

Is France becoming America?

William Safran

The United States has served for many American political scientists as a model of the modern pluralistic democracy.¹ Its institutional mix was seen as providing for the best available diffusion of power;² its patterns of relationship between the public and the private domains, and between state and society, were taken as the very model of pluralism, and the political orientations and behaviour of its citizens were viewed as most reflective of civic culture. To the extent that France was seen as diverging from the American model, it was considered unstable; its governmental machinery was "blocked";³ its political parties, and the people who voted for them, were seen as informed by absolute-value rationalities; and the behaviour of citizenry at large was regarded as reflecting a lack of civic-mindedness.

The positing of the United States as a model may have been intended for the purpose of creating a certain intellectual order and, of determining the extent of a polity's "modernity", adaptiveness and general success. Often, in order to escape the charge of unmitigated ethnocentrism, one avoids talking about the United States *as such* as the prototype; rather, one speaks of an "Anglo-American" political culture or a "postindustrial" system that happens to bear a striking resemblance to the United States.

The lack of conformity of France to that more advanced kind of system has led some American social scientists to view French political culture as dysfunctional for stable democracy.⁴ An American sociologist spelled these dysfunctions out in detail: French society, he argued, was "delinquent"; its

members demanding benefits from it; and its ruling elite and its administrative system were so rigid that citizens became estranged from them and periodically resorted to violence against them.⁵

Man as such

To some extent, the French have themselves to blame for their country's negative images. Whereas American social scientists have tended to more or less conscious self-congratulation, their French counterparts have been excessively self-critical. They have spoken of an unfulfilled Revolution, a "blocked society", and the persistence of social injustice, and held out a vision of an idealised universal state. At the same time, they have insisted on French exceptionalism, to which some had a prescriptive and others a descriptive approach. For many years, the French prided themselves on the uniqueness of their country's cultural patrimony, the orderly classicism of its landscaping, architecture and even language, and the originality of its political ideologies and institutions. In short, they tended to equate themselves with "man as such" and their culture as incarnating civilisation itself, and therefore thought it unnecessary, and probably harmful, to take other cultures and patterns seriously.⁶ This was reflected in France's long-time refusal to recognise the school diplomas of other countries; its battle against the corruption of the French language by outside influences; its *mission civilisatrice* (of which the promotion of *francophonie* has been a manifestation); an almost narcissistic celebration of the French Revolution, and the Jacobin conviction that the French *état-nation* was the prototype of a global political system based on reason and liberty.

While there are still many French men and women who wish to preserve the country's *differences*, there are others who regard them as detrimental and who want their country to become like other countries, and especially like the United States. One writer has gone so far as to assert that "for nearly three centuries, [the French have been] idealising Anglo-Saxon society, beginning with Montesquieu".⁷

After a brief period immediately at the end of World War II, when French citizens expressed their gratitude to the Americans for their efforts to liberate France and to help them revive economically, that idealisation was replaced by a systematic demonisation of the United States. Under the influence of Marxism and, some years later, Gaullism, the United States came to be widely

regarded as reactionary, uncultured, racist and imperialistic. By the early 1980's, the image of the United States was changing again. Increasingly, industrialists and businessmen, impressed by statistics of low unemployment in that country, were painting a picture of an optimistic, prosperous, and dynamic America; and political leaders and intellectuals fell in line with their perception of a country with forward-looking schools, a strongly supported scientific elite, flourishing arts, and a democratic and open society.

French critics of their own country have juxtaposed French social and political realities against what France should be or could become. For many of them, the United States has approximated the ideal better than other countries. They have a tendency to make allowances for, if not to ignore, the warts of America: overconsumption, environmental pollution, urban crime, racism, decaying inner cities, the large national debt, the growing gap between rich and poor and an increasingly Social-Darwinist ethos within private businesses, government agencies and universities.

One of the most prominent of the early post-World War II pro-Americans was Raymond Aron, whose opposition to ideological dogmatism, especially its Marxist variety, led him to appreciate American pragmatism. He regarded the United States as "an empirical success" that was achieved despite—and perhaps even because of—the absence of an elegant and dominant *Weltanschauung*. As he put it, "France exalts her intellectuals, who rejected and despise her; America makes no concession to hers, who nevertheless adore her".⁸

Michel Crozier echoed these sentiments. In *The Bureaucratic Phenomenon*, he discusses the "fear of face-to-face relations" that afflicts French people, a fear that, he argues, does not exist in the United States because social intercourse is less formalised and tends to be promoted by voluntary organisations.⁹ Moreover, whereas in France, a person's worth tends to be determined by social status based on ascription, in the United States, by contrast, it is based on achievement.¹⁰

The admiration of another writer, Jean-Jacques Servan-Schreiber, of things American was a purely practical one. In his bestseller, *The American Challenge*,¹¹ he glorifies marketing techniques, economies of scale and technocratic management; advocates an increase in expenditures for research and development by both governmental agencies and private businesses, and

calls for a “federalist” approach to European integration—not because all these aspects of American civilisation were *ipso facto* admirable, but because France needed to adopt them in order to ensure its growth and prosperity.

A recent book¹² contains a list of traits of French culture that are contributing causes of one “blockage” of French society: the instinct for private property. This instinct is complemented in France—more convincingly than in the United States—by the acceptance of a public domain and the production of public products.

Other traits are an orientation toward the small world (localism and individualism), an immobility born of fear of contact with outsiders and an “untouchable” history.

Both French localism and inward orientations and the immobility born of fear of outsiders, however, are rapidly giving way to an outward-looking dynamism in the context of the European Community, in contrast to an often hazy view of the world prevailing in the United States. And the French people’s view of their own past, much like the Americans’ view of theirs, is becoming less sacrosanct in the face of the changing texture of each of the two societies.

Many of these French views of the United States have been confounded by American realities in that country: the ascriptive aspects of American elite recruitment and the persistence of unsolved social and economic problems. All this was probably known from the outset, but a romanticising of things American has probably been necessary for those Frenchman who could not accept the Soviet system as a model, and therefore had to look for another one. French political scientists may not be quite so romantic; yet owing to the overwhelming influence of American political science, growing numbers of them, when dealing with their own country, have been using American analytic categories and American definitions of political terms.¹³

Many of the positive views of the United States embraced by “liberal” critics of France have, more recently, been taken up by Socialists. These have included Prime Minister Michel Rocard, who called for an “unlocking” (*déverrouillage*) of French society. In a recent book he refers repeatedly to the United States and suggests that its patterns and policies be followed in several

areas. Thus, he has tended to view culture in a less interventionist way than many veteran Socialist politicians. He argues that "It is obviously not up to the state to decide what is cultural and what is not... but to guarantee the conditions of a free cultural expression."¹⁴ In defending the capital gains tax, Rocard refers with approval to the United States;¹⁵ and that country is also seen as a model for the financing of political parties,¹⁶ "sunset laws"¹⁷ and government funding for scientific research and technology.¹⁸

Constitutional currents

It is widely agreed that France and the United States have shared constitutional norms and political values. Among these have been the conviction that a Constitution does not, or should not, evolve organically but rather is the product of deliberate choice and the expression of a "social contract"; the occasional ahistoricism of political discourse;¹⁹ the principle of popular sovereignty, that is, the axiom that governmental powers are derived from the people; a belief in the principle of equal rights for all, and a growing commitment to equal representation and to a public and secular educational system.

The obvious success of the US system of government served to perpetuate what has been called a "mythology of the presidential regime".²⁰ Although based on an incomplete understanding of that regime, its idealisation was recurrent, so that it was regarded by most republican constituent bodies as an implicit point of reference.

However, the peculiar traditions of France—among them monarchism, Catholicism, organicism, etatism and centralism—were too deeply rooted for American patterns to be easily adopted. French constitutions and institutional arrangements had both to *embody* and to *attempt to counter* these traditions. Therefore, it is not surprising that the Third Republic, as it evolved, represented a clear departure from the US model. Because of these differences in historical development, Michel Debré and other drafters of the Fifth Republic constitution did not believe the US model to be applicable to France.

In promoting the new constitution, de Gaulle himself specifically rejected the US presidential model, because he feared that the French would be tempted by their traditional distrust of strong government to destroy the decision-making

power of the executive by means of a “coordinate” legislature. Nevertheless, there are those who insist that the founders of the Fifth Republic must have been inspired by the American Founders, whose ideas were said to have been imported into France by way of Tocqueville’s writing.²¹

The Fifth Republic is a presidential system, and the position of the president of the Republic provided for by its constitution approximates that of the US President more closely than any French republican system since 1848. Yet the designers of the Fifth Republic constitution did not adopt the formal separation of powers of the US system, fearing that such a feature might impede effective decision-making or even produce deadlock.

De Gaulle rested his opposition to a fully presidential system at a press conference in January 1964.²² He and his followers were particularly reluctant to fuse the offices of head of state and head of government. That reluctance was probably motivated by several reasons, including an unwillingness to convey the impression that France was imitating the United States.

Recent developments suggest a growing convergence with the United States in French constitutional interpretation and usage. This can be clearly seen in the evolution of the Constitutional Council, particularly since the early 1970’s. Its increasingly active role has been such as to transform that body into a nearly independent decision-maker—in effect, a third branch of government. Indeed, the decisions of that Council in the domain of civil liberties have served to “Americanise” the Fifth Republic constitution in the sense of “inserting” into that document a bill of rights that the constitution makers of 1958 had failed to include.

In his attempt to reform the judiciary and to democratise the penal code, Robert Badinter, the Socialist minister of justice from 1981 to 1986 and currently the president of the Constitutional Council, acknowledged that France might profitably lean on the US model. This applied in particular to certain aspects of due process. France does not have a constitutionally anchored writ of *habeas corpus*; nevertheless, it has been moving in an American direction by gradual legislative means.

Finally, the Gaullists were clearly inspired by examples in Florida and elsewhere in the United States when (between 1986 and 1988) they briefly toyed with the idea of establishing privately run prisons.

It is in the area of institutional development that "American" patterns can be most clearly discerned. For many years, reformers focused their critiques on the overcentralised nature of French government that had impeded the developments of "grassroots" democracy. The Fifth Republic constitution seemed to aggravate the situation by concentrating decision-making power in a "unicephalic" executive. However, since the presidency of Giscard d'Estaing, there has been a gradual diffusion of power both vertically and horizontally. The decentralisation measures enacted between 1981 and 1983 introduced considerable subnational autonomy. The power of the prefect was reduced, and that of the general council and its elected President increased; at the same time, the authority of the municipal council (including the power to collect taxes) was extended—in order to "make more effective the territorial distribution of policymaking tasks..."²³

These measures fell far short of American federalism because the national government retained its basic jurisdictional supremacy (*tutelle*), but they may have introduced a momentum that would bring the French pattern even closer to the American one.

Institutional and pattern adaptations

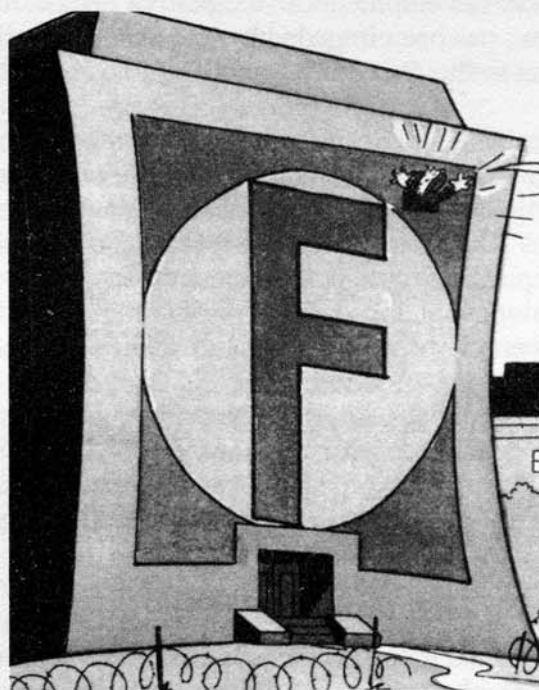
The greatest changes have occurred in the horizontal balance of power. Since the mid-1970's, the role of the parliament has been enlarged and its staff has expanded, though it is not likely to come close to the bloated bureaucracy of the US Congress. The "rehabilitation" of both chambers has been reflected in their growing ability to amend government bills.²⁴

The limits on the concentration of power that the American Founders hoped to achieve by means of a formally articulated separation of powers are being achieved in France by means of both transinstitutional and intra-institutional control patterns that have evolved alongside judicial review and decentralisation. Both the "represidentialisation" of the French political system envisaged by the founders of the Fifth Republic and the gradual "reparliamentarisation" discussed above are reminiscent of periodic attempts in the United States to adjust the balance of power between the executive and the legislature. Just as the US constitution has made possible various types of relationships and power systems—strong and even "imperial presidents; domineering Congresses; consensus-seeking chief executives, and a coexistence of charismatic presidents and assertive Congresses, each with its

own constituency—so the Fifth Republic constitution has proved adaptable enough to permit a shift from de Gaulle's Olympian dominance to a partially revived parliament, a sharing of power between the Assembly and the president (from 1986 to 1988) and (since 1988) a system in which the president, prime minister, and parliament each hold valuable cards, but not enough of them.

During the "cohabitation" period, Prime Minister Jacques Chirac possessed more power than any of his predecessor and, in fact, dominated the domestic policy arena; but he could not fully control parliament, and had to contend with a president who had not been completely reduced to the status of a British monarch and whose standing in the public-opinion polls progressively improved at the expense of that of the Prime Minister.

Although President Mitterrand has, theoretically, retrieved much of his former power as a result of his reelection by a resounding vote, the French system has not been fully "represidentialised". Mitterrand is likely to exercise his power



Scrooge McDuck worrying for his French Francs

with restraint: first, because he has been chastened by the "cohabitation" experience, and second, because he found that the presidential coattails have frayed in France, as they have in the United States. The French electorate, in refusing to give him a Socialist parliamentary majority, seems to have opted for a continued power sharing between the executive and the legislature. French voters behaved much like American voters in 1988, who, though giving George Bush a landslide victory, refused to provide him with a Republican Congressional majority.

In this circumstances, parliament has become more assertive; but its composition is such that there is an internal balance of power. Moreover, whereas years ago, most of the major parliamentary parties voted *en bloc*, today party discipline shows signs of weakening. Since there is neither a reliable government majority nor a united opposition, the prime minister, must be prepared to rebuild *ad hoc* legislative majorities for each policy issue. It is a situation that could make for a gradual "Americanisation" of the behaviour of French deputies. However, the Americanisation of the French parliament has had certain limits. The development of an assertive Senate, and therefore of US type of bicameralism, has been impeded by its constitutionally defined inferiority in relation to the Assembly.²⁵

Both the French president and prime minister have reacted to that fluid situation in much the same way as the US president: on the one hand by reaffirming the legitimate role of the opposition, and on the other, by attempting to bypass parliament. There has been a proliferation, especially since 1981, of extraparlimentary committees of experts (*comités des sages*), whose tasks are analogous to those of US presidential commissions: they investigate national problems and recommend solutions to the legislature.

The disunity within the legislature gives the prime minister a measure of control, or at least a certain security of tenure. But as Premier Rocard has been finding out, the control of the government does not necessarily imply the ability to govern, in the sense that governing means effecting drastic changes in domestic policies.

Moreover, Rocard's government, half of whose members are not Socialists, is itself a medley of personal ambitions and differences of opinion. Under these circumstances, the president is better able to interfere in the policy process than he could during the "cohabitation" period.

The diffusion of executive power has contributed to a "polyarchic" pattern of decision making involving a variety of national and local politicians and organised private interests. With the increased legitimization of interest groups, US-style lobbying has been more in evidence, policy-making has become more incrementalist in nature and policy outcomes have increasingly depended on collective contracts and unofficial deals between private interests and the public authorities, such that "pluralism" has come to be a more accurate descriptive term for France than "corporatism".

Ideological shuffle

The pluralisation of decision-making patterns has been paralleled by changes in the party system that have transformed it in an "American" direction. The class-based appeals and ideological nuances that had once distinguished the various parties, or "political chapels", from one another²⁶ have given way to US-type "catchall parties", (*partis des électeurs*) that direct their appeals to as many segments of the electorate as possible in order to get a majority. In so doing, they have muted their ideological orientations. The Socialist party has over the years evolved into a moderately progressive party whose outlook bears a striking resemblance to the liberal wing of the Democratic party in the United States.

The differences between the Gaullist and Giscardist parties that once related to the conflict between mystical nationalism and liberal pluralism have dissolved into personal rivalries. The Gaullist party is divided among *étatiste* hardliners and "neoliberals" and led by Chirac; and the Giscardist *Union pour la Démocratie Française* has been in danger of losing its unity, if not its *raison d'être* as a result of the rivalries of its leaders and the decision of the *Centre des Démocrates Sociaux* to form a separate parliamentary party. The parties of the "Republican" right are now barrellily distinguishable from one another and, for the matter, from the American Republican party.²⁷ The *Club de l'Horloge*, the think tank of the conservative Republican right stresses its ideological affinity to the Washington-based Heritage Foundation.²⁸

Even the term "liberal" has gradually been acquiring an "American" connotation. Whereas from the Liberation to the mid-1970's—during the heyday of Marxist domination of the intellectual establishment and of the public discourse—liberalism had been used in the strictly "Manchesterian" economic sense (except in the case of isolated thinkers); since then it has been

used increasingly in its political sense, i.e., as applying to institutional relationships and as being reflected in pluralism, tolerance, constitutional government and the protection of civil liberties. The extreme-right *Front National*, too has given itself an "American" face. Its leader, Jean-Marie Le Pen, has pretended that his party is of the classic liberal persuasion;²⁹ he has expressed admiration for American Republicans, and his office has disseminated photographs showing him standing with prominent Republican leaders.

The decline of ideology and the programmatic convergence between the main political parties have been accompanied by changes in electoral mechanisms and voting behaviour. Functionally, the two-ballot system of elections in France is somewhat similar to that of the system of primaries in the United States; in fact, the French have been referring increasingly to the first round of elections as *primaires*. In the second round, personality plays as great a role as do partisan criteria. In Assembly elections, voters increasingly expect their candidates to be identified with their constituencies. Much as in the United States, there has been a gradual disjunction between expressive and instrumental attitudes: just as many Americans who voted for Reagan in 1984 did not approve of his economic policies, so many French citizens who voted for Mitterand in 1988 did not endorse Socialist policies.³⁰

French patterns of campaigning, too, have come to resemble those of the United States. Specific policy promises have been replaced by reassuring but not very meaningful slogans used by the presidential candidates. The appeal to the broad masses has been balanced by selective and tactically appropriate appeals not only to competing social and economic interests, but to ethnic minorities as well. Ethnic policies in France have been moving, however unevenly, in an American direction.

Whether Harlem Désir's "SOS-Racism", the anti-racist solidarity movement, was an imitation of Jesse Jackson's "Rainbow Coalition" is impossible to say;³¹ but there is no doubt that *Renouveau Juif*, a highly political group set up in the late 1970's, tried to model itself on the American Jewish lobby. In any case, the perceived importance of the "Jewish vote" has led politicians with national electoral ambitions to undertake voyages to Israel that have almost assumed the character of a ritual; and the growing political mobilisation of Maghrebis has caused candidates to address special appeals to them.

Television debates between the major presidential candidates—they began to play an important role in 1974—have been designed to give the electorate a picture not so much of the candidates policy preferences as of their “presidential” personalities.³² As in the United States (with mixed success) public-opinion polls have been used to produce bandwagon effects or underdog sympathies. Furthermore, the “marketing” of political candidates is becoming professionalised: in the 1988 elections, Mitterrand and Chirac used the same public-relations firm!³³

The rising costs of campaigning have led to a spate of proposals, including the public financing of election campaigns. In the past two years, proposals have been introduced in the cabinet and the parliament to require the publication of the personal wealth of the president, cabinet ministers, members of parliament, and mayors of large towns; to establish a commission that would see to it that politicians do not use their offices for personal enrichment, and to limit expenditures for presidential and parliamentary election campaigns.

Political culture

It is in the area of social behaviour and public attitudes toward the political system that France has experienced the greatest changes. Many of the *socio-cultural* changes bear a definite American imprint: the wearing of jeans, the eating of fast foods, the affectation for rock music, the popularity of American television serials and the growth of “Franglais”. But these changes are not the result of a conscious “Americanisation”. Rather, they must be attributed to related developments: respectively, the increasing informality of social relations, especially since the events of May-June 1968; changes in industrial work schedules, leading to the replacement of the midday siesta by the short lunch break; the spread of youth culture; the need to cut the costs of mass entertainment, and the “terminological lag” of the French language in the face of rapid technological change.

The “fear of face-to-face relations” that Crozier and others once evoked as a significant French political culture trait that was reflected in excessive familism, individualism, and *incivisme*, and that impeded the growth of voluntary associations, has now largely been replaced by increasingly “American” patterns of behaviour. The French invite people to their homes, they join associations; they question whether the state should be relied upon for everything and they distrust foreigners less than they did in the past. It is not

institutional change that produced these changes; rather it is a combination of economic modernisation, the transformation of the class system, the decline of the peasantry, the impact of the European Community and a mixture of deliberate public policies.

The Americanisation of one kind of pattern may beget the Americanisation of another pattern. Thus, the institutionalisation of collective bargaining at the plant level (under the Auroux laws of the early 1980's) came at a time when the ideology of most major trade unions was itself Americanising—in the sense of coming closer to American “business unionism” with their acceptance of capitalism (though that change occurred several decades after the founding of the *CGT Force Ouvrière* had been “inspired” by the AFL CIO).

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This development, however, came at an inauspicious time during a period of postindustrialism, marked by the decline of smokestack industries, growing unemployment and a general decline of the power of unions.³⁴ Therefore the legal buttressing of the rights of unions has had disappointing results for those who expected a significant expansion of the workers' bargaining powers.³⁵

When one observes French *political* culture, one is struck by its gradual Americanisation. According to conventional wisdom, the French, while

distrusting politicians and having reservations about a particular regime, used to have an awestruck, if not mystical, notion of the state that has given way to growing doubts about the omnipotence of the state.

The demystification of the state has gone hand in hand with the loss of standing of the institutions associated with the state and the various elites once closely identified with it: the state bureaucracy, the political parties, the politicians, the university professors and the Catholic Church. Recently an observer remarked that whereas in the United States, politics had ceased to be respectable since the era of Andrew Jackson and that "getting elected to Congress was considered ... less acceptable than playing piano in a whorehouse", in France, by contrast, "politics [had become] a substitute for the noble estate as a base of prestige".³⁶ Many others have echoed this perception; they have called the French political and administrative elite one of the most sophisticated and respected in the world.

The relative image of the higher civil service is attested to by the fact that the people with the most prestigious diplomas go into the *grand corps* rather than private sector,³⁷ and that the degree of public confidence in the civil service and other state institutions is considerably higher than that expressed toward the world of (private) business.³⁸

Nevertheless, there has been a steady erosion of support for "*la politique politicienne*" and for "*la classe politique*" that pursues it. The public confidence in *all* political parties has declined; and although the Socialist party enjoys a larger degree of support than other parties, it is the president of the Republic (in his personal capacity) who has inspired a far greater trust. An increasing number of French voters no longer place themselves ideologically on the right or the left, but rather in the political centre. This shift is evidenced by the steady decline of registered party memberships, the growth of the "floating vote", and slowly rising abstention rates. That is particularly true among younger voters, many of whom feel that the electoral marketplace does not offer them meaningful choices and that their votes make little difference.³⁹

The higher civil service, too, has been affected by the declining image of the world of politics. Even the graduates of the prestigious *Ecole nationale d'administration* have not been exempt. In recent years several books and many articles have been published that attack the social exclusivism, semiascriptive recruitment and even technical competence of the *Enarchie*.

University professors, too, have become the object of criticism; the traditional privileges of the “mandarins” have been questioned, and their relative socioeconomic status has been lowered. One reflection of that development has been the gradual loss of control of the public intellectual establishment over the “purity” of the French language (though far from approaching the *laissez-faire* attitude of public authorities in the US regarding English language standards).

Another instance of “Americanisation” is the growing challenge to the monopoly of the state in education and information. In 1983-84, when the government attempted to put the private schools under more rigid state control, there were massive public demonstrations. A large proportion of the French people seems to favour the coexistence of a public and private (for the most part parochial) school system. For the parents of pupils in private elementary and secondary schools (about 15 and 20 per cent of the respective totals for each level) this is a practical concern. Many of them—like parents in the United States—send their children to parochial schools not to learn religion but to keep them away from the public schools that cater to “problem” children from the underclasses. But for many other French citizens, a pluralism of educational systems is a matter of principle.

The belief in the maintenance of the parochial schools coexists with a steady decline of religious practice. The overwhelming majority of Roman Catholics do not go to mass. Many of them are not in accord with the Church’s social and moral position; others have a “protestant”—i.e., personal rather than institutional—approach to religion. Still other French people, much like their American confreres, have come to feel that none of the “established” religions is able to respond to their loss of community and sense of alienation. They have turned to substitute sects and cults—among them the Unification Church and Hare Krishna—whose combined membership in France is estimated at well over 500,000.⁴⁰

The sanctity of the traditional family has been challenged as well, as indicated by statistics about rising divorce rates, common-law marriages, and abortion. These developments are manifestations not merely of the traditional French individualism, but of self-centredness. French observers have been discussing the “*moi, je*” generation⁴¹, whose attitudes, although similar to those found in the United States, cannot be said to have been directly “imported”. Rather, they are the consequences of pressures of upward mobility, of the availability of a vast array of material goods and of cynicism.

The preoccupation with private ends has led to a greater litigiousness among French citizens. From the early 1970's to the mid-1980's there was an augmentation of more than 100 per cent in civil suits coming before the *Cour de Cassation*.⁴² This "judicial explosion" is likely to lead to a situation well known in the United States and a vast expansion of their role.⁴³ There has also been an increase in the possession of firearms, a phenomenon indicative of a selective "privatisation" of approaches to law and order.⁴⁴

Both the distrust of the state and the concern with the private sphere have led to a rediscovery of the autonomy of "civil society", as expressed through social units independent of the state. Shortly after becoming prime minister, Michel Rocard took account of the non-governmental sector by appointing to ministerial positions a number of individuals who were connected neither to political parties nor to the higher civil service and by announcing that he would endeavour to make policies together with "civil society".

There have been hesitant steps in the direction of a decoupling of *état* and *nation*: a partly de-Jacobinised approach to defining France in terms that have come to resemble those used in the United States. Several generations ago, the French nation was regarded as composed of Catholic descendants of Gallic, Celtic and German tribes; today, more and more intellectuals and politicians (except for orthodox Gaullists and adherents of the far right) speak of a French "plural society" composed of various native and immigrant ethnics, and even discuss the possibility of a U.S.-style disaggregation of citizenship and nationality.⁴⁵ There is a much greater tolerance of "otherness" than before; the civilisation of France, once "the eldest daughter of the Church" and the land of the Dreyfus affair, is now often seen as informed by "Judeo-Christian" values, much in the same way that American society sees itself.

The inclusion of Jews as full members of a basically Christian nation is not the result of a deliberate use of the US model; it is, rather, an unintended consequence of attempts (conducted mostly by the political right) to promote anti-Moslem sentiment. In this connection, one may speak of an "Americanisation" of ethnic prejudice and racism. A generation ago, French heterophobia expressed itself largely in hostility toward those who represented alien cultures. Since there were only a few thousand blacks in France, the majority of whom were bourgeois products of French schools, they were rarely the victims of racial hatred; nowadays, the black population in France—more numerous, and for the most part lower class and

semiliterate—has reached a “threshold” point at which, as in the United States, it is the object of ordinary racial prejudice.

An interesting symptom of the loss of position of the state has been the progressive depolitisation of the electronic mass media and the press, both of which have come to resemble those of the United States. Yet although many of their programmes parallel American ones—or are in fact American—the French television networks, most of which are now privatised, have a long way to go before they imitate the great American national networks in broadcasting embarrassing revelations about government scandals. Since the 1970's a number of public bodies have been created in attempts to increase the autonomy of the media. But there have been complaints that France is backward compared to the United States, because the bodies in question are neither as independent nor as effective as the US Federal Communications Commission, and because the French television viewers associations are too weak to lobby with these bodies and are not consulted.⁴⁶

The French press has come to resemble that of the United States even more closely than have the electronic media, both in the increasing concentration of ownership and in its depolitisation. Prominent daily and weekly newspapers (with a handful of exceptions) have gradually relinquished their role as “counter-powers” of the right or the left and have tried to become purveyors of information.⁴⁷ A recent episode illustrates the ideological (or perhaps anti-ideological) fascination exerted upon the French by the United States. When Franz-Oliver Giesbert, long-time reporter of the leftist *Nouvel Observateur*, became editor-in-chief of the conservative *Le Figaro* (in September 1988), he asserted that he had never been a real leftist, but rather a “liberal” in the American sense of the term, and that he planned to transform *Le Figaro* into an American type of newspaper.⁴⁸

Public policy choices

For many years, specialists tended to agree that in France the economy and the state were much more tightly linked than in the United States. The state was active in promoting industrialisation and economic self-sufficiency by means of taxes, protective tariffs, subsidies, and price controls. To be sure, there was also a laissez-faire tradition that periodically informed the behaviour of French entrepreneurs and influenced decision-makers. However, for a variety of reasons interventionist orientations frequently won out over classic liberal ones: the

selfishness of the business sector, the weakness of trade unions, the relatively small size of the French market, the lack of investment capital and the social, demographics, environmental and health problems that the private sector was unable, or unwilling, to solve by itself.

After World War II, French policy makers opted for a mixed economy, in which the system of capitalist production and marketing was maintained, but under the guiding hand of the state. Under the “indicative” four-years plans inaugurated in 1946, governments attempted—by Keynesian fiscal methods—to steer private industries in a desirable direction, and intervened directly in the economic process by means of nationalised credit institutions, public utilities and selected industries. Interventionist policies were accepted both by the left and much of the right, but there were disagreements about the ingredients and the purpose of such policies.

In view of this state of affairs, American social scientists would regard France as departing markedly from the US (or Anglo-American) ideal-type. On the one hand, the etatist orientation signified an inability to distinguish clearly enough between polity and economy; on the other hand, the disagreements on public policy among the major parties indicated a dissensus about the nature of the political system.

In recent years, however, much has changed. An astute observer has argued that “numerous [pieces of] legislation recently adopted in France ... notably in economic matters (right of competition, regulation of the financial market, environment) have come to [France] from the other side of the Atlantic”.⁴⁹ However, most of these measures have not been conscious imitation of the United States; rather, some have reflected the changes in the French socioeconomic system, the political culture, and the orientations of the political parties, others have responded to the pressures of the European Community, and still others have been pursued simultaneously in both countries.

An American influence can clearly be detected in the educational reforms that France began to undertake in the mid-1960's and that are still continuing. The once rigidly classical curriculum was gradually modernised with the inclusion of a larger number of courses in science, mathematics, “civics”, and modern languages; the traditional screening of pupils for entry into the *lycée* at the age of ten was replaced by a middle school, or “comprehensive”, system (*collège*) in which a uniform curriculum was provided for students up to the age of

fourteen or fifteen, and the subsequent guiding of the students into the various "tracks" became a task in which students, teachers and parents participated. The consultation with parents has become more institutionalised with the growth, on local levels, of "associations of parents of pupils". The once highly centralised approach to education was modified, too, as the school districts (*académies*) were given greater discretion in curricular matters, enrollment policies and the "integration" of immigrants and other disadvantaged categories of pupils. There were founded private (but publicly subsidised) progressive schools (*écoles nouvelles*) in which new methods of education were tried and in which student-teacher relations were close and informal.

Higher education, too, became partly "Americanised", as new universities were established, often on US-style campuses outside the city centres, new "departments" (*unités d'enseignement et de recherche*) replaced the old "faculties", and the majestic status of the full professors was modified with the appointment of many additional teachers with a variety of ranks. Educational reformers as well as students put increasing stress on business, engineering, and other "practical" subjects in place of the old "liberal arts". The proposals of Education Minister Lionel Jospin (much like those of René Monory, his conservative predecessor) about the "upgrading" of the academic profession appear to be inspired by the American example in suggesting that the universities take account of the professors of mathematics and other fields than to those who teach the more traditional subjects.⁵⁰

Educational policy debates in France have also come to resemble those of the United States: the issue of democratic access and equal opportunity and the threats posed by the *massification* of education to the maintenance of standards



of literacy;⁵¹ the integration and cultural assimilation of immigrants through the use of French as the sole language of instruction, as opposed to the encouragement of ethnocultural diversity, and the extent to which French schools should consult with the leaders of industry and commerce in shaping the curriculum.

It is in the domain of economic policy that France appears to be clearly learning from the United States. As President of the Republic, Giscard had set the tone with his "advanced liberalism". Henceforth, there would be less reliance on the state or on an authoritative economic plan, and more on the market. The government would limit itself to facilitating competition and the conquest of foreign markets: price controls and import licenses were gradually abolished; private firms were encouraged—by means of tax concessions—to consolidate; the public sector (for example, transport, and health insurance) was urged to seek self-reliance by raising rates, and the unions were asked to secure improvements in wage and fringe benefits through collective bargaining.

When the Socialists came to power in 1981, they pursued a policy that was aimed at the total revamping of the economy in a "socialist", rather than "social-democratic", direction that emphasised redistribution rather than production. Minimum wages were raised substantially, social-security benefits were increased, the number of days of paid vacations was extended, corporate taxes were raised and a surtax was imposed on the rich. In an attempt to alleviate the unemployment problem, thousands of new public-service jobs were created. The rights of unions to bargain at the plant level were extended; and finally, about a dozen industrial firms and most of the remaining private banks were nationalised.

But by the end of the 1982 the government was faced with a number of problems: increasing rates of inflation, business bankruptcies, and unemployment, a worsening balance of trade and a growing national budget deficit. The government responded by abruptly altering its economic policy orientation. It embraced an *ad hoc* austerity programme that included price restraints, a de-indexing of salaries, limits on consumption, the control of spending in foreign countries, a rise in social-security deductions and a delay in the reduction of the workweek. Although the Socialists did not follow the Reagan model, they did modernise the French stock market "along American lines".⁵²

When the coalition of right-wing parties assumed power in 1986, they were intent upon putting the country's economy on a firm footing by relying more on the market and less on the state. Both the Gaullist leaders (most of whom had replaced their etatist ideology with a "neo-liberal" one) and their Giscardist allies now pursued a policy of "*déréglementation, défiscalisation, désétatisation*", which many saw as inspired by Reaganism. It included the denationalisation of industries, the reduction of corporate taxes, the abolition of the wealth tax, the raising of social-security deductions and public-service (e.g., railroad) rates, and the loosening of controls over financial transaction. Reaganism was also echoed in the government's approach to culture. It hoped to save money by reducing public support for libraries, museums, theatres, and orchestras by resort to the *mécénat* or *sponsoriat*: the appeal to private corporations and philanthropists who (in exchange for modest tax concessions) would take over the founding of cultural, educational and athletic programmes.

When the Socialists returned to power in 1988, they were more or less reconciled to the capitalist system; their programmatic orientation had, in fact, come to resemble that of the liberal wing of the American Democratic party.

Varying explanations

The controversial relationship between political culture and institutions complicates the discussion of Americanisation. It is not certain whether changes in executive-legislative relations have *caused* the decline of rigid ideological commitments of politicians or, conversely, whether the above-mentioned changes are institutional *consequences* of a decline of ideology. A similar uncertainty prevails about the causal connections between institutions and public policies. Has the Americanisation of institutions facilitated an Americanisation of policies, or vice versa? It seems clear that deregulation, privatisation, and decentralisation could have been promoted as easily during the early years of the Fifth Republic had the decision-makers of that period had the political will to do so. Conversely, the existence of complicated "un-American" elite bargaining structures dealing with socio-economic matters, including the planning institutions, did not prevent the turn toward the "market" and to a variety of *ad hoc* policies (undertaken by Giscard) by the Socialists after 1983, and by the Chirac government in 1986.

The Americanisation of France, as we have seen, has signified changes in socio-economic relations, political culture, institutional relationships,

governmental patterns and public policies. Some comparativists tend to explain most changes in terms of political culture; others attribute culture changes, pattern transformations and public policy innovations above all else to institutional changes. It is true that judicial review developed rapidly as a result of the constitutional amendment of 1974 that permitted groups of deputies or senators to bring cases to the Constitutional Council, and that the growth of catchall parties, the softening of their class appeal, and the muting of ideological differences were facilitated by changes in the system of elections; but these changes were themselves the results of policy decisions that responded to changing public sentiments.

Thus, the change in institutional relationships discussed above—specifically, the checks-and-balances relationships between legislature and executive—was made possible because of a change in the party system. Interparty collaboration became easier, and patterns of alternation became less threatening to the political system of the Fifth Republic, because a progressive decline in the traditional ideological rigidities produced a convergence between the major parties. In turn, the “decline of ideology” reflected a widespread consensus among the mass of citizens about the legitimacy of the political system. That consensus, in its turn, must be attributed to a change in the social system and the concomitants of that change: a weakening of the class struggle; the decline of the peasantry, and with it, of political Catholicism, and the displacement of the humanistic elite by a technocratic, market-oriented one less committed, by training and orientation, to specifically French cultural values and more to a scientific and universal outlook.

The matter remains controversial; nevertheless, the weight of evidence at present leads to the emphasis of non-institutional factors. The increasingly favourable view of the United States held by French men and women in the past two decades, and especially since the end of the 1970's—a development that has made them much more receptive to things American—was not the outcome of a restructuring of political institutions; rather, it came about largely for the following reasons: the increasingly negative judgement of the Soviet Union—and its domestic and foreign policies—a development attested by the great popularity of Solzhenitzyn's novels, in light of which American political behaviour appeared much more positive; the receding memory of the McCarthyism of the 1950's; the progress achieved regarding the civil rights of minorities, and especially blacks; the end of the war in Vietnam, which showed that the United States was also a country that could lose a war, belying its

reputation as an omnipotent and unconquerable giant; the dethronement of the dollar and—since the oil embargo of the mid-1970's—the vulnerabilities of the US economy, which suggested that the fears of American economic imperialism had been exaggerated; the diminishing influence of Jean-Paul Sartre and other basically anti-American *maitres-penseurs*;⁵³ the decline of Gaullism and Marxism, the two most important anti-American ideologies; the evolution of French society and economy, especially since the late 1960's, an evolution reflected in a loosening of social relations, the gradual *embourgeoisement* of the working class, and mass consumption⁵⁴—all of which brought about a rapprochement with the United States; the “harmonisation” of French laws and policies with the supranational norms of the European Community, which propelled France into the competitive struggle and caused that country to look more closely at the United States, with its experience in operating in a larger market and in containing unemployment and inflation with relative success; and the technicisation of various aspects of life, which the United States was thought to have pioneered.

To the extent that these modifications make France resemble the United States, one calls them patterns of Americanisation. But it should be kept in mind that not all of them were deliberate imitations, that some modifications occurred in both countries at roughly the same time, that in other cases, France became more “Americanised” than the United States in the sense that it went further along the road to modernity, and that in still other cases, the United States “de-Americanised” itself in the sense that it retrenched and reverted to more traditional patterns.

Thus, France seems to have gone *beyond* the United States in its institutional development. Its dual executive and its differentiated conflict adjudication and representational structures are more modern than their respective US counterparts. Furthermore, if Americanisation refers to modernisation, and the latter refers, *inter alia*, to secularisation, i.e., a declining religious faith and practice, then it might be argued that France is more “American” than the United States, for the belief in God is less widely held and church attendance is lower in France than in United States.⁵⁵ If modernity implies a functional rather than an “organicist” approach to defining membership in the political community, France has not only modernised its citizenship laws in basing nationality increasingly on *ius soli*, but has gone beyond the United States in according political rights to naturalised citizens. In 1983 it enacted a law granting them the right to run for president of the Republic.

At the same time, it is possible to speak of instances of "behavioural reversal" in the United States that make that country not only less modern than France but less "American" than it used to be. Whereas French public life has become ever more de-Christianised, efforts, frequently encouraged by high officials, at re-Christianising aspects of public life and approaches to public policy have multiplied in the United States. Whereas the French have become more tolerant

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of cultural pluralism and (especially between 1981 and 1986) promoted policies to support ethnic minority cultures and languages,⁵⁶ US citizens in several states have succeeded in efforts to make English the sole official language. Whereas during the French presidential elections of 1988, François

Mitterrand tried to be a “unifier” and by his transpartisan behaviour succeeded in disorganising the Socialist electorate, Ronald Reagan polarised the electorate ideologically during the elections of 1980 and 1984, and George Bush, during the election campaign of 1988, mobilised all the reactionary forces he could find and made overtures to Democrats difficult by his relentless attacks on “liberals”. Whereas Fifth Republic presidents have come increasingly to rely on the advice of *Enarques*, recent US presidents have relied heavily on the advice of “cronies” from their pre-presidential years and even (in one reported instance) of astrologers.

If a higher level of modernity implies a “post-materialist” culture—i.e., a reduced emphasis on economic and social security and other bread-and-butter concerns and a greater emphasis on cultural and aesthetic concerns—France may be said to have transcended the United States, a country often seen as a model of postmaterialism.⁵⁷ Whereas French governments (in particular Socialist ones) have increased the per capita expenditure for symphonies, theatre, the arts and public monuments, governmental support for these cultural products in the United States has declined (especially since the onset of the Reagan administration) and economic hardships among the working and lower-middle classes have increased. Whereas the French educational curriculum has been continually updated to include more science and mathematics, the quality of instruction in these subjects in United States has steadily deteriorated. Whereas the French, from the presidency of Giscard d’Estaing to the present, have been investing heavily in advanced industries, such as telecommunications, mass transportation and aeronautics, and have been trying (though with mixed results) to break into the global market, the United States has appeared to be more successful in exporting agricultural products than manufactured goods. And whereas the rate of political participation of the French on various levels has remained *relatively* stable, the American electoral turnout has been steadily decreasing

It is probable that the American departures from modernity will be arrested and reversed, so that the United States and France will continue their process of convergence. that process, however, is likely to be largely unidirectional, at least in the foreseeable future. From the days of colonial settlement to the middle of the 19th century, many US political institutions, the common language and the dominant culture were imported from Western Europe, because most of the settlers had themselves been transplanted from Europe. As American social, cultural and political patterns developed in response to

American needs, the Western European influence on the outlook and behaviour of Americans diminished, apart from a small intellectual elite that went to study in Europe. As far as the general public was concerned, the belief in American exceptionalism was reconfirmed in the postwar years by negative American perceptions of Western European countries: of Germany as not (or not yet) sufficiently oriented to democracy; of Britain as socially and economically decadent, and of Gaullist France as mystically and narrowly nationalistic. Thus, imports from France tended to be confined to *haute couture*, perfumes and culinary items. In view of the difficulties France (like other West European countries) is having in reducing unemployment, controlling pollution and fighting terrorism and urban crime, it is not likely to constitute a source of guidance for American decision-makers in these matters of policy—or of others that the United States might be well advised to adopt.

Constraints on Americanisation

The Americanisation of France has its limits. Some American features experience a sea change *en passant* or are transmuted, upon arrival, to make them fit the unique French environment; others cannot be fitted at all because of a variety of cultural, contextual, and spatial constraints.

Thus, although the old ideologically oriented political campaigns are being replaced by personalised and commercialised ones and politicians are being presented in ordinary human surroundings and even caricatured,⁵⁸ the French people still prize the elements of intelligence and literacy in their political leaders and would be unlikely to tolerate a candidate for high office who must read his lines from a teleprompter or who does violence to the national language. The typical French voter is not likely to read the highly intellectualised platforms still occasionally produced by the political parties, nor to digest a political statement of fifty pages.

It can be argued that given the almost complete elimination of religion from public life, and certainly from the public schools, France has not only Americanised but reached a “post American” stage;⁵⁹ that Protestants in that country have in recent years asserted themselves even more strongly in industry, banking, the *Enarchie* and—especially under the Mitterrand presidency—in national cabinets,⁶⁰ and that these developments have taken place at a time when “WASPs” are said to be losing power in the United States, the proportion of Catholic Latinos is growing and the “Protestant ethic” is

being perpetuated by Jews and East Asians. However, the tendencies to Protestantisation and secularisation of France are being checked by a steady "Islamisation" of the country.⁶¹

Furthermore, if the Protestant ethic is expressed in saving, investing, and deferring profits and consumer satisfaction, then it is contravened in France by an extensive redistributive policy system, including various forms of subsidies that increase consumption.

The acceptance of neo-liberalism is much more limited in France than in the United States, and "socialism" still has positive connotations. Despite a wide discussion about the role of the market, the emphasis on the production of public goods will remain much more significant in France than in the United States, because of spatial and resource limitations that engender a Malthusian ethos.

Although the politics of interest groups continues to evolve, their unlinking from the state may take longer because the "officialisation" of socio-professional groups symbolised by *ordres professionnels*, *établissements de droit public* and the functional representation of associational groups has a long history, and a full acceptance of "lobbies" is still impeded by vestiges of Rousseauan and Jacobin hostility to intermediaries. For the same reason, although "plural society" is more readily accepted today than in former years, it is not likely that the French would accept American-style ethnic lobbying or ethnically "balanced tickets". And although intensive discussions are in progress regarding variable meanings of citizenship, it is unlikely that the French will develop an equivalent to the "hyphenated American". France has hesitantly initiated policies of "affirmative action", but these have catered to repatriates and women rather than to ethnic or racial minorities, because of the long insistence by the French that there were no such minorities in their country and because of the inheritance of the Napoleonic ideal (or myth) of non-ascriptive recruitment and promotion.

Similarly, privatisation has its limits with regard to culture and the arts in a country in which these matters had been the domain of the state for centuries. Moreover, the idea of the *mécénat* has made little headway because of an underdeveloped tradition of corporate philanthropy. And while French ministers of culture have been impelled to promote more or less vulgar mass culture in order to counter American "cultural imperialism", they have been

subjected to counter-pressures from intellectuals who view culture in more rarefied elitist terms and whose role in the political arena has continued to be much greater than that of their colleagues in the United States.

There are many other constraints to the institutional adaptation of French politics in an American direction. Among them are certain "pattern variables" in France that differ markedly from those of the United States. Thus, there is little likelihood of the adoption of US-style plea bargaining in a country with a heavy tradition of Roman law and a wide network of highly differentiated regional and local courts. Decentralisation will not culminate in federalism, for the notion of the unity of state and nation remains too deeply embedded in the French mind, despite a continuing questioning of whether the Jacobin myths about a homogeneous French policy still apply. The political reach of the Constitutional Council—and therefore of judicial review—is still limited by the view of the Constitution as the product of, and ultimately as subject to, popular sovereignty; and the decision-making power of the new technocracy is still restricted by the notion that the state is more than a mere problem-solving machine. For the same reason, the dynamic of "privatisation" is still impeded, and any meaningful retrenchment of the welfare state is still blocked by a continuing acceptance of the role of the state as the best agent of regulation and resource allocation. But the constraints of institutional arrangements are not absolute; they could—and probably would—be changed if the evolution of society, economy, and political culture made the changes desirable, or if policy considerations were important enough to make them necessary.

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