A COMPARATIVE PERSPECTIVE ON LEGAL PROFESSIONS IN THE 1980s

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The scale of the quantitative changes in the legal profession of the United States described by Curran seems to be not unusual in the Western industrialized world. Many countries have similarly experienced large increases in the absolute number of lawyers, the ratio of lawyers to population, and the proportions of comparatively young and inexperienced lawyers and women lawyers. Nevertheless, the United States remains unusual in its high proportion of lawyers in private practice.

The figures presented by Curran (1986) seem remarkable confirmation of a widespread sense that this is a time of unprecedented change within the legal profession in the United States. Some believe that these changes are unfortunate, even dangerous, and that they result from unique defects in national character and institutions. Halliday (1986), however, suggests that such changes are not without precedent. The purpose of this article is to illustrate that at least some of the changes that have occurred in the United States are not so unusual when compared with those in other countries. Curran presents statistics to document three particularly dramatic changes: (1) the increase in both the absolute number of lawyers and the ratio of lawyers to population; (2) the alteration of the composition of the legal profession in terms of the age and experience of its members; and (3) the substantial increase in the proportion of women lawyers. All these changes have parallels in other countries and, indeed, seem to be the norm rather than the exception in the Western industrialized world.[1]

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[1] For some years a Working Group of the Research Committee on the Sociology of Law of the International Sociological Association has been assembling a series of reports on the legal professions of the advanced Western countries. These reports, which will be published in three volumes by the University of California Press, have provided all the data in this paper except

Because the figures in Curran's article are based on entries in a directory (*Martindale-Hubbell Law Directory*) that enable her to relate the date of entry into the legal profession to current employment within it, she can produce a cohort analysis tracking the experience of recent entrants in greater detail than is possible when only gross figures for particular categories are available. Such a cohort analysis has not been published, to my knowledge, for any other national legal profession (except perhaps in France), and therefore we cannot know whether recent entrants to the field in other countries are progressing at different rates or taking different paths. On the other hand, a cohort analysis like Curran's cannot tell us which and how many entrants to the legal profession have already left it or where they have gone.

For ease in comparing the absolute increase of numbers, I have used the ten-year period nearest to 1970–80 for which national figures are available (see Table 1). Because in some cases I have data only for the private practicing profession, I have given two sets of figures for the United States and some other countries: first for those in private practice, and then for *all* those thought to be engaged in legal work, whether privately or publicly employed, including the judiciary, public prosecutors, and law teachers.

The figures for countries other than Belgium cannot be compared with the figures for all United States lawyers, although English and Scottish solicitors and the larger French category include lawyers not in independent private practice. But the position is clear: except for Italy,[2] the increase in the number of lawyers in these countries more than equals the increase in the United States. Particularly notable is the increase in the most traditional forms of practice: the English barrister and the French and Belgian advocate.

Demographic changes affect our understanding of such increases in two ways, both indicated in Curran (1986). First, there may have been an increase in the pool of those from whom entrants to the legal profession were drawn because there were more people in the relevant age groups. If such an increase is to have explanatory force, we must assume that the desire and ability to become a lawyer remain constant within a given population, so that if the relevant age group increases, so

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where some other source is given.

There is a prevalent perception in Canada that the current increase in numbers is unprecedented, which is equally unfounded.

[2] For Japan see n. 6 below.

Table 1. Increase in the Number of Lawyers within Selected Countries

Country	1970[a]	1980[a]	Increase (%)
United States			
Private practice	258,198	370,111	43.3
All	355,242	542,205	52.6
England and Wales			
Barristers[b]	2,584	4,589	77.6
Solicitors	24,407	37,832	55.0
Scotland			
Advocates[c]	111	173	55.9
Solicitors			
Enrolled[d]	4,083	5,830	42.8
Practicing[e]	3,267	5,329	63.1
France			
Avocats	7,756	15,715	102.6
All[f]	14,886	23,431	57.4
Italy[g]	39,415	45,000	14.2
Germany			
Anwälte	22,882	36,077	57.7
Belgium			
Advocates	3,827	6,886	79.9
All[h]	13,463	22,100	64.2
New Zealand	2,660	4,041	51.9
Netherlands	2,063	3,600	74.5

[a] For the following countries the 10-year period is not 1970–80: Italy, 1968–78; Scotland (solicitors), France, New Zealand, 1971–81; and Scotland (advocates), 1972–82; and for the following, the period is not 10 years: Germany, 1969–80; and Belgium, 1970–82.

[b] Does not include publicly or privately employed barristers.

[c] Includes only advocates in private practice.

[d] Includes those retired and not practicing.

[e] Includes those in government, industry, and commerce.

[f] Includes *avoués*, *greffiers*, *syndics*, and *notaires*, but not *conseils juridiques*, for whom figures were not given for the earlier year.

[g] Figures shown on Law Lists.

[h] Includes judges and notaries.

will the number of those entering the profession. An increase in the population at large may also explain why the proportion of lawyers to the rest of the population remains constant despite an increase in the absolute number of lawyers. Here we must assume that the demand for lawyers' services bears a linear relationship to population size.[3] In either case, because be-

[3] This is not, however, a safe assumption. Lawyers provide some serv-

coming a lawyer takes time and tends to be the prerogative of particular age groups,[4] one would expect to find leads and lags rather than exact correspondence, even assuming that population is the sole or principal determining factor; these matters are discussed by Halliday (1986).

While it has been a commonplace that the United States has a lawyer to population ratio higher than that in any other country, the significance of this fact is debated because of variations in the stage at which legal training is received and differences in the tasks performed by the legally qualified and in the persons by whom and the contexts in which legal tasks are performed. Without entering into such controversies, we still can compare the way in which the population to lawyer ratio has changed in different countries. Curran (1986) shows that in the United States this figure fell from 572 to 1 in 1970 to 418 to 1 in 1980, while the decrease in the population to private legal practitioner ratio was rather less for the same period: from 787 to 1 to 612 to 1. In Belgium during a twelve-year period (1970–82), the population to advocate ratio declined from 2,521 to 1 to 1,431 to 1, a considerably greater drop than seen in either of the United States figures. For all Belgian lawyers, the ratio decreased from 717 to 1 to 446 to 1, which, although not quite as large a change, was still appreciably greater than that in the United States. Even more substantial changes may be found elsewhere. In Ontario, Canada, for example, the population to lawyer ratio fell from 1,043 to 1 in 1970 to 599 to 1 in 1980.[5] Similarly, in Scotland the ratio of population (which declined slightly) to practicing solicitors declined from 1,600 to 1 in 1971 to 963 to 1 in 1981.

Some increases in absolute numbers of lawyers, however,

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ices for individuals in their private lives and also for companies in their business activities, and there are also intermediate situations. Population growth may increase business activities, and business prosperity may in turn affect the capacity of individuals to generate a demand for domestic conveyancing. Pashigian (1978) finds that growth in real national income is an important determinant of the number of lawyers in the United States. The number of divorces also is statistically significant but much less important. While he cites figures for both absolute numbers of lawyers and the ratio of lawyers to population, he does not consider how these might be related, and his main thesis concerns absolute numbers.

[4] Different demands for legal services are also, to some extent, age-related. Criminal activity by intending lawyers' coevals may have generated increased demand by the time career choices are made, but the greater demand of an increased population for domestic conveyancing may be delayed for 10 or more years.

[5] The change in the Netherlands is comparable, with an increase of over 60% in the lawyer to population ratio from 1970 to 1980. But the base figure (1 lawyer to over 6,000 people) is so radically different as to make comparison impossible.

were counteracted by population increases. In New Zealand, for instance, an increase of 52 percent in the number of lawyers between 1971 and 1981 represented only a 38 percent increase in the proportion of lawyers to population. The example of Italy makes it clear that changes on the scale we have been discussing are not universal.[6]

This is not the place to discuss in detail the causes of these increases in the number of lawyers. On the "supply" side, Curran (1986) shows the apparent effects of the "baby boom" and the influx of women into the profession. The latter phenomenon reminds us to look not only at the total population within the age group that typically enters the profession but also at the number qualified to consider entry, a number that may increase because of changes in either the availability of higher education[7] or perceptions of the accessibility of the profession to groups formerly excluded or underrepresented, such as women or ethnic or national minorities.[8] On the "demand," or "pull," side, there may be an increased "rights-consciousness" in the population; a reaction to state involvement in the economy and its regulation or in the lives of citizens; an acceptance of a public responsibility to provide legal representation to individuals who cannot afford it; or, as may have been the case in Great Britain, an increase in home-ownership at a time when the legal profession maintained control over the formalities of transferring land.[9] These factors may even be the result of the increase in lawyers rather than its cause.

Secondly, the recent increase in the number of lawyers has changed the age structure of the legal profession and enlarged the proportion of inexperienced lawyers.[10] Curran (1986) shows that among all lawyers in 1980, 42 percent had been ad-

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[6] In addition, an absolute increase in the number of lawyers in Japan, from 6,040 in 1956 to 11,466 in 1980, seems to have more or less stopped during the 1970s (in 1976 there already were 10,792). The proportion of lawyers to population increased substantially between 1956 and 1976 (from 0.68 per 10,000 population in 1956 to 0.96 in 1976) but started from a very low baseline. In Japan the number of judicial scriveners, whose work overlaps considerably with that of lawyers, exceeds the number of lawyers by 25% to 30%.

[7] Very considerable expansion in the numbers entering higher education from the 1960s onward will have differing effects on the pool of potential entrants depending on whether a first degree in law qualifies one for entry into the legal profession, a further period of training is required, or the law degree is a graduate degree. Each alternative also has different connotations for the extent to which a law degree represents a commitment to a legal career.

[8] In Belgium during the late 1960s and the 1970s, there were substantial increases in the number of women and Flemish-speaking entrants, while the number of French-speaking male entrants remained roughly constant.

[9] The demand side also is fueled by economic growth (Pashigian, 1978).

[10] In the United States and other countries, the Depression and World War II had also helped to shrink what are now the older age groups.

mitted in the nine years between 1971 and 1979, and that 62 percent of the latter had been admitted from 1975 to 1979.[11] Such figures obviously suggest the possibility of problems in the areas of on-the-job training, supervision, and the gradual acquisition of experience.[12] Those lawyers not in private practice are likely to be working in organizations where supervision is usual. Of those in private practice, nearly a quarter (23.2%) were in firms with eleven or more lawyers, and another 9 percent were in firms with six to ten lawyers; in both of these situations supervision or cooperation is very possible. But the largest proportion of the private-practice entry cohort (47.6%) were in solo practice, where supervision is absent and cooperation unlikely.[13]

Length of legal experience is the relevant variable for many questions of policy in the training or further education of lawyers. When this information is unavailable, one must either take a modal age for entry into the profession or use some other category, such as an apprenticeship or the *stage* (a period of practice after qualification but under supervision in some civil-law countries), as an indicator of the numbers of inexperienced members of the profession. Thus, in New Zealand between 1971 and 1981, the proportion of those in the legal profession between the ages of twenty-four and thirty-four rose by over one-third, with the result that more than half of all lawyers were under thirty-four (presumably having had a maximum of eight to ten years experience after admission). In Scotland in 1962, about one-third of enrolled solicitors were under forty, and this proportion had not changed very much by 1972, although by then a considerably higher proportion of this group was under thirty. But by 1982 the proportion of the Scottish legal profession under the age of forty had risen to well over half (56.81%), and over a quarter of enrolled lawyers were under thirty.[14] This latter group is unlikely to have had more than six years experience after a two-year apprenticeship.[15] To show that these trends were not confined to common-law jurisdictions, one can cite a survey (Klijn, 1981) of lawyers in the

[11] The figures were very similar for those in private practice, 43% of whom had been admitted between 1971 and 1979.

[12] Such changes in the age structure also may have consequences for structures of professional self-government.

[13] It would be helpful to know whether the proportion of 1975 and later entrants in this category was similar to the 62% for all lawyers.

[14] If allowance were made for those who had retired, the proportion would have been even greater.

[15] This was replaced in 1980 by a one-year diploma course, followed by a two-year "contract of training."

Netherlands in 1979, which found almost precisely the same distribution as in New Zealand (52% of all lawyers were thirty-four or younger); because Dutch lawyers qualify at a later age, the proportion of comparatively inexperienced lawyers is greater.[16] In the Netherlands, the proportion of lawyers in the mandatory post-university three-year apprenticeship rose from an average of under 7 percent at the beginning of the 1970s to more than four times that figure at the end of the decade. In France, where the increase in the number of lawyers was even more dramatic but had begun earlier, the proportion of those in the *stage* remained about 25 percent in the years from 1978 to 1981 and then began to fall off.[17]

The significance of lack of experience is twofold. First, where the productive unit can expand (law firms, house counsel, and governmental agencies, for instance), an influx of younger people may fuel and respond to a demand for personnel who are qualified but subordinate and less well paid, making possible modes of service delivery that are more bureaucratic, lower in cost, and more profitable.[18] But another result is also possible. Particularly when the expansion in the number of lawyers takes place at a greater rate than can be accommodated by the existing structures of employment and training, there may be a tendency for new entrants to go into solo practice as the easiest and perhaps the only course possible.[19] Curran's (1986) figures suggest that this tendency is not marked: the proportions of lawyers in solo practice are very similar for the 1971–79 admission cohort and for those admitted earlier. Nevertheless, the decline in the proportion of solo practitioners has been halted, and it seems likely that one factor is an increasing proportion of younger lawyers who have entered solo practice at an earlier stage in their careers than their predecessors. Slight support for this conclusion may be found in a 1976 study of lawyers in Chicago, which suggests that an

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[16] In the Netherlands, the group under the age of 39, who have no more than 10 years experience, in fact constitute two-thirds of all lawyers (Klijn, 1981). Similarly, in England by the end of the 1970s, nearly 60% of all barristers were within 10 years of call to the bar (effectively with 9 years or less experience), while the same proportion of solicitors had practiced for less than 16 years.

[17] This may well have been because of the introduction of a compulsory year of training before the *stage*, causing a one-year drop. For a glimpse of the competition for such apprenticeships, see Larivière, 1982: 95.

[18] This, as well as its consequences, is discussed in Schwartz, 1980; see also Abel, 1982.

[19] For a similar conjecture, see Zemans and Rosenblum: "an oversupply would be expected to swell the ranks of the solo practitioners, as well as increase the number of non-practitioners" (1981: 21–22, n. 13).

increasing number of recent law-school graduates had gone into solo practice as their first job (Zemans and Rosenblum, 1981: 69, Table 4.2).[20]

Although the largest United States law firms are considerably larger than firms in other countries, the tendency Curran (1986) remarks for the proportion of employed lawyers to increase with firm size can be found elsewhere, particularly in England. It is not as easy to find parallels with the degree to which solo practice still prevails in the United States or is entered by the newly admitted. First, the significance of solo practice in societies with a strong tradition of the independent, free, or liberal legal profession, in its full sense, is very different. Solo practice will not be seen as a less desirable alternative to more lucrative, large-firm practice,[21] and employment and even partnership may actually be prohibited for those wishing to engage in advocacy in the highest courts. In such a context, only a minority of lawyers may practice in association with others, and even these arrangements may amount to nothing more than a sharing of office space and expenses.[22] It is not impossible for solo lawyers to rank highest in prestige amongst legal professionals; this is the case not just in England, where barristers are a separate profession, but, for instance, also in Venezuela. Again, equivalents of American large firms may exist outside the traditional legal profession altogether.[23] Nevertheless, the tradition of independent practice is often accompanied by a three-year period after formal qualification during which the new lawyer is supervised to some extent (as in

[20] While only 4.9% of those out of school from 6 to 15 years listed solo practice as their first position, 8.3% of those out of school 5 years or less did so. The authors also comment that young attorneys in solo practice may not be as likely to appear in *Martindale-Hubbell Law Directory*, which Curran (1986) and her predecessors have been based on, as those in firm practice and thus may not have been counted (1981: 70 n. 9).

[21] Even if one confines oneself to profitability, it seems that in Japan a solo lawyer, with assistants, working in a provincial town, can earn an income rivaling those of partners in Tokyo firms. Of course, in the United States, contingent fees and large jury verdicts may make solo or small-firm practice extremely lucrative.

[22] Such cooperation can be difficult to characterize. Thus, although English barristers practice as individuals, they are bound to do so in sets of chambers, sharing expenses, secretarial arrangements, and sometimes even work (for instance, smaller criminal cases), which will be allocated by the clerk to whichever member of the chambers is free to take it. But these are in no way partnerships, and in civil work and the more substantial criminal cases, each barrister will receive, and profit from, work very much as an individual. The dangers of unsupervised solo practice by inexperienced barristers are mitigated only by a brief formal pupillage and the ready availability of advice thereafter.

[23] *Conseils juridiques* in France, for instance, or salaried lawyers (who may be *Rechtsanwälte*) in Germany.

Belgium, the Netherlands, France, and Italy)[24] and is expected to continue to attend working groups at a center for professional training (as in France). England similarly prohibits a solicitor from practicing in a separate office for three years after admission. Two possible results of this policy are that less than 10 percent of young English solicitors are in solo practice and that about 30 percent are salaried associates (a higher proportion than in the United States). Although this restrictive rule apparently does not apply in Scotland, the figures there are very similar.[25] In both countries solo practitioners number about one-third of all practicing lawyers, a smaller proportion than in the United States, although in England the proportion has declined in only a few years from 42 percent. In Germany, an increasing proportion of new entrants are becoming advocates (*anwälte*) because of the contraction of other career alternatives, particularly in the public service and the judiciary, which women entrants had traditionally preferred. But these new advocates have completed an average of six years in a university law course and two and a half years of professional in-service training. The United States seems to have a higher proportion than any other country of comparatively recent entrants practicing in a relatively unsupervised context, although some states have begun to require further education.

Curran's (1986) third main observation is the increase in the proportion of women entering the American legal profession. She shows that the growth in numbers in the legal profession after 1972 is the result almost exclusively of the increase in the number of women entrants.[26] But while the increase seen in the United States is dramatic, it follows rather than precedes similar developments elsewhere. Curran estimates that 12.8 percent of the 1984 population of lawyers was women, a proportion that rose by over half from the 1980 figure of 8.1 percent.[27] This is not surprising, given that 34 percent of new entrants were women. These figures are difficult to compare with those for other countries because we lack informa-

[24] These arrangements may sometimes amount to a salaried and subordinate status in fact if not in theory.

[25] This comparison suggests that other factors, such as economies of scale, may be more significant than the restriction on newly admitted solicitors.

[26] It is difficult to be as specific for other countries. For instance, while in Belgium an increase in the number of women entrants to the profession contributed substantially to the increase in numbers, part of the increase results from improved access to higher education for the Flemish-speaking population (see n. 8 above).

[27] Her 1980 figure is appreciably less than those given by other writers: 12% in 1980 (Epstein, 1981), and 11% in 1979 (Fossum, 1980).

tion about lawyers outside private practice elsewhere, but what we do know suggests that the United States is following rather than leading in this trend. In Belgium by 1984, for example, 21 percent of the legal profession (broadly defined) and 35 percent of advocates were women. Similarly, in France, women comprise nearly a third of all *avocats* and a majority of *avocats* between the ages of twenty and thirty.[28] The figures for total membership in England are less striking, although nearly one-third of all those admitted as solicitors in England from 1980 to 1982 were women. But in Scotland in 1982, women comprised 36 percent of newly admitted solicitors and 17 percent of all solicitors. Generally, not only have women been qualifying as lawyers in other countries at a rate similar to that in the United States, but there are countries in which this process began earlier.

The significance of these facts can be debated. Will women lawyers be forced to remain in subordinate jobs or at least fail to reach the most prestigious positions in numbers proportionate to men, as may be the case in Scotland?[29] Will their presence in the profession reduce its status, as has happened with clerical employment? The latter seems unlikely in view of the profession's importance and a more generalized acceptance of women in the professions. But the effects will vary from country to country depending on professional structures (in particular the extent to which parts of the profession become marginalized through oversupply) and political and institutional factors such as the degree of feminist pressure and the existence of legal remedies for discrimination (one might expect lawyers to be particularly sensitive to legal provisions). It has been suggested that the influx of women into the profession has precluded an increased diversity of class origins among new lawyers, because in most countries both male and female entrants have tended to have at least middle-class backgrounds. On such a view the entry of women would be seen as an es-

[28] A third of the *procuratori* (qualified lawyers serving their three-year apprenticeship) interviewed in Lombardy for Pocar's study (1983) were women. It is suggested in that volume (p. 31) that the percentage of women in the legal profession in Denmark and Sweden is only 10%, whereas in other European countries, including Italy, the proportion is currently between about 25% and 33%. These statements, however, may reflect a confusion between recent entrants, for which such figures seem appropriate, and the whole profession, for which they seem high.

[29] Curran's (1986) article shows the importance of being able to follow the experiences of a cohort in answering questions of this kind, although her data cannot yet tell us the outcome of the experience of women as associates in the largest firms, where they are strongly represented.

sentially conservative reaction by a middle-class profession.[30] However, at this point we have no clear intellectual guidelines for understanding this dramatic and universal phenomenon, or for predicting its impact.

Finally, Curran's Table 3 (1986: 27) on the distribution of qualified lawyers among different forms of employment is of particular interest from a comparative perspective. Her findings have consequences for the nature and structure of the profession, but it is not until one begins to compare the American distribution with those in other countries that one is led to ask deeper questions about the nature of lawyers' work in different contexts. Even asking the basic question of who are to be included in the profession will take one into these questions. Consider, for example, the legally qualified German civil servant; the legally qualified German civil servant; the legally qualified Norwegian who, after many years as a businessman, may become a judge; and the Japanese judicial scrivener who performs functions relating to court business while his counterpart with a university law degree but without a legal qualification advises the corporation for which he works. Clearly we are concerned here not with a definitional question but with the views of the scholar and the society about the importance of the kind of legal training received, the functions performed, and the context in which they are executed (including relationships with clients and employers). The purposes for which these questions are asked will affect the groupings used to categorize the distribution of lawyers among different forms of employment. If, for instance, we want to know the areas in which legal knowledge is deployed, we will be interested in all those who use their training or experience in the law, whether or not they have qualified to practice. We shall need to know whether a law degree confers specific legal knowledge in a particular society and whether degree-holders use that knowledge in the course of their work. The generalized statistics presently available fail to provide this information. If one's interest is in the bureaucratization of the legal profession or the degree to which newly qualified entrants are exploited, one may be concerned

[30] A survey of lawyers in the Netherlands (Klijn, 1981) showed that although the proportion of lower- and middle-class male entrants to the legal profession had increased considerably after 1969, the class composition of women lawyers was very much in line with the pre-1969 composition of the profession as a whole. On the other hand, at least for the University of Leuven, law students (not necessarily entrants to the profession) in Belgium are socially more heterogeneous, and the figures for men and women are very similar. However, these statistics may have reflected the inclusion in the statistics of women criminology students, whose origins were more working class.

with the total number of employed lawyers and will group those employed in law firms with those employed in private corporations or associations, the government, and government-funded institutions. But one also may be interested in the number of lawyers in the private as opposed to the public sector, in which case those engaged in private practice would be grouped with those employed by private corporations and associations.[31] One might likewise be interested in the strength of the private profession, perhaps to test the argument that it resists state abuses and guarantees individual liberties.

Curran's Table 4 (1986: 27) serves as a starting point for such discussion. It is based on the number of people who have qualified as lawyers and, as it has been put, care to be recognized as lawyers. This population may not be directly comparable with holders of law degrees (even when the degree qualifies one to practice) or with those enrolled on a register that entitles them to practice. Nevertheless, it seems possible to say that the United States continues to have one of the highest ratios of private practitioners to all lawyers among those countries for which statistics exist, even though, as Curran shows, this ratio has been declining since 1960.

English and Scottish figures seem comparable, but lawyers not in private practice in those countries are less easily identifiable. In Belgium, advocates and notaries substantially declined as a proportion of the profession between 1937 and 1961 (from 65% to 42%), a decrease that continued until 1982, when they were only 37 percent of all lawyers. The possibility of such changes over time makes it difficult to perform a synchronic comparison of different countries, but the available figures do not seem inconsistent with the statement that the United States (and possibly all common-law countries) have relatively high proportions of lawyers in private practice.

Is there anything to be made of this? Clark (1981) has suggested that the distribution of lawyers among different practice and employment situations in various countries reflects differences in the relative emphasis they place on state planning or a market economy rather than the difference in legal traditions. He contrasts the United States with Germany, where the proportion of lawyers in private practice is comparatively small and the degree of state involvement in the economy greater. He is correct to some extent; for instance, the New Deal was accompanied by a considerable increase in the number of law-

[31] In Belgium, some nominally private associations are state-funded for public purposes and thus perhaps should be excluded.

yers in government. But two factors tell against Clark's case: the state may use experts in other disciplines for planning, and the response to state involvement may be the proliferation of forms of private practice aimed at minimizing the adverse and maximizing the favorable impacts of state action. It is not only in the United States that an important element of private practice (including house counsel) is advising on requirements imposed by the state and acting as an intermediary between the client and the state. But it often is observed that recent decreases in government regulation in the United States have been accompanied by a decline in the number of Washington law offices. Curran's statistical survey cannot answer these questions, but an attempt to compare her findings with those from other countries gives us a helpful start in formulating them.

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