ject matter, the effective date of congressional pay raises, the adoption of this provision has unsettled much of the supposed learning on the issue of the timeliness of pendency of constitutional amendments.

It has been accepted that Congress may, in proposing an amendment, set a reasonable time limit for its ratification. Beginning with the Eighteenth Amendment, save for the Nineteenth, Congress has included language in all proposals stating that the amendment should be inoperative unless ratified within seven years.[26] All the earlier proposals had been silent on the question, and two amendments proposed in 1789, one submitted in 1810 and another in 1861, and most recently one in 1924 had gone to the states and had not been ratified. In *Coleman v. Miller*,[27] the Court refused to pass upon the question whether the proposed child labor amendment, the one submitted to the states in 1924, was open to ratification thirteen years later. This it held to be a political question that Congress would have to resolve in the event three-fourths of the states ever gave their assent to the proposal.

In *Dillon v. Gloss*,[28] the Court upheld Congress's power to prescribe time limitations for state ratifications and intimated that proposals that were clearly out of date were no longer open for ratification. Finding nothing express in Article V relating to time constraints, the Court nevertheless found evidence that strongly suggests that proposed amendments are not open to ratification for all time or by states acting at widely separate times.[29]

Three related considerations were put forward. "First, proposal and ratification are not treated as unrelated acts but as succeeding steps in a single endeavor, the natural inference being that they are not to be widely separated in time. Secondly, it is only when there is deemed to be a necessity therefor that amendments are to be proposed, the reasonable implication being that when proposed they are to be considered and disposed of presently. Thirdly, as ratification is but the expression of the approbation of the people and is to be effective when had in three-fourths of the States, there is a fair implication that it must be sufficiently contemporaneous in that

[26] Seven-year periods were included in the texts of the proposals of the 18th, 20th, 21st, and 22d amendments. Apparently concluding in proposing the 23d that putting the time limit in the text merely cluttered up the amendment, Congress in it and in subsequent amendments included the time limits in the authorizing resolution. After the extension debate over the Equal Rights proposal, Congress once again inserted into the text of the amendment the time limit with respect to the proposal of voting representation in Congress for the District of Columbia.

[27] 307 U.S. 433 (1939).

[28] 256 U.S. 368 (1921).

[29] 256 U.S. at 374.