Music Education as Liberatory Practice: Exploring the Ideas of Milan Kundera

Randall Everett Allsup
Teachers College, Columbia University

What is a liberatory practice of music education? What is the framework for such a philosophy? Our investigation will begin with a scene from Milan Kundera’s *The Unbearable Lightness of Being*.

We will explore metaphors of lightness and weight from literary, musical, and philosophical points of view. Our examination will introduce various dialectics connected to lightness and weight, each with their discrete perspectives. A companion example, Ludwig van Beethoven’s String Quartet in F-Major, op. 135, no. 16, will lead to a discussion of freedom and responsibility and its effect on children and education.

A liberatory practice of music education is located within a hypothetical or critical stance, a philosophical position that asks subjects to name their world. From such a stance may arise a sense of hope or possibility, even freedom. How, for example, might we uncover the possible within fixed conditions? What teaching strategies can help students break through unreflective and ossified thinking? A liberatory practice depends upon an engagement, even a struggle, with one’s fate.

Weight as a metaphor for fate and responsibility is featured in Kundera’s novel. In 1968 Russian tanks have just invaded the Czech Republic and the protagonists, Tomas and Tereza, have escaped to Switzerland. In spite of the safety that Zurich offers her, Tereza returns to Prague, having reached the point where she can no longer cope with Tomas’s infidelities. Tomas is required to act. He must make an important decision. Should he stay in Zurich, where he is free to practice medicine, free from a political dictatorship and free from the responsibilities of a relationship? Or, should he return to Tereza in Soviet-occupied Prague? Confronted by so many options, Tomas decides nothing; he throws import to the wind. Must it be? “Yes, *es muss sein*”, he says and with a feeling of lightness, Tomas returns to Tereza whistling music from a Beethoven string quartet.

Tomas’s glib excuse, “*Es muss sein*,” comes from Beethoven’s final string quartet, the fragments of which he was whistling. *Es muss sein* is translated “That which must be” and, for Kundera, signifies the very condition of fate, “arbitrary, inadvisable and unjustifiable.” In *The Unbearable Lightness of Being*, we find Tomas forever acquiescing to fate, taking no responsibility for his actions. Tomas’s life, Kundera implies, is unbearably light. Because this characterization is one condition of our times, it is worth examining.

If we understand lightness to mean unencumbered freedom, its antithesis, weight, symbolizes those conditions that hold us in place—those structures that are difficult to change, if at all. In the String Quartet, Beethoven asks, “Can we alter fate?” How do we know what we can and cannot change? How do we play the cards we have been dealt? Asking these existential questions is essential to liberatory practice.

The String Quartet, written in 1826, was Beethoven’s last fully completed composition. This paper will examine the Finale of the work, paying particular attention to the final movement’s peculiar superscription—a riddle posed between the Third and Fourth Movements with markings that resemble the fragments of a song. We see that they indicate two compositional motives upon which the final movement is based. The melodic question, “*Muss es sein*?” and its inversion, “*Es muss sein!*” are woven throughout the Quartet’s Finale. It is the inverted melody, “That which must be,” which comes to mind when Tomas
leaves Zurich and returns to Tereza. The whistled inversion, "an inversion of possibility", becomes Tomas’s literary and musical leitmotif.

I would like to suggest that Beethoven shared Kundera’s concern for lightness and weight—or rather, Kundera shared Beethoven’s concern. Indeed, we can hear this dialectical relationship in all of Beethoven’s late compositions. Op. 135 is rather specific. For example, the melodic question, “Must it be?”, is posed several times in the introduction to the allegro section of the Finale. “Must it be?”, Beethoven asks. Can we alter fate? We hear an unmistakable response: two eighth notes and a quarter note played forte. Yet, what do these musical gestures signify? Through the infusion of wordplay within an absolute medium, Beethoven only hints at answers. There is, for example, musical content that contradicts the heaviness of his questions.

The Finale’s principal theme is a short lyrical canon and first appears in measure 17. In measure 53, there arrives a secondary theme: a pentatonic melody, light and appealing. It reminds one of a kindergarten song or a playground march. Traditionally, these contrasting melodies might suffice to provide the necessary variation, wit, and elegance of a final movement. The statement, “Es muss sein”, is present throughout the development of these ideas; its reoccurrence is unaltered. Beethoven’s compositional choices illustrate a dialectical relationship between the protean and the fixed—between transcendence and what existentialists call “facticity.” In essence, his Quartet achieves the kind of balance that Kundera’s protagonist Tomas does not. Melodies, for example, develop and modulate; they are syncopated and light. At times, the antithetical statement, “Es muss sein”, is heard in unison, but more often it interrupts the melody. Yet, without the presence of either property, Beethoven’s music might alternately sound unbearably heavy or unbearably light. Instead, the music resolves into synthesis. Beethoven’s Quartet suggests that “authenticity” exists in the tension between lightness and weight.

We have seen the different ways both Kundera and Beethoven ask, “Must it be?” Whereas Kundera’s Tomas answered this question arbitrarily, Beethoven chose to name his world. We know that at the time of creating the Quartet, Beethoven was completely deaf. Even after losing his hearing, he continued to write music; he composed, not in spite of fate, but in a state of mediation—he negotiated the arbitrary and unjustifiable. The music reveals beauty not necessarily in balance to fate, but in tension, in negotiation. By transcending the stipulations of fate, Beethoven illustrated a liberatory experience in music.

What might this Quartet reveal if we connect these ideas of struggle and possibility to lived life? If Tomas were a symbol of a certain worldview, can we link his acquiescence, his withdrawal to, say, the everyday feelings of cynicism or laissez-faire attitudes around us? At the very least, “Es muss sein” might signify the barriers that surround race, sexual identity, and economic inequality. What thought could we then give to transcending, or negotiating, the stipulations of fate?

Jean-Paul Sartre calls this double property of facticity and transcendence a “basic concept of being human.” To live “authentically,” to be truly human, requires a coordinated interplay of double or dialectical properties—between, for example, a world we can change and one we cannot. Authenticity depends upon an honest appraisal of opposing conditions; it exists in the ambiguity in between. “Authenticity” is a descriptor we can apply as equally to musical experiences and musical learning as to a Beethoven String Quartet or a novel by Kundera. We will see that understanding and addressing the tension between lightness and weight is the beginning of defining and creating a general liberatory educational practice, a form of praxis that is relevant to music and music learning.

In our postmodern age, it may seem odd to talk of Beethoven as an avenue to understanding a practice of liberation; even odder, perhaps, to hold ourselves in comparison to his towering life and work. We are told that with new technologies and multi-media, we celebrate the fleeting, the depthless, the ironic—what Kundera refers to as “lightness.” Yet, we are self-deceived, according to Sartre, if we prefer such a tension-free world. “These two aspects of human reality [transcen-
dence and fate] are and ought to be capable of a valid coordination. But self-deception, (also translated as bad faith), does not wish either to coordinate them or to surmount them in a synthesis." Self-deception "is an immediate, permanent threat to every project of the human being." 10

Bad faith, the opposite of authenticity, is the fear of responsibility. Sartre argues that the self-deceived "is afraid of discovering that the world is badly made: for then things would have to be invented, modified, and man [sic] would find himself once more master of his fate, filled with agonizing and infinite responsibility." 11 Some, like Tomas, eclipse notions of responsibility, ostensibly in the pursuit of freedom. When choosing between Tereza and exile, Tomas may just as well have tossed a coin. He bore no weight, no burden for his decision. Because he could not articulate a reason for fidelity, he continued to deceive not only himself, but also the woman who loved him.

We might begin a liberatory practice of music education by helping our students do what Tomas chooses not to do: articulate problems. For example, John Dewey’s approach to freedom, indeed education, is one that emphasizes how such articulation leads to the hypothetical. This kind of practice asks students to make connections, to become sensitive to the world around them. It necessarily assumes a position that is not neutral. Here we confront a unique challenge to our profession: how might the field of music education wean itself from a traditionally maintained, neutral stance?

For Estelle Jorgensen, music learning that is "liberating" must tend "toward facilitating individual growth, self-knowledge, [and] a critical awareness of the world about us." 12 These are a few among the "theoretical ideals toward which [educational] practice should move." 13 She writes,

Practice is not neutral: it warrants critical examination so that it can be made more humane, more just, and more inclusive. Good practice ought to avoid the pitfalls of basism, or a populist approach on the one hand, and elitism, or an exclusionary approach on the other. To accomplish this requires the necessary theoretical tools to forge changes in direction that precede changes in practice. 14

Students who are asked to imagine a better world might discover that expressive or practical means are created after the fact. This creative by-product—a newly composed song or piano improvisation—should not be limited to one style or genre, nor should the process of discovery become a singular event isolated from community or history.

If liberation is an ideal that precedes "changes in practice", we need not go it alone, as Sartre suggests. Nel Noddings challenges the bleak loneliness of existential struggle with a call for "relatedness". Ethical behavior or "caring" is central to education and community. Feelings of caring cannot operate "routinely, according to some fixed rule." To care requires an understanding of an "other". 15

Freedom that is detached from the relatedness of others is a form of bad faith. When we view human relationships from a distance, from statistics or cost-benefit analyses, we are necessarily cut off from feelings. This is a desensitized freedom, one that Maxine Greene and Dewey call "anaesthetic." In Dialectic of Freedom, Greene writes:

There may be no sense of identification with people sitting on park benches, with children hanging around the street corners after dark. There may be no ability to take it seriously, to take it personally. Visible or invisible, the world may not be problematized; no one aches to break through a horizon, aches in the presence of the question itself. So there are no tensions, no desires to reach beyond. 16

Without considering alternative views or empathizing with those different from us, Greene suggests that we replace discussion with silence. Thus, a moral vacuum surrounds many facets of postmodern life, including issues of education. The "Es muss sein" of economic inequality and race, for example, is taken for granted.

Interestingly, when such issues are discussed, the language and method are often appropriated from the business world. For example, we often hear political leaders talk of schools as
“unprofitable” enterprises. Urban schools in particular are viewed as mismanaged corporations. It is even customary to accept that a certain percentage of schools will fail. School reform takes the shape of voucher plans, a business paradigm created to ensure that competition between public and private schools will weed out the worst and guarantee survival of the fittest. That this “survival” is viewed as unrelated to a lived world—to actual students in actual neighborhoods—is, as Greene contends, unidentified and thus silenced.

There is an aspect of postmodern “lightness” that is complicit with this silence. It goes something like this: “We agree that the world is badly made, but cannot offer an alternative; we cannot transcend our condition, because by doing so we enact another form of domination or imperialism.” While I applaud attempts that undermine monolithic thinking, I don’t particularly agree that such attempts necessarily lead to new forms of oppression. I prefer to align myself with writers like Paulo Freire, bell hooks, Lisa Delpit, Cornel West, and Maxine Greene who challenge hegemonic discourses and at the same time offer “pedagogies of hope.”

For example, twelve years before Philip Alperson introduced the term praxis to the field of music education, Maxine Greene had explored praxis and pedagogy in Landscapes of Learning, an expansive inquiry into emancipatory learning, aesthetics, and social issues. Praxis, Greene argues, is more than a Deweyan reconstruction of self in relation to environment or society. Rather, praxis is the reconstruction of self with others in relation to forces in an environment or society. Greene contends that

... praxis involves critical reflection—and action upon—a situation to some degree shared by persons with common interests and common needs. Of equal moment is the fact that praxis involves a transformation of that situation to the end of overcoming oppressiveness and domination. There must be collective self-reflection; there must be an interpretation of present and emergent needs; there must be a type of realization. [italics in the original]

Greene writes that the roots of this notion of praxis stem from Karl Marx’s Theses of Feuerbach, where Marx discusses “the changing of circumstances and of human activity... understood as revolutionary practice.” [emphasis mine]

Thomas Regelski, in an article that defines praxis in music education according to Aristotelian definitions, agrees that praxis is an undertaking in the context of one’s lived world. Much of his writing is indeed congruent with Greene. Regelski advocates a practice of music education whereby judgments “bring about ‘good’ or ‘right results’ for others or for one’s own life.” The agency of praxis, he writes, is threefold. It requires the knowledge

(a) to make the ‘practical judgments’ needed to discern and then conform to rational ‘right results’... (b) to guide the actions as they unfold... and (c) to evaluate the goodness of the results in terms of the individual or group served. ..."

It goes without saying that “right results” and “goodness” will vary in myriad ways and to this I am sure Regelski agrees. I hope that within his framework, we find opportunities for risk, disruption, even wrong results. I fear, instead, a “normative” philosophy of praxis, one that seeks complete answers—a praxis that might exclude differing voices in the attainment of goodness. The search for “right results” should be problematic, even messy. How, for example, can we arrive at “right results” within cultural products that are themselves deceptive or dishonest? Kundera labels such deception “kitsch” and we will investigate his claims shortly.

A normative definition of praxis finds its philosophy in the practice of making music. In Music Matters, David Elliot, like Regelski, looks back to Aristotle. “What teaches us about ‘right action,’ says Aristotle, is the active engagement in productive music making.” This view is not sufficiently complex. Are right results “right” when music teaching is prescriptive, when “active” learning is garnered passively? How do we determine what is “rational” in music constructed
for solely commercial purposes, music targeted to the young and often of questionable content?

I wish to return to the notion of “education as risk-taking”–an ideal described by none more beautifully than Freire. Liberatory education, he writes, “is the striving for a world less ugly.”\textsuperscript{31} As I see it, music education must become more than canonic music-making, pragmatic exercises in multiculturalism, or token dabblings in popular culture; it must enable self-transformation. Praxis, thus, is nothing less than a “strategic dream”–for teacher and student. “Dreaming,” says Freire, “is not only a necessary political act, it is an integral part of the historic-social manner of being a person. It is part of human nature, which, within history, is in permanent process of becoming.”\textsuperscript{32} Here is an utter refutation of the pragmatic.

Indeed, Freire’s ideas of praxis as “strategic dream” fit nicely with our examination of lightness and weight. When fate is considered as predetermined or as “That which must be,” there is no struggle, no dream, no utopia for which to hope. “There is no room for education. Only training.”\textsuperscript{33}

On some level, I have always had an innate sense of “Es muss sein”. I recall growing up in rural Illinois and recognizing as a teenager the disconnection between the music I was playing, listening to, and reading about and the somewhat monochromatic world around me. At the same time, I asked myself, “Must it be?” I remain naturally sympathetic to stories of struggles and breakthroughs, real or fictionalized.

Currently, I teach music in New York City. Most of my students live in upper Manhattan’s least fortunate neighborhoods. My dreams for them are connected to my own-dreams of openings, be they musical or intrapersonal. What began as a folk pedagogy, as instinctive teaching, evolved into praxis–a praxis defined by the ideals of liberation and equality. I have tried with some small successes to share what I know about music with my students’ lives and histories. My students have taught me a great deal as well. The result has been the production of homemade raps, instrumental lyric-free raps, genuine pop music, and even a holiday opera.

I have learned that there is more to teaching music than designing a culturally appropriate curriculum, however admirable the attempt. At the same time, the resistance I have met has always been hard to locate. Educators must be cognizant of and then take into account societal trends, especially the changing effects of technological innovation. For one thing, young people’s lives are busier now than ever, perhaps the trickle-down result of an efficient weightless economy. When I contemplate the time it takes to learn the saxophone or play the drums, I am astonished that children today still dedicate themselves to the task, especially when I consider that a well-designed video game takes only weeks to master or that today’s music software can produce a wealth of sophisticated music, whether by accident or intention.

In his novel, Slowness,\textsuperscript{35} Kundera makes a connection between speed and arrested development. Because the world changes so quickly, we may experience trouble examining our lives. When discourses are silenced–perhaps, in an effort to create buzz or to find new trends and fashions–meta-questions about our place in the world are overlooked. For example, a recent New York Times article entitled, “Does Baby Want a Browser?” concerns software programs for the growing market of one- to three-year-olds.\textsuperscript{34} The writer goes to great length to describe this latest commercial niche, but I am concerned that in our obsession with technology, we are forgetting to ask questions–ethical questions, for example, surrounding marketing to babies or questions regarding child development and age-appropriate activities.

Speed, Kundera maintains, is “directly proportional to the intensity of forgetting.”\textsuperscript{36} In other words, the faster we live our lives, the lighter we feel. This kind of forgetfulness is an escape from responsibility, but one of which Sartre had little experience, I imagine. The person “freed of a future, has nothing to fear.”\textsuperscript{36} Kundera describes this phenomenon as elemental to popular music. Rock music is ecstatic, he complained, it

\ldots is the prolongation of a single moment of ecstasy; and since ecstasy is a moment wrenched out of time–a brief
moment without memory, a moment surrounded by forgetting— the melodic motif has no room to develop, it only repeats, without evolving or concluding.37

Kundera described a condition of postmodernity: life lived as fragments, incoherent and ahistorical. Sometimes my students remind me of those endlessly repeating melodic fragments I hear in hip-hop or rave music. The sound is intense and alive, like my students, but unbothered by development or resolution.

How different are we from today’s youth? Who is not bothered by the weight of slowness? How many music educators would have learned an instrument if today’s choices were available when we were young? Years later, I now realize that the depth of my life’s experiences—what I know about the world and myself— is related in no small part to a long participation in the arts. Learning the saxophone meant engaging in a context of sound and feelings; it problematized my world by showing me an alternative.

Technology, too, offers children alternatives, but like Kundera, I distrust its ecstatic nature. Like many well-intentioned music teachers, I have learned the difficulty of incorporating popular music in the classroom. On several occasions, I have made the mistake of planning a lengthy strategy around the latest hit tune, only to discover that the music itself was intended to be consumed and consumed quickly. When music is connected to celebrity and fashion, it scarcely lasts long enough to be examined; in fact, a prolonged association can prove a liability.

Critics Theodor Adorno and Max Horkheimer were among the first to blame “the culture industry” for mass producing art forms that expect little or no contribution from the individual.38 By emphasizing easy consumption, the culture industry “robs the individual of function. Its prime service to the customer is to do his schematizing for him.”39 Alas, we come to a serious dilemma: How do we problematize an art form that is not made to be problematized? How do we examine a world that does not wish to be examined. How, specifically, do we engage our students in a pursuit of freedom if there is nothing from which they wish to be free? Discipline after all is not a commodity we see exploited on television.

This may come as a surprise, but teenagers in New York’s Harlem community are quite similar to teenagers everywhere. They are preoccupied, like suburban young people, with money, friends, and school. They also have beliefs to which they are devoted. The problem, of course, is that much of what my students have internalized are the same unexamined beliefs and taken-for-granted assumptions that stem from our late-capitalist world. Kundera called unexamined beliefs “kitsch.” Fed by sentimentality and fixed images and metaphors, kitsch is a shared playing out. It “excludes everything from its purview which is essentially unacceptable in human existence.”40

An essential element of kitsch is dishonesty. Its dubious sentiments are often tied to profit. As early as 1961, Clement Greenberg used the term kitsch to describe art that is market driven and created for universal appeal.41 He wrote,

Kitsch is mechanical and operates by formula. Kitsch is vicarious experience and faked sensations. Kitsch changes according to style, but remains always the same . . . Kitsch pretends to demand nothing of its customers except their money—not even their time.42

Kitsch predates the twentieth century, nonetheless. Wagner was a master of deception and artificial sensation. And how different really is baroque opera from Broadway? An understanding of kitsch is important to our discussion because kitsch depends for its existence upon unreflective thinking; it is taken for granted because it is everywhere.

A precondition for kitsch must be a cultural tradition from which it can borrow. It does not operate in a vacuum, but borrows freely from various genres, styles, and histories. When deconstructed and critically examined, kitsch can become provocative content for teaching. When students are encouraged to talk about their music and their lives, they come into contact with who they are. When their narratives are shared with others, a process of examination begins; students become aware of conflicts, internal and external.
This is the beginning of a liberatory experience.

Indeed, our world seems unbearably light, untroubled by fate or questions of responsibility. This is how my students seem on the surface, with their video games, remote controls, and endless E-mail. I have discovered that an inquiry into the kitsch-making rules of music making—the rules that govern pop, or hip-hop—is to problematize the taken-for-granted. This activity should not be viewed as coercive; once the rules are scrutinized they may be changed, tested, or respected.

I would like to share an example. Not long ago, during an improvisation with a group of my pre-teenagers, enough musical material was produced to create a pop song. In essence, we had a working melody and a bass line. Before proceeding, I asked the group to come up with a working formula for writing a pop song—a list of things you can do and things you can’t do. You can, for example, write about any kind of love, especially crazy love. You cannot write about your mother. Next, we looked at stereotypes and we even decided what kind of clothes we would wear if we were rock stars. The extensive and somewhat silly amount of information we collected was written on a chalkboard. As we composed, we found ourselves revising or adjusting our formula. We did choose to break one very big rule: our song’s lyrics, we decided, did not have to rhyme. Our song is called “Jasmine,” and we considered it a hit. The chorus goes like this:

I love you Jasmine,  
You’re a groovy kinda girl.  
Everytime you look at me,  
The angels smile above.

We embraced many of our kitsch-making rules: “Jasmine,” for example, is unabashedly sentimental. I understand this to be a “sin” in postmodern times, but to this precept, I don’t think my students give much credence. In fact, I believe the experience was transcendental and full of feelings and emotions—more postmodern peccadilloes. Our learning was both praxial and aesthetic, although our composition, according to the rules of its genre, may have produced “wrong results”. As a liberatory practice, we experimented with the authority of a genre, but transcended the rules when we wished. Further, our narrative of crazy love was a kind of shared story-telling. This example demonstrates the accessibility of a liberatory practice.

Here I would like to re-emphasize Kundera’s existential equation. If the degree of speed is directly proportional to the intensity of forgetting, then “the degree of slowness is directly proportional to the intensity of memory.” This theorem has sizable implications for music education. Projects that involve ever-greater depths of understanding are antithetical to fragmented experience. “Jasmine,” for example, became memorable because of the time spent writing and re-writing. Under these conditions, the improvised had room to develop and could repeat, evolve, or conclude. Long-term undertakings (perhaps in the form of musical portfolios) subvert the bad faith of instantaneous gratification. Kundera wrote, “[I]mposing form on a period of time is what beauty demands, but so does memory.”

According to the rules of kitsch, I should conclude with a glib recapitulation of the String Quartet and Tomas. I should put forward a grand theory that resolves the issues of lightness and weight. But truthfully, I can only conclude by reflecting on the possible, on what could be.

Some, like Tomas, resign themselves to fate, believing that any choice is as good as the next. Others find freedom of forgetfulness in ever-fleeting moments of ecstasy. Although it is currently academic lightness to suggest that the arts can cure the problems facing students in school, I believe that an experience in the arts can provide the narrative structure to examine musical or personal choices. Time spent writing and rewriting, practicing, or improvising provides contexts in which we may experiment with freedom and control. And thus, it may be possible that an encounter in the arts can lead students to identify their fate, to move beyond the “Es muss sein” of poverty, lowered expectations, or sexual inequality. It is probable, if not possible, that the more a student becomes engaged in music, the more authentically musical, the more poetic, she will become. “Muss es sein?” Maybe . . . maybe it will be.
NOTES

4. Some scholars contend that “Es muss sein” and “Der schwer gefasste Enschluss”, translated, “the difficult resolution,” were intended only as a private joke between Beethoven and his publisher. For others, there is a striking impression of parody: the mood and texture of the Grave—the tremolo, diminished sevenths, double stops, extended range, exaggerated dynamics—are more reflective of the orchestra or opera than the String Quartet. One might ask, does not the Finale fail to assume proper solemnity? Is it too abbreviated to truly tackle the issues of lightness and weight? Perhaps the enigma of “Es muss sein” means nothing at all. Philippe Radcliffe writes, “. . . there is a further possibility that Beethoven, realising perhaps that one theme was a melodic inversion of the other, added the words later.” (Beethoven’s String Quartets [London: Hutchinson & Co, 1965]).
6. Ibid., 90.
7. A better example, and one often associated with existentialism, might be jazz–music that seems cold and hot at the same time.
8. Mauvaise foi is translated as “bad faith” by Hazel Barnes and as “self-deception” by Philip Mairet.
9. Ibid., 98.
10. Ibid.
13. Ibid., 44.
14. Ibid.
17. “. . . the only role of the philosopher, in the midst of the cacophony of cross-cutting conversations that comprise a culture, is to decry the notion of having a view while avoiding having a view about having a view.” Richard Rorty, “Philosophy and the Mirror of Nature” in David Harvey, The Condition of Postmodernity (Cambridge: Blackwell Publishers, 1990) 1994), 56.
24. Ibid., 28.
25. Ibid., 29.
26. Ibid., 25.
27. Ibid., 25.
29. Freire, Pedagogy of Hope, 91.
30. Ibid.
31. Ibid. Also, see Regelski, “The Aristotelian Basis,” 24-28, for a view of “training” as techne.
34. Ibid., 2.
37. Ibid., 124.
38. Kundera, Slowness, 39.
40. Ibid., 25.
41. Ibid., 38.