Chapter 3: The Voice of a Woman

Samuel, an Amoraic sage (Babylonia, 3rd century C.E.) famously stated *kol b’isha ervah* or “the voice of a woman is *ervah*,” loosely translated as “uncovered nakedness.” One’s voice however, cannot be naked in the same way that hair and body parts can be uncovered and exposed. A more accurate interpretation might be indecent exposure to a source of sexual intimacy, with the woman’s voice constituting the source. The prohibition is often associated with the singing voice of a female over the age of 9-11 years but according to some authorities, it can extend far beyond that. For instance, the voice of a woman (hereafter: *kol isha*) might include women saying the mourner’s prayer (hereafter: *kaddish*) aloud in a synagogue or speaking words of Torah or offering eulogies, in spaces that include both women and men.

The halakhic perspective on this issue is yet another component of the meta-halakhic conversation regarding female identity in Orthodox Judaism and how religious society seeks to desexualize both sacred and non-sacred spaces. As mentioned in previous chapters, issues of Jewish identity for women and modes of dress often reflect religious commitment, identity and communal affiliation. There are empowering aspects to the choices women make regarding dress and hair covering, and, in the end, they largely do not interfere with social interactions within the Orthodox community even if women choose to reject the dress acceptable to communal religious norms.

*Kol isha* is different in several ways. First, this restriction is not about religious identity per se. Instead, it is a law that focuses on the female voice solely as a trigger for potential male sexual arousal. In consequence, there is nothing to be gained for women’s religious practice outside of protecting men from sexual distraction.

A popular Jewish website aimed at explaining Judaism to those less affiliated presents this concern as it shares the perceived ideology behind the restriction:[[1]](#footnote-1)

Men and women have different criteria for sexual arousal. Hearing a woman sing is sexually arousing for a man….While it might be hard for a woman to imagine such a thing, the Sages are very in tune with human nature – and this rule has been observed by Jews for thousands of years. So with this in mind, when the Torah sets up barriers to protect society's moral fabric, the emphasis was placed to counter the reality of man's weaker character in these areas. Hearing the pleasant melody of a women singing is just one way a man could become aroused, therefore he should avoid this medium, given that we are obligated to refrain from exposing ourselves to erotic situations.

There is a certain dissonance inherent in this argument given how prevalent verbal interactions are between men and women even within insular Orthodox communities. If men are familiar with women’s voices, even a beautiful voice raised in prayer or meaningful song should not lead to sexual thoughts – unless by deeming it such, we sexualize it from the outset. Furthermore, *kol isha* is exclusionary in a way that privileges men. Preventing women from speaking in front of men, or singing together with or in front of men, is tantamount to silencing them or rendering them invisible. It can block women from active participation at professional, social, communal and national events in synagogues and schools – and, in some cases, even at the Shabbat table.

A look at contemporary halakhic literature heightens this reflexively negative response to women’s voices. However, as we will see, there is much room to re-evaluate this particular prohibition, especially in mainstream Orthodox communities.

# Part One: Samuel’s Statement

The Talmudic text in tractate Berakhot serves as the main source for the introduction of women and *ervah* into rabbinic discourse on this topic.[[2]](#footnote-4)

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| Berakhot 24aSamuel stated: A woman’s voice is considered nakedness, as it is stated: “Sweet is your voice and your countenance is alluring” (Song of Songs 2:14). | ברכות דף כד עמ' אאמר [שמואל](https://he.wikisource.org/wiki/%D7%A7%D7%98%D7%92%D7%95%D7%A8%D7%99%D7%94%3A%D7%A9%D7%9E%D7%95%D7%90%D7%9C_%28%D7%90%D7%9E%D7%95%D7%A8%D7%90%29%22%20%5Co%20%22%D7%A7%D7%98%D7%92%D7%95%D7%A8%D7%99%D7%94%3A%D7%A9%D7%9E%D7%95%D7%90%D7%9C%20%28%D7%90%D7%9E%D7%95%D7%A8%D7%90%29): קול באשה ערוה, שנאמר: ״כִּי קוֹלֵךְ עָרֵב וּמַרְאֵךְ נָאוֶה״. |

When the Babylonian Talmud quotes Samuel stating that the voice of a woman is nakedness, it does not cite a verse from the Torah to support his statement, but a poetic expression of love from a verse in Song of Songs, “Sweet is your voice and your countenance is alluring.” The verse, however, does not give us specific information about the voice being described. In this chapter of Song of Songs, the woman is the main speaker. It is she who recalls the time that her beloved described her voice as sweet and her appearance as alluring. Throughout the chapter, she describes their elusive love for one another and the yearning for the connection they ardently seek. There is no indication that the voice described is of one singing.

Samuel’s statement is grounded in the language of the male (as recalled by the female) but it is not clear to what end he is making this assertion. It is likely that the usage of the verse reflects the tonal differences between male and female voices, of which the latter are typically higher pitched than the former and therefore, attractive to men.[[3]](#footnote-5) It is also possible that Samuel’s statement is to be understood in context. Song of Songs is a book with erotic allusions. Perhaps the suggestion is that erotic conversation between men and women is analogous to *ervah*. The text does not have any obvious practical application other than a warning against the latent promiscuity embedded in all potential encounters between men and women. This understanding is reinforced by studying two other places where Samuel’s statement is cited in the Talmudic corpus.

The first reference appears in the Jerusalem Talmud where the permissibility of a woman performing the mitzvah of separating hallah while naked is considered. We examined the entire text in the first chapter, here we will focus on the teaching of Samuel:

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| Jerusalem Talmud, Hallah, 2:1Samuel said: Hearing the voice of a woman is forbidden on grounds of *ervah*. What is the reason? “It shall be that from the voice of her whoring, the land will be polluted” (Jer. 3:9). | ירושלמי חלה, פרק ב הל' א שמואל אמר: קול באשה ערוה. מה טעם? "וְהָיָה מִקּוֹל זְנוּתָהּ וַתֶּחֱנַף הָאָרֶץ וְגוֹ׳."  |

The verse from Jeremiah quoted in the Jerusalem Talmud as Samuel’s prooftext gives far more insight into his statement than the verse in Song of Songs, since it actually refers to a “voice of whoring” in the sense of prohibited sexual relations. In the passage in tractate Hallah, Samuel’s statement comes immediately after a Tannaitic text about how a man who gazes at the body of an *ervah* it is as if he engaged intercourse with her. Although performing and an action that is like intercourse is not legally the same as actually having intercourse, this statement reveals the Talmud’s understanding that visual stimuli can inflame a man’s desire and create a framework that might lead to prohibited intercourse. Placing Samuel’s statement immediately after this teaching suggests that not only is visual stimulation dangerous, audible stimulation can be as well. No distinction is made between the speaking or singing voice. What seems relevant is the context of the voice and content of the conversation.[[4]](#footnote-6)

Samuel’s statement appears in one more place in the Talmud.

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| קידושין דף ע עמ' א אמר ליה: תיתי דונג תשקינן. אמר ליה, הכי אמר שמואל: אין משתמשים באשה. קטנה היא! בפירוש אמר שמואל: אין משתמשים באשה כלל, בין גדולה בין קטנה.נשדר ליה מר שלמא לילתא. א"ל, הכי אמר שמואל: קול באשה ערוה. אפשר ע"י שליח! א"ל, הכי אמר שמואל: אין שואלין בשלום אשה. על ידי בעלה!אמר ליה: הכי אמר שמואל: אין שואלין בשלום אשה כלל. | Kiddushin 70aRav Naḥman said to him: Let my daughter Donag come pour us drinks. Rav Yehudah said to him: This is what Shmuel says: One may not make use of a woman. Rav Nahman: She is a minor. Rav Yehuda retorted: Samuel explicitly says: One may not make use of a woman at all, whether she is an adult or a minor. Rav Naḥman suggested: Let the Master send peace to my wife Yalta.Rav Yehudah said to him: This is what Samuel says: A woman’s voice is *ervah*.Rav Naḥman responded: Via a messenger. Rav Yehuda said to him: This is what Samuel says: One may not send greetings to a woman (even with a messenger).Rav Naḥman countered: with her husband!Rav Yehudah said to him: This is what Samuel says: One may not send greetings to a woman at all.  |

The context of this discussion is conversation, specifically the extending of greetings to a married woman via her husband. Rav Yehudah repeatedly rejects Rav Nahman’s attempts to involve his daughter Donag and his wife Yalta in the hospitality extended towards him. Rav Yehudah quotes Samuel over and over again while rejecting all of Rav Nahman’s seemingly moderating suggestions. This excerpt is part of a longer conversation between Rav Nahman and Rav Yehudah in which the latter continuously quotes Samuel while correcting Rav Nahman’s teachings on various topics. Samuel’s teachings about women appear in the middle of this textual unit.

This source, in which Rav Yehudah quotes Samuel saying that the “voice of a woman is *ervah*” stands as a “fortified wall,” to quote modern rabbinic authority Rabbi Mosheh Lichtenstein, against any attempt to distinguish between different kinds of voices, since it is clear that what is under discussion is a greeting. In other words, the Talmud understands Samuel’s statement as restrictive of all conversation with women by identifying the voice of a woman as *ervah*.[[5]](#footnote-7) Even the suggestion of encountering a woman’s voice via her husband is considered by Rav Yehudah in the name of Samuel as *ervah*, serving as a stern warning against all conversation between men and women.[[6]](#footnote-8)

To summarize, Samuel’s statement appears in three places in rabbinic literature, with none of them directly referring to singing. Post-Talmudic interpretation of the sources will be paramount in extracting practical applications, since the Talmudic statements themselves give no such clarity.

# Part Two:

A second selection of Talmudic sources is also relevant to this discussion. These sources present an attitude of suspicion about song in general and have less to do with women singing but they are important nonetheless for our analysis.

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| Mishnah Sotah 9:11When the Sanhedrin ceased, song ceased from the places of feasting, as it is said, “They drink their wine without song” (Isaiah 24:9)Sotah 48a (translation Sefaria and Jastrow)Rav Huna said: the song of boat haulers and plowers is permitted, of the weavers is forbidden… Rav Yosef said: men singing with women answering [constitutes] immodesty; women singing with men answering is like [setting] fire to sawdust. What is the practical distinction [between the two]? The abolishment of the [latter] should precede the [former]. Rabbi Yohanan said: Anyone who drinks accompanied by four musical instruments – brings upon the world five punishments, as it is written (Isaiah 5:11): “Woe to those who rise early in the morning, pursuers of strong drinks, who stay up late into the night; wine will inflame them, and it will be that the fiddle and the harp, the drum and the pipe, and wine at their parties, and they will not behold the actions of God…” | משנה סוטה פרק ט משנה יאמשבטלה סנהדרין, בטלה השיר מבית המשתאות, שנאמר: בַּשִּׁ֖יר לֹ֣א יִשְׁתּוּ־יָ֑יִן וגו'. מס' סוטה דף מח עמ' אאמר רב הונא: זמרא דנגדי ודבקרי שרי דגרדאי אסיר... אמר רב יוסף: זמרי גברי ועני נשי פריצותא. זמרי נשי ועני גברי כאש בנעורת.למאי נפקא מינה?לבטולי הא מקמי הא.אמר ר' יוחנן כל השותה בארבעה מיני זמר מביא חמש פורעניות לעולם שנאמר: "ה֛וֹי מַשְׁכִּימֵ֥י בַבֹּ֖קֶר שֵׁכָ֣ר יִרְדֹּ֑פוּ מְאַחֲרֵ֣י בַנֶּ֔שֶׁף יַ֖יִן יַדְלִיקֵֽם׃ וְהָיָ֨ה כִנּ֜וֹר וָנֶ֗בֶל תֹּ֧ף וְחָלִ֛יל וָיַ֖יִן מִשְׁתֵּיהֶ֑ם וְאֵ֨ת פֹּ֤עַל יְהֹוָה֙ לֹ֣א יַבִּ֔יטוּ..." |

In this source, we read about the tremendous mourning experienced in the aftermath of the destruction of the Sanhedrin and the Temple. The Mishnah tells us that song ceased. The Talmud then tries to understand what kind of song ceased. Is it all song or only overly joyful or promiscuous song? Different Talmudic sages from the 4th and 5th century CE in the land of Israel and Babylonia are brought into conversation around the general topic of music and song. Rav Huna explains that boat haulers and plowers can continue to sing but weavers are prohibited.[[7]](#footnote-9) Rav Yosef cautions harshly against men singing with women answering (in song) and women singing with men answering. He calls the former immodest and the latter he describes as setting fire to sawdust, presumably because of the potential conflagration when the women and men interact in such a way. The Talmud does not pause to define the type or content of the songs being sung, nor does it quote Samuel saying the voice of a woman is *ervah*. In the next passage it quotes Rabbi Yohanan who warns against drinking and listening to musical instruments, for that will bring calamity to the world. The Talmud then moves to the next part of the Mishnah which has nothing to do with song or with women.

In modern discourse, the line quoted from tractate Sotah about men singing with women and women singing with men is cited as another source that prohibits *kol isha*, but it is misleading to quote those lines out of context. No connection is made to Samuel’s statement or to *ervah*, nor are any proof texts from Scripture cited. In the parallel passage in the Jerusalem Talmud, there is no direct reference to plowmen, weavers, or men and women, but there is a reference to the type of song that must be eradicated in the absence of the Sanhedrin:

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| Jerusalem Talmud Sotah 9:12[Rav Hisda](https://d.docs.live.net/topics/rav-chisda) said, in earlier times the fear of the Sanhedrin was on them and they did not include lewd language in song. But now when the fear of the court is no longer on them they include lewd language in song. | תלמוד ירושלמי מס' סוטה פרק ט' הל' יבאמר רב חסדא בראשונה היתה אימת סנהדרין עליהן ולא היו אומרים דברי נבלה בשיר.  אבל עכשיו שאין אימת סנהדרין עליהן הן אומרים דברי נבלה בשיר. |

The Jerusalem Talmud seems to clarify the overarching concern in the Babylonian Talmud. The problem, according to the Jerusalem Talmud, is the content of the songs rather than the identity of the singers. Read together with the Babylonian Talmud’s teaching, the concern is about the content and context of song leading to immodest interaction between men and women. This has the potential to lead to promiscuity, a consistent theme in rabbinic literature.

Another source worth noting is a passage in Gittin:

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| Gittin 7a They sent to Mar Ukva: From where do we know song is forbidden [following the destruction of the Temple]? He… wrote to them: “Rejoice not, O Israel, to exultation, like the peoples” ([Hosea 9:1](https://www.sefaria.org.il/Hosea.9.1)).And let him send them from here: “They do not drink wine with a song; strong drink is bitter to them who drink it” ([Isaiah 24:9](https://www.sefaria.org.il/Isaiah.24.9))?If [he had answered by citing] that verse, I would say this matter applies only to instrumental music, but vocal song is permitted. [Therefore, Mar Ukva] teaches us [that all types of song are forbidden]. | מס' גיטין דף ז עמ' אשלחו ליה למר עוקבא: זמרא מנא לן דאסיר? שרטט וכתב להו: "אַל־תִּשְׂמַ֨ח יִשְׂרָאֵ֤ל ׀ אֶל־גִּיל֙ כָּעַמִּ֔ים." ולישלח להו מהכא: "בַּשִּׁ֖יר לֹ֣א יִשְׁתּוּ־יָ֑יִן יֵמַ֥ר שֵׁכָ֖ר לְשֹׁתָֽיו"? אי מההוא הוה אמינא הני מילי זמרא דמנא אבל דפומא שרי. קא משמע לן.  |

In this source, all instrumental music and song is prohibited in order to eliminate unbridled joy, even at moments of happiness. The subject of women is not discussed at all. Still, it serves to reinforce the Sotah text that closes with a blanket restriction on music after the destruction of the Temple. In short, while one statement by Rabbi Yosef in the Sotah text restricting men and women from singing to one another, there are many more statements regarding significant restrictions on music and song. An attempt to uphold these limitations well into the post-Talmudic era was untenable. Despite the destruction of the Temple which was supposed to etch eternal mourning into our daily lives, Jewish communities embraced joyous singing – even in setting where drinking takes place – at religious events and on the Sabbath.

Returning to the subject at hand, it seems fairly clear from the text that the concern relates to songs containing giddiness and immodesty, inasmuch as Rav Yosef’s statement is situated between Rav Huna who denounces the weavers’ songs and Rabbi Yohanan who warns against drinking accompanied by music. Women and men singing together increases the frivolity and potential licentiousness. The discourse has little bearing on any practical halakhic conversation around the parameters of *kol isha* except to caution against immodest lyrics or behavior while singing.

One last relevant Talmudic source will be brought in this section. In tractate Megillah, the Talmud addresses the question of women reading megillah for men and, in a separate source, women being called up to Torah. With regard to reading the megillah, in both tractate Megillah and, more significantly, in tractate Arakhin, the Babylonian Talmud concludes that women are obligated in megillah reading and are halakhically capable of reading for the community, including its men. With regard to Torah reading, the text reads as follows:

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| Megillah 23aThe Sages taught: All people count toward the quorum of seven readers, even a minor and even a woman. However, the Sages said that a woman should not read the Torah, out of respect for the congregation (*kevod tzibbur*). | מסכת מגילה דף כג עמ' א תנו רבנן: הכל עולין למנין שבעה ואפילו קטן ואפילו אשה. אבל אמרו חכמים: אשה לא תקרא בתורה מפני כבוד צבור. |

It is certainly noteworthy that none of the sources relating to women reading the megillah or the Torah mention Samuel’s statement that a woman’s voice is *ervah* to justify restricting reading either the Torah or the megillah by women in public.

To summarize, the Talmudic sources cited above refer to post-Temple restrictions and concerns for debauchery stemming from songs with inappropriate and crude content. The Talmud takes a strict position against song and music at all gatherings, particularly those involving wine and women. It appears that in Tannaitic times, Jews were ordered to completely abstain from music as a sign of mourning. In Amoraic times, the rabbis tried to dissuade people from engaging in song and music with only a few exceptions. From both Talmudic and post-Talmudic sources, it seems that they were never completely successful in eradicating music and song – even frivolous song – from Jewish celebrations.[[8]](#footnote-10) These sources do not relate to the halakhic issue of women singing. It is unequivocal that songs of a sexual, licentious nature are prohibited both in single-sex and mixed company. Still, this does not imply any prohibition of women singing songs of a non-sexual nature such as folk songs, religious songs or lullabies. The Talmud does not raise the issue of *kol isha* with regard to megillah reading by women for men or women reading Torah in synagogue. It would appear that *kol isha* was not viewed as a reason to restrict these practices.

# Post-Talmudic Interpretation

Having analyzed these Talmudic texts, it remains to be determined what the halakhic implications are for women speaking or singing in mixed company.

Is a woman’s voice always considered *ervah* as suggested by the source in Kiddushin?

On the other hand, given the source in Berakhot, perhaps it is only when a man is saying Shema?

Is there any significant difference between a woman’s speaking or singing voice that can be established based on other Talmudic sources?

The practical status of the different statements regarding a woman’s voice was a matter of discussion among the *rishonim*, the post-Talmudic authorities who continued to interpret and institute halakhah in the years 1000-1500 CE. Roughly speaking, three schools of thought emerged. The first rejected the entire premise of *kol isha* as being halakhically irrelevant.[[9]](#footnote-11) The second saw it as relevant only within the context of the laws of Shema when defining *ervah* translates into applied halakhah. Still, familiarity and habituation can neutralize the *ervah* component of a woman’s voice, including her singing voice. The third approach shows concern that the voice of a woman serves as a sexual trigger for a man if the man has intent to derive pleasure from her voice.

## Approach Number One: Habituation Neutralizes Sexualization Even During Shema

The focus of much of the early discourse regarding the definition of *ervah* revolved around the recitation of Shema and what prevents a man from saying Shema. In this context, the *shok*, voice and hair of a woman were categorized as *ervah* during the recitation of Shema, even when these belong to a man’s wife who is intimately familiar to him. This school of thought includes some of the earliest commentaries on the Talmud. For example, Rav Hai Ga’on (10th century) wrote that a man should not say Shema when a woman is singing but, if she is talking normally, or if he can concentrate while she is singing, it is permitted.[[10]](#footnote-12) Rabbeinu Hananel (10th century), points out that even though women’s voice is not seen, it can nonetheless stimulate. However, he argues, if the man is accustomed to the voice of a woman, it is not a problem.[[11]](#footnote-13) Both of these commentators would permit a man’s wife to be present and vocal even while he is saying Shema, without concern for distraction.

The idea that habituation or familiarity can potentially desexualize interaction between men and women was fully developed in Chapter Three where *ervah* was defined and analyzed. We have seen that if a man is accustomed to the exposure of certain parts of a woman’s body, like her hands, feet and face, then there is no concern for arousal. The voice of a woman must also be considered within this context. We can conclude that habituation can neutralize the male yetzer or sexual drive. This approach opens greater possibilities for casual interaction between the sexes and, more specifically, the opportunity for women to sing in front of men.

An important example of this approach with reference to a woman singing is found in the commentary of Rabbeinu Yonah, (12-13th century), where he claims, at first, that both Shema and other holy pursuits should be prohibited in the presence of a woman’s singing voice but then admits “that because of our sins we sit among the gentiles and are forced to hear the Aramean (= non-Jewish) women singing and this is no longer a deterrent to learning Torah.” In other words, hearing the non-Jewish women singing should have prevented men from praying or learning because of direct exposure to *kol isha* which is *ervah*. Rabbeinu Yonah recognizes, however, that habituation neutralizes this as a sexual deterrent even when focusing on a holy ritual.

This methodology is central to the interpretive approaches of many important early rabbinic authorities.[[12]](#footnote-14) In all of the related sources, familiarity and normal exposure serve to desexualize what was previously defined as *ervah*. These include parts of the body normally uncovered (face, hands, feet), the hair of an unmarried women or the hair that escapes a married woman’s veil and a woman’s voice, often without distinction between the speaking and singing voice of a woman.

## Approach Number Two: Women’s Voices Are Fundamentally Sexual if Men Intend to Derive Pleasure

There are several responsa presented by Ge’onic sages condemning the practice of women entertainers performing at men’s gathering, that do not rely on the trope “the voice of a woman is *ervah*.” The tenor of the mixed interaction seems to determine its prohibitive nature rather than Samuel’s statement, which, in Geonic literature, only seems to be relevant with regard to the laws of Shema.[[13]](#footnote-15) This halakhic approach fits well with the Talmudic sources in Sotah, Gittin and the Jerusalem Talmud where lyrics with obscenity or frivolity in mixed company are condemned out of concern for behavior that will lead to promiscuity.

Similarly, in a responsum regarding Jewish men listening to Arab women singing, Maimonides protests the practice because of the content of the songs and the wine being consumed. He does, cite Samuel’s statement: “the voice of a woman is nakedness…even more so if the woman is singing.” Maimonides premise is that Samuel’s statement refers to the speaking voice of a woman, as codified in his Laws of Sexual Prohibitions (see below) where he emphasizes that it is the focus on sexual pleasure that creates the prohibition. In a licentious environment of wine and song (and gentile women!), the concern for impropriety is clear.

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| *Maimonides Issurei Biah (Laws of Sexual Prohibitions) 21:2*… And it is forbidden for a person to signal with his hands or feet or to wink with his eyes at one of the women sexually prohibited to him, or to laugh with her or act frivolously, and even to smell the perfume that is upon her or to look at her beauty - is forbidden. And we strike one who intends to do these things with [rabbinic] lashes of rebellion. And one who looks even at the little finger of a woman and intends to derive benefit, is as if he gazes at her private parts. And even to hear the voice of an *ervah* or to see her hair is forbidden. | משנה תורה, הל' איסורי ביאה פרק כאב  ואסור לאדם לקרוץ בידיו וברגליו או לרמוז בעיניו, לאחת מן העריות; וכן לשחק עימה, או להקל ראש.  ואפילו להריח בשמים שעליה, או להביט ביופייה--אסור; ומכין המתכוון לדבר זה, מכת מרדות. והמסתכל אפילו באצבע קטנה של אישה, ונתכוון ליהנות--כמי שנסתכל במקום התורף; ואפילו לשמוע קול הערווה, או לראות שיערה--אסור. |

In this passage in his Mishneh Torah, Maimonides lists a series of behaviors that must be avoided by men when it comes to women sexually prohibited to them, which includes virtually all women aside from their wives when they are not menstruants. Direct physical contact leading to sexual pleasure (short of sexual relations) is prohibited from the Torah. Indirect contact specifically with the intent to derive sexual benefit, including looking at any part of the woman’s body, hearing the voice of an *ervah* or seeing her hair are rabbinically prohibited. There is no distinction made between the singing and speaking voice of the woman. It is the intent to derive pleasure, even if the content and context of the interaction are innocent, that determines the prohibitive nature of the voice.

To summarize, many of the approaches expressed in the post-Talmudic era establish that not all women’s voices are prohibited and that there is no specific prohibition for a woman’s voice to be heard. They distinguish between different voices – voices associated with or leading to sexual pleasure or intimacy on one hand, and voices that do not invite sexual thoughts on the other. It is possible to conclude from this thread of interpretation that singing that includes sexual lyrics or sexualized movements would be prohibited, while the singing of liturgy, lullabies or simple folk songs could be permitted. Habituation emerges as a fundamental distinction in defining whether certain things like voice or hair are objectively *ervah* or not. Even in the seemingly more restrictive approach which supports Samuel’s statement that the voice of a woman is *ervah*, content and context of the “uncovered” voice matter. Maimonides specifies intent to derive sexual pleasure as determinative of transgression when listening to a woman’s voice.

While strong concern is expressed for subjective factors regarding female-male interactions that can turn an innocent interaction into one charged with sexual possibility, there does not seem to be a prohibition for women to sing in front of men once it is established that women and men can interact in an appropriate and non-sexual way. The familiarity/habituation principle seen in the writings of major halakhic authorities from the early Middle Ages onward could certainly be applied to permit women’s speaking and singing voices in the company of men.

This conclusion was also expressed by the late Rabbi Yehuda Herzl Henkin, a significant contemporary halakhic authority:

 “We have seen, then, that there exists a trend – not a dominant trend, but a trend – within halakhic thought that in interactions between the sexes that might ordinarily lead to *hirhur* (sexual thoughts), frequency and familiarity of contact can be a mitigating factor, and that a community can legitimately rely on this in using the services of and speaking to and looking at women.”[[14]](#footnote-16)

However, Rabbi Henkin, recognizing that the habituation/familiarity principle could be taken to an extreme in the modern secular world in which the boundaries around speech, dress and comportment are minimal, added an important caveat:

“No degree of frequency and familiarity can legitimize what is intrinsically or intentionally sexually stimulating. Examples are immodest or provocative dress, erotic performances and entertainment and other pitfalls too numerous to be listed. A sin indulged in a thousand times remains a sin.”[[15]](#footnote-17)

This last point is a fitting response to those who might apply the halakhic concepts of familiarity and habituation to remove most boundaries in a world in which a normative dress code is almost non-existent, ubiquitous sexualization of lyrics and language are prevalent in daily conversation, and, certainly on many music platforms, “nakedness” is virtually uncovered everywhere. Nothing is further from the halakhic truth. Certain behaviors, including types of dress and language, remain fundamentally sexualized regardless of familiarity and can never be permitted. The question remains, does this objective sexualization include a woman’s singing voice, as applied by the majority of Orthodox communities worldwide today.

If the laws of *kol isha* would rest largely on the concepts of familiarity, habituation and intent, there would be little concern in terms of practical halakhah today. However, the premise that a woman’s voice, even when speaking, has the requisite potential to trigger male sexual response or foster promiscuity, remains present in the halakhic literature. While a woman’s voice will not be *ervah* all of the time, first and foremost, extreme caution must be taken when evaluating any situation in which a man will be exposed to this potential source of *ervah*.

# From the Shulchan Arukh Until Today

We will begin the final section of this chapter with a discussion of the Shulhan Arukh’s treatment of these questionsgiven its centrality in all contemporary halakhic analysis. In Even HaEzer, the section of the Shulhan Arukh that deals with matters of women and halakhah, Rav Yosef Karo lays out his concerns about interactions between the sexes. His rulings sound very much like those of Maimonides that we have seen above.

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| Shulhan Arukh Even HaEzer 21:1A person must stay very far from women. He is forbidden to signal with his hands or his feet, or to hint with his eyes, to one of the sexually prohibited relationships. He is forbidden to be playful with her, to be frivolous in front of her, or to look upon her beauty. Even to smell the perfume upon her is forbidden. He is forbidden to gaze at women doing laundry. He is forbidden to gaze at the colorful garments of a woman whom he recognizes, even if she is not wearing them, lest he come to have [forbidden] thoughts about her. If one encounters a woman in the marketplace, he is forbidden to walk behind her, but rather [must] run so that she is beside or behind him. One may not pass by the door of a promiscuous woman [or: a prostitute], even four cubits [around 6–8 ft or 2–2.5 m] distant. If one gazes even at the little finger of a woman with the intent to have pleasure from it, it is as though he gazed at her shameful place. It is forbidden to listen to the voice of an *erva* or to look at her hair. If one intentionally does one of these things, we give him lashes of rebellion. These things are also forbidden in the case of ordinary Biblical prohibitions. | שלחן ערוך אבן העזר סי' כאא צריך אדם להתרחק מהנשים מאד מאד ואסור לקרוץ בידיו או ברגליו ולרמוז בעיניו לאחד מהעריות. ואסור לשחוק עמה להקל ראשו כנגדה או להביט ביופיה ואפילו להריח בבשמים שעליה אסורץ ואסור להסתכל בנשים שעומדות על הכביסה ואסור להסתכל בבגדי צבעונים של אשה שהוא מכירה אפי' אינם עליה שמא יבא להרהר בה.פגע אשה בשוק אסור להלך אחריה אלא רץ ומסלקה לצדדין או לאחריו. ולא יעבור בפתח אשה זונה אפילו ברחוק ד' אמות.והמסתכל אפילו באצבע קטנה של אשה ונתכוין ליהנות ממנה כאלו נסתכל בבית התורף שלה. ואסור לשמוע קול ערוה או לראות שערה. והמתכוין לאחד מאלו הדברים מכין אותו מכת מרדות ואלו הדברים אסורים גם בחייבי לאוין: |

In general, the Shulhan Arukh advocates strict gender separation in order to prevent men from having sexual thoughts. However, he does not focus on the singing voice as being uniquely erotic. Furthermore, in the laws of Shema, he makes a curious distinction.

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| Shulhan Arukh, Orah Hayyim 75:4One should be careful [to refrain] from hearing a woman's singing voice at the time of the recitation of the Shema. Gloss: And even of his wife. But a voice that one is familiar with is not [considered] nakedness.  | שלחן ערוך אורח חיים סי' עהד יש ליזהר משמיעת קול זמר אשה בשעת קריאת שמע. הגה: ואפילו באשתו. אבל קול הרגיל בו אינו ערוה.  |

There are a few things to note in the text cited above. While reciting the Shema, “One should be careful [to refrain] from hearing a woman's singing voice…even of his wife.” Rabbi Karo gives warning, but does not prohibit hearing a woman’s singing voice. This language suggests that a woman’s speaking voice is not an issue even during Shema, and that the singing voice is not fundamentally erotic. In his gloss to Shulhan Arukh, Rabbi Moshe Isserles clarifies that point by adding that “a voice that one is familiar with is not [considered] nakedness.” When integrating the texts brought above from Even HaEzer together with the laws of recitation of the Shema, it is possible to conclude that intent to derive sexual pleasure from hearing the voice of a woman is prohibited, but that the singing voice of a woman is not inherently prohibited, even during Shema, if there is no sexual intent and there is familiarity.

## Modernity and Kol Isha

The shift towards defining *kol isha* as a prohibition relating specifically to a woman’s singing voice is well reflected in the 17th century commentary of Rabbi Abraham Gombiner, known as Magen Avraham, on the Shulhan Arukh and later in the early 20th century commentary of the Mishnah Berurah written by Rabbi Israel Meir Kagan. It appears that at about this time, a blanket prohibition on women singing emerges across the observant world.

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| Magen Abraham Laws of Shema 75:36. Singing voice of a woman. Even a single woman. And see the laws of Even HaEzer [in Shulhan Arukh] *siman* 21 that the singing voice of a married woman is always prohibited but her speaking voice is permitted. | מגן אברהם על שולחן ערוך אורח חיים הל' קריאת שמע סי' עה סעיף גו זמר אשה. אפילו פנויה. וע' בא"ע סימן כ"א דקול זמר אשת איש לעולם אסור לשמוע אבל קול דבורה שרי: |

As noted above, the Shulhan Arukh does not single out the singing voice of a prohibited woman in Even HaEzer. Moreover, nowhere does he prohibit a woman from singing beyond the obvious restrictions of inappropriate content, context, and intent to derive sexual pleasure. According to the Magen Avraham, a married woman’s singing voice is always prohibited, while all women who sing – even those who are permitted, like a man’s wife or single women – who are not fundamentally prohibited – are restricted from singing while a man is reciting the Shema. This addendum, which assumes a fundamental prohibition of a married woman’s singing voice but not her speaking voice, seems to be an innovation that has no precedent and does not reflect the language of the Shulhan Arukh, even as the ruling is attributed to it.

In the late 19th century, Rabbi Israel Meir Kagan, author of the Mishnah Berurah, a commentary on the Shulhan Arukh took the idea of prohibiting women’s singing one step further.

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| Mishnah Berurah Laws of Shema 75:317. “Singing of a woman.” Even a single woman. However, if it is not during Shema, hearing the singing voice of a single woman is permitted but he must not have intent to derive pleasure from it so that he not come to have sexual thoughts. The singing voice of a married woman and of all other sexually prohibited relationships are always prohibited and the single woman who is a niddah (menstruant) is also in the category of a sexual prohibited woman. And our single women (literally virgins) are all presumed niddot from the time of their first menstrual cycle.18. “That he is familiar with.” What Shulhan Arukh means to say is that since it is a voice he is accustomed to, he will not be aroused to sexual thoughts. [The Mishnah Berurah understands this to mean a woman’s speaking voice. He has already issued a blanket prohibition on the singing voice of all women from puberty onward.] And even that of a married woman. But even so, it is prohibited to have intent to derive pleasure from her speaking for it is prohibited even to look at her clothing in order to derive pleasure. | משנה ברורה הלכות קריאת שמע סי' עה סעיף ג(יז) זמר אשה - אפילו פנויה. אבל שלא בשעת קריאת שמע שרי, אך שלא יכוין להנות מזה כדי שלא יבוא לידי הרהור. וזמר אשת איש וכן כל העריות לעולם אסור לשמוע, וכן פנויה שהיא נדה מכלל עריות היא. ובתולות דידן כולם בחזקת נדות הן משיגיע להן זמן וסת. וקול זמר פנויה נכרית היא גם כן בכלל ערוה ואסור לשמוע בין כהן ובין ישראל. (יח) הרגיל בו - רצונו לומר, כיון שרגיל בו לא יבוא לידי הרהור ואפילו מאשת איש. ואפילו הכי אסור לכוין להנות מדיבורה שהרי אפילו בבגדיה אסור להסתכל להנות: |

In the Mishnah Berurah’s commentary, we see a final immutable turn away from the plain understanding of the Shulhan Arukh that allowed for moderation and nuance depending on context, circumstance and intent when ruling on a woman’s singing voice. Building on the Magen Avraham’s blanket prohibition for married women to sing under any circumstance, the Mishnah Berurah initially concludes that an unmarried woman could, potentially, be permitted to sing in contexts outside of a man reciting the Shema. Rabbi Kagan then rejects this, concluding that all unmarried women are presumably niddah and thus, are sexually prohibited, even though they are not married. Finally, he states unequivocally that the only voice that could fall into the category of familiar is the speaking voice, provided that a man does not intentionally derive pleasure from such verbal interaction. This ruling leads many Orthodox communities to restrict girls from singing in any public or communal setting beyond the age of 11, and sometimes even 9, when a girl could potentially begin to menstruate.

To clarify, the majority of rabbinic authorities in the last few centuries have ruled in keeping with the Magen Avraham and the Mishnah Berurah so that the earlier position outlined in the Shulhan Arukh has been virtually erased. The greater focus of the statement *kol b’isha* *ervah* is now strictly about singing, and the process outlined earlier – that the prohibition includes speaking and/or singing if the content or context is sexualized and/or unfamiliar – almost completely disappears. Even during Shema, the speaking voice of women is now permitted because of the familiarity argument, while the singing voice becomes prohibited in all settings. Familiarity, habituation and intent (as well as context and circumstance) are rendered irrelevant in the face of the now objective sexualization of women’s singing voices in halakhah.

Nonetheless, there are isolated rabbinic voices that reject this final determination, three of which will be examined below. The question of the scope of the prohibition and possible permissibility of listening to women sing without intent to derive pleasure is discussed in the *Sedei Hemed* by Rabbi Haim Hezekiah Medini, the 19th century rabbinic scholar from Jerusalem. He affirms that most rabbinic authorities of his time indeed prohibited women from singing. However, he cites Rabbi Aharon de Toledo, the author of *Divrei Hefetz* (published in Salonika in 1798) who permitted it “so long as it is not a voice of lust-provoked songs and the listener does not intend to derive pleasure from her voice.” The concern of the *Divrei Hefetz* was about music that might contain illicit content and thus, singing that could lead to inappropriate sexualized thoughts and/or behavior, but not about the fundamental sexualization of a woman’s singing voice.

Note that by the 19th century, Rabbi Toledo, who most accurately reflects the halakhic discourse presented in the Talmud and post-Talmudic sources outlined above, has become a minority opinion. Nonetheless, Rabbi Medini acknowledged that his position is a legitimate one.[[16]](#footnote-18) Most contemporary responsa that prohibit women singing under any and all circumstances reject or ignore the analysis brought in the *Divrei Hefetz* but they do so without any prooftext to undermine his thesis. Given that it is dated post-Shulhan Arukh and has lasting halakhic integrity because of its roots in earlier rabbinic texts dating back to the Talmud, this ruling should remain relevant for rabbinic authorities seeking a lenient opinion on the matter.

Around the same time that Rabbi Medini was writing his responsum in Jerusalem, Rabbi Azriel Hildesheimer and Rabbi Samson Raphael Hirsch, two leading rabbinic authorities from the more modern Jewish communities in Germany, permitted men and women to sing Shabbat songs (zemirot) together in a family setting. They avoided the outright rejection of the prevalent ruling which prohibited all women’s singing, they based their leniency on an unprecedented but innovative argument. They used the Talmudic assertion that תרי קלי לא משתמעי “two voices cannot be heard simultaneously.” To clarify, the idea of two voices appears in tractate Rosh HaShanah to explain why two people cannot read Torah simultaneously because there is no way to distinguish who is reading.[[17]](#footnote-19) Rabbis Hildesheimer and Hirsch innovatively suggest that if women sing with men or at least two women sing together, it nullifies the concern for sexual promiscuity since there is no way from the halakhic perspective to clearly distinguish whose voice is being heard.

This approach should have been unnecessary, since, as explained above, based on the majority understanding in both Talmudic and post-Talmudic discourse, singing songs or *zemirot* on Shabbat does not violate the mandate of *kol isha*. Sung around a table in a home and focused on the sanctity of Shabbat, such songs involve neither promiscuous behavior nor obscene lyrics. While the “two voices” construct did not become the mainstream Orthodox approach, some observant communities rely on it to permit women to sing at the Shabbat table, in a mixed choir with men, or even to allow a group of women to perform together in a modest setting with appropriate lyrics.

The final rabbinic authority who played a significant role in reintroducing a moderate approach to women singing was Rabbi Yechiel Yaakov Weinberg, known as the *Seridei Aish*. Rabbi Weinberg wrote a famous responsum in which he permitted boys and girls to sing together during youth group activities in France after World War II. He advocated adopting this permissive approach in deference to the needs of the generation.

Seridei Eish, Vol. 1 no. 121, p. 394

However, in our case, since there is no absolute prohibition, but rather a righteous custom and practice of modesty, it is possible to marshal support and to permit the practice in France. For the situation of Jewry has arrived at a point of crisis and if we do not grasp educational methodologies which are tested and crowned with success… the Torah will, God forbid be forgotten among Jews…. In countries like Germany and France, women would feel disgraced and see it as a deprivation of their rights if we prohibited them from joining in the rejoicing over the Sabbath by singing *zemirot*. This is obvious to anyone familiar with the character of women in these countries. The prohibition could drive women away from religion God forbid.

Noting that the prohibition regarding women singing is based on custom and practices of modesty, Rabbi Weinberg suggests a return to the earlier halakhic approaches that we have seen, in which context and familiarity can guide the halakhic discourse rather than the immutable fear of that all mixed gender interaction is inherently sexual. More importantly, he recognizes the possible alienation felt by women who will take umbrage at the suggestion that their voices are so sexualized as to require them to be silenced.

Rabbi Saul Berman, a modern Orthodox halakhic thinker, in a comprehensive analysis of the halakhic sources about women singing, summarizes this approach:

For the Acharonim [later rabbinic authorities]... “the voice of a woman is nakedness” is a declaration that a woman's singing voice, under all circumstances, is to be considered a form of nudity. In light of this proposition, it is understandable that the later rabbinic authorities virtually totally discard the limiting principle of accustomedness which the Rishonim [early rabbinic authorities] used so extensively. …The importance of this position [of Rabbi Weinberg] lies in the fact that it constitutes a major departure from the treatment of a woman's singing voice as a form of [absolute inherent] nudity. It reinstates the tradition of the Rishonim [early rabbinic authorities], that the ban on a woman's voice is functionally motivated and is related to the likelihood of its resulting in illicit sexual activity.

In recent years, Rabbi Moshe Lichtenstein of Yeshivat Har Etzion and Rabbi David Bigman of Yeshivat Ma’ale Gilboa have written responsa that permit women to sing – even alone – in religious or national settings. Reflecting the halakhic positions of the Talmud and post-Talmud interpreters, Rabbi Bigman writes that women could be permitted to sing if the context and atmosphere of the gathering are appropriate and the lyrics of the song, dress of the singer, body language and musical style are not provocative:

In an article published in two mainstream Orthodox journals of halakhah, Rabbi Moshe Lichtenstein, after an extensive analysis of the topic, concurs with Rabbi Weinberg’s position, recognizing that the needs of the generation are great and for many Orthodox men, women’s singing voices are familiar and cause no possible sexual thoughts or distraction. Furthermore, he writes that he does not need to upend the halakhic structure, as he can rely comfortably on the earlier halakhic discourse from the Talmud onward.

According to this approach, there is no problem with those among our daughters who are modest and upstanding to develop a career in singing, even within the general culture, as long as they do not make concessions of the refined foundations of Torah culture, and do not cooperate with the vulgar, commercialized aspects of the culture surrounding us.

Nonetheless, despite the clear interpretive process that could allow for leniency, the majority of halakhic opinions are extremely reluctant to follow the Lichtenstein/Bigman approach. For instance, in his essay “The Parameters of *Kol Isha*,” Rabbi Chaim Jachter, a contemporary halakhic authority, opens by stating unequivocally that “the Gemara (Berachot 24a) records the prohibition of *kol isha*” as a starting point for an analysis that limits and rejects possible moderation.[[18]](#footnote-21) Based on our analysis, it is difficult to see how Rabbi Jachter extrapolates a clear prohibition from such an ambiguous Talmudic statement. What is clear is that the Talmudic text has become secondary to the layers of interpretation – particularly those of the last four hundred years – built on top of it. Much of mainstream Orthodoxy has favored a non-negotiable and very stringent perspective about women singing in front of men. This perspective has been invoked beyond actual singing to prevent women from saying kaddish, (citation is Rabbi Ovadia), as if even hearing a woman’s voice in synagogue violates a sacred taboo that will distract men who are meant to be focused on matters of sanctity.

In essence, *kol isha* has become a sort of battleground in which religious communities are tested regarding their fidelity to perceived halakhic observance. It is another situation in which halakhic rulings that go well beyond the original source material dominate the religious playing field. This not only affects the discourse regarding women singing, but also has implications for women reciting kaddish in synagogue and even for restricting women from giving lectures or Torah classes to men.

It is my hope that this chapter has helped explain the interpretive process that has unfolded over the course of the last several hundred years, leading towards an unyielding and halakhically disproportionate attitude of stringency. This restrictive “innovation” prohibiting women from singing or being heard at all in the synagogue has been adopted by many as the only legitimate halakhic approach to *kol isha*, but it does not need to serve as the final note. The source analysis presented here is meant to give shape to the possibility of reclaiming the “traditional” approach, dating back to the Talmud, one that actually permits women to raise their voices in joyful song and prayer without fear of sexualizing society.

1. https://www.aish.com/atr/Kol\_Isha.html [↑](#footnote-ref-1)
2. See Chapters 1 and 2 for a detailed analysis of the Talmudic text. [↑](#footnote-ref-4)
3. This is the position taken by Rabbi Hisda in Ketubot 75a, who explains that based on this verse an abnormally deep voice in a woman is considered a defect serious enough to allow for the annulment of a marriage if a man married a woman on the condition that she was without defects. [↑](#footnote-ref-5)
4. While writing this chapter, I came across an article by Dr. Aharon Amit, who supported my reading of the Jerusalem Talmud and reinforced my intuition that the verse from Jeremiah was probably the original *asmachta* or textual link to the statement, rather than the verse from Song of Songs. [↑](#footnote-ref-6)
5. There is a similar statement in Mishnah Avot (1:5): “One should not talk excessively to women for you may ultimately come to illicit intercourse.” The Mishnah in Avot warns that interaction between the sexes can lead to illicit sexuality and one should limit but not eliminate conversation with women. It neither prohibits such interaction nor singles out the woman’s voice as specifically problematic. The passage in Kiddushin is more extreme, forbidding not just casual conversation but even words of greeting. [↑](#footnote-ref-7)
6. Dr. Aharon Amit suggests that Samuel’s statement which is native to the unit in Berakhot is brought into Kiddushin by later redactors since some of the manuscripts and early print editions are missing the text of “Samuel said the voice of a woman is *ervah.*” In other words, since Samuel is being quoted on the topic of sending greetings to a woman, particularly a married woman, later editors imported his statement from Berakhot about a woman’s voice being *ervah*. Since later commentaries use Samuel’s statement to restrict women singing, its appearance in both Kiddushin and Berakhot gives greater weight to the statement. To Amit, this explains the absence of Samuel’s statement with all of its implications in the vast majority of post-Talmudic commentary when commenting on Kiddushin. The halakhic implications that emerge from Kiddushin would essentially force us to understand Samuel’s statement as including the speaking voice of the woman, which matches the text in the Jerusalem Talmud. This, however, is not the conclusion of halakhic authorities. [↑](#footnote-ref-8)
7. Rashi in his commentary explains that boat haulers and plowers need song in order to inspire them to do their physically strenuous work, while weavers sing purely for enjoyment. [↑](#footnote-ref-9)
8. See Cohen, Boaz, *Law and Tradition in Judaism*, pp. 167-181. [↑](#footnote-ref-10)
9. The 11th century Talmudist and halakhic authority Rabbi Isaac Alfasi, known as the Rif, ignores the entire *ervah* unit in Berakhot (as well as the section in Kiddushin quoted in the name of Samuel). This suggests that he viewed the statements as rhetorical rather than halakhic since he only incorporated applied halakhic statements into his commentary. [↑](#footnote-ref-11)
10. Otzar HaGe’onim, Berakhot, Peirushim, pp. 30, section 102. [↑](#footnote-ref-12)
11. Otzar HaGe’onim, Berakhot, Commentary of Rabbeinu Hananel, p. 25, sec. 84. [↑](#footnote-ref-13)
12. Ra’avyah, Ra’avad, Rashba and Ritva. [↑](#footnote-ref-14)
13. See Otzar HaGe’onim, Sotah, pp. 272-272, sec. 143. Mixed entertainment is condemned in this source as promiscuous, and the Ge’onim argue that both the men and the women should be excommunicated for partaking in such entertainment. A few lines later, the Ga’on also condemns men who play instruments even in settings where there are only men, and he also commends those who avoid playing drums during the bridal ceremony. In Otzar HaGe’onim Sukkah pp. 69-70, section 189, the Ga’on condemns men and women sitting together at festive meals outside of family, extended to include aunts and sisters. In Otzar HaGe’onim Gittin pp. 8-9 sec. 18, the Ga’on is asked about a custom in the house of bride and groom for women to play drums and tambourines and bring gentiles who gladden with harp and string instruments. He answers that song, blessings and music are permitted and encouraged in the home of the bride and groom. He then condemns a type of love song sung at these gatherings under the influence of the Ishmaelites. He explains that after the Sanhedrin was disbanded, the songs of the Ishmaelites were prohibited but not the songs of Israel, with the exception for certain work songs which did not have ugly lyrics. Finally, he reiterates the teaching in Sotah, that men and women singing one to the other is prohibited particularly at festive occasions because of the possible licentiousness. [↑](#footnote-ref-15)
14. Henkin, Yehuda Herzl, *Equality Lost*, p. 81. [↑](#footnote-ref-16)
15. Ibid, p. 82. [↑](#footnote-ref-17)
16. “One who sees *Divrei Hefetz’s* words will rightfully deem them cogent. And even though it is surely correct to act stringently, not in accordance with the aforementioned words of the *Divrei Hefetz*, in any case they are not, Heaven forbid classified as inscrutable words.” *Sedei Hemed*, section 20, principle 42 (vol. 5, p. 282) [↑](#footnote-ref-18)
17. Rosh HaShanah 27a. [↑](#footnote-ref-19)
18. <https://www.koltorah.org/halachah/the-parameters-of-kol-isha-by-rabbi-chaim-jachter> [↑](#footnote-ref-21)