

THE PRIME MINISTER AND THE PRESIDENT: A COMPARATIVE ANALYSIS OF THE HEADS OF THE EXECUTIVE IN PARLIAMENTARY AND PRESIDENTIAL SYSTEMS IN TERMS OF THEIR POWERS

Mehmet KAHRAMAN

Mustafa Kemal University, Faculty of Economics and Administrative Sciences,
Department of Public Management, kahraman88@hotmail.com

Abstract

In today's world, it is seen that presidential system through parliamentary systems or semi-presidential systems having common characteristics with these systems are generally accepted in democracies. In parliamentary systems, there is a two-winged executive, and executive powers are used by the Prime Minister. The real and unique owner of the executive is the President and all executive power is used by him/her. Function of the parliamentary system changed with a rise of political parties; the Prime Minister, leader of the ruling party, has become dominant on two powers with help of the majority. It has recently been claimed that the Prime Minister who rules the executive and the legislative is more powerful than the President in the US presidential system. In this research, it has been tried to find to what extent this claim is true by comparing the Prime Minister and the President.

Key Words: Prime Minister, President, Parliamentary System, Presidential System, Executive

BAŞKAN VE BAŞBAKAN: PARLAMENTER SİSTEMLERDE VE BAŞKANLIK SİSTEMİNDE YÜRÜTMENİN BAŞLARININ GÜÇLERİ BAKIMINDAN KARŞILAŞTIRMALI ANALİZİ

Özet

Günümüz demokrasilerinde genellikle parlamenter sistemlerle başkanlık ya da bu sistemlerin ortak özelliklerini taşıyan yarı-başkanlık sistemlerinin tercih edildiği görülmektedir. Parlamenter sistemlerde iki kanatlı bir yürütme olmakla birlikte, yürütmenin icrâi yetkileri Başbakan tarafından kullanılır. Başkanlık sisteminde yürütmenin gerçek ve tek sahibi Başkandır ve tüm yürütme yetkileri Başkan tarafından kullanılır. Siyasi partilerin ortaya çıkması ile birlikte, parlamenter sistemin işleyişi değişmiş; parlamentoda çoğunluğu sağlayan partinin lideri olan Başbakan, bu çoğunluk sayesinde her iki organa da hâkim hale gelmiştir. Son zamanlarda, yasama ve yürütmeye hâkim olan Başbakanın, Amerikan Başkanlık sistemindeki Başkandan daha güçlü olduğu tezi savunulmaktadır. Bu çalışmada Başbakan ve Başkanın konumları karşılaştırılarak, bu iddianın ne derecede gerçeği yansıttığı incelenmeye çalışılmıştır.

Anahtar Kelimeler: Başbakan, Başkan, Parlamenter Sistem, Başkanlık Sistemi, Yürütme.

1. Introduction

Today, governmental systems which are preferred for creating a democratic and stable political structure are generally parliamentary and presidential systems and semi-presidential system which is a combination of those systems. While presidential system is based on strict separation of legislative and executive bodies, parliamentary system is based on soft and balanced separation of these bodies.

In some countries which are new in democracy or do not have stable democracy, governmental systems are regarded as the reason of political instability and crises, and so either important changes in the system or transition to other systems are demanded. In our country which has about centenary parliamentary system, parliamentary system is criticized especially for its leading to instable governments and it is expressed that transition to presidential or semi-presidential systems is needed (Kuzu, 2011: 81; Yazıcı, 2005: 125; Onar, 2005: 81).

Basic justification of the ones who wish for transition to the presidential system is the fact that this system is convenient to form a stable government (Kuzu, 2011: 110-127; Fendođlu, 2011: 12). According to the ones who defend this thesis, executive body and prime minister are not wanted to be stronger with the presidential system; in the current system, the prime minister who dominates legislative and executive bodies is already stronger than the president (Kuzu, 2011: 131-136; Yazıcı, 2005: 126). In our study, status of the prime minister and the president will comparatively be analysed, and facts about those claims will be tried to be revealed.

2. Parliamentary System and Prime Minister

2.1. Parliamentary System

Parliamentary system is a system that was formed in England and that became an association in process. Prime Ministry was also developed during this development process because of some technical reasons and effects of some coincidences. It is usually admitted that the minister, who represented the first Hannover dynasty the King George since the king did not know English and could not participate in the cabinet meetings because of this, became important within the process and became "Prime Minister" (Turhan, 1989: 44-46; Güneş, 1956: 38).

Even though this system was formed in England's specific conditions and was adopted by other countries, it had different manners of application by being affected from different conditions of those countries. In other words, a pure parliamentary system was not applied in each country that adopted this system. Additionally, parliamentary systems applied in several countries like Germany, Austria, Italy, Ireland, Belgium, Denmark, Holland, Luxemburg, Iceland, Japan, Canada, Turkey, notably England and some other countries have some characteristics in common (Turhan, 1989: 43-56; Atar, 2009: 146). The features of parliamentary system can be expressed as follows:

-There is cooperation between legislation and execution,

-Execution which has dipterous structure was emerged from legislative bodies,

-Undutifulness of the president,

-Executive bodies are accountable to legislative bodies,

-Executive power can abrogate legislative power.

2.2. Prime Minister

Prime minister who was among the king's advisors and who was often advised became "*chief minister*", meaning the head of the king's advisors in the midst of the 18th century (Akbulut, 2003: 61; Punnett, 1994: 180). During that period, the prime minister's duties were helping emperor, arbitrating between the cabinet and government or representing him (Akbulut, 203: 62; Alder, 1994: 216).

In the development process of parliamentarism, especially with the creation of political parties and by being the leader of the ruling party, the prime minister's power in execution increased gradually. The necessity of having a certain majority in the parliament for the government, led collective responsibility of the cabinet, and the prime minister became the one enhancing the unity of the cabinet. Hence, "*chief minister*" became "*prime minister*" (Güneş, 1956: 64; Akbulut, 203: 62).

The prime minister was a person coordinating legislative and executive bodies and the ministers in the cabinet and he was a person who did not have an active role in execution during this period (Erdoğan, 1989: 234).

The prime minister, head of the cabinet, started to dominate legislative body since he was the leader of majority party in the parliament, and as a result political responsibility of the government became functionless (Duverger, 1973: 187). As political responsibility became functionless, the prime minister's power was affected in a positive way, and since the border between legislation and execution was removed, the prime minister had the authority to control both bodies. The parliament fairly became approving authority of the government having parliamentary majority (Savcı, 1957: 110; Duverger, 1973: 187).

In paralel with increasing duties of the government, effectiveness of executive body increased and this caused enlargement of execution's regulating functions (Ay Deniz, 2006: 133-145). Another result of this enlargement is causing the ruling party become personalised. While prime minister is dominant in parliamentary system, president has become active in presidential system. Moreover, prime minister's role within execution started to become similar with president's (Teziç, 1980: 353).

As prime minister has become more powerful in parliamentary system, some authors consider this system as "*Prime Ministerial Government*" (Crossman, 1963: 57; Mackintosh, 1977: 341). An author claiming that collective responsibility of the cabinet means collective obedience to the prime minister, who is in the center of the system, stated that the prime minister who secures uniformity between execution and legislation thanks to his party leadership strengthens his

personal management (Crossman, 1963: 54). Another writer agreeing on the same idea expressed that as the prime minister appoints the cabinet members he wants, he retains control on the ministers and he decides on issues about main policies of the government himself, he is quite powerful in the government, and so this system can be defined as “*Prime Ministerial Government*” (Brown, 1968: 116). There are also some people who object to those views and who think that the prime minister has more authority than just being “the first among the equals” in the cabinet (Jones, 1965: 185; Erdoğan, 1989: 230).

2.2.1. The Factors Strengthening the Prime Minister

The prime minister, head of the cabinet, is the one choosing ministers, changing their places of duty and unseating them, deciding on general policy of the government and enhancing this policy to run coordinately, so he is the most powerful person of the government (Sartori, 1997: 137-140). The prime minister who also has a dominant position over parliament can both assure his power due to his majority party for a certain period of time and can control activities of the parliament thanks to his majority party.

One of the most important tasks of the prime minister is deciding on cabinet members, changing their places of duty and unseating them. Since future of the cabinet depends on the prime minister, founded governments are remembered with the names of prime ministers (Erdoğan, 1989: 232). That’s why the ones wanting to be a minister or to go on their duty as a minister need to be compatible with the prime minister, and this contributes to an increase in the prime minister’s power.

Another reason of the prime minister’s power is his authority to dissolve the parliament (Turhan1995: 106). This authority legally belongs to the president, but virtually the prime minister decides to apply that power (Erdoğan, 1989: 232). That’s why the prime minister can discipline the deputies of his party with threat of dissolution. While the prime minister in Turkey does not have a role in applying this power, the chancellor of Germany is rather powerful due to constructive vote of no confidence (*Vertrauensvotum*) and power of dissolution (Sartori, 1997: 143-145; Turhan, 1989: 68).

The prime minister who is to decide on general policy of the government and to supervise application of this policy, gathers executive power on himself by taking measures about cooperation among the ministries and about coordination. Likewise, appointment of some high ranking public officials via approval of the prime minister institutionalizes his power (Erdoğan, 1989: 233).

In paralel with enlargement in the government’s scope, activities of the government develop, too. As a natural consequence of this, authority and power of the prime minister grow.

Structure of party systems is also regarded as a factor affecting the prime minister’s power directly (Turhan, 1989: 56-68). The prime minister can control all

of his party deputies thanks to party discipline and the deputies become people who support his policies unconditionally (Erdoğan, 1989: 235). Thus, not only does the prime minister dominate legislative assembly but he also makes supervision power of legislative body over the government dysfunctional.

Improvements in communication technology can affect the prime minister's position in a positive way (Sartori, 1997: 176). Because political parties' benefitting from this technology as a propaganda tool causes both catching attraction of people on party leaders and perception of political struggle as a struggle among leaders (Erdoğan, 1989: 236). Thus, voters make their selection considering the leaders instead of deputy candidates.

Finally, personal qualifications can also be regarded as a factor strengthening the prime minister. An author studying on this topic claims that history of prime ministry is in fact the history of prime ministers (Erdoğan, 1989: 236). Even though we do not agree with this opinion, it can be said that the prime minister's personal qualifications are quite effective on functioning of the government.

2.2.2. Factors Limiting the Prime Minister's Power

Besides the fact that the prime minister's power is legally limited, some of the factors strengthening his position can also limit his power.

Power of appointment ministers and some high ranking public officials, one of the most important sources strengthening the prime minister, is not a power that he can use unrestrictedly, and he has to pay regard to some political conditions and balance within the party. Therefore, the prime minister has to regard some balances for choosing ministers and appointing public officials, and he has to bargain (Turhan, 1989: 65). Besides, he also has to be careful about compatibility in the cabinet and charging the people who have special qualifications. Especially when there is an obligation for a coalition, the prime minister has to agree with the leaders of other parties forming coalition on the formation of the cabinet (Erdoğan, 1989: 238-239). Indeed, this situation was experienced in coalition governments formed in 1970s and 1990s.

Although the prime minister has not authority to dissolve the parliament, this power which belongs legally to the president in Westminster-typed parliamentary systems is left to the prime minister to decide. Additionally, the prime minister can not decide to dissolve the parliament without getting opinion of the cabinet and of authorised bodies of his party (Erdoğan, 1989: 240). This is because he would not want to be responsible for the possible results of the election since elections after dissolution would directly be related to his party. Likewise, while it is true that power of dissolution can discipline deputies - member of the prime minister's party - failure as a result of the election can lead the ruling party and the prime minister to lose power.

Another factor limiting the prime minister's power is the fact that he has a limited term of office. This factor forces him to be successful and to carry out the

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policies he promises to his electors, and prevents him to be a dictator (Erdoğan, 1989: 241). As it depends on the voters' choice for him to sustain his duty, the prime minister has to keep support of his party's voters.

Demands and repression of the party organizations also limit power of the prime minister (Erdoğan, 1989: 243). Since the prime minister owes his power to his party, he has to satisfy demands and to make some concessions for keeping support of his party and for pushing his opponents out.

Although increase in functions of the government strengthens the prime minister, it also limits his power (Erdoğan, 1989: 242). This is because of the fact that not only does the government develop as a result of increasing functions but its duties also become more complex. In this case, the prime minister has to content himself with approving decision taking and appointment of high-ranking bureaucrats, and even he may lose great part of his power in favor of the bureaucrats.

Finally, one of the reasons limiting the prime minister's power is existence of a successful opposition party in the parliament (Erdoğan, 1989: 244). An opposition party which follows policies of the government and the prime minister closely and declares their wrong and faulty activities to the public via mass media can cause the prime minister and his party to lose power with a decrease in their reliability.

3. Presidential System and President

3.1. Presidential System

Presidential system is not a system that developed in process like parliamentarism, but a system that was created through constitution accepted after long negotiations in Convention which gathered in Philadelphia in May of 1787 (Nevins and Commager, 2005: 113-132). Why the system is called with this name is because of the journalists that used like this, and it is also called as "*Presidential Government*" and "*Congress Government*" (Turhan, 1989: 32).

The system which was created in the USA has become a model for other countries preferring it and for especially Latin American countries (Sartori, 1997: 117; Kuzu, 2011: 19). This system is based on principals of "emergence of democracy and personal power" and "seperation of powers" (Özer, 1981: 18). In presidential system which is based on strict seperation of powers, legislative and executive bodies can control each other, and executive body is dominant (Kuzu, 2005:168).

Presidential system is a representative type of government "which enforces the principle of seperation of powers strictly, lets the powers to control each other, and ensures superiority of executive power" (Aldıkaçtı, 1960: 142). According to Sartori the systems where presidents are elected by public, where the president can not be dismissed before pre-decided tenure of office by the parliament, where he governs the government he appointed or where he leads them in different ways are presidential systems (Sartori, 1997: 117).

As legislative and executive powers are strictly separated in presidential system, legislative power makes legislation and the president governs the country within the frame of those laws. Coordination between the bodies is provided via “checks and balances” (Erdoğan, 2001: 174). According to checks and balances system as power is a phenomenon to give courage to a person, powers of the state can only be kept within constitutional boundaries by audit tools of opponent bodies (Turhan, 1989: 36). In other words, this system aims to stop abuse of power with the help of another power.

The elected president’s not having political responsibility is the most important characteristic of the system (Turhan, 1989: 34). The president uses all power of executive body. Ministers (secretaries) preferred by the president are advisors at his service (Lijphart, 1995: 67).

Powers that the president can use against the congress are giving reports, sending messages, using his right to veto the congress acts and calling the parliament to sessions in case of emergency. Authorities of the congress are making law, impeachment and adjudication, starting a prosecution against the president for his actions, accepting the budget, making final decision about foreign policy and approving appointments made by the president (Kuzu, 2011: 24-25).

Main characteristics of the presidential system (Kuzu, 2011: 20; Lijphart, 1995: 31; Sartori, 1997: 113; Turhan, 1989: 32; Yazıcı, 2002: 19) can be described as follows:

- Legislative and executive bodies are strictly and absolutely separated,
- The president is elected by public directly or indirectly,
- Legislative and executive bodies cannot cease existence of each other,
- The president is the one to form and govern the government,
- The president has constitutional power and responsibility.

3.2. President

In presidential system the president is directly elected by public. In the USA, where this system is best implemented, the term of office of the president is four years, and the same person can be elected as a president twice. As a person cannot be both president and a member of the congress, a congress member has to resign if he is elected as the president (Gözler, 2011: 576).

The vice-president is also elected with the president and his term of office is the same of the president. The vice-president who does not have an official duty in execution is also head of the senate. In case of the president’s death or resignation, the vice-president fulfills duties of the president until the end of the term of office (Gözler, 2011: 576).

The U.S. Constitution has given all of the executive power to the president with reference to the idea that the state can be ruled better by only one person. This is because execution governed by more than one person can divide the

society, so social unity can only be held by single-person execution (Hamilton, Madison and Jay, 1962: 70). Thus, the U.S. Founding Fathers did not agree on the idea that single-person execution would cause monarchy, on the contrary they claimed that it would not be possible to make right decisions if execution power was given to more than one person (Gül and Karagöz, 2007: 734).

The president who gets all of the power for execution following the elections becomes unrivalled during his term of office. The president is the only and real head of execution; however, he can appoint secretaries to help him. The secretaries cannot be members of the congress, and their appointment actualises with approval of the senate. Since the secretaries are under the command of the president, they can always be unseated by the president (Gözler, 2011: 576).

As the president of the USA does not depend on confidence of the congress, he can not be discharged by the congress. Likewise, the president cannot dissolve the congress, either. The president cannot take part in the meetings of the congress, and he does not have the right to propose bill (Gözler, 2011: 577). Specially in cases where it is necessary to establish a coalition government prime minister in the creation of the cabinet must be reconciled with the leaders of other parties which participates in coalition government.

3.2.1. The Factors Strengthening the President

The first factor strengthening execution, accordingly the president is the fact that executive powers belong just to him. Furthermore, his legitimacy comes directly from public, and finally he is elected for a certain period of time and he cannot be discharged until the end of this time (Turhan, 1989: 35-37).

The president whose power of execution is given by the constitution represents the executive body as a whole. That is why the president who has all executive powers looks like a monarch, or passive president putting his power into practice since his power is limited to execution (Kuzu, 2011: 29).

The president who is directly elected by public does not have political or criminal responsibility towards the congress. For the presidents' impeachment mechanism to work, he must be accused by a certain majority of the House of the Representatives and be judged by the Senate headed by Federal Supreme Court Chairman. While it is theoretically possible to blame and punish the president, this mechanism has not always worked practically (Kuzu, 2011: 30). As the president has no political responsibility, he cannot be unseated and discharged until the end of his term of office. Thus, he explains the activities he did to his voters during election period in detail.

President of the USA is the head of executive body, leader of his party and representative of the country. The president who has the power to appoint and unseat all federal officers is commander in chief of the army, and he can appoint all officers in the army. He can make important decisions on foreign policy and appoint diplomatical representatives (Kuzu, 2011: 30).

While the president has no power to attend congress meetings and to propose a bill, he can sign or veto the bills the congress accepted in ten days. For a bill vetoed by the president to be accepted again, votes of two thirds majority of both sides of the congress are needed. Then, the president has to publish the bill accepted again. Thus, it can be said that the president is final decision-maker in publication of the bills as reacceptance of the bills vetoed by the president is pretty hard. Thus the presidents frequently applied their power of veto in the past (Kuzu, 2011: 41).

President has also authority to do regulatory administrative acts. Within the frame of this authority, he can pass decree laws, statutes and regulations (Turhan, 1989: 35).

In parliamentary systems the power to grant pardon for prisoners is also given to president. The USA president can forgive the ones who commit a crime against the USA (Turhan, 1989: 35).

Finally, it is possible for the president who has not power to propose bills to affect the congress's publishing bills that he wants via "messages". The president conveys his ideas implicitly about the bills he wants to be published in his messages he reads in joint sessions of the congress held every January (Gözler, 2011: 579).

One of the factors increasing the president's power in the USA is the party system the country has. There is a two party system in the country, and these are not disciplined parties. With the help of loose party discipline, especially when the president and majority of the congress are different, conflicts between legislative and executive bodies appearing in parliamentary systems are not experienced. On the contrary, the system's working is affected in a positive way. Since political parties have limited contribution to government policies in this system which is called "Ungoverned party model", government policies are substantially decided by the president (Turhan, 1989: 40).

3.2.2. Factors Limiting the President's Power

One of the president's important powers – appointing ministers, ambassadors and high-ranking public officials – comes true when the Senate approves those appointments. However, to discharge the people he appointed, the president does not need approval of the Senate (Kuzu, 2011: 31; Gözler, 2011: 578). Therefore, the president's power of appointment is a power limited by the constitution with the approval of the Senate. While it is seen that the Senate usually tends to approve appointments of the president in practice, this results from political reasons rather than legal ones (Kuzu, 2011: 31).

One of the factors limiting power of the president is about making international agreements. Like in the appointments, he needs approval of the Senate on this matter, too. In other words, for the international agreements the president made to be implemented, they have to be approved by two-thirds

majority of the Senate. As it is seen, the president's power about this subject is limited by approval of the qualified majority of the Senate.

Whereas legislative body does not have the power to supervise execution and the president's actions, executive activities are indirectly reviewed through investigation committees (Gözler, 2011: 578; Dereli, 1998: 45). Although it is not possible to unseat the president as a result of the reports created by the committees, they may cause important political effects.

The US constitution which has not given power of drawing up the budget to the president, has given this power to the Congress. While amount of appropriations needed is submitted to the Congress via a report prepared by the secretary of the treasury, the budget is drawn up by the Congress. Hence, the power to define appropriations in the budget, to limit and to approve some appropriations belongs to the Congress.

That the parties are undisciplined can also be considered as a factor limiting the president's power. The parties which have a loose supervision on members of the House of Representatives have no power on the senators. That's why the president can never be sure about decisions to be made by the Senate even if he has majority of the parliament (Gürbüz, 1987: 99).

Repression of public opinion can also be considered among the factors limiting the president's power. The president has to bear criticism and even accusation of either his supporters or the ones against him. Indeed, presidents were accused of malversation, atheism, counterfeiting. Moreover, they suffered an affront and even they were killed (Kuzu, 2011: 24). The president has to bear all those accusations and stay within constitutional boundaries.

4. Position of President and Prime Minister In Terms of Their Power

It would be better to make comparison and contrast based on party systems about this topic. Existence of two undisciplined parties in presidential system gives president prominence. However, in parliamentary systems are disciplined two-party or multi-party systems adopted, and operation of the regime changes depending on the party system (Turhan, 1989: 56-66). Prime minister has quite strong position in disciplined and two party parliamentary systems because of existence of a strong government. On the other hand, weak governments and prime ministers are faced in multi-party parliamentary systems as a result of necessity of minority and coalition governments.

It is claimed that multi-party system stems from highly preferred proportional representation. In other words, proportional representation system is always together with multi-party systems (Sartori, 1997: 46; Özbudun, 1977: 143; Duverger, 1970: 323-334). In fact, generally were coalition governments created in our country during 1961 constitution period with proportional representation's appearance (Turhan, 1989: 66).

Contrary to parliamentary system in which unified governments are faced thanks to party discipline, there are divided governments in presidential systems. Divided governments have a critical importance in working of presidential system. This is because of the fact that the president is only dominant in execution, and he does not have freedom of action like prime minister as he is not always sure about the support of the majority in legislative body. In other words, it is not possible for him to overcome constitutional brake and balance mechanisms as prime minister does (Linz, 1995: 181). Thus, problem of divided government in presidential system weakens execution and so the president and it prevents deviations in operation of the system. The president is possible to become pretty weak and the system is possible to deadlock when he does not possess the support of legislation majority. In presidential regimes of Latin America do power of the presidential regimes result from those deviations, not from characteristics of the regime. It seems that presidents' having private methods of veto, enlargement in their ordinance power, their having exceptional powers and their power to dissolve the parliament make presidents stronger in these countries (Sartori, 1997: 125).

It can be seen that prime minister is more powerful than president in disciplined and two-party parliamentary systems. This is because of the fact that while president can only control executive body, prime minister can control both bodies as a result of the majority he has in the parliament (Erdoğan, 1997: 182-184). When president's and prime minister's positions in execution are compared, it can be seen that president is more powerful (Lijphart, 1995: 185-186). This stems from the fact that all executive powers are gathered on one person, president, in presidential system.

Consequently, it is clear that prime minister who is the leader of a disciplined party forming majority of the parliament is in a more powerful position than president in practice. Hence, prime ministers are powerful in England and Germany. Even in our country where multi-party system is preferred, prime ministers have been pretty powerful during one-party ruled governments that have parliamentary majority. However, it cannot be said that prime minister is so powerful in parliamentary systems which do not prefer Westminster-typed two disciplined parties (Linz, 1995: 177). When considered from this aspect, president who has the support of an undisciplined party has a weaker position than prime minister. Additionally, prime minister who has to satisfy parliament majority that he needs for their support may lose this support when a political problem requiring responsibility of execution occurs. However, president can be regarded free of such a risk (Linz, 1995: 177). When a comparison made in terms of microstructure of execution, it can be expressed that prime minister is in a weaker position than the US president, who uses executive powers alone, because of the government's collective structure and functioning (Erdoğan, 1989: 247).

5. Conclusion

Prime ministry is a political institution formed with effects of a number of technical reasons and coincidences within development process of the parliamentary system. Prime minister who was initially advisor of the king became chief minister of the king in the midst of the 18th century. After political parties were formed and he became leader of the ruling party, he became a leader securing uniformity of the cabinet with increasing power in execution. Power of prime minister was individualised correspondingly to the increase in actions of execution.

Prime minister's power results from some important powers such as appointing ministers and high-ranking bureaucrats, dissolving the parliament, defining general policy of the government and watching running of this policy. Likewise, structure of the party systems is also considered to be a factor affecting prime minister's power directly. Prime minister can control legislative body in addition to executive body especially in disciplined two-party systems. Personal skills prime minister has can also be regarded as a factor strengthening him.

The fact that president who comes to the power after an election has no political responsibility is the most important characteristic of the system. The constitution has given all executive powers to the president considering the fact that a government can be ruled better by a single person. The president who gets the power to use his executive powers alone as a result of the elections is in a unrivalled position during his term of office.

As the president does not get strength from confidence of the congress, he cannot be unseated by the congress. Likewise, the president cannot dissolve the congress, either. The president does not have the power to join congress meetings and to propose bills.

Main factors strengthening the president are that he has all executive powers alone, his legitimacy results directly from public opinion, he is elected for a certain period of time and he cannot be unseated until the end of this period.

The USA president is the head of execution, leader of his party and representative of the country. The president who has the power to appoint and discharge all federal officers is chief commander of armed forces, and he can appoint all military officers in the army. He can take important decisions on foreign policy, and appoint diplomatic representatives. Since the president has the power to veto the bills accepted by the congress, he has the final say about bills' coming into force. The president can introduce legislative decrees, statutory rules and orders within the frame of his power to make regulatory administrative acts. Finally, it is possible for the president to affect the congress for their proposing bills about matters he asks for via "messages".

One of the factors increasing the president's power in the USA is the party system that the country has. There is a two-party system in this country, and those

parties are not disciplined. Governmental policies are generally described by the president thanks to the loose party discipline. However, existence of undisciplined parties can also be regarded as a factor limiting power of the president. As the parties which have a loose supervision on members of the House of Representatives and no supervision over the senators, the president cannot always be sure about decisions to be taken by the senate even if he has majority in the congress.

The president can execute his power to appoint ambassadors and high-ranking public officials and to make international agreements by approval of the Senate. While the congress does not have the power to supervise executive body or the president's actions, executive activities are indirectly reviewed through investigation committees, and the reports prepared by those committees may cause important political effects. Similarly, the power to approve the budget belongs to the congress. Thus, the congress can determine appropriations in the budget limit some of the appropriations and approve the budget as it wishes.

Existence of two undisciplined parties in presidential system makes the president dominant. However, functioning of the regime may change depending on the party system in parliamentary systems. Because of the fact that powerful governments can be formed in disciplined and two-party parliamentary systems, prime minister is quite powerful. On the other hand, weak governments and prime ministers are faced in multi-party parliamentary systems as a result of necessity of minority and coalition governments.

Contrary to parliamentary system where unified governments are faced thanks to party discipline, there are divided governments in presidential systems. The problem of divided government in presidential system weakens execution and so the president and absence of it causes important deviations in operation of the system. The president is possible to become pretty weak and the system is possible to deadlock when he does not possess the support of legislation majority. In presidential regimes of Latin America do power of the presidential regimes result from those deviations, not from characteristics of the regime.

Consequently, prime minister who is the leader of a disciplined party forming majority of the parliament is in a more powerful position than president in practice. Additionally, prime minister who has to satisfy parliament majority that he needs for their support may lose this support when a political problem requiring responsibility of execution occurs. However, president can be regarded free of such a risk. When a comparison made in terms of microstructure of execution, it can be expressed that prime minister is in a weaker position than the US president, who uses executive powers alone, because of the government's collective structure and functioning.

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