

doctrine encompasses the amendment process and what the standards may be to resolve that particular issue remain elusive.

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*e.g.*, “a textually demonstrable constitutional commitment of the issue to a coordinate political department; or a lack of judicially discoverable and manageable standards or resolving it.” Later formulations have adhered to this way of expressing the matter. *Powell v. McCormack*, 395 U.S. 486 (1969); *O’Brien v. Brown*, 409 U.S. 1 (1972); *Gilligan v. Morgan*, 413 U.S. 1 (1973). However, it could be argued that, whatever the Court may say, what it did, particularly in *Powell* but also in *Baker*, largely drains the political question doctrine of its force. *See Uhler v. AFL-CIO*, 468 U.S. 1310 (1984) (Justice Rehnquist on Circuit) (doubting *Coleman’s* vitality in amendment context). *But see* *Goldwater v. Carter*, 444 U.S. 996, 1002 (1979) (opinion of Justices Rehnquist, Stewart, Stevens, and Chief Justice Burger) (relying heavily upon *Coleman* to find an issue of treaty termination nonjusticiable). *Compare id.* at 1001 (Justice Powell concurring) (viewing *Coleman* as limited to its context).