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ESSAYS

A COMPARATIVE PERSPECTIVE ON THE UNITED STATES AND CHINESE CONSTITUTIONS

PU ZENGYUAN*

INTRODUCTION

The Chinese and the United States social, economic and political systems are radically different. The same is true of their constitutions. China is a socialist country; the Chinese Constitution is of the socialist type. The United States is a capitalist country; the United States Constitution is of the capitalist type. Formerly, some people asserted that different types of constitutions are incomparable with each other. Now, perhaps no one would maintain such an attitude. Constitutions do not emerge in a vacuum. Whether of a same type, of a same country, or even of different periods of one country, constitutions are all offspring of certain specific historical conditions.

We should not neglect the historical significance and the important role of capitalist constitutions; neither should we deny the historical ties between capitalist and socialist constitutions. Socialist constitutions make use of those progressive elements of capitalist democracy manifested in the constitutions, such as equality before the law, people's sovereignty, and universal suffrage, and transform them to serve socialism.

* Research Professor and Deputy Director, Institute of Law, Shanghai Academy of Social Sciences. In the fall of 1987, I attended a conference on Foreign Perspectives on the United States Constitution in commemoration of its bicentennial sponsored by the American Council of Learned Societies. I was a visiting scholar affiliated with the law school of the College of William and Mary studying American constitutional law with the assistance of Professors Nichol, Ledbetter, Devins and others. This essay is based on a speech delivered at the law school on April 18, 1988. Because I am not in a position to present a comprehensive comparison of the United States and Chinese Constitutions, I just put forth several points for consideration and hope to learn something more from my American friends.

The Draft of the Chinese Constitution, while summing up the experience of Chinese revolution and construction as its main source, also drew on international experience, including two different types of constitutions. As students of constitutional law, therefore, we should not only study the constitution of our own country, but also make comparative studies of both similar and different types of constitutions. The United States Constitution, the first written constitution in the world, has two hundred years of history. These unique features are worth notice. The United States has long enjoyed political stability to a remarkable degree; and an important reason for this is the United States Constitution. No doubt, students of comparative constitutional law must study the United States Constitution conscientiously.

DEMOCRATIC CHARACTER OF THE CONSTITUTION

The constitution is inseparable from democracy. It is legalized and institutionalized democracy. Different countries, however, have different democratic systems. The United States Constitution reflects the democratic system of the uprising bourgeoisie after victories over feudal autocracy and colonial rule. The American people all believe their country is a democratic one, but strangely no such word as "democracy" appears in the United States Constitution. It only provides for "a Republican Form of Government."¹ The preamble to the Constitution, however, begins: "We the People of the United States," and states that the people "do ordain and establish this Constitution."²

American scholars have different views with respect to the democratic character of the United States Constitution. Using the records of the Treasury Department, the famous historian Charles A. Beard analyzed in detail the economic interests of the fifty-five delegates to the Philadelphia Convention. He concluded that "four groups of personalty interests [were] adversely affected under the Articles of Confederation: money, public securities, manufactures, and trade and shipping."³ According to Beard:

1. U.S. CONST. art. IV, § 4.

2. *Id.* preamble.

3. C. BEARD, AN ECONOMIC INTERPRETATION OF THE CONSTITUTION OF THE UNITED STATES 324 (1986).

In the ratification of the Constitution, about three-fourths of the adult males failed to vote on the question, having abstained from the elections at which delegates to the state conventions were chosen, either on account of their indifference or their disfranchisement by property qualifications. The Constitution was ratified by a vote of probably not more than one-sixth of the adult males. . . .⁴

Beard thus concluded: "The Constitution was not created by 'the whole people'. . . but was the work of a consolidated group. . . ."⁵

The current Constitution of the People's Republic of China was adopted in 1982. Although labelled a revised constitution, it is actually a newly drafted one. It reflects the new development of socialist democracy. For the first time, the new Constitution provides that the building of a high level of democracy is one of the basic tasks of the state.

In contrast to the drafting and ratification of the United States Constitution, the process of revising the Chinese Constitution was democratic. More than two years before the new Constitution was adopted, a Committee for Revision of the Constitution was established.⁶ It solicited opinions from all localities, departments and quarters. After conscientious discussion and revision, the Standing Committee of the National People's Congress made public the Draft Constitution and submitted it to the people of all nationalities in the country for discussion. About eighty percent of the adult citizens took part in the nationwide discussion. Opinions and proposals of all kinds were put forward. After the public debate, the Committee for Revision of the Constitution further revised the Draft and submitted it to the National People's Congress for consideration.⁷ After still further discussion and revision of the Draft,

4. *Id.* at 325.

5. *Id.* In addition to the Constitution's limited popular ratification, the Philadelphia Convention was convened under absolute secrecy. Most participants of an international conference I attended in 1987 thought that the secret nature rendered the process inherently undemocratic although it was not challenged or resented at the time.

6. The Committee included 106 members from throughout the country.

7. The National People's Congress "is the highest organ of state power." CONST. OF THE PEOPLE'S REPUBLIC OF CHINA art. 57 (1982) (Foreign Languages Press trans. 1983). It is "composed of deputies elected by the provinces, autonomous regions and municipalities directly under the Central Government, and by the armed forces. All the minority nationali-

the new Constitution was formally promulgated for implementation on December 4, 1982.

Therefore, when comparing the United States and Chinese Constitutions from the democratic point of view, the Chinese Constitution has superiority. The problem is that China has not brought the superiority of socialist democracy into full play. After adopting the new Constitution, China has not paid enough attention to promoting and implementing it into China's social, political, economic, and cultural life. In 1986, China implemented a five-year program of spreading knowledge of laws among citizens, of which the Constitution is an important part. It has brought about positive results. The program urges the leading cadres at various levels to set a good example to the people in studying laws. I personally offered a course on the Constitution to the Party and government officials of the Shanghai Municipality. Yet it remains a tremendous task for the leading cadres, as well as the broad masses, to cultivate and strengthen their understanding of the Constitution, their sense of democracy and legality, and their awareness as socialist citizens in their daily lives.

The United States Constitution enjoys more widespread recognition among the American people. Many events in daily life of the American community often have something to do with the Constitution, and many cases brought before the courts involve constitutional issues. Since my arrival in the United States in September 1987, President Reagan nominated three judges to fill a vacancy on the Supreme Court. These nominations caused wide discussion and heated debate throughout the country. In addition, the recent presidential campaign focused on several constitutional issues. Also public debate over such problems as racial discrimination, abortion, and drug testing is commonplace, and newspapers and television programs often report decisions of the Supreme Court and the inferior courts. The wide publicity given to issues having a close connection with the Constitution helps, to some extent, to enhance awareness of the Constitution and the constitutional rights of citizens. Despite the fact that not all people really understand the specific provisions of the Constitution nor act consciously accord-

ties are entitled to appropriate representation." *Id.* art. 59. As a result, the National People's Congress represents the interests of all nationalities in China.

ing to the Constitution, such daily publicity of mass media plays a considerable role in upholding the democratic system of the Constitution.

In October 1987, the Thirteenth National Congress of the Communist Party of China, while discussing reform of the political structure, outlined measures of improving socialist democracy. General Secretary Zhao's report delivered at the Congress urged leaders "to make public the activities of the leading bodies, letting the people know about important events and discuss important issues."⁸ The report called for "wider coverage of the activities of the government and the Party through all forms of modern mass media, to give scope to the supervisory role of public opinion."⁹

Steps already have been taken to meet this goal. For example, the 1988 annual session of the National People's Congress impressed observers with its open and lively debates on a wide range of issues in a manner never recorded in the history of the People's Republic. Many of the Congress' proceedings were broadcast on national television, and foreign journalists were allowed into deputies' panel discussions. In his report to the Congress, Acting Premier Li Peng stressed the importance of building socialist democracy and elaborated on the "system of democratic consultation and dialogue."¹⁰ I believe that China is taking practical steps to improve socialist democracy and that socialist democracy will work more effectively and continue to develop.

PRECISION OF THE CONCEPT OF THE CONSTITUTION

What is the constitution? In China, the meaning is clear. Most textbooks of constitutional law carry such a definition: The constitution is the fundamental law of a country that stipulates the basic principles of the social system¹¹ and the state system.¹² The preamble of the new Constitution of the People's Republic of China

8. Zhao, *Advance Along the Road of Socialism With Chinese Characteristics*, reprinted in 30 BEIJING REV., Nov. 9-15, 1987, at 41. Zhao delivered his report at the 13th National Congress of the Communist Party of China on October 25, 1987.

9. *Id.*

10. Li, *Report on the Work of the Government*, in THE FIRST SESSION OF THE SEVENTH NATIONAL PEOPLE'S CONGRESS OF THE PEOPLE'S REPUBLIC OF CHINA 48 (Foreign Languages Press trans. 1988). Li delivered his report on March 25, 1988.

11. The social system mainly denotes the economic system.

12. The state system primarily denotes the nature of the state, the political system, the fundamental rights and duties of citizens, and the structure of the state.

clearly states: "This Constitution affirms the achievements of the struggles of the Chinese people of all nationalities and defines the basic system and basic tasks of the state in legal form; it is the fundamental law of the state. . . ."¹³

In the United States, generally speaking, textbooks do not define the term "constitution." Also, no precise agreement on what is meant by the word constitution exists. Some scholars talk of a "living constitution" or a "changing constitution." As a rule, the United States Constitution does not confine itself to the texts of articles and amendments. Some legal writers believe it includes the Declaration of Independence, political theories, conventions, traditions, practices and even historical and current social, political, and economic conditions.¹⁴ As to what should be included, no clear standard exists. Of course, one may insist on differentiating between the constitution and constitutional law; but, in a sense, this difference is only academic, especially considering the notion of a living constitution.¹⁵

One thing, however, is obvious: American constitutional law includes a vast amount of interpretation by the United States Supreme Court. Many scholars even contend that American constitutional law deals primarily with the exercise of the power of judicial review. Constitutional law textbooks devote significant attention to cases relating to judicial review. Also, many books on American constitutional law often begin with a chapter on judicial review. Both the United States Constitution and American constitutional law are inseparable from judicial review, and the constitutional interpretation of the Supreme Court constitutes an important part of the living constitution.

13. CONST. OF THE PEOPLE'S REPUBLIC OF CHINA preamble (1982) (Foreign Languages Press trans. 1983).

14. See, e.g., Stick, *He Doth Protest Too Much: Moderating Meese's Theory of Constitutional Interpretation*, 61 TUL. L. REV. 1079, 1079-80 (1987) ("One can define the Constitution as only the words ratified in 1788 along with all amendments, or one can include our broader political traditions: Supreme Court decisions, the Declaration of Independence, and the Gettysburg Address, as well as longstanding institutional accommodations between the executive branch and Congress.").

15. In Chinese, the words "constitution" and "constitutional law" usually have the same translation.

When exercising the power of judicial review, the Supreme Court does not depend entirely on the text of the Constitution, including its amendments. It also calls upon political theories, policies and the like as the basis for decision. The importance of judicial review actually exceeds that of the constitutional text. The ruling of the Supreme Court not only binds the parties of the case and all lower courts, but also influences society in general.

Because of the Supreme Court's constitutional interpretation, people's understanding today as to what the Constitution means may be different from the past. The Supreme Court also may reverse its former interpretations to adapt to new conditions. The Court's shifting stance on the problem of racial segregation provides a well-known example of its ability to change positions. In *Brown v. Board of Education*,¹⁶ the Supreme Court repudiated the "separate but equal" doctrine of *Plessy v. Ferguson*¹⁷ and declared that "separate but equal" had no place in the field of public education. What the Court deemed constitutional in *Plessy* became unconstitutional in *Brown*. This ruling affected the daily life of citizens and to a greater extent suggested new morality and practices. It accounts for the living constitution. What does a living constitution mean? Chief Justice Rehnquist wrote: "It is not an easy question to answer; the phrase 'living Constitution' has about it a teasing imprecision that makes it a coat of many colors."¹⁸ I must agree.

Although the United States Constitution is the first written constitution in the world, it shares the characteristics of an unwritten constitution. To understand the United States Constitution, an in-depth knowledge of the political history and social development of the country and the respective backgrounds of the constitutional cases is required. This is no easy task, especially for a foreign student.

With regard to this problem, the concept of the Chinese Constitution is clear.¹⁹ Yet as a whole, serious attention must be called

16. 347 U.S. 483 (1954).

17. 163 U.S. 537 (1896).

18. Rehnquist, *The Notion of a Living Constitution*, 54 TEX. L. REV. 693, 693 (1976).

19. The concept of the constitution is not so precise in the United States; it is a peculiarity of its own. Because it is a living constitution, a changing constitution, in a sense, it may attract the attention of people from different perspectives observing how it actually changes.

for to enhance recognition of the Constitution as the “fundamental law” and the “basic norm of conduct” of “[t]he people of all nationalities, all state organs, the armed forces, all political parties and public organizations and all enterprises and undertakings,”²⁰ and to cause it to be carried out in daily practices.

THE SUPREME AUTHORITY OF THE CONSTITUTION

At first glance, the United States and Chinese Constitutions have much in common. For example, the United States Constitution provides that it is “the supreme Law of the Land,”²¹ and the Chinese Constitution states that it “has supreme legal authority.”²² Yet, important differences remain.

In the United States, what is the constitution is not so clear. People may have different understandings. Consequently, the understanding of what is the supreme authority is not so clear either. The United States Constitution requires the President, Senators and Representatives, the members of state legislatures, and all federal and state executive and judicial officers, to take oaths to support the Constitution.²³ Owing to the different possible understandings of what the Constitution is, the results in practice may also be different. For example, the President may deem certain conduct to be a matter of presidential or executive privilege recognized by the Constitution, hence the supreme authority. Yet, the Supreme Court may rule to the contrary and the President must comply with the Court’s decision.²⁴ For another example, the United States Constitution makes no provision for political parties, but the two-party system actually plays a decisive role in the American political system. These features belong to the unwritten constitution; they also have supreme authority.

20. CONST. OF THE PEOPLE’S REPUBLIC OF CHINA preamble (1982) (Foreign Languages Press trans. 1983).

21. U.S. CONST. art. VI.

22. CONST. OF THE PEOPLE’S REPUBLIC OF CHINA preamble (1982) (Foreign Languages Press trans. 1983).

23. U.S. CONST. art. VI, cl. 3.

24. *See, e.g., United States v. Nixon*, 418 U.S. 683 (1974).

The Chinese Constitution suffers no similar difficulty. It emphasizes "the uniformity and dignity of the socialist legal system."²⁵ The Chinese Constitution provides that "all political parties . . . must abide by the Constitution."²⁶ This includes the Communist Party of China, the party in power. The new Party Constitution also requires that "[t]he Party must conduct its activities within the limits permitted by the Constitution and the laws of the state."²⁷

Despite its clear status at the summit of the Chinese legal system, certain conditions continue to hamper the supreme legal authority of the Constitution. One long-standing problem has been the lack of distinction between the functions of the Party and those of the government. In response to this problem, the Thirteenth National Congress of the Communist Party of China held that "the key to reforming the political structure is the separation of Party and government," and adopted a series of measures accordingly.²⁸ Other difficult tasks remain, such as the urgently needed laws for enforcing the Constitution, the enhancement of the citizens' awareness of law, and the imposition of necessary sanctions for violating the Constitution. All these problems affect the supreme legal authority of the Chinese Constitution. In this regard, both the Party Congress and the newly concluded session of the National People's Congress adopted measures to strengthen the socialist legal system.²⁹

SUPERVISION AND INTERPRETATION OF THE CONSTITUTION

The Chinese Constitution provides that both the National People's Congress and its Standing Committee supervise the enforcement of the Constitution.³⁰ The Standing Committee of the National People's Congress exercises the function and power of

25. CONST. OF THE PEOPLE'S REPUBLIC OF CHINA art. 5 (1982) (Foreign Languages Press trans. 1983).

26. *Id.*

27. CONST. OF THE COMMUNIST PARTY OF CHINA preamble (1982), reprinted in THE TWELFTH NATIONAL CONGRESS OF THE CPC 98 (Foreign Languages Press trans. 1982).

28. Zhao, *supra* note 8, at 37-39.

29. See Zhao, *supra* note 8, at 37-43; Li, *supra* note 10, at 48-51.

30. CONST. OF THE PEOPLE'S REPUBLIC OF CHINA arts. 62(2), 67(1) (1982) (Foreign Languages Press trans. 1983).

interpreting the Constitution.³¹ According to the reports of the Standing Committee of the National People's Congress, in recent years, in certain places and certain aspects, rather serious problems remain because the laws already enacted were not observed and enforced strictly. The strengthening of the supervision of the enforcement of the Constitution and laws is imperative. As for the interpretation of the Constitution, I have no knowledge of the Standing Committee of the National People's Congress making any interpretation of the Chinese Constitution.

The United States Constitution does not use the term "super-*vis*e." The text of the Constitution, including its amendments, contains no plain statement concerning who has the power to interpret the Constitution. The legislative, the executive, and the judicial branches of the national government each may have some interpretive authority. In fact, all public officials often must interpret the Constitution to follow their oaths to uphold the Constitution. The question becomes, in case of conflict, whose interpretation should prevail. The general conception is that though the articles of the Constitution contain no specific statement, the constitutional tradition is to accept the Supreme Court's interpretation as final authority.³² The Supreme Court may declare actions of the Congress or the President unconstitutional and thus null and void. Yet no explicit textual authority embodies the power of judicial review. It is an important feature of the unwritten constitution.

The United States Constitution needs interpretation because of the historical conditions under which it was adopted and the present circumstances under which it is currently in force. The Constitution is the offspring of the "Great Compromise" in the Philadelphia Convention and today continues to be a living constitution. The Constitution boasts simplicity, or brevity, and flexibility as its merits. However, these merits of brevity and flexibility result in the tremendous task of interpretation. The framers left some things unsaid, some things unclear, and some things to be said by

31. *Id.* art. 67(1). China's political system consists of people's congresses. The National People's Congress is the highest organ of state power. It meets in session once a year. Its permanent body is the Standing Committee of the National People's Congress, which usually meets every two months. *Id.* art. 57.

32. The doctrine of judicial review originated in *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803).

the later generations. The United States Constitution, then, depends on interpretations to adapt to the new conditions during these years and to make it a living constitution.

On the question of interpretation, the United States Constitution's unique character is connected with its political system and historical background. China's is entirely different. Of course, China cannot copy the American method. The Standing Committee of the National People's Congress' failure to exercise its power of constitutional interpretation leads one to ask why it has not exercised that power. Are all provisions of the Constitution so clear that there is no room or necessity for interpretation? This problem is worth pondering.

THE AMENDMENT OF THE CONSTITUTION

As the supreme law, a constitution should not only keep its stability, but also meet the demands of changing conditions in practice. Specific procedures for amendment are essential elements of any constitution. Both the United States³³ and the Chinese Constitutions³⁴ contain an article on amending the Constitution.

In the People's Republic of China, since its first Constitution of 1954, there have been three all-round revisions, in 1975, 1978, and 1982 respectively. In addition, the amendment of a single article or certain articles has occurred three times, including the latest amendment adopted on April 12, 1988.³⁵ In less than thirty years (1954-1982), China adopted four Constitutions, three of those in the last eight years (1975-1982). This fact inevitably has given birth to an impression that the changes have been too quick, too many, and the resulting Constitutions too unstable. China has undergone enormous changes, particularly through the disastrous period of the "Great Cultural Revolution."³⁶ The Constitution of 1975 was adopted during that period. The Constitution of 1978 was adopted immediately after the Cultural Revolution but failed to rectify the mistakes of that Revolution. These two Constitutions

33. U.S. CONST. art. V.

34. CONST. OF THE PEOPLE'S REPUBLIC OF CHINA art. 64 (1982) (Foreign Languages Press trans. 1983).

35. See *infra* note 41 and accompanying text.

36. A Chinese saying labels the Cultural Revolution as the period of "no law, no heaven."

contained not a single word about the procedure of amendment. The Constitution of 1982 maintains and develops the fundamental principles of the 1954 Constitution; and it meets the needs of China's socialist modernization in the new historical period. It is an excellent Constitution as compared with its predecessors, but is only five years old.

The United States Constitution has endured for two hundred years. There have been no others. Despite its long history and maintained remarkable stability, the Constitution has not been unchanged. In fact, it has experienced enormous changes. For instance, slavery, recognized by the Constitution,³⁷ has long been abolished.³⁸

The method of change is another matter. In the United States, the procedure for proposing and ratifying amendments is precisely stated in the Constitution. The procedure, however, makes the process of amendment rather difficult. In two hundred years, the United States Constitution has been amended only twenty-six times.³⁹ In 1972, Congress passed the twenty-seventh amendment, the equal rights amendment, and submitted it to the states for ratification. The number of ratifying states did not reach the required three-fourths even though Congress extended the ratification period.

Yet, Supreme Court interpretations also play an important role in "amending" the Constitution, and the Court need not follow the specific procedure for constitutional amendments. In fact, President Wilson once remarked that the Supreme Court resembles a constitutional convention in continuous session.⁴⁰ Furthermore,

37. See U.S. CONST. art. I, § 2 (requires apportionment of legislators on the basis of the "whole number of free persons" in each state and "three fifths of all other persons."); art. I, § 9 (prohibiting Congress from outlawing slave trade until 1808); art. IV, § 2, cl. 3 (requires states to "[deliver] up" escaped slaves and prohibits states from discharging them).

38. *Id.* amend. XIII, § 1. The democratic system of the United States differs in essence from that of China's. It has seen great development during the past two hundred years. The ratification of the fifteenth, nineteenth, twenty-third, twenty-fourth and twenty-sixth amendments to the United States Constitution successfully extended the right to vote to all citizens. The meaning of "We the People of the United States" in the preamble of the Constitution has been duly broadened to a vast extent.

39. Because the first ten amendments, the Bill of Rights, were a condition of certain states' ratification of the Constitution, strictly speaking, there are only sixteen amendments.

40. A. MILLER, *THE SUPREME COURT* 7 (1978).

congressional acts, presidential orders, and executive agreements contribute to amending the Constitution even though they may be inconsistent with the Constitution. Unless one recognizes these peculiar characteristics, one can hardly understand the nature of a living or changing constitution.

I believe that China should be cautious in amending its Constitution, yet ready to keep the Constitution abreast of the current conditions. People hope that China will have a stable Constitution. However, China is now in the primary stage of socialism. To accelerate and deepen reform, to give full scope to the Constitution in political, economic, and cultural life, and to enhance the awareness of the Constitution as the fundamental law of the state, it may be practically advisable to adopt amendments to the Constitution in respect of certain specific articles. The Chinese expressed several different opinions on this point until the Seventh National People's Congress held its First Session in March 1988. Although the announced agenda included no item of constitutional amendment, the Session ultimately adopted an amendment to the Constitution granting constitutional legitimacy to the private economy and the transfer of land-use right.⁴¹

CONCLUSION

I have made some preliminary comparisons on several aspects between the Chinese and the United States Constitutions. Of course, some problems are not isolated but interrelated with one another. The United States and Chinese Constitutions adapt to the basic conditions of their respective countries. The historical backgrounds of constitutional development and the political, economic and cultural conditions of the two countries are not only different but far removed. For example, the United States adopts the economic system of private ownership while China develops a planned commodity economy with public ownership playing the dominant role. In addition, the United States government operates on a system of separation of powers while China's government is based on the system of people's congresses. As I have said at the beginning, the Constitutions of our two countries belong to differ-

41. THE FIRST SESSION OF THE SEVENTH NATIONAL PEOPLE'S CONGRESS OF THE PEOPLE'S REPUBLIC OF CHINA 138 (Foreign Languages Press trans. 1988).

ent types. I attempted these comparisons in the light of comparative studies of constitutional law.

Studying the Chinese Constitution and ensuring its implementation are of the utmost importance to the strengthening of socialist democracy and legal system. China has sent scholars and students to the United States, but few have worked in the field of constitutional law. The study of Chinese constitutional law lags behind the times. The role American constitutional law played in developing American social and political systems is comparatively great. The United States Constitution has two hundred years of history. How can an eighteenth-century constitution meet the demands of the twentieth century? Many experiences, both positive and negative, are worth studying; and we may compare these experiences critically in the study of Chinese constitutional law.

The development of American constitutional law is a gradual process and not quite smooth. It took the United States nearly one hundred years after its independence to abolish slavery in the Constitution. It took the United States Supreme Court nearly another one hundred years to come to the decision in *Brown v. Board of Education*. Currently, the problem of racial equality has not yet been completely solved in social life. Other remaining problems require examination by American scholars and students of constitutional law.

In short, we Chinese scholars and students of constitutional law must grasp the basic conditions of our own country, adapt our work to the needs of modernization, reform, and the realities of the world, and discuss the merits and demerits, successes and failures, through comparative constitutional law studies to develop further a Chinese constitutional law with its own characteristics. This is a tremendous yet glorious task.