

**THE CONCEPT OF PARLIAMENT AND PARLIAMENTARISM:  
A COMPARATIVE ANALYSIS OF THE UNITED STATES, UZBEKISTAN,  
ITALY, AND JAPAN**

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**Abstract:** *Parliament stands as the foundational institution of modern democratic governance, embodying the principle of popular sovereignty and serving as the primary vehicle for legislative authority across political systems. This article examines the concept of parliament and parliamentarism through a comparative lens, analyzing the legislative structures of four distinct nations: the United States of America, the Republic of Uzbekistan, the Italian Republic, and Japan. Drawing on constitutional texts, political science literature, and institutional records, the study explores the etymological and conceptual origins of parliament, the theoretical underpinnings of parliamentarism as a system of governance, and the structural and functional variations across bicameral and unicameral models. Through systematic comparison of chamber composition, member qualifications, electoral systems, powers, and mechanisms of executive accountability, the article demonstrates that while all four systems share a commitment to representative democracy, they differ substantially in the relationship between the legislature and the executive, in the distribution of powers between chambers, and in the scope of parliamentary authority. The findings suggest that the design of parliamentary institutions reflects deep historical, cultural, and constitutional traditions, and that no single model can be deemed universally superior. The article contributes to the comparative constitutional law literature by integrating the case of Uzbekistan — a transitional democracy with a hybrid presidential-parliamentary system — alongside three established democracies.*

**Keywords:** *parliament, parliamentarism, bicameralism, comparative constitutional law, legislative institutions, United States Congress, Oliy Majlis, Italian Parliament, National Diet, separation of powers.*

## **1. Introduction**

Parliament is the defining institution of modern democratic statehood. From its earliest medieval incarnations in thirteenth-century England to its contemporary manifestations across more than 190 sovereign states, the legislative assembly has served as the primary vehicle through which citizens exercise collective political will. The term itself derives from the Old French *parler* — to speak — signaling that the legislature is fundamentally a deliberative forum, a place where the people's voice is translated into law (Lijphart, 1999). Yet the concept of parliament encompasses far more than mere deliberation. Modern parliaments perform a rich array of functions: enacting legislation that regulates social and

economic life; scrutinizing and controlling the executive branch; ratifying international treaties; approving state budgets; and providing a forum for democratic accountability. In presidential systems such as the United States, parliament — called Congress — coexists as an independent branch separated from the executive by constitutional design. In parliamentary systems such as Italy and Japan, the legislature generates and sustains the government, with the executive deriving its authority from continued legislative confidence. In hybrid or semi-presidential systems such as Uzbekistan, the parliament exercises meaningful authority while sharing power with a strong executive presidency.

The comparative study of parliamentary institutions has gained renewed scholarly importance in the twenty-first century. The third wave of democratization (Huntington, 1991) produced dozens of new constitutions and legislative assemblies, particularly in post-Soviet Eurasia, creating natural laboratories for constitutional design. Simultaneously, established democracies have faced institutional stress — from legislative gridlock in the United States to constitutional crises in Italy — renewing academic and public interest in how legislatures are structured, empowered, and constrained.

This article contributes to this literature through a systematic comparative analysis of four parliamentary systems: the United States Congress, the Uzbek Oliy Majlis, the Italian Parliament, and the Japanese National Diet. These four cases are selected to maximize analytical variation: they differ in regime type (presidential, parliamentary, semi-presidential), constitutional history (eighteenth century to post-Soviet), geographic location (North America, Central Asia, Western Europe, East Asia), and chamber structure and powers. Together they offer a representative sample of the diversity of modern legislative design. The article proceeds as follows. Section 2 reviews the etymology and conceptual development of parliament and parliamentarism. Section 3 examines theories of bicameralism. Section 4 provides detailed institutional profiles of each country's legislature. Section 5 presents a comparative analysis across key dimensions. Section 6 discusses the findings and their implications. Section 7 concludes.

## 2. The Concept of Parliament and Parliamentarism

### 2.1 Etymology and Definitional Foundations

The word “parliament” entered English political vocabulary from the Old French parlement and the Latin parliamentum, both derived from parler — to speak or converse (Rials, 1980). The etymological root signals the deliberative character of the institution: parliament is above all an assembly that speaks, debates, and decides through the medium of speech rather than command or force. In contemporary political science and constitutional law, parliament is defined as the supreme representative body vested with legislative authority in a democratic state (Bogdanor, 1988). It acts on behalf of the people — the national sovereign — and gives legal expression to collective political decisions. The terminology used to denote this institution varies considerably across political cultures. Terms such as “Majlis” (Arabic and Central Asian traditions), “Diet” (from the Latin *dieta*, used in Japan, Germany, and historically in Poland), “Knesset” (Israel), “Seym” (Latvia, Lithuania, Poland), “Riksdag” (Sweden), “Cortes Generales” (Spain), and “Congress”

(United States and most of Latin America) all denominate the same fundamental institution — the supreme legislative assembly — while reflecting distinctive historical and linguistic traditions (Shugart & Carey, 1992).

The label a state attaches to its legislature is not merely linguistic; it often signals constitutional philosophy. The use of "Congress" in the United States deliberately evokes a convening of separate and equal sovereign entities — the states — rather than a unified national parliament subordinate to a sovereign Crown, as in the British tradition. Similarly, Uzbekistan's legislature, the Oliy Majlis (literally, "Supreme Assembly"), reflects both Soviet institutional vocabulary and indigenous Central Asian political culture.

## 2.2 Parliamentarism as a System of Governance

Parliamentarism must be distinguished from the mere existence of a parliament. Parliamentarism is a form of democratic governance in which the executive branch derives its authority from and is accountable to the legislature (Lijphart, 1999; Linz, 1990). In a pure parliamentary system, the head of government — the Prime Minister or equivalent — must maintain the confidence of the legislature to remain in office. The legislature can remove the executive through a vote of no confidence, and the executive can typically dissolve the legislature and call new elections. This fusion of legislative and executive authority distinguishes parliamentary systems fundamentally from presidential systems, in which the executive derives legitimacy from a separate popular mandate and cannot be removed by the legislature except through the extraordinary mechanism of impeachment.

Juan Linz (1990) famously argued that parliamentary systems are superior to presidential systems in terms of democratic stability, citing the fixed terms and winner-take-all character of presidential elections as sources of constitutional rigidity and political polarization. Arend Lijphart (1999) extended this analysis by connecting parliamentary institutions to consensus democracy — a model associated with power-sharing, proportional representation, and coalition government. These theoretical traditions inform the comparative analysis that follows.

It is essential to recognize, however, that parliamentarism exists on a spectrum. Pure parliamentary systems (United Kingdom, Japan, Italy) sit at one end. Pure presidential systems (United States, most of Latin America) sit at the other. Semi-presidential or hybrid systems (France, Uzbekistan, Russia) combine elements of both: a directly elected president with substantial executive powers coexists with a prime minister who requires parliamentary confidence. The resulting institutional dynamics — and the power of the legislature relative to the executive — vary considerably across this spectrum.

## 2.3 Historical Development of Bicameralism

The two-chamber legislature — bicameralism — has its origins in medieval England. The English Parliament of the thirteenth and fourteenth centuries initially met as a single assembly of nobles, clergy, and commoners. By the mid-fourteenth century, this assembly had permanently separated into two bodies: the House of Lords (comprising nobles and senior clergy) and the House of Commons (comprising knights of the shire and burgesses from towns). This division institutionalized the social hierarchy of feudal England into

parliamentary form and established the structural template that would be exported across the world over the following five centuries (Russell, 2013).

The theoretical defense of bicameralism was articulated most influentially by Montesquieu in *The Spirit of the Laws* (1748), who praised the English system for creating a mechanism of mutual restraint between chambers — each possessing the power to block the other's excesses. James Bryce (1921) similarly identified bicameralism's filtering function as its central virtue: the upper chamber, typically more conservative and deliberate, would slow the lower chamber's occasional impulsiveness and protect against hasty or poorly drafted legislation. The American constitutional framers embraced bicameralism for both philosophical and political reasons. Philosophically, they shared Montesquieu's distrust of unicameral assemblies, which they associated with democratic excess (Madison, Hamilton & Jay, 1788/2003). Politically, the Great Compromise of 1787 — the Connecticut Compromise — resolved the fundamental conflict between large and small states by creating a bicameral legislature in which the lower chamber (the House of Representatives) would be apportioned by population, and the upper chamber (the Senate) would provide equal representation to each state regardless of size (Rakove, 1996). The bicameral model subsequently spread beyond federal states. Today, unitary states including Italy, Japan, France, Spain, and Uzbekistan maintain bicameral legislatures, adapting the two-chamber structure to non-federal contexts where the upper chamber typically represents regional or territorial interests rather than constituent states (Russell, 2013). As Tsebelis and Money (1997) demonstrate, bicameral systems function as veto player systems: a bill must pass both chambers to become law, and the more the chambers differ in composition and preferences, the more constraining bicameralism becomes.

### 3. Structural Models of Parliament

#### 3.1 Unicameralism vs. Bicameralism

The most fundamental structural choice in legislative design is the number of chambers. Unicameral parliaments consist of a single assembly; all legislative authority is concentrated in one body. This model is associated with speed, simplicity, and democratic directness — there is no second chamber to delay or dilute legislation. Contemporary unicameral parliaments include those of Sweden, Denmark, New Zealand, and Nebraska (the only US state with a unicameral legislature). Unicameralism is also prevalent in smaller states, where the complexity of maintaining two chambers may exceed the institutional capacity or political need (Lijphart, 1999).

Bicameral parliaments distribute legislative authority across two chambers. As noted above, this model introduces a filtering function — legislation must survive scrutiny in two distinct forums before becoming law. The practical effect is to slow the legislative process and increase the number of veto points. From a normative perspective, this can be viewed either as a safeguard against hasty or majoritarian legislation, or as a source of gridlock and institutional paralysis, depending on one's constitutional philosophy.

The design of the upper chamber is particularly variable. Tsebelis and Money (1997) identify four principal methods of upper chamber formation: direct election (United States

Senate after the 17th Amendment, Italian Senate, Japanese House of Councillors); indirect election (French Senate, German Bundesrat); appointment (Canadian Senate, some members of the UK House of Lords); and hereditary membership (historical House of Lords). Each method produces a chamber with a different relationship to democratic accountability, and consequently a different role in the legislative process.

### 3.2 Parliamentary Authority: A Typology

Comparative constitutionalism identifies four broad categories of parliamentary authority, differentiated by the degree to which the legislature's powers are constitutionally specified and constrained (Duverger, 1980).

First, parliaments of unlimited competence — found in the United Kingdom, Ireland, and New Zealand — operate under the doctrine of parliamentary sovereignty. There is no written constitutional limit on what such a parliament may legislate. Any act of parliament is legally valid, and no court may strike it down as unconstitutional. This model maximizes legislative authority but provides minimal protection for individual rights or minority interests against majoritarian legislation. Second, parliaments of absolute limited competence — found in France (Articles 34, 35, 39, and 40 of the 1958 Constitution), Senegal, and Gabon — operate within a strictly enumerated legislative domain. The constitution specifies precisely which matters the parliament may legislate upon; all remaining matters fall within the regulatory competence of the executive. Parliamentary legislation outside this domain is subject to constitutional review and invalidation.

Third, parliaments of relative limited competence — of which the United States Congress is the paradigmatic example — operate within a broad but enumerated constitutional framework. Article I, Section 8 of the US Constitution lists eighteen specific powers of Congress, while Section 9 lists powers Congress does not possess. The Tenth Amendment reserves to the states or the people all powers not delegated to the federal government. Within this framework, however, the Necessary and Proper Clause (Article I, Section 8, Clause 18) grants Congress implied powers to enact legislation reasonably related to its enumerated functions — a provision that has been expansively interpreted by the Supreme Court over two centuries. Fourth, decorative or consultative parliaments — found in several Gulf monarchies including Qatar, Kuwait, and Bahrain — exercise minimal real legislative authority. These assemblies, sometimes called quasi-parliaments, function primarily to provide a veneer of representative legitimacy for executive or monarchical authority. Members may be elected or appointed, and the body may be dissolved and reconstituted at the ruler's discretion.

## 4. Institutional Profiles

### 4.1 The United States Congress

The United States Congress, established by Article I of the Constitution of 1787, is among the world's oldest continuously operating bicameral legislatures and the archetypal example of a presidential legislative assembly. Congress consists of two chambers: the House of Representatives and the Senate.

#### 4.1.1 The House of Representatives

The House of Representatives comprises 435 voting members apportioned among the 50 states according to population as determined by the decennial census. The number of seats was fixed at 435 by the Apportionment Act of 1911 and has remained unchanged despite a tripling of the national population — a fact that critics argue produces substantial representational distortion (Lee & Oppenheimer, 1999). Each representative serves a two-year term; all 435 seats are contested at each general election. To be elected to the House, a candidate must be at least 25 years old, a United States citizen for at least seven years, and a resident of the state they represent (U.S. Constitution, Art. I, §2). The House is presided over by the Speaker of the House, elected by the full chamber and universally drawn from the majority party. The Speaker is the most powerful figure in the House, controlling the floor agenda, committee assignments, and the legislative schedule. The Speaker is second in the presidential line of succession, after the Vice President. James Madison described the House as having "an immediate dependence on, and intimate sympathy with, the people" — a characterization that its two-year electoral cycle makes structurally accurate (Madison et al., 1788/2003, Federalist No. 52). The House possesses several constitutionally exclusive powers: the power to originate revenue bills (Art. I, §7), the power to impeach federal officials (Art. I, §2), and the power to elect the President in the event of an Electoral College deadlock (Art. II, §1; 12th Amendment).

#### 4.1.2 The United States Senate

The Senate consists of 100 members — two from each state regardless of population — serving six-year terms. One-third of Senate seats are contested every two years, a design that ensures institutional continuity across electoral cycles. Senators must be at least 30 years old, citizens for at least nine years, and residents of their state (U.S. Constitution, Art. I, §3). The Senate is presided over by the Vice President of the United States, who may cast tie-breaking votes; in the Vice President's absence, the President pro tempore presides. The Senate possesses a set of exclusive powers that make it the more powerful chamber in matters of foreign affairs and appointments: the power to ratify treaties by a two-thirds vote (Art. II, §2); the power to confirm presidential nominations to executive and judicial offices (Art. II, §2); and the sole power to try impeachments (Art. I, §3). These powers collectively give the Senate a central role in shaping the federal judiciary, the diplomatic corps, and cabinet-level executive leadership.

The Senate is also distinguished by its procedural rules, most notably the filibuster — the practice of extended debate used to delay or block legislation. The filibuster has no constitutional basis; it derives from Senate Rule XXII, which since 1975 has required a three-fifths supermajority (60 votes) to invoke cloture and end debate. The filibuster effectively raises the threshold for most major legislation from a simple majority to a 60-vote supermajority, giving the minority party substantial blocking power (Binder & Smith, 1997).

Congressional oversight of the executive branch — conducted through committee hearings, investigations, and subpoenas — is an implied but critical power. As the Supreme Court held in *McGrain v. Daugherty* (1927), the power to investigate is "an essential and

appropriate auxiliary" to the legislative function. Congressional investigations have produced landmark moments in American political history, including the Watergate hearings (1973) and the Army-McCarthy hearings (1954).

#### 4.2 The Uzbek Oliy Majlis

The Oliy Majlis (Supreme Assembly) of the Republic of Uzbekistan is the bicameral parliament established by the Constitution of 1992, substantially amended in 2023. Uzbekistan's legislative system reflects the country's hybrid constitutional model: a strong presidential executive coexists with a parliament possessing meaningful but constitutionally circumscribed authority. This semi-presidential configuration places Uzbekistan's system closer to the French Fifth Republic model than to either pure presidentialism or pure parliamentarism.

##### 4.2.1 The Legislative Chamber

The lower chamber, the Legislative Chamber (Qonunchilik palatasi), consists of 150 deputies elected through a mixed electoral system combining proportional representation with single-member constituency elections. Deputies serve five-year terms. The chamber's primary function is legislative — drafting, debating, and passing bills — and it exercises the first reading of all legislation. It also exercises budgetary powers and oversight of the executive, though the president's constitutional prerogatives limit the practical scope of this oversight.

##### 4.2.2 The Senate

The upper chamber, the Senate, consists of 100 members: 84 elected indirectly by regional representative assemblies (six from each of Uzbekistan's 14 regions and the Republic of Karakalpakstan), and 16 appointed by the President. The appointed presidential quota is a significant constitutional feature, as it provides the executive with direct representation in the upper chamber — a mechanism with no parallel in the US, Italian, or Japanese systems. Senators serve five-year terms. The Senate holds exclusive powers analogous to those of the US Senate: it confirms presidential appointments to senior judicial and prosecutorial positions, ratifies international treaties, and may introduce constitutional amendments. Unlike the US Senate, however, the Uzbek Senate cannot initiate ordinary legislation — a constitutional asymmetry that preserves the Legislative Chamber's primacy in the ordinary legislative process. The 2023 constitutional amendments represented a significant institutional development, extending presidential terms and adjusting the balance between branches. Critics within the comparative constitutionalism literature have noted that Uzbekistan's parliament, while formally bicameral and increasingly active, continues to operate within a constitutional framework that privileges executive authority — a pattern common to post-Soviet presidential systems (Hale, 2015; Fish, 2005).

#### 4.3 The Italian Parliament

The Italian Parliament is established by Part II, Title I of the Constitution of the Italian Republic, adopted on January 1, 1948. Italy is a unitary parliamentary republic, and the parliament holds the supreme legislative authority of the state. The Italian system is notable for its historically strict "perfect bicameralism" — a design in which the two chambers

possessed identical legislative powers — which produced decades of institutional complexity and political instability. Following a 2020 constitutional reform, the size of both chambers was substantially reduced.

#### 4.3.1 The Chamber of Deputies

The Chamber of Deputies (*Camera dei Deputati*) consists of 400 members following the 2020 reform (reduced from 630), elected for five-year terms through a mixed electoral system combining proportional representation with single-member plurality districts. Deputies must be at least 25 years old and citizens of Italy. The Chamber is presided over by its President (Speaker). Together with the Senate, the Chamber forms the complete legislative body of the republic, and no bill may become law without passing both chambers in identical text — a requirement that historically produced long inter-chamber revision cycles known as the *navette* (shuttling) process.

#### 4.3.2 The Italian Senate

The Senate of the Republic (*Senato della Repubblica*) consists of 200 members following the 2020 reform (reduced from 315), elected for five-year terms by citizens aged 25 and over. An additional category of senators-for-life exists former Presidents of the Republic automatically become senators-for-life, and the President of the Republic may appoint up to five distinguished citizens as senators-for-life. Italy's Senate is thus an elected body with a small, appointed component — a hybrid approach. Under Italy's historically symmetrical bicameralism, both chambers possessed identical legislative, oversight, and confidence-granting powers. The government required the confidence of both chambers simultaneously, meaning a vote of no-confidence in either chamber would bring down the government. This arrangement — unique among major democracies — contributed to Italy's famous governmental instability: between 1948 and 2023, Italy had over 65 governments, averaging less than two years per government (Pasquino, 2007). The Italian Parliament also plays a distinctive role in judicial appointments: the Constitutional Court, which exercises constitutional review, consists of 15 judges, five appointed by the President of the Republic, five by the Parliament in joint session, and five by the Supreme Courts. This arrangement embeds the legislature directly in the constitution of the judiciary in a manner without parallel in the other systems examined here.

#### 4.4 The Japanese National Diet

The National Diet (*Kokkai*) of Japan is established by Chapter IV (Articles 41-64) of the Constitution of Japan, enacted in 1946 under American occupation and in force since May 3, 1947. Japan is a unitary constitutional monarchy with a parliamentary system of government. The emperor is the symbolic head of state; real political authority rests with the elected government headed by the Prime Minister, who must command the confidence of the Diet. Article 41 of the Constitution designates the Diet as "the highest organ of state power" and "the sole law-making organ of the State" — the broadest formal grant of legislative supremacy among the four systems examined here.

#### 4.4.1 The House of Representatives

The House of Representatives (Shugiin) consists of 465 members elected for four-year terms through a mixed electoral system: 289 seats are elected by single-member plurality districts, and 176 seats are allocated by proportional representation across 11 regional blocs. Members must be at least 25 years old. The House of Representatives is constitutionally designated the more powerful chamber: in cases of disagreement between the two chambers, the House of Representatives' position prevails after prescribed joint committee procedures (Constitution of Japan, Art. 59-60). The House also holds the exclusive power to pass the budget if the House of Councillors fails to act within 30 days (Art. 60).

#### 4.4.2 The House of Councillors

The House of Councillors (Sangiin) consists of 248 members serving six-year terms, with half the membership elected every three years. Like the US Senate, the staggered electoral cycle provides continuity across parliamentary cycles. Members must be at least 30 years old. The House of Councillors reviews all legislation passed by the lower chamber and may propose amendments, but cannot permanently block legislation — the House of Representatives may override a Councillors' rejection by a two-thirds majority in the lower chamber (Constitution of Japan, Art. 59). Japan's bicameral system is thus asymmetric in the opposite direction from its American counterpart: whereas the US Senate is in many respects the more powerful chamber (holding exclusive treaty ratification and confirmation powers), Japan's House of Representatives clearly dominates. This asymmetry was deliberately built into Japan's postwar constitution to prevent the recurrence of the wartime imperial system in which the House of Peers (the predecessor to the House of Councillors) had been dominated by appointed aristocrats and military figures hostile to popular democracy (Stockwin, 2008).

### 5. Comparative Analysis

#### 5.1 Comparative Overview Table

Criterion	USA (Congress)	Uzbekistan (Oliy Majlis)	Italy (Parliament)	Japan (Diet)
Type	Bicameral	Bicameral	Bicameral	Bicameral
Lower chamber	House of Reps. (435)	Legislative Chamber (150)	Chamber of Deputies (630)	House of Reps. (480)
Upper chamber	Senate (100)	Senate (100)	Senate (315)	House of Councillors (248)
Lower term	2 years	5 years	5 years	4 years
Upper term	6 years	5 years	5 years	6 years
System type	Presidential	Presidential-Parliamentary	Parliamentary (Republic)	Parliamentary (Monarchy)
Constitution	1787 (amended)	1992 (amended)	1948	1947

year		2023)		
Impeachment	House charges, Senate tries	Constitutional Court	Parliament votes, Constitutional Court tries	Not applicable
Treaty ratification	Senate (2/3 vote)	Both chambers	Both chambers	House of Reps. (primary)
Judicial appointments	Senate confirms	Senate confirms	Parliament elects (1/3 each)	Cabinet appoints

**Table 1.** Comparative Overview of Parliamentary Systems: USA, Uzbekistan, Italy, and Japan.

### 5.2 Chamber Design and Electoral Systems

All four systems employ bicameral legislatures, but the rationale and design of the two-chamber structure differs markedly. In the United States, bicameralism reflects the federal constitutional bargain: the House represents citizens by population, and the Senate represents states as equal units. This dual representational logic gives the Senate a particularly strong democratic foundation — after the 17th Amendment (1913) established direct popular election of senators — while preserving the small-state protection that was indispensable to the Constitution's ratification (Rakove, 1996). In Italy and Japan, bicameralism serves a different function. Both are unitary states without the federal rationale for equal state representation. Their upper chambers were designed primarily as deliberative filters — bodies that would review and refine legislation initiated in the lower chamber. Japan's constitutional asymmetry — formally designating the House of Representatives as supreme — reflects the pragmatic lesson of prewar history: an unreformed upper chamber had enabled anti-democratic forces. Italy's historically symmetrical bicameralism, by contrast, reflected a postwar constitutional culture deeply suspicious of concentrated power in any single institution; the cure, however — two equally powerful chambers — contributed to chronic governmental instability (Pasquino, 2007).

Uzbekistan's bicameralism is the most explicitly executive-linked of the four systems. The presidential appointment of 16 senators creates a formal channel of executive influence within the legislature — a feature with no counterpart in the other three systems. While such arrangements are common in post-Soviet Central Asian constitutions, they raise legitimate questions about the independence and effectiveness of upper chamber oversight of the executive (Fish, 2005).

### 5.3 Legislative Powers and Processes

All four systems require bicameral agreement for ordinary legislation to become law, but they handle inter-chamber disagreement through different mechanisms. The United States employs conference committees — ad hoc joint bodies that negotiate a unified text when the House and Senate pass different versions of a bill. Japan allows the House of Representatives to override a Councillors' rejection by a two-thirds majority, ensuring that the lower chamber always prevails. Italy's historically identical chamber powers meant that

disagreement triggered repeated shuttling of legislation between chambers until identical texts were achieved — a time-consuming process that contributed to legislative backlog. The presidential veto, unique among the four systems to the United States, adds a third veto point in the American legislative process. After a bill passes both chambers, the President may veto it; Congress may override only by a two-thirds majority in both chambers — an extraordinarily high bar that has been cleared only about 7% of the time historically (Spitzer, 2012). This three-stage process makes the enactment of major legislation in the United States structurally more difficult than in any of the other three systems examined here. Japan's and Italy's prime ministers have no equivalent veto power; Uzbekistan's president holds a suspensive veto that the parliament may override.

The US Senate's filibuster introduces yet another distinctive feature: a 60-vote supermajority requirement to end debate on most major legislation. This mechanism has no equivalent in the other three systems, and its effect is to further raise the threshold for legislative action in the US Senate beyond what the Constitution formally requires. Critics argue that the filibuster has become a tool of routine minority obstruction rather than the deliberative safeguard originally intended (Binder & Smith, 1997).

#### 5.4 Executive Accountability and Oversight

The most fundamental difference across the four systems is the relationship between the legislature and the executive. In Japan and Italy, the executive derives its authority from the legislature and must maintain its confidence. The Prime Minister — selected by and accountable to the Diet in Japan, and to both chambers of Parliament in Italy — governs only as long as the legislature supports the government. Loss of confidence triggers the government's resignation or dissolution of the legislature and new elections. This fusion of legislative and executive authority is the hallmark of parliamentarism (Lijphart, 1999; Linz, 1990).

The United States embodies the opposite constitutional logic: strict separation of powers. The President is separately elected by the Electoral College, serves a fixed four-year term, and cannot be removed by Congress except through impeachment — a process that requires a majority vote in the House and a two-thirds majority conviction in the Senate. In practice, impeachment has never successfully removed a president; the three presidents impeached (Johnson, Clinton, Trump) were all acquitted by the Senate. The American president thus enjoys a degree of independence from the legislature unmatched in parliamentary systems.

Uzbekistan occupies an intermediate position. The President is directly elected and serves as the dominant executive authority. The parliament cannot remove the president through a confidence vote, but the Constitutional Court may rule on the constitutionality of presidential actions. In practice, the institutional culture and informal power dynamics of Uzbekistan's system place the executive firmly in the dominant position — a configuration that scholars of post-Soviet politics have described as "competitive authoritarianism" in its least consolidated form (Hale, 2015).

Congressional oversight in the United States — through committee hearings, investigations, subpoenas, and the appropriations power — represents perhaps the most institutionally developed system of legislative executive oversight among the four cases. The Senate's exclusive power to confirm judicial and executive nominees gives it a distinctive role in shaping the composition of the executive and judicial branches that has no equivalent in the parliamentary systems examined here.

#### 5.5 Discipline and Internal Governance

All four legislative systems maintain mechanisms for the discipline of their members, though these vary considerably in procedure and severity. Article I, Section 5 of the US Constitution grants each chamber the power to punish members for disorderly behavior and to expel members by a two-thirds vote — a power exercised very rarely (15 Senate expulsions and 5 House expulsions in over two centuries). Censure — formal public condemnation without removal — has been used more frequently, most memorably against Senator Joseph McCarthy in 1954.

The Italian Parliament, the Japanese Diet, and the Uzbek Oliy Majlis all possess analogous internal disciplinary mechanisms, though the comparative literature suggests that formal disciplinary action against legislative members is less common in parliamentary systems, where the party discipline enforced by the governing coalition and the threat of dissolution serve as more powerful behavioral constraints than formal censure or expulsion procedures (Gallagher, Laver & Mair, 2011).

#### 6. Discussion

The comparative analysis presented in this article reveals several overarching conclusions about the design and function of parliamentary institutions across diverse political systems.

First, bicameralism is a near-universal feature of established democracies, but its rationale and internal dynamics vary enormously. The US bicameral structure serves a federal representational function unmatched in the other three systems. Italy and Japan adapted bicameralism to unitary contexts with different results: Japan's asymmetric model produces governmental stability, while Italy's historically symmetrical model produced chronic instability. Uzbekistan's executive-linked bicameralism reflects the hybrid constitutional logic of post-Soviet transitional systems. These variations confirm Tsebelis and Money's (1997) central insight: bicameralism's effects on governance depend critically on the degree of chamber differentiation and the allocation of powers between them. Second, the relationship between the legislature and the executive is the most consequential dimension of parliamentary design. The US system's strict separation maximizes legislative independence but at the cost of governability — the possibility of divided government and legislative gridlock is structurally built in. Japan's and Italy's parliamentary systems maximize governmental accountability to the legislature but risk instability when legislative coalitions are fragile. Uzbekistan's hybrid system maximizes executive authority at the potential expense of genuine legislative oversight. Each configuration reflects a different set of constitutional priorities and historical experiences. Third, the design of procedural

mechanisms — the filibuster, the conference committee, the vote of no confidence, the legislative shuttle — shapes legislative outputs in ways that may be as consequential as the formal allocation of powers between institutions. The US filibuster's de facto 60-vote threshold for major legislation has profoundly shaped American public policy by making legislative action structurally difficult and bipartisan consensus structurally necessary. No other democratic system examined here imposes a comparable procedural barrier. Fourth, the case of Uzbekistan illustrates the challenges and opportunities of constitutional design in transitional democracies. The Oliy Majlis has gained institutional capacity and formal authority through successive constitutional reforms, and the 2023 amendments represent a significant expansion of parliamentary powers in some domains. Yet the persistence of executive dominance, the presidential appointment of senators, and the constraints on parliamentary oversight of the executive suggest that the formal constitutional architecture does not yet fully reflect genuine parliamentary power. This gap between constitutional text and political reality is a recurring theme in the comparative study of post-Soviet legislatures (Fish, 2005; Hale, 2015). Finally, the article underscores the point — familiar in comparative constitutionalism — that there is no single optimal model of parliamentary design. Each of the four systems examined here has produced stable democratic governance (in varying degrees) while reflecting the specific historical, cultural, and political conditions of its society. The US model's durability across 235 years owes much to a constitutional culture of judicial review and institutional respect, not merely to the design of Congress itself. Japan's stable parliamentary democracy since 1955 reflects both constitutional design and the dominance of a single-party system for much of that period. Italy's institutional reforms, culminating in the 2020 chamber size reduction, represent a gradual process of constitutional adaptation to changing democratic demands. And Uzbekistan's evolving parliamentary system reflects a society in active constitutional transition whose ultimate institutional destination remains genuinely uncertain.

## **7. Conclusion**

This article has examined the concept of parliament and parliamentarism through a comparative analysis of four national legislatures: the United States Congress, the Uzbek Oliy Majlis, the Italian Parliament, and the Japanese National Diet. Beginning with the etymological and conceptual foundations of the legislative assembly, the article traced the development of bicameralism from its medieval English origins through its global diffusion and situated each national legislature within a typology of parliamentary authority and governmental systems.

The comparative analysis demonstrates that while all four systems share a commitment to representative democratic governance and bicameral legislative design, they differ substantially across every major institutional dimension: chamber composition, electoral systems, member qualifications, the allocation of powers between chambers, the relationship between the legislature and the executive, and the mechanisms of member discipline and oversight. These differences are not arbitrary; they reflect deliberate

constitutional choices shaped by historical experience, political compromise, and evolving democratic norms.

The US Congress, with its strict separation of powers, powerful Senate, and procedurally demanding legislative process, maximizes checks on governmental action at the cost of legislative efficiency. The Italian Parliament's symmetrical bicameralism prioritized distributed power over governmental stability, with consequences that have required ongoing constitutional reform. The Japanese Diet's asymmetric bicameralism combined parliamentary accountability with a clear hierarchy of chamber authority, producing relative governmental stability within a parliamentary framework. And Uzbekistan's Oliy Majlis reflects the challenges of building genuine parliamentary authority within a constitutional system that continues to privilege presidential executive power. For scholars, constitutional designers, and democratic practitioners, these comparative insights carry practical implications. The design of legislative institutions matters — not only for the efficiency and effectiveness of lawmaking, but for the depth and durability of democratic governance itself. As democratic systems worldwide face challenges from populist movements, executive aggrandizement, and institutional erosion, the comparative study of parliaments — their structures, powers, and procedures — offers essential resources for understanding, defending, and reforming democratic institutions. Future research should extend this comparative analysis to include additional cases — particularly from the Global South and from systems undergoing democratic transition — and should pay closer attention to the informal norms and political cultures that shape how formal parliamentary institutions function. The gap between constitutional text and political reality, illustrated most starkly in the Uzbek case, remains one of the most important and underexplored frontiers in comparative legislative studies.

#### REFERENCES:

- Binder, S. A., & Smith, S. S. (1997). *Politics or principle? Filibustering in the United States Senate*. Brookings Institution Press.
- Bogdanor, V. (Ed.). (1988). *Constitutions in democratic politics*. Gower.
- Bryce, J. (1921). *Modern democracies* (Vol. 1). Macmillan.
- Constitution of Italy (1948). *Costituzione della Repubblica Italiana*. Official Gazette of the Italian Republic.
- Constitution of Japan (1946). *Nihonkoku Kenpō*. Official Gazette of Japan.
- Constitution of the Republic of Uzbekistan (1992, as amended 2023). Oliy Majlis of the Republic of Uzbekistan.
- Constitution of the United States (1787, as amended). National Archives of the United States.
- Duverger, M. (1980). A new political system model: Semi-presidential government. *European Journal of Political Research*, 8(2), 165–187. <https://doi.org/10.1111/j.1475-6765.1980.tb00569.x>

- Fish, M. S. (2005). *Democracy derailed in Russia: The failure of open politics*. Cambridge University Press.
- Gallagher, M., Laver, M., & Mair, P. (2011). *Representative government in modern Europe* (5th ed.). McGraw-Hill.
- Hale, H. E. (2015). *Patronal politics: Eurasian regime dynamics in comparative perspective*. Cambridge University Press.
- Huntington, S. P. (1991). *The third wave: Democratization in the late twentieth century*. University of Oklahoma Press.
- Lee, F. E., & Oppenheimer, B. I. (1999). *Sizing up the Senate: The unequal consequences of equal representation*. University of Chicago Press.
- Lijphart, A. (1999). *Patterns of democracy: Government forms and performance in thirty-six countries*. Yale University Press.
- Linz, J. J. (1990). The perils of presidentialism. *Journal of Democracy*, 1(1), 51–69. <https://doi.org/10.1353/jod.1990.0011>
- Madison, J., Hamilton, A., & Jay, J. (2003). *The federalist papers* (C. Rossiter, Ed.). Signet Classics. (Original work published 1788)
- *McGrain v. Daugherty*, 273 U.S. 135 (1927).
- Montesquieu, C. de S. (1989). *The spirit of the laws* (A. M. Cohler, B. C. Miller, & H. S. Stone, Trans. & Eds.). Cambridge University Press. (Original work published 1748)
- Pasquino, G. (2007). *The Italian political system*. Berghahn Books.
- Rakove, J. N. (1996). *Original meanings: Politics and ideas in the making of the Constitution*. Alfred A. Knopf.
- Rials, S. (1980). *La déclaration des droits de l'homme et du citoyen*. Hachette.
- Russell, M. (2013). *The contemporary House of Lords: Westminster bicameralism revived*. Oxford University Press.
- Shugart, M. S., & Carey, J. M. (1992). *Presidents and assemblies: Constitutional design and electoral dynamics*. Cambridge University Press.
- Spitzer, R. J. (2012). *The presidential veto: Touchstone of the American presidency*. State University of New York Press.
- Stockwin, J. A. A. (2008). *Governing Japan: Divided politics in a resurgent economy* (4th ed.). Blackwell.
- Tsebelis, G., & Money, J. (1997). *Bicameralism*. Cambridge University Press.