On Case-Checking & NPI Licensing in Hiberno-English

Nigel Duffield

In this paper, I discuss the status of an apparently idiosyncratic feature of varieties of Hiberno-English, in which a restricted set of negative polarity items are licensed in the subject position of finite clauses. It is argued that this property is derivable from a deeper syntactic property that distinguishes these dialects from Standard English. It is further claimed that the mechanism which licenses NPIs in these dialects is quite general, extending to unrelated instances of NPI licensing in other languages, including Standard French and Modern Irish. At a theoretical level, the paper provides conceptual motivation for the idea that negative polarity licensing takes place at the level of Logical Form, rather than s-structure, once this level is properly articulated, and sheds some light on the relationship between Case and Quantifier Scope.*

0. Introduction.

From a theoretical point of view, the conditions on the licensing of negative polarity items (NPIs) are rather puzzling; empirically, they are the source of a good deal of controversy. The primary linguistic datum which motivates these conditions is the well-known ban on NPIs in the subject position of finite matrix clauses in English, illustrated in (1):

(1) a. Brendan couldn't believe it. *Anyone hadn't seen John
b. Brendan didn't believe that anyone had seen John
c. *anything could(n't) be done
d. there wasn't anything (there) that anyone could see (anyone = no-one)
e. *there wasn't anything (there), as anyone could see (anyone ≠ no-one)
f. Patrick would give nothing to anyone
g. *Patrick would give anything to no-one

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In the generative literature, the standard explanation of these cases is that NPIs are universally subject to a licensing condition, requiring strict c-command of the NPI by a negative operator (NEG) at s-structure (*cf.* Baker 1970, Linebarger 1987, Progovac 1988, 1991, Laka 1990, amongst others). Given that the subject position is generally not c-commanded by NEG in English matrix clauses, the ungrammaticality of (1a,c,e,g) follows immediately:

(2) NEG ^c NPI at s-structure (where ^c = obligatorily c-commands)

For convenience, I will abbreviate this condition on s-structure c-command to the CSS. This will be contrasted presently with the CLF, to be understood as the proposal that NPI-licensing takes place at the level of Logical Form (LF). The CSS, which is formally a very straightforward condition, is conceptually mysterious, mostly because of the peculiar status of NEG itself, and of the binding relationship holding between NEG and the NPI it licenses. (It is also interesting because of certain new problems raised within the Minimalist Approach to syntactic representation (Chomsky 1992), in which s-structure is dispensed with as a distinct level of representation. For now, I will leave this second issue to one side, and consider more closely what is anomalous about NPI-licensing).

1. Negative Polarity and Quantifier Scope.

The central theoretical problem raised by NPI licensing can be rather simply, if roughly, stated as follows. On the one hand, it is clear that NPI licensing relationships display many parallels with certain kinds of A'-relations, in particular with interactions between Quantifier Phrases (QPs), as well as with other operator-variable relationships, including WH-movement. It is well-known that in certain contexts QPs may interact with and block NPI dependencies. The existence of such Minimality effects as those illustrated in (3) constitutes strong *prima facie* evidence that NPI and Quantifier Scope Relations create the same kind of A'-dependencies:

(3) a. Brendan didn't believe that John had seen anything
b. Brendan didn't give John anything
c. *Brendan didn't believe that everyone had seen anything
d. *Brendan didn't give everyone anything

On the other hand, NPI-relations contrast with other A'-dependencies in certain crucial respects, notably in their violation of the Bijection

Principle (Koopman & Sportiche 1982),[1] and in their apparent insensitivity to traces of movement. Moreover, it is generally agreed that scope and operator-variable relationships are checked, and in many cases only established, at LF (*cf.* Huang 1982, May 1985, Aoun & Hornstein 1985), whilst the CSS claims that NPI licensing must be checked at s-structure. Broadly speaking, it is this LF vs. s-structure contrast which is used to explain why sentences involving multiple QPs display the range of ambiguities that they do, and why NPI contexts typically fail to show these ambiguities.

1.1. *Scope & A'-Binding (Aoun & Li 1989).*

In order to explicate these contrasts, it is necessary to briefly outline a theory of QP scope interactions. For this purpose, I will adopt the restrictive treatment of scope relations proposed in Aoun & Li (1989), in which QP scope effects, derived by Quantifier Raising at LF (QR), are universally constrained by two quite general principles, the Minimal Binding Requirement (MBR) and the Scope Principle (SP), reproduced below (from Aoun & Li 1989:141):[2]

(4) a. The Minimal Binding Requirement:
Variables must be bound by the most local potential A'-binder.
b. The Scope Principle:
A quantifier A has scope over a quantifier B in case A c-commands a member of the chain containing B.

The principal facts accounted for through the interaction of these two principles are contrasts in scope possibilities between English and Chinese matrix clauses involving multiple QPs, as well as the absence of structural ambiguities in English double-object constructions (*cf.* Barss & Lasnik 1986, Larson 1988). In the sentences (5-6) below, only the

[1] WH-variable chains – and QP scope interactions (see below) – generally respect the Bijection Principle (Koopman & Sportiche 1982), forbidding one licensor to license (A'-bind) two variables; NEG, by contrast, appears to be able to license any number of NPIs within its domain:
(i) a. *who(m) did Brian tell x_i that Mary was attracted to x_i
b. *cf.* who(m) could Brian tell that Mary was attracted to x_i
(ii) a. Richard wouldn't give anyone anything
b. nothing that *anyone* has ever said has *ever* had *any influence* on *any politician*
c. personne n'a *jamais rien* dit.
(see note below for some speculations on this)

[2] Aoun & Li developed these principles in order to resolve certain empirical shortcomings with a previous constraint on QP interactions, Huang's (1982) *Isomorphic Principle* (IP), which proposed that in the absence of language-particular restructuring rules, LF c-command relations between quantifiers were isomorphic with s-structure c-command relations. The fact that violations of the IP are *construction*-, rather than *language*-specific – evidenced by the ambiguity of Chinese *passive* sentences, and the lack of ambiguity in English double-object constructions – renders unsatisfactory a solution based on the kind of restructuring rules, proposed by Huang (see Aoun & Li 1989, 1993 for further details). Nevertheless, the two approaches share the assumption, also adopted here, that LF is not a possible locus of parametric variation; hence, that apparent logical contrasts should be traceable to local syntactic conditions (*cf.* Higginbotham 1985).

English active sentence in (5a) is ambiguous; in the other cases, it is impossible to assign a wide-scope reading to the 'structurally lower' QP:
(From Aoun & Li 1989)

(5) a. someone loves everyone (2)
b. John assigned someone every problem (5)

(6) a. meigeren dou xihuan yige nuren. (1a)
everyone all like one woman
'everyone loves a woman'
b. yaoshi liangge ren zhaodao meige xiansuo ... (1b)
if two men found every clue
'if two men found every clue'

Assuming free application of QR, the constraining effect of the Minimal Binding Requirement is to rule out LF representations, either nested or crossing configurations, where variables created by QR are not *immediately* bound by the operator with which they are co-indexed (see Aoun & Li for details). In the case of the sentences (5-6), the MBR ensures that the structurally lower QP *every problem* in (5b) cannot raise at LF to take scope over the indirect object *someone*, and that in the Chinese examples in (6), the QP subject must have wide scope over the object:[3]

(7) a. LF: $[_{VP1}$ someone$_i$ $[_{VP1}$ assigned $[_{SC}$ x_i $[_{VP2}$ every book$_j$ $[_{VP2}$ e x_j]]]]]
b. *LF: $[_{VP1}$ someone$_i$ $[_{VP1}$ every book$_j$ $[_{VP1}$ assigned $[_{SC}$ x_i $[_{VP2}$ e x_j]]]]]

(8) a. LF: $[_{IP}$ meigeren$_i$ dou $[_{IP}$ x_i $[_{VP}$ yige nuren$_j$ $[_{VP}$ xihuan x_j]]]]
b. *LF: $[_{IP}$ meigeren$_i$ dou $[_{IP}$ yige nuren$_j$ $[_{IP}$ x_i xihuan x_j]]]]

However, if it were not for the ambiguity of English sentences such as (5a) - and herein of course lies the interest - one could just as easily read off the possible interpretations of these sentences from their *s-structures*. Up to this point, the simple s-structure account of NPI-licensing given in (3) would serve equally well for the determination of QP scope relations. Hence, if there were a full parallelism between QP scope interactions and NPI licensing, then we should expect *either* that NPI sentences such as (1a,c) should be grammatical for whatever reason (5a) is ambiguous (assuming the LFC) *or* that (5a) should be as unambiguous as its Chinese counterpart, assuming s-structure parallelism (the CSS). It is the ambiguity of (5a), and its contrast with the Chinese examples in (6), that provides the evidence for the necessity of the more sophisticated LF account, as well as being a major point of divergence between QP scope effects and NPI licensing.

[3] The analysis of English double-object constructions reproduced here, which combines insights of previous analyses (Kayne 1984, Larson 1988), is elaborated in Aoun & Li (1989).

Aoun & Li (1989, 1993) derive the interpretive contrast between (5a) and (6) from a quite simple phrase-structural difference between English and Chinese: the presence of an NP-trace in the [Spec,VP] - the internal subject position - in English matrix clauses. Adopting the proposals of Koopman & Sportiche (1988) and Kuroda (1985) amongst others, the authors assume that English SVO word order is derived by subject-raising to [Spec,IP]. Chinese does not allow this type of subject-raising; hence there is no VP-internal subject trace. The scope ambiguity in (5a) obtains when the object NP *everyone* raises at LF, adjoining to VP. From this position, it c-commands and takes scope over a member of the QP subject-chain (thus satisfying the Scope Principle); the MBR is not violated, however, since the c-commanded element is a *trace*, not a *variable*.[4] Since Chinese [Spec,VP] does not contain an NP-trace, the MBR will continue to prevent such ambiguities in Chinese. The LF representation of (5a) is then be as in (9):[5]

(9) LF: $[_{IP}$ someone$_i$ $[_{IP}$ x_i $[_{VP}$ everyone$_j$ $[_{VP}$ t_i loves x_j]]]]

It seems then, in light of the strong ungrammaticality of (1a,c), that one important difference, perhaps *the* important difference, between the determination of Quantifier Scope and the conditions on NPI licensing can be traced directly to the relevance, or 'visibility' of NP-trace. This would appear to be confirmed by the sentences in (10), where the presence of an NP-trace within the scope of NEG fails to yield well-formedness:

(10) a. *[anyone$_i$ doesn't $[_{VP}$ t_i love John]]]
b. *anything$_i$ doesn't $[_{VP}$ (t_i) seem $[_{IP}$ t_i to affect Cathy]]
c. *anything$_i$ $[_{VP}$ (t_i) seems $[_{IP}$ (t_i) not to [(t_i) affect Cathy]]]
d. *any horses$_i$ weren't $[_{VP}$ (t_i) stolen t_i]

[4] Interestingly, whilst determination of QP scope is sensitive to the presence of NP-traces, it seems not to be sensitive to the presence of PRO. Hence, there is a minimal contrast in scope possibilities in (1) below:
(i) a. someone$_i$ seems $[_{IP}$ t_i to like everyone in the department] (ambiguous)
b. two students$_i$ seemed $[_{IP}$ t_i to like every secretary in the department]
c. someone$_i$ tried $[_{IP}$ PRO$_i$ to like everyone in the department]] (unambiguous)
d. two students$_i$ had the good sense $_{CP}[_{IP}$ PRO$_i$ to admire every secretary in the department]]

[5] See Aoun & Li (1989, 1993) for details. As the authors point out, it makes no difference to this analysis, whether one assumes that in Chinese, subjects remain VP-internal, or whether they are base-generated in [Spec,IP].

1.2. *Generalizing the Scope Principle: the Case Condition.*

An alternative way of viewing this is in terms of Case Theory: one might hypothesise the conditions on NPI licensing and Quantifier Scope to be identical, *except* that only Case-marked elements count in the determination of NPI-licensing, whereas Case is irrelevant to QP scope interactions. Let us term this hypothesis the Case Condition, given below as a first approximation:

(11) Case Condition:
For a Negative Polarity Item to be properly licensed, at least one Case-marked member of the NPI-chain must be c-commanded by a Negative Operator.

Conceptually, this view of things is virtually parallel to the traditional analysis of the difference between QP-scope and NPI-licensing which is cashed out in terms of an CSS vs. LFC contrast. This is because within recent GB theory, *i.e.* up to Chomsky (1992), the principal motivation for a level of syntactic structure derivationally prior to the LF/PF interfaces was as a means of representing Case relations. Empirically, however, there is one interesting difference between the Case Condition and the CSS constraint in (3): in principle, this new condition allows for NP-traces to count for NPI-licensing just in case they could somehow be Case-marked. Of course, this state-of-affairs cannot generally obtain, since NP-traces are normally only created as a direct consequence of the 'caselessness' of their syntactic position. Nevertheless, in the next section, some data will be presented which appear to exemplify just this special case, and which provide empirical support for this reformulation of the conditions on NPI-licensing. If the proposed analysis of these structures proves to be on the right track, this will be a fortunate result, since we shall have gone some way towards unifying the conditions on syntactic scope, whilst at the same time relating the contrasts which do exist to a fairly well-understood component of the grammar, namely the Case module.[6]

Before considering these data, it is necessary to advert to one set of apparent counter-examples to the Case Condition in Standard English, which the observant reader will have noticed immediately. The Case Condition appears to incorrectly predict the grammaticality of NPIs in object topicalisation structures, where, under standard assumptions, the empty category in complement position is both case-marked (by V) and c-commanded by NEG:

[6] Within the Minimalist approach (Chomsky 1992), this would also seem to be a desirable result, since it points towards a way of dispensing with s-structure as a distinct level of formal representation, whilst maintaining the contrast which the s-structure/LF instantiates.

(12) a. *anyone$_i$, Cathy can't stand t_i
b. *anything$_i$, John gave nobody t_i

I propose to ignore these cases for the moment. The justification for this is twofold, having to do with the status of topicalised quantifiers generally. Notice, first of all, that topicalisation of the negative quantifier *no-one* yields equally bad results:

(13) a. *no-one$_i$, Cathy can visit t_i
b. *nothing$_i$, John gave Eileen t_i

There seems, then, to be a wider restriction on topicalising this type of quantified expression. Notice, further, to the extent that it is possible to topicalise QPs such as *everyone*, *someone etc.*, that these sentences are unambiguous, with obligatory wide-scope of the topicalised QP, in direct contrast to their untransformed counterparts:

(14) a. everyone$_i$, someone can't stand t_i (*wide-scope to *someone*)
b. someone$_i$, everyone can't stand t_i (*wide-scope to *everyone*)

Given these observations, combined with our present goal of providing a unified treatment of NPI-licensing and Quantifier Scope, it seems justified to temporarily ignore the offending data in (12); ultimately, we will propose to explain out the ungrammaticality of (12) by the same principle which blocks the ambiguity of (14), namely the Minimal Binding Requirement (4a). For the moment, we may simply stipulate that the Case Condition refers to Case-marked *traces*, but not to *variables*; this device will achieve, albeit somewhat mechanically, the result required in order to proceed.[7]

2. *NPI Licensing and the Case Condition.*

2.1 *Hiberno-English.*

Keeping the previous discussion in mind, consider now the sentences in (15) below. These are actual utterances taken from a corpus of Hiberno-English speech, collected and made available by Markku

[7] As pointed out to me by Joseph Aoun (p.c.), the Japanese equivalents of the English sentences in (14) are in fact ambiguous in that language. This is entirely expected on the account developed here, *if* Japanese scrambling involves A-movement, rather than A'-movement. See also the discussion of Celtic Topicalisation in the final section of this paper. In addition, the fact that such sentences are ambiguous in Japanese leads to the (correct) prediction that Japanese NPIs will remain properly licensed even when they are scrambled to a structural position higher than NEG. See Duffield (1993) for a discussion of the Japanese *sika-nai* construction.

Filppula (see Filppula 1986, 1991).[8] Many, though significantly not all, of the sentences presented in this section are from those dialects of Hiberno-English termed Anglo-Irish by Henry (1977):[9]

(15) a. but from that day out, anyone that was on the meitheal, or anyone in the parish never said a bit t' him, or never done..made a move to have sport on him or anything like that...(cla-mv)
b. aha. Although anybody don' seem to like to live in Russia...They're all trying to get out of it...(ker-mc)
c. you couldn't pick a daisy but it was a sin. Now, anything is no sin... (bel3-mc)
d. you know, any fellow wouldn't bother joining if he wasn't interested enough to try...(bel2-js)
e. any country couldn't stand it..why don't they spread through the country and ask work like I did...(bel3-mc)

The existence of these *prima facie* violations of the CSS was first brought to general attention in Harris (1984); to my knowledge, they have not been given any formal syntactic treatment up to now. Harris does not himself provide any detailed analysis of these structures. He proposes instead that this feature is the direct result of L_1 interference from Irish, rather than representing a real grammatical option for these speakers. If this were correct, then it might seem more reasonable to treat these subject-NPIs as some kind of lexically-specified idiosyncratic property of the dialects in question than to develop an elaborate syntactic analysis.

However, there is reason to suppose that the sentences in (15) do represent a grammatical option (even though Irish is almost certainly the original source of the construction; see below). The main empirical justification for favouring a syntactic option is that two of the four speakers whose utterances these are are neither native speakers of Irish, nor live in areas where Irish is still widely spoken: three of the recorded utterances in (15) are from speakers of Belfast English; of the other two

[8] I am very grateful to Markku Filppula for making these data available to me. The codings following the utterances identify the area where the recording was made, and the speakers involved: CLA = Co. Clare, KER = Co. Kerry, WIC = Co. Wicklow, DUB = Dublin, BEL1= Belfast/children, BEL2 = Belfast/middle-aged, BEL3 = Belfast/elderly. For a brief biographical history of these speakers, see Filppula (1986).

[9] In his discussion of varieties of English spoken in Ireland, Henry (1977) identifies three major strands: (i) "an urban, regional and standard variety tending towards Standard English", termed Hiberno-English; (ii) Ulster-Scots, spoken in the North-Eastern counties of Ulster; (iii) "a rural variety compounded of Irish and English or Irish and Scots developed chiefly in the last century and a half", termed Anglo-Irish. These distinctions refer to *influences* on dialects, rather than dialects themselves; as Henry makes clear, each dialect represents an admixture of these various influences. Hence, it would be more correct to speak of "strongly Anglo-Irish influenced dialects" than of Anglo-Irish dialects *per se*. Even with this caveat, the status of these distinctions remains controversial among dialectologists.

speakers, only one is functionally bi-lingual (for details of coding, see note 9).[10]

Let us assume that these structures do in fact instantiate a grammatical option: in Hiberno-English (HE), NPIs are properly licensed in the subject position of finite clauses, an apparently clear violation of the CSS in (3). The immediate challenge, then, is to find a syntactic account of this HE vs. Standard English (SE) contrast which, if possible, derives the well-formedness of (15) from other observable – and hence learnable – structural differences between the two varieties, whilst at the same time preserving a common phrase-structure analysis for all English varieties. This latter criterion is important, since, with the exception of this and a very few other constructions, Standard English and Hiberno-English otherwise display an identical range of structural and logical effects. It will be proposed in a moment that the Case Condition in (11) meets this challenge rather well.

Before presenting this analysis, and examining some cross-linguistic consequences of adopting the Case Condition, it is necessary to consider an interesting alternative to rejecting the CSS. For, although a number of authors have previously drawn attention to apparent counter-examples to the CSS (Ladusaw 1979, Linebarger 1987, Progovac 1988, 1991, Laka 1990), it is often the case that closer consideration of these examples has resulted not in a rejection or parametrisation of the CSS, but rather in the retention of the constraint under a more sophisticated analysis of the offending structures.

2.2. *Retaining the CSS: Laka (1990).*

Basically, the alternative strategy adopted is to show that the CSS in fact still holds, once the structure in question is properly analysed. The claim is that sentences similar to (15) are not really counter-examples at all, but that they appear to be for one of two reasons: either, (i) the licensor (NEG) has been falsely identified; or (ii) the position occupied by the NPI, which would be unlicensed *in another language*, is correctly licensed, *i.e.* c-commanded by NEG, in the language in question. This second part of the strategy typically involves a parameterisation of functional projections (NegP, TP), such that the subject position is c-commanded by NEG.

Both parts of this general strategy are pursued to considerable effect in Laka (1990). With respect to (i) above, Laka demonstrates that apparent counter-examples to the CSS involving 'inherently negative' predicates in English, such as *deny, unlikely, etc.*, illustrated in (16b,d)

[10] Moreover, even if it were the case that all of these utterances came from Irish-English bi-linguals, one would still require an explanation as to why this feature is transferable, when other lexico-syntactic properties: *e.g.* word order, use of resumptive pronouns, *etc.*, seems not to be.

can be accounted for by assuming that the licensor is not the predicate itself, but rather the (negative) complementiser:[11]

(16) a. the witnesses denied that anyone left the room before dinner
b. [that anyone left the room before dinner] was denied by the witnesses (Laka 1990:198)
c. it seemed unlikely that anyone would believe this
d. [that anyone would believe this] was unlikely

More relevant to the present discussion is Laka's treatment of NPIs in subject position in Basque, which exemplifies the second part of the strategy to preserve the CSS. (In fact, Laka's main purpose is to motivate a particular clausal structure for Basque; negative polarity licensing effects are treated as a diagnostic and verification, rather than as an explicandum, of the proposed analysis; however, for present purposes the motivation for her analysis is irrelevant.) The facts seem rather clear: in Basque, NPIs are properly licensed in subject position (examples from Laka 1990:36-37):

(17) a. ez dio inork Iboni etxea eman (27a)
no has anybody Ibon-to house-the given
'nobody has given the house to Ibon' (Lit. Anybody hasn't given the house to Ibon)
b. ez da inor etorri (27b)
neg has anybody come
'nobody came' (lit. Anybody didn't come)
c. *inor etorri da (28)
anyone come has
'nobody has come'

The ungrammaticality of example (3c) demonstrates that *inor(k)* is a true NPI, rather than a negative quantifier. Laka accounts both for the grammaticality of (17a,b) as well as for the contrast with Standard English in terms of a (parametric) re-ordering of functional projections in the two languages. She proposes that in Basque NegP dominates TP, whilst in English, the opposite hierarchical ordering obtains:

[11] Actually, it is not clear that Laka's proposal is adequate. If it were the negative complementiser which licenses the NPI within the sentential subject NP in (16b,d), one would predict that non-extraposed *gerund* (both POSS- and ACC-ing) constructions, which involve no overt complementiser – negative or otherwise – should be ungrammatical. Yet this prediction seems to be false: (i) below appears to be appreciably better than (ii), for the speakers consulted:

(i) (?) our/Us understanding anything of this opera is extremely unlikely
(ii) *our/Us understanding anything of this opera is extremely likely

Unfortunately, the Case Condition, at least as formulated in (11) does not seem to fare any better with these sentences on a first pass. See Duffield (1993) for further discussion.

(18) a. IP^cNegP^cVP (English)
b. NegP^cIP^cVP (Basque)

In this analysis, Inflection (IP) is not fractionated into its functional components, along the lines of Pollock (1989), Chomsky (1989), amongst others. As a result, Agr(eement) categories are not independently represented; IP is equated with TP in her account. For Laka's purposes, the decomposition of INFL in this way is probably irrelevant; it is only important that NegP should dominate IP/TP in Basque. This is sufficient to derive the word-order and the NPI licensing facts. When we turn directly below to consider Hiberno-English, however, it will be crucial that INFL be fractionated into (at least) TP and AgrP, and that in English AgrP should dominate TP, as proposed in Chomsky (1989).

In addition to this parametric re-ordering, Laka proposes that the observed surface word-order, in which the auxiliary element bearing Tense features appears in a position structurally higher than the subject (in [Spec, IP]), is the result of head-movement from I^0-to-Neg^0. This head-movement operation, she claims, is motivated in its turn by another, putatively universal, c-command constraint, the Tense c-command Condition. This is reproduced in (19) below, since it turns out to be relevant to the discussion in the next section: it will be suggested that this formulation may be incorrect, insofar as it refers to Tense, rather than Negation:

(19) Tense c-command Condition (Laka 1990:9)
Tense must c-command at s-structure all propositional operators of the clause [including negation: NGD]

Laka provides some supporting evidence for the re-ordering of functional projections in Basque that she proposes. First, there are the surface word-order facts themselves; the simplest analysis of the distribution of negation elements in Basque clauses with respect to verbal elements, including auxiliaries, would place them outside IP. In addition, Laka points out that her analysis correctly predicts that it should be possible to delete IP in Basque without deleting NegP, something which is impossible in English:

(20) a. *Mary bought a book and Peter not (22)
b. Mary bought a book and Mary didn't (23a)
c. Marik liburua erosi du eta Peruk ez (25)
Mary book-the bought has and Peter no

Laka's account, then, provides a means of licensing NPIs in subject position, whilst retaining the CSS. So, before abandoning this condition on the basis of the sentences in (15), it is reasonable to enquire whether

this account, in which the CSS is reprieved, could be translated to deal with the offending Hiberno-English data.

It seems that the answer is negative. All of the independent empirical motivation for a projection re-ordering account is absent; HE behaves virtually identically to Standard English with respect both to negation placement (in all types of construction) as well as to IP-*without*-NegP deletion:

(21) a. *John not did come
b. *not has John come
c. *John has come not
d. *John not came
e. *John came and Mary not

In the absence of this supporting evidence, it would seem unwarranted to propose a different ordering of functional projections in these varieties of English, with the sole aim and effect of preserving the CSS. Such a move would raise serious, arguably unanswerable questions of learnability, and it seems implausible that negative polarity sentences could constitute the crucial and sole trigger for this type of parametric variation.

However, if we reject an account along the lines Laka proposes, then it seems that the sentences in (15) force a rejection of the CSS, still assuming that these data represent a true grammatical option. At this point, there are basically two ways to proceed: either one can assume that the CSS holds in all other dialects and languages, and simply stipulate that these rather parochial data are lexically-specified idiosyncrasies. Alternatively, one can develop an analysis of NPI-licensing which subsumes and predicts the HE data, whilst still being restrictive enough to rule out the other cases dealt with by the CSS. Given the conceptual problems raised by the CSS discussed in the introduction, combined with the goal of unifying conditions on scope, and in light of the independent evidence for the Case Condition presented immediately below, I would suggest that this second route may be more profitable and interesting.

2.3 *Implementing the Case Condition.*

Let us see now how the Case Condition in (11), repeated here as (22), can account for the grammaticality of the sentences in (15).

(22) Case Condition:
For a Negative Polarity Item to be properly licensed, at least one Case-marked member of the NPI-chain must be c-commanded by a Negative Operator.

Consider the structure in (23), as an analysis of sentence (15e) above. This analysis is quite provisional, for expository purposes. In this structure, IP is split into its component elements; following Chomsky (1989), I assume that in English, AgrP dominates TP. (For the moment, I deviate somewhat from standard proposals, and assume that TP^cNegP in English, rather than *vice versa*; and that Neg elements – or possibly A(ssertion)P elements more generally (*cf.* Pollock 1989, Laka 1990) – raise with the auxiliary to AgrP).

(23) HE: $[_{AgrP}$ any country$_i$ $[_{Agrs}$ couldn't] $[_{TP}$ *t$_i$* $[_{To}$ t$_j$] $[_{NegP}$ t$_j$] $[_{vP}$ t$_i$ [v' stand it]]]]]

Adopting the same device used by Aoun & Li (1989, 1993) to account for English QP scope ambiguities in (5) above, I will trade on the presence of an NP-trace c-commanded by NEG to explain the grammaticality of this sentence. Specifically, I would propose that the Case Condition in (22) is satisfied by the presence of a case-marked trace in [Spec,TP] (the trace italicised in (23)). In this way, the contrast in NPI licensing between HE and Standard English reduces to one simple difference in case-marking possibilities; in Hiberno-English, the [Spec,TP] is a possible Case position.

Now, this analysis would be no less stipulative and *ad hoc* than the proposal that these cases are lexically-specified idiosyncrasies, if it were not for the fact that there is rather good independent evidence that [Spec,TP] is indeed a Case position in these varieties of English. The evidence comes from two separate sources; from infinitival clauses in Southern Hiberno-English and in Anglo-Irish (see note 10); and from the phenomenon of 'singular concord' found in varieties of Belfast English.

2.3.1. *Lexical subjects in infinitival clauses.*

In the linguistic literature on Hiberno-English, as well as in Irish English literature, the availability of lexical subjects in non-finite clauses is reasonably well-documented (*cf.* Henry 1957, 1977, Duffield 1989). The sentences in (24) are taken from contemporary corpora and from literary texts (see note 10):

(24) a. ...surely not knowing the way, they just give him a slap, or something like that and he, oh he to be afraid of the life of them but they are not afraid today (dub-l)
b. ...well, of course the man that brought it with the tractor.. you see, he to get his own share of it...(ker-mc)
c. and you'd to be a good thing, he to get a wife like that to run the house with him like that..(cla-jn).
d. oh, it was a cruel deal to look at it, like, and he had no ins' = he wasn't a tradesman at all, only he to be handy (cla-ob1)
e. t'is an aise to the gate, they to be married (Henry 1957)
f. t'was a loss to the country, Michael to die (Henry 1977)
g. d'you know anything – you to bid that little? (Henry 1957)
h. it is a pity, he not to awaken at this time. (Yeats)
i. 'typical,' said Morrissey, as she walked away, 'a female like that to spoil a funeral.' (Trevor 1969:256)

Whenever this phenomenon is discussed, the grammaticality of these structures is generally attributed, either directly or indirectly, to the influence of Modern Irish, which also permits lexical subjects in non-finite contexts, as illustrated in (25) (from Henry 1957):[12]

(25) a. is mór an suaimhneas don gheata [s iad a bheith pósta]
is great the ease to-the gate [s them-ACC to be-VN married]
't'is an aise to the gate they to be married'

Although, once more, Irish may have been the ultimate source and reinforcement for these constructions, it is doubtful that this feature is the direct result of L_1 transfer, since many of the attested examples are found outside the Gaeltacht, (*i.e.* the areas where Irish is still spoken as a native language.) Moreover, this feature is also found in Early Modern English, as the examples in (26) show.[13]

(From Visser 1963: 956 *ff.*)
(26) a. I to make me blith or glad.....[th]at nu mai be (13xx)
b. a king to kepe his lygis in justice, Without doute that is his offise (1385)
c. men to seye to women wel, it is best, And nor for to despise hem ne depraue. (1402)
d. a preest forto freli take and chose of alle maidens to hem a wijf... was allowed of Poul. (1449)
e. thou to love that loueth not the, is but grete foly (1470)
f. she to dy so dangerously... that was the thing that greued me so (1570)

[12] For an analysis of Irish non-finite constructions, see McCloskey & Sells (1988), Duffield (1991b, forthcoming).
[13] See Duffield (1989), Filppula (1991) for a discussion of these facts, which for some reason seem to have been overlooked in most generative treatments of English diachronic syntax.

g. of him I gathered honour, – which he to seek of me again, perforce –
Behoves me keep at utterance (1611)

In addition, there is one noteworthy difference between the Irish example and its Hiberno-English counterpart (24e): in the Irish cases, the lexical subjects obligatorily receive accusative, not nominative case; if this were a case of direct transfer, one would expect that this case-marking would also be transferred; particularly given the fact that in Modern (Standard) English, accusative subjects in non-finite clauses are reasonably acceptable:

(27) a. (?)them to go off like that?! It's astonishing!
b. (?)I couldn't believe it – her to be mistaken for a movie-star!

2.3.2. Singular concord in Belfast English.

Further evidence in support of the Case Condition is suggested by Henry's (1992) account of so-called Singular Concord in Belfast English.[14] Henry observes that in some varieties of Belfast English, there is an apparent failure of subject-verb agreement with plural NPs in certain structural contexts (examples from Henry 1992):

(28) a. these machines makes a lot of noise (1)
b. them eggs is cracked (2)

This failure of agreement is interesting because it is structurally restricted; SC is not possible, for example, whenever the subject is a personal pronoun (29). Singular Concord is also impossible in inversion structures (30a); and adverbs may not intervene between the subject and the verb in SC contexts, something which is fully grammatical whenever there is subject-verb agreement (30c-e):

(29) a. *they makes a lot of noise (3)
(30) a. *is the eggs cracked (4)
b. the girls has left
c. *the girls probably has left (38b)
d. the girls probably have left (38a)

To account for the distributional contrasts, Henry proposes that in those structures displaying SC, the subject NP fails to raise to [Spec,AgrP]. In the absence of this subject-raising:

[14] The term *Singular Concord* is attributed by Henry (1992) to sociolinguistic literature; she cites Policansky (1982), Milroy (1983) and Finlay (1988). In the present context, given the related discussion of *Negative* Concord, the term is unfortunately rather counter-intuitive; here, concord appears to mean just the opposite of agreement.

... no agreement affix is created and the verb receives a Tense marking only ... [This is possible in Belfast English because] ... in that variety an NP can get Case in the [Spec,TP] position ... (Henry 1992:2)

In support of this analysis relating Case to the Tense projection, Henry notes that for many speakers of this variety of Belfast English, the availability of SC is restricted to simple present tense contexts. Thus, the sentences in (31) involving simple past or narrative present forms are acceptable to only a subset of those speakers who accept the examples in (28):

(31) a. them eggs was cracked
b. the teachers was busy (43)
c. the teachers goes and tells the principal about it (44)

Although this aspect of the proposal raises certain conceptual difficulties, in particular in its linking of Case-Assignment to *sub*categories of functional features, the close relationship established between Case, Agreement and word-order is very appealing.

And of course, the Singular Concord facts provides evidence for the Case Condition. What is perhaps most interesting about these two types of evidence, lexical subjects in infinitives and singular concord, is that they are not only logically independent, but they are also dialectally separate. That is, although NPIs in subject position appear to be licensed in both Belfast English and in Southern HE – in virtue of the Case-marked trace in [Spec,TP], as we claim here – the precise nature of this Case-marking is distinct in the two varieties. In Belfast English, *Nominative* NPs are not licensed in the [Spec,TP]; structures such as those in (24) are not attested in this variety. Elements which specifically require nominative case, *i.e.* pronouns, must raise higher to [Spec,AgrP] in Belfast English; this accounts for the ungrammaticality of (29). In Belfast English, then, the case assigned to [Spec,TP] is some kind of default case, whereas in Southern HE, in particular in Anglo-Irish dialects, it is Nominative case which is assigned. For NPI licensing, however, either type of case-marking seems to be sufficient for well-formedness.

Note that one immediate prediction of this analysis is that NPIs – in contrast to regular lexical subjects – should not be licensed in the subject position of HE infinitival clauses, since here NEG remains *in situ*, and the VP-internal NPI-trace is not case-marked:

(32) a. John for-to not see him ...
b. *anyone for to not go ...

Although this prediction is borne out by the available data – I have been unable to find any examples of structures parallel to (32a) – it

must remain something of a moot point, given that the absence of the structure, however suggestive, is inconclusive. Direct investigation of this point is rather difficult, however, for familiar methodological reasons; these structures are highly stigmatised in the varieties in question, much as negative concord is in Standard English.

In the next section, I will briefly consider some possible applications of the Case Condition in other languages; it will be suggested that this condition, when properly formulated, can provide a more natural account of NPI-licensing in certain problematic contexts than previous treatments have achieved. Before doing this, however, it is crucial to remedy a significant problem with the constraint; namely, that as it stands currently, it does not work. The apparent failure of the Case Condition is demonstrated by the HE sentence (15c), repeated here for convenience:

(33) you couldn't pick a daisy but it was a sin. Now, anything is no sin... (bel3-mc)

Prima facie, the grammaticality of this example would appear to be disastrous for the account we have been developing up to now. The problem is obvious: there seems to be no way in the s-structure configuration of this sentence for NEG, here the constituent negator *no*, to take scope *either* over *anything*, *or* over the trace of this NPI in [Spec,TP] (supposing that we continue to regard this as relevant).

The pressing challenge now is to come up with an account of NPI-licensing, which, on the one hand, correctly distinguishes Hiberno-English from Standard English *and* relates the empirical contrasts found to the Case properties we have just discussed, whilst simultaneously retaining the initial intuitions about the parallelism of NPI-licensing and Quantifier Scope.

I would like to suggest that this challenge can in fact be met, without altering the Case Condition in any way. The principal revision that *is* required concerns the level of representation at which the Case Condition applies. Suppose that the Case Condition must be satisfied not at s-structure, as the CSS claims, but instead at the level of logical form (LF). Let us further suppose that before the Case Condition is checked, the NEG licensor is itself subject to A'-movement into [Spec,NegP], perhaps to satisfy a version of the Neg-Criterion (Haegeman 1991, forthcoming; Rizzi 1991b). (Earlier, for ease of exposition, it was assumed that TP^cNegP; here, we re-adopt the standard analysis of the ordering of functional projections in English, in which NegP is taken to sit between AgrP and TP)[15]. Finally, we may attempt to strengthen still

[15] Notice that although the spirit of the two proposals is quite different, this is not strictly incompatible with Laka's Tense c-command condition, as given in (19) above. However, the Irish proposals developed in Duffield (1991) and briefly outlined in the next section are incompatible with the Tense c-command condition.

further the parallelism between NPI-licensing and QP-scope, by proposing that the Case Condition – as a special case of the Scope Principle (4b) – interacts with, and is constrained by the Minimal Binding Requirement. NPI licensing will then be determined through the interaction of the three principles below:

(34) a. NEG Condition:
Negative Elements (including Negative Quantifiers) must raise to NegP by LF.
b. The Case Condition:
For a Negative Polarity Item to be properly licensed, at least one Case-marked member of the NPI-chain must be c-commanded by NEG.
c. The Minimal Binding Requirement:
Variables must be bound by the most local potential A'-binder.

In these scheme-of-things, (33) would have the following LF representation, where all of these conditions are satisfied:[16]

(35) $[_{AgrP}$ anyone$_i$ $[_{Agrs}$ would$_k$ $]$ $[_{NEGP}$ NO$_j$ $[_{TP}$ t_i $[_{To}$ t_k $]$ $[_{VP}$ t_i $[_{V'}$ have x_j view of it$]]]]]]$

Notice that in the majority of cases involving *sentential negation*, (34a) will be automatically satisfied: either, by Neg-raising as a subcase of verb-movement to Agr; or in virtue of an ordering of functional projections, such that NegP^cTP. Furthermore, since Neg-raising need involve Raising only as high as [Spec,NegP], the ungrammaticality of NPI-subjects in Standard English remains, since the Case Condition is violated. Finally, the Minimal Binding Requirement will ensure that NPIs cannot be *topicalised* in Standard English, even though both the Case Condition and the Neg Condition would be satisfied. Consider again the problematic cases in (12), repeated below:

(36) a. *anyone$_i$, Cathy can't stand x_i
b. *anything$_i$, John gave nobody x_i

At LF, the NEG element in both of these sentences will count as the closest potential A'-binder for the variable x_i left by the moved NPI. By the Minimal Binding Requirement, NEG, rather than *anyone/anything*, must bind this variable. Consequently, the NPI will be left without a variable to bind, violating the prohibition on vacuous quantification (May 1977).

The analysis of NPI licensing presented here still faces many serious difficulties, not least of which is the somewhat ambiguous categorial

[16] It will be clear that this analysis, in spite of drawing on quite different data and initial assumptions, is in many respects similar to Progovac's 1988, 1991 analysis of NPIs as A'-anaphors. In turn, both the current proposal and Progovac's analysis owe much to Aoun's (1985) work.

status of NEG elements, which sometimes appear to be heads, and sometimes specifiers. There is also a problem with the underlying conceptual motivation for the Neg Condition (34a); though see note below.[17]This nothwithstanding, the analysis does appear to achieve the required empirical results in what, I would submit, is a conceptually appealing fashion. The conceptual advantages of the proposal are twofold. First, economy is achieved by handling NPI-licensing as a case of QP-scope determination, and dispensing with a separate, and somewhat *ad hoc* licensing condition (the CSS). Second, by treating NPI-licensing as an LF condition, we are able to formalise a rather strong intuition that negation is essentially a logico-semantic, rather than a syntactic property. Pursuing this idea – although many details remain to be worked out – it suggests a way of unifying the conditions on NPIs with those on negative scope generally. If this were possible, then the ambiguity of those cases of *metalinguistic negation*, discussed in Linebarger (1987), could be handled by the same NEG-raising mechanism which determines NPI-licensing. Consider, briefly, the examples below (adapted from Linebarger 1987):[18]

(37) a. John didn't eat garlic, because he thought it was bad for him
b. i. NOT CAUSE [he thought it was bad for him],[John eat garlic]
ii. CAUSE [he thought it was bad for him], NOT [John eat garlic]

On the basis of structural ambiguities such as these, which can only be articulated at LF, Linebarger also proposes a unified condition on NPI-licensing and negative scope, the Immediate Scope Constraint (ISC), which assumes generalised Neg-raising at LF:

> A negative polarity item is acceptable in a sentence S if in the LF of S the subformula representing the NPI is in the immediate scope of the negation operator. An element is in the immediate scope of NOT [NEG in the present paper: NGD] only if (1) it occurs in a proposition that is the entire scope of NOT, and (2) within this proposition there are no logical elements intervening between it and NOT .. (Linebarger 1987:338)

In response, Laka (1990) argues against the ISC for NPI-licensing, on the grounds that Neg-raising at LF would yield a configuration in

[17] It seems probable that the relationship between Neg and Tense which underlies the Neg Condition and the Tense c-command Condition will turn out to be related to the fact that both Neg and Tense are what might be termed *Head Operators*: that is, they both create and license Operator..variable chains (*cf.* Stowell's 1993 work on sequence-of-tense rules for evidence of this), but are contrasted with other operators in typically having head, rather than XP status. One might speculate that it is this latter property which explains why NPI licensing is not subject to the Bijection Principle (see note 3); perhaps bijection only applies to XP..XP chains. This is a complex issue, however, and must be left for future research.

[18] The LF-style representations given in (37) are adapted from Linebarger: in that paper, the exact form of LF representations is left somewhat unclear.

which NPIs in subject position would be licensed, contrary to (standard) fact:

(38) a. [IP not$_i$ [IP anyone [I had t$_j$] seen John]]
b. [IP no-one$_i$ [IP anything$_j$ [IP Patrick would give t$_j$ to t$_i$]]]

But this objection is only valid if Neg-Raising is to the highest functional projection of the clause (either AgrP or CP). If the present proposal is correct, where Neg-raising is to TP, then in the standard instance NPI subjects in [Spec,AgrP] will remain unlicensed, even at LF. In fact, cases such as (37) indirectly suggest the correctness of the present Neg-raising proposal. Notice that although there is clearly an interaction between NEG and CAUSE in (37), indicating that both function as LF operators, the ambiguity of this sentence depends on directionality; if the order of clauses is reversed, the sentence is unambiguous:

(39) a. because he thought it was bad for him, John didn't eat garlic

If NEG were really free to raise to the highest functional projection, then it might be expected that (39) should show the same ambiguity as (38); there should be nothing to prevent QR to the maximal CP/IP.

3. *Extending the Case Condition.*

Obviously, if the scope of the Case Condition were restricted to the rather parochial facts presented in the previous section, its theoretical relevance would be equally limited. Before closing therefore, it is worth briefly mentioning two possible applications of the Case Condition in other languages. (At this point, no detailed analysis of these cases can be presented; but see Duffield 1991b, 1993 for further discussion of these and of related cases in Japanese and Korean.)

3.1.1. Narrative Fronting in Modern Irish.

The Case Condition directly predicts the grammaticality of NPI-subjects in VSO languages just in case NEG appears in INFL. This might appear to be an unremarkable prediction; on the face of it, any version of the CSS would predict precisely the same effect. Assuming that the subject remains in the internal subject position [Spec,VP], where it can be case-marked, it must be c-commanded by any operator in INFL. This is illustrated by the Modern Irish example in (40):

(40) a. ní raibh aon daoine sa teach.
neg was any person in-the house
'no-one was at home'

However, the Case Condition diverges from the CSS in predicting the continuing grammaticality of NPI-subjects in Irish, even when these NPI subjects are subsequently raised to a position above NEG; since NEG will still c-command a case-marked trace of the NPI-chain. This case would appear to be instantiated in Irish in so-called Narrative Fronting contexts, discussed recently in McCloskey (1992). In that paper, McCloskey draws attention to structures in which a constituent, which may contain a negative polarity item, precedes and c-commands the NEG+INFL complex:

(Examples adapted from McCloskey 1992:41)
(41) a. greim ar bith ní fhuil sé a-ithe t (96)
bite any NEG is he ptc-eat[PROG]
'not a bite is he eating'
b. aon cheo difir ní dhein sé t (*cf.* 100)
any tiny-thing difference NEG make it t
'it doesn't make the tiniest bit of difference'

McCloskey adduces a good deal of empirical evidence to show that the XV word order displayed here is derived via adjunction to IP, the major point of his paper being that VSO word order is derived by V-movement to INFL without any subsequent movement to COMP, and that subjects remain VP-internal up to s-structure. McCloskey assumes that NEG elements originate in COMP. If this is correct, then the only way for NEG elements to appear to the right of the fronted constituent would be for them to lower to INFL after s-structure, *i.e.* at PF. This is indeed what McCloskey proposes, the PF movement being motivated, he claims, by a prosodic condition on COMP elements in Irish. In this way, NPI items are correctly licensed at s-structure, and the CSS can be maintained.

Although this might ultimately turn out to be the correct analysis, it is not without its difficulties. Aside from the familiar conceptual problems involved with lowering analyses, one potential empirical problem with this account would arise if it could be shown that the NEG elements illustrated here are not complementisers at all, but rather INFL elements. If it were the case that no CP were involved in these structures, the COMP-lowering account would be much less secure.

In Duffield (1990, 1991b), I present and justify an analysis of VSO word order in Irish, in which NEG elements are base-generated below TP, and where these elements raise only as far as the highest projected functional category. In the sentences at hand, this would be Tense, not COMP. One significant diagnostic of this analysis is the initial

consonant mutation (ICM) behaviour of NEG elements. Simplifying rather drastically, the claim is that Neg-in-COMP triggers one type of initial consonant mutation, namely *eclipsis*, whilst Neg-in-Tense triggers *lenition*. This contrast is illustrated in (42) (see Duffield 1991b, forthcoming, for details):

(42) a. ní *gh*ráim í (base form: gráim)
neg love-1sg her
'I do not love her'
b. an *ng*ránn tú í? (base form: gránn)
Q love you her
'do you love her?'
c. déir sí go *ng*ránn tú í
say she comp love you her
'she says that you love her'
d. déir sí nach *ng*ránn tú í
say she neg-comp love you her
'she says that you don't love her'

In light of this, it is interesting to note that in all of the examples presented by McCloskey, the NEG-morpheme invariably triggers lenition, rather than eclipsis. That is, there appear to be no cases such as (43), by analogy with (41b):

(43) a. *aon cheo difir nach ndeann sé t/é
any tiny-thing difference NEG make it t/it
'it doesn't make the tiniest bit of difference'

The absence of any unambiguous COMP elements in second position in these contexts is at least suggestive evidence against a COMP-lowering account. However, abandoning the COMP-lowering account would automatically force a rejection of the CSS. By contrast, the Case Condition would directly predict the grammaticality of the cases in (41) even if no CP were involved; NEG would still have scope over a case-marked trace of the NPI-chain.

It might be objected at this point that although the Case Condition would predict these structures to be grammatical, they should nonetheless be ruled out by the Minimal Binding Requirement. If narrative-fronting in Irish were equivalent to object topicalisation in English, then both structures should violate the MBR in the same way. This objection would only be valid, however, if the two structures were truly equivalent. And in fact, there is some independent evidence from a number of Celtic languages to suggest that this type of construction really involves A-movement, rather than A'-movement (see Timm 1988,

Duffield 1991a, Woolford 1991 for discussion). If this is the case, then no variable is created in these structures, and the MBR does not apply.[19]

3.1.2. Ne..Que Inversion.

One final case to be considered here, where the Case Condition may have some application, is found in Standard French; it concerns the distribution of the NPI structure *ne...que*. As is well known, the behaviour of this structure contrasts significantly with the superficially similar negative element *(ne..) personne*: whereas the latter element may appear in subject position in French tensed clauses, preverbal *que*-subjects are generally prohibited:

(44) a. je n'ai vu que deux linguistes
I NEG have seen QUE two linguists
'I have only seen two linguists'
b. *que deux linguistes ne sont venus
QUE two linguists NEG are come
'only two linguists came'

(45) a. je n'ai vu personne
I NEG have seen anyone
'I didn't see anyone'
b. personne n'est venu
anyone NEG is come
'no-one came'

The standard explanation of this contrast, which I will assume here, is that whilst *ne..que* is a negative polarity item, *personne* is a negative quantifier, and therefore is not subject to the same licensing requirement (*cf.* Zanuttini 1991, Haegeman forthcoming).

It is not the case, however that *que*-subjects are always ungrammatical; in non-finite inversion structures, *que*-subjects are quite acceptable. Pollock (1985) observes a rather interesting minimal contrast found in embedded infinitival structures: whenever the embedded clause contains a passive or unaccusative verb, *que*-subjects are quite acceptable (46): unergative and transitive verbs, by contrast, do not permit *que*-subjects (47):

[19] Topicalisation structures involving A-movement are probably not restricted to the Celtic languages. A good deal of the controversy surrounding the verb-second phenomenon in the Germanic languages stems from the equivocal status of the first constituent position, usually assumed to be the [Spec,CP], as either an A- or A'-position. *Cf.* Cardinaletti & Roberts (1991), Rizzi (1991a), Müller & Sternefeld (1993) amongst others, for discussion of this issue. See also note 7 above

(From Pollock 1985:293 *ff.*)

(46) a. ?je croyais n'être arrivés que des linguistes
I thought NEG to have arrived QUE linguists
'I thought that only linguists had arrived'

b. ?je croyais n'avoir été condamné qu'un innocent
I thought NEG to-have-been condemned QUE un innocent
'I believed only one innocent man to have been condemned'

(47) a. *je croyais n'avoir téléphoné que deux linguistes
I thought NEG to have telephoned QUE two linguists
'I thought that only two linguists had telephoned'

b. *je croyais n'avoir condamné l'intervention armée qu'un seul politicien
I believed NEG to-have-condemned the intervention mil. QUE one politician
'I believed that only one politician had condemned the military intervention'

This distinction between unaccusatives and passives on the one hand, and unergatives and transitive verbs on the other, immediately suggests an analysis in terms of Case; indeed, Pollock's main purpose in presenting these data is to motivate the language-particular Case rule in (48):

(48) NP => [+Case] when governed by V* (4)
V*= unaccusative verbs, passives and *être*

Pollock proposes that structures such as those in (46) and (47) involve an expletive *pro* in the subject position of the embedded clause, which is co-indexed with the inverted *que*-NP.[20] The grammaticality contrast between the unaccusative and unergative contexts is then derived from the fact that in (46) the $[pro_i..que\ NP_i]$ chain is case-marked (by rule (48)), whilst the unergative chain cannot receive Case. The French contrast then is fully parallel to English inversion contexts, except that these involve an overt expletive:

(49) a. there arrived three men on horseback
b. *there sang three men at the concert

Although Pollock's analysis appears to be descriptively adequate, there is one aspect of these structures which remains something of a puzzle. This is the fact that inverted *que*-subjects obligatorily trigger past participle agreement, as the following examples show:

[20] In order to rule out inversion in the absence of *ne..que*, *e.g.*, **Est venu Jean*, it is simply stipulated that 'only subject empty categories which are co-indexed with a *que-NP* can be identified as *pro*' (Pollock 1985:302(41)).

(50) a. je croyais n'être *venu/venues que trois filles
'I believed only three girls to have come'

b. je croyais n'avoir pas été *peint/peintes que deux portes
'I believed only two doors (fem.pl) to have been painted'

The obligatoriness of agreement in these cases is surprising for two reasons. The first is theoretical: within current theory, it is generally assumed that participial agreement is only triggered by object movement into or through the [Spec,Agr^{O}P] (*cf.* Kayne 1987, Sportiche 1990, for discussion). Under Pollock's analysis, however, the *que*-subject remains *in situ*; from this position it could not trigger participial agreement.

The second, empirical, reason that these facts are surprising is that in other French constructions with *overt* expletive subjects, agreement is not possible. Impersonal passives provide a good example of this:

(51) a. il a été employé beaucoup de femmes par le gouvernement
'many women were employed by the government'

b. *il a été employées beaucoup de femmes par le gouvernement
'many women were employed by the government'

Taken together, these observations raise some doubts about the correctness of Pollock's analysis; in particular, they call into question the idea that *que*-subjects remain *in situ*. Nevertheless, whatever new analysis we adopt, it would be desirable to preserve the intuition that the ungrammaticality of the structures in (47) is a direct result of their Case properties.

Once again, the Case Condition developed above may provide an interesting solution to this problem. Let us assume that Pollock's Case rule in (48) is essentially correct, but that inverted *que*-subjects have been moved – through Agr^{O}P and TP – and adjoined to Agr^{S}P. Thus, a sentence such as (46a) would have the analysis in (52):[21]

(52) $[_{AgrP}\ [_{AgrP}\ x_i\ [_{TP}\ t_i\ [\ n'être\ [_{AgroP}\ t_i{}^1\ arrivés_j\ [_{VP}\ t_j\ t_i{}^2\ _{VP}]]]]]$ que des linguistes $_{AgrP}]$

[21] This is only one of several possible analyses which would achieve the required result; other equivalent scenarios can easily be imagined. For example, one might imagine that the *que*-subject simply raises by A-movement to [Spec,Agr^{S}P], which for some reason is projected to the right. All that is necessary for the Case Condition account to go through is that NEG having adjoined to TP should c-command a case-marked trace (not a variable) of the *que*-subject.

Another interesting alternative to (52), pointed out to me by Liliane Haegeman, would be to hypothesise an expletive *pro* in [Spec,Agr^{O}] which would form a chain with the post-verbal NP. The general availability of arbitrary null-objects in French (*cf.* Rizzi 1986) lends empirical support to this idea. However, it remains unclear to me how this hypothesis would explain the main contrast between the presence of participial agreement in (50) and its absence in (51), *i.e.* why the presence of an overt subject expletive should preclude a null expletive object in [Spec,Agr^{O}].

In this structure, the Case Condition will be satisfied, since NEG will c-command a case-marked trace of the NPI-chain; either t^1 or t^2, depending on the preferred analysis. No violation of the Minimal Binding Requirement will arise, since the variable (x_i) A'-bound by the adjoined *que*-subject is situated in [Spec,AgrP], *i.e. above* NEG. On this account, the ungrammaticality of the unergative sentences in (47) follows just as directly as in Pollock's treatment, from the caselessness of the chain containing the *que*-subject. The advantage of the Case Condition account is that the agreement properties of these constructions, far from being mysterious as they would be if an expletive *pro* were involved, are entirely as expected.

Clearly, a good deal more work is required to make this analysis convincing. In particular, one would need to resolve the problem immediately posed by the grammaticality of inverted *que*-subjects in *finite* clauses in French; *prima facie*, these would seem to violate the Minimal Binding Requirement (on a first-pass analysis). However, the main aim here has simply been to show that the principles of NPI-licensing developed in response to some rather parochial Hiberno-English data can offer an interesting and profitable approach in other applications.

Finally, it is necessary to say something about the possible theoretical implications of this proposal. I have tried to show here that Quantifier Scope and Negative Polarity licensing may be subject to the same syntactic conditions, when properly understood, and that these conditions apply at LF, rather than s-structure. As noted above, this would be a positive result in the context of the Minimalist Program (Chomsky 1992), where s-structure is eliminated as an independent level of representation. Nonetheless, there remains implicit in this analysis a conceptually worrisome *ordering* of LF operations: Case-checking must apply before NPI-checking, otherwise the crucial NP-trace will remain invisible to the Case Condition. It might then seem that we have simply re-constructed 's-structure' conditions at LF. Moreover, there remains a basic asymmetry between Quantifier Scope and NPI-licensing, which is exactly that the former seems oblivious to the Case properties of chain-members. At this point, I have no simple solution to these problems; nevertheless, I would like to suggest in closing one promising avenue of inquiry.

Here, the concern has been to assimilate NPI to Quantifier Scope, and to analyse both as involving a type of Quantifier Raising (QR). Since we have now seen that NPI-licensing involves Case, and given that Case-checking under [Spec,Head] Agreement is the fundamental licensing relation within the Minimalist framework, it might turn out to be more profitable to turn the tables, assimilating Quantifier Scope to Negative

Polarity Licensing and Case-Checking.[22] Given a copying-and-deletion approach to LF-movement, scope ambiguities could be derived by deleting either the higher or lower member of the Quantifier A-chain; the fundamental asymmetry between Quantifiers and NPIs might arise from the impossibility of deleting the lower member of NPI-chains. It is clear that this suggestion, and indeed this paper as a whole, forms no more than a possible starting-point for future research in this very interesting area.

Address of the Author:

Nigel Duffield
Department of Linguistics
McGill University
1001 Sherbrooke St. W.
Montréal
Québec H3A 1G5
email: inni@musicb.mcgill.ca

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[22] This final suggestion owes a great deal to Norbert Hornstein for his explication and discussion of the Minimalist program and its consequences in his seminar (McGill, Winter 1993), and for encouraging me to think more closely about the status of QR.

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