A Sociological Perspective of Racism and the Supreme Court

Sidney M. Willhelm

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A S THE NATION EMERGED from World War II, the American Negro could boast of substantial economic progress in comparison to his past. The prosperity of a wartime economy encouraged thousands to move North and into better-paying, more responsible factory positions. Though this success diminished somewhat upon the return of white veterans from the war front, the overall picture reflected unquestionable advancement. The Cold War and the Korean conflict kept the economy booming so that, despite the setbacks of recessions, the Negro income relative to white reached an all-time high in 1952. Between 1940 and 1955, Negro per capita cash income more than tripled, and white-collar employment rose half again as much as it had been. Negroes purchased houses; in fact, home ownership jumped 137 percent, so that fully one-third of all Negro families owned their homes by 1955. They sent their children to college, paid the costs of superior health care, and, through mortgaging and installment plans, acquired necessities and luxuries previously enjoyed only by white Americans. There was no massive, organized effort to push Negroes into white society; the great

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thrust of economic prosperity provided the waves upon whose crests the Negro rode into better times.

White approval seemed certain when whites themselves began to respond with legal reforms for the removal of color restrictions. President Roosevelt did away with some discriminatory practices in both civilian and military life. President Truman continued the trend by making military segregation and discriminatory promotions illegal. The 1948 Democratic Party platform announced vigorous political commitments to the advancement of civil rights. The Supreme Court, in 1944, declared white primaries unconstitutional, and by the mid-fifties the "separate but equal" principle was disallowed through many decisions: the Court eventually ruled against discrimination for public education and in interstate transportation; it refused to permit enforcement of housing covenants designed to deny Negroes the opportunity to buy homes; it upheld civil rights legislation; it extended voting rights to Negroes.

The momentum established in the fifties appears, at first glance, to have been sustained in the sixties. The era of Civil Rights heightened among both blacks and whites. The sit-ins, demonstrations, and campaigns loomed forth to pressure White America into compliance with legal mandates entrusted to all citizens by the national Constitution and to approve laws assuring equal rights for all persons regardless of color. As one legal restraint faded after another in the Court of law, as one civil rights bill after another passed from the halls of Congress to White House approval, and as one Negro after another registered upon the voting rolls for the first time, Negroes

sensed the assurance of acceptance *into* mainstream America.

Yet, by the mid-sixties the massive legal alterations for accommodating the nation's black minority had hardly assured improvements comparable to expectations. The insurrections in Watts, Detroit, Washington, D.C., Newark, and other cities convey acute dissatisfaction in the midst not only of general economic prosperity but also in an era of constitutional equality unmatched since Reconstruction a century earlier.

Report of the National Advisory Commission on Civil Disorders

The *Kerner Report*[1] has done much to demonstrate the presence of genuine grievances and to expose white ignorance, *e.g.*, the belief that Negroes live comfortably due to state and federal assistance, such as the passage of civil rights laws, decisions of equality by the Supreme Court, etc. "The ills of the ghetto, the difficulties of life there, the Negro's burning sense of grievance, are seldom conveyed," explains the *Report*. "Slights and indignities are parts of the Negro's daily life, and many of them come from what he now calls 'the white press'—a press that repeatedly, if unconsciously, reflects the biases, the paternalism, the indifference of white America."[2] Admirably, the *Report* strongly emphasized, at a time when social scientists were staunchly proclaiming theories to the con-

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[1] REPORT OF THE NATIONAL ADVISORY COMMISSION ON CIVIL DISORDERS (Bantam Books ed. 1968) [hereinafter REPORT].
[2] *Id.* at 366.

trary, the racist nature of American so-
ciety. Racism still haunts a nation whose
Supreme Court supposedly removes the
debilitating impact of color—so much so
that, in the phrasing of the Report, "[o]ur
nation is moving toward two societies, one
black, one white—separate and unequal."[3]

The Report, although highly commend-
able for its many insights and empirical
confirmation of racism, fails to explore just
how decisions by the Court embrace the
creation of two societies based upon color.
Indeed, the substantive relevance of civil
rights rulings for racism during the "War-
ren era" receives no particular attention.
Yet, one would expect that racism could
not very well expand to the point of
stringent racial separation acknowledged
by the Report without the sanction of the
Supreme Court anymore than the practice
of segregation could have survived without
favorable Court rulings. In short, the Re-
port failed to ask the pertinent questions:
Is the Court, consciously or unconsciously,
advancing racism by an emancipation
based upon equality? Is the Court reflecting
or eliminating America's racist heritage?
Does the Court establish a principle of
Justice by passing rulings based upon the
Equality standard?

These questions could not be raised,
much less answered, within the Report
simply because equality itself is seen as
a basic democratic tenet which must be
sustained; America must uphold equality
not only on the ideological level but as a
fact of life. There is, however, good reason
to contend that by predicating post-World

War II civil rights rulings upon equality,
the Court justifies rather than repudiates
America's racism. Consequently, Negro
protest expands into violence, for Supreme
Court judgments not only fail to prevent
but indeed promote expansion of racial
separation throughout the country. "A
hard analysis of the Court's race-relations
record," Lewis M. Steel correctly con-
cludes, "discloses that the defenders [of
the Court's civil rights decisions] have been
pushed into supporting an institution which
has not departed from the American tradi-
tion of treating Negroes as second-class
citizens."[4] This conclusion can be drawn
because equality itself is a racial myth.

Justifying a Racist Society

America has been a racist society from
its very beginning—adopting, modifying,
and dispensing with tactics extending from
complete acceptance of ethnic aliens in the
form of acculturation and amalgamation to
liquidation. Myths of racism, however, are
the rationales White America creates to
enhance the racist tradition. To sanctify
its racist commitment, White America ex-
horts justifications which alter in light of
changing conditions. To dispose of an un-
wanted race, whites avoid the pangs of
compunction simply by confessing to the
submission of racism in accord with the
absolutes in the myths of racism.

God and Nature

Initially, whites perceived the Indian
and Negro in terms of the Christian myth;

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[3] Id. at 1.

[4] Steel, Nine Men in Black Who Think White,
N. Y. Times, Oct. 13, 1968, § 6 (Magazine), at
56.

the two peoples were heathens. Both were repugnant to whites and Christianity legitimatized the repugnancy so that Negroes and Indians were viewed as nonhumans at best and beasts at worst. The stigma of heathen meant that Indians could be slaughtered, while Negroes were mercilessly enslaved as beasts of burden. Extermination for the former and subjugation for the latter were acts of civilization progressing over soulless creatures. Nonetheless, white men could follow the spirit and letter of Christian theology without fear of contradiction. The God of Salvation is most pleased by a diligent, industrious, and energetic people; if God could not very well admire the lazy Indian and Negro it would be too much to expect whites to admire what God Himself admonished.

Eventually, Christianity transformed both Negro and Indian from beast to human. But in spite of the conversion, whites still sentenced the Indian to extermination and the Negro to enslavement by advancing the theory of inherent, natural white superiority over all others; white men dominated because of the natural dominance of white.

In the thought of early American whites, no white man *ever* commands because he *chooses* to do so; it is not by his choice, but by the will of God or the act of Nature that he rises to the fore at the expense of "inferior" races. To rule is really to submit, in the first instance, as an obedient believer of God's command and secondly, as a helpless pawn abiding by Nature's laws governing the races of men. "The causes which the Almighty originates, when in their appointed time He wills that one race of men—as in races of lower animals—

shall disappear off the face of the earth and give place to another race, and so on, in the great cycle traced . . . by Himself, which may be seen," explained General James H. Carleton when serving as commander of the military department of New Mexico in 1866, "but has reasons too deep to be fathomed by us. The races of the mammoths and mastodons, and the great sloths came and passed away: the red man of America is passing away!"[5] Were whites to ignore the obligation to rank supreme according to natural and supernatural laws, they would submit themselves to the possibility of becoming beasts like the Indian and Negro. It was God's will to bless the industrious white for his good sense in condemning the lazy Negro and Indian; it was the operation of Nature that placed the white on top as overseer of inferior people. The white man felt virtually helpless before both Nature and God. Could any man dare to dare Nature? If so, then his fate was sealed, doomed to elimination; if one did not rule by Nature's rule, he could not rule, but would instead be the object of eradication and enslavement. And could any man dare defy God's own dictum of righteousness? If so, then he stood to suffer forever the fire of eternity's damnation.

The white man's problem for the better part of 400 years has been the necessity of making racism palatable to himself. What social thought could be conceived to justify white rule over all other skin colors without degrading whites in the very process of belittling nonwhites? The answer was to be found within the very system of

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[5] See H. E. FRITZ, MOVEMENT FOR INDIAN ASSIMILATION 123-24 (1963).

control which regulated the whites' own life chances, namely, *external forces.*

As long as the white American lacked in technological development, he would, to that extent, perceive his fate *determined* by some *outside force.* If his welfare were not within his own hands, then the white person placed his trust for his existence in an external determinant. Thus, man employed his farm tools within the bounds of utility, and when facing the wrath of Nature, such as during droughts or plagues, prayed to his Creator for better farming conditions. The Lord who could control Nature, and hence, so much of the white man's own success, must therefore possess control over all creatures. Surely then, whites could not suppress blacks into slavery in order to expand the agricultural economy through the farming of commercial crops such as cotton, tobacco, and sugar cane unless God so willed; if human enslavement of blacks by whites offended the Lord of all, it would be expected for Him to intervene immediately and right any wrong. As whites linked their own fate with Nature's whims and God's command, they, in turn, extended the interpretation to account for the Negro's subordination.

A Change of Allegiance: The Equality of the Supreme Court

With the expansion of industrialization, social life replaced dependence upon Nature. With reduced obligation to Nature it would be inevitable that there would be less responsibility even to God. Such drastic changes would, of course, undermine the established myth of racism; the disentombment of the Negro appeared imminent. White America faced the prospect of

removing all external reasons for restraining the Negro, unveiling to itself the reality of its racism without any recourse to exonerate whites. "It is neither God nor the physical universe the American [has come to] fear . . . since he sees himself as the associate of one and the master of the other. What he truly fears is his fellowman."[6] Unless whites could come through with some kind of omnipotent rationale as immutable as both Nature and God seemed to have been at first sight, then the white hold over black stood to lose its legitimacy. Where could whites turn to sanctify their treatment of blacks?

Today, it is the highest Law of Man sustaining the Negro in disrepute. Constitutional law provides the external mandate to which all men must comply. It applies equally to all without favoritism or discrimination on the basis of skin pigmentation. Its equal provisions must be enforced with the same authority as God's will and Nature's dictums held sway in previous days. "Immutable" notions of parity burst forth with full assurance of righting the 350 years of wrong committed against a dark-skinned minority. Numerous whites and blacks declare in unison a national commitment to eliminate racism through equality, endeavoring to initiate the Negro into the freedoms enjoined and enjoyed by whites.

Are Negroes advancing toward equality? There is no doubt about it; they are indeed. But where is the advancing leading them? As legal retributions seemingly remove

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[6] S. C. HIRSH, THE FEARS MEN LIVE BY 3 (1955) (quoting Francis L. K. Hsu).

racial segregation and discrimination in education, transportation, military service, housing, and so forth, whites turn to other measures to deprive the Negro people. The new efforts are designed not to subjugate, oppress, or exploit the black minority, but rather to separate the two races. *And this is more readily accomplished by treating any Negro the same as any white.* White America, by invoking the equality standard, reverses the maxim "separate but equal" to "equal but separate." The placement of "equal" before rather than after the qualifying "but" accords with the present myth of racism—constitutional equality—and assures the identical outcome as the pre-1954 Court-sanctioned "separate but equal" maxim: Negro removal. Today, the exclusion of blacks is intended to assure total isolation whereas yesterday the separation conveyed inferiority to the whites. Unlike segregation, which prescribed an inferior status, separatism divides the American population according to race in order to inhibit racial contacts. Whites established segregation to keep the Negro in place; they now wish only to banish the Negro out of sight and beyond empathy or understanding. With three-quarters of the Negro population now living in the cities and 80 percent of the black urban population settled upon ghetto-reservations, isolation solidifies still further the Negro's very life style, so much so that "[t]he present generation of Negro youth growing up in the urban ghettos has probably less personal contact with the white world than any generation in the history of the Negro American."[7]

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[7] U.S. DEP'T OF LABOR, THE NEGRO FAMILY:

Show Me Where You Live and I'll Tell You What You Are

The rapid expansion of residential separation provides the most conspicuous evidence of black isolation by whites; the nation's black ghettos increase by 500,000 each year. As late as 1950, Negroes made up only 17 percent of Newark's population; the percentage increased to 40 by 1960, and it is estimated to be somewhere between 50 and 60 for October 1967. Typical of most metropolitan areas, the Negro population in Detroit climbs while the overall population drops; it amounted to over 525,000 out of 1.5 million—33 percent of the total—by mid-1967, whereas for 1960 the Negro population of 487,000 claimed 29 percent of the 1.67 million people living in the city. Roosevelt, a Long Island community in New York, had only a 20 percent Negro composition in the mid-fifties, but ten years later the figure stood at 60 percent. Gary, Indiana, a city of 186,000 in 1969, is 58 percent black.

The increased concentration of Negroes within cities takes place without a proportional area take-over. In 1960, Negroes made up almost a quarter of Chicago's population—23 percent—but 67 percent lived in Negro tracts covering a mere 4 percent of the city's total area; they composed 14 percent of Los Angeles' citizens but the 69 percent of Negroes living in Negro tracts took up less than .05 percent of the city's space; they constituted almost a quarter—23 percent—of Manhattan's

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THE CASE FOR NATIONAL ACTION 44 (1965). This work is more commonly known as *The Moynihan Report.*

residents, but the 59 percent living in Negro tracts could hold on to only 9 percent of the borough's territory; and in Washington, D. C., with a 54 percent Negro majority, half the Negro population is spread over only 5 percent of the city.[8]

Not only do whites flee from cities that appear to be under "attack" by an encroaching "black plague," but many important businesses and industries forsake their urban location for the 96 percent white suburb. During the past 10 years, more than half the nation's new industrial buildings and stores were constructed outside the central city. Businesses leave the city not only to follow the white, educated population in order to secure a work force, but also because of a totally new technology: the shift from industrial to automatic machinery often means an industrial concern virtually starting from scratch, since the change-over involves a complete reorganization of personnel and plant facilities. The economics of the new technology permits industry's flight from the unproductive (black) labor of an urban locality to the highly productive (white) labor of suburbia.

Should openings in suburban plants materialize, they remain out of reach for Negroes living in cities because of a combination of residential isolation and economics: implanted upon the ghetto, transportation costs for commuting effectively eliminate many from the suburban work force. It costs, for example, an estimated $40 per month in transit fare for a Negro to cover the distance from a Harlem residence to a job in Farmingdale, Long Island —a round-trip distance of about 120 miles. Needless to say, few Negroes apply for available openings that involve a commuting distance that many white suburban workers consider routine.

The racial imbalance in residential location invariably gives rise to racial imbalance throughout many other spheres. One of great consequence is reflected in the nation's classrooms. The inviolable equality principle sanctions the neighborhood for the fundamental criterion for assigning children to schools, since all races must be treated alike in a neighborhood. By enforcing uniform standards, the nation fosters an educational system with distinct racial implications: 75 percent of elementary Negro school students and 83 percent of all white students attend schools made up predominantly of their respective race. More Negroes receive their education in isolation from whites than when the Supreme Court denounced, in 1954, the principle of segregation by law; de facto educational segregation is just as possible for racial separation as was the de jure educational segregation set aside by the courts. Even if Negroes were to receive the best education in the most advanced school facilities, designation of attendance by neighborhoods reinforces racial separation. In fact, however, no such improvement can be anticipated. A thorough review by the United States Commission on Civil Rights of the various compensatory programs in operation during 1965-1966 shows vir-

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8 U.S. DEP'T OF LABOR, BULL. No. 1511, THE NEGROES IN THE UNITED STATES 7 et seq. (June 1966).

tually all to be ineffectual in overcoming educational deficiencies among Negro school children.[9]

Education

Universities may now open their doors to all persons meeting established requirements regardless of race as required by court orders because there will be few colored persons for mixed classrooms. Negro college enrollment remains low for integrated education—less than 2 percent —when judged by educational standards expected of whites.[10] Black students cannot compete against whites in great numbers; they face exclusion not only on account of skin pigmentation, but also for their lack of college preparation. Major Northern universities accept fewer Negroes than their integrated Southern counterparts. It is no wonder Southern institutions try to match the educational standards of the North since "raising the standards" lowers the Negro percentage on campus.

Jobs

Employment demands now far exceed Negro qualifications and capabilities, according to White America's economic values, such that blacks simply cannot successfully compete against aspiring whites. Inasmuch as 97 percent of new

openings fall within white-collar categories while three out of five Negroes, in contrast to three out of ten whites, qualify only up through semiskilled or unskilled blue-collar work, inequality barriers can be discarded since the collapse will still assure that the Negro will be discarded. As job requirements rise dramatically, equality in evaluating applicants apart from race excludes the Negro just as effectively as discrimination; by evaluating performance and abilities regardless of color, the Negro steps back not in deference to white but in compliance with white superiority in the form of exacting competition. Private business can project a faithful compliance to nondiscriminatory hiring practices because it need not worry that many Negroes will rush to apply. "We can show conclusively," a businessman informs us, "that there is a shortage of Negroes adequately trained to fill the positions that may be open from time to time."[11] Today, race is neither blatant nor always necessary for exclusion: industrialists simply dispose of jobs rather than Negroes. The denial of employment and promotion on the basis of equality reduces the Negro into economic servitude just as impressively as Southern sharecropping.

Armed Services

When the Negro dons the military uniform, equality keeps him out of reach of officer ranks for retention within combat units where his labor can be utilized upon

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9 U.S. COMM. ON CIVIL RIGHTS, I RACIAL ISOLATION IN THE PUBLIC SCHOOLS 115-40 (1967).
10 *See* Rosenbaum, *Study Finds State Universities Lag in Enrollment of Negroes*, N.Y. Times, June 18, 1969, at 1, col. 2. *See also* chart containing college enrollments by race entitled, *Federal Survey of Negro Undergraduate Enrollments*, in 3 THE CHRONICLE OF HIGHER EDUCATION 3-4 (Apr. 21, 1969).

11 Ginzberg, *Reports of Corporate Action*, in THE NEGRO CHALLENGE TO THE BUSINESS COMMUNITY 84 (E. Ginzberg ed. 1964).

the battlefields of Vietnam. The proportion of Negroes in combat troops exceeds "20 percent in the average infantry company, . . . [simply because] Negro recruits, with a lower average of technical skills, are less likely to be assigned to one of the technical specialties."[12] It is all a matter of assignment: the right man to the right job independent of race. The dedication to promotion free from racial dispositions rules out the Negro for all practical purposes beyond the enlisted ranks; about 2 percent of the military officers are Negro. The higher one climbs in the military hierarchy, the higher will be the educational and training requirements, and therefore the less likelihood of Negroes being present. The military service dispenses with prejudice and thereby dispenses with the Negro from higher advancements.

Property

Real estate interests promote equality in light of Court decisions and still manage to exclude the Negro. Equal economic standards for loans and housing mortgages keep the Negro from new housing just as efficiently as restrictive covenants, so that suburbs are today 96 percent white. Approximately .5 percent of Federal Housing Authority loans extend to families with incomes of less than $4,000 thereby ruling out 60 percent of Negroes without a trace of racial bias. Insurance agencies show considerable reluctance to cover Negro homeowners because of supposed high risks. It can be claimed that housing leading to racial separation is all a matter of the economics of equality, not race.

Legislation

Extensive civil rights laws pass through the federal, state and local governments proscribing widespread discrimination. Such efforts stimulate white enthusiasm and receive nominal Southern resistance because little impact upon race relations can be expected by changing legal rights from white superiority to equality. With economic forces of the market playing an important part in excluding the Negro from suburbs and since economic resources are so vital in determining where a person will go (rather than the laws providing the opportunity to go), only a small percentage of the minority can rub against the majority in eating out, flying about, and going out in general. Considerable white exclusiveness can be practiced by practicing economic exclusiveness without recourse to racial differentiation.

Unions

In 1960 there was a net gain of one Negro over the 1950 figure of 2,190 in the number of colored trade apprentices for the entire nation. But unions deny responsibility for discrimination; Negroes simply "fail" to qualify in meeting state and federal minimum requirements for certification beyond apprenticeship assignments. "We should try to help," announces George Meany, President of the AFL-CIO, with regard to accepting minority groups into the construction and building trade unions for the purpose of learning the skills. "But under no circumstances should we submit to a reduction of the standards for skilled workers."[13]

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12 N.Y. Times, May 25, 1966, at 25, col. 1.

13 N.Y. Times, June 30, 1966, at 5, col. 1.

Lacking qualifying standards, the Negro fails to secure a job if employment can be attained; if employed, he receives the rather low compensations appropriate for his humble station in life. This reward system then preordains residence in low-income housing of massive black ghettos where the opportunities are so slim that neither advancement nor opportunity can be expected for an oncoming generation. Thus, with Negro unemployment persisting well beyond the 20 percent point in most metropolitan areas, whites have ample "proof" of Negro "worthlessness." To be jobless in a society begging for applicants is, in most whites' minds, substantial evidence of deliberate laziness. Whites cannot convince themselves of any reason other than that the Negro wantonly desires to do nothing. Those who do little deserve little! So keep the welfare rolls down and payments at a minimum—not to hamper the Negro, but to discourage the notion of getting something for nothing whether one be white or black.

Equality Equals Racism

Such instances of racial separation indicate the coming trend in race relations. *Racial discrimination has not been removed entirely. But as equality comes more and more a fact of life, we cannot avoid its concomitant of increasing racial separation!* Whites are more anxious than ever to introduce equality where equality introduces racial division within America. For the arrangement then allows for Negro removal from the affairs of White America in full compliance with an idealistic democratic precept, so vividly confirmed by the Supreme Court, rather than entrance into

mainstream America. Why discriminate when one can eliminate the Negro into nonexistence by practicing equality?

White America intends to forget about its black minority by placing the Negro upon the equivalent of the Indian reservation—the black ghetto. And the demands for black separation on the part of some Negroes is not a challenge to supposed American principles of equality, but rather reflect what White America intends to do with black people; separatism is no mere slogan but a more apparent fact of life. For "physical separation of the races, is hardly less substantial now than it would be if the government of the United States, like the government of South Africa, were formally committed to a policy of permanent segregation."[14]

What makes equality a racist contention? We find an explanation in these two accounts:

> I do not doubt that my wants and feelings are fairly representative of those of most of my race. I want to be a man on the same basis and level as any white citizen—I want to be as free as the whitest citizen. I want to exercise, and in full, the same rights as the white American. I want to be eligible for employment exclusively on the basis of my skills and employability, and for housing solely on my capacity to pay. I want to have the same privileges, the same treatment in public places as every other person.[15]

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[14] R. SEGAL, THE RACE WAR: THE WORLD-WIDE CLASH OF WHITE AND NON-WHITE 263 (1967).
[15] Bunche, *NAACP Convention Address*, in THE NEGRO SINCE EMANCIPATION 140 (H. Wish ed. 1964).

> The American Negro is merely asking to
> share in whatever exists in America today,
> including its emptiness.[16]

What we discover in these typical illustrations bidding for equality is the clear statement in white terms: to be equal *according to standards set by whites.* The preference is explicitly devoted to characteristics emanating solely from whites; under the banner of equality, white expectations are to be replicated by blacks competing with whites. What could be more racist? And what better way to separate the races than by forcing blacks into competition with whites on terms assuring ultimate inferiority and division of life styles?

The apparition of Negro advancement comes forth by the actual bestowal of equality, and the fact of great strides toward equality serves to justify White America's mirage of improved relations between the two races. Just as the Christian faith sanctified enslavement and Darwinism blessed Negro inferiority following Emancipation, so too today, the enforcement of equality through Constitutional guarantees justifies dispensing with the Negro. Moreover, White America obtains a similar degree of self-righteousness from many social scientists just as the ideologues of yesterday buttressed the myths of racism through scholarly confirmation.

The Position of Sociology

Sociologists profess emphatic concern for the Negro, yet, generally speaking,

espouse theories supposedly obviating the necessity of racism but which, in fact, enhance the white myth of racism. Thoroughly convinced of no biological inferiority and imbued with an intense respect for all persons by expounding theories firmly committed to equality, most sociologists, nonetheless, dispense with the Negro by conjuring inevitable social realities *inherent within social forces.* The most dominant and popular contemporary viewpoints in sociological writings blame external factors for affecting Negro-white relations; responsibility is established within particular external social forces or processes bearing their own racial imperatives.

Industrialization and urbanization are processes inevitably leading to parity among all races; they bring with them assurances of people made equal because they operate, as the Constitution itself, regardless of race. Persons must be judged by what they can do rather than by racial qualities, just as the Supreme Court now rules the law to be equal apart from color. Talcott Parsons, for example, maintains that "the time is ripe for a major advance. The broad tendency of modern society, one in which America has played a rather special role, has been egalitarian in the sense of institutionalizing the basic rights of citizenship . . . so that the universalistic norms of the society have applied more and more widely."[17] A society modernizing into an industrial, urban nation guarantees the ultimate realization of equality.

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[16] Clark, *The Negro in Turmoil,* in THE NEGRO CHALLENGE TO THE BUSINESS COMMUNITY, *supra* note 11, at 64.

[17] Parsons, *Full Citizenship for the Negro American? A Sociological Problem,* 94 DAEDALUS 1038-39 (1965). "Because of the demand for

Migration, Philip Hauser assures us, must take its own course until it leads ultimately to parity among the races: the Negro is but another migrant who enters the city for assimilation, just as any other minority, into mainstream America.[18]

Economic exploitation prevails as a mere reflection, we are told by the class-conscious scholar, of capitalism's stratification wherein the lower classes must be imbued with racism to turn upon one another rather than upon the ruling elite.[19]

Then there are two recent sociological pronouncements which must be declared blatantly anti-Negro in their formulations. The advocates of family disruption insist that family life among Negroes is *the* fundamental shortcoming for ultimate acceptance; the disintegration of the family organization as an external life condition within the *black* community prevents integration through equality.[20] Since the prejudice of the family perspective has been so well established, it is not necessary to elaborate.[21]

What seldom receives criticism, however, is a much more serious denial of the Negro's abuse in White America, even though the orientation is well known and widely acclaimed, namely, relative deprivation.

> Thus after twenty years [*i.e.*, from the 1940's to the present] of progress, particularly in certain areas, the Negro is nevertheless considerably more frustrated today than he was at the beginning of this period of change because, while his absolute standard has been going up, his aspiration level has been rising much faster. His relative deprivation, the difference between what he has and what he expects to have, and what he thinks is his right to have, is now probably greater than at any other time in American history.[22]

The notion is widespread that rapid, objective accomplishments become the prime causes of spreading Negro discontent, that in proclaiming to protest against the snails' pace of their progress Negroes are misguided since advancement over the postwar years amounts to a virtual revolution.

The facts are distinctly and acutely otherwise: the supposed advancements in education, housing, income, integration,

labor in an expanding industrial society, men can no longer be evaluated on the basis of their racial identity." E. F. FRAZIER, THE NEGRO IN THE UNITED STATES 701 (2d ed. 1957).
18 "[A] demographic factor, internal migration, may be considered *the major factor in opening the door to integration.*" Hauser, *Demographic Factors in the Integration of the Negro,* 94 DAEDALUS 862 (1965) (emphasis added).
19 *E.g.,* O. C. COX, CASTE, CLASS, AND RACE: A STUDY IN SOCIAL DYNAMICS (1948).
20 *See, e.g., The Moynihan Report, supra* note 7; Moynihan, *Employment, Income, and the Ordeal of the Negro Family,* 94 DAEDALUS 745 (1965); Lincoln, *The Absent Father Haunts the Negro Family,* N.Y. Times, Nov. 28, 1965, § 6 (Magazine), at 60.
21 For probably the best critique see Ryan,

Savage Discovery: The Moynihan Report, 201 THE NATION 380 (Nov. 22, 1965). *See also* A. BILLINGSLEY, BLACK FAMILIES IN WHITE AMERICA (1968). For a most inadequate defense amounting to a whitewash-examination of the origins of the Moynihan family thesis, see THE MOYNIHAN REPORT AND THE POLITICS OF CONTROVERSY (L. Rainwater & W. L. Yancey eds. 1967).
22 Pettigrew, *White-Negro Confrontations,* in THE NEGRO CHALLENGE TO THE BUSINESS COMMUNITY, *supra* note 11, at 41. *See also* T. F. PETTIGREW, A PROFILE OF THE NEGRO AMERICAN (1964).

medical services, etc., are not supported; the Negro life situation deteriorates. Data to substantiate this statement cannot be presented here because of limited space, but the *Kerner Report* clearly shows the deterioration; my own detailed investigation of each area of erstwhile progress clearly shows the opposite;[23] studies of Negro riots clearly reveal uprisings occur not only in the most depressed housing areas, but in sections of the city where the black people experienced lower living standards.[24] Contrary to the claim put forward by relative deprivationists that the middle class is in the vanguard of racial strife, the *Kerner Report* presents the black middle class as the reactionary element: "high levels of education and income not only prevent rioting but are more likely to lead to active, responsible opposition to rioting."[25]

The theory of relative deprivation simply verbalizes, in scholarly fashion, what Southern racists have long expounded concerning black inferiority and white superiority. Ray Stannard Baker encountered, during his tour of the South at the turn of the century, remarks bearing more than just a casual resemblance to the relative deprivation explanation of black discontent: "If you educate the Negroes they won't stay where they belong; and you must consider them as a race," a Montgomery, Alabama lawyer told Baker, "because if you let a few rise it makes the others discontented."[26] Compare this to the statement by Leonard Broom and Norval Glenn: "With improved education come higher aspirations and increased discontent with inferior social status. . . . [E]ducation leads to unrest and troublesome ambitions."[27]

The major premises of relative deprivationists and Southern racists are the same. Both treat Negro demands as merely outcries of previous "gains." *There can be no factual justification for wants and fears.* Through this error in reasoning, the relative deprivation perspective not only distorts reality by supposing major progress, but provides a racist rationale for refusing further changes as well. White America can declare, in good faith, that progress toward bettering the lot of Negroes in the aftermath of riots is absolutely self-defeating; amelioration simply brings rewards to the violent Negro and increases the level of frustration so that Negroes would then insist upon more rather than being grateful for the assistance.

Both perspectives refuse to credit the Negro with consciousness; neither can imagine the undercurrent of bitterness and hostility among Negroes throughout the *history* of this nation. The Southerner's view of a happy-go-lucky, unfettered, sensate, uninhibited Negro without a care in the world has its equivalent in the relativ-

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23 S. M. WILLHELM, WHO NEEDS THE NEGRO? ch. 5 (1970).
24 For one of the best, see the study of Cleveland's riot by Walter Williams, *Cleveland's Crisis Ghetto*, TRANS-ACTION, Sept. 1967, at 33. *See also* the empirical data of the "typical" Negro rioter presented by the Kerner Commission RE-PORT 128-29.
25 REPORT 132.

26 R. S. BAKER, FOLLOWING THE COLOR LINE 85 (1908).
27 L. BROOM & N. D. GLENN, TRANFORMATION OF THE NEGRO AMERICAN 102-03 (1966).

ist's notion of the Negro suddenly breaking out of a docile acceptance of a subordinate position. Both express amazement and shock: the Southerner is astounded to learn of outrageous conduct from "his" Negroes much as the supporter of relative deprivation sees intense black consciousness for a rather special quality in the "Revolt of '63." For the Negro to live each day is a reminder of wrongs that must be borne and of feelings that must be suppressed.[28] There is no unique phenomenon—to be a Negro is to be aware of one's own inferiority in the eyes of White America; the very system White America perpetuates for subjugating Negroes is, at the same time, a major stimulus for creating awareness. If the Negro supposedly lacked the aspirations presently ascribed to him, what justifies legislation outlawing the right of slaves to be taught reading and writing, the opportunity to become members of the Christian faith, the privilege to establish voluntary organizations, and so forth? There would have been no need for legal restrictions and constant white vigilance if the Negro were passive and content in bondage. Whites passed racial laws precisely because Negroes sought then what many seek today: opportunities to learn how to read and write, the chance to own property, equality before the law, etc. My own examination clearly shows that Negro aspirations have not, on the whole, departed from but are rather affirmations of the past. From the nation's very founding, during the Revolutionary War, Negroes called upon whites to abide by the precepts of life, liberty, and the pursuit of happiness.

The absence of a historical perspective by relative deprivationists leads to a fallacy common to the family thesis, namely, that the Negro himself is blamed. The Negro supposedly phantoms an inner sense of deprivation when the external world alters drastically to accommodate him. Though the advocates themselves do not always subscribe to their own notions of rapid gains, they nonetheless insist that Negroes are exasperated because of marked gains.[29]

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[28] See W. H. GRIER & P. M. COBBS, BLACK RAGE (1968).

[29] Even though the factual state fails to support the insistence of Negro restiveness springing forth from vast improvements to unleash still greater desires for more drastic gains, the advocates disregard not only the virtual absence of evidence for their contention but also *their very own* assessment of Negro advancement. It would not seem unreasonable to expect proponents of relative deprivation to convince at least themselves of rapid gains for American Negroes after giving emphatic declarations to others of the "marked" achievements responsible for the discontented Negro. It would seem they would subscribe to their own thesis. But, alas, such could not be. Indeed, there is the widespread inclination to insert a disclaimer to any thought of rapid gains; the adherer to the approach quickly disassociates himself from any possible interpretation that *he* believes the Negro to have made great amounts of progress. This is done in spite of page after page setting forth the advancement postulate. Thus, for all his efforts to bring out reams of data in an attempt to sustain rising expectations derived from substantial acquisitions in a relatively short period of time, Thomas F. Pettigrew inexplicably expounds, "The hard truth is that the Negro's recent progress does not begin to close *the gap between the two races.*" T. F. PETTIGREW, A PROFILE OF THE NEGRO AMERICAN 187 (1964) (emphasis added). And as a consequence, he explains, "in each interrelated realm—health, employment, business, income, housing, voting, and education—the absolute gains of the 1950's pale when contrasted

To place the blame for discontentment upon the Negro minority, while simultaneously ignoring the white society of which this minority is a part is to deny reality and indict an already overly abused

people. The perversion contributes to Negro misery and helps to absolve White America—particularly sociologists—of any guilt. Willfully or otherwise, advocates of

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with current white standards." *Id.* at 191. And this is just the point! The measure for any achievement is not what one has relative to one's own past as the source for dissatisfaction, but rather the resources one has at his disposal to interact with others. As one's own position improves over a period of time but simultaneously suffers set-backs to deter the social relationships one intended to undertake all along, the person can hardly be accused of self-instilled frustration. It was the gap *between* the races which provided the initial incentive to challenge the social order of White America by Black America. Now that, as Pettigrew acknowledges, the gap expands, one should expect the expansion of protest as a direct result.

Still, others follow the same procedure of denying the very advancements they take for explaining the malcontent among Negroes over the last decade. Pierre van den Berghe admits in one sentence that "the objective situation has improved, to be sure, *but the change is impressive only by conservative standards,*" but then proceeds to overlook this qualified statement by saying, in the very next sentence:

Recent developments seem to highlight two points. First, with the "revolution of rising expectations" on the part of Negro Americans, the gap between reality and aspirations has increased in spite of progress; consequently, the level of racial conflict, of frustration, and alienation has risen in the past few years.

P. VAN DEN BERGHE, RACE AND RACISM 92-93 (1967) (emphasis added). Yet the viewpoints of the Negro who makes the same observation—"the change is impressive only by conservative standards"—to which van den Berghe so openly admits in order to avoid an association with conservative White America, are immediately taken for certain proof of relative deprivation. Mr. van den Berghe will not allow the Negro to speak in the idiom that he himself feels so free to exclaim. Neither the Negro nor van den Berghe wish to indicate the slightest notion of false progress by insisting Negroes have made decisive

gains in post-World War II America. Yet should the Negro declare a slow pace, van den Berghe and his school quickly dismiss the thought and substitute the ill-founded hypothesis of relative deprivation. The Negro is perceived in a state of frustration, but van den Berghe himself advances "objective" analysis and data.

Seymour Martin Lipset, a political sociologist, expounds the thesis when he explains:

What you are getting in the big cities is a situation quite similar to that in newly independent countries—where the situation of people, in this case Negroes, has not changed enough to match their expectations. Revolutions tend to come when things are getting better—but not fast enough.

Can the Big Cities Ever Come Back?, U.S. NEWS & WORLD REP., Sept. 4, 1967, at 30. The unsigned article containing this quote by Lipset points out the utter absence of accomplishment in the following example:

In New York City, which has 1.25 million Negroes, welfare rolls have more than doubled since 1958. Negroes and Puerto Ricans make up more than 80 percent of all welfare recipients.

Today . . . a federal estimate [dealing with Watts of Los Angeles] is that one out of three persons in the riot area remains jobless or underemployed. Negro spokesmen say that median income is *down*, while relief rolls have gone *up* 34 percent—largely because organizations have been created to inform people of their "welfare rights."

Recently, a congressional hearing on open housing was told that employment in U.S. manufacturing has increased by nearly 2 million jobs since 1961—but almost all of the increase has been outside areas of Negro concentration.

The article sums up the situation in this way:

This is becoming clear:

The crisis of the big cities, coming to a head in recent years, continues without letup. And no real solution appears in the immediate future.

relative deprivation promote racism by the elaboration of a theory which holds the Negro accountable for the expanding unrest among black Americans.

All the viewpoints we have mentioned here emphatically argue for an external compulsion *acting upon the Negro* without, save for the economic exploitation contention, any hint of racism; indeed, racism will simply fade as a by-product according to each train of thought rather than being a basis for White America's relationship to Negroes. Every "explanation" takes for granted that equality will be achieved as

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Id. at 29-31 (emphasis added).
And where do 75 percent of America's Negroes live?—in cities!

J. W. Vander Zanden follows the identical pattern. He insists that "the Negro protest is not so much a product of despair as a protest fed by rising expectations," only to deny any such possibility in an immediately-following disclaimer: "Yet Negroes face formidable obstacles and frustrating barriers in realizing their aspirations. If Negroes are to satisfy their expectations there must be a marked closing of the gap between Negros and whites as well as large absolute gains. . . ." J. W. VANDER ZANDEN, AMERICAN MINORITY RELATIONS 415 (2d ed. 1966). It is simply not possible to describe the Negro protest "fed by rising expectations" more so than "despair" and then immediately inform us of the "formidable obstacles and frustrating barriers." Could it not just be possible that black frustrations come from the "frustrating barriers"?

The declaration of sustained gains is a premonition resulting from a most improper adherence, on the part of the social scientist, to an unsubstantiated theory of relative deprivation. We discover the strange contradiction of the relative deprivationists: Negroes make gains without any gains. But the "gains" account for "Negro restiveness" when all along, as admitted by the proponents of relative deprivation, there have been no outstanding gains for the dissident black within American society during the postwar years.

the "natural" and "inevitable" outcome of its specific rationale, or, as in the case of the family thesis, equality will be attained by correcting an obvious "wrong" in Negro life. How strange, indeed, that contemporary scholarly discourses should "just happen" to lead to "equality"! This merely repeats Christian thought which "just happened" to lead to the liquidation of Indians and the enslavement of Negroes; of evolutionary thought which "just happened" to lead to the liquidation of Indians and the segregation of Negroes. The latest scholarly formulations present social thoughts invariably leading to equality for Negroes at just the moment White America dooms the Negro to equality before the law!

American Racism: An Inner Compulsion

The sustenance of racism in America is racism itself, nourished to the full extent possible by the economic resources existing at any given moment. It is an *inner* compulsion, not an external obligation. Racism in combination with economic motives constitutes a *value* system that dominates the nation's hold over a colored population. The nation's pattern of race relations flows out of this value system and cannot be considered but a mere reflection or continuation of one kind or another force ordained first by one kind and then another Superior Entity. Throughout its history, White America adjusts its expression of racism to accord with its economic imperatives and modifies its myths of racism to take into account the shifting economic circumstances. That is to say, racism remains a persistent *value* expression depending upon economic opportunities; White America generates a new ideology to sanc-

tion any fundamental alterations in race relations growing out of basic economic modifications. It has been the fate of ideologues, for the most part, to compose "analyses" in keeping with the myths of racism rather than to expose White America's racial motivation. By addressing "explanations" to the imageries of racism rather than exposing racism, sociologists embrace the very racism they pretend to explain and thus formulate intellectualized justifications for White America.

Controlling the Negro: The Reservation Revisited

The nation, with a vigorous tradition of violence, now resorts to a police state, first to contain black-skinned people into isolation away from white contact, and, second, to restrain any Negro from breaking out of the reservation in the event of violence. Police brutality becomes, at most, a secondary abuse for the oppressed ghetto Negro; a police force assigned to preserve "law and order" remains fundamentally racist even in the total absence of brutality because it is charged with the responsibility to uphold the racial separation of all Americans. J. Edgar Hoover unequivocally insisted, during a radio interview conducted in mid-November 1968, upon "vigorous law enforcement" for handling black resistance:

Q—Do you feel the nation is in trouble? A—I think very definitely it is.

Q—In what respect? A—In respect that it has these conditions existing—these riots, these lootings and the burning and arson of buildings, stores, in various parts of the country that should not be allowed to prevail.

Q—What is the answer? A—The answer is vigorous law enforcement.

Q—That is the *only* answer? A—That is the *only* answer.[30]

No amount of proper etiquette on the part of the police could nullify the basic racist machinery which imposes "law and order" according to Constitutional equality. The law itself comes into disrepute among Negroes with or without police brutality accompanying enforcement. "There is no point in telling Negroes to obey the law," former Senator Robert F. Kennedy explained in the aftermath of the Watts riot, since many Negroes have reason to insist "the law is the enemy." For "the rioters belong to no world but their own. It is a world where the police can arrive in five minutes but it may take months to get the building code inspector in."[31]

Is Justice for the Negro Possible?

In the past, the Negro conceived his survival to be a matter of adjusting to changing economic conditions or forcing White America to bestow exclusively white privileges on blacks. Today, however, a growing number of Negroes stand in the vanguard, searching for solutions not only to racism but also joblessness with the intrusion of technological displacement. As the Negro perceives the nation's unwillingness to undertake the task to *compensate* the dispossessed black laborer, he embarks upon a more radical program: increasingly, he advocates "economic justice" to restore all America. Just at the moment White

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[30] Buffalo Evening News, Nov. 16, 1968, at 5, col. 1 (emphasis added).
[31] N.Y. Times, Feb. 10, 1968, at 1, col. 1.

America calls for *equality*, Black America demands *justice* to accord with Negro aspirations. Many Negroes want to develop into a creative minority endeavoring to found a radically different society for both white and black. Martin Luther King, for example, implored:

> Let us . . . not think of our movement as one that seeks to integrate the Negro into all the existing values of American society. Let us be those creative dissenters who will call our beloved nation to a higher destiny, to a new plateau of compassion, to a more noble expression of humaneness.
>
> We [Negroes] are superbly equipped to do this. We have been seared in the flames of suffering. We have known the agony of being the underdog. We have learned from our have-not status that it profits a nation little to gain the whole world of means and lose the end, its own soul. We must have a passion for peace born out of wretchedness and the misery of war. Giving our ultimate allegiance *to the empire of justice*, we must be that colony of dissenters seeking to imbue our nation with the ideals of a higher and nobler order. So in dealing with our particular dilemma, we will challenge the nation to deal with its larger dilemma.
>
> This is the challenge. If we will dare to meet it honestly, historians in future years will have to say there lived a great people —a black people—who bore their burdens of oppression in the heat of many days and who, through tenacity and creative commitment, injected new meaning into the veins of American life.[32]

It is because equality according to white standards means the dismissal of blacks

within American society that the radical Negro insists upon "justice." By demanding justice, revolutionary blacks are able to formulate their own alternatives to remake rather than accept American values. The Negro leader, from Martin Luther King to Stokely Carmichael, shifts from the role of a mere critic to a radical figure —from an advocate of reform to a proponent of revolution—in seizing upon justice. Where he once contemplated the possibility of parity with whites by amending America to accommodate the Negro, he must now proclaim an inevitable necessity to alter the very fabric of White America; where he once sought acceptance as an equal, he must now overturn all America to win his sense of justice; where he could be content with integration, he must now express contempt; instead of being the subject of change, he must incite massive change. As White America implements economic repudiation of Negroes, Black America responds in kind, insisting upon a *new* America. There is something wrong *with* the system itself, not something *within* the system. The entire system is so corrupt in so many ways that it cannot be cured but rather must be discarded.[33]

Conclusion

We now bear witness to a White America exhibiting a willingness to extend equality to the fullest extent possible within the limits of its economic values: the nation grants full equality to any Negro made irrelevant by the ultimate success of its economic motive. White America is most

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[32] M. L. KING, JR., WHERE DO WE GO FROM HERE: CHAOS OR COMMUNITY? 133-34 (1967) (emphasis added).

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[33] For a discussion of this point, see S. M. WILLHELM, *supra* note 23, at ch. 7.

anxious to deliver the long-delayed promise of judging without regard to race now that the Negro looms on the horizon of becoming a worthless object. As the Negro becomes nonexistent in the nation's work force, a defunct human being stripped of intrinsic economic utility, he will be accorded every conceivable right to equality imaginable to White America, since there is no meaning in clothing a nonentity in the wraps of equality. But wherever the Negro remains economically viable—as a purchaser of homes in all-white neighborhoods; an employable applicant for the better job openings; a Christian in search of religious consolence; a qualified candidate for military promotion, job training for union-controlled employment, loans, insurance coverage; and so on—then whites are most likely to resort to discrimination and/or avoidance on the basis of race. Upon the failure of economic processes to exclude blacks from white domain, then, White America oftentimes relies upon its traditional, ever-present racism to dismiss the Negro somehow managing to survive in spite of the economic hardships intended by extending equality. Racism is the last resort following economic eradication; it is subtle, since proper etiquette must be observed to make racism as unapparent as possible. The Negro rebounds to the nation's mockery of democracy by raising the demand for justice.

The Negro embarks upon a most tedious future; his renewed vigor to press for justice thins his ranks still further of both whites and blacks. The prospect of bidding for a reconstructed society based upon the premise of justice for all test still further the Negro and white's courage to remain

in the front lines not merely of a civil rights struggle, but also an economic revolution. The appeal to action by issuing revolutionary pronouncements to instill the drama of a coming age, so important for solidifying a dedicated mass movement, instills, simultaneously, fright in the hearts of persons within hearing distance. At once, the revolutionary cry generates determination among both adherents and protagonists. It is for this reason that Martin Luther King projected a revolution to expand his following but extended immediately the hand of peace in proposing nonviolence to pacify intensified anxiety. The intrusion of "black power" slogans upsets the delicate balance any leader of a "powerless" movement who desires to avoid armed clashes must promote while demanding a revolution.

It is the double curse flung upon the Negro by White America to judge a man's competency against the performance of machines and a man by the color of his skin. Paul Goodman observes concerning the first affliction that "the plain truth is that at present very many of us are useless, not needed, rationally unemployable. It is in this paradoxical atmosphere [of being employed yet not really needed] that . . . [many] persons grow up. It looks busy and expansive, but it is rationally at a stalemate."[34] Yet, it is just as plain that many Negroes are neither needed nor employed. Clearly, then, White America disposes of the Negro because of both racial and economic incentives. Few individuals grasp and appreciate the black experience; many

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[34] P. GOODMAN, GROWING UP ABSURD 30-31 (1956).

who perceive the economic plight fail to comprehend the reality of race. Moreover, the Negro seeking a broadly conceived coalition fails to understand the extent of unconcern among the very people he hopefully anticipates will become his sympathetic allies. Most whites—and especially the all-important liberal intellectual congery—deny the arrival of automation except for those captains of industry heading the corporations most responsible for' the design and implementation of the new technology—and the latter most often cannot conceive of what it means to be black in White America, are isolated from the race issue, and, therefore, refrain from an activist role.

In sum, America is a nation of white people marking time for a black people. After centuries of abuse, the white majority repudiates the black minority for the very qualities for which it must accept blame: poverty, ignorance, technical incompetence, family disruption, filth, crime, disease, substandard housing, etc. While assuring majestic prospects for acceptance, the nation removes the basic opportunities for achievement by enforcing the equality principle. Now that insurrections burst forth, whites reciprocate with more massive violence until resisting Negroes are fully suppressed. The white strategy reflects the nation's earlier history when "the ingenious plan evolved of first maddening the Indians into war, and then falling upon them with exterminating punishment," all along

branding the latter with the charge of aggression.[35]

The bonds of unity collapsed in mid-nineteenth-century America when the economic and racial imperatives dictated the transition of the Negro from slavery into serfdom; the nation came to terms through a civil war. Disunity now afflicts mid-twentieth century America as economic and racial imperatives necessitate Negro removal to an invisible existence upon the ghettoized reservation. White America's newest technological configuration provides a reformulated "manifest Destiny"—to see to it that economic efficiency receives full expression in the form of automatic production and mechanized agriculture. The enthronement of white by a virtuous commitment to equality could not have been successful without an economy that makes labor less and less essential to production.

It is because the Negro moves more decisively in the direction of becoming an Indian ward at best that great despair spreads throughout the black ghetto. The ghetto riot in a carnival mood of gaiety is expressive conduct by a collectivity in the initial stage of being doomed to an unwanted reservation existence; in time, it may very well turn, as was true for the American Indian, into a concerted effort to engage in warfare against White America.

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[35] H. H. JACKSON, A CENTURY OF DISHONOR 40 (1885).