Chapter 2

Federalism and Constituent Diplomacy: A Theoretical Overview
Federalism, as a form of government, ensures a clear demarcation of power between the union government and the constituent units. The Constitutions of various federations clearly state the dominant role the union government has in relation to foreign policy. In the recent decades the nature of federal system of government has undergone changes due to various socio-economic and political factors. The forces of economic liberalization combined with transformations in the political party systems have contributed to increasing federalization tendencies in various countries. This growing pace of federalization demands modifications in the patterns of federal-provincial or union-state relations in these countries. Foreign policy decisions have been traditionally considered as an exclusive domain of the national government. However, in recent times, the exclusive grip of the union government in foreign policy decisions is slowly being weakened by the activities of the members or units in federal unions.

The increased role of states in foreign policy decisions has led to the discussions regarding the role that states should play in foreign policy decisions. There are opinions that states should have a larger role in foreign policy decisions so that the country’s foreign policy reflects the domestic diversity and reality. Federalism is usually associated with societies with social diversity and thus it is considered as a mechanism to represent external unity amidst of all the internal diversity. But this principle does not really reflect the reality of foreign policy decisions in federal structures anymore. International transformation has influenced the relations between union and the states in federal systems and this in turn has affected the principle of the union government being the sole actor in international activities. Before entering into a detailed analysis of this aspect, the concept of federalism is briefly discussed below.

**Federalism**

The term federal is derived from the Latin word foedus which means covenant. Thus a federal arrangement is established and regulated by a covenant and signifies partnership
between the parties involved. Federal principles are concerned with the combination of self rule and shared rule. It is also based upon mutual recognition, tolerance, respect, obligation and responsibility. The federal idea has its roots in the biblical usage of the term which was used to define the covenantal relationship between man and god. A biblical perspective of federalism corresponds to the concept of covenantal federalism which embodies a set of normative principles that bind partners together in a moral contract or agreement of trust. When the theological term was used to signify political ideas, the political concept of federalism was born.

Federal system works in a way that all can have a say in the process of decision making and policy implementations. In the modern world, federalism has emerged as a means to preserve internal diversities and at the same time enable greater security and economic advantage for the country concerned.

Today, nineteen of the world’s independent states are federal by constitution and they contain some forty percent of the world population. By character federal polities are non-centralized in which the powers of the government are diffused among many centres. Federalism is concerned with the diffusion and concentration of political power at the same time. The diffusion of political power is done in the name of liberty and its concentration is done with the intention of preserving unity simultaneously. The federal idea rests on the principle that political and social institutions and relationships are best established through covenants or other contractual agreements rather than simply growing organically.

Definitions

In its simplest sense, federalism is a form of government in which there will be at least two orders of government whose existence is engrained in the constitution of the country. Federalism is multidimensional in character. It has constitutional, legal, political, economic, social, ideological, territorial, and cultural aspects. It is difficult to arrive at a universal definition on federalism since different scholars have been concentrating on different parts and dimensions of the same concept.

According to Duchacek, a federal system means a constitutional division of powers between one general government which has authority over the entire national territory and a series of subnational governments that have independent authority over their own territories. K C Wheare defines federalism as a system where, “the functions of government are divided in such a way that the relationship between the legislature which has authority over the whole
territory and those legislatures which have authority over parts of the territory is not the relationship of superior to subordinates but it is the relationship of co-ordinate partners in governmental process.\(^5\)

Albertini considers federalism as a form of political thinking and behaviour with both a “social basis” and an “historical reference”. The sense of community and cosmopolitanism includes the social basis of a federal polity. Stages of evolution of economic and political interdependence provide the basis of historical reference. The European federation stands as an example for the fact that formation of federalism requires overcoming national sovereignty itself.

According to William Riker, a Constitution is federal if it fulfils the following three criteria.

1. Two levels of government rule the same land and people
2. Each level has at least one area of action in which it is autonomous.
3. There is some guarantee in the Constitution of the autonomy of each government in its own sphere.\(^6\)

Renowned federalism scholar, Riker analyses federalism from a constitutional and legal viewpoint. Livingston, another expert gives emphasis on the sociological basis of federalism. He believes that the basis of federalism lies in the society itself and not in the institutional or constitutional structure. Federations owe their existence to a variety of social cleavages like linguistic diversities, territorial identities, religious differences and sub-state nationalism. The territorial distribution of these social cleavages is crucial to the stability and political order in a federal system.\(^7\)

The crucial factor which distinguishes a federal system from a unitary system is the fact that the delegation of power to the subnational governments from the union government is constitutional and cannot be retrieved. Though in a unitary system of government the power delegated from the union government to the subnational governments may be retrieved, they do not enjoy a constitutional status. In a unitary system of government, even though the sovereignty is vested in the union government, it does not have infinite decision making power. The power enjoyed by constituent units in a federal system of government is inherent rather than delegated.
Federalism and Constituent diplomacy

The twin forces of globalization and regionalization are the key influencing factors in the political, economic and cultural aspects of the development of modern nation states. The traditional authority and sovereignty of states are slowly being weakened by the influence of these forces. The notion that national governments are the only players in the international affairs has been disproved by the emergence of various non-state actors like Multinational corporations, transnational NGO’s and Supranational regimes like the EU or NAFTA. 8 Of all these new actors in international arena, sub national entities are the only players who have a state like nature being part of a state institutional design. Because of the drifting changes, the regional governments or constituent units in national governments are increasingly involving in international activities which are traditionally not their area of influence. The regional governments perform actively in international affairs in different ways: they open trade and cultural missions abroad, sign treaties and agreements with foreign state and non-state actors, they participate in international networks of regional cooperation and they sometimes even challenge the official foreign policy of their central governments through their statements or actions. 9

The involvement of constituent units of national states in international affairs is generally referred to as paradiplomacy or constituent diplomacy or subnational diplomacy. Normally the non central governments have hardly any role in international issues comprising war, arms talk, and international terror. 10 But with the changed national and international circumstances state or regional actors are venturing to the territories forbidden to them. These internal concerns with external dimensions are equally important because they usually represent opinions within a state from its base level and thus play an important role in the formulation of an inclusive foreign policy.

Academic research regarding the increasing role of constituent units in international affairs surfaced in the 1970s in the form of case studies that enquired into the external activities of constituent units of federal countries such as Canada and USA. The early theoretical works on constituent diplomacy were based on the activities of constituent units in a federal setup. Therefore, the subnational government activities were viewed through the prism of transformations taking place within a federal system of government. Rather than studying constituent diplomacy as a new phenomenon, the studies in the 70s and 80s considered it as a byproduct of federalism studies.
Federalism, being a complex phenomenon, has been studied widely by political scientists. As Duchacek states, there is no accepted theory of federalism and it has become one of those vague terms which signifies ideas like democracy, socialism, progress, constitution, justice or peace. It is applied to any successful combination of unity and diversity and any form of pluralism and cooperation within and among nations.\textsuperscript{11}

Another matter of importance is the origin of autonomy in a federal country, whether it is from the constitutional norms or as William Livingstone proposes, “the essence of federalism lies not in the constitutional or institutional arrangements but in the society itself.”\textsuperscript{12} The autonomy for the subnational governments might be derived from the factors such as geographical, ethnic, cultural or any other peculiarities in a particular society. For instance the origin of federal values in Spain is not from the constitution but from the federal tenets that exists in the Spanish polity.\textsuperscript{13}

In an attempt to explain federalism from a new dimension, Duchacek came up with the proposition that federal polity is only a state where a combination of pluralistic democracy exists with two sets of government. Thus the countries with dictatorial governments or non free political regimes were excluded from the list of federations. They were considered as pseudo federations because according to Duchacek, by nature these countries were oriented only at keeping their monolithic power.\textsuperscript{14}

Thus democracy was considered as a precondition for federalism. But there is some vulnerability in equating federalism with democracy. The self proclaimed federations with democratic system of government might not be real federations in substance. Thus there could be a great deal of difference between de facto federations and de jure federations. In order to understand the involvement of subnational governments in international relations from a federal dimension, there should be some clarity regarding certain issues. They include the issue of sovereignty in a federal structure, the division of power between the two levels of authorities and the imbalance in the division of competence between federal and subnational authorities.

**The question of sovereignty**

The question of sovereignty is one of the important issues when it comes to the analysis of a federal system of government. It was studied in the nineteenth century by renowned political scientists such as James Bryce and Albert Dicy. Later in the twentieth century the
discussion was continued by Daniel Elazar, Carl Friedrich and other political scientists and lawyers.

These studies have led to the conclusion that sovereignty in its traditional sense has ceased to exist in a federal polity. In a federal system of government political units coexist and interact as autonomous bodies. As Friedrich states, no sovereign can exist in a federal system; autonomy and sovereignty exclude each other in such a political order.\textsuperscript{15} According to the theory of national sovereignty, the sovereign instrument of government stands at the centre of the system and all other instruments of government are essentially peripheral. But the political arenas established by the federal theory, negates the existence of a centre.\textsuperscript{16}

The process of the involvement of federated units, the pioneers being Canadian provinces and American states, in foreign affairs detected by scholars in the 1970s provided an impetus to the discussions on sovereignty and federalism. The increased involvement of regional governments in international affairs was interpreted by federalism scholars as a strong evidence of the decline of national sovereignty. John Kincaid concluded that federalism is a system where an element of dual sovereignty exists.\textsuperscript{17}

Duchacek points out that constituent diplomacy does not totally eliminate the sovereignty of modern states, but perforates it.\textsuperscript{18} The perforation of sovereignty in federal polities was mainly caused by the problem of distribution of powers between the federal and subnational authorities. Riker’s vision cited above, strongly convinces us that the territorial division of power competences and the presence of at least one exclusive area for each level of government jurisdiction are essential preconditions for federalism.

**Constituent diplomacy within a federal structure**

Traditionally, the division of competences between the union government and constituent units was based on the idea of difference between the so called high politics and low politics. High core politics are those matters on the national and international level that are important for the sustainability of the whole state like national security, foreign affairs and military questions. On the other hand, low politics are those matters that through the principle of subsidiarity are in exclusive or in shared competence of regional authorities, like education, ecology, health care, etc. The monopoly of the union government in the sphere of international relations was accepted by theorists as one of the most essential features of federalism.\textsuperscript{19} In most of the federations, foreign relations are controlled by the federal
government and it is considered that no federation can properly function without adequate power to control the basic aspect of foreign relations.\textsuperscript{20}

Duchacek in his book “The territorial dimensions of politics” considers federal government’s exclusive control over the foreign relations as one of the basic features of federalism.\textsuperscript{21} When it comes to foreign policy, a federal union’s main intention is to present itself as possessing the power and will to speak on behalf of its component units with one legitimate voice in the international scene. So the federal government has the ultimate control over the issues of foreign policy.

Foreign policy which was considered as a subject of high politics was considered as a field of exclusive dominance of sovereign states but not the constituent units. A major change in this scenario began in the 1960s and 1970s with the growth in power of the new players in global affairs including the regional players manifested strongly than ever before. International relations theorists responded to these changes by developing the theories of transnational revolution and updating the theory of liberalism to neoliberalism to explain the emerging tendencies. The study of constituent diplomacy from a federal perspective mainly focuses on the impact of constituent diplomacy on a federal structure and how it contributes to the transformation of intergovernmental relations in a federal system.

In a globalised world with fading boundaries the clear distinction between high and low politics has become vague and the subnational units have been trying to reap the benefits from an interdependent world. The study of constituent diplomacy has resulted in the revision of the federalist theory of distribution of powers between different levels of government. The constituent diplomacy can be considered as an extended expression of the constituent government’s domestic policy. Due to the forces of globalization, many internal issues are internationalized and many international issues internalized. Their actions are a continuation of the subnational domestic politics (policy) outside regional and national borders. The exclusive right of the federal government to be the sole representative of a federal country in international affairs is slowly depleting and this has led to development of theories on the segmentation of foreign relations in federal countries.

The foreign policy matters are extremely diversified and can be divided into high, medium and low core layers. The regional international activities concerned with education, tourism, culture and other areas of subnational importance can be categorized under low core international relations. The concurrent jurisdiction covers trade and commerce agreements
with foreign states immigration policies. Declaration of wars, nuclear issues, maintaining and controlling armed forces etc. fall under the domain of high core powers of the federal government.

Sometimes the low, medium and high core elements can overlap and bring a tug of war between the union and regional authorities. Constituent diplomacy usually covers the medium and low core issues but in some instances they might overlap with high politics issues. For example, the American states in the 1980s decided to ban the production and placement of nuclear weapons on their territories. An issue of high politics, national security contradicted the regional governments ecological and health issues which forced them to intervene.\textsuperscript{22}

One of the major dilemmas faced by a federation is to find a balance between sovereignty and the distribution of power between the federal and subnational units. Too much of subnational activity might adversely affect the sovereignty of the federation which might result in the breakup of a federation or the federation transforming to confederation. An important question that pops up is whether the increased subnational activity leads to the disintegration of a federal state. Most scholars are of the opinion that constituent diplomacy can hardly be a threat to the unity and integrity of a state.

**Causative factors for increased constituent diplomacy activities**

Certain external and internal factors are responsible for the increased participation of subnational units in international activities. The external factors have a worldwide nature and they are a byproduct of the contemporary developments around the globe. The internal causes include the domestic issues determined by the specific political economic or cultural background of a particular region that forces the subnational units to involve in international activities. Some of the external causes of increased subnational activities are:

**Globalization**

Today globalization has become a ubiquitous phenomenon which influences the domestic and international activities of world nations. Globalization is a multi-faceted phenomenon which has economic, political cultural and social aspects. Globalization has eroded economic and cultural boundaries and has provided constituent units with new avenues in their economic pursuits both within the country and across the borders. Globalization acts as an enabling factor in the international activities of constituent units. The advancements in transportation, communication, and economic integration strengthens the abilities of the constituent states in their engagement with the outside world. The freedom to act
independently brought out as a result of democratization and market liberalization have also produced administrative and governmental decentralization within nation-states. Consequently, constituent diplomacy is more common in countries that have a market-based economy, a democratically elected national government, elected regional and local government officials, competing national or regional political parties, and protections of human rights, including property rights.  

**Regionalization**

In the context of the study of constituent diplomacy, regionalism signifies the increasing role of subnational units in both domestic and international arena. Regionalization usually occurs in a political structure where there is formal or informal distribution of power between the union and regional authorities. It involves the situation in which the union governments are forced to delegate more power and responsibilities to the regional governments. Regionalization is different from federalization because of its global and supranational nature whereas federalization is a domestic force determined by internal historical, political, economic and cultural factors which contributes to the development of a state.

Michael Keating in his article, “The Political Economy of Regionalism” discusses about the three main aspects of regionalization.

1. As a top-down process when union governments begin to involve regional actors in the formulation and implementation of national policy which in turn is a boost to their economic and political status.

2. As a bottom-up process when regional actors demand more political, economic and cultural authority;

3. Regionalism as a response of both the union and the regions on those challenges and opportunities that has emerged in the context of global economic change.

**Democratization**

Constituent diplomacy requires some degree of plurality in decision making process which only a democracy can provide. An increased role for states cannot be imagined in an authoritarian or non democratic regime. The twentieth century has witnessed the transformation of many totalitarian or authoritarian regimes to democratic ones. Scholars like John Kincaid confirm that there is a positive correlation between the spreading of democracy and the bolstering of subnational activities. Democratization becomes an important variable
in analyzing the subnational diplomatic activities in a country which has embraced political liberalization only recently.

**Domestication of Foreign policy and internalization of domestic politics**

Another factor which influences constituent diplomacy is the increasing overlapping between “domestic policy” and “foreign policy” of a country. This overlapping is increasingly visible when it comes to matters of “high politics” and “low politics”. The traditional notion that the matters of “low politics are usually dealt by the regional governments whereas “high politics” issues are handled by the union government is slowly changing. In the era of global warming, environmental issues which are traditionally considered as a low politics issue has gained international significance. Thus the blurring of boundaries between the domestic and international issues has forced the states to increasingly involve in the international activities.

Some of the internal causative factors of constituent diplomacy are:

**Federalization and decentralization**

In a federal country, intergovernmental relations between the union government and the constituent units significantly decide the course of the international activities of the regional forces. The evolution and development of intergovernmental relations is one of the important factors affecting constituent diplomacy. For example the ‘new federalism’ initiatives launched by President Richard Nixon in the United States resulted in the federalization or decentralization of American polity which in turn resulted in the increased constituent diplomacy activities.26

**Problems with the nation building process**

The struggle of the constituent entities to gain statehood and international recognition results in the increased international activities of those units. This actually roots from the problems in nation building of those countries. The countries with a heterogeneous society consisting of different ethnic, linguistic and religious population are more prone to these kinds of activities. These activities usually root from the dissatisfaction of a particular group who try to reassert their position in the territorial organization of state. So this provides union government with an opportunity to try to accommodate different interests and bring them to the mainstream.
Union government’s Incompetence in foreign relations

This usually happens in a federal system of government where the union government is in charge of foreign policy and they are incapable of executing it effectively. This might act as a pulling force for the constituent states to involve in foreign affairs. In some cases sub national governments have more expertise in a particular area and they might collaborate with international actors to reap benefits from it. Many constituent diplomacy projects related to the global problem of climate change are caused, to a large extent, by the fact that union governments frequently fail to demonstrate the necessary political will and leadership to address this ecological issue. Regions can often promote more effective “green” projects in the international scene than the environmental policies proposed by the union governments on similar issues.

Asymmetry of constituent units

Some states in a federal system might be economically prosperous than the rest of the constituent units and hence might look for international opportunities to enhance their trade and commerce activities. The domestic market might not be sufficient for their needs since their growth rate might be at par with some of the developed countries of the world. Thus the regions which are more developed industrially and trade wise usually opt for international ties to develop their existing infrastructure.

External stimulus

The existence of national minorities that are divided between two or more states results in the internationalization of ethnic conflicts which in turn has an impact on the foreign policy of a country. The national governments are forced to involve in the affairs of their neighbouring states due to the ethnic ties of the constituent units which is usually a cause of tension between the union government and the constituent units. The case of India- Sri Lanka relations serve as a very relevant example in this context. The state of Tamil Nadu’s concern for the Tamils affected by the civil war in Sri Lanka and their attempts to influence the union government’s policy decisions regarding Sri Lanka have created tensions in the relations between the union and the Tamil Nadu government. The involvement of India in Sri Lanka’s ethnic conflict and the support extended to the ethnic Tamils by the state of Tamil Nadu had its impact on India- Sri Lanka relations. Similarly the ethnic commonalities between the Bengalis of East Bengal and West Bengal accelerated the influx millions of refugees during the Liberation War of Bangladesh in 1971. West Bengal and the states in northeast India
faced a refugee crisis and pressurized the union government to intervene in the crisis in East Pakistan. Trans-border ethnic ties might force a regional government to root for the neighbouring countries and thus influence the foreign policy initiatives of the federal government according to their interests.

**Regional leadership**

A strong regional leadership might be enthusiastic about the development of the region and might opt for international tie ups to further their economic and political interests. With the formation of regional political parties the regions or constituent units have become more assertive about their needs. Thus it is reasonable to assume that a political shift on the regional level can accelerate or hamper the international activities of constituent units. The role of Chandra Babu Naidu, the Chief Minister of Andhra Pradesh from 1995-2004, in the development of state is worth mentioning in this context. Naidu introduced many market based reforms which gave a fillip to the growth of Information technology (IT) sector in the state. The capital of the state, Hyderabad came to be known as the IT hub of India which attracted a lot of foreign investments to the state. He had openly talked about his vision of making Andhra Pradesh an investment hub like Singapore. Similarly the initiative of Narendra Modi as Gujarat Chief Minister to bring in more investment to the state has made the state one of the most favored investment destinations in India. Thus an able leadership can augment the international initiatives of regional governments.

**The role of borders**

Even though we live in a borderless world due to the advancement in communication and technology, geography plays an important role in international relations. The borders between two countries can have a dual role i.e. to divide people between two countries and at the same time act as vehicles of development for mutual benefit.

Duchacek classifies constituent diplomacy into three, depending on the nature of regional negotiations.

1. Trans-border regional paradiplomacy- this signifies the relation between foreign regions with a common border.

2. Trans-regional paradiplomacy – it is the relation between regions of neighbouring countries without a common border.
3. Global paradiplomacy—this denotes the relations of regions with foreign subnational and central governments where borders do not have a role.27

The regions which have a physical border with neighbouring countries will have more interest and incentives to indulge in trans-border activities. Thus, the first type of constituent diplomacy is the most common model of regional external activities.

**Positive aspects of constituent diplomacy**

Most of the researchers on the area of constituent diplomacy share a positive outlook on the increased influence of states in international activities. According to Soldatos and Atkey, the increased influence of states in foreign policy decisions leads to the rationalization of foreign policy. This rationalization upholds the core idea of federal principle i.e., the union government should delegate to the constituent units the tasks that can be effectively performed by them.28 For example some states in India might hold expertise (skills & knowledge) in a particular area and it might be easier for them to enter into a partnership with a foreign government or agency rather than go through the bureaucratic hurdles of another level of government.

According to Kincaid, “constituent diplomacy is a positive factor for further perfection and democratization of the existing federal polities rather than a threat for statehood and sovereignty concerns about constituent diplomacy generally assume that conflict and cooperation is harmful. Yet, conflict and competition can be beneficial to political systems. In democratic polities, non-violent conflict and competition are not only facts of political life, but also accepted principles of politics. In federal democracies conflict and cooperation between governments are intrinsic elements of political life along with cooperation.” 29

**Negative aspects of constituent diplomacy**

Even though the majority of the scholars of constituent diplomacy focus on the positive aspects of the increased involvement of states in foreign affairs, they do not reject the possibility of some negative effects of this phenomenon. Atkey cautions that subnational activities could be supervised by the union government so that it will not harm the country’s national interest.30 Soldotas asserts the need of harmonization of national and subnational external action as a vital factor for the rationalization of foreign policymaking.31

Soldatos puts forward four models of the functioning of constituent diplomacy. They are:
The cooperative-coordinated model assumes regional involvement in inter-national relations under the formal or informal coordination of the federal government.

The cooperative-joint formula consists of the formal or informal inclusion of constituent diplomacy into national foreign policy.

The parallel-harmony model presumes that regional governments act independently in the international arena, but, at the same time, their actions are harmonized and do not contradict national foreign affairs.

The parallel-disharmony model is the case when regional authorities’ external actions oppose national government policy.\(^{32}\)

The first three principles lead to the positive developments of democratization and rationalization of foreign policy. The fourth principle brings out the dark side of constituent diplomacy since it represents a conflict of interest between the union and subnational units which might lead to the disintegration of a federal state.

Duchacek in his article “Perforated Sovereignties: Towards a typology of new actors in International relations” identifies the concerns of the union government regarding subnational diplomacy. Regional governments’ interaction with foreign governments might result in the increased involvement of such governments in the internal affairs of the federation. Too many subnational initiatives may lead to the fragmentation of foreign policy and the country may be unable to speak in a unified voice in the international arena. There are also chances of regional interests being pursued at the cost of national interest as well as the interest of other territorial communities. There are also concerns about the subnational units’ lack of experience in the international affairs.\(^{33}\)

**Conclusion**

There has been a great deal of quality research on the consequences of constituent diplomacy on the structure of federal systems. Majority of the scholars share the opinion that the increased influence of subnational units in international affairs in a federal system is a favourable development. Since it promotes rationalization and democratization of foreign policy decisions, it is considered as a positive phenomenon. At the same time constituent diplomacy poses certain serious risk factors in a federal system. It might encourage centrifugal forces in a federal system. Constituent diplomacy can be the outcome of the disintegration problems in a country rather than the cause of it. If the states involving in
international affairs deal with issues of low and medium politics it will not be an issue of grave concern since that does not affect the national security of the country.

The increased influence of regional actors on the foreign policy decisions in a federal system is considered as the signs of increased federalization or decentralization which is an outcome of the internalization of federalism. Constituent diplomacy is also viewed from the angle of increased democratization in a federal system since it requires the accommodation of opinions from the grass root actors. The domestic factors and external factors which push the regional actors to indulge in constituent diplomatic activities form an important part of the study. Constituent diplomacy has become a new phenomenon embedded into the theoretical framework of federalism. The studies on the increased influence of constituent units in a federal system has generated discussions on the relation between the principles of sovereignty and federalism and the question of optimum distribution of power between union and regional authorities. Thus the phenomenon of constituent diplomacy has its positive and negative aspects and it is inevitable for a federal system to find ways to find a balance between the two so that it will not affect the basic structure of the federal set up in a country.

Notes and References

3 Ibid, p.50

11 Duchacek, n.4


14 Duchacek, n.10, pp. 3-4


19 Kuznetsov, n.9, p. 70


21 Duchacek, n.4 p. 208

22 Duchacek, n.10, pp. 8–9.


27 Duchacek, n.10, pp. 16–18.


29 Kincaid, n.17, p. 72
30 Atkey, n.27


32 *Ibid*, pp. 38–40

33 Duchacek, n.10, p. 28