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Paper #1*

Presiding Officers:
Speakers and Presidents of Legislatures

- ! Westminster Model
- ! U.S. Congress Model
- ! French Bureau Model

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For further information on NDI's governance programs, please contact: Susan R. Benda or Lisa Clarke; The National Democratic Institute for International Affairs; 1717 Massachusetts Avenue, NW; Washington, DC 20036, Telephone: (202) 328-3136; Fax: (202) 939-3166, email: demos@ndi.org

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Introduction

All legislatures empower a presiding officer whose primary responsibility is to supervise and regulate the plenary (floor) debate. The exact title and duties of a "directing authority" vary among legislatures, but research suggests that there are three general models.¹ In the Westminster model, the speaker acts as a nonpartisan official who controls debate. In the U.S. Congress model, the speaker not only controls debate but is the leader of the majority party. In the French Bureau model, the president of the assembly controls debate but is assisted by a presidium or committee of deputies that discharges other administrative tasks.

The nature of the directing authority depends on the history, traditions and evolution of a legislature. In some legislatures, the directing authority is established in the constitution. In other legislatures, the office of president or speaker has evolved and has no explicit legal basis. The U.S. House of Representatives and its constitutionally defined office of the speaker, is the basis for the U.S. Congress model. The French Bureau model, with a constitutionally established legislative head, is based on the National Assembly of France. In the United Kingdom, where parliament is the basis for the Westminster model, the speaker's office has evolved but is not authorized by a constitution or a specific piece of legislation because the United Kingdom does not have a formal written constitution.

Westminster Model

Characteristics

The speaker of the House of Commons has evolved from an appointed office of the crown to the current role in which a member of parliament is chosen to act as a nonpartisan officer of the House. Originally, the monarch appointed the speaker to act as the crown's agent in parliament. In 1641, Speaker Lenthall broke with tradition by informing King Charles I that he was a servant of the House and not of the crown. Further solidifying the break with the crown were the actions of Speaker Richard Onslow who held office for 33 years in the mid 1700s. Onslow set a historic precedent by acting independently of the crown and establishing the impartiality of the speaker. In the late 1800s, disturbances in the Parliament led to according the speaker wide-ranging powers to control debate. Impartiality and the ability to control debate remain characteristic of the speaker's office today.² The speaker as a nonpartisan officer of the House of Commons is not in the line of succession to replace the prime minister in the event of an absence or incapacitation.

Historically, the office of speaker in the United Kingdom was claimed by the majority party in parliament. Breaking with tradition, in 1992 the House of Commons chose a member of the opposition (Labor) party to be speaker. Betty Boothroyd became the

first woman to hold this powerful position in the long history of the House of Commons.³

Today the speaker's duties encompass four distinct roles. The speaker:

- * **Chairs the sessions** of the House of Commons and determines who speaks and for how long;
- * **Regulates the proceedings** by ensuring that the standing orders (rules of procedure) regarding the nature and character of debate are followed;
- * **Acts as the administrative head** by chairing the House of Commons Commission (committee), which employs and controls all permanent staff of the House and directs its five departments (Department of Clerks of the House, Speakers Office, Department of Sergeant-at-Arms, Department of the Library and Department of Official Records); and
- * **Serves as the ceremonial head** of the House, a customary position that communicates the crown's message from the House of Lords to the House of Commons. For example, before the annual sitting of the Commons begins, the speaker moves in a stately procession from his or her official residence in the Palace of Westminster to the Commons. Until recently, the speaker dressed in the traditional robe and powdered wig when presiding over plenary sessions.⁴

The chief characteristics of the Westminster speaker are impartiality and authority. Although elected under a political party label and functioning as an elected Member of Parliament representing the interests of constituents, the speaker is expected to operate with complete impartiality. The speaker's impartiality is protected in several ways.⁵ The speaker must completely withdraw from active involvement in his or her political party. In addition, the speaker is provided a residence within the parliament building, and while members can make appointments to meet with the speaker - the speaker does not freely mix with politicians in public places. Finally, in the U.K., the speakership is always the crowning finale of a political career, not a stepping stone to higher political office. "So the House knows that the Speaker has no self-interest and will not be tempted to favour one side or the other in the hope of future reward or ministerial office."⁶

All speeches in the Commons are addressed to the speaker, and the speaker calls on members to speak. Beyond the maintenance of order, the speaker takes no part in debate and remains impartial at all times. The speaker usually does not vote, but he or she can vote in the event of a tie. However, even in the event of a tie, the speaker will choose one of three options established by precedent to avoid voting. One option is to continue the debate; another option is to abstain from voting on an important bill on the grounds that it lacks a majority for passage. When the vote is on an amendment to a bill, the speaker will vote to keep the bill in its original form.

The decisions made and rules followed by the speaker during the course of the speaker's tenure are precedent setting. The speaker's rulings are significant; the speaker interprets and applies the House of Commons's standing orders and establishes precedents on matters such as whether a member's speech is relevant to the subject under discussion, whether amendments proposed to a draft law conform to the rules and are "in order," and whether certain issues can be properly raised during a Parliamentary Question.⁷ Future speakers will rely on these decisions. According to a senior House of Commons advisor, the speaker's impartiality is fiercely protected because only if the speaker is understood to be absolutely impartial and nonpartisan, will the speaker's decisions on the rules be accepted by the members.⁸

It is impossible for the speaker to preside continuously over the House of Commons while it is in session. Assisting the speaker are three deputy speakers who take turns chairing debates. When chairing House of Commons sessions, the deputy speakers are subject to the same constraints as the speaker (they neither participate in debates nor do they vote) and command the same authority as the speaker (their rulings are also precedent setting). In order to maintain political balance the House of Commons customarily elects one deputy from the same political party as the speaker and two deputies from the other main party in parliament, the official Opposition.

The administrative responsibilities of the speaker are twofold. First the speaker must oversee the maintenance of the parliament's infrastructure. This function includes the management of such tasks as the physical upkeep of the buildings used by Parliament and the production of an accurate record of parliamentary proceedings. In addition, the speaker must select and supervise a staff for the various procedural, administrative and ceremonial functions that the speaker performs. The speaker is assisted by members of the staff who specialize in matters of administration, jurisprudence and maintenance.

Examples

In the Westminster model, the central role of the speaker as head of the parliament is to act as an impartial arbiter of debate. Most of the countries whose parliaments follow the Westminster model have historical links to the United Kingdom.

The **Canadian Parliament** is a direct descendent of the Westminster Parliament. (The monarch of the United Kingdom is the head of state and is represented in Canada by the Governor General.) The Canadian Senate is a parallel institution to the British House of Lords, and the Canadian House of Commons has many similarities with its U.K. counterpart.

The Canadian Speaker of the House is elected by a secret ballot by an internal vote of all House members; all members of the House may stand for election. Until 1982, Canada had no formal written constitution, and the speaker's position evolved without

a constitutional basis. Once selected, the presiding officer of the House decides all questions of procedure and order. According to the rules of procedure, the speaker is required "to be impartial, nonpartisan, and as firm in enforcing the rules against the Prime Minister as against the humblest opposition backbencher."⁹ Before 1985, the speaker of the House was chosen on an alternating basis between English and French speakers because Canada is a bilingual country. In 1985 this practice was altered to allow all members of the House to stand for election as speaker, regardless of language abilities. The speaker of the House does not participate in debate but has a "casting vote," i.e. the ability to break a tie. The speaker does not have the power to convene a session of the House, but the speaker may be authorized to assemble the legislature in times of emergency. The speaker's term of office lasts as long as the parliament's, which legally cannot be more than five years; nothing bars the speaker from being re-elected by the ensuing parliament. Like the speaker of the British House of Commons, the Canadian speaker is not in line to succeed the prime minister in the event of illness or death.

The speaker of the Canadian House of Commons is also its administrative head as chair of the Board of Internal Economy, which manages all aspects of House services. During the last 30 years the Canadian Parliament has become a year-round legislative body, and the administrative duties of the speaker have increased dramatically. A 1985 report on reforming the House of Commons pointed out that housekeeping tasks were precluding the speaker from performing his main function, which is chairing the proceedings of the House of Commons.¹⁰

The Indian Parliament also displays many of the features of the Westminster model. One major difference is that the British monarch is not the head of the Indian state. The Indian president is the head of state; and the Parliament is composed of two houses, the Council of States (Raja Sabha) and the House of the People (Lok Sabha). The Council of States serves a function similar to the Canadian Senate and the British House of Lords, while the House of the People mirrors the Canadian and British popular chambers.

The majority party selects the candidate for speaker, and the members of parliament vote to either approve or reject the majority party's selection. The speaker has a term of service that is coterminous with the parliament. In India the speaker has the possibility of re-election in successive parliaments. The election of the Indian speaker differs from similar selections in the United Kingdom and Canada because in India the members of the majority party always choose the candidate for speaker. The speaker acts impartially and projects a nonpartisan profile, and the speaker's main function is to maintain order and conduct the proceedings of the House. The speaker does not participate in debate but may cast the tie-breaking vote. The speaker also directs the secretariat or parliamentary staff in the administration of Parliament.

Israel's Knesset is also modeled on the Westminster model. Israel is similar to the United Kingdom in that it does not have a formal written constitution, and thus the office of speaker has evolved. Unlike the bicameral parliaments discussed above, the Knesset is a unicameral body headed by a chairperson who is popularly called the speaker. The speaker is elected by a simple show of hands after candidates have been selected by a committee comprising representatives of all the parties. The term of the speaker is coterminous with the Knesset's. Unlike other Westminster speakers, the Israeli speaker is authorized to convene sessions of the legislature. If the president of the country is abroad or unable to perform his or her duties, the speaker assumes the responsibilities of the president. During the Knesset sessions, the speaker maintains the orderly debate of the legislative body. The speaker does not participate in debate and only votes to break a tie or on issues of great importance. The speaker also chairs the Interpretation Committee, which is charged with interpreting the rules and precedents of the chamber when questions arise. The Interpretation Committee is the only Knesset committee of which the speaker is a member. The speaker appoints the secretary general, who hires and manages the staff.

Summary

In the parliaments of the United Kingdom, Canada, India and Israel, the speaker is charged with organizing debate and maintaining order within the chamber. The speaker serves in a nonpartisan manner. The impartial nature of the speaker's role is evidenced by the fact that the speaker's voting rights usually are limited by rule or custom to a casting or tie-breaking vote, although in Israel the speaker may vote on other important issues. In addition, the speaker does not participate in debate during sessions of parliament. Also, the speaker oversees the administrative aspects of parliament. The speaker generally controls all functions of the legislature, from debate to administrative tasks, either directly by chairing committees designed to fulfill this function or indirectly through the secretary general. Only in Israel is the speaker in line to succeed to the presidency - although this is a largely ceremonial post, as the prime minister is the head of government. Finally, the ceremonial role of the speaker of the United Kingdom's House of Commons is not replicated in the Canadian, Indian or Israeli legislatures.

U.S. Congress Model

Characteristics

The role of the speaker in the U.S. House of Representatives has historical roots in the Westminster model, with one major and significant difference. In the United States, the speaker not only controls the debate but is the elected leader of the majority party in the House. The history of the American colonial period, in which the

colonial assemblies often acted in direct opposition to the mandates of the royal governors, produced the unique concept of a speaker as not only the arbiter of debate but as a leader of the opposition against the crown. The establishment of representative government after the Revolutionary War changed the role of the speaker from being the leader of the opposition to the crown to the leader of the majority party or faction in the legislature.¹¹

A reflection of the prestige and power associated with the speaker's office is that it is one of only four offices established in the U.S. Constitution (president, vice president and chief justice of the supreme court are the others). The role of the speaker was somewhat ill-defined during the first decades of the new republic because of the lack of a well defined party system and the unruliness of the House. The speaker's role was greatly enhanced by Speaker Henry Clay in the early 1800s, who exercised strong personal control, and was further consolidated with the emergence of two-party politics after the U.S. Civil War.¹² As the two-party system developed, the U.S. speaker was able to exert party discipline to pass legislation and thereby establish firm control of the House.

The function of the speaker of the U.S. House of Representatives encompasses three distinct roles. The speaker:

- * **Leads the majority party** in the House by organizing it to enact its legislative platform and by protecting against minority attempts to obstruct or oppose the agenda. The speaker also campaigns for other House members in their re-election efforts. The speaker appoints members to the powerful Rules Committee, which sets the legislative agenda of the House;
- * **Chairs** the sittings of the House as chief parliamentary officer to ensure that the rules of procedure (standing orders) are properly followed. The speaker appoints and is assisted by the parliamentarian and sergeant-at-arms; and
- * **Acts as the administrative head** of the House by overseeing House proceedings and appointing managers to administer the Post Office, House Bank, Office of the Clerk and Office of the Doorkeeper.

The chief characteristic of the U.S. Congress model is that the speaker acts as an initiator in the legislative process. In this regard, the speaker chairs the Steering and Policy Committee, which appoints committee members and designates committee chairs. The speaker assigns only loyal members to the Steering and Policy Committee. The speaker also appoints the chair of the Rules Committee, which controls the flow of legislation to the House floor. Paramount among the speaker's powers is the ability to appoint committee chairs because the House empowers committees to control the preliminary stages of the legislative process. The speaker refers bills by subject matter to the committees for consideration. These powers allow the speaker effectively to

control the entire legislative process of the House. Controlling the legislative process substantively accounts for the majority of the speaker's time. Thus, the speaker often appoints junior members of the House to chair plenary sessions. Generally, the speaker only chairs plenary debate on issues of great importance to the party's legislative agenda. The daily running of plenary debate is conducted by members the speaker appoints, who rely on the expertise of the speaker's staff to order debate and adhere to the rules.

As the leader of the majority party, the speaker attempts to enact the party's legislative agenda.* The speaker meets daily with party leadership to organize the party members' votes on bills coming to the floor for that day. In the event the Senate and the presidency are controlled by one party and the House by the other (as happened from 1981 to 1987), the speaker is the most important leader of his or her party. In addition, as the leader of the majority party in the House, the speaker must make every effort to campaign in support of party colleagues competing for other seats.

The election of the speaker occurs strictly along party lines; the candidate for speaker is chosen in a party caucus and then the entire House votes to elect this person. The candidates standing for speaker usually have worked their way up through the party ranks as whips and majority leader, and the real battle for speaker generally occurs in the preceding years when a person who wishes to become speaker obtains other leadership positions such as party whip or majority (or minority) leader.**

The U.S. Constitution provides for a line of succession that places the speaker second after the vice president if the president dies or is incapacitated. The speaker's term of office is two years; there ar

e no limits on how long a speaker may serve and some speakers have held office for more than 10 years. For example, Speaker Sam Rayburn served for 18 years although not consecutively because the Democratic party twice lost power between 1947 and 1961. The longest period of continuous service belongs to Speaker Thomas P. "Tip" O'Neill, who served for 10 years beginning in 1977.

The U.S. speaker is also the primary arbiter of plenary debate and in this role he or she must refrain from partisanship. When the speaker decides the sequence in which members speak, the speaker takes on the role of an impartial actor. To participate in debate the speaker must step down from the chair and be replaced by another representative. However, the speaker rarely makes a floor speech. The speaker is allowed to vote but usually abstains unless there is a tie. The speaker also appoints officials who help with procedural matters, such as interpreting the rules of order, recognizing members during debate, and calling the House to order. These officials are partisan appointees; if another party gains control of the House, they are replaced.

The administrative functions of the speaker include such tasks as assigning office

space, regulating media access to the House of Representatives, and overseeing the House infrastructure. The speaker delegates these duties to officers, such as the clerks and doorkeeper, and to other staff members who direct the House administration on a daily basis.

Example

The distinguishing feature of the U.S. Congress model is that the speaker plays a partisan and quite influential role in the legislative process.

The evolution of the legislature in the Philippines was shaped initially by the country's struggles with colonial powers Spain (from 1565 to 1898) and the United States (from 1901 to 1946). The political party system evolved from a one-party system to a two-party system after independence was secured in 1946. Also in 1946, the Philippines established a Senate and House of Representatives modeled after their U.S. counterparts.

However, in 1972 President Ferdinand Marcos placed the country under martial law, dissolved the Congress and established a unicameral legislature that functioned as a validation mechanism for his policies. The 14-year Marcos dictatorship further interrupted two-party rule by suppressing major political party opposition. The 1986 elections, which inspired the overthrow of Marcos, also launched the revival of a multiparty system. In 1987, a Constitutional Commission re-established a bicameral legislature comprising a Senate and a House of Representatives after the previous year's revolution officially brought an end to the Marcos dictatorship.

The Philippines Constitution establishes the office of president of the Senate. The president of the Senate is second to succeed the president of the Philippines, behind the vice president, in the event of the president's death or incapacitation. A senator's term is six years; however, national elections are held every three years. This means that, as with the U.S. Senate in which terms are staggered, one half of the Philippines Senate is replaced every three years and a new Senate president is selected. The president of the Senate has both procedural and administrative functions. The Senate president presides over Senate sessions, decides points of order, maintains order in the session hall and appoints administrative personnel. The most significant power of the Senate president is the power to constitute special committees and conference committees.¹³ This power enables the Senate president to control the legislative process by assigning to important committees members who agree with the Senate president's agenda.

Summary

The speaker in the U.S. Congress model is not merely an impartial arbiter but also controls the legislative agenda. While the extent of the speaker's control of the legislative process varies in this model, the speaker's power to appoint member

s to committees is a critical component of the speaker's power. Furthermore, in the United States and in the Philippines, the speaker of the House and the president of the Senate occupy constitutionally designated offices that put them in line to succeed the president of the nation.

French Bureau Model

Characteristics

Since 1789, the tumultuous history of French democracy has been characterized by a continuing power struggle between the monarchy, the legislature and the president. After the monarchy was abolished in 1875, France became a republic. However, a power struggle between the president and the legislature, due to a lack of clarity in the division of power, plagued the French democracy until the Algerian crisis of 1958. Under the leadership of General Charles de Gaulle, a new constitution was drafted in response to the inability of the legislature to deal effectively with the Algerian crisis. The new constitution of 1958 signaled the beginning of the Fifth Republic.¹⁴

The Constitution of the Fifth Republic remedied the failures of the previous constitution, which suffered from a weak executive branch that crippled the government in times of crisis. The new constitution guaranteed that supreme political power rested with a popularly elected president; it increased the power of the president and diminished the role of the legislature and the role of political parties. One example of the French executive's vast powers is the president's ability to bypass the legislature entirely by taking an issue directly to the public by means of a national referendum. In such cases French citizens vote on a proposed bill; if a majority of voters support the proposal, the bill becomes law without the legislature having played any role. The premier (prime minister), appointed by the president of the Republic, is the head of the government and appoints ministers to direct specific agencies. However, the premier lacks the broad powers of the presidency.¹⁵

France has a bicameral legislature consisting of a popularly elected National Assembly and a Senate appointed by regional authorities. The Constitution establishes the office of president of the National Assembly who does not succeed the president of the Republic in the event of incapacitation or death. (In that event, the president of the Senate temporarily succeeds the president of the Republic.) The president chooses the premier, but this person must be acceptable to a majority of the Assembly. For example, the majority coalition can oblige the president of the Republic to appoint a premier favorable to the ruling coalition in the Assembly if a majority of candidates elected to the Assembly are capable of forming a coalition that can dissolve the government.¹⁶ The National Assembly president's formal term of office lasts as long as the parliament's, which legally cannot be longer than five years, while the directly-elected president of the Republic's term is fixed at seven years.

Indeed, the president of the Republic and the premier can belong to different political parties; this "cohabitation" has occurred twice since 1980. The National Assembly president is the formal head of the Bureau, which manages the affairs of the Assembly. In short, the Bureau serves the National Assembly in all matters involving points of procedure, administration and management. The Bureau is generally charged with deciding the procedural priority of bills, organizing parliamentary business, arranging legislative services and managing parliamentary relations with the press. Within the Bureau, the offices of vice presidents, *questeurs*, and secretaries each have a different function. The main duty of the six vice presidents is to substitute for the president of the Assembly in the event of an absence. Also, the vice presidents chair special committees. The three *questeurs* are responsible for the financial services of the assembly. The eight secretaries supervise the voting process and manage the taking of minutes.

The Assembly president oversees the legislative functions of the National Assembly by chairing the Presidents Conference. This body is composed of all the leaders of the various parties within the National Assembly. The Presidents Conference appoints members to committees in proportion to party strength in the National Assembly. The Presidents Conference also allocates floor time to the various groups in rough relation to party strength and organizes the legislative agenda of the Assembly.

The duties of the National Assembly president encompass four roles. The National Assembly president:

- * **Chairs** the sittings of the Assembly to ensure that its rules of procedure concerning debate are followed;
- * **Oversees the activities of the Bureau** and supervises the bureau officers;
- * **Chairs the Presidents Conference**, which organizes the legislative agenda; and
- * **Selects** three members of the Constitutional Council.

The chief function of the French directive authority is to chair the sittings of the Assembly. The president of the National Assembly does not initiate legislation as does the speaker in the U.S. House; the president can participate in debate and vote, although this rarely occurs. The president oversees the business of the Assembly, while the actual administrative tasks are left to the members of the bureau.

Another important function of the Assembly president is to appoint three members to serve on the Constitutional Council; the president of the Senate and the president of the Republic appoint the other six members. The Constitutional Council consists of nine members appointed for nine-year terms that are nonrenewable and irrevocable.

The members of the Constitutional Council cannot be members of Parliament or government officials. Established in the constitution, the Constitutional Council is intended to serve as a balance against the strong powers of the executive. The Constitutional Council decides on disputes concerning the constitutionality of laws and the fairness of elections, and its rulings cannot be appealed.¹⁷

Examples

The central feature of the French Bureau Model is that the directing authority heads an elected body that regulates and administers the business of the Parliament.

The **Portuguese Constituent Assembly** was established in 1975, one year after revolution swept an authoritarian government from power. Portugal's hybrid presidential/premier system includes a unicameral legislature that is similar to the French National Assembly in that it is governed by a bureau.

The Constitution establishes the office of the president of the Constituent Assembly. The president presides over the sittings of the Assembly and over the Permanent Committee, which performs the administrative duties of the Constituent Assembly when it is not in session.¹⁸ The Permanent Committee is composed of deputy presidents and other assembly members who represent the parliamentary groups or factions. The most important function of the Permanent Committee is the power to convene the Constituent Assembly. The executive is not constitutionally empowered to convene the Assembly but must instead rely on the committee to perform this function. In addition, the Assembly president chairs the Conference of Chairpersons of Parliamentary Groups. This group sets the timetable for parliamentary action on legislation by scheduling speakers and votes.¹⁹

In Portugal, the office of the Constituent Assembly president is politically contested by the parties. A bargaining process occurs between the parties that form the governing coalition. Each parliamentary faction is accorded representation in the Conference of Chairpersons in accordance with its proportional strength in the legislature according to the rules of procedure. This apportionment by relative strength results in almost complete governmental control over the legislative agenda because the Conference of Chairpersons sets the legislative timetable. The majority of members of the Conference of Chairpersons belong to the government's political party or coalition.

The president's term of office is one year; there is an election at the start of each annual session of the Assembly. The president monitors debate and establishes order by enforcing the rules of procedure. In the event the president wishes to participate in debate or vote, the president must vacate the chair and one of the four vice presidents acts as a substitute chair. The four enforcing secretaries and five assistant secretaries are charged with recording votes, reading the minutes and developing a list of

deputies to speak during plenary debate. The bureau issues rule interpretations, withdraws members' mandates when necessary and generally ensures the smooth functioning of parliament. The president of the Assembly succeeds the president of the Republic in the event of death or incapacitation.²⁰

Summary

In the French Bureau model the president is the head of a collective that controls all aspects of the legislature. In this model, the president oversees various functions of the parliament but does not control them directly. The president directly manages only the plenary debate of the legislature. The president is not the neutral and impartial speaker of the Westminster model because he or she may participate in debate. In the Bureau model, the vice president acts as president if the president chooses to partake in plenary debate. Not as administratively powerful as the speaker in the U.S. Congress or Westminster models, the French Bureau model president does not directly administer the legislature; instead, this time-consuming task is supervised by other members of the bureau.

Conclusion

Each country's legislature is managed by a directing authority. The authority and functions of a directing authority depend on each country's specific political culture, history and party structure. Each of the countries discussed above has been identified with one of the three basic models; at the same time, each national legislature has developed its own derivations of these models. However, the main feature common to all forms of directing authorities is their responsibility to ensure orderly debate. The U.S. Congress model, in which the speaker possesses the power to set the legislative agenda, is at one end of a continuum. On the other end sits the Westminster model, in which the speaker can be selected from the minority party and is chiefly an impartial arbiter of debate. The French Bureau Model, situated between these two, has a president who is not strictly an impartial official, but who also does not control the legislative agenda or the legislature's administration. Regardless of which model is followed, the organization, functions and duties of the directing authority are vital to the legislative process.

End Notes

- ¹ Inter-Parliamentary Union, **Parliaments of the World**, 2d ed (New York: Facts on File Publications, 1986), vol. 1, 313. The term "directing authority" is used by the Inter-Parliamentary Union in its comparative study. The three models of legislatures described were developed by NDI for comparative purposes for this paper.
- ² Andrew Adonis, *Parliament Today* (New York: Manchester University Press, 1993). 82-83.
- ³ David M. Olson, **Democratic Legislative Institutions** (Armonk, New York: M.E. Sharpe, 1994). 41.
- ⁴ Adonis, 85-87.
- ⁵ Danuta Lukasz and Wieslaw Staskiewicz, eds., "**Rules of Procedure and Parliamentary Practice: The Proceedings of the International Conference on Parliamentary Rules of Procedure and Parliamentary Practice, Pultusk, 8-11 May 1994**" (Warsaw, Poland: Sejm Publishing Office 1995). 24. Presentation of Roger Sands, Principal Clerk of Select Committees, House of Commons.
- ⁶ Sands in Lukasz and Staskiewicz. 24.
- ⁷ Sands in Lukasz and Staskiewicz. 23.
- ⁸ Sands in Lukasz and Staskiewicz. Sands explains that the House rules have five sources: traditional practice, standing orders, other orders and resolutions, rulings of the speaker (or deputy speakers) and statutes. The complicated and obscure system of rules are also quite flexible, which places "a great weight of responsibility" on the speaker to apply and interpret them. Sands considers this a distinguishing characteristic of the British parliamentary system. 23 - 24.
- ⁹ Eugene A. Forsey, **How Canadians Govern Themselves** (Ottawa: Minister of Supply and Services, 1991). 36.
- ¹⁰ James A. Magrath, **Report of the Special Committee on Reform of the House of Commons** (Ottawa: Library of Parliament, 1985). James Magrath at the date of publication was an MP and chaired the Special Committee. 1-27.
- ¹¹ Ronald Peters, ed. "Chapter 1" in **The Speaker** (Washington: Congressional Quarterly, 1994). The colonial speaker headed a party or, more often, a faction or group of supporters; in the colonial assemblies the present two-party system did not exist. 1-18.
- ¹² Walter J. Oleszek, **Congressional Procedures and the Policy Process** (Washington: Congressional Quarterly). 30. Clay is considered by congressional scholars to be the first truly influential speaker. He served interrupted terms from

1811 to 1814, 1815 to 1820 and 1823 to 1825.

¹³ Rules of the Senate of the Philippines, 1987. 1-36.

¹⁴ D.L. Hanley, A.P. Kerr, and N.H. Waites, **Contemporary France: Politics and Society since 1945** (Boston: Routledge & Kegan Paul, 1979). 1-35.

¹⁵ Philip E. Converse and Ray Pierce, **Political Representation in France** (Cambridge, Mass.: Harvard University Press, 1986). 17-32.

¹⁶ Converse and Pierce. 532-550.

¹⁷ Ministry of Foreign Affairs, **The Institutions of the Fifth Republic** (Paris: Press, Information and Communication Department, 1995).

¹⁸ Vitor Crespo, **The Assembly of the Republic** (Lisbon: Government Printing Office Impresse4, 1990). 146-163.

¹⁹ Thomas Bruneau and Alex Macleod, **Politics in Contemporary Portugal** (Boulder, Co.: Lynne Rienner Publishers, 1986). 118-125.

²⁰ Bruneau and Macleod. 146-163.