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## **Action and Self-Determination**

*Abstract:* We naturally think that we have a capacity for self-determination; that we can determine for ourselves how we act, so that we are morally responsible for our actions. The paper discusses two very different conceptions of self-determination – freedom, or a power over alternatives, and voluntariness, or a capacity to act as we want or decide. Opposing the arguments of Frankfurt and Davidson, the paper shows that the common sense psychology of human action commits us to a conception of self-determination as freedom, and excludes any conception of it as voluntariness.

*Key Words:* self-determination, moral responsibility, freedom, voluntariness, will, decision, action

*Résumé :* **Action et auto-détermination.** Il nous est naturel de croire que nous avons une capacité d'auto-détermination en vertu de laquelle nous pouvons déterminer par nous-mêmes la façon dont nous agissons, et de ce fait sommes moralement responsables de nos actions. Ce chapitre est dédié à la comparaison de deux conceptions très différentes de l'auto-détermination : l'auto-détermination comme liberté ou pouvoir du libre choix entre possibilités alternatives et l'auto-détermination comme volonté, ou capacité d'agir comme on veut. Prenant le contre-pied des arguments de Frankfurt et de Davidson, on montre que la psychologie de l'action humaine de sens commun nous engage en faveur d'une conception de l'auto-détermination comme liberté, à l'exclusion de toute conception de celle-ci comme volonté.

*Mots-clés :* auto-détermination, responsabilité morale, liberté, volonté, vouloir, décision, action.

In what follows I shall be discussing two very different conceptions of self-determination - and their relation to two equally different conceptions of intentional action.<sup>1</sup>

### **1. ACTION AND SELF-DETERMINATION**

We ordinarily think that we have a capacity for self-determination - a capacity which is exercised in our actions. Our perceptual beliefs

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<sup>1</sup> Further development of these arguments are to be found in Pink, 2004a, and in a more popular form in Pink 2004b.

may be imposed on us by our senses; our desires and feelings may simply come over us and happen to us. But where deliberate or intentional action is concerned, it can be we ourselves who determine what we intentionally and deliberately do.

This belief that human action can be self-determined is the basis of a central ethical notion - moral responsibility. We are supposed to have a special moral responsibility for our actions and their consequences. We can be directly to blame for how we act as we cannot be directly to blame for what merely happens to us. Why can we be held morally responsible for how we act? Because it is we ourselves who determine how we act.

The idea that human action is self-determined; and that because human action is self-determined, we have a special moral responsibility for how we act - these ideas are controversial. Some philosophers deny them. But they are familiar ideas, widely understood and assented to by many ordinary people, and I want to assume them for the sake of argument. I want to consider further what self-determination might involve, and how self-determination might occur in human action. I want to consider the matter, not at the level of any special psychology or science of the mind, but at the level of common sense. I want to consider what our ordinary or everyday idea of self-determination involves. This is an inquiry into the "common sense psychology" of self-determination.

## 2. FREEDOM AND VOLUNTARINESS

One natural way of understanding self-determination is as freedom. By freedom I mean its being within our control or up to us which actions we perform. If I possess freedom, it can be up to me whether I raise my hand or let it fall, open my eyes or close them, go for a walk or stay at home. Which I do is within my control; and whichever I end up doing, I was free to do otherwise. The idea of freedom or control is the idea of a power over our action - a power which makes alternative ways of acting available to us.

This idea of freedom is familiar. We naturally think that we possess this freedom in relation to our action. Within certain limits - those limits set by our strength and resources - we think that it really can be directly up to us what actions we perform, whether we raise our hand or let it fall, whether we go for a walk or stay still.

Freedom is perhaps the most natural way of understanding self-determination. But the idea of freedom presents many problems and puzzles - the problems and puzzles which make up the free will problem. For example, there is the familiar question of whether freedom is compatible with causal determinism: if how I act is causally determined in advance by prior events outside my control, can it really be up to me - within my control - which actions I perform?

It is not surprising that, especially within English-language philosophy, there has been an attempt to avoid these problems about freedom. From the sixteenth century down to Harry Frankfurt in our day, there has been an attempt to understand self-determination, not as freedom, but as something quite different - as voluntariness. On this view, human action is self-determined, and our peculiar moral responsibility, not because we have a freedom to act otherwise, but because when we act deliberately or intentionally, we are acting voluntarily - we are doing what we ourselves have wanted or decided to do<sup>2</sup>.

To act voluntarily is to perform an action on the basis of one's will so to perform the action, in response to the real or at least apparent desirability of performing it. To raise one's hand voluntarily for example, is to raise one's hand on the basis of one's own desire, decision or intention to raise one's hand, in response to the real or at least apparent desirability of raising one's hand. On this alternative view, self-determination has nothing to do with exercising freedom. It has nothing to do with us being free to act otherwise or having control over which actions we perform. It has everything to do with our doing what we ourselves have decided that we should do.

These two ideas, of freedom and of voluntariness, are, it seems clear, quite different. Freedom is the idea of a control over alternatives, over which actions we perform. By contrast, the idea of voluntariness says nothing about having any such control over how we act. It is instead the idea of our actions having a certain special explanation. Voluntary actions are actions which are explained by a motivational response to the desirability of performing them - by, in other words, our own prior will to perform them.

### 3. WHY SELF-DETERMINATION AS VOLUNTARINESS ?

What is the appeal of voluntariness? Why have so many English and American philosophers, especially, wanted to explain the self-determination which occurs in human action in terms of voluntariness, and not in terms of freedom?

First, voluntariness does seem recognisably a form of self-determination, or at least something very closely associated with self-determination. If how you act depends on how you yourself decide to

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<sup>2</sup> See for example, Frankfurt, 1988a and Davidson, 1980a. Notice that terms such as "freedom" and "freely" are often, and somewhat confusingly, annexed to pick out voluntariness: in his 1980a, for example, Davidson talks of the possibility of our being able to do something "freely" despite at the same time not being free to act otherwise; by 'freely' it is clear that he really means voluntarily. An early and theologically motivated attempt to replace freedom with voluntariness in the theory of moral responsibility is to be found in Calvin, 1559, book 2, chapter 3. I discuss the similarities and differences between Calvin's "voluntarising" project and the modern English-language "voluntarising" project in Pink, 2004a.

act - if you are acting exactly as you decide - then it does seem to be you who is determining your own action.

Secondly, voluntariness does not face the same metaphysical problems as freedom. Causal determinism may be a threat to freedom. But it is no threat to voluntariness. My action may be causally determined in advance; but it can still be voluntary. Past events can be causally determining that I raise my hand now. But even if this is so, I can still be raising my hand voluntarily - on the basis of my own decision to raise it. It is just that these past events are causally determining the action by first causally determining my decision to perform it.

There is a third reason why English and American philosophers in particular might want to understand self-determination as voluntariness. And this lies in a dominant English-language model or theory of human action, which some call the causal theory of action, but which I shall call a voluntariness-based theory of action. To perform an intentional action, on this theory, just is to act voluntarily - to do something in response to the desirability of doing it, on the basis of and as an effect of a desire or decision or intention to do it. This is a model of human action which goes back to Thomas Hobbes, and which we find defended nowadays by, for example, Donald Davidson and his many followers<sup>3</sup>.

If we identify action itself with voluntariness, why not identify self-determination with voluntariness too? For then we can explain why action and self-determination should go together - why self-determination should be something which we exercise in our intentional action. For self-determination and action are now both being explained and defined in terms of one and the same idea - the idea of voluntariness. So it is easy to see why action and self-determination should go together.

A number of modern English philosophers, such as Bernard Williams<sup>4</sup> and Galen Strawson<sup>5</sup> argue that if our experience of our own action is what gives us the idea of self-determination in the first

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<sup>3</sup> Not that all English-language philosophers adhere to the orthodox Davidsonian causal version of the model. For example, there are philosophers who deny that actions are caused by the attitudes, the wants and decisions, which explain them. There are also philosophers who maintain that actions have agent-causes - that is that actions are effects, not of events or states, but of substances, the agents themselves. It is noticeable, though, that even these dissidents tend to associate action with voluntariness - the action may not be caused by a desire, decision or intention, but the agent is still acting intentionally insofar as he acts as he wants, decides, intends. It is that tie of action to voluntariness which is my immediate target - though I argue elsewhere that once one does make that tie, the orthodox Davidsonian causal theory is the most defensible model of action (Pink, 2004a, ch. 2).

<sup>4</sup> See for example his 1993 and his 1995a.

<sup>5</sup> See his 1986, esp. pp 109-110.

place, then the idea of self-determination which we are given must be an idea of voluntariness. And that is because our action is essentially voluntary. To act is to do something on the basis of wanting or deciding to do it, and that is how we experience our own agency. The child wants to pick up that ball lying on the floor, and finds itself managing to pick the ball up just as it wanted to do. In managing to do what it wants, the child has had, if you like, its first experience of successful self-determination. And it is from later reflecting on this experience of being able to act as we want that the idea of self-determination first comes.

On this view, any association between self-determination and freedom is a later development - and nothing more than a philosophical make-believe or fable. For the only self-determination which in fact we experience in our actions is voluntariness.

#### 4. SELF-DETERMINATION AND THE WILL

But is our experience of our own agency really an experience of voluntariness? Certainly not, I want to argue - at least on our ordinary understanding of action. Intentional action need not be voluntary; in fact it centrally occurs in forms which exclude voluntariness. In other words, I want to argue that the voluntariness-based model of action gets the common sense psychology of action badly wrong.

Going by ordinary belief, at what point in our lives do we actually determine for ourselves what we shall do? - at what point in our lives is self-determination to be found? Surely the point at which we exercise self-determination is the point at which we decide for ourselves what we shall do. I exercise my power of self-determination, not just at the point at which I voluntarily go for a walk or stay at home, but at the point at which I first decide or intend to go for a walk or stay at home. It is in deciding for ourselves and forming intentions about what we shall do that we determine for ourselves what we shall do.

That means that prior to the actions which we perform voluntarily, such as going for a walk or staying at home, there is an earlier stage at which we are already exercising self-determination. And this is the stage at which we first decide or form an intention to perform these voluntary actions. The psychological events and states of decision and intention that explain our voluntary actions are themselves cases of self-determined action. Self-determination is ordinarily understood as found not just in the voluntary, in what we do on the basis of a will to do it, but in the will itself - in the decisions and intentions by which we determine our voluntary actions.

Taking decisions and forming intentions seems itself to be a case of intentional or deliberate action. Suppose I decide to go for a walk rather than stay at home. Which I decide is my own deliberate doing.

My decisions are not events which are passive, which merely happen to me passively, like mere feelings or urges. My own decisions are my own responsibility and my own intentional doing, because I can determine for myself how I decide to act.

If decisions and intentions are self-determined, what form does this self-determination take? What kind of self-determination is to be found within the will itself? Let us consider an example. Suppose I am faced with a choice. I can take either one of two decisions. I can decide to go for a walk. Or I can decide to stay home. Now if decisions are self-determined, it must in some sense be me who determines which I decide to do. If I decide to go for a walk, it must in some sense be me who determines that I take this particular decision. But what form does this self-determination take? Is it voluntariness or is it freedom?

One hypothesis is that the self-determination is voluntariness<sup>6</sup>. It is me who determines that I take the decision in so far as I take the decision to go for a walk voluntarily, that is, on the basis of having decided to take it. But can my decision to go for a walk be taken voluntarily? It seems not. I cannot first decide that I shall decide to go for a walk, and then take the decision to go for a walk voluntarily, just on the basis of the prior decision to take it. As Thomas Hobbes put it, using the old-fashioned English term “willing” for our modern term “deciding”:

“I acknowledge this liberty, that I can do if I will, but to say, I can will if I will, I take to be an absurd speech.” (Hobbes 1654).

I cannot decide today that at 2pm tomorrow precisely I shall then take a decision to go for a walk - and expect as a result to take that decision tomorrow, at the time decided on, just on the basis of today's decision to take it then. And this does not seem a contingent matter. There seems something deeply weird about such second order decision making.<sup>7</sup>

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<sup>6</sup> For a theory of freedom of will as, apparently, a second order voluntariness of the will, see Frankfurt, 1988b. How far Frankfurt really does hold the will to be voluntary is a matter I discuss in Pink, 2004a.

<sup>7</sup> Notice that I do not rule out the following evident possibility. I might decide today that at 2 pm tomorrow I shall then make my mind up about whether to go for a walk. And so, as a result and just as decided, I make my mind up tomorrow at the due time. This possibility is no counterexample to my case. For here my decision is not that tomorrow I shall take a specific decision – say a decision to go for a walk. It is simply a decision that tomorrow I shall arrive at a decision *one way or the other*. Which specific decision I finally take tomorrow – whether a decision to go for a walk, or a decision not to go – is not something I can effectively decide in advance. My point remains: that which specific decisions I take is not voluntary – not subject to my will or my decision; though we think that what I specifically decide is my own deliberate doing, and precisely something that I can determine for myself.

Why cannot my decision to go for a walk be taken voluntarily? Well consider what decisions are like. First, any decision, such as a decision to go for a walk, is a content-bearing psychological attitude. It is a psychological occurrence which is directed at a content or object of thought - that I perform the voluntary action decided upon. For example, any decision to go for a walk has as its content or object that I go for a walk. Secondly, decisions occur as motivational responses to the desirability of this content - to the desirability of acting as decided. A decision to go for a walk motivates me to go for a walk; and it is taken in response to the desirability, real or apparent of going for a walk. If the decision is taken rationally, then that will be because going for a walk really would be a desirable thing to do. That means that the decision is going to be based on beliefs about its object - on beliefs about what going for a walk would involve, and why going for a walk would be desirable or a good idea. To argue or persuade someone into deciding to go for a walk, you need to persuade them that going for a walk would be a desirable thing to do.

Decisions to act are taken in response to the desirability of acting as decided. And that is because decisions to act have a central function - and that is the function of applying practical reason as it concerns the voluntary actions decided upon. The whole point of taking decisions about what to do, is to ensure that I perform the right - the desirable - voluntary actions thereafter. I go to the trouble of taking a decision about whether to go for a walk or stay home, so as to ensure that whichever I end up doing, whether going for a walk or staying at home, really is the right or desirable thing to do. So of course my decision to go for a walk must be based on my beliefs about what going for a walk would involve, and on whether I find going for a walk desirable.

We now see why my decision to go for a walk cannot be taken voluntarily. Remember that what we do voluntarily, what we do on the basis of a prior desire or decision to do it, is done in response to the desirability of doing it. For example, my going for a walk is done voluntarily because it is done on the basis that going for a walk would be a desirable thing to do. So, if my decision to go for a walk was taken voluntarily, it too would be taken in a similar way: on the basis that it - the decision to go for a walk - was a desirable decision to take.

But then the grounds on which the decision was based would no longer have to do with the desirability of acting as decided - they would no longer have to do with the desirability of going for a walk - and would instead have to do simply with the desirability of taking the decision itself, something which might have nothing at all to do with going for a walk. And that would be a major departure from our common sense conception of decision making.

It is one thing to take a decision, as in real life we actually always do take decisions, non-voluntarily, in response to the

desirability of the decision's content or object - in response to the desirability of acting as decided. It is quite another to take a decision voluntarily, in response to the desirability of the decision itself. To see this, consider Gregory Kavka's decision prize<sup>8</sup>. Suppose someone offered me a prize - a huge sum of money, say £1mn - just for today at 2 o'clock deciding later on to perform some mildly unpleasant action - such as drinking a very mild toxin the following day, a toxin which is mildly unpleasant, but which will cause no permanent harm. This prize, we should note, is offered simply for taking that decision at 2 o'clock. The prize has nothing to do with my subsequently acting as decided. The prize does not depend on my actually drinking the toxin. I win the prize just by taking the decision at the required time, and whether or not I ever carry the decision out. I can win the prize whether or not I ever actually drink the toxin.

The decision clearly is a desirable decision to take, because taking it wins a huge prize. Suppose then that the decision to drink the toxin could be taken voluntarily, just on the basis that taking the decision was desirable. Then at 2 o'clock I could surely take the decision voluntarily, having decided to take it in order to win the prize. But I propose to you that decisions do not really work like that. I could not take the decision just in order to win the prize. And that is because such a decision would no longer be doing anything like its proper job - which is to respond to reasons for and against its object or content, drinking the toxin. The only way I would ever actually decide to drink a toxin would be through somehow coming to see drinking the toxin as a desirable thing to do. In fact, it seems clear that if I find drinking the toxin wholly undesirable, both in itself - the toxin is mildly unpleasant - and because it clearly has no desirable effects - drinking the toxin will not win me any prizes - I shall decide not to drink the toxin.

It is the desirability of acting as decided that moves me to take a decision to act - not any independent benefits brought by the decision itself. Decisions must be taken non-voluntarily, in response to the desirability of their objects. They cannot be taken voluntarily, in response to their own desirability. And that is because deciding what to do is about ensuring that we perform the right - the desirable - voluntary actions thereafter. Which means that the function of decisions must be to respond to the desirability of their objects, the voluntary actions decided upon<sup>9</sup>.

Hobbes, we saw, denied that decisions are voluntary. His conclusion was to deny the possibility of self-determination at the point of the will. Precisely because decisions are not voluntary,

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<sup>8</sup> See Kavka, 1983.

<sup>9</sup> For further argument on this point, and a more detailed discussion of the toxin puzzle, see Pink, 1996.



Hobbes denied that decisions are self-determined. But our ordinary understanding of decisions is that though our decisions are not voluntary, they are still self-determined. It is we who determine for ourselves what we specifically decide. And if that is so, the self-determination which we exercise when we decide what to do cannot be voluntariness.

Perhaps then the self-determination which is found within the will itself must be freedom. And that is surely what we ordinarily suppose. We ordinarily think that our decisions and intentions are self-determined, not because we think that decisions are voluntary, but because we think that it is up to us, or within our control what we decide and intend to do. Whether I decide to raise my hand or let it fall - whether I decide to go for a walk this afternoon or stay in - this is entirely up to me, and I am free to decide otherwise. And it is only because of this control which I have over what I decide to do that my decisions count as self-determined - that I count as the person who determines which actions I decide to perform.

##### **5. FREEDOM AND THE PRACTICAL REASON-BASED CONCEPTION OF ACTION**

Self-determination begins then, not with voluntary action, but with the non-voluntary motivations, the decisions and intentions, which explain our voluntary actions. Self-determination begins in a kind of second order, action-generating intentional action. Self-determination begins in the action of taking decisions to act, such as a decision to go for a walk - a kind of action which is inherently and essentially non-voluntary. Self-determination begins as a freedom of the will.

Hobbes and his English-language followers can still challenge this. For they can deny that decisions really are intentional actions at all. The idea that our decisions are our own intentional doing - that they are actions which can be self-determined - they will say that this idea is just a myth<sup>10</sup>. For, as Hobbes and Davidson and many others will insist, intentional actions are by nature what we do voluntarily; and decisions are not voluntary.<sup>11</sup>

But we ordinarily suppose that decisions are actions. In which case Hobbes, Davidson and many other English-language philosophers must be wrong about action. Intentional human action cannot consist in voluntariness - in doing what we decide or want - but in something else. So what does human action consist in?

At work is a quite different understanding of intentional action from the voluntariness-based model. At work is what I call a practical

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<sup>10</sup> See for example Bernard Williams, 1993, and also 1995b.

<sup>11</sup> For such a denial that forming a specific intention is an action, see for example Davidson, 1980b.

reason-based theory of action - a model which I would argue we can find in ancient Stoicism, in scholastic philosophy as in the work of Aquinas, Scotus and Suarez, and in Kant<sup>12</sup>.

On this view, deciding to go for a walk counts as an intentional action, not because it is something that we do voluntarily - it is not - but because such a decision occurs as special mode of exercising rationality in response to a content or object of thought: a mode of exercising rationality which is distinctively practical or action-constitutive. The voluntariness-based model, as we saw, takes action to be a voluntary effect of a prior exercise of rationality in becoming motivated to act - an exercise of rationality which, as non-voluntary, is itself passive. Whereas the practical reason-based model takes action, at least in its primary form, to be a specifically practical exercise of rationality in its own right.

Remember what decisions are like. In taking a decision to go for a walk I am exercising a capacity for rationality. I am forming a rationally appraisable psychological state - a content-bearing attitude which can be appraised as rational or irrational; and I am forming the attitude as a response to its content. I am taking my decision to go for a walk in response to the real or apparent desirability of going for a walk. My decision is rational only if going for a walk actually is desirable.

This mode of exercising reason is practical or action-constitutive because it possesses a distinctive feature of action. This distinctive feature of action is goal-direction. Action is essentially goal-directed. To act is to pursue a goal; and to be pursuing a goal, to be adopting a means to an end, is to be performing an action. And a central point about decision making is that it is indeed goal-directed, just as any action is. Deciding, say, to go for a walk is something which we do as a means to an end. The whole point of my taking a decision to go for a walk is to ensure that its content comes true, and that as a result I do go for a walk.

We can see how decisions are goal-directed when we consider decision rationality further. For my decision to go for a walk to be rational, then, as we have said, going for a walk must be a desirable thing to do. But that is not enough. Deciding to go for a walk must also be likely enough to ensure that I do actually go for a walk. Which is why sensible, rational people don't take decisions about matters which their decisions clearly can't affect; since the function of decisions is to lead to their fulfilment, that a decision has no chance of doing this is a conclusive argument against taking it. I may, quite rationally, want and hope to spend my old age doing useful and

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<sup>12</sup> The idea of a practical reason-based model of action was introduced in Pink, 1997. For an historical discussion, see Pink, 2004c. Pink 2004a will constitute a full defence and elaboration of the practical reason-based model - and a companion volume, Pink 2005, will provide an account of its considerable implications for moral theory.

interesting things, rather than in idleness. But there's no point my now deciding to spend my old age being useful if that decision will have no effect - if, for example, given the long time yet to pass, no decision I took now would make any difference to my motivations in old age.

Contrast decisions with a rather different kind of content-bearing motivation - a motivation which is intuitively passive, and which we do not ordinarily see as a self-determined action. Contrast decisions with mere desires or wants. If the object of a desire or want really is desirable, the fact that holding the desire would do nothing to make its object true is no argument against simply holding the desire - against simply wanting something to happen. Indeed, we can quite rationally and sensibly want something to happen while also not only expecting but wanting it to happen, if it does, quite independently of the fact that we want it. The very desirability of what we want might entirely depend on its happening other than because we want it to happen.

I might deeply want a grown-up son or daughter to do the right thing - but to do it autonomously, entirely on their own, because they have determined for themselves what they should do, and without my influencing them in any way. Suppose I fully expect and am quite sure that whatever they end up doing, they certainly will do it autonomously - they will do it quite independently of me. That does not make it irrational for me still to want them to do the right thing. What, in those circumstances I can't rationally do is decide that they will do the right thing.

And that is because a decision is an action with a goal. A decision is an exercise of rationality which is directed at its content or object as a goal - a goal which that exercise of rationality is to attain or effect; and that makes a decision an intentional goal-directed action - an action whose rationality depends on the likelihood of its effecting that attainment. And in this case, where my child is concerned, I know that what I decide will have no effect on what my child will do. So deciding what my child will do would be pointless.

A decision is the formation of a content-bearing attitude - a response to a content or object. But this response is practical in nature, being directed at its object as to an end or goal to be attained by it. Whereas though a desire is an object-directed motivation too, it is not practical in nature. A desire is directed at its object merely as something desirable - not as an end or goal to be attained thereby. So the rationality of desiring an event to occur does not depend on the desire's being able to cause that event to occur.

### CONCLUSION

Since Hobbes, much English-language philosophy has tended to understand action in terms of voluntariness. And it has tended to understand self-determination in terms of voluntariness too. But

common sense ordinarily thinks of decisions as self-determined actions. And, as we have seen, decisions cannot be voluntary themselves. They cannot be voluntary if - as common sense ordinarily supposes - the function of decisions is to respond to the desirability of their objects, the actions decided upon. Decisions cannot be voluntary if deciding what to do is about ensuring that we perform the right - the desirable - voluntary actions thereafter.

The idea of voluntariness may be less metaphysically problematic than that of freedom. But nevertheless, our common sense idea of self-determination cannot be an idea of voluntariness. And that is related to the fact that our common sense idea of action is not an idea of voluntariness either. Our decisions are actions not because they are voluntary - they are inherently non-voluntary, as we cannot take decisions at will or as we decide - but because they are goal-directed exercises of rationality. In taking decisions, our goal is to determine our voluntary actions. So if our decisions are self-determined, that cannot be because our decisions are voluntary and must instead be because our decisions are free. If our decisions are self-determined, that must be because it is up to us - within our control - what actions we decide to perform<sup>13</sup>.

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<sup>13</sup> Further questions obviously arise - not least about what a freedom to do otherwise requires. For example, on my view, a capacity for intentional action is the capacity to make a practical exercise of reason. But is that capacity enough to constitute freedom? If not, why not? I give a fuller account of the full relation between freedom and agency in Pink 2004a.

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