There is a variety of ways in which this measurement model can be applied in future research. For use outside of judicial politics, it provides a convenient means to include controls for judicial independence. This can be applied in a comparative context and combined with ?'s measure to control for both types of judicial independence. This can also be applied as a control in a variety of policy analyses. For instance, the diffusion of same sex marriage laws and court rulings. As noted in Section ??, if a judge is fearful of electoral retribution, she may be more likely not to rule in favor of same sex marriage.