Bicameralism is an institutional design for a two-house representative assembly. Unquestioningly accepted in the United States, where the House of Representatives and Senate remain enshrined in the Constitution, bicameralism is neither universally accepted nor practiced. John Stuart Mill, the philosophical architect of representative government, observed in the mid-nineteenth century that “what is known as the question of the Two Chambers” was energetically debated (Mill 1861, 247). Although a powerful inertia in practices of governance constrains serious advocacy of institutional reform, the institutional design feature of “two chambers,” or what Henry Jones Ford dubbed “divided representation,” remains a
cogent focus for inquiry (Ford 1924, 273–94). The contributors to this book dissect senates in nine interesting bicameral systems in order to explore their representational performance and legislative effectiveness in modern polities.

The name senate is the common appellation for this house of the legislature (just as house of representatives is a common name for the other house). Two-thirds of the bicameral assemblies denote one house a senate—the Australian, Canadian, or United States Senate, the Belgian or French Senat, the Senado of Argentina, Brazil, Chile, Colombia, Venezuela, or Spain, the Italian Senato. In the parlance of parliamentary studies, these bodies are often referred to as “second chambers” or “upper houses,” designating the other houses of the legislatures, the popularly elected assemblies chosen on the basis of population, the first chambers or lower houses. Only in the Netherlands is this convention reversed; that country’s national parliament includes a popularly elected house called the Tweede Kamer, or Second Chamber, and an indirectly elected body called the Eerste Kamer, or First Chamber (see van Schendelen et al. 1981). The same was true of the Swedish Riksdag until unicameralism was adopted in 1970 (Metcalf 1987, 189–95). Although we adopt the appellation senate to refer generically to these parliamentary houses, in a number of major democratic countries these chambers bear different names—Bundesrat in Austria and Germany, Rajya Sabha in India, Soviet Federatsii in Russia, House of Lords in the United Kingdom.

The multichambered parliament, which most often took bicameral form, is rooted historically in the highly stratified societies of the Middle Ages, and it reflected “the communal spirit of the medieval world” (Marongiu 1968, 54). In those days, the upper and lower nobility, the clergy, and the townspeople and peasants composed distinct classes, or “estates,” each of which came to meet independently, mainly to contribute revenues to the coffers of the king. Although it had important English origins in the thirteenth century, it was something of a historical accident that these conclaves emerged as two-house parliaments, a pattern that had largely congealed by the later eighteenth century. Whether embracing bicameralism or unicameralism, all of the emergent polities of that era, and later, were influenced by the historical experience of the British House of Lords.

In 1295, Edward I summoned the barons, the clergy, and the commoners to assemble as a parliament (see Ilbert 1911, 7–25; Luce 1930, 72–81;
Sayles 1974, 70–93). They came to meet in two houses rather than three, apparently because of “a series of fortunate accidents” (Marriott 1910, 6). The lower clergy withdrew; the bishops and abbots united with the barons to form the House of Lords; and the knights of the shire joined the burgesses of the towns to shape the incipient House of Commons (see Pollard 1920). Although “the mistiness of long ago obscures the origin of the bicameral organization in the English Parliament,” the House of Lords emerged as a hereditary body whose members, until the enactment of the Life Peerages Act in 1958 permitted nonhereditary membership, were entitled to sit in the House by right of their birth into the nobility (Johnson 1938, 4; Shell 1992). In contrast, the House of Commons evolved as an elected assembly, eventually eclipsing the upper house in legislation and in the formation of governments. British parliamentary practice cast a long shadow over subsequent institutional developments, first on continental Europe and then across an empire.

**Parliaments’ Upper Chambers**

Most of the world’s parliaments are unicameral, consisting of a single legislative chamber. When the Inter-Parliamentary Union most recently took inventory of parliaments, it found that 122, more than two-thirds, were one-house legislatures. They are located mainly in small polities, notably in New Zealand and the Nordic countries—Denmark, Norway, Sweden, Finland, Iceland (see Arter 1984, 16–22; Damgaard 1992). In addition, unicameral legislatures are commonplace at the subnational level—in the Canadian provinces, in the American state of Nebraska, in the German länder except for Bavaria, and in many municipalities around the globe (see, for example, Levy and White 1989; Breckenridge 1957). Upper chambers were abolished in Denmark in 1953 and in Sweden in 1970. In a modified form of unicameralism, the Norwegian Storting, elected as a unicameral body, divides after elections into two separate entities to deal with legislation.

The larger countries of the world tend to have bicameral parliaments, composed of senates and houses of representatives. A notable exception is Peru, where a unicameral Congress of 120 members replaced the traditional bicameral institution in 1993 following a convention that produced a new constitution. Moreover, China has a very large unicameral assembly,
the National People’s Congress; its 2,978 members are elected for five-year
terms (see O’Brien 1990). When the Czech Republic and Slovakia separated
in 1993, the former’s constitution prescribed a bicameral parliament,
while the latter’s provided for unicameralism (see Reschova and Sylova
1996; Malova and Sivakova 1996).

In table 1.1 we array the sixty-one countries whose representative as-
sembly is bicameral, showing the name of the upper house, the size of this
body, term of office, and a brief indication of the means of member selec-
tion. Two-house parliaments are to be found in all parts of the world.
Most of the national representative bodies of countries in the western
hemisphere are bicameral, including Canada and the United States. The
exceptions are the parliaments of Ecuador and Peru, the assemblies of
the small countries of Guyana and Surinam, and the Central American
assemblies, except for Belize. Several small island countries of the West
Indies have two-house legislatures (e.g., the Dominican Republic and Ja-
maica). The senates in the United States and Canada are well known, but
little is known about Latin American senates outside their own countries
(but see Agor 1971; Close 1995; Kelley 1971).

Most of the Western European countries have bicameral parlia-
ments—the United Kingdom, Ireland, France, Belgium, Germany, the
Netherlands, Italy, Spain, Austria, Switzerland (see Mastias and Grange
1987). The national parliament of the Russian Federation is constitution-
ally bicameral, consisting of a Duma and a Council of the Federation (see
Hahn 1996; Remington and Smith 1996, 180–82). In Eastern Europe, bi-
cameralism occurs in Poland, the Czech Republic, Croatia, Romania, and
Yugoslavia. Elsewhere in the world, bicameralism is spread more thinly.
In the Western Pacific region, two-house parliaments are prominent in
Australia, the Philippines, Malaysia, and Japan (and in Fiji and Palau);
in Asia the main exemplars of bicameralism are India, Pakistan, and
Thailand; in the Middle East, Jordan; and in a scattering of small African
countries (Burkina Faso, Congo, Ethiopia, Lesotho, Mauritania, Namibia, Swaziland) and South Africa.

Not only are senates ubiquitous but they vary greatly in size. The Brit-
ish House of Lords is by far the largest, its membership gauged by the
number of peers. Although in 1996 this meant that about 1,200 persons
were members, fewer than half of these are active participants. Omitting
the House of Lords because of its indeterminate active size, the average
senate consists of eighty-three members. Nearly half are small bodies,
with no more than fifty members. The senates of small countries and island republics are the smallest. Nine senates range in size from one hundred to two hundred members—in Burkina Faso, Canada, Colombia, Ethiopia, Mexico, Poland, Romania, the Russian Federation, and the United States. The U.S. Senate, with its one hundred members, is a bit larger than the average upper house. A few senates are quite large, with more than two hundred members: France, India, Italy, Japan, Spain, and Thailand.

In the United Kingdom and Canada, members of the upper chamber can serve for life, and in both Germany and the Russian Federation, the terms of members are indefinite, though not guaranteed for life. Elsewhere, senators serve for a fixed term, which varies from three years in Burkina Faso and Malaysia to nine years in France. Six-year terms, like that for U.S. senators, are not uncommon, but two-thirds of all members of upper houses serve terms of five years or less. In some cases the terms of members are stratified so that only a third or half of the senate membership is chosen in any one election.

As table 1.2 indicates, senators are elected, directly or indirectly, in 34 of the 61 senates, but in only 19 senates are all members directly elected. Members of the U.S. Senate were elected indirectly—by the state legislatures—until the Constitution was amended in 1913 to require direct popular election of members (Haynes 1906; Abramowitz and Segal 1992, 12–26). In Italy and Spain most senators are directly elected, but some are elected indirectly or appointed. Members of the French Sénat are selected by departmental electoral colleges, composed of members of the National Assembly, and by regional and local council members. In yet another seventeen upper chambers, all of the senators are appointed. Membership in the British upper house is, of course, made up of hereditary peers and persons appointed to peerages for life. Canadian senators are appointed for life, and appointments are a patronage plum for the prime minister. Members of the German Bundesrat are appointed by the state governments in numbers allocated to them roughly in proportion to the state’s population. In other senates, members are appointed by the government, by the head of state, or by the king.

Members of senates are appointed on the basis of varying criteria and premises, and they take on different responsibilities and constitutional obligations. Indeed, these bodies are, at least outwardly, unique aggregations, each with its own history, its special traditions and customs,
<table>
<thead>
<tr>
<th>Country</th>
<th>Upper House</th>
<th>No. of Members</th>
<th>Term (Years)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antigua &amp; Barbuda</td>
<td>Senate</td>
<td>17</td>
<td>5</td>
<td>All appointed</td>
</tr>
<tr>
<td>Argentina</td>
<td>Senado</td>
<td>72</td>
<td>6</td>
<td>½ indirectly elected every 2 years</td>
</tr>
<tr>
<td>Australia</td>
<td>Senate</td>
<td>76</td>
<td>6</td>
<td>½, plus 4 territorial senators, elected every 3 years</td>
</tr>
<tr>
<td>Austria</td>
<td>Bundesrat</td>
<td>64</td>
<td>5-6</td>
<td>Indirectly elected; term varies by province</td>
</tr>
<tr>
<td>Bahamas</td>
<td>Senate</td>
<td>16</td>
<td>5</td>
<td>Appointed by the governor-general</td>
</tr>
<tr>
<td>Barbados</td>
<td>Senate</td>
<td>21</td>
<td>5</td>
<td>Appointed by the governor-general</td>
</tr>
<tr>
<td>Belarus</td>
<td>Soviet Republiki</td>
<td>64</td>
<td>4</td>
<td>56 indirectly elected; 8 appointed by the head of state</td>
</tr>
<tr>
<td>Belgium</td>
<td>Sénat</td>
<td>71</td>
<td>4</td>
<td>40 directly elected; 31 elected indirectly or co-opted</td>
</tr>
<tr>
<td>Belize</td>
<td>Senate</td>
<td>8</td>
<td>5</td>
<td>Appointed by the governor-general</td>
</tr>
<tr>
<td>Bolivia</td>
<td>Cámara de Senadores</td>
<td>27</td>
<td>4</td>
<td>Directly elected</td>
</tr>
<tr>
<td>Bosnia-Herzegovina</td>
<td>Dom Naroda</td>
<td>15</td>
<td>2</td>
<td>10 appointed from Bosnia, 5 from Republika Srpska</td>
</tr>
<tr>
<td>Brazil</td>
<td>Senado Federal</td>
<td>81</td>
<td>8</td>
<td>½, then ¾, elected every 4 years</td>
</tr>
<tr>
<td>Burkina Faso</td>
<td>Chambre des Représentants</td>
<td>178</td>
<td>3</td>
<td>Appointed or indirectly elected</td>
</tr>
<tr>
<td>Canada</td>
<td>Senate</td>
<td>104</td>
<td>Life</td>
<td>Appointed by the governor-general</td>
</tr>
<tr>
<td>Chile</td>
<td>Senado</td>
<td>46</td>
<td>8</td>
<td>38 elected, ½ every 4 years; others appointed</td>
</tr>
<tr>
<td>Colombia</td>
<td>Senado</td>
<td>102</td>
<td>4</td>
<td>Directly elected</td>
</tr>
<tr>
<td>Congo</td>
<td>Sénat</td>
<td>60</td>
<td>6</td>
<td>½ indirectly elected every 2 years</td>
</tr>
<tr>
<td>Croatia</td>
<td>Zupanijski Dom</td>
<td>68</td>
<td>4</td>
<td>63 directly elected; 5 appointed by the head of state</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>Senat</td>
<td>81</td>
<td>6</td>
<td>½ directly elected every 2 years</td>
</tr>
<tr>
<td>Dominican Republic</td>
<td>Senado</td>
<td>30</td>
<td>4</td>
<td>Directly elected</td>
</tr>
<tr>
<td>Ethiopia</td>
<td>Yefedereshn Mekir Bet</td>
<td>120</td>
<td>5</td>
<td>Directly or indirectly elected</td>
</tr>
<tr>
<td>Fiji</td>
<td>Senate</td>
<td>34</td>
<td>4</td>
<td>Appointed by the head of state</td>
</tr>
<tr>
<td>Country</td>
<td>Type</td>
<td>Members</td>
<td>Term</td>
<td></td>
</tr>
<tr>
<td>------------------------</td>
<td>-----------------------</td>
<td>---------</td>
<td>------</td>
<td></td>
</tr>
<tr>
<td>France</td>
<td>Senat</td>
<td>321</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Gabon</td>
<td>Senat</td>
<td>91</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Germany</td>
<td>Bundesrat</td>
<td>69</td>
<td>Varies</td>
<td></td>
</tr>
<tr>
<td>Grenada</td>
<td>Senate</td>
<td>245</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Haiti</td>
<td>Senat</td>
<td>27</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>India</td>
<td>Rajya Sabha</td>
<td>272</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Ireland</td>
<td>Seanad Eireann</td>
<td>60</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Italy</td>
<td>Senato</td>
<td>320</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Jamaica</td>
<td>Senate</td>
<td>21</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Japan</td>
<td>Sangiin</td>
<td>252</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Jordan</td>
<td>Majlis al-Aayan</td>
<td>40</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Kazakhstan</td>
<td>Senate</td>
<td>47</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Kyrgyzstan</td>
<td>Majlis Chygaru Palatasy</td>
<td>35</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Lesotho</td>
<td>Senate</td>
<td>33</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Malaysia</td>
<td>Dewan Negara</td>
<td>69</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Mauritania</td>
<td>Majlis al-Chouyoukh</td>
<td>56</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Mexico</td>
<td>Cámara de Senadores</td>
<td>128</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Namibia</td>
<td>National Council</td>
<td>26</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Nepal</td>
<td>Rastriya Sabha</td>
<td>60</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Netherlands</td>
<td>Eerste Kamer</td>
<td>75</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Pakistan</td>
<td>Senate</td>
<td>87</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Palau</td>
<td>Senate</td>
<td>14</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Paraguay</td>
<td>Cámara de Senadores</td>
<td>45</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Philippines</td>
<td>Senado</td>
<td>24</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Poland</td>
<td>Senat</td>
<td>100</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Romania</td>
<td>Senatul</td>
<td>143</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Russian Federation</td>
<td>Soviet Federatsii</td>
<td>178</td>
<td>Varies</td>
<td></td>
</tr>
</tbody>
</table>

1/indirectly elected every 3 years
Indirectly elected
Appointed by the lord
Appointed by the governor-general
2/33 elected by legislatures, 3/4 every 2 years
49 elected, 11 appointed by the prime minister
3/15 directly elected; 11 are senators for life
Appointed by the governor-general
1/33 elected every 3 years
Appointed by the king
40 indirectly elected every 2 years; 7 appointed
Directly elected
22 principal chiefs, 11 others appointed by the king
26 indirectly elected; 43 appointed by the head of state
1/indirectly elected every 2 years
5/33 elected every 3 years
Indirectly elected
50 elected, 3/4 every 2 years; 10 named by the king
Indirectly elected
1/indirectly elected every 3 years
Directly elected
Directly elected
Directly elected
Regional authorities; terms vary by republic

(continued)
<table>
<thead>
<tr>
<th>Country</th>
<th>Upper House</th>
<th>No. of Members</th>
<th>Term (Years)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Saint Lucia</td>
<td>Senate</td>
<td>11</td>
<td>5</td>
<td>Appointed by the governor-general</td>
</tr>
<tr>
<td>South Africa</td>
<td>National Council</td>
<td>90</td>
<td>5</td>
<td>Elected by provincial legislatures</td>
</tr>
<tr>
<td>Spain</td>
<td>Senado</td>
<td>257</td>
<td>4</td>
<td>208 elected directly; 49 indirectly elected</td>
</tr>
<tr>
<td>Swaziland</td>
<td>Senate</td>
<td>30</td>
<td>5</td>
<td>10 elected; 20 appointed by the head of state</td>
</tr>
<tr>
<td>Switzerland</td>
<td>Ständerat</td>
<td>46</td>
<td>4</td>
<td>Directly elected</td>
</tr>
<tr>
<td>Thailand</td>
<td>Wuthisapha</td>
<td>260</td>
<td>4</td>
<td>Appointed by the head of state</td>
</tr>
<tr>
<td>Trinidad &amp; Tobago</td>
<td>Senate</td>
<td>31</td>
<td>5</td>
<td>Appointed by the head of state</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>House of Lords</td>
<td>1,067</td>
<td>Life</td>
<td>633 hereditary peers; 408 life peers; 26 clergy</td>
</tr>
<tr>
<td>United States</td>
<td>Senate</td>
<td>100</td>
<td>6</td>
<td>(\frac{1}{2}) elected every 2 years</td>
</tr>
<tr>
<td>Uruguay</td>
<td>Cámara de Senadores</td>
<td>31</td>
<td>5</td>
<td>30 directly elected, plus vice president of Republic</td>
</tr>
<tr>
<td>Venezuela</td>
<td>Senado</td>
<td>52</td>
<td>5</td>
<td>50 directly elected, 2 appointed for life</td>
</tr>
<tr>
<td>Yugoslavia</td>
<td>Vece Republika</td>
<td>40</td>
<td>4</td>
<td>Indirectly elected</td>
</tr>
</tbody>
</table>

its time-honored norms and practices, its constitutional status, and its impact on the laws of the land. Yet, for all their wonder and variety, the world’s senates share much in common in their underlying justification, purpose, and rationale. In short, senates allow for differentiation in political representation, and they provide the redundancy in policy making that may prevent error, delay action until alternatives have been vetted satisfactorily, or postpone decisions until the disputants achieve consensus. Accordingly, the theory of bicameralism underscores both representation and redundancy.

The Theory of Bicameralism

Why do so many countries, large and small, maintain bicameral parliamentary institutions? What is the theory lying behind the long-standing practice of bicameralism? Articulating a theory of bicameralism has preoccupied both scholars and practitioners for many years (Loewenberg and Patterson 1979, 120–25; see also Lees-Smith 1923; Marriott 1910; Money and Tsebelis 1992; Roberts 1926; and Temperley 1910). It is a tribute to the hidden power of tradition and inertia in the governing affairs of human beings that fundamentals of institutional design are rarely laid open to full appraisal. Institutions tend to be accepted at face value. Whether the legislature has one house or two is taken for granted by practitioners, observers, and citizens. “Bicameralism,” says Richard F. Fenno Jr., “is a political commonplace in the United States. The division of our national legislature into two separate bodies was little debated in 1787, and it has been taken for granted ever since” (1982, vii). And yet,

<table>
<thead>
<tr>
<th>Method of Selection</th>
<th>Number of Senates</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directly elected</td>
<td>19</td>
<td>31.1</td>
</tr>
<tr>
<td>Indirectly elected</td>
<td>12</td>
<td>19.7</td>
</tr>
<tr>
<td>Some elected directly, some indirectly</td>
<td>3</td>
<td>4.9</td>
</tr>
<tr>
<td>Some elected, some appointed</td>
<td>10</td>
<td>16.4</td>
</tr>
<tr>
<td>All appointed</td>
<td>17</td>
<td>27.9</td>
</tr>
<tr>
<td>Total</td>
<td>61</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Source: calculated from table 1.1.
especially outside the settled context of the American regime, these institutions can arouse intense debate about their justification, the constitution of their membership, and the rectitude of their leverage, or lack of it, over public policies.

**Representation**

A powerful justification for a two-house parliament lies in demands for representation. According to the theory, one house is composed of popularly elected members representing the citizens directly. The other house, with a different basis of representation, may give voice to the interests of social classes, economic interests, or territorial diversity. The most common basis upon which senates have been constitutionally anointed is to provide territorial representation. In particular, federal systems are highly conducive to bicameralism in which a senate serves as a federal house whose members are selected to represent the states or provinces. The paradigmatic federal house is the U.S. Senate, whose one hundred members are distributed territorially on the basis of two senators for each of the fifty states regardless of differences in state population size.

Unitary nations tend to establish unicameral parliaments, while federal nations tend to create bicameral assemblies. When the Inter-Parliamentary Union took stock of national parliaments in 1983, it found that only one federal country, Comoros, was managing with a unicameral parliament, the Assemblée Fédérale. In 1992, a new constitution was adopted in Comoros providing for an elected senate, but this body has not yet been formed. The IPU survey found that fifty-four of sixty-six unitary countries had unicameral parliaments; only a dozen were bicameral (Inter-Parliamentary Union 1986, 14). At the same time, most of today's bicameral parliaments are operating in unitary systems. Only eighteen (about a third) of the sixty-one senates shown in table 1.1 are located in federal systems.

This is not to say that territorial considerations are not reflected in the parliamentary structures of unitary states. Certainly, the provision of territorial representation is not confined to the federal senates. In France, with its unitary constitution, senators are chosen so as to represent the departments and overseas territories and French citizens living outside France (Mastias 1980). The Spanish Senate is based on territorial representation, although Spain is a unitary state. Each province is accorded
four senators, and Senate membership is allocated to islands and other territories. Unitary Bolivia’s twenty-seven senators are territorially distributed—three for each of the country’s nine departments regardless of their population. By the same token, Chilean senators are elected from the country’s thirteen regions, six of which return four senators and seven of which return two senators (Agor 1971; Nef and Galleguillos 1995).

When the founders of the American republic convened in Philadelphia in 1787 to forge a new constitution for the United States, almost all of the delegates to the constitutional convention favored a bicameral national legislature (Baker 1988). Eleven of the states’ legislatures were bicameral—all but those in Pennsylvania and Georgia (Main 1967; Moran 1895). It is true that the so-called New Jersey Plan proposed a unicameral Congress, but delegates readily agreed that unicameralism was one of the defects of the Articles of Confederation, which they were bound and determined to replace with a new basic law. The Virginia Plan proposed a bicameral Congress, with the Senate to be elected by members of the House of Representatives. In the Connecticut Compromise, convention delegates agreed on a Congress in which the lower house would be popularly elected (limited to white male suffrage), its membership allocated to the states in accord with their census population, and in which an upper house, the Senate, would be based on equality of state representation, with two senators selected by each state legislature.

This “federal solution” was little discussed by the founders beyond acknowledging their belief that this would resolve worries about the relative advantage of large as opposed to small states in the new constitutional system. At the time of the founding, the Compromise was essential to resolve the fear of the representatives of small states like Delaware or Connecticut that their states would be dominated by large states like New York or Virginia, a fear placated by giving each state two senators regardless of differences in population (see Jillson 1988, 64–100). Conceived as a federal house, the Senate largely ceased to be so after the Civil War of the 1860s, and Lord Bryce noted at the end of the nineteenth century that there never had been “any division of interests or consequent contests between the great States and the small ones” after the implementation of the new federal constitution (Bryce 1893, 1: 99). The Senate simply did not develop as a federal house, a council of states, certainly not in the way in which the German Bundesrat directly represents the länder (see Riker 1955; Swanstrom 1985, 15–18, 154–74).
At the same time, even today the U.S. Senate is thought to reflect the representation of states in the federal governing apparatus, and the equal representation of states in the Senate, however undemocratic as a mode of apportionment, is virtually unchallenged. Moreover, in a number of federal countries—Australia, Canada, Switzerland, Latin American federal systems—states unequal in population are equally represented in the legislature's upper house (see Duchacek 1970, 244–52). The new South African upper chamber, with limited powers, is specifically intended to give voice to the provinces (see O'Brien 1997). Finally, considerations of political representation other than territorial ones may enter into the calculations. Historically, social classes provided an important representational basis for bicameralism. At the time of the founding of the American republic, many advocated a senate that would especially represent the gentry, the rich. Functional representation has been proposed, and most members of the present Senead of Ireland are chosen in functional clusters—in culture and education, agriculture, labor, industry and commerce, public administration, and social services.

Redundancy

A further line of theorizing about bicameralism concerns the value of redundancy. A second chamber, so the theory goes, "provides for a second opinion" (Wheare 1967, 140). There are differences among countries in the gravity of this opinion. In the United States, both for Congress and for the forty-nine bicameral state legislatures, or in Italy, the two houses carry equal powers, and laws must be approved by both. In the American case, a truly "bicameral perspective" is in order, a viewpoint that recognizes the coequality of the two legislative houses such that they provide a checking and balancing of one another (see Fenno 1982). In the Italian case, the Chamber of Deputies and the Senate are coequal constitutionally. Both must enact legislation, and governments must be invested by and enjoy the confidence of both chambers (Furlong 1990). But in most parliaments, the upper house is subordinate to the lower. Like the British House of Lords, upper houses are commonly empowered only to revise, reconsider, or delay, and constitutional provisions govern the circumstances under which the upper house can be overridden by the lower house.

That the strength of bicameralism lay in the capacity of the senate to
check the actions of the putatively more popular lower house was firmly defended by John Stuart Mill in the mid-nineteenth century. He argued that "a majority in a single assembly, when it has assumed a permanent character ... easily becomes despotic and overweening, if released from the necessity of considering whether its acts will be concurred in by another constituted authority" (Mill 1861, 249). Lord Bryce, who wrote profusely about American government and who chaired a commission on the status of the upper chamber in Britain in 1917–18, echoed Mill's view, saying that "the chief advantage of dividing a legislature into two branches is that the one may check the haste and correct the mistakes of the other" (Bryce 1893, 1:183; Lees-Smith 1923, 216–35; Roberts 1926, 37–136).

In the United States, both houses of the 104th Congress were controlled by Republican Party majorities for the first time in four decades. The aggressive House Republican majority passed several bills in 1995 from its partisan "Contract with America" that were not acceptable to Senate Republican leaders. The Senate balked, and compromises were reached. "We are the pause that refreshes," remarked a Senate leadership staff member (Washington Post National Weekly Edition, June 5–11, 1995, p. 13). The check of one house upon the actions of another, the institutionalized second opinion provided by bicameralism, is argued in various ways. One line of argument stresses the critical review that one house may accord to the other; the argument usually takes the form of asserting a revisory role for the upper house. The upper house contributes to legislative performance by virtue of its capacity to review and revise.

In so doing, the senate may ferret out and correct errors in lawmaking made by the popular house, permit "second thoughts" about provisions of law, and check the influence of interest groups. Another line of argument stresses the virtues of delay or reconsideration to allow the expression of public sentiments on policy issues of the day or to dampen or mitigate popular passions or hasty judgments (e.g., see Riker 1992). Then a line of argument stresses the importance of a second chamber to prevent the corruption or usurpation of power by the other body, by the executive, or by special interests. But, of course, provision of redundancy may be twisted by institutional design, so that senates may be established or elected to protect a ruling elite, providing, as in Chile in the early 1990s, a "democratic facade" intended to preserve the political influence of authoritarian forces (Nef and Galleguillos 1995, 124–28).

This line of theorizing about bicameralism unfolded most vividly in
the debates over the constitution of the U.S. Senate. The American founders assumed the new Congress would be bicameral in some form. Uppermost in their thinking was the belief that a second chamber was needed to provide essential checks on a democratic lower house. James Madison elaborated the basic theory when he spoke to the Constitutional Convention about the makeup of the Senate (Madison 1893, 241–42):

In order to judge of the form to be given to this institution, it will be proper to take a view of the ends to be served by it. These were, first, to protect the people against their rulers, secondly, to protect the people against the transient impressions into which they themselves might be led. A people deliberating in a temperate moment . . . on the plan of government most likely to secure their happiness would first be aware that those charged with the public happiness might betray their trust. An obvious precaution against this danger would be to divide the trust between different bodies of men, who might watch and check each other.

By the same token, Madison argued that the popular house might be "liable to err . . . from fickleness and passion" and that a second chamber would provide "a necessary fence against this danger" (1893, 242). "Great advantages," said Oliver Ellsworth to the Convention, "will result in having a second branch endowed with the qualifications . . . [of] weight and wisdom [which] may check the inconsiderate and hasty proceedings of the first branch" (quoted in Wood 1969, 556).

Madison offered a fulsome and spirited defense of the Senate in Federalist no. 62, one of the newspaper articles written in support of ratification of the proposed new Constitution by the states. There he argued, first, that bicameralism was essential to prevent "usurpation or perfidy," and, second, that a senate was needed because of "the propensity of all single and numerous assemblies to yield to the impulse of sudden and violent passions, and to be seduced by factious leaders into intemperate and pernicious resolutions." This line of theorizing was echoed in the state ratifying conventions; for instance, Alexander Hamilton told the New York Convention that "there ought to be two distinct bodies in our government," including a senate to provide "a certain balance and mutual control" (Elliot 1907, 2:302).
The institutional value of redundancy provided by bicameral parliaments is underscored by a simple story drawn from the dawn of the American republic. Thomas Jefferson, absent from the Constitutional Convention and distant from ratification politics because he was on a diplomatic mission for the United States in France, met George Washington for breakfast upon his return from Paris. He asked Washington why the founders had created a second house of Congress, the Senate. Thereupon Washington asked, “Why did you pour your coffee into your saucer?” Jefferson replied, “To cool it.” “Even so,” Washington responded, “we pour legislation into the senatorial saucer to cool it” (retold in Sundquist 1992, 27). The metaphor persists. Late in 1995, when the conservative Republican leadership of the House of Representatives and the more moderate Republicans of the Senate were at loggerheads over budgetary legislation, Senate Majority Leader Robert Dole (R-Kans.) said, “We are going to let [the House’s] coffee cool” (National Journal, November 11, 1995, p. 2800).

In order for the lawmaking process to reach closure in a system of cameral redundancy, processes have to be invented by means of which legislative differences between the two houses may be resolved. Generally speaking, parliaments have developed two essential procedures for intercameral resolution: conference committees and a “shuttle” system. Some senates are primarily involved in one process, some utilize the other, and some senates practice both. When the conference committee procedure is in play, each of the parliamentary houses chooses some of its members to serve on a joint committee, the conference, to iron out differences. When the shuttle system (in some places called the “navette” system) is operating, bills simply pass from lower to upper house until both have adopted the same version of the bill. These interactions between the two bodies of parliament may substantially influence how each component institution operates (see Tsebelis and Money 1997).

The theorizing that leads to parliamentary bicameralism grounded in conceptions of representation and redundancy is, of course, open to challenge. Proponents of unicameralism have attacked the elitism in the selection of members of upper houses, such as the hereditary British House of Lords or the life-appointed Canadian Senate. Elsewhere, national senates are often under fire for their unrepresentativeness, where equal representation is provided to unequal territories, where electoral
units are malapportioned, or where electoral processes are undemocratic. In parliamentary regimes, bicameralism may be challenged on the ground that the second house interferes with the normal relationship of political responsibility between the lower house, the putatively democratic body, and the executive.

The existence of a second chamber may be attacked on purely operational grounds. A senate is said to produce obstruction and frustration of the popular will more often than contributing salutary delay, and it may particularly do so when the two houses are in the hands of different political party majorities. Senates introduce inefficiencies in the processing of important legislation, and they may fail to provide a critical review of legislative proposals. Considerations such as these help to account for the fact that most national parliaments have only a single house and the fact that reform and change in the bicameral systems of many countries is, or has been, a zesty aroma in the political air.

Institutional Change

Legislatures, like political institutions generally, are both institutionally tenacious and subject to change. Sometimes landmark legislation epitomizes the profundity of legislative change. The Parliament Act of 1911 effected a fundamental constitutional change in Great Britain, removing the power of the House of Lords to veto legislation passed by the House of Commons and replacing this with merely the power to delay. The Legislative Reorganization Act of 1946, adopted by both houses of the U.S. Congress, streamlined and modernized the operations of Congress, including the Senate, ushering in the "modern" Congress (Davidson 1990).

Garden variety institutional change occurs as senates adapt to major events, changing political realities, and evolving political conventions and norms. The oldest senates have evolved over a very long period. The venerable British House of Lords has survived as an institution because it was possible to make institutional adaptations as conditions changed. Donald Shell has observed (1992, 28):

Between the House of Lords of today and its predecessor body of 600 years ago there is an unbroken institutional continuity, but along with this continuity there has also been great change. The House of Lords has become more meritocratic and rather less aristocratic. From
being the senior part of Parliament it has become very much a junior part. More recently, from being an ill-attended body sustained by the enthusiasm of a few amateur, part-time or retired politicians, it has become much better attended and a partly professional House. From Parliament to Parliament significant, if subtle, changes are continuously evident. The institution may be the same body as existed centuries ago, yet it is also completely different.

While it may be true that, if there were no House of Lords today, no one would seriously propose establishing one, there is a remarkable inertia that attenuates change in these traditional institutions.

Arguing that the drafters of the U.S. Constitution surreptitiously “intended the Senate first and foremost to resemble in its form the British House of Lords,” Elaine K. Swift trenchantly documents the evolution of the Senate over its first half century (1996, 10). She shows that in the early 1800s the Senate was largely reactive legislatively, insulated, and executive-centered, but that by 1841 it had become a body we would largely recognize today, with stronger links to the people and weaker bonds to the state legislatures, more proactive legislatively, and more independent of the executive (Swift 1996, 140). More recently, changes in the Senate as an institution since 1950 have transpired largely because of the rapid growth of policy demands on the body, the enlargement and diversity of groups active in the policy community of the national capital, and dramatic shifts in the policy agenda of the nation (Sinclair 1989). Rarely under any threat of reform from external forces, secure in the constitutional constellation, and under very little pressure for change internally, the Senate has, nevertheless, transmogrified over two centuries so that today it is quite a different institution than it was in the beginning.

Unicameral movements have emerged in some polities with bicameral parliaments, seeking to abolish the senate. The American state of Pennsylvania may have embraced the first bicameral legislature to go unicameral. In the last two decades of the seventeenth century the Pennsylvania legislature was bicameral, but in 1701 proprietor William Penn granted a charter to the colony establishing a one-house legislature, the Assembly (Johnson 1938, 33). Pennsylvania’s legislature remained unicameral until a new constitution was approved in 1790. The second switch to unicameralism occurred in the state of Georgia. The colonial legislature was bicameral, but when its leaders framed the first state constitution in 1777,
a one-house legislature was established. The state returned to bicameralism when its constitution was revised in 1789 (Moran 1895, 50). After the Vermont legislature went bicameral in 1836, all of the American state legislatures took bicameral form until Nebraska abolished the state senate in 1934 (Breckenridge 1957). Nebraskans call their legislature the “unicameral,” its members are referred to as “senators,” elections are non-partisan, and the speaker of the house does not preside (see Comer and Johnson 1978).

There have been three celebrated cases of abolition of upper houses since World War II: in New Zealand (1950), Denmark (1953), and Sweden (1971). All three are small, unitary systems with a parliamentary form of government. All essentially inherited bicameralism from a previous undemocratic regime (see Longley and Olson 1991). In New Zealand a failed upper house, the Legislative Council, was abolished when it became clear that parliament was “functioning smoothly without the effective participation of an upper chamber” (Jackson 1972, 183). At the same time, New Zealanders have not abandoned the concept of bicameralism. On the contrary, “discussion of the values attributed to bicameralism has lingered as an important element permeating New Zealand political life over the past forty years” (Jackson 1991, 43).

In Denmark and Sweden, upper houses were dispatched without regret, and the unicamerals made their adjustments to the new parliamentary realities (see Arter 1991; von Sydow 1991). Over time, the Danish Folketing and the Swedish Riksdag have become weightier, more influential parliaments with firmer party organization and more significant committee systems. The strengthening of parliaments in Denmark and Sweden, as in the Nordic countries generally, owes much to party system changes and particularly to increased party conflict and competition. Cameral change effects have not been trivial, but soon these were eclipsed by adaptation to changed electoral laws, altered intraparliamentary party structure, and a new and stronger hand of parliament in relations with the executive (Damgaard 1992).

Today, the senates of the world are undergoing change. Some, like the Canadian Senate, are under strong pressure to reform. Others, like the U.S. Senate, have become more institutionally open and more electorally sensitive. The British House of Lords has developed greater professionalism as a legislative body and become more effective. The German Bundesrat has been called upon to absorb representation from the states
of formerly Communist East Germany. In other settings—Poland, Romania, South Africa, Spain—senates have recently become substantially more democratic. Scholars have yet to fully assay and record institutional development and change in many countries, and the truth is that most senates are little understood and fertile locales for inquiry. The authors of the chapters to follow aim to begin a wider and deeper tradition of research on senates and on parliaments or legislatures more generally.

Senates of the Contemporary World

Comparative analysis of the upper chambers of parliaments should begin with an institutional perspective. Parliaments are political institutions sine qua non—they tend to be firmly rooted in their constituencies, their institutional boundaries are well defined, their internal official and informal organizations tend to be well established, their memberships tend to be highly stable, the rules and norms governing their policy processing are characteristically formalized, and their linkages to other political institutions, particularly the executive and judicial branches of government, are well worn if sometimes controversial. The first steps in the comparative study of institutions like parliaments must entail rich, or "thick," description of their emergence as distinctive bodies, their constitutional status, their powers, their organizational structure and leadership, their modus operandi, and their ties to the other key actors in the political process.

In an ideal scholarly world, we would have available to us detailed descriptions and analyses of every one of the sixty-one upper houses of today's parliaments. This would permit us to understand each of these institutions in their own right, embedded in their own national setting, their distinctive constitutional status, their own institutional history, their own social, political, and economic environment, and their own institutional context. It would give us the basis for constructing and estimating models about how things senatorial actually work, how politicians' and citizens' preferences and interests unfold into public policies through legislative processing.

Moreover, a portfolio of knowledge about the senates of this world would let us make comparisons, constructing informative typologies of senate institutions and taking measurements of aggregate institutional
properties for the sake of testing ideas about the institutionalization, representation, or performance of these bodies. Trespassing the micro- and macrolevels of parliamentary life, we could come to better terms with questions about how representative bodies work, what makes them so robust and lasting, why they change and sometimes disappear, and what effects their members and the institutions have upon political legitimacy, public policies, politicians' careers and satisfactions, public well-being and happiness, and the future of human governance. These are heady prospects.

There are nine country chapters in this book. The cases have been chosen because they vary along several interlocking dimensions of potential importance to senates' performance of their representational and redundancy functions in democratic political systems. The executive-controlled senates so prevalent in Third World countries are absent entirely from our purview. The factor most commonly thought to influence the political role of senates is the structure of the state, federal or unitary. Thus we have four federal systems (the United States, Germany, Australia, and Canada) and five unitary ones (France, Britain, Italy, Spain, and Poland). The effects of state structure, however, can be mitigated, even neutralized, by differences that cut across this federal-unitary distinction.

Our selection of cases allows us to take into account the effects of a number of these cross-cutting influences. The first of these is formal powers. Some federal senates (e.g., the United States) enjoy coequal powers with the lower house, but unitary ones can, too (e.g., Italy). Another difference concerns the representation of territories. Federal senates do not always have a territorial representational base—witness Canada. Equally, unitary senates sometimes allow for such representation—witness France and Spain.

Yet another difference taken into account by our selection of cases is the election, direct or indirect, or appointment of senate members. Federal and unitary senates alike are sometimes elected, directly or indirectly, and sometimes appointed. Again, senates vary in their political party makeup and in the parties' linkages out in the countryside. The party composition of the upper house can foster gridlock when partisan differences divide the upper and lower houses or, alternatively, mitigate bicameralism when both houses enjoy the same party structure. Finally, we have age. Some senates, federal and unitary alike, are centuries old and operate within a long-established structure of democratic government
(e.g., the U.S. Senate and the British House of Lords), whereas others, like the Polish one, have only recently come into existence and operate within democracies struggling to find their feet. In short, this book provides an in-depth examination of the performance of the representational and redundancy functions in nine upper houses that vary greatly in their constitutional powers and in both the governmental framework and political culture in which they routinely operate.

Although in recent years scholars have given some attention to the U.S. Senate, and there is a bit of new work on the British House of Lords, for the most part these senates are barely known to the scholarly world. There is a small literature in French on the French Sénat. But for some of these parliamentary bodies—the Italian Senato, the Spanish Senado, or the Polish Senat—there is virtually no analytical writing in the language of these countries, not to mention in English. Scholarly inquiry, such as it is, has leaned more in the direction of investigating abolished upper chambers, or relations between bicameral chambers, than dissecting the upper body as an institution in its own right (see Longley and Olson 1991; Tsebelis and Money 1997).

Given the primitive state of knowledge about most parliamentary bodies, we eschewed any attempt to construct a procrustean formula for the chapters. It also seemed to us that comparison and analytical conclusions are better promoted by grouping the chapters in federal and unitary clusters rather than by shared history or geography. Comparing within and across these groupings provides a better understanding of the forces promoting or impeding senates' performance of their representative and redundancy functions. We think of the effort as exploratory, defining the agenda of a larger program of research on parliamentary life as much as, or more than, expanding knowledge about how senates work in a variety of interesting political systems.

Our anthology begins with the senates in federal systems because in these countries bicameralism flowed easily from the rationale that a parliament should include one body representing the people of the nation as a whole and another body representing the component territories of the national federation. Because they were obliged to give strong priority to federal structure in devising their constitutions and institutional arrangements, the Anglo-American countries (the United States, Canada, and Australia) and Germany established a chamber of parliament explicitly to reflect their federal origins and the centrality of subnational units in
national territorial expansion. Although the federal character of these upper chambers has, in many cases, diminished in importance, these federal senates experienced elements of common ancestry and purpose.

Bicameralism is readily identifiable with federal systems, where representation and geography entwine. We consider upper houses in five unitary states (France, Britain, Italy, Spain, and Poland) as a cluster to underscore the option of institutional design available to unitary systems. On account of historical inertia, in order to especially represent crucial social classes or interests, or to institutionalize policy processing that would embrace redundancy and protect minorities, unitary systems may establish bicameral parliaments including more or less consequential upper houses. Unitary systems with particularly strong inclinations to create barriers against rash policy decisions, provide extended deliberation before action, or permit checks and balances so that an upper house can correct the errors, technical or political, of a more popular and impulsive lower house, will consider bicameralism. Moreover, formally unitary systems may wish to provide special representation for territorially rooted racial, nationality, or ethnic subgroups, or create institutional recognition of policy devolution to subnational units (states, provinces, or "autonomous communities"). France, Italy, and Spain are systems in which subnational units are, or have sought, some kind of representation in a parliamentary upper house.

In summary, the distinction we are drawing is epitomized by comparing the United States and the United Kingdom, a confederation with a federal senate and a unitary system with an upper house in parliament. As two recent scholars of bicameralism have argued, "Britain and the United States represent two distinct models of institutional development. Other European states experienced some linear combination of these two paths. Confederations tended to adopt a bicameralism in which 'the people' were represented in the lower house, while the constituent states were represented in the upper house. Unitary states tended to reserve the upper house for elite classes to offset the political power of 'the people' in the lower house. In both cases, however, the two houses tended to have equal legislative power." In short, it makes great good sense to begin an inquiry of parliamentary upper chambers by comparing and contrasting federal and unitary senates (Tsebelis and Money 1997, 32).

Table 1.3 presents skeletal information about the four federal senates in our analysis. In these federal systems, significant subnational units exist
that possess semisovereign constitutional power. Interestingly, three of these—the American, Australian, and Canadian—grew out of British, or Westminster, parliamentary tradition and practice, despite the fact that the United Kingdom always has been a unitary state. The formation of the post–World War II German parliament was profoundly influenced by the Allies, the United States and Britain, although it took a distinctive federal form. Two of these senates (the American and Australian) are popularly elected; two (the German and Canadian) are appointed. In their own ways, three of these federal senates exercise very substantial legislative power: the U.S. and Australian Senates and the German Bundesrat.

Table 1.3 also provides information about the five bicameral parliaments in unitary systems that are included in our purview. In these unitary systems, although public administration may be delegated by the central government to administrative subdivisions, in constitutional principle all political power that government may exercise lies in the hands of the national government. In Italy, Spain, and Poland, senators are directly elected by the people, but their institutional powers vary considerably. The Italian Senate has lawmaking and cabinet confirming power coequal with the lower house, but the senates in Spain and Poland are effectively subordinate to the lower house. The French senators are elected indirectly by electoral colleges, and peers of the realm are, of course, automatically members of the British House of Lords. The upper houses in France and Britain are relatively weak institutions, but their role in legislation is neither negligible nor trivial.

We sought to open up the institutional life of these major upper chambers by asking scholars expert in their own nation’s parliament to analyze its senate. We hoped they would capture the senate’s constitutional importance, its legislative roles, its lawmaking functions, its place in the society and political system, the selection of its members, its internal organizational life, and its linkages to its constituencies. We recognized that the level of knowledge and research would vary considerably among the upper chambers we chose to investigate, and much would be left to discover.

We begin with the U.S. Senate. It is the best-known upper chamber, the most stalwart, and the most extensively studied. Barbara Sinclair dissects the origins and development of the U.S. Senate, adumbrating its role in the congressional vortex as a coequal partner with the House of Representatives. Sinclair paints a portrait of the contemporary Senate she calls
<table>
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<tr>
<th>Upper Chamber</th>
<th>Constitutional System</th>
<th>Size</th>
<th>Term (Years)</th>
<th>Selection</th>
<th>Powers</th>
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<tr>
<td>U.S. Senate</td>
<td>Federal</td>
<td>100</td>
<td>6</td>
<td>Two senators elected in each of the 50 states, by direct popular vote since 1913; before 1913, senators were chosen by state legislatures; one-third are elected every two years.</td>
<td>Lawmaking power, including initiating legislation, coequal with the lower house; confirms presidential appointees; must ratify treaties; may impeach the president for “high crimes and misdemeanors.”</td>
</tr>
<tr>
<td>German Bundesrat</td>
<td>Federal</td>
<td>69</td>
<td>Varies</td>
<td>Appointed by the 16 länder (state) governments; terms are not fixed, but depend on the office holding of the state governments.</td>
<td>Veto over legislation affecting state powers; if a bill fails by a 2/3 vote in the Bundesrat, only a 1/3 vote in the lower house can override the defeat; exercises a voice in the position taken by German ministers in the Council of Ministers of the European Union.</td>
</tr>
<tr>
<td>Australian Senate</td>
<td>Federal</td>
<td>76</td>
<td>6</td>
<td>1/4 of the members are elected every 3 years except for 4 senators representing the federal territories who serve only 3-year terms; each of the 6 states elects 12 senators by proportional representation.</td>
<td>Role in lawmakers coequal with that of the House of Representatives; may not initiate or amend financial bills, but may return any legislation to the lower house requesting amendments; bicameral deadlock precipitates delay, elections, and joint sessions of the two houses.</td>
</tr>
<tr>
<td>Canadian Senate</td>
<td>Federal</td>
<td>104</td>
<td>Life</td>
<td>Appointed by the governor-general on the recommendation of the prime minister.</td>
<td>Primarily revises the details of bills and delays final passage, but has the constitutional power to reject bills passed by the House of Commons; committees may conduct influential investigations.</td>
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French Sénat  Unitary  321  9  Indirectly elected every 3 years; senators chosen by popularly elected electoral colleges in each department, the number of seats based on department population; election by majority in departments with 4 senators or less, by proportional representation in departments with 5 or more senators. Generally subordinate to the National Assembly, but with somewhat greater influence regarding "organic laws" and financial bills; Senate may initiate bills or propose amendments, but final decision rests with the lower house; conducts investigations and engages in oversight, but cannot dismiss the government.

British House of Lords  Unitary  1,067  Life  633 hereditary peers; 408 life peers; 26 clergy. Financial bills must originate in the House of Commons; the Lords cannot alter financial bills once they are approved by the lower house; Lords' amendments to other bills may be rejected by the Commons, and final approval of bills may only be delayed by the House of Lords for one year. The Chamber of Deputies and the Senate are coequal lawmaking bodies; committees may enact legislation (in sede deliberante); the prime minister and cabinet must be confirmed by both houses of Parliament.

Italian Senato  Unitary  326  5  315 directly elected; 9 appointed by the president of the Republic, 2 ex-officio members (former presidents); majority vote for 75% of the seats, proportional representation for 25%. (Continued)
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<th>Upper Chamber</th>
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<th>Size</th>
<th>Term (Years)</th>
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<tr>
<td>Spanish Senado</td>
<td>Unitary</td>
<td>257</td>
<td>4</td>
<td>208 elected directly from 52 multimember constituencies in the provinces, Ceuta, and Melilla; 49 indirectly elected by the legislative assembly of the 7 autonomous communities.</td>
<td>May propose constitutional reforms; may amend or veto bills adopted by the Congress of Deputies (within 2 months for ordinary bills and 20 days for urgent bills), but the final decision is made by the lower house; may engage in oversight of the executive, but the government is responsible only to the lower house.</td>
</tr>
<tr>
<td>Polish Senat</td>
<td>Unitary</td>
<td>100</td>
<td>4</td>
<td>Two senators directly elected from 47 of the 49 provinces; in Warsaw and Katowice, 3 senators are elected; election is by majority vote.</td>
<td>Subordinate to the Sejm; may initiate legislation, propose amendments, or veto bills, but the lower house makes final legislative decisions; Senate must act on ordinary bills within 30 days, and consider budget amendments within 20 days; only the Sejm may vote to override a presidential veto, but only the Senate may approve or block a national referendum.</td>
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“individualist,” the ego-centered, participant, obstructionist body with its uneasy relations with lower house and president in the White House that, she believes, struggles to maintain a capacity to legislate.

The three other federal senates provide the focus for the next three chapters. First, Werner J. Patzelt analyzes the most federal of upper houses, the German Bundesrat. He characterizes in detail the strong linkages between the governments of the German states and the federal chamber of the German Parliament, and unwraps the unusual, if constrained, lawmaking role of that body. Patzelt’s account of the Bundesrat’s role underscores the unusual effects of the overlap of federal and state interests, and competition between governing and opposition political parties, within the German parliamentary system. John Uhr recounts the fascinating upsurge of influence exerted by the Australian Senate, where opposition parties have flourished and where parliamentary committees have become stronger. Uhr’s analysis depicts the curious Australian version of divided government, where a redundant upper chamber may frustrate the legislative program of the party majority in the lower house. Then, C. E. S. Franks anatomizes the workings of the upper house in a very different Commonwealth parliament—the Canadian Senate. Indeed, Franks describes two Canadian senates, the actual body that meets and acts regularly in Ottawa and the senate of the reform literature, the so-called Triple-E Senate (elected, equal, effective).

The remaining chapters capture senatorial segments of parliamentary life in five unitary systems. Jean Mastias’s focus is on the French Sénat, an upper chamber with a rather rocky past and a future that rests on its establishing a permanent identity as an independent parliamentary body. Because senators represent the localities of France in the parliamentary precincts of Paris, the Sénat has achieved a permanence somewhat belied by its limited deliberative and policy-influencing role. Donald Shell has pioneered modern research on the British House of Lords. Here, he locates that chamber within the context of Britain’s constitutional development, and explains that this unashamedly undemocratic body has actually come to play new and constructive roles in the British parliamentary context.

Claudio Lodici and Carlos Flores Juberías analyze the senates of Italy and Spain, respectively. As Lodici explains, the Italian Senate is unusual among parliamentary systems in its coequality with the lower house. Indeed, the important role of the Senate in the Italian political structure
invites comparison to two other senates considered in this book—the senates in the United States and Australia. These senates are not under the aegis of the lower houses of their parliaments, but participate equally in the exercise of legislative power. In its coequal role in confirming prime ministers and cabinets and in enacting legislation, the Italian Senate overshadows its Mediterranean partner, the Spanish Senate, which has been unable to muster a substantial role in post-Franco Spanish politics. Flores provides an illuminating accounting of the parliamentary role of the senate in Spain, and analyzes the lines along which the Spanish Senate must develop if it is to be a major player in Spanish legislative politics.

Last but not least, David M. Olson considers the most recently constructed senatorial edifice of those presented in this book—the Polish Senate. Poland is something of an outlier, a unitary, parliamentary system which nevertheless opted for a two-house parliament. To be sure, its Senate was intended to be a secondary body, subordinate to the Sejm with only revisory powers. As Olson explains, the Polish Senate continues to seek its proper place in the political system.

References


