for certain Department of Defense ("DoD") records (the "Initial FOIA Request").

On September 10, 2026, your office responded to the Initial FOIA Request by e-mail. *See* E-mail from Headquarters Air Force to Gillian Thomas (Sept. 10, 2026). The response informed us that the Initial Request had been assigned the above-referenced number, and explained, in pertinent part, that "your request, as currently written, is too broad in scope to allow for a meaningful search for records," and stated that "[t]o proceed, we require your assistance in narrowing the scope of your request." The e-mail sought, by September 18, 2026, additional details regarding "Record Locations," "Specific Document Types," "Specific Time Frame," and, for email correspondence, the "Custodians," "Senders/Recipients," and "Keywords."

This letter aims to provide the requested detail about the Initial Request, to the best of Requesting Parties' ability given publicly-available information.

The Initial Request – Summary and Context

By way of summary and to provide context, the Initial Request concerns a formal DoD review of women's "effectiveness" in ground combat (the "Formal Review"). According to news reports, on December 18, 2025, Under Secretary of Defense for Personnel and Readiness Anthony Tata issued a memorandum seeking data from some or all Military Departments on the readiness, training, performance, casualties and command climate of gender-integrated combat units. *See, e.g.,* Tom Bowman, *Pentagon will begin review of "effectiveness" of women in ground combat positions*, NPR (Jan. 7, 2026), <https://www.npr.org/2026/01/06/nx-s1->

[5667583/pentagon-review-women-in-ground-combat-roles](https://www.militarytimes.com/news/pentagon-congress/2026/04/14/pentagons-women-in-combat-review-reassigned-deadline-extended/). The Formal Review initially was to be conducted within 6 months by the Institute for Defense Analyses (“IDA”), but in April 2026, according to media accounts, the Formal Review was reassigned to the Johns Hopkins University Applied Physics Laboratory (“JHU/APL”) and extended to one year. *See, e.g.,* Hope Hodge Seck, *Pentagon’s women-in-combat review reassigned; deadline extended*, Military Times (Apr. 13, 2026), <https://www.militarytimes.com/news/pentagon-congress/2026/04/14/pentagons-women-in-combat-review-reassigned-deadline-extended/>. Reportedly, the lead researcher at JHU/APL is Jane Pinelis, Ph.D., Chief Scientist in the Special Operations Mission Area. *See* Sonner Kehrt, *Hegseth ordered a new study of women in combat. Critics say it’s built to reach one conclusion*, The War Horse (July 14, 2026), <https://thewarhorse.org/women-in-combat-review/>.

Additionally, according to DoD’s website, early in his tenure, on March 30, 2025, Secretary Hegseth issued a memorandum that “directed military departments to build plans that define and identify the combat arms and noncombat arms occupations within their respective military services” and directed those departments “to develop mission-focused physical fitness standards for those combat arms roles to ensure service members can meet the physical demands of a combat environment.” C. Todd Lopez, *Defense secretary directs services to match combat arms standards to mission requirements*, DOD News (Apr. 1, 2025), <https://www.war.gov/News/News-Stories/Article/Article/4142517/defense-secretary-directs-services-to-match-combat-arms-standards-to-mission-re/>. A copy of Secretary Hegseth’s March 30, 2025 memorandum is attached here as Exhibit A.

Additional Information to Aid in Narrowing the Scope of the Initial Request

Record Locations

Requesting Parties believe that the following agency offices, directorates, and/or personnel may be the originators or custodians of documents concerning the Formal Review that was initiated in December 2025 (Initial Request No. 1) and reassigned in or around April 2026 (Initial Request No. 2), and the directives contained in the March 30, 2025 memorandum (Initial Request No. 3), including the responsive documents submitted by the Air Force.

1. Office of the Secretary of the Air Force
2. Air Force Personnel Center, including but not limited to the Directorate of Military Assignments and Force Generation and the Directorate of Staff
3. Air Force Global Strike Command
4. Air Force Combat Command
5. Air Force Special Operations Command
6. Air Force Reserve Command

Specific Document Types

With respect to Initial Requests Nos. 1 and 2, Requesting Parties seek:

1. All records regarding the Formal Review, including the December 18, 2025 memorandum and any attachments, and any subsequent records reflecting the Formal Review's reassignment to JHU/APL, along with any execution orders issued and any amendments or directives attempting to modify the scope, requirements, or timeline, including those contained in written communications.¹
2. All records related to the design of the Formal Review, including but not limited to the criteria, standards, and processes used to select men and women participants, and any data and analysis to assess whether the men and women participants in the Formal Review were comparable in training, experience, occupational category, and baseline performance.
3. All records related to the scoring systems and evaluation frameworks used to determine the results of the Formal Review.
4. All records relating to the use of any analytical tools, artificial intelligence, model assumptions, validation methods, limitations, and data inputs of the Formal Review.
5. All records reflecting the Formal Review's reassignment from IDA to JHU/APL and the decisions to extend the review from 6 to 12 months and to include "field testing."

With respect to Initial Request No. 3, Requesting Parties seek the following records:

1. The March 30, 2025 memorandum and any attachments, and any subsequent records related to the directives detailed therein, including those contained in written communications.
2. All records comprising the "interim update on the development of [the Air Force's] plan" submitted by the Secretary of the Air Force and any sub-component entities, as directed by the March 30, 2025 Memorandum. *See* Ex. A, at 2.
3. All records reflecting "additional direction" provided by the Under Secretary of Defense for Personnel and Readiness "based on the interim update" described in Section 2, above. *See id.*
4. All records comprising the final plan(s) submitted by the Secretary of the Air Force and any sub-component entities, as directed by the March 30, 2025 memorandum. *See id.*

¹ For purposes of Request Nos. 1 and 2, the term "written communications" includes, but is not limited to, letters, notices, guidance, memoranda, instructions, e-mails (and attachments thereto), and text and/or audio messages (including, but not limited to, those sent through the Payment Management System or other platforms, such as iMessage, Signal, WhatsApp, Microsoft Teams, Zoom, Slack, Facebook, X, or Truth Social).

5. All records relating to the “full implementation of [the Air Force’s] plans,” as directed by the March 30, 2025 memorandum. *See id.*

Specific Time Frame

With respect to the Formal Review that is the subject of Initial Requests Nos. 1 and 2, as Requesting Parties have noted, the initiating memorandum was issued on December 18, 2025, with an assigned duration of 6 months (i.e., until June 18, 2026), and the reassignment of the Formal Review occurred in or around April 2026, with an extended duration of one year (i.e., until April 2027).

With respect to the memorandum that is the subject of Initial Request No. 3, Requesting Parties seek responsive documents dating from the memorandum’s March 30, 2025 issuance. As noted in the memorandum itself, Secretary Hegseth directed that interim updates be submitted by the Military Departments within 30 days (i.e., by April 29, 2025), and that final plans be submitted within 60 days (i.e., by May 29, 2025). *See* Ex. A. at 2. Additionally, the Under Secretary of Defense for Personnel and Readiness was directed to “provide additional direction based on the interim update,” *id.* (i.e., after April 29, 2025). Finally, “full implementation” of any plans submitted was to occur “within six months of submission” (i.e., by November 29, 2025 at the latest).

Requesting Parties would urge, however, that the above deadlines only serve as rough estimates of the time frame during which responsive documents may be identified, given the volume of material to be gathered and synthesized, and given that the “full implementation” of the final plans presumably would occur on a rolling basis. Requesting Parties believe it is appropriate that the applicable timeframe for responsive documents continue through the present.

Email Correspondence

Custodians: Requesting Parties believe that personnel with the following entities are custodians of e-mails responsive to the Initial Request:

1. Office of the Secretary of the Air Force
2. Air Force Personnel Center, including but not limited to the Directorate of Military Assignments and Force Generation and the Directorate of Staff
3. Air Force Global Strike Command
4. Air Force Combat Command
5. Air Force Special Operations Command
6. Air Force Reserve Command

Senders/Recipients: In addition to the relevant personnel at the above entities, Requesting Parties believe the following entities and individuals are senders and/or recipients of e-mails responsive to the Initial Request:

1. Office of the Secretary of War
2. Office of the Secretary of War and Joint Staff
3. Office of the Under Secretary of Defense for Personnel and Readiness
4. The Institute for Defense Analyses
5. The Johns Hopkins University Applied Physics Laboratory
6. Jane Pinelis, Ph.D.

7. Johns Hopkins University Applied Physics Laboratory Special Operations Mission Area

Keywords: In addition to any keywords that the Air Force's review of responsive documents reveals are appropriate, with respect to the Formal Review (Initial Requests 1 and 2), Requesting Parties note that at least one news outlet has identified the review's official title as the "Performance, Readiness, and Integrated Mission Effectiveness Assessment." Hodge Seck, *Pentagon's women-in-combat review reassigned*, *supra* page 2.

With respect to the March 30, 2025 memorandum, the memorandum itself contains details that may assist in identifying search terms. For instance, the memorandum specifically seeks information regarding Ground Combat Operations, Special Operations Forces and Specialized Occupations; the personnel likely to have responsive documents should be known to the Air Force.

The Requesting Parties also suggest that Air Force Specialty Codes in the following combat career fields be utilized as search terms:

1. Special Warfare (Enlisted 1Z AFSCs), including but not limited to Pararescue (1Z1X1); Combat Control (1Z2X1); and Tactical Air Control Party (1Z3X1);
2. Operations and Combat (Officer 11X/18X AFSCs); and
3. Combat Support and Enabling AFSCs.

Thank you for the opportunity to submit this additional information. Please do not hesitate to contact me if I may provide additional information.

Respectfully submitted,



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EXHIBIT A



SECRETARY OF DEFENSE
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WASHINGTON, DC 20301-1000

MAR 30 2025

MEMORANDUM FOR THE SECRETARIES OF THE MILITARY DEPARTMENTS

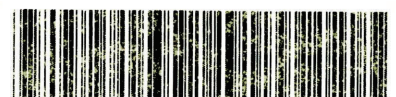
SUBJECT: Combat Arms Standards

The United States military's strength is rooted in its unwavering commitment to high standards that foster discipline, unity, and purpose. It is these principles that have made our fighting force the most formidable in the world. As the nature of warfare evolves and the demands on our Service members grow more complex, it is imperative that we assess and refine the physical fitness standards that enable our readiness and lethality.

I am directing the Secretaries of the Military Departments to develop comprehensive plans to distinguish combat arms occupations from non-combat arms occupations. This effort will ensure that our standards are clear, mission-focused, and reflective of the unique physical demands placed on our Service members in various roles.

Combat Arms vs. Non-Combat Arms Occupations. The Military Department's plans must clearly define combat arms occupations and non-combat arms occupations. Additionally, for certain combat arms roles, it is essential to identify which positions require heightened entry-level and sustained physical fitness. These roles, which are critical to our military's mission success, demand exceptional physical capabilities, and the standards for them must reflect that rigor. Therefore, plans must address:

1. **Ground Combat Occupations.** Standards for ground combat occupations should emphasize the ability to carry heavy loads, endure prolonged physical exertion, and perform effectively in austere, hostile environments. Service members in these roles must exhibit speed, strength, agility, and endurance to navigate the demands of combat situations.
2. **Special Operations Forces (SOF) Occupations.** The standards for SOF occupations must be equally rigorous, incorporating advanced swimming, climbing, parachuting, and the ability to operate in extreme environments. Sustained peak physical performance is essential to execute missions of the highest stakes across diverse and challenging terrains.
3. **Specialized Occupations.** For specialized occupations like Navy Divers and Explosive Ordnance Disposal Technicians, the focus should be on proficiency in those unique and demanding tasks such as aquatic rescue, repair, and demolition. Sustained endurance is necessary to tackle long hours in physically and mentally taxing conditions.



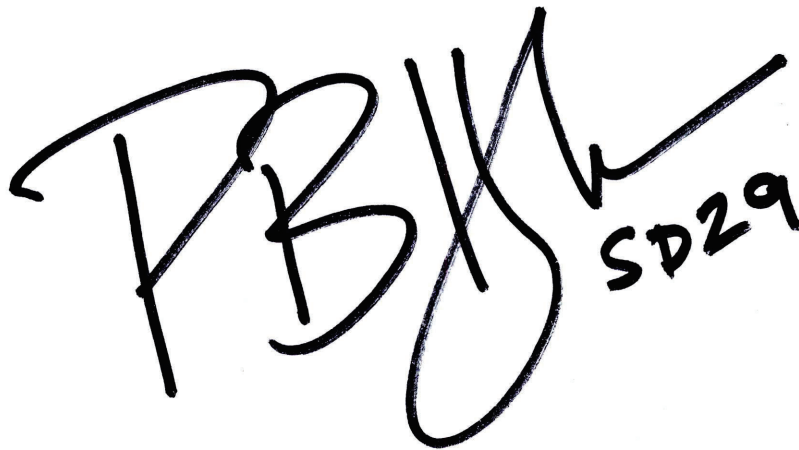
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Sex-Neutral Standards. All entry-level and sustained physical fitness requirements within combat arms positions must be sex-neutral, based solely on the operational demands of the occupation and the readiness needed to confront any adversary. In establishing those standards, the Secretaries of the Military Departments may not establish standards that would result in any existing Service member being held to a lower standard. *

To ensure the effectiveness of these plans, I am directing the Secretaries of the Military Departments to submit their proposals to the Under Secretary of Defense for Personnel and Readiness (USD(P&R)) within 60 days of this memorandum. The Secretaries of the Military Departments will provide an interim update on the development of their plan to the USD(P&R) within 30 days. The USD(P&R) has the authority to provide additional direction based on the interim update.

Full implementation of these plans must occur within six months of submission. This initiative aligns with my broader directive to maintain uncompromising and clear standards that ensure the continued dominance of our military.

This review is a necessary step to strengthening the readiness of our forces and preparing for the future. It will demonstrate how our department continually adapts to meet evolving challenges and ensure operational excellence. I trust in your commitment to upholding the principles that define us as the world's most lethal and effective fighting force.

A large, stylized handwritten signature, likely 'RBJ', is written in black ink. To the right of the signature, the text 'SD29' is written in a similar style. An arrow points from the 'SD29' text towards the signature.

* no existing standard will be lowered in this process.