# National Democratic Institute For International Affairs



# Legislative Research Series

Paper #3

# One Chamber or Two? Deciding Between a Unicameral And Bicameral Legislature

Ë	Types of Legislatures
Ë	Bicameral Legislatures
Ë	Unicameral Legislatures
Ë	Patterns of Legislative Structures
Ë	Legislatures in Practice
Ë	Methods of Reconciliation in a Bicameral System
Ë	Cameral Change

#### **INTRODUCTION**

Countries across the world have, at one time or another, wrestled with the question of how to design political institutions that best support an open, stable and prosperous society governed by the rule of law. The results of these debates are generally reflected in a country=s constitution, in which citizens establish their governing institutions. Legislative institutions, in particular, are an area in which countries have a variety of choices. How should legislators be selected? What powers should be attributed to the legislature? These are only some of the issues that require resolution before a legislative body can act. An additional key decision concerns the structure of the legislature itself: should the country adopt one legislative chamber (unicameral) or two (bicameral)?

While the question of cameral selection is not easily resolved, experience over the last century has helped to reveal the strengths and weaknesses of each model. Although historical, cultural and ultimately political factors specific to a particular country will influence this decision, the experience of other countries provides a useful basis on which to determine whether a bicameral or unicameral model better serves the current needs and future goals of that country. This paper identifies some of the central characteristics of bicameral and unicameral legislatures, and offers evidence as to why countries may have chosen one model over the other. To further illustrate the two models, several specific bicameral and unicameral legislative systems are reviewed in some detail.

# **TYPES OF LEGISLATURES**

# **Bicameral Legislatures**

A bicameral legislature is comprised of two chambers, often described as the lower house and the upper house. Usually, the composition of the lower chamber (with such names as the House of Representatives, House of Commons, Chamber of Deputies and Federal Assembly) is based proportionally on population with each elected member representing the same number of citizens. Upper chambers tend to be the smaller of the two legislative bodies. Members of upper houses customarily serve longer terms, but frequently possess less power than their lower chamber counterparts. The upper chamber (sometimes called the Senate, House of Lords or Federal Council) varies considerably in its composition and in the manner in which its members are selected**C**through inheritance, appointment and indirect or direct elections. Some upper chambers reflect regional or state divisions, as in Germany and the United States. Citizens often exhibit greater confidence in those upper chambers where they participate in the selection of the legislators through direct or indirect elections. In direct elections, voters cast their ballots directly for a specific candidate or for the party they wish to see in power. With indirect elections, citizens elect local or provincial governments, who then in turn select the upper house members. Chambers formed by direct or indirect elections, unlike appointed or heredity chambers, are more accountable to the people and, for that reason, are deemed to be more democratic.

Advantages of bicameral legislatures include their capacity to:

C formally represent diverse constituencies (*e.g.*, state, region, ethnicity or class);

- C facilitate a deliberative approach to legislation;
- C hinder the passage of flawed or reckless legislation; and
- C provide enhanced oversight or control of the executive branch.

The authority of the two chambers in bicameral legislatures varies widely among countries. Some countries, such as the United Kingdom, utilize a "weak" form of bicameralism, in which one chamber enjoys superior legislative powers. The degree of predominance differs from system to system. Some upper chambers have the power to delay or review legislation adopted by lower chambers, while the duties of upper chambers in other legislatures are solely consultative. The United States, for example, employs a "strong" form of bicameralism in which both chambers possess equal or offsetting powers, and legislation must be received and approved by both houses.<sup>1</sup>

# **Unicameral Legislatures**

One-chamber, or unicameral legislatures, are most often established in countries structured on a unitary governmental system. Unlike the federal model, where power is distributed between the central government and constituent territorial units, power in the unitary system is concentrated in one central unit. The unitary model is generally found in geographically small countries with homogenous populations of fewer than 10 million inhabitants.

Advantages of unicameral legislatures include:

- C the potential to enact proposed legislation rapidly (since only one body is needed to adopt legislation thereby eliminating the need to reconcile divergent bills);
- C greater accountability (since legislators cannot blame the other chamber if legislation fails to pass, or if citizens=interests are ignored);
- C fewer elected officials for the population to monitor; and
- C reduced costs to the government and taxpayers.

#### **Patterns of Legislative Structures**

The table below illustrates the distribution of unicameral and bicameral legislatures within unitary and federal governmental systems.<sup>2</sup>

DISTRIBUTION OF LEGISLATURES BY GOVERNMENTAL SYSTEM				
	Governmental System			
Structure of Legislature	Unitary	Federal	Total	
Unicameral	54	1	55	
Bicameral	12	16	28	
Total	66	17	83	

Federal systems almost always have bicameral legislatures; in fact, results of a 1986 survey depicted in the chart above found that more than 94 percent of federal systems utilize bicameral legislatures. These countries are usually geographically expansive with large populations, although there are exceptions, such as Switzerland. Diverse elements in these countries often compete for limited government resources and for representation in the political process. A second chamber facilitates more balanced representation among competing groups by providing a political outlet to those outnumbered or underrepresented in the lower chamber. In the United States, for example, large yet sparsely populated states are represented equally in the Senate alongside their more urbanized counterparts. There, agricultural and other rural constituencies can effectively advocate and protect their legislative programs, despite their minority status in the lower house where each member represents a set percentage of the population. Some countries have even adopted strict quotas to guarantee a certain percentage of seats in the upper chamber to historically disadvantaged groups to remedy the effects of past discrimination: for instance, Nepal-s 1990 constitution reserves 5 percent of Senate seats for women. And in Uganda, legislation allocates one seat in each of the 39 regional districts for women (14 percent of the entire parliament).

Compared to countries with federal systems of government, countries with unitary models are usually geographically smaller and less populous, which translates into fewer competing political interests. Moreover, the absence of territories, provinces and state sub-national unitsCalso characteristic of smaller countriesCfurther diminishes the need for a second chamber. Thus, the table on the previous page indicates that the great majority (82 percent) of nations with unitary systems have adopted unicameral legislatures.

As in some bicameral systems, a few unicameral legislatures have instituted quota systems in the single chamber to ensure adequate representation for certain ethnic groups, the disabled, tribal chiefs, women and other traditionally underrepresented segments of society. For example, Slovenia=s 1991 constitution guarantees Hungarian and Italian minorities one seat each in the National Assembly. Nonetheless, some unitary states have opted for a bicameral system to provide additional checks and balances in the legislative process and to guarantee more diverse representation in the legislature. Ultimately, demographic, historical and especially political factors will heavily influence whether a country chooses to establish a unicameral or bicameral system. The following case studies shed some light on how and why countries make their choices.

## LEGISLATURES IN PRACTICE

#### **Bicameral Legislatures**

The following section presents several examples of bicameral legislatures, each with unique reasons for its development. The United Kingdom=s bicameral legislature, for example, reflects seven centuries of evolution. In contrast, the United States and Germany are examples of bicameral legislatures specifically designed to correspond to a federal governmental structure. The cases of Canada, Switzerland, Botswana and Romania provide variations on the bicameral model.

The **United Kingdom**, a country occupying roughly 240,000 square kilometers (93,000 sq. mi.), has a bicameral legislature that evolved despite the absence of a written constitution. The House of Commons, the lower house, convened during the 13th century as a consultative body to the House of Lords, in which membership was based on royal appointment, inheritance and seniority in the Catholic church. By the 1650s, the elected House of Commons was regularly protesting the unchecked power of the upper chamber. Throughout the 1820s and 1830s, parliament's lack of political accountability grew increasingly contentious, and ignited enough public discontent to force a reexamination of British electoral laws. Legislative reforms passed in 1832 redistributed seats through a formula that diminished the influence of aristocracy and clergy in the House of Commons. Gradually, the increased accountability of the popularly elected House of Commons and the continued entrenchment of the aristocracy in the House of Lords prompted yet further legislative reforms, in 1911 and 1949. As a result of these initiatives, the House of Commons emerged as the central lawmaking body, and the House of Lords was obliged to accept a reduced legislative role.<sup>3</sup>

The 651 members of the British House of Commons are elected by universal adult suffrage and serve maximum terms of five years. In a country of 58 million, each member of parliament (MP) represents approximately 89,000 constituents. As in most parliamentary systems, the government's political legitimacy is derived from the popularly elected House, which wields the formidable power to unseat the government by a vote of "no confidence."

The House of Lords comprises members who acquired their positions either through inheritance or through royal appointment to life terms. Although the legislative power of the House of Lords is much diminished today, it still maintains a credible Aplatform@from which it can raise public awareness of policy issues during legislative debates. While the House of Lords possesses the authority to delay passage of a bill for up to one year, it has rarely exercised its power to postpone significant legislation.

The **United States**, with a population of approximately 265 million and an area of more than 9.4 million square kilometers (3.6 million sq. mi.), provides an example of a strong bicameral legislature with two equally powerful chambers. Although both chambers must approve legislation, only the House of Representatives can initiate spending bills, while the Senate alone confirms presidential appointments, presides over presidential impeachment proceedings and

ratifies international treaties.

The federal government of the United States was conceived at the Constitutional Convention, a 1787 meeting of state legislators who opposed the notion of centralized power. However, many also realized the need for a stronger federal system than that established following the war for independence. These competing ideas inspired the formation of a federal government based on the principle of separation of powers among the executive, legislative and judicial branches. The diverse interests of the 13 states also complicated the prospect of establishing a central government. The larger states advocated representation by population in the national legislature, so that the size of a state's population or its tax contribution would constitute the determining factor in the distribution of power. Smaller states, fearing marginalization, demanded equal representation.

Negotiations between these two camps produced the "Connecticut Compromise" of 1787, which called for the establishment of a bicameral national legislature with chambers with similar legislative powers but different constituencies and terms of office. This **A**Compromise@led to the creation of the House of Representatives, based on representation by population, and the Senate, wherein each state would be equally represented regardless of population.

In 1774, one Congressman represented 30,000 constituents; today a congressional district totals more than 600,000 people. In the Senate, two seats are allotted to each state, regardless of population. Initially, senators were appointed by state legislatures. However, in 1913 the 17th amendment to the U.S. Constitution provided for the direct election of senators.

The length of time each member serves represents a major distinction between the two houses. The House of Representatives was intended to function as a body that would be "closer" to citizens and more responsive to their will. Therefore, representatives face a referendum on their performance through elections every two years, and so are more accountable to the voters than their Senate counterparts. The Senate was conceived as a more deliberative body, intended to temper the politically impulsive nature of the House. Senators serve six-year terms that, in theory, allow them to contemplate legislation more carefully without experiencing the constant demands of an upcoming election. The entire House of Representatives runs for re-election simultaneously, making it possible to radically alter the institutions=s political and ideological composition in one election. However, only one-third of the Senate is up for re-election every two years, thus limiting the amount of turnover at any one time and creating a more stable and experienced chamber.<sup>4</sup>

**Germany** occupies a territory of roughly 350,000 square kilometers (138,000 sq. mi.) and has a federal system of government to represent a population of more than 80 million. The federal parliament is bicameral, comprising an upper chamber, the Bundesrat, and a lower chamber, the Bundestag.

The Bundestag is the country=s chief legislative body with 662 members who serve fouryear terms. Its formal powers include the election of the chancellor (head of the executive branch), and the review and adoption of legislation. German voters are accorded two votes when choosing Bundestag members; one vote elects an individual candidate from an electoral district while the second vote is cast for a party. Parties are allotted seats based on a proportional percentage of the total votes. The German Basic Law provides that a political party must attain at least 5 percent of the popular vote to gain a seat in the Bundestag. This provision was intended to inhibit the re-emergence of a fragmented parliament that plagued the pre-World War II Weimar Republic, in which many small parties exercised a disproportionate share of power.<sup>5</sup>

The Bundesrat, which represents the interests of the states or *länder*, holds the power to consider and vote only on issues directly relating to the states, which means that if a bill affecting the states is to become law, the Bundesrat must approve it. Each state's assembly appoints three to six representatives to the Bundesrat, depending on the state='s population. State representatives in the Bundesrat vote *en bloc*. Each state='s delegation appoints one member to represent the state during legislative votes; that representative casts all of the votes for a state. When the Allies established the West German legislature after World War II it was initially anticipated that the Bundesrat would be limited to overseeing about 10 percent of legislation. However, the role of the Bundesrat has grown to include oversight of federal legislation that affects the states. While the Bundesrat has the power to veto the legislation of the Bundesrat vote (*i.e.*, a veto passed by 50 percent of the Bundesrat must be overrideen by 50 percent of the Bundestag.<sup>6</sup>

Like the United States, **Canada** also has a bicameral legislature due in part to its diversity and geographic size (10 million sq. km./3.8 million sq. mi.). The House of Commons possesses most of the political power, having control over tax legislation and the authority to enforce votes of no confidence. Nonetheless, the Senate commands considerable power to investigate social and policy questions as well as to revise legislation. However, the last 60 years has witnessed ongoing grievances against the role of the Senate, as well as numerous attempts to reform its institutional structure.<sup>7</sup>

A unique institution, the Canadian Senate is somewhat of a hybrid of the U. S. Senate and the British House of Lords.<sup>8</sup> Like the U.S. Senate, the Canadian upper house uses a regional apportionment system to theoretically provide equal representation to the provinces. However, the apportionment system was modeled primarily on demographics present in 1867 when the Senate was established. At that time, the Senate comprised 72 senators; 24 senators each for the provinces of Ontario and Quebec, with the remaining 24 distributed among the three maritime provinces. With the formal addition of the Western provinces and Newfoundland in the early 20th century, the Senate expanded to 104 members. But most of the new provinces received only six seats, while two provinces obtained merely one seat each. This apportionment formula severely underrepresents the newer provinces, which while largely unpopulated a century ago, boast some of Canada=s largest and most commercially successful cities. As a result, the Canadian Senate no longer strikes a regional balance that reflects current demographics.

The fact that senators are appointed rather than elected has been another source of controversy. Senators are appointed to lengthy terms by the governor general, on advice from the prime minister. Senators were initially appointed for life, but have been required to retire at the age of 75 since 1965. While originally intended to minimize a senator-s susceptibility to

corruption, this structure has instead led to a situation where Senate seats are treated as political prizes to be handed out by the party in power.<sup>9</sup> As such, the Senate has developed into an elite institution in which little work is expected and a sizable portion of members do not attend sessions.<sup>10</sup> Proposed reforms of the Canadian Senate include limiting terms to 10 years and reallocating seats based on contemporary demographics, or adopting the American model with equal representation for each province.<sup>11</sup>

**Switzerland** provides an exception to the general rule that bicameralism is found in nation-states with large populations. Despite its small size, this country of just more than 6 million and fewer than 41,000 square kilometers (16,000 sq. mi.) is a federal state and one of the oldest confederated systems in the world. Switzerland's official name, the Helvatic Confederation, recalls the association of commercial centers that originally united in the Middle Ages. Modeled after the U.S. Constitution, the Swiss Constitution of 1848 was amended in 1874 to strengthen the role of the federal government in fiscal and military affairs. Switzerland-s multi-ethnic composition, which officially recognizes four national languages (French, German, Italian and Rhaeto-Romanish), contributes to a highly decentralized confederation in which the cantons (states) control all matters not expressly delegated by the constitution to the federal government.<sup>12</sup>

The Swiss legislature consists of two houses. The 200-member National Council, or lower house, is directly elected every four years. The 46-seat Council of States, or upper house, includes two members appointed from each of the 20 cantons and one member appointed from each of the six half-cantons.

The Swiss system relies heavily on direct democracy or referenda. This unusual feature, which dates back more than 700 years, calls upon Swiss voters to decide directly whether specific laws should be enacted at the national and canton levels. The Swiss vote two to four times a year on issues of national importance. Fifty thousand citizens can compel a referendum on a piece of legislation, while 100,000 are required to initiate a referendum on a constitutional issue.<sup>13</sup>

Another variation on the bicameral model can be found in **Botswana**, which is geographically large but sparsely populated. Its area covers approximately 225,000 square kilometers (550,000 sq. mi.), but contains only 1.3 million inhabitants. One of few democratic systems in Africa, Botswana utilizes a **A**weak@bicameral legislature comprising the House of Chiefs and the National Assembly.

Forty members of the 46-seat National Assembly are directly elected. The President of the country (who is elected by the National Assembly) receives a seat and may fill four other seats by presidential appointment. One seat is reserved for the Speaker of the Assembly, who is elected by the Assembly and need not be a member of parliament.<sup>14</sup>

The House of Chiefs is composed of 15 members; eight of these members represent the eight largest traditional tribes and four of them are elected at-large from the smaller tribes; these 12 representatives elect the three remaining members. The House of Chiefs plays a limited role in the legislature. In contrast, the National Assembly is responsible for most legislative concerns, but must consult the House of Chiefs on any proposed changes to the constitution, or on tribal

matters such as customary laws (marriage rites, etc.) or tribal property.<sup>15</sup>

**Romania** employs a bicameral legislature to serve its population of 23 million occupying roughly 240,000 square kilometers (92,000 sq. mi.). While Romania inherited a unicameral system from the communist era, the fear of an authoritarian revival led to the creation of a bicameral legislature. Serious debate, however, raged on this issue. Those who favored a unicameral legislature underscored its structural efficiency. However, some of the unicameral proponents were not considered true **A**democrats@ by the public. As a result, their advocacy for unicameralism inadvertently created a backlash of support for a bicameral legislature would more effectively counter executive branch excesses. While recognizing that two houses would take longer to adopt legislation, supporters of bicameralism believed that any inefficiencies would be offset by an increase in the quality of legislation and the capacity to more effectively guard against the concentration of power.<sup>17</sup>

The supporters of bicameralism prevailed, and on May 20, 1990 Romanian voters elected a 143-member Senate and an equally powerful 328-member Chamber of Deputies. Both houses serve four-year terms through proportional representation. Some critics assert that the similarities in the power of the two houses and the nature of their representation produced legislative stagnation. They note that if political deadlock and economic hardship continue, the already skeptical public will lose faith in the new legislature.<sup>18</sup> Other critics charge that the Senate is unnecessary, since its composition and legislative capacity are overly similar to the Chamber of Deputies.<sup>19</sup>

### **Unicameral Legislatures**

In accord with the table presented on page 3, the countries presented in this section tend to occupy smaller geographic areas and possess smaller populations as compared to their bicameral counterparts. Importantly, these democracies challenge previous perceptions that associated unicameral legislatures with autocratic regimes. Indeed, a sizable number of truly democratic countries today utilize unicameral legislatures. Also of note are two countries that have only recently made the transition from authoritarian systems to democracy.

**Costa Rica** has a tradition of free, democratic elections dating to 1889. At that time, a unicameral legislature had already been in place for more than 40 years, and that tradition has continued through the country=s most recent constitution adopted in 1949. Because of a previous history of authoritarianism, however, Costa Rica has instituted many precautions aimed at curtailing the concentration of power. Political power is diffused by a constitutional provision that prohibits both the president and members of the Legislative Assembly from seeking reelection to consecutive terms. This stipulation has proven effective in preventing one party from dominating the Assembly, a tendency that is sometimes attributed to unicameral legislatures.<sup>20</sup>

Much like Costa Rica, **Portugal** has a unicameral legislative system strengthened by constitutional amendments that limit the concentration of power, especially in the hands of the

military. For roughly 40 years, Portuguese politics were dominated by a string of civilian dictators who used autocratic methods to gain and maintain power. The military remained a direct guiding force in Portuguese politics until 1982 when a series of constitutional reforms were adopted that formally excluded direct military participation in the government.<sup>21</sup> Additional constitutional reforms in 1989 and 1992 designated the legislature as the sole legitimate body of political representation. The Portuguese legislature, the Assembly of the Republic, has 230 members serving four-year terms. Its members are elected from 22 electoral constituencies, using proportional representation taken from party lists.

**Hungary**, with a long history of democratically elected parliaments, is often cited as a legislative model for emerging countries in Eastern Europe. Following the end of communism in 1989, Hungary returned to its democratic roots and adopted a new constitution based upon a unicameral legislature. Although it is composed of just one chamber, the National Assembly employs two methods for gaining seats: 45 percent (176) of members are elected in separate constituencies, while the other 210 are chosen from party lists. Each voter casts two votes; one for a candidate in his or her district and the other for a party. In reality, almost all candidates campaign for both seats, so that if they lose in an individual constituency, they may still gain a seat through the party lists.<sup>22</sup>

# Methods of Reconciliation in a Bicameral System

#### **Cameral Change**

Changing the number of chambers invariably requires modifying a country's constitution. Although the complexities involved differ among countries, there is often strong resistance to changing the status quo, in large part because politicians are often opposed to relinquishing their share of power. Protracted debate inevitably accompanies proposals to alter the institutional structure of legislatures, and even then, the expected outcome is not guaranteed.

Still, a number of examples of cameral change exist. **Iceland** switched its bicameral legislature to a unicameral legislature in 1991.<sup>23</sup> In 1953, **Denmark** changed to a bicameral system following the enactment of a broad range of constitutional reforms.<sup>24</sup> And in 1950, after 96 years with a bicameral legislature, **New Zealand** converted to a unicameral system, reflecting a public consensus that the royally-appointed upper house was both politically and legislatively irrelevant.<sup>25</sup>

**Peru** provides an example of the various political obstacles to cameral change. In a 1993 referendum, Peru adopted a new constitution in which the Senate was eliminated. However, the new constitution passed with a bare 52 percent of the vote. Many Peruvian citizens were wary of adopting a unicameral system, for two reasons. First, the public was long accustomed to a bicameral legislature. Second, a sizable portion of citizens were afraid that President Fujimoris support of unicameralism reflected an attempt to concentrate political power in one chamber. Rural voters were particularly fearful of a unicameral system, because historically their interests had been better served by the Senate. After contentious debate, the new constitution was adopted

by a thin margin, a result due primarily to voters in Peru-s large urban centers.<sup>26</sup>

**Sweden-s** conversion to a unicameral legislature demonstrates the formidable nature of institutional inertia. In 1867, Sweden moved from a four-chamber legislature to a bicameral version based upon the U.S. and Norwegian models. The two chambers differed in the constituencies their members served, the manner in which members were elected and their terms of office. However, the chambers exercised equal legislative power, in a manner similar to the U.S. House and Senate. When conflicts emerged between the two houses, they steadily grew into two distinct ideological bodies, with the upper house controlled by a conservative majority and the lower house dominated by a liberal majority. The ideological divide provoked a legislative stalemate and, eventually, political stagnation. Although attempts to reform the legislature began in 1945, the process took more than 20 years. Not until 1967, after more than a century of bicameralism, did the Swedish legislature vote to become a unicameral body.<sup>27</sup>

**Morocco** took a somewhat unusual route to cameral change. The citizens of Morocco voted in 1996 to add another chamber, the House of Councillors, to its originally unicameral legislature. The composition of this new chamber is quite unlike that of the already existing House of Representatives, whose 325 members are directly elected from single-member districts. In contrast, members of the House of Councillors are drawn from two forms of indirect elections: local and regional electoral colleges elect 162 of the 270 members, while representatives of industry, agriculture and trade unions appoint members to the other 108 seats. The two houses possess similar powers in their authority to initiate laws and propose amendments. However, the constitution confers preeminence to the House of Representatives, according it sole power to vote on cabinet programs, as well as increased influence over the composition of cabinet.<sup>28</sup>

The results of Morocco-s switch to a bicameral legislature appear to be improving the goal of increased representation.<sup>29</sup> According to one expert, **A**the upper house is designed to represent different constituencies than the lower house in an attempt to keep as many political actors within the scope of formal politics as possible, thereby bolstering the democratization process. $e^{30}$  While the future impact of the House of Councillors remains uncertain, the Moroccan example provides a unique case for other transition countries, which like Morocco often face the perils of instability and underrepresentation during the democratization processes.

The successful political efforts of women and traditional chiefs in **Malawi** were largely responsible for the addition of a new parliamentary chamber in 1994. While not yet formally operational in 1998, this new Senate will comprise 80 members, indirectly elected by a majority of the 177-member National Assembly. According to Article 68 of the constitution, 24 Senators will be elected by local councils, 24 Senators will be chiefs, and another 32 will be drawn from the following groups: interest groups (including women, health and disabled groups), trade unions, representatives of the farming, business sectors and religious faiths, and other persons recognized for their contributions to Malawi society. The Senate=s role will be limited in relation to the National Assembly; it will posses the power only to confirm bills or remit bills back to the Assembly for reconsideration.

#### CONCLUSION

Significant variation exists among countries with respect to the structure of their legislatures. While smaller, unitary countries typically use unicameral legislatures, and larger, federalist countries usually employ a bicameral model, these presumptions are not set in stone. Each nation possesses its own unique motivations to adopt either a unicameral or bicameral model. These reasons are many, and derive from historical, cultural, or demographic characteristics that may apply solely to that country. Existing institutional and political factors such as electoral methods and party systems have a significant influence this process as well. Moreover, political personalities play a vital role in shaping legislative design. Finally, power, protection of interests, and compromise will undoubtedly contribute to cameral design.

This document was prepared with the pro bono assistance of Richard Verma, Steptoe and Johnson associate; and NDI staff members Susan Benda, Patrick Henry and John Whaley. NDI would like to thank Lawrence D. Longley and David. M. Olson for their expert assistance and thoughtful suggestions.

#### **End Notes**

4. Barbara Hinckley and Edward Muir, A Elections to the U.S. Senate,@in Joel Silby, ed., *Encyclopedia of the American Legislative System* (New York: Charles Scribner= Sons, 1994).

5. Helmut Nagelschmitz, ed., *Procedures, Programmes, Profiles: A Special Election Report* (Bonn: Inter Nationes, 1994).

6. Bundesrat Public Relations Office, *The German Bundesrat*, 2d ed. (Bonn: Roco-Druck).

7. C.E.S. Franks, The Parliament of Canada (Toronto, University of Toronto Press, 1987), p. 186.

8. For additional information, see Representation and Policy Formation in Federal Systems, David M. Olson &

C.E.S. Franks, eds. (Berkeley: Institute of Governmental Studies Press, University of California, 1993).

9. C.E.S. Franks, The Parliament of Canada, pp. 187-188.

10. Howard Schneider, **A**Canada Reassesses Senate=s Purpose, Composition,@*Washington Post*, December 14, 1997, p. A22.

11. *Ibid*.

12. ASwitzerland,@in Worldmark Encyclopedia of Nations, 1995 ed., vol. 5.

13. Between the end of World War II and 1993, the Swiss held 414 referenda on national issues. By way of comparison, Australia is second in the use of referenda, having conducted only 44 since the end of World War II. Kris W. Kobach, ASwitzerland,@in, Referendums around the World, ed. David Butler and Austin Ranney (Washington, DC: The AEI Press, 1994), pp. 98-140.

14. Richard Dale, ABotswana,@in George Thomas Kurian, ed., *World Encyclopedia of Parliaments and Legislatures*, 2 vols. (Washington, DC: Congressional Quarterly, 1998) I, p. 89.

15. Ibid., p. 90.

16. Elena Stefoi, "Romanian Parliamentary Rules," presented at the Conference on the Constitution and Parliament (Chicago: University of Chicago, Center for the Study of Constitutionalism in Eastern Europe, 1994). 17. *Ibid.*, pp. 5-15.

18. *Ibid.*, pp. 5-15.

19. Brett R. Ludwikowski, ARomania,@in Kurian, ed., World Encyclopedia of Parliaments and Legislatures, II, p. 562.

20. Allen Rosenbaum and Alejandro Rodriguez, ACosta Rica,@ in Kurian, ed., World Encyclopedia of Parliaments and Legislatures,., I, p. 182.

21. Thomas Bruneau and Alex Macleod, *Politics in Contemporary Portugal* (Boulder, CO: Lynne Rienner Publishers, 1986), pp. 1-20.

22. Atilla Agh, AHungary,@in Kurian, ed., World Encyclopedia of Parliaments and Legislatures, I, p. 308.

23. Edward Schneier, Alceland, @in Kurian, ed., World Encyclopedia of Parliaments and Legislatures, I, p. 314.

24. David Arter, AOne Ting Too Many: The Shift to Unicameralism in Denmark,@in Lawrence Longley and David Olson, eds., *Two into One: The Politics and Processes of National Legislative Cameral Change* (Boulder, CO: Westview Press, 1991), pp. 77-142.

25. Keith Jackson, **A**The Abolition of the New Zealand Upper House of Parliament,@in Longley and Olson, *Two into One*, pp. 43-76.

26. William W. Culver, APeru,@in Kurian, ed., World Encyclopedia of Parliaments and Legislatures, II, p. 537-538.

27. Björn von Sydow, ASweden-s Road to a Unicameral Parliament,@in Longley and Olson, *Two into One*, pp. 143-201.

28. 1998 Inter-Parliamentary Union at: http://www.ipu.org

<sup>1.</sup> Arend Lijphart, *Democracies: Patterns of Majoritarian and Consensus Government in Twenty-one Countries* (New Haven, CN: Yale University Press, 1984), pp. 99-101; George Tsebelis and Jeannette Money, *Bicameralism* (Cambridge, UK: Cambridge University Press, 1997), p. 2.

<sup>2.</sup> Chart taken from Inter-Parliamentary Union, *Parliaments of the World: A Comparative Reference Compendium*, 2d. ed. (New York: Facts on File Publications, 1986), I, p. 14.

<sup>3.</sup> John Garett, Westminster: Does Parliament Work? (London: Victor Gollancz, 1992), pp. 162-163.

29. James Ketterer, AMorocco-s New Bicameral Parliament: Democratic Obstacle or Catalyst?@paper presented at Third Workshop of Parliamentary Scholars and Parliamentarians, Wroxton College, Oxfordshire, UK, 8-9 August 1998, pp. 2, 10-11. p. 18.

<sup>30.</sup> Ibid., p. 8.