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**Interacting Interests: Exploring the Nature of Interest
Group Coalition Building in the Regulatory State**

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REPORT

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Interacting Interests: Exploring the Nature of Interest Group Coalition Building in the Regulatory State

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The lobbying literature is rife with studies of interest groups, spanning their democratic value, successes, failures, and the tools they employ in advocating for their positions. One of these tools is coalition building, where interest groups join forces with one another in lobbying. While the literature pertaining to coalitions is theoretically vibrant, due to difficulties in collecting comprehensive empirical data, scholars have relied heavily on qualitative evidence to answer questions concerning coalition building ([Timmermans 2016](#)). Addressing this gap, this paper presents a dataset that tracks coalition building through public comments that have been co-submitted by interest groups during the notice-and-comment periods of rules proposed by federal agencies. It contains all public comments submitted by a random sample of 40 American interest groups between 1998 and 2015. Using this data, I explore the composition, recurrence, and policy emphases of interest group coalitions.

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Chapter 1

Introduction

The role of interest groups in government has long been controversial. At least as far back as 1748, political philosophers debated the consequences of special interests for the health of democracy. In *The Spirit of the Laws*, Baron de Montesquieu (1748) warned of intermediary bodies coming between the citizen and the state, Jean-Jacques Rousseau (1762) was hostile towards the pressure of wills on government in *The Social Contract*, and in *Federalist* No. 10, James Madison (1797) advocated against the mischiefs of faction.

Today, interest groups continue to play a controversial role in modern democracies. Many hold the belief that high-dollar special interests dominate policymaking by purchasing both legislators and votes, biasing the political system in favor of wealthy interests. While this may be true for some groups (or, more likely, some policy areas), not all interest groups singularly represent elite interests. Many groups that are active in Washington represent the interests of everyday Americans. For instance, the elderly, students, Native American tribes, and immigrants are all represented in some capacity by groups such as the AARP, National Student Partnerships, the Association of Village Council Presidents, or Immigration Voice.

In fact, it may be argued that while the interest group system does facilitate an “upper-class bias,” many non-upper-class interest groups play vital roles in crafting policy and shaping the policy implementation of issues very close to those of everyday Americans ([Schattschneider 1960](#), p. 34). Policymakers, while tasked with representing their constituents, are limited by institutional constraints, political capital, time, information-processing capacities, and little technical policy expertise ([Baumgartner and Jones 1993](#)). They rely heavily on outside experts and groups to provide them with information on what issues to attend to, and how to attend to them ([Jones and Baumgartner 2005](#)). Without these groups maintaining a presence for the concerns of their constituents in Washington and providing legislative aid pertaining to these concerns to receptive legislators at the appropriate junctures, the policy problems and solutions of everyday Americans would rarely receive the attention or labor necessary to push through a dense policymaking process.

If not all interest groups are impediments to democracy, and interest groups are vital to policymaking, scholars should care very much about the inner workings of these organizations. Indeed, much attention has been paid to the frequency of group lobbying, the targets of group lobbying, the issues subject to lobbying, and the achievements of group lobbying ([Baumgartner and Leech 1998](#); [Baumgartner et al. 2010](#)). This work has focused on the relationship between interest groups and their external environment, namely, the targets of their lobbying and the outcomes of their lobbying efforts.

This literature has done a sublime job of exploring the macro-level

lobbying patterns of all types of interest groups. We know that the interest group community is dominated by citizen groups (organizations representing issues with no direct connection to a business or profession), followed by trade and business associations, business corporations, and professional associations (Baumgartner et al. 2010). Driving the opinion that business runs Washington, we know that business interests often succeed because they are often unopposed (Baumgartner et al. 2010). When opposed in their lobbying efforts, particularly by citizen groups, business interests often fail (Baumgartner et al. 2010). While studies of lobbying often focus on Congress, the executive branch is targeted just as frequently, and more than half of lobbying involves dealings with a federal agency (Baumgartner et al. 2010). Resources matter for lobbying success, but not very much (Baumgartner et al. 2010). A large percentage of lobbying by groups occurs on a small percentage of issues (Baumgartner et al. 2010). Further, we know that interest groups representing disadvantaged populations are most likely to lobby on the issues of their most advantaged constituents, and least likely to lobby on the issues of their least advantaged constituents, a likely function of limited resources (Strolovitch 2007)

What has been under-explored, due in large part to limitations in data, are the *inter*-group lobbying patterns and strategies of the interest group population (Timmermans 2016). When, and why, do interest groups choose to form intentional alliances (coalitions) with one another? Are certain types of groups more likely to form coalitions? Are these coalitions enduring and based on shared interests? Are they short-lived? Are they issue-specific? Do

they recur over time? Are they limited to specific types of issues, such as “expensive” issues or issues with narrow constituencies? Is there a substantive difference between the behavior of informal coalitions and formal coalitions? And, do certain groups derive unique benefits from coalition building? Here, I address some of these questions.

This paper is an exploratory effort. It has two goals: First, to develop a dataset that appropriately identifies and tracks coalitions of interest groups and quantifies their components and policy context. Second, to examine this data and provide a descriptive analysis of the patterns that exist within it. I seek to probe three aspects of interest group coalitions: their composition, recurrence, and policy emphases.

In what may be the first comprehensive, quantitative effort to collect data on coalitions of interest groups, I have utilized public comments that have been co-submitted by groups during the notice-and-comment periods of rules proposed by federal agencies to track alliances. This focus on the regulatory stage of policymaking is justified, as we know that the lobbying of federal agencies is a common tool of interest groups, but remains a divergence from traditional work on interest group lobbying that has focused on the executive and legislative branches. I have examined every public comment submitted by a random sample of 40 American interest groups between 1998 and 2015. Defining a coalition as any instance where a public comment has been co-signed by more than one interest group, I have collected data on the size, membership, and policy issue of each coalition.

In the coming pages, I will provide an extensive overview of the work that has been published on interest groups and lobbying to date, emphasizing the literature's neglect of interest group alliances and lack of data that captures their occurrence in a generalizable fashion. I will discuss the merits and value of interest group coalitions, particularly for groups representing disadvantaged populations. I will explain the collection process and the content of the data that will be used in this paper's analysis. Finally, I will describe patterns in the data and their implications for the literature at large.

Chapter 2

Literature Review

2.1 Early Debates Over Interest Groups

Early scholars recognized that interest groups served as vehicles for the representation of organized interests in a cluttered democracy. Some of these scholars declared that all aspects of government and politics are determined by the activities of these groups (Bentley 1908). Supporting and extending this notion, others argued that interest groups allowed for the balanced, diverse representation of societal interests in government (Truman 1951). Concerning the formation of groups, Robert Dahl's *Who Governs?* (1961) posited that interests organize naturally in response to conflict, particularly when threatened by government. Alluding to the agenda-setting power of groups, he further argued that all significant interests inevitably gained agenda space by way of interest group representation (Dahl 1961).

Reacting to these arguments, a set of scholars responded with critiques based on elite bias, collective action, and interest group liberalism (Schattschneider 1960; Olson 1965; Lowi 1967). In the most damning of these critiques, E.E. Schattschneider (1960) argued that the interest group system is biased towards the upper class, leading to elite-focused representation in

politics. His famous statement, “the flaw in the pluralist heaven is that the heavenly chorus sings with a strong upper-class accent,” continues to be cited in studies of interest group politics today (Schattschneider 1960, p. 34). Responding to Dahl’s assumption that all interests eventually mobilized, Mancur Olson (1965) argued that rational individuals are unlikely to join groups without incentives, instead opting to free-ride. Olson noted that groups unlikely to offer incentives are also most likely representatives of weaker, diffuse, interests (Olson 1965). Groups representing concentrated interests, however, *are* able to offer incentives to potential members, avoiding free-riders (Olson 1965). According to Olson, this disparity almost certainly facilitates an elite bias among the groups that are able to form. He dubbed this the “collective action problem” (Olson 1965). Reacting nearly two decades later, Jack Walker (1983) suggested that diffuse interests may find ways to mobilize despite the collective action problem, through funding from patrons, charitable foundations, and more. Theodore Lowi’s (1967) approach, interest group liberalism, conceived the political system to be characterized by a weak state, vague legislation, and policymakers delegating to groups.

2.2 Contextualizing the Early Works

More recent work has sought to provide context to these early debates – scholars have extensively studied the goals of interest groups, the successes and failures of interest group lobbying, the external characteristics of the interest group population, and common tactics employed by interest groups (Baum-

gartner and Leech 1998; Baumgartner et al. 2010; Lowery and Gray 1995)

In their classic piece, David Lowery and Virginia Grey (1995) observed that the population ecology of the interest group environment has significant influence over the power of interest groups. Beth Leech et al. (2005) reported that as the capacity and number of policy issues under consideration by government have increased, so too has the interest group population. Dara Strolovitch's (2007) study of advocacy organizations indicated that even groups that exist to represent disadvantaged populations maintain an "upper-class" bias. She reported that due to limitations in resources and capital, advocacy organizations are most likely to lobby on the interests of their most advantaged constituents, and least likely to lobby on the interests of their intersectionally disadvantaged constituents. Mark Smith (2000) explained the overwhelming presence of business groups in Washington by theorizing that corporate lobbying is "sticky." Once businesses begin lobbying, they recognize the value of political involvement, and seek to maintain or increase their presence in Washington.

2.3 The Goals and Effectiveness of Interest Group Lobbying

Interest groups may be broadly defined as organizations that seek to influence government action on a political or policy issue. Lobbying, then, is the action involved in influencing government actors on the topic of a political or policy issue. Interest groups can represent the interests of *industries*, such

as oil or agriculture, *occupations*, such as fishermen or construction workers, or *individuals*, such as socioeconomic or racial minorities.

In lobbying government, groups may have several different goals: Groups may lobby for the purpose of maintaining their presence, reputation, or friendly relationships with policymakers. They may lobby to defend or oppose a status quo public policy – that is, creating or joining a policy debate to convince policymakers that an existing policy should be maintained, or that an existing policy should be changed or overhauled completely (Baumgartner et al. 2010). They may also lobby in order to convince policymakers to innovate policy solutions to existing problems. And, at the regulatory level, groups may lobby for the purpose of shaping the delivery of policy goods to their constituents (Yackee and Yackee 2006).

The question remains: How effective are interest groups in achieving their goals? Some scholars have argued that the effects of group lobbying are not evident in the floor vote choices of legislators, but in their committee deliberations (Hall and Wayman 1990). Interest group lobbying does not buy votes, but time (Hall and Wayman 1990). Frank Baumgartner et al. (2010) noted that most interest group lobbying does not result in complete policy overhaul. Rather, it often results in the maintenance of status quo policies, or slight movement towards changing status quo policies. Driven by findings such as these, scholars have probed the question of why interest groups continue lobby in the face of limited success, reporting that the off-chance of success drives continued interest group activity (Lowery 2007). While some have argued that

resources may dictate the success of interest group lobbying, Baumgartner et al. (2010) reported that resources do not matter much for lobbying success. There is little evidence to suggest that groups with more resources are more likely to enjoy higher levels of lobbying success.

Instead, success is often governed by organized lobbying. Baumgartner et al. (2010) reported that when business interests are opposed by more than one group, their likelihood of success decreases. Moreover, when opposed by citizen groups, business interests often lose (Baumgartner et al. 2010). In the regulatory arena, when interest groups coordinate the content and direction of their efforts to lobby federal agencies, they are more likely to have a significant effect on the final language of agency rules. And when interest groups mobilize in mass on a policy issue, they can expand the scope of the accompanying conflict and increase pressure on policymakers to act (Schattschneider 1960). These observations – that interest groups can enjoy high levels of success when organizing in mass – suggest that there is some value to the co-ordination of interest groups.

2.4 The Lobbying Tactics of Interest Groups

In pursuing their policy goals, interest groups can adopt an array of tactics. Since policymakers are constrained by time and expertise, political and policy information is a valuable resource that groups can provide to gain influence (Hansen 1991). However, the ability to provide information is governed by access, and not all interest groups have access to policymakers. Schol-

ars have argued that access can be gained through the consistent offering of constituent, policy, or political intelligence that is not available through any other source (Hansen 1991). Interest groups can also pursue their lobbying goals by providing legislative subsidies to policymakers (Hall and Deardorff 2006). The crafting of legislation requires high levels of issue-specific expertise which many politicians do not have. When interest groups can provide these subsidies, they increase the likelihood of achieving their goals.

Groups may also choose to pursue their goals by socializing or privatizing policy debates, that is, expanding or constricting the scope of a conflict over a policy issue (Schattschneider 1960). These tactics can moderate the flow of public attention to a particular debate – when the conflict is expanded, public attention increases, and policymakers come under pressure to act (Schattschneider 1960). When the conflict is restricted, public attention remains limited, and policymakers are under less pressure (Schattschneider 1960). Citizen groups have unique incentives to socialize conflicts, as their interests are more diffuse and their capacities, weaker. Thus, they have much to gain from taking a conflict to the streets (Schattschneider 1960). Business groups, on the other hand, have incentives to contain the scope of their policy conflicts – if their conflicts were to receive public attention, they would likely garner high levels of opposition (Schattschneider 1960).

In the event of a socialized or privatized policy debate, groups on either side of the conflict can employ various tactics to achieve their desired policy outcome. One of these potential tactics is coalition building. Citizen

groups, for example, often form coalitions with other groups in order to fight business interests, and, upon doing so, often win (Baumgartner et al. 2010). In lobbying federal agencies, the content of final agency rules closely reflects the suggestions of public comments by interest groups when interest groups submitters coordinate the direction, content, and volume of their comments to emphasize singular issue positions (Yackee and Yackee 2006). While coalition building requires a readiness to compromise and may pose risks to organizational autonomy, scholars have reiterated the value of coalitions as tactics for achieving success and minimizing threats to the continuity of groups and their goals. They have devoted effort to exploring the likelihood, value, and context of interest group coalitions (Hojnacki 1997, 1998).

2.4.1 Coalitions as Lobbying Tactics

What are lobbying coalitions? Citing John Kingdon (1984), Marie Hojnacki concisely defined lobbying coalitions as “some level of collective action between interest organizations and groups that exchange and pool their resources in order to achieve a common agenda ((Hojnacki 1997, p. 62).” Lobbying coalitions can be formal or informal, and can vary in the homogeneity or heterogeneity of their members. They may be temporary, substantive efforts, one-off instances of lip service, or enduring institutions with offices, staff, and mission statements.

There has been some peripheral work on the presence and composition of lobbying coalitions. Kay Scholzman and John Tierney (1986) and Cor-

nelius Kerwin (2003) reported that 70 percent of interest groups in the United States joined lobbying coalitions. Kevin Hula (1999) reported that 80 percent of interest groups involved in the U.S. legislative process did so in coalitions. Among interest groups lobbying on a limited sample of issues, Baumgartner et al. (2010) noted that 40 percent of interest groups reported working in alliances with other groups. Hojnacki's (1997) sample reported 60 to 82 percent of interest groups forming coalitions, with some variation across issue areas. Specific to composition, Brian Hawkinson (2005) found that when forming coalitions, corporations were most likely to do so with other corporations, while Hojnacki's (1997) findings suggested that occupational groups are the least coalition-oriented types of groups in the United States.

Beyond this, there have been two main perspectives on coalitions in the interest groups literature. First, the opinion that interest group alliances are unlikely, because organized interests require autonomy to survive, and coalitions present risks to autonomy. Interest groups often seek to become the experts or prominent representatives of a particular issue area or constituency. Tied to this is autonomy, which is critical to interest groups' prominence and expert reputation. Interest groups may avoid alliances with other groups in order to enhance their reputation in their policy niche, or distinguish themselves from other groups competing for prominence and respect in the same niche area.

Second, the opinion that collective advocacy is advantageous for groups, due to changes in the size and scope of the political system over the last several

decades. As the government's reach and policy agenda have grown, so too have the number of interest groups in the political system. This has led to increased competition among interest groups for space for their issue positions on a crowded political agenda. This has also led groups that once existed independently, to interact ([Hojnacki 1997](#); [Baumgartner and Jones 1993](#)). This opinion suggests that coalitions allow groups to enhance their effectiveness in a more complex decision-making environment. This increasingly complex environment, coupled with the decreasing dominance of individual groups in issue areas requires "more and better coalitions" ([Salisbury 1990](#), p. 218). These perspectives contextualize the environment in which interest groups make decisions about allied advocacy, but do not speak to the more specific forces that shape organizational decisions. Attacking this latter point, a set of scholars have explored the decision-making processes involved in coalition-building.

Work on the variables affecting alliance relationships has yielded a number of informative findings: Alliance relationships are affected by the range and type of information that interest groups have about their allies. This can include the scope of their allies' interest in particular issues and the character of their allies as organizations. Supporting this, Edward Laumann and David Knoke's ([1987](#)) findings indicated that within policy domains, the extent of the interaction between interest groups was governed by perceptions of the policy influence of other groups and the scope of their interests in particular issues. Others noted that coalition building is influenced by the nature of the issue of

interest – when a policy issue has multiple dimensions, agreement by coalition members on all dimensions of an issue of may be difficult, leading coalitional activity to center around only the issue components on which there is cohesive agreement (Schlozman and Tierney 1986; Loomis 1986). The desire of groups to magnify attention to their interests also incentivizes allied advocacy (Hojnacki 1997). In their classic work, Frank Baumgartner and Bryan Jones (1993) and Schattschneider (1960) alluded to this – when interest groups seek to expand the scope of a conflict on a particular issue, coalitions may prove to be uniquely useful in their ability to increase the public visibility of an issue and garner the attention of a wider range of political actors. Beyond this, Hula (1995) reported that in choosing to join coalitions, interest groups respond to strategic, selective, and symbolic incentives: groups with policy-oriented goals join coalitions in order to reduce their expenditures, shape the content of policy proposals, and define the parameters of the issue debate, while other groups join coalitions to “obtain selective benefits...such as information or timely intelligence about the policy process” (Hula 1995, p. 241). Concerning the broader policy context, Hojnacki (1997) noted that when the opponents in a policy debate are strong, groups will see greater benefits from forming coalitions.

As evidenced by this overview, as a literature, we have justified the utility of interest group alliances and developed a strong sense of the factors that govern allied advocacy. What is missing, however, is a consideration of the internal character of interest group alliances and changes in these alliances

over time. Speaking to this in the abstract, scholars have theorized that the incentives to join a coalition regulate the role that interest groups will ultimately play in the coalition structure. For example, if an issue is of primary concern to a particular group, it may initiate the coalition and be more willing to allocate more staff, money, and time to issue advocacy (Hula 1995; Loomis 1986; Berry 1977). If an issue is less central to a particular group, they will likely exert much less effort than they would if the issue were salient to their interests (Hula 1995).

In addition, much of the work on on coalitions has been qualitative, often based on case studies concerning a single issue or a single group type. Empirical work in this vein has been based on data procured from surveys and interviews of key government actors and representatives of active interest groups. This dependence on data derived from qualitative methods with limited generalizability has arguably caused a lack of conceptual clarity in the study of interest group alliances.

Chapter 3

Theoretical Expectations

Addressing these gaps in conceptualization and data, this paper explores the dynamics of interest group coalition building by focusing on the composition, recurrence, and policy emphases of interest group coalitions. Without formal hypotheses or predictions, I seek to descriptively examine the patterns of interest group coalition building. However, based on the findings of many of the scholars referenced in the previous section, I do have a set of expectations.

3.1 Composition

First, based on the notion that organized decision-making becomes more difficult and costly when there are more actors involved, I predict that most coalitions will be small and informal ([Shepsle 2010](#)). I expect formal coalitions, however, to contain more members, on average, than their informal counterparts. Since a primary incentive of coalition-building is the opportunity to cut costs, I also anticipate that coalitions will be utilized more frequently by interest groups with lower average levels of lobbying spending than the average of the broader sample. Furthermore, I expect a high level of homogeneity

among coalition members. Building off of Hawkinson’s (2005) observation that corporations are most likely to form coalitions with other corporations, I anticipate that the majority of coalition members will share the same group type – business group, citizen group, or professional association. However, I expect an interacting relationship with salience - when the policy issue targeted by the coalition is highly salient, I expect coalitions to contain more heterogeneity.

3.2 Recurrence

My data contain observations of all public comments that have been submitted by the interest groups in my sample - both comments that have been submitted in coalitions, and independently. I expect to report that most lobbying activity is not conducted in coalitions. Coalitions are costly, and only beneficial when the benefits of collective lobbying are greater than its costs. The benefits of collective lobbying are high when a policy debate is highly visible, proximate, and contentious. These conditions occur relatively infrequently in policymaking, thus, coalitions should occur infrequently.

Based on Baumgartner et al.’s (2010) observation that citizen groups make up the majority of the interest group community, and Strolovitch’s (2007) prediction that advocacy organizations (an umbrella that includes most citizen groups) with limited resources stand to gain the most from coalitions, I expect citizen groups to be the most common coalition members, as opposed to business groups or professional associations. Beyond this, because I expect citizen groups to be the most common coalition members, because citizen groups are

more likely to have limited resources, and because formal coalitions come at a higher cost (time, effort, staff etc.), I expect to observe more informal coalitions than formal coalitions. Due to their informality and non-binding nature, I anticipate that most informal coalitions will be single-instance coalitions, while most formal coalitions will recur with relative frequency.

3.3 Policy

Derived from the notion that organized alliances are tools by which interest groups can capitalize on the momentum of a policy issue, I expect coalitions to form on policy issues with comparatively higher levels of salience. And, based on the notion of multidimensionality muddling decision-making, I expect coalitions targeting policy issues with fewer dimensions to contain fewer members and a high level of homogeneity among members. Inversely, I expect coalitions targeting policy issues with high levels of dimensionality to contain more members and a high level of heterogeneity

Chapter 4

Data

In tracking the existence and characteristics of lobbying coalitions, I use an original dataset that quantifies the coalitional activity of 40 American interest groups lobbying federal agencies between 1998 and 2015. I track the coalitional lobbying activity of these groups using all public comments submitted by each of these groups during the notice-and-comment periods of proposed rules by federal agencies. Interest groups serve as the unit of analysis in this dataset. In this section, I will explain and justify my focus on bureaucratic lobbying and detail my data collection and coding process.

4.1 Justifying a Focus on Bureaucratic Lobbying

The Administrative Procedure Act (APA) dictates the process of rule-making in federal agencies. After a bill is passed by Congress and signed into law by the President, it is sent to the appropriate federal agencies for implementation through the writing of rules that regulate the mechanisms by which the law will be applied and enforced. This rulemaking process begins with the implementing agency's drafting of a proposed rule. After a rule has been drafted, it must be made available for public comment during a specified

“notice-and-comment period.” During this time period, any individual, group, or entity may submit written comments expressing their opinions on or suggestions for shaping the final rule. After this period comes to a close, the agency assesses the comments and issues a final rule, which becomes enforceable by law.

Public comments present opportunities for interest groups to lobby the bureaucracy. Recent works have studied the influence of interest group public comments on rulemaking – some have reported that public comments have significant influence over the content of final rules, while others have found no signs of such influence ([Golden 1998](#); [Cropper et al. 1992](#); [Magat et al. 1986](#)). More recent work by Susan Yackee ([2006](#)), however, demonstrated that federal agencies often amend the content of their final rules to fit with suggestions and policy recommendations proposed by the public comments of interest groups, particularly when there are high levels of agreement across interest group comments. Returning to coalitions, interest groups often submit public comments together, a form of coalitional lobbying.

Some may disagree with my use of a bureaucratic lobbying tool (public comments) to produce generalizable findings on coalitional lobbying behavior. This may be due an argument that bureaucratic lobbying behavior may differ significantly (particularly, in volume or substance) from lobbying the executive or legislative branches. However, many scholars have found otherwise – recent work has highlighted the extensive role of interest groups in shaping the content and implementation of regulations proposed and promulgated by

federal agencies (Yackee and Yackee 2006). Others have noted that more than half of interest group lobbying targets a federal agency (Baumgartner et al. 2010). Furthermore, as the governmental agenda has expanded, scholars have argued that rulemaking by bureaucracies "has become the most common and instrumental form of lawmaking" (Kerwin and Furlong 1992, p. 114). These points lend support to my decision to focus on and generalize on the basis of coalitional behavior evident in bureaucratic lobbying by interest groups.

4.2 Sample

The 40 interest groups in my sample were selected from a list of all actors and entities that filed lobbying disclosure reports with the Clerk of the U.S. House of Representatives and Secretary of the U.S. Senate between 1998 and 2015. This list was accessed through the Center for Responsive Politics (CRP), which compiles data on all actors and entities that have filed lobbying disclosure reports since the adoption of the Lobbying Disclosure Act (LDA). These years were chosen because 1998 is the year of the first set of publicly available data from the reports and 2015 is the year of the most recent set of released data from the reports.

I began the sampling process with the CRP's list. Here, it is worth noting that not all actors that submit lobbying disclosure reports are interest groups or the representatives of interest groups. Universities, think tanks, and businesses appear quite frequently in this data. In addition, an actor or entity may appear in this list as many times as they have submitted a

lobbying disclosure report over the entire tenure of the LDA. The AARP, for example, appears 31,218 times between 1999 (their first submission of a lobbying disclosure report) and 2015. Thus, after downloading the CRP's file, I dropped all duplicate observations, so that each actor or entity that has ever filed a disclosure report appeared only once. This left me with a list of all actors and entities that have actively lobbied a government actor or branch over the last seventeen years, totaling at 41,161 actors and entities. The original file with duplicates contained 6,291,926 actors and entities.

The CRP's data also classifies each actor or entity by the "category" that they represent, a classification that clarifies the substantive issue focus of each actor or entity that has filed a disclosure report. Table 2 illustrates a breakdown of the groups in my sample by category.

Table 4.1: Lobbying Activity by Category in Sample

Category	Frequency
Cotton	1
Plumbing and Pipe Products	1
Book, Newspaper, and Periodical Publishing	1
Motion Picture Production and Distribution	1
Defense	1
Gas and Electric Utilities	1
Finance, Insurance, and Real Estate	1
Venture Capital	1
Real Estate Agents	1
Accountants	1
Chambers of Commerce	1
International Trade Associations	1
Indian Gaming	1
Health, Education, and Human Resources	1
Medical Laboratories	1
Medical Devices and Supplies	1
Republican/Conservative	1
Environmental Policy	1
Lobbyists and Public Relations	1
U.S. Postal Service Unions and Associations	1
Sporting Good Sales and Manufacturing	1
Fabricated Metal Products	1
Sea Freight and Passenger Services	1
Non-Profits	2
Military	2
Churches, Clergy, and Religious Organizations	1
Employer Listed but Category Unknown	12
Total	40

4.3 Data Collection

After finalizing a sample, I turned to public comments to identify and collect data on lobbying coalitions. Using a publicly available government archive of all public comments submitted to federal agencies, for each of the 40 groups in my sample, I searched the name of the group with parameters for the desired time frame. This returned a list of all, if any, public comments that were submitted by the group. For each comment submitted by each group, I collected information pertaining to the characteristics of the coalition and policy issue of concern in the comment. I collected information on the size, membership, and formality of the coalition. I also collected information on the proposed rule targeted by the public comment. Independent of the public comments, I collected data on the lobbying spending of each group through data provided by the CRP. Finally, I coded each interest group in my sample and each member of every coalition as either a citizen group, business group, or professional association.

4.4 Variables

My dataset contains the following variables:

Coalition is a binary variable identifying whether the interest group in question formed a coalition in each public comment that they have submitted. A coalition is defined by any instance where a public comment is signed by more than one group. If a public comment was signed by more than one group, the observation received a “1.” If a public comment was submitted by only one

group, the observation received a “0.” Because coalitions may sometimes be formal, if the coalition formed was a *formal coalition* – any coalition with an official name and fixed membership, often evident in the first few paragraphs of the public comment – an additional binary variable identifying the formality of the coalition was coded. If the coalition was formal, the observation received a “1.” If the coalition was informal, the observation received a “0.”

For each coalition, I collected the *number of members* and classified each coalition member into one of three categories demarcating their *interest group type*: citizen group, business group, or professional and trade association. Under this classification system, a citizen group is any group designed to serve the public interest, including foundations and think tanks. A professional and trade association is any group representing a trade, profession, or industry, including unions and government associations. A business group is any group that represents a business, corporation, or business interests generally. Table 2 provides a breakdown of my sample by these classifications. In addition, I used these classifications to create proportions of the members of each coalition that were citizen groups, business groups, and professional and trade associations. I used these proportions to calculate (inverse) *informational entropy*, a value for each observation that reflects the level of diffusion (concentration), or *homogeneity*, in each coalition (Boydston et al. 2014). As a response to the infeasibility of collecting comprehensive data on coalitions with hundreds of members, I only collected this data on coalition members if the coalition contained fifty or less members.

Table 4.2: Interest Groups Appearing in the Sample

Type	Frequency	Proportion
Citizen Groups	14	0.35
Business Groups	4	0.1
Professional/Trade Associations	22	0.55
Total	40	1

Concerning the policy issue targeted by the coalition, I coded the *number of dimensions* evident in the proposed regulation addressed by each public comment. This variable is continuous, and is measured by the number of policy topics addressed by each proposed regulation on which a public comment was submitted. This determination was made by reading the title of the regulation and counting the number of policy topics embedded within it, using the Policy Agendas Project’s Major Topics Codebook as a guide for the universe of possible policy topics. For example, a regulation proposed by the Employee Benefits Security Administration (EBSA) concerning nondiscriminatory programs in group health plans concerns both civil rights (major topic code 2) and health (major topic code 3), and would receive a “2,” as it spans two major policy topics.

To operationalize the *saliency of the policy issue* targeted by each public comment, I collected the total number of comments on each proposed regulation. This variable contains an extremely high level of variance, with the number of comments on a regulation ranging anywhere between one and millions of comments. As a result, I took the log of this variable before including

it in my analysis.

I measure the *lobbying spending* of each group by collecting the total dollar amount spent on lobbying per group between 1998 and 2015. This variable intends to capture and control for the financial strength of each group in the sample, and each coalition member. This information was acquired from lobbying disclosure data provided by the CRP.

Finally, as a measure of *agency size*, I collected data on the staff size of the agency to which each public comment was submitted, although this variable is not employed in the analysis presented in this paper. This information was collected from data provided by the U.S. Office of Personnel and Management.

Chapter 5

Descriptive Statistics

5.1 A General Look

The data contain 499 observations of interest group lobbying activity (public comments). Of these, 296 (59%) were conducted in coalitions, suggesting that the majority of lobbying activity is carried out in coalitions. Among the groups that formed coalitions, 17% were citizen groups, 3% were business groups, and 79% were professional and trade associations. Table 3 provides a visual representation of these statistics. This is in slight opposition to my expectation that citizen groups would be the most prevalent coalition-builders in the interest group community. The disproportionately large presence of professional and trade associations may be an honest reflection of the interest group environment, but may also be a side effect of a focus on lobbying in the regulatory arena. Professional and trade associations may be disproportionately more likely to be quickly and directly affected by the actions of regulatory agencies, and may thus be incentivized to lobby federal agencies more than their citizen and business group counterparts.

Table 5.1: Coalition Building by Interest Group Type

Type	Frequency	Proportion
Citizen Groups	51	0.17
Business Groups	11	0.03
Professional/Trade Associations	234	0.79
Total	296	1

More broadly, Table 4 provides a set of descriptive statistics for some of the main variables included in the dataset. Importantly, policy salience, measured by the total number of public comments submitted on each proposed regulation, contains a high level of variance, as it ranges from a minimum of 1 to a maximum of over 4,000,000. Policy dimensionality, measured by the number of policy issues spanned in the title of each proposed regulation, contains very little variance, with all observations spanning either one or two dimensions. The number of coalition members, on the other hand, spans a diverse range - the average number of members is around 27, with a minimum of 2 and a maximum of 450. However, with a standard deviation of over 61, the median number of members, to be discussed in the following section, may be a more informative statistic.

Table 5.2: Descriptive Statistics

Variable	Obs.	Mean	Std. Dev.	Min.	Max.
No. Comments	499	105,448	522,787	1	4,339,167
Policy Dimensions	499	1.14	0.35	1	2
No. Coalition Members	296	27.26	61.25	2	450
Coalition Concentration	266	0.81	0.25	0.07	1

5.2 The Composition of Coalitions

As predicted, most coalitions are small: across 296 coalitions observed from 499 public comments, the median number of members in a coalition is 7, the average, 27. Contrary to my expectation of informal coalitions appearing more frequently than formal coalitions, the majority of coalitions were formal - out of the 296 coalitions observed, 186 (63%) were formal, while 110 (37%) were informal. Table 4 illustrates this.

Table 5.3: Formal and Informal Coalitions

Type	Frequency	Proportion
Formal Coalitions	186	0.63
Informal Coalitions	110	0.37
Total	296	1

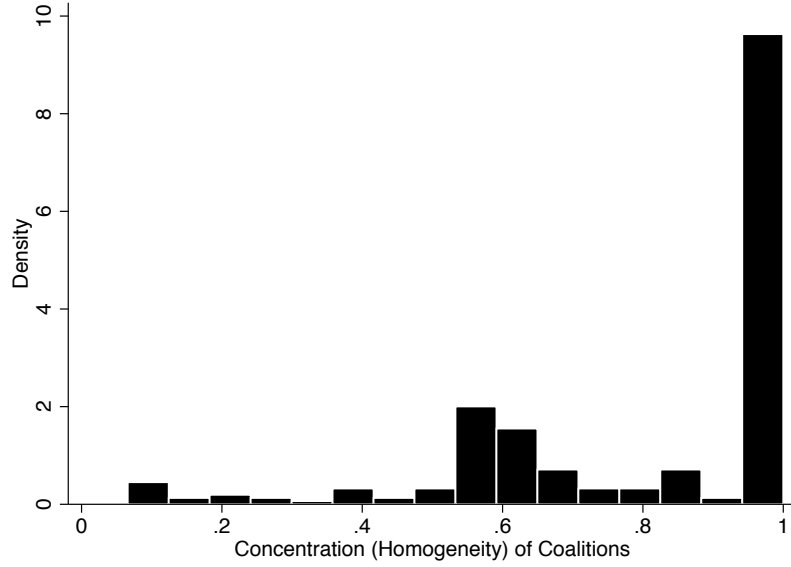
Beyond this, the use of formal coalitions varied across group type, as evidenced by Table 5. Citizen groups utilized informal coalitions twice as much as formal coalitions, whereas business groups and professional and trade associations were more than twice as likely to form formal coalitions than informal coalitions.

Table 5.4: Formal and Informal Coalitions by Group Type

Group Type	Formal	Informal	Total
Citizen Groups	17	34	51
Business Groups	8	3	11
Professional/Trade Associations	161	73	234
Total	186	110	296

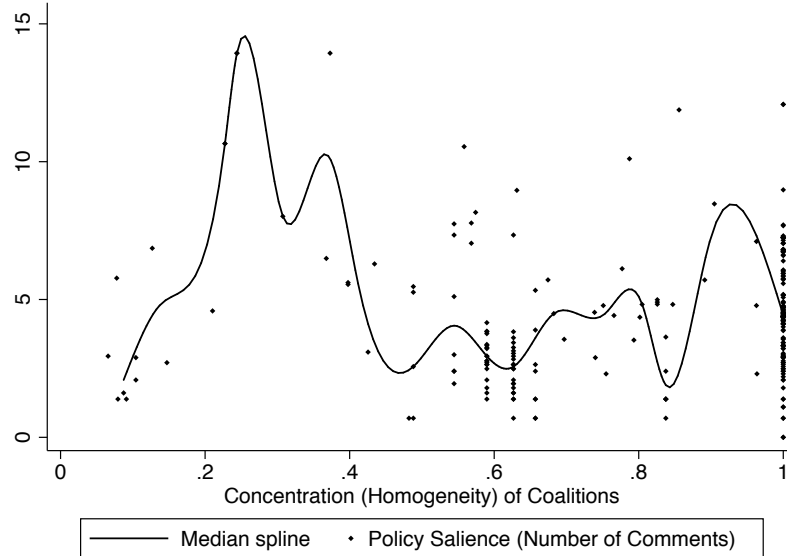
The data also illustrate a high level of (inverse) informational entropy, or homogeneity, among coalition members, as illustrated by Figure 1. Most coalitions were either entirely homogeneous, or contained some small level of heterogeneity. Table 4 provides descriptive statistics for this variable, which ranges from 0.07 to 1, with a mean of 0.81. In interpreting these numbers, a coalition with an (inverse) informational entropy of 1 was 100 percent homogeneous, whereas a coalition with an (inverse) informational entropy of 0 was entirely heterogeneous. 146 (49%) out of 296 coalitions were completely homogeneous. 269 coalitions (91%) had a concentration (homogeneity) level of more than 0.5, and 282 (95%) had a concentration level of more than 0.3. This may lend support to theories and arguments that have been made regarding interest group coalitions revolving around friendly relationships with groups similar in goals and issues.

Figure 5.1: Homogeneity Among Coalition Members



Concerning my prediction that heterogeneity among coalition members may be tied to lobbying on policy issues with high levels of salience, Figure 2 (a scatterplot with smoothing spline fit to the data) indicates no such relationship.

Figure 5.2: Policy Saliense and Heterogeneity Among Coalition Members



5.3 Do Coalitions Recur?

Formal coalitions recurred at a moderately frequent rate. Of 31 formal coalitions observed in the data, 14 appeared only once. 17 appeared at least twice. Eight appeared between three and ten times. Two appeared between 50 and 70 times, with the International Intellectual Property Alliance appearing 52 times and the Council of Defense and Space Industry Associations appearing 61 times. Table 6 illustrates the frequency of recurrence of the formal coalitions in my data. On the recurrence of informal coalitions, I predicted that most informal coalitions would be non-repeating. However, due to the infeasibility of collecting data on patterns in the membership of informal coalitions in a limited time frame, I will not address this proposition here. A second iteration

of this report will track and discuss this pattern in informal coalition building.

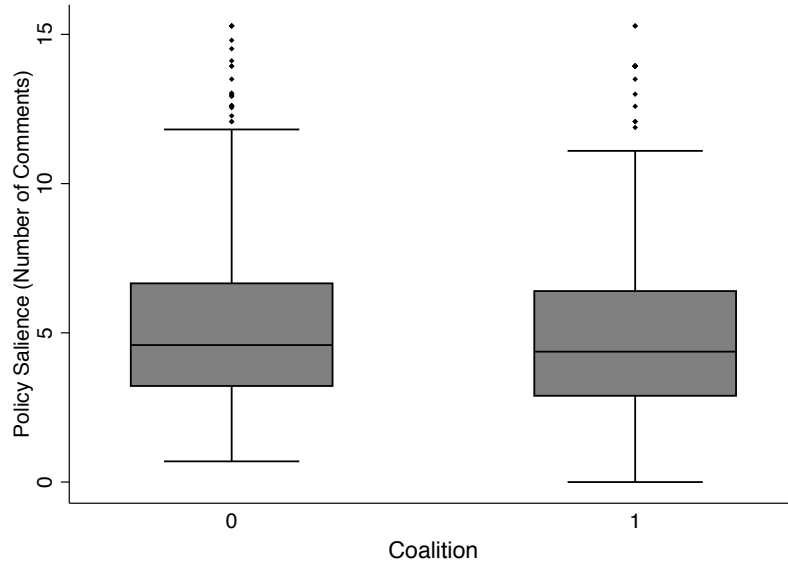
Table 5.5: Recurring Formal Coalitions

Recurrence	Frequency	Proportion
Once	14	0.45
2 - 4 times	10	0.32
5 - 7 times	4	0.13
8 - 10 times	1	0.03
50 - 60 times	1	0.03
60 - 70 times	1	0.03
Total	31	1

5.4 The Role of Policy in Coalition Building

Among my theoretical expectations were that interest group coalitions would be prevalent when lobbying on policy issues with high levels of salience. Operationalizing salience by the log of the total number of public comments made on each regulation appearing in my data, Figure 3 indicates that there was little difference between the levels of salience of policy issues that groups chose to and not to form coalitions on.

Figure 5.3: Policy Saliene and Coalition Building



Further, I also posulated that the multidimensionality of the policy issues subject to lobbying would play a role in the composition of coalitions - that is, that coalitions concerning policy issues with higher levels of dimensionality would contain fewer members and a higher level of homogeneity, and vice versa. However, across the 499 regulations associated with the public comments in my data, more than 90% spanned only one dimension, making the examination of this theoretical expectation difficult. The lack of variance within thhis variable not necessarily suggest that federal regulations are nearly always unidimensional, but perhaps that the operationalization of this variable may not have sensitively reacted to the indicators of multidimensionality within regulations. Rather than report descriptive results based on a sub-

optimal variable, I will not address this theoretical proposition here, and will instead discuss it in a later iteration of this report.

Chapter 6

Discussion

This paper has sought to descriptively explore patterns in coalition building among American interest groups. My findings lend empirical support to many qualitative theories of organized alliances. My data support, for instance, the notion that interest groups are likely to ally with groups that share similar interests. Using a measure of (inverse) informational entropy, I have also lent support to my own theory that interest group coalitions are predominantly homogeneous, the first step in an empirical exploration of the concentration of interest group coalitions. In examining the behavioral differences between formal and informal coalitions, my data indicated that citizen groups are more likely to join informal coalitions, while business groups and professional and trade associations are more likely to join formal coalitions. In addition, it has indicated that there is little to no relationship between coalition building and policy salience – groups are no more likely to form coalitions on policies that are highly salient than those that have moderate to low levels of salience. Broadly, this paper is the first step in a line of research that will vigorously study the components of and factors affecting coalitions of interest groups.

This project will benefit from a number of improvements. First, the CRP's data also classifies each actor or entity by the sector that they represent. For instance, citizen groups that represent specific issues or populations, such as the NAACP or the Disability Rights Education and Defense Fund, are classified under the "Ideological/Single-Issue" sector. There are fifteen sectors total: agribusiness, communications and electronics, construction, defense, energy and natural resources, finance/ insurance/real estate, health, ideological/single-issue, labor, lawyers and lobbyists, miscellaneous business, miscellaneous manufacturing and distributing, transportation, other, and unknown. Each sector is represented to varying degrees in the lobbying population. Some sectors, such as health, are characterized by high levels of lobbying activity, while others, such as labor, are characterized by comparatively lower levels of lobbying activity. In the sample presented in this paper, I randomized the selection of 40 groups - this randomization presumably provided me with a set of groups that is representative of the broader lobbying population. However, to be sure of the representative quality of my sample, going forward, I plan to account for the disproportionate lobbying activity of some sectors over others by applying weights. For example, if 14 percent of lobbying disclosure filings are from actors or entities representing the health sector, then 14 percent of the groups in my sample would also be representatives of the health sector. For reference, Table 8 presents the frequency and proportions of lobbying activity by sector over the last seventeen years, measured using the number of actors and entities appearing in each sector in the CRP's data.

Table 6.1: Lobbying Activity by Sector, CRP Data, 1998-2015

Sector	Frequency	Percent
Agribusiness	918	2.23
Communications, Electronics	2,618	6.36
Construction	895	2.17
Defense	1,133	2.75
Energy, Natural Resources	2,652	6.44
Finance, Insurance, Real Estate	3,030	7.36
Health	5,955	14.47
Ideological/Single-Issue	1,821	4.42
Candidate and Party Committees	1	0.002
Labor	218	0.53
Lawyers, Lobbyists	870	2.11
Miscellaneous Business	2,573	6.25
Manufacturing, Distributing	1,659	4.03
Transportation	1,813	4.4
Other	3,699	8.99
Unknown	11,306	27.47
Total	41,161	100

Second, as previously mentioned, the system I utilized to code the number of dimensions per policy issue may benefit from some adjustment. In this report, I collected the data for this variable by counting the number of potential policy topics evident in the title of the proposed regulation pertaining to each public comment, with the Policy Agendas Project's list of major topics serving as the universe of possible policy topics. This number served as the number of dimensions embedded in each policy. This method yielded a variable with very little variation, indicating either that regulations are most often unidimensional, or that the coding method was flawed. Going forward, I plan

code on the basis of the *summary* of the regulation, rather than the title. Examining the entire summary will provide me with a stronger sense of the content and aims of the regulation, which will enable me to more accurately determine the number of policy dimensions encompassed by it.

Third, while I proposed expectations for patterns in the recurrence of informal coalitions (namely, that they would recur infrequently), due to the infeasibility of tracking and collecting this data in a limited period of time, I did not address the findings related to this proposition in the previous section. Going forward, I plan to closely examine each informal coalition in my data, assigning a unique identifier to each unique set of groups. This will allow me to visually and empirically track instances in the repetition of informal coalitions over time.

Finally, beyond these measurement improvements, I plan to expand the broader project on two dimensions: In terms of data, to corroborate the findings of my data, I seek to track coalitions in a similar way using amicus curiae briefs that have been co-submitted by coalitions of interest groups to the U.S. Supreme Court. This expansion to a second branch of government will serve as an additional novel data source, and if the same coalitional patterns appear, will lend support to my findings on coalitional lobbying behavior.

In addition, I plan to conduct a case study on minority interest groups. Minority interest groups represent the most disadvantaged Americans. They play an important role in shaping the content and implementation of public policies concerning their constituents. Despite inclusive goals, they are not

immune to biases in their lobbying - indeed, minority interest groups are most likely to lobby on the interests of their most advantaged constituents, and least likely to lobby on the interests of their intersectionally disadvantaged constituents ([Strolovitch 2007](#)). This behavior may be driven by limitations in resources, or the interests of patrons. Coalitions may present unique opportunities to these types of groups. Within this broader project, I aim to dissect the composition of minority coalitions and their political and policy contexts. This work would speak to the literatures on interest groups and minority politics - the former has long neglected questions of minority interest groups, while the latter has failed to empirically consider interest groups as vehicles for minority representation. More broadly, this research could identify successful and less successful types of alliances, informing the strategic choices of organizers.

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