

Re-telling the tale

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Abstract

This article responds to a reply by Bishop Pierre Whalon (in *Theology*) to an article originally published in the *Ecclesiastical Law Journal* in 2008. It aims to correct misunderstandings and misrepresentations and to refute criticisms of the original article. In doing so, it draws on recently published contributions to debate about the ‘polity’ of The Episcopal Church. The article also describes the context in which Whalon’s reply has been written and explains why the sentence of ‘deposition from the ordained ministry’ cannot be regarded as the equivalent of the withdrawal of a bishop’s licence.

Keywords

America, bishops, deposition, dioceses, Episcopal, polity, Whalon

Introduction

My article ‘A Tale of Two Churches: The Ecclesiologies of The Episcopal Church and the Church of England Compared’,¹ published in January 2008, forms part of a larger project exploring the American church’s history and ecclesiology in order to illuminate the recent disputes within it and the crisis in the Anglican Communion that they have prompted. Two further articles, ‘The Baptismal Revolution in the American Episcopal Church: Baptismal Ecclesiology and the Baptismal Covenant’² and ‘Two Streams Mingling: The American Episcopal Church in the Anglican Communion’,³ have appeared in 2010 and 2011. I am indebted to Pierre Whalon for publishing his reply to my 2008 article not in either of the academic journals in which it appeared but in *Theology*, thereby drawing my work to the attention of a much wider audience. However, as he significantly misunderstands and misrepresents an article that most of his readers will not have read, a reply was deemed necessary.

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Context

Since 2003, what Bishop Whalon calls a 'schism' (p. 5) has been unfolding in The Episcopal Church (TEC). By July 2007 about 45 congregations had voted to withdraw – including, in 2006, 13 in the Diocese of Virginia alone.⁴ Official statistics later indicated that Virginia lost 13 per cent of its 'baptized members' that year, bringing the number below that of Haiti.⁵ (Virginia was numerically the largest diocese represented in the 2006 General Convention, however. On the measure I used, Texas is now the largest with 66,618 communicants; Virginia has 65,717, Haiti just 20,254.⁶) When my article went to press the secession of dioceses still lay over the horizon. An updated version published later in 2008 recorded that in December 2007 the San Joaquin Diocesan Convention removed all references to TEC from its Constitution and Canons.⁷ The Pittsburgh, Quincy and Fort Worth Conventions voted to secede in October and November 2008. By February 2010, TEC had deposed three bishops and 170 clergy from the ordained ministry, while nine bishops and more than 170 clergy had been treated as having 'renounced the ordained Ministry of this Church' and accordingly 'removed from the ordained Ministry'.⁸ TEC has established structures for the minorities that claim to be the continuing dioceses. (The TEC diocese of San Joaquin had 2,246 'baptized members' in 2008, 22 per cent of the 2007 figure of 10,276.⁹) Lawsuits about ownership of buildings and other assets worth hundreds of millions of dollars have ensued. By 2010 the Diocese of Virginia alone had spent \$3.5 million (from a \$4 million 'line of credit') on legal expenses.¹⁰ The Presiding Bishop's Office had spent \$5,309,480.¹¹

Since 2008 these disputes have prompted extensive discussion by lawyers, historians and bishops about the 'polity' of TEC, and in particular the relationships between, and rights of, congregations, dioceses and the 'general church'.¹² In 2010 TEC published an edited version of James Dator's 1959 thesis on the subject, lightly revised to take account of subsequent developments (though not subsequent literature).¹³ In the fog of war, truth is usually the first casualty (and in ecclesiastical strife, Christian charity is often the second). Publications on both sides range from scholarly writing, some of which succeeds almost entirely in freeing itself from the constraints of the context in and for which it was written, to pure propaganda that makes no pretence to dispassionate, intellectually rigorous analysis. Dator suggests that one explanation for the existence of 'contradictory opinions' in older writing is that 'some of the crucial points concerning the church's constitutional structure are genuinely open to varying interpretations because the facts about them are inconclusive'.¹⁴ Many of the less academic writers in the current dispute represent the position as being more unequivocal than it actually is.

Choosing bishops

Whalon's opening remarks about the Church of England ignore recent developments in the choosing of bishops. As the Prime Minister now plays no active role, it is not true in any sense that diocesan bishops 'continue to be appointed' (p. 3).

Fascinated by the formal process involving the Crown, Whalon has not noticed that it is now exactly that – a formal process whereby the man chosen by the church becomes bishop. In the Anglican Communion, diocesan bishops are either elected by their synod (or convention) or chosen by an electoral college comprising diocesan and wider church representatives. The Church of England's Crown Nominations Commission is smaller than other electoral colleges, but not fundamentally different. It is not the 'manner of selection' but merely the ensuing formalities that now mark the Church of England out from other Anglican churches.

History and story

The historical sections of my article were supported by 39 references – to eight books and four articles by 12 American Episcopalian scholars. By contrast, Whalon's corresponding account, which diverges from the scholarly consensus, is almost entirely unsupported by references or evidence. Three examples must suffice.

I observed that 'under British rule there was neither a consensus in the American church in favour of the introduction of episcopacy nor a consensus among those who did favour it as to what the role of an American bishop should be'.¹⁵ A footnote referred to a paragraph by Hein and Shattuck and a six-page section of F. V. Mills' *Bishops by Ballot* entitled 'Opposition to Episcopacy'. By contrast, Whalon admits of no such opposition, claiming that 'the idea of a bishop was certainly acceptable' and only 'the details caused concern' (p. 4). In the absence of evidence or reference to scholarly writing, this assertion – like many others – relies on Whalon's authority alone.

Dator (whom Whalon cites at other points) remarks that White's *The Case of the Episcopal Churches in the United States Considered* 'generally is considered to be the initial precursor to the Constitution of 1789', 'had considerable influence on subsequent constitutions' and 'hence must be examined in close detail'. 'Structurally and essentially', he concludes, 'it was White's plan that prevailed.'¹⁶ Whalon dismisses its relevance.

As I showed, White modified his original proposals significantly in response to developments – notably Seabury's consecration.¹⁷ Whalon goes further, claiming that 'White himself withdrew his essay' (p. 4). How White 'withdrew' his widely distributed pamphlet (an occurrence not mentioned by other writers) is not stated.

Ecclesiology and 'polity'

My main purpose was to suggest that, whereas the Anglican Communion engages in ecumenical dialogue as if it had a common ecclesiology, TEC's ecclesiology in fact differs markedly from that of the Church of England. This I substantiated by outlining differences in structure and governance.¹⁸ Not the least of the differences is the fact that Dator's analysis could be couched entirely in terms of secular

constitutional theory; it is ultimately about 'polity' not ecclesiology. In summary, I argued that the Church of England inherited (but has developed) the traditional catholic ecclesiology of the Western Church, whereas the 'polity' of the Protestant Episcopal Church in the USA, born out of the American Revolution, reflected a democratic and egalitarian ecclesiology – in the words of Bishop Paul Marshall, 'an American ecclesiology'.¹⁹ The leading Episcopalian historian Robert Prichard has recently echoed my theme: 'It is easy for contemporary Americans to overlook the degree to which . . . White . . . and his colleagues departed from the English model of church organization.' 'They continued to use much of the same terminology', he writes, but 'created a church quite unlike that of England'.²⁰

How far Whalon accepts this analysis is not clear. His conclusion that TEC's 'underlying ecclesiology' is 'utterly consistent with the basic principles of Anglicanism' (p. 10) suggests rejection. His undeveloped assertion that 'it was the power of the idea of episcopal leadership – the fundamental catholic ecclesiology of the English Church . . . – that enabled the development of a genuine American episcopacy' (p. 4) downplays the differences. So does his (contestable) claim that 'Episcopal Church polity broadly imitated the Elizabethan Settlement, keeping the episcopacy but giving the lay monarch's role to voting bodies' (p. 6).

Some indications point the other way, however. Whalon accuses me of not raising Newman's criticism of 'the power usurped by the laity over the bishop's jurisdiction'. (In fact, I quoted that very phrase, and the role of the laity was a recurrent theme of my article.²¹) His suggestion that this is 'on the surface at least, one of the most important distinctions' between the churches (p. 6) leaves open whether the difference is, as I argue, fundamental (though moderated by later developments) or merely superficial. His statements that TEC 'makes its decisions by ballot' and is 'a democratically orientated church, where my vote is as good as your vote' (p. 10) clearly accord with my thesis.

I pointed out that in the Church of England the dioceses predate the parishes, whereas in The Episcopal Church, which was 'constructed from below', the original congregations predated the dioceses. This historical analysis (which Whalon appears to accept) I summarized as follows: 'The state churches (later called dioceses) and the General Convention were constituted in the 1780s by pre-existing parishes and congregations uniting in "voluntary associations", and, *in that sense*, the congregations are the fundamental units of The Episcopal Church – precisely the opposite of the position in the Church of England.'²² By extracting that sentence from its context and quoting only the last part, omitting 'in that sense', Whalon makes my comment appear general rather than historical and calls it 'perhaps the basic misunderstanding' of my article (p. 5). Later, however, he quotes with apparent agreement (p. 5) a similar comment in which I highlighted the tension resulting from the congregations being historically the 'fundamental units' of what became a unitary church. Whalon mistakenly claims that 'Dr Podmore argues that . . . episcopacy in The Episcopal Church complements an essentially congregational polity' (p. 3) – without asking himself how I could at the same time 'understand correctly that [TEC] has a unitary polity' (p. 5).

In fact, my conclusion was more subtle, following Dator in describing TEC as ‘a unitary body’ with ‘a highly decentralised structure and strongly confederal characteristics’.²³ Mark McCall’s essay ‘Is The Episcopal Church Hierarchical?’, written from the perspective of American law, takes a different view from Dator, who wrote from that of American political science. In the light of McCall’s analysis, which stresses dioceses’ rights, I would now qualify the term ‘unitary body’ further.

The General Convention and the dioceses

Whalon applies the 20th-century concept of ‘subsidiarity’ (whereby decisions are delegated to the most appropriate level) to what (at this point in his piece) he agrees with William Franklin is ‘an eighteenth-century institution’, but he avoids a key question central to current disputes. In TEC, does power flow from below or from above? Are powers delegated upwards to ‘a central ecclesiastical government’ only when they ‘cannot be conveniently exercised by the clergy and laity, in their respective congregations’, as envisaged in articles approved by four state conventions in the 1780s, which Whalon quotes (p. 9)?²⁴ Or is the General Convention ‘a government practising subsidiarity’ by delegating powers downwards?

Again, Whalon is ambivalent. His claim that ‘the General Canons allow dioceses to have their own constitution and canons’ suggests downward delegation. (In fact, the Canons are silent. They do not ‘allow’ diocesan conventions to be legislative bodies; rather, as Robert Prichard has written, ‘the national General Convention assumed the existence of diocesan constitutions . . . and canons’.²⁵) Whalon’s comparison of TEC’s Constitution with the Articles of Confederation, which emphasized states’ rights, tends in the opposite direction, however. Dator argues that White ‘did *not* follow the obvious model of the Articles of Confederation’.²⁶ It is McCall (who disagrees with the interpretation favoured by TEC’s current leadership) who, like Whalon, draws parallels between the Constitution of the General Convention and the Articles of Confederation.²⁷

In the House of Deputies, on important questions each diocesan deputation has a single ‘block vote’ in each ‘Order’ (clergy and lay), a majority of diocesan deputations rather than of individual members being required. From this I concluded that the House of Deputies is ultimately ‘an assembly of deputations of diocesan churches’, suggesting a ‘lack of weight or “ecclesial density” at the national level’.²⁸ As internet search engines confirm, the term ‘ecclesial density’, introduced by Harding Meyer in 1980,²⁹ has become a commonplace of ecclesiological discussion. Its use in an academic discussion of ecclesiology seemed unproblematic; glossing it with the word ‘weight’ would make its meaning obvious. Unfamiliar with it, Whalon guesses wrongly at its meaning, however (p. 5). In essence, I said in ecclesiological language what Dator says in the language of ‘polity’: this voting procedure ‘has attributes that indicate the possibility of a federal or confederal government’.³⁰

The issue of relations between the dioceses and the General Convention is posed most sharply in the question of secession. Dator is clear that whether dioceses can

'nullify' acts of the General Convention and whether they can secede are separate questions. He admits that the answer to the second is 'more involved', noting a diversity of views in the later 19th century. His conclusion that 'There has never been anything in the Constitution of the church which allowed, or reasonably could be inferred to allow, a diocese...to secede from the church against General Convention's will' is arguably his weakest, being essentially a conclusion from silence.³¹ I asked, 'Is being "admitted into union with the General Convention" a one-way ticket, or is a return journey possible?',³² but did not pre-empt the judgment of the courts.

Whalon's paragraph on the subject (p. 5) is highly problematic. As I showed, the General Convention does not create dioceses. Rather, they form themselves with its consent, adopt a constitution that accedes to the General Convention's Constitution and Canons, and are then 'admitted into union with the General Convention'.³³ Whalon does not argue with this, yet asserts that the General Convention 'created' certain dioceses (p. 11, n. 9). He seeks to justify his assertion that 'in accepting the 1789 Constitution, the original conventions irrevocably ceded their independence' by reference to a provision that General Convention decisions are binding on dioceses whose deputations are absent. However, not sending representatives is different from seceding. Whalon's talk of 'a concerted effort – mainly through recourse to the secular courts – to prove that the dioceses of The Episcopal Church are autonomous' is doubly misleading. First, though one seceding diocese (Quincy) has sought to secure its position legally, in the other cases it is the minority loyal to TEC that has had 'recourse to the secular courts', the TEC Fort Worth website describing such legal action as 'holy stewardship'.³⁴ Second, the claim is not that dioceses are autonomous while in union with the General Convention, but that they can secede. Whalon's reference in this context to Dator's conclusion (which my article echoed) that the General Convention's power is unlimited would only be relevant if the General Convention had used such power to enact a constitutional provision forbidding secession.

Bishops

My article argued that the role of diocesan bishops is weaker in TEC than in the Church of England. Once again, the reader is left unclear as to how far Whalon agrees. He seeks to minimize or explain away differences, but then complains that 'Podmore does not make due allowance for the fact that the structures of The Episcopal Church were created, among other things, to limit the power of bishops, in deference to colonial tradition' (p. 7) – restating my own argument while accusing me of not allowing for it. He offers no evidence to support his rejection (p. 7) of my argument that 19th-century high-churchmanship 'left its mark on episcopacy' but effected only 'relatively minor adaptations to a structure that was and remained primarily the creation of the American Revolution'.³⁵ Rejecting F. V. Mills' description of an American bishop as 'an elected official of a convention of clergy and laity', Whalon ignores Dator's assessment: 'While

it is not unusual for the catholic episcopate to be canonically defined, it is unusual to find the canons subjecting bishops to such considerable control (both in the election and continuance in office) by lesser clergy and the laity.³⁶ He rejects any suggestion that bishops are ‘constrained by the actions of their conventions’ (p. 8), yet accepts that diocesan conventions are legislative bodies and does not contest my point that in most the bishop has no veto. My example from San Joaquin was not intended as evidence that diocesan conventions can direct their bishops. I merely observed that in England it would be inconceivable for a motion purporting to ‘direct the bishop’ to be moved at all, let alone command an overwhelming majority, and that this occurrence in one of TEC’s most catholic dioceses suggested a different understanding of episcopacy among its members.³⁷

Whalon downplays the role of diocesan standing committees. Regarding ordination, they do not merely ‘concur with the bishop’s decision, validating that the canonical process in question has been followed correctly’ (pp. 7–8). Having reviewed documents including an evaluation, they positively ‘recommend ordination’. Without such recommendation the bishop cannot ordain.³⁸ During a vacancy the Standing Committee has the authority to ‘authorize and request the President of the House of Bishops of the Province to take order for an ordination’.³⁹

Canon III.9.3 of the General Convention does not, in the case of appointees already canonically resident in the diocese, support Whalon’s claim that ‘parishes must obtain the bishop’s acceptance of a new rector and assistant and a bishop may choose not to give it’ (p. 7). I understand, however, that some diocesan canons give the bishop such a right. As I pointed out, despite its name, the ‘Letter of Institution’ does not confer office, and in the ‘Celebration of a New Ministry’, the bishop does not bestow the cure of souls.⁴⁰ Whalon is unable to quote any phrase that substantiates his claim that the Letter ‘makes clear’ that ‘rectors serve as the bishop’s delegates’. I overlooked the Prayer Book provision that gives the bishop the right to preside and preach at the Eucharist throughout his diocese on all occasions, but Whalon has offered no evidence to qualify my judgement that in the canons and Prayer Book there is ‘little sense of the bishop as . . . the principal minister on whose behalf his priests preside, the chief pastor whose cure of souls they share’. Despite my statement that ‘priests are obliged to obey a woman bishop’s pastoral direction’,⁴¹ Whalon misrepresents my observation that the absence of an oath of canonical obedience absolves traditionalists from having to *swear* canonical obedience to a woman bishop as claiming that they do not *owe* such obedience (p. 7).

Deposition

My article repeated a point made by the leading ecclesiastical lawyer Norman Doe that TEC lacks a sentence of deprivation from office without deposition from ordained ministry. Whalon claims that I ‘misunderstand “deposition”’, which he explains as ‘a prohibition on the exercise of ministry, similar to the withdrawal of the bishop’s licence’ (p. 7). According to the Canons, by deposition a cleric is

'deprived of the right to exercise the gifts and spiritual authority of God's word and sacraments conferred at ordination'⁴² – absolutely, not just in a particular diocese. Though the statement that 'A Member of the Clergy deposed from any order of ordained ministry is deposed entirely from the ordained ministry'⁴³ will be deleted from 1 July 2011, deposition will still have that effect: the sentence may be 'remitted and terminated', but where deposition was for 'abandoning the communion of this Church', only if 'the person has lived in lay communion with this Church for not less than one year next preceding application for the Remission'.⁴⁴ The Canons originally used the term 'degraded', and from 1832 to 1904 explained that 'deposition, displacing, and all like expressions are the same as degradation'. The official commentary notes that 'various terms are used in the ancient canons to signify a removal from the ministry', including 'reduced to lay communion'; these terms 'meant the same thing'.⁴⁵ It would seem most appropriate to describe deposition as a form of (reversible) laicization. Laicization, reversible or otherwise, does not touch the indelibility of orders, but it is not the equivalent of withdrawal of a bishop's licence, which leaves the person concerned a member of the clergy capable of receiving a licence or permission to officiate from another bishop.

Taking the discussion forward

Whalon comments that various 'failings' in the practice of episcopacy in The Episcopal Church 'can give rise to the impressions that Colin Podmore, among many, has expressed'. My article was not based on 'impressions' but on the work of American Episcopalian historians and on my own reading of the Constitution and Canons of the General Convention (detailed references in 36 footnotes) and the American Prayer Book (five footnotes). I would welcome any correction of my points that is based on discussion of the references that I cited to support them.

It was, in fact, precisely with regard to the *practice* of episcopacy – as distinct from the constitutional, canonical and liturgical provision for it – that I lacked information. (Dator similarly did not attempt to comment on 'behavior within that framework'.⁴⁶) I would welcome a response focusing on how episcopacy is actually practised in TEC today.

As diocesan conventions are legislative bodies, episcopal powers differ, to some extent, from diocese to diocese. Dator noted the lack of 'a good analytical study of the governing role of bishops in their diocesan situation' and 'adequate careful studies of diocesan constitutions, canons, and conventions... Standing Committees and their actual relations to the episcopate, and their interaction ... between the bishops and the clergy and the laity'.⁴⁷ I would welcome a response indicating how the framework set by the General Convention is varied locally.

My article has received warm affirmation from a number of American Episcopalian historians as well as from English clergy working in TEC and American clergy working here. Pierre Whalon's reply is the only negative reaction I have received. I hope that this response will clarify matters and contribute to taking the discussion forward.

Notes

1. *Ecclesiastical Law Journal*, 10 (2008), pp. 34–70 and (slightly updated) *International Journal for the Study of the Christian Church*, 8 (2008), pp. 124–54. Subsequent references are to the latter, which is available at <http://www.informaworld.com/smpp/content~db=all~content=a792966616~frm=titlelink>.
2. *Ecclesiology*, 6 (2010), pp. 8–38, available at <http://www.ingentaconnect.com/content/brill/ecso/2010/00000006/00000001/art00003>.
3. *Journal of Anglican Studies*, 9 (2011), available at <http://journals.cambridge.org/action/displayIssue?jid=AST&tab=firstview>.
4. ‘A Tale’, p. 132.
5. 2005 – 90,716; 2006 – 78,838: ‘Baptized Members by Province and Diocese: 1998–2008’: http://ecusa.anglican.org/documents/Baptized_Members_by_Province_and_Diocese_1998-2008.pdf, accessed 20 March 2010.
6. ‘Table of Statistics of the Episcopal Church from 2008 Parochial Reports... as of January 2010’: http://www.episcopalchurch.org/documents/2008_Table_of_Statistics_of_the_Episcopal_Church.pdf, accessed 30 March 2010.
7. ‘A Tale’, p. 132 (the clause ‘the amendments being subject to confirmation at the 2007 convention’ should have been deleted).
8. Paper by Simon Sarmiento (prepared with the assistance of the Presiding Bishop’s Chancellor and her Special Counsel for Property Litigation and Discipline), 4 February 2010: <http://thinkinganglicans.org.uk/uploads/ashworthrebuttaltec.html>, accessed 2 June 2010.
9. ‘Baptized Members by Province and Diocese: 1998–2008’; communicants: 1795 (‘Table of Statistics... from 2008 Parochial Reports’).
10. *Washington Times*, 22 February 2010: <http://www.washingtontimes.com/news/2010/feb/22/virginia-episcopalians-backpedal-on-gay-unions>.
11. http://www.episcopalchurch.org/documents/2010_Adopted_Budget_with_Description.pdf, accessed 31 March 2010, p. 1: Legal Assistance to Dioceses (2007–2009 triennium preliminary).
12. Publications include:
 - M. McCall, ‘Is The Episcopal Church Hierarchical?’ (Anglican Communion Institute, 2008): http://www.anglicancommunioninstitute.com/wp-content/uploads/2008/09/is_the_episcopal_church_hierdoc.pdf;
 - J. R. Gundersen, ‘A Response to Mark McCall’s “Is The Episcopal Church Hierarchical?”’ (Progressive Episcopalians of Pittsburgh, 2008): <http://progressiveepiscopalians.org/html/mccall.pdf>;
 - ‘Bishops’ Statement on the Polity of the Episcopal Church’ (Anglican Communion Institute, 2009): http://anglicancommunioninstitute.com/wp-content/uploads/2009/04/bishopsstatement_pdf.pdf;
 - ‘Statement of Dr Robert Bruce Mullin on behalf of The Episcopal Church and the Episcopal Diocese of Ohio’ (2008): <http://thinkinganglicans.org.uk/uploads/mullin01.pdf>;
 - ‘First Affidavit of Dr Robert Bruce Mullin’ (Episcopal Diocese of Fort Worth, 2009): [http://www.episcopaldiocesefortworth.org/holystewardshipfiles/misc%20pdfs/Aff.%20Mullin%201%20\(TEC%20Polity\).pdf](http://www.episcopaldiocesefortworth.org/holystewardshipfiles/misc%20pdfs/Aff.%20Mullin%201%20(TEC%20Polity).pdf); all accessed 16 May 2010.
13. J. Dator with J. Nunley, *Many Parts, One Body: How the Episcopal Church Works* (New York, NY: Church Publishing, 2010).
14. Dator, *Many Parts*, p. 4.
15. ‘A Tale’, p. 135.
16. Dator, *Many Parts*, pp. 18–19, p. 22 n. 35.

17. 'A Tale', pp. 136–8.
18. 'A Tale', pp. 124–5.
19. P. V. Marshall, *One, Catholic, and Apostolic: Samuel Seabury and the Early Episcopal Church* (New York, NY: Church Publishing, 2004), p. 53 (chapter title: 'The search for an American ecclesiology').
20. R. W. Prichard, 'The Making and Re-Making of Episcopal Canon Law' [2010], p. 2: <http://www.anglicanunioninstitute.com/wp-content/uploads/2010/02/conference-talk2010.pdf>, accessed 10 April 2010.
21. 'A Tale', p. 150.
22. 'A Tale', p. 129 (italics added).
23. 'A Tale', p. 130; cf. Dator, *Many Parts*, p. 144.
24. Dator, *Many Parts*, p. 24.
25. Prichard, 'The Making and Re-Making of Episcopal Canon Law', p. 5 (italics added).
26. Dator, *Many Parts*, p. 21 n. 28 (italics in original).
27. McCall, 'Is The Episcopal Church Hierarchical?', pp. 12, 21.
28. 'A Tale', p. 130.
29. M. Root, 'Christian World Communions and the CUV Process', *Ecumenical Review*, 50 (1998), pp. 330–7, at p. 16.
30. Dator, *Many Parts*, p. 71.
31. Dator, *Many Parts*, pp. 117–25.
32. 'A Tale', p. 132.
33. 'A Tale', p. 131.
34. <http://episcopaldioocesefortworth.org/holystewardship.htm>, accessed 10 April 2010.
35. 'A Tale', p. 140.
36. Dator, *Many Parts*, p. 83.
37. 'A Tale', p. 144.
38. *Constitution and Canons, together with the Rules of Order, for the government of the Protestant Episcopal Church in the United States of America, otherwise known as The Episcopal Church*, accessed from http://www.episcopalarchives.org/CnC_ToC_2009.html, 11 April 2010: Canon III.6.6.
39. Canon III.5.1(c) – italics added.
40. 'A Tale', p. 141.
41. 'A Tale', p. 145.
42. Canon IV.15 (from 1 July 2011, Canon IV.2).
43. Canon IV.12.1(d).
44. Canon IV.13 (from 1 July 2011, Canon IV.18.5).
45. E. A. White and J. A. Dykman, *Annotated Constitution and Canons for the Government of the Protestant Episcopal Church in the United States of America otherwise known as The Episcopal Church, adopted in General Conventions 1789–1979* (New York, NY: Church Publishing, 1981), pp. 1101–4.
46. Dator, *Many Parts*, p. 144.
47. Dator, *Many Parts*, pp. 88–9 n. 42.

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