

“E Pluribus Unum”: The Language Policy in the United States

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1. Introduction

In the United States, English has represented the predominant language since the colonial period and has functioned as the de facto official language. However, English has never been designated a formal official language by the Constitution or any other laws. In contrast, 63 nations in the world name an official language in their Constitution.ⁱ Even when the Constitution does not define an official language, many countries have language laws outside of their Constitution that designate official languages.ⁱⁱ

This absence of a formal official language reflects the United States approach to its language policy. Rather than establishing an explicit language policy that chooses between language unity with a single official language and language diversity which accepts more than one language, the U.S. government has shifted its language policy flexibly to meet the demands of the ever-changing dynamics of the country, as if to balance “unity” and “diversity” represented in the country’s motto “E Pluribus Unum”. In general, co-existence of multiple languages has been accepted with tolerance. However, since the 1980s, there has been an increase in pressure to make English the official language. This movement has been pushed mainly by citizens’ action groups such as U.S. English, Inc. and U.S. English Foundation. As of April 2014, 31 states have passed legislations to make English their official language, and several other states are considering similar steps.ⁱⁱⁱ

This paper reviews the linguistic landscape of the United States and looks at the development of the U.S. language policy over time. It focuses on how linguistic tolerance and intolerance have alternated throughout history, and what factors influenced each period. It also examines the factors that prevent the designation of English as an official language at the national level despite increasing pressures in recent years, and whether this situation will continue.

Section 2 explores the current linguistic landscape of the United States, based on the data compiled by the U.S. Bureau of Census. The number of people who speak languages other than English at home and their self-rated English-speaking ability are used as measures of analysis. Most importantly, this section brings to light the uneven geographical distribution of people who speak languages other than English at home, which results in the existence of pockets of heavy non-English language

concentration in certain parts of the country.

Section 3 reviews the historical development of national sentiments and policies on language issues. It describes four different periods of distinct attitudes on the issue of language unity and diversity and shows how historical and social factors shape such attitudes. Throughout the history of the United States, a period of linguistic tolerance occurred most notably in the country’s founding years through most of the 19th century and in the mid-1960s to the 1970s. In contrast, the late 19th century to the mid- 20th century and the 1980s to present mark periods of linguistic intolerance.

Section 4 examines the factors that influence the direction and the distance of the swing of the pendulum between linguistic tolerance and linguistic intolerance, or, between diversity and unity. Three factors are analyzed: the impact of immigration, adherence to the U.S. Constitution, and the development of national values.

Finally, the paper considers the prospects for the future: whether the United States’ current lack of explicit language policy will remain viable in the future or not. What factors could force change in such a situation?

2. Current Linguistic Landscape

The United States has become a multi-linguistic country where 381 languages are spoken, according to the 2011 statistics published by the U.S. Bureau of Census in August 2013.^{iv} The U.S. Bureau of Census employs two measures to analyze the country’s linguistic landscape. One is the number of people who speak languages other than English at home, and the other is their self-rated English-speaking ability.

2.1 Language spoken at home

Of the United States’ population of 291.5 million aged 5 years or above, 21%, or 60.6 million people speak languages other than English at home. This percentage has risen from 19.3% in 2005. Compared to 1980, the number of people who speak languages other than English at home has risen by 262% from 23.1 million to 60.6 million, its proportion among the total population almost doubling from 11% to 21%.

Spanish is by far the most spoken language spoken at home besides English, accounting for 62% of foreign languages spoken at home, and showing a rapid increase from 48% in 1980. In fact, the number of Spanish speakers more than tripled between 1980 and 2011 from 11.1 million to 37.6 million people.

2.2 English-speaking ability

As for self-rated English-speaking ability, 58.2% of those who speak languages other than English at home responded that they speak English “very well”, 19.4% “well”, 15.4% “not well”, and 7.0% “not at all”. The proportion of those speaking English “very well” varies among language groups, the highest being French or German speakers at over 80%, and the lowest being Korean, Chinese, or Vietnamese

speakers at less than 50%. Among Spanish speakers, 56.3% speak English “very well” and 9.0% “not at all”.

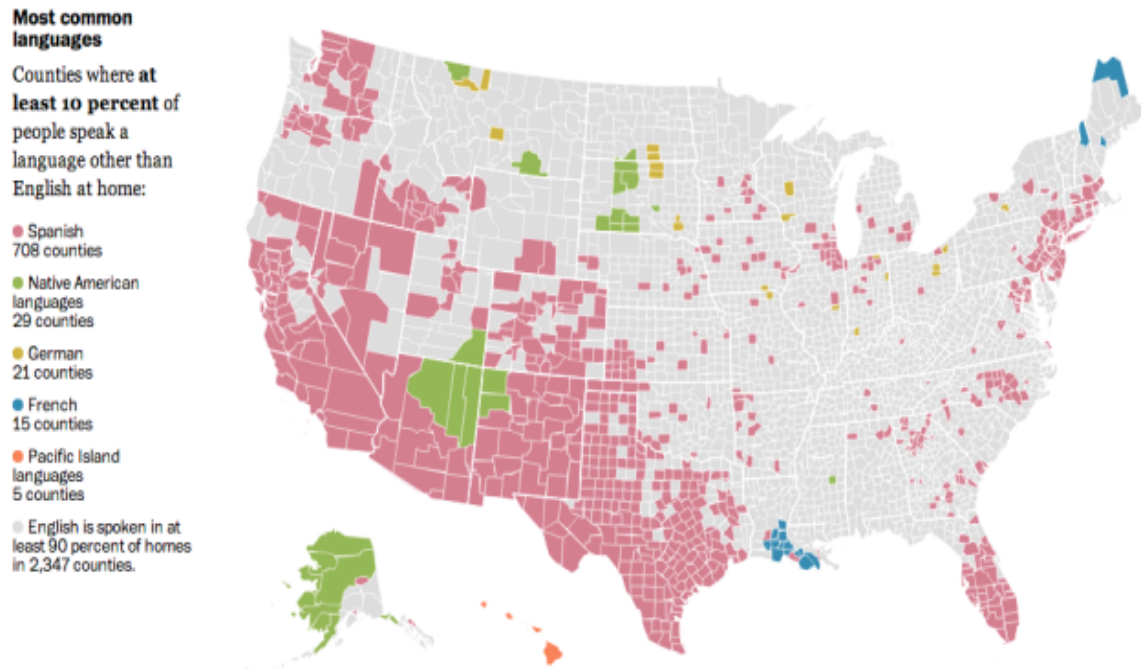
The U.S. Bureau of Census confirms that the proportion of speakers of languages other than English who speak English less than “very well” as a percentage of the total population remained the same at 8.7% between 2007 and 2011. However, there had been an increase between 2000 and 2007 from 8.1% to 8.7%. As the total population during this period showed a large increase from 210.2 million in 1980 to 291.5 million in 2011, the actual number of people who speak English less than “very well” has increased substantially.

2.3 Language concentration

The number of speakers of languages other than English at home varies greatly among different states. The states with the highest percentages of people speaking languages other than English at home include California (43.8%), New Mexico (36.5%), Texas (34.7%), New Jersey (30.4%), New York (30.1%), Florida (27.6%), and Arizona (27.0%). Most of these states are located in the Southwest. In contrast, the states with the lowest percentages include West Virginia (2.3 %), Mississippi (3.8%), Montana (4.7%), Kentucky (4.8%), Vermont (4.9%), North Dakota (5.1%), and Alabama (5.2%). These are mainly mid-Western and Southern states.

There appears to be a general but not conclusive correlation between the proportion of people who speak languages other than English at home and the average English-ability found in the state. Among the seven states with the highest percentages of people speaking languages other than English at home, while New Mexico and Arizona exceeded the national average of 58.2% of people speaking English “very well” by a significant margin (72.5% and 65.5%, respectively), California (54.7%), Texas (58.1%), New Jersey (57.4%), and New York (55.2%) lagged behind the national average. Among those with the lowest percentages of people speaking languages other than English at home, Montana (83.7%), North Dakota (71.6%), Vermont (71.4%), and West Virginia (64.7%) showed figures well above the national average, while Kentucky (58.1%), Mississippi (55.7%), and Alabama (55.4%) remained behind the national average.

According to *The Washington Post*, in over 25% of all counties in the United States, at least 10% of people speak a language other than English at home. The most common such language is Spanish, which is spoken by at least 10% of people in 708 counties, accounting for 23% of all counties. The map provides a vivid visual representation of the non-English language concentration in the United States.

Map 1: Where English is not the language at home

Source: Dan Keating and Darla Cameron for *The Washington Post* (August 20, 2013)

The concentration is even starker when analyzed on the level of metropolitan areas. According to the analysis by the U.S. Bureau of Census, in 57 metropolitan areas, 25% or more of the population speak languages other than English at home. 22 of these areas are located in California and twelve in Texas. In thirteen metropolitan areas, 50% or more of the population speak languages other than English at home, and in four metropolitan areas, three in Texas and one in California, the proportion exceeds 70%. For example, in Laredo, Texas, 92.8% of its 230,506 residents speak languages other than English at home and 91% speak Spanish at home.

3. Historical Development

Throughout the history of the United States, national sentiment on language issues and the government's language policy have shifted between tolerating multiple languages and demanding use of English only. In addition, as time progressed, the intensity of such sentiments grew and the policy became more formalized, thus making the shift wider and more divisive.

3.1 The beginning with diversity: from the colonial period to the 19th century

During the colonial period, multiple languages were in use, reflecting the large

number of Native American tribes and diverse origins of settlers coming to the New World. For example, 18 languages were spoken on Manhattan Island alone in 1664, when England bought it from the Dutch and New Amsterdam was renamed New York.^v

While English was the chosen common language at the Continental Congress during the Independence War and the nation's founding years, important documents were translated into German and French to garner support for the war from the German and French colonists. Translation into German was particularly important, as a large number of German people lived in Pennsylvania but kept to their own separate communities without assimilating to the rest of the colony.

Despite having strong feelings about establishing American English as the language of their new nation, distinct from the English spoken in England,^{vi} the Founding Fathers did not designate English as an official language. Two reasons appear likely for this refrain. First, designating English as an official language by law was thought to be unnecessary because the Founding Fathers "considered it self-evident that English would be the language of the government."^{vii} It had already been in use in the government, and English speakers formed a strong majority in the 1780s with 25 per cent of the population having English or Irish origin.

Second, the Founding Fathers "felt language to be a matter of 'individual choice'"^{viii} and a democratic government should not interfere with the matter of language. In fact, the Congress did not approve a proposal made by John Adams in 1780 to establish an official language institution called the American Academy "for refining, improving, and ascertaining the English language."^{ix} The issue of language thus was not to be under government jurisdiction.

The use of languages other than English in government continued during the 19th century on the state level, though not on the federal level. As new states joined the union one after another, many state governments retained the practice of using more than one language in their official documents. In some states, government documents were written in two languages, and in others, the state constitution was printed in more than two languages. Table 1 below shows the variety of languages used officially by various state governments. This was a period when *de facto* official languages reflected the linguistic needs of the various populations in each state.

Table 1: Use of languages other than English by state governments in the 19th century

Year	State(s)	Official documents	Languages
1812	Louisiana	All state government documents	French
1830s	Ohio, Illinois, Iowa, Wisconsin, Missouri	State legislations, Governor’s message	German
1849	California	All legislations	Spanish
1857	Minnesota	new State Constitution	German, Swedish, Norwegian, French
1875	Texas	new State Constitution	German, Spanish, Czech

3.2 The shift to unity: the late 19th century to the 1920s

The sentiments changed significantly in the late 19th century and the early 20th century away from tolerance of multiple languages to insistence on English as the only acceptable language. This shift occurred primarily due to a large inflow of “new immigrants” from Southern and Eastern Europe at the turn of the century and from China and Japan in the early 20th century, which caused apprehension among the American people. Furthermore, the beginning of World War I in 1914 stirred jingoism and anti-German feelings. As a result, between 1880 and 1924, “an ideological shift occurred with regard to language,”^x and led to two policy directions that made American ideology firmly monolingual by the 1930s.^{xi}

First, in response to large-scale immigration and to push “Americanization” of these new immigrants, English language ability was made a legal requirement for immigrants for the first time. In 1906, the Amendment to Naturalization Act made English language ability a condition for naturalization. In 1917, another step was taken when the Immigration Act of 1917 made English literacy a precondition for application for immigration itself, thereby making it impossible for non-English speakers even to file for immigration to the United States.

Second, also in line with the “Americanization movement” but more strongly due to feelings of suspicions against German people, legislations were passed in fifteen states in 1919 prohibiting the use of languages other than English in public or private gatherings. These states were mostly mid-Western states such as Ohio and Nebraska with large concentrations of German people. Furthermore, only English was allowed as the language of instruction in public schools.^{xiii}

Despite the unprecedented rise in pressure to use only English and exclude other languages during this period, English was not designated by law to be an official language. The single most important reason for this was the significant decline of immigration that had taken place before discussions of official language materialized.

In 1921 and 1924, as culmination of the Americanization movement, the New Immigration Act created the national origins quota system.^{xiii} Under this quota system, the fear for continuation of a large influx of new immigrants from undesirable countries dissipated. In fact, inflow of immigrants stagnated until 1965 when the national origins quota was abolished, and foreign born people as a percentage of the total population declined from 19% in 1910 to 4.7% in 1970.

3.3 The return to diversity and the rise of bilingualism: late 1960s to the 1970s

The 1960s marked another major shift in national sentiments on the language issue and the language policy from single language to diversity. This was largely due to the liberal ideology brought about by the Civil Rights movement in the early 1960s as well as the resumption of immigration following the abolishment of the national origins quota system in 1965. Unlike in the late 19th century, this new influx of immigrants did not lead to jingoism in the 1960s and 1970s, perhaps because the number of foreign born people as a percentage of the total population remained low at 4.7% in 1970 compared to 19% in 1910 as discussed above. Rather, this wave of immigration promoted linguistic diversity in education and in political areas to meet the needs of those with limited English.

In education, bilingual and bicultural education was promoted by new legislations and court rulings. In 1968, the Bilingual Education Act, introduced by Texas Senator Ralph Yarborough the previous year, was signed by President Lyndon Johnson and made into federal law. The Bilingual Education Act was the first federal recognition that students with limited English speaking ability have special educational needs and that the needs of limited English speakers must be addressed in order to provide equal educational opportunities for all. As if to support this legislation, in 1974, when a group of Chinese schoolchildren sued the San Francisco school district in *Lau vs. Nichols*, the Supreme Court ruled that “the Civil Rights Act requires the school district to take affirmative steps to rectify ‘language deficiency of non-English speaking children.’”^{xiv} The Court also noted that failure to take affirmative steps takes away equal educational opportunities and thus violates equal protection under the law guaranteed by the Fourteenth Amendment of the U.S. Constitution. This decision had a large impact on promoting bilingual education.

In the political realm, a bilingual provision to the Voting Rights Act of 1965 was passed in 1975. It required “election ballots and other voter information to be printed in languages spoken either by 10,000 people or by 5 per cent of the population in a voting jurisdiction.”^{xv}

In short, during the 1960s and 1970s, the influx of new immigrants led to demands that the “government provide education, election ballots, emergency services and other information in languages other than English.”^{xvi} These demands were met through the

promotion of bilingualism by legislations as well as court decisions, especially in the areas of education and politics.

3.4 The resumption of unity and the push for official language: the 1980s to present

The increase in the use of other languages and the promotion of bilingualism and language tolerance triggered a backlash in the 1980s, and the conflict on the language issue continues to this day. This conflict is largely due to the increase of illegal immigrants, the population of which is estimated to be over 10 million today, and the support of President Ronald Reagan who is believed to be the most conservative President in the history of the United States.^{xvii} Turbak wrote in 1994 that according to various polls, “more than three-fourths of all Americans believe English should be the official language of government.”^{xviii}

For the first time in history, an organized movement to designate English as an official language has been activated on both the federal and state levels. This movement, termed English Only, is promoted largely by citizens’ action groups like U.S. English, Inc. U.S. English is the largest English Only organization in the United States with a membership of 1.8 million people. It was established in 1983 by former Senator S. I. Hayakawa with twin objectives to designate English as an official language and to reform bilingual education.

The English Only movement has actively promoted the designation of English as an official language on the federal and state levels. Most notably, on the federal level, formal discussions on the subject have commenced in Congress for the first time in history. Specifically, three laws have been submitted in an attempt to make English the official language. First, the English Language Amendment, the first legislation to make English official language was submitted in 1981 by California Senator S. I. Hayakawa and has been resubmitted every year since. Public hearings were held in the Committees in the Senate in 1984 and in the House of Representatives in 1988. However, no deliberation has taken place on the Congressional floor itself.

Second, in 1996, the English Language Empowerment Act, submitted by Representative Bill Emerson from Missouri, passed the House of Representatives by a vote of 259 to 169. The Act declares English the official language of the federal government and requires that only English be used in the federal government, with the exception of diplomacy, public health, public safety, and foreign language education. The Governmental Affairs Committee of the Senate chose not to deliberate and let the Act expire. However, more importantly, President Bill Clinton indicated he would exercise veto power, should the Act pass the Senate as well.

Third, in 2006, Oklahoma Senator James Inhofe submitted two Amendments to the Comprehensive Immigration Reform Act of 2006. The first amendment, to designate English as the “national language” to be used in government affairs, passed the Senate

by a vote of 63 to 34. The other amendment, to designate English as “the common and unifying language of the United States” with no restriction on use of language, also passed with a vote of 58 to 39. However, neither Amendment became a law, as the Comprehensive Immigration Reform Act itself did not pass Congress. This was the closest that English has come to being made into the official language by law. Nonetheless, various laws and amendments have been submitted to Congress every year in an effort to make English the official language.

On the state level, the English Only movement has had more success. As of April 2014, 31 states have designated English as the state’s official language by law. The content ranges from merely symbolic to restriction on languages other than English. In particular, Proposition 63 in California has given the state government the right to implement all possible measures toward making English the official language and gives residents the right to sue when faced with a situation that violates the use of English as an official language.

Against this backdrop, even bilingual education has lost its once strong support. On the federal level, the Bilingual Education Act was quietly let to expire in 2002. On the state level, Proposition 227 abolished bilingual education in California in 1998, banning the use of languages other than English for instruction in public schools, followed by the similar Proposition 203 in Arizona which imposed the English Only requirement for public schools.^{xix}

4. Swing of a Pendulum

As discussed in Section 3 above, the pendulum of national sentiments on the language has swung between tolerance of non-English languages on the one hand and insistence on English only on the other, reflecting political and social developments throughout history. Three factors play a particularly influential role in determining the direction and the distance of the pendulum’s swing. These are: the impact of immigration, the principles of the U.S. Constitution, and the development of certain national values. While the first factor is a tangible factor that has visible manifestations, the latter two are intangible factors that work in a subtle manner. It is of particular interest how these factors have converged in recent years in a manner that encourages language tolerance.

4.1 Immigration

A large influx of immigrants has generally led to “an increase in various strains of xenophobia and a crusade to ‘Americanize’ the new immigrants.”^{xx} This was the case in the late 19th to early 20th century when a large number of non-English speaking immigrants arrived from Southern and Eastern Europe. The increasing success of the English Only movement in recent years also shows how a large increase of an immigrant population can intensify intolerance on the use of language other than

English. During both periods, the pressure to require immigrants to assimilate and accept the American way, including English, increased markedly.

However, the national response in recent years appears more complex due to the formation of political critical mass by Hispanics, based on two reasons. One is a fundamental change in the racial composition that the United States has been and will be facing during the first half of the 21st century. While the white population is expected to decline from 69.1% of the total population in 2000 to 46.6% in 2050 and lose its majority position, the Hispanic population is expected to increase from 12.6% in 2000 to 27.9% in 2050. Another reason is the regional concentrations of the Hispanic population, as described in Section 2 above. Such concentration of the population endows the Hispanics with decisive voting power in certain regions which cannot be ignored by politicians. The critical mass already exists not only in local elections but also in the Presidential election, in which Hispanic votes can sway the outcome of key swing states such as Florida and Texas. This fact carries significant political leverage.

The need for politicians to court the Hispanic vote is likely to encourage use of languages other than English, namely Spanish, in political activities. As reported by *The Washington Post* on August 19, 2014, even the conservative Republicans are “increasingly eager to get the word out – en Español”^{xxi} and Republican politicians frequently make appearances on Spanish-language TV programs.

Thus, the impact of immigration can work in two different directions, one towards intolerance of multiple languages and pressures to assimilate, and another towards more inclusiveness through language diversity. While both forces are at work today and making progress, overall, however, the growing presence of Hispanics and their critical mass will continue to favor language diversity over the English only approach.

4.2 The U.S. Constitution

Consistency with the provisions of the U.S. Constitution has carried heavy weight throughout history. In general, the very fact that the Constitution remains silent on the issue of an official language can be interpreted as an expression of tolerance on the language. Specifically, in language policy, the two particularly relevant concepts are freedom of speech under the First Amendment and equal protection under the law under the Fourteenth Amendment.

In the past, courts have ruled in favor of language diversity on the federal and state levels. Even before its 1974 ruling on *Lau vs. Nichols* described above, the Supreme Court ruled in *Meyer vs. Nebraska* in 1923 that the state’s English Only law prohibiting foreign language education below the eighth grade violates the Constitution, as the Constitution protects the rights of “those who speak other languages as well as those born with English on the tongue”^{xxii} On the state level, Arizona State Supreme Court ruled in 1988 that the Arizona constitutional amendment that requires all state government employees to use only English during

working hours is unconstitutional, because it violates employees' free speech rights under the First Amendment.

Accordingly, adherence to the principles of the U.S. Constitution poses a significant hurdle for the designation of English as the official language, if it is to exclude use of other languages.

4.3 National values

National values change over time, usually following a historical event that works as a turning point. From the Declaration of Independence to Emancipation Proclamation to women's suffrage to the Civil Rights movement to same-sex marriages, the national values of the United States have progressed steadily towards greater equality and greater tolerance of racial and sexual differences.

Another factor that changes national values is the change of generations. As people born and raised in the post-Civil Rights movement era have come to form the backbone of the society, the more liberal values that respect diversity have become more prevalent in recent years.

However, it should be remembered that conservatism not only remains strong in certain segments of the society, but can also spread during times of economic difficulty or national crisis. One recent example is the nationalistic and conservative response to the 9/11 attack in 2001 that targeted Muslims in the United States. Unless diversity becomes recognized and firmly grounded as an integral part of the national identity by all segments of the society, the pressure to force Americanization will not disappear completely. Thus, language diversity cannot yet be securely considered part of the "new" U.S. identity, which can work to deter the movement to designate English as the single official language. Over history, however, national values have made a significant stride towards liberalism which accepts diversity in general and multiple languages in particular.

4.4 Summary

Table 2 shows how each of the three factors discussed in this section can impact both language tolerance and language intolerance. These factors are at work simultaneously, and it is their combined effect that determines the direction and distance of the swing of the pendulum of national sentiments. The general direction in recent years has been towards language tolerance based on the de facto multilingualism that exists in the US society, but opposition to such direction continues to be prominent.

Table 2: Factors that influence language tolerance and language intolerance

	Language tolerance	Language intolerance
Increase of immigrants	Political leverage Needs to cater to immigrants	Xenophobia Pressures for assimilation
Constitution	Freedom of speech Equal protection under law	
National values	Liberalism Civil rights	Conservatism Nationalism

5. Conclusion: Future Prospects

Two questions about the future are presented. First, can the U.S. continue its language policy of not having an explicit language policy? Second, if the answer to the first question is a no, then will English be designated the official language?

It should be noted that the current debate on designating English as the official language symbolizes the bipolar divide of the United States which has widened in recent years. This divide separates the conservatives from the liberals, the rich from the poor, and the traditional white Americans from the new immigrants. As such, the conflict reaches beyond a mere language issue. Rather, it encompasses a wide range of issues such as immigration policy, social welfare, and income distribution on the one hand, and a wide variety of stakeholders, on the other. Therefore, it is difficult for this issue to reach a simple conclusion.

Two recent developments could have a direct impact on the direction of the language policy issue. One is the government’s review of its immigration policy, partly triggered by the large increase in the number of illegal immigrants. Illegal immigrants in effect create a sub-class below legal immigrants as a target for exclusion. If the illegal immigrant population, estimated to exceed 10 million people,^{xxiii} is legalized and given votes, the illegal immigrants living in the United States could gain significant political leverage which could influence language policy as well.

Another critical development is the outcome of Puerto Rico’s potential application for statehood in the United States. After holding a national referendum on statehood on four occasions, with approval increasing each time, the application was approved in November 2012 in Puerto Rico. There still remain hurdles that will need to be cleared, such as approval by the legislature, but it appears likely that Puerto Rico will apply for statehood in the near future. Puerto Rico represents a sphere of Hispanic culture and the Spanish language. If it becomes a state, Puerto Rico will become the 27th highly populated state. With a population of 4 million people, it would send four representatives to the House of Representatives. Whether to let Puerto Rico retain Spanish as its official language or force the use of English may present the first real test of the status of English beyond de facto official language.

Changes in the country’s demographic composition and a shift in the political balance can not only reinforce language tolerance and preclude designation of English

as an official language but also jeopardize even the status of English as the common language of the United States. In some communities with a heavy concentration of non-English speakers, such as Miami, Florida, utility of English has already declined significantly as Spanish has become the primary language.^{xxiv} Despite efforts made by the English Only movement, the inflow and growth of languages other than English appear unstoppable. Outcomes of the two pending issues of illegal immigrants and Puerto Rican statehood may work to further strengthen this trend. Whether the trend can be changed with the introduction of English as the official language remains unknown, as such designation itself appears difficult. In any case, demographic, political, and social changes will likely reduce the government's option to keep its policy on language implicit and flexible.

Endnotes

- ⁱ Spolsky, Bernard. (2011). "Does the United States Need a Language Policy?" *CAL digest* March 2011, p. 1.
- ⁱⁱ Ibid.
- ⁱⁱⁱ U.S. English, Inc. homepage
- ^{iv} U.S. Census Bureau. (August 2013). "Language Use in the United States: 2011". The data in Section 2 are taken from this document unless otherwise noted.
- ^v Crawford, James. (2008). "Frequently Asked Questions about Official English". p. 3. Retrieved from www.elladvocates.org
- ^{vi} For example, in 1789, Noah Webster wrote in his *Dissertations on the English language*, "As an independent nation, our honor requires us to have a system of our own, in language as well as government." Thomas Jefferson, too, declared in 1812, "An American dialect will therefore be formed."
- ^{vii} Tiersma, Peter M. "Language Policy in the United States". *Loyola Law School Legal Studies Paper* No 2010-52 for Oxford Handbook on Language and Law (forthcoming), Tiersma, Peter M. and Lawrence M. Solan,(eds.) p.6. Retrieved from <http://ssrn.com/abstract=1710224>.
- ^{viii} Spolsky, Ibid. p. 1.
- ^{ix} Knutson, Cody L. (1996). "National Language Policy in the United States: A Holistic Perspective". *Nebraska Anthropologist*. Paper 96. p.8.
- ^x Lawton, Rachele. (2008). "Language policy and ideology in the United States: A critical analysis of 'English Only' discourse." *Papers for the Lancaster University Postgraduate Conference in Linguistics & Language Teaching, Vol. 2, p. 2.*
- ^{xi} Spolsky, Ibid. p.2.
- ^{xii} Ibid. p. 1.
- ^{xiii} Schmidt, Carol. "The Politics of English Only in the United States: Historical, Social, and Legal Aspects", p. 62. Retrieved from www.ncte.org/library/nctefiles/resources/Books/Sale/26677Cha03.pdf
- ^{xiv} Tiersma, Ibid. p. 18.
- ^{xv} Turbak, Gary. (1994). "The Campaign Against English" *The Social Contract*, Volume 4, number 3
- ^{xvi} Schmidt, Ibid. p. 69.
- ^{xvii} President Reagan said, "my support of declaring English language to be the official language of the Federal Government is based on two simple principles: unity and opportunity."
- ^{xviii} Turbak, Ibid.,
- ^{xix} Lawton, Ibid. p. 84.

^{xx} Schmidt, *Ibid.* p. 62.

^{xxi} O’Keefe, Ed. (August 19, 2014) “Republicans increasingly eager to get the word out – en Española,” *The Washington Post*. Retrieved from www.washingtonpost.com/politics

^{xxii} Crawford, *Ibid.* p. 9.

^{xxiii} Nishiyama, Takayuki. “Direction of reform of the Immigration Act in the United States.” *NHK*. Retrieved from <http://www.nhk.or.jp/kaisetsu-blog/400/164824.html> (original in Japanese).

^{xxiv} “In Miami, Spanish becoming primary language.” (May 29 2008). *Associated Press*. Retrieved from <http://www.nbcnews.com/id/24871558/>