Article



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Abstract

Priest, prophet, and king are three offices attributed to Christ. The threefold office is used in Vatican II as an overarching framework in its articulation of the nature of the church and the participation of all the faithful in the life and mission of Christ. The author argues that the treatment of the sensus fidelium in the council, precisely in *Lumen gentium* no. 12, is done within the narrow framework of the teaching office. He maintains that further synthesis that includes the kingly and priestly offices is needed.

Keywords

faithful, hierarchy, Lumen gentium, king, priest, prophet, sensus fidei, sensus fidelium, threefold office, tria munera, triplex munus, Vatican II

God is forever revealing Godself to humanity through Christ in the power of the Spirit. The church comes into being and discovers its mission on earth as a result of the faithful reception of the self-revelation of God. The *sensus fide-lium* is a term used retrospectively to name the Holy Spirit's gift for receiving and applying God's self-revelation to the whole church. Although the *sensus fidelium* has characterized the church since its inception, it received greater theological attention at the Second Vatican Council and during its subsequent reception. At the beginning of his pontificate, Pope Francis explained that the image of the church he wanted to project during his papacy is that of the "faithful people of God" bound together by a

Corresponding author: Anthony Ekpo Email: ekpoa@bne.catholic.net.au *"supernaturalis sensus fidei totius populi"* (the supernatural sense of faith of the entire people of God) (*Lumen gentium* no. 12).¹ Theologians today refer to this *supernatura-lis sensus fidei* as the *sensus fidelium* or the *sensus fidei*.² Regardless of the fact that many articles and books have been published on the *sensus fidelium*,³ the meaning of this ecclesial reality remains obscure and needs more elucidation.⁴

One obscurity surrounding the *sensus fidelium* is the structural placement and/or context within which the concept is treated in *Lumen gentium* (hereafter LG). The formulation of this theological insight takes place in LG no. 12 (in chapter 2, "On the People of God"), which affirms the participation of the entire people of God in Christ's prophetic office (*munus propheticum*). The rubric of the threefold office of Christ as

- 3. Some theologians narrowly focus on particular aspects of *sensus fidelium*; others provide more elaborate and systematic proposals to advance the debate. For an extensive survey of the literature on *sensus fidelium*, see Daniel J. Finucane, *Sensus Fidelium:The Use of a Concept in the Post-Vatican II Era* (London: International Scholars, 1996); John J. Burkhard, "*Sensus Fidei*: Theological Reflection since Vatican II: I. 1965–1984," and "II. 1985–1989," *Heythrop Journal* 34 (1993) 41–59, 123–36; John J. Burkhard, "*Sensus Fidei*: Recent Theological Reflection (1990–2001) Part I" and "Part II," *Heythrop Journal* 46 (2005) 450–75 and 47 (2006) 38–54.
- 4. The Vatican II documents discussed *sensus fidelium* briefly, leaving a richer theological interpretation and synthesis to be fleshed out by postconciliar reflection. This is necessary if, as Pope John Paul II in *Tertio millennio adveniente* stressed, the teachings of Vatican II are to be applied "*to the life of every individual and of the whole Church*" (no. 20, emphasis original), http://www.vatican.va/holy_father/john_paul_ii/apost_letters/documents/ hf_jp-ii_apl_10111994_tertio-millennio-adveniente_en.html.

See interview with Pope Francis entitled, "A Big Heart Open to God: A Conversation with Pope Francis," www.americanmagazine.org/pope-interview. This ecclesial understanding forms the theological framework that underpins his apostolic exhortation, http:// w2.vatican.va/content/francesco/en/apost_exhortations/documents/papa-francesco_esortazione-ap_20131124_evangelii-gaudium.html. For *Lumen gentium*, see http://www. vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_const_19641121_ lumen-gentium_en.html. All URLs cited herein were accessed December 8, 2014.

^{2.} Ormond Rush offered a nuanced explanation on the subtle difference that seems to exist between the two terms *sensus fidelium* and *sensus fidei*. According to Rush, *sensus fidei* can apply to either the individual or communal sense of faith depending on whether it is the *sensus fidei fidelis* or the *sensus fidei fidelium*. The former, *sensus fidei fidelis* (not just *sensus fidei*), refers to the sense of the faith of the individual believer, while *sensus fidei fidelium* or *sensus fidelium* refers to the corporate ecclesial sense of the faith that can be found in local communities, that is, at the parish, diocesan, and provincial levels of the church's life. There is, however, a dialectical relationship between the *sensus fidei fidelium* that enriches each other: our corporate sense of faith forms and nourishes our individual faith and vice versa. See Ormond Rush, *The Eyes of Faith: The Sense of the Faithful and the Church's Reception of Revelation* (Washington: Catholic University of America, 2009) 215–19. The relationship and difference between the *sensus fidei fidelium* is highlighted in the International Theological Commission's *Sensus Fidei* in the Life of the Church, http://www.vatican.va/roman_curia/congregations/cfaith/cti_documents/rc_cti_20140610_sensus-fidei_en.html.

priest, prophet, and king (the *triplex munus* or the *tria munera*) can be found throughout *LG*.⁵ Arguably, it constitutes the overarching framework of the constitution, but in no. 12 the council seems to treat the *sensus fidelium* exclusively with regard to the prophetic office. This presents a narrow application of the *sensus fidelium* and denies the creative overlap among the *tria munera* of Christ, in which the whole people participates. I suggest that a reinterpretation and new synthesis that extends the understanding of the *sensus fidelium* beyond *munus propheticum* to *munus sacerdotalis* and *munus regalis* is required.

In this article, I propose that all three offices relate to the Spirit's gift of faith and, by implication, to the Spirit's gift of the *sensus fidelium* embedded in the church's faith. More precisely, I argue that the expansion of the understanding of the *sensus fidelium* beyond the narrow framework of the prophetic office to the entire *tria munera* rubric will lead to a richer understanding of the *sensus fidelium* and a greater participation of all—"from the bishop to the last of the faithful" (*LG* no. 12)—in the ongoing reception of the *sensus fidelium* in the church.⁶

The Threefold Office of Christ and Lumen Gentium

The *tria munera* rubric, which states that Christ is prophet, priest, and king, is familiar to most Christians and well known in theological circles, even if the biblical and historical grounds for this rubric are often not well understood. Certainly, in the New Testament, the threefold office is nowhere applied explicitly to Christ, even though the individual offices or titles are separately mentioned or alluded to by various writers when read retrospectively.⁷ If "office" is understood in terms of Jesus Christ's empowerment by the Holy Spirit to mediate salvation as prophet, priest, and king, then the *tria munera* rubric can be seen as at least implied in the New Testament.

^{5.} Throughout this article I use the terms "three offices" (*tria munera*) and "threefold office" (*triplex munus*) interchangeably, as my research indicates that they are so used in the literature to mean the priestly, kingly, and prophetic offices of Christ.

^{6.} For an elaborate analysis of how the faithful—laity, deacons, religious men and women, priests, and bishops—share in the threefold office of Christ at the practical or pastoral level vis-à-vis the *sensus fidelium* and in the canonical structures that help them do this, see Anthony Ekpo, *The Breath of the Spirit of the Spirit in the Church: The* Sensus Fidelium and Canon Law (Strathfield, NSW: St Pauls, 2014).

On the biblical evidence of the threefold typology, see Lothar Ulrich, "Offices of Jesus Christ," in *Handbook of Catholic Theology*, ed. Wolfgang Beinert and Francis Schüssler Fiorenza (New York: Crossroad,1995) 509–12. See also Marinus De Jonge, "Messiah," in *The Anchor Bible Dictionary*, 6 vols., ed. David Noel Freedman (New York: Doubleday, 1992) 4:777–78; Marinus De Jonge, "Christ," in *Anchor Bible Dictionary* 1:914–21; Gerry Breshears, "The Body of Christ: Prophet, Priest, or King?," *Journal of the Evangelical Theological Society* 37 (1994) 3–26.

Early Christian expressions of the tria munera rubric are found in the works of Justin Martyr,⁸ Eusebius of Caesarea,⁹ Jerome,¹⁰ and Peter Chrysologus.¹¹ In the Middle Ages the term tria munera can be found in the works of Thomas Aquinas and Bonaventure.¹² From the Middle Ages up to the 19th century, the threefold office fell into disuse. The Council of Trent applied the three titles to Christ, despite the fact that in Reformed theology the tria munera were used in its treatment of Christ's salvific mission. John Calvin, a leading figure in this practice, used the tria munera to structure his Christology, soteriology, and ecclesiology.¹³ Peter Drilling asserts that in Calvin we see the beginning of the "modern movement to pattern Christian ministry on the threefold function of Christ's ministry."14 In other words, all the faithful share in and continue the work of Christ's triplex munus in the church. Calvin's proposal was taken up by other Reformed theologians in different ways: Karl Barth "subordinates the prophetic office to the others"; Gerhard Ebeling and Emil Brunner employed triplex munus significantly in their Christologies; and Wolfhart Pannenberg argued that the typological schema of the three offices has no biblical foundation.¹⁵ John Henry Newman also appealed to the triplex munus notion in his sermons.¹⁶

But how did the *tria munera* rubric make its way into the documents of the Second Vatican Council, particularly LG? Why was this rubric resurrected at the council and in its documents? Rush offers four reasons: (1) the indirect influence of the works of theologians at the time; (2) the direct influence of the *periti* involved in the drafting process as consulting experts; (3) written submissions by groups of bishops to the Doctrinal Commission during the general sessions and during the intersessions; and (4) interventions in the council *aula* by bishops speaking on their own behalf or for a group of bishops.¹⁷

According to Rush, one of the indirect or remote factors that contributed to the reception of the *tria munera* rubric during the council proceedings and its documents

- John Calvin, *Institutes of the Christian Religion*, Library of Christian Classics 20, ed. John T. McNeill, trans. Ford Lewis Battles (Philadelphia: Westminster, 1960) 494–503.
- Peter Drilling, "The Priest, Prophet, and King Trilogy: Elements of Its Meaning in *Lumen* gentium and for Today," Église et théologie 19 (1988) 179–206, at 191.
- 15. Lothar Ulrich, "Offices of Jesus Christ" 512.
- John Henry Newman, "The Christian Ministry," in *Parochial and Plain Sermons*, 8 vols. (Westminster: Christian Classics, 1966–1999) 2:300–319; "The Three Offices of Christ," Sermon V in *Sermons Bearing on Subjects of the Day* (London: Longmans, Green, 1898) 52–62.
- 17. Ormond Rush, "The Offices of Christ, *Lumen Gentium*, and the People's Sense of the Faith," *Pacifica* 16 (2003) 137–52, at 143.

^{8.} Justin Martyr, Dialogue with Trypho 86.2.

^{9.} Eusebius, *Historia ecclesiastica* 1.3.7–10.

^{10.} Jerome, Commentarium in Habakkuk, 2.3.

^{11.} Peter Chrysologus, Sermon 40.

Aquinas, Super Epistolam ad Romanos lectura 1; Super Epistolam ad Hebraeos lectura 1.1.4; Super Psalmos lectura 44.5; Summa theologiae (hereafter ST) 3, q. 22, a. 1; ST 3, q. 31, a.2; Bonaventure, Lignum vitae 39.

is theologians' accumulated works on the rubric. Among contributing theologians was John Henry Newman, whom Joseph Crehan referred to as a critical influence on the issue of the threefold typology at the council.¹⁸ Newman used the threefold typology in his homilies and writings.¹⁹

Furthermore, Rush argues, direct factors also contributed to the reappearance of the threefold typology in the council aula and the conciliar documents. Among these factors were the influence of French Dominican Yves Congar and Dutch Jesuit Sebastian Tromp.²⁰ Congar was one of the initial 29 consultors to the preparatory Theological Commission, a consultor to the Doctrinal Commission, a *peritus* to Bishop Gabriel Marie Gerrone, coadjutor of the archdiocese of Toulouse and a member of the special subcommission of "The Seven" that redrafted the Dogmatic Constitution on the Church.²¹ Before his involvement in the council, Congar had published Jalons pour une théologie du laïcat (Lay People in the Church) on the participation of the laity in each of the three offices.²² It means that the theme of *triplex munus* was already one that Congar was very conversant with and indeed one he had wrestled with prior to the council. Congar brought his wealth of knowledge in this area to the council. And Sebastian Tromp, for his part, in his Corpus Christi quod est ecclesia (1946) expounded an ecclesiology that clearly applies the *triplex munus* to the church's life and mission.²³ Before the council Tromp served on the preparatory Theological Commission, and during the council he served as secretary of the Doctrinal Commission, so he was directly involved in the drafting and redaction process for LG. As Rush observes, Tromp's preconciliar grappling with the *triplex munus* would have made him receptive to the "written submissions and *aula* interventions on the topic by bishops suggesting its more pervasive inclusion in the documents."24

Rush further argues that in addition to the direct and indirect influence of Congar, Tromp, and others, "it was particular written submissions to the drafting commission during the first intersession and certain interventions in the *aula* during the Second

- 19. Newman, "Three Offices of Christ" 52-62.
- 20. Rush, "Offices of Christ" 143-44.
- 21. The first draft was rejected because the majority of the Council Fathers found it extremely defensive. They wanted a simpler and less apologetic draft. See Gérard Philips, "History of the Dogmatic Constitution on the Church," in *Commentary on the Documents of the Vatican II*, 5 vols., ed. Herbert Vogrimler (New York: Herder, 1967–) 1:105–37; Joseph Komonchak, "The Struggle for the Council during the Preparation of Vatican II (1960–1962)," in *History of Vatican II*, ed. Giuseppe Alberigo and Joseph A. Komonchak, 5 vols. (Maryknoll, NY: Orbis, 1995) 1:167–356, at 228; and Yves Congar, *My Journal of the Council*, trans. Mary John Ronayne and Mary Cecelia Boulding, trans. ed. Denis Minns (Collegeville, MN: Liturgical, 2012).
- 22. Yves Congar, Jalons pour une théologie du laïcat (Paris: Cerf, 1953).
- 23. Sebastian Tromp, *Corpus Christi, quod est ecclesia*, vol. 1, 2nd ed. (Rome: Gregorian University, 1946).
- 24. Rush, "Offices of Christ" 144.

Joseph H. Crehan, S.J. "Priesthood, Kingship, and Prophecy," *Theological Studies* 42 (1981) 216–31.

Session which were to become critical for the adoption of the trilogy in the council."²⁵ *Aeternus Unigeniti Pater*, the 1962 preparatory schema on the church that was rejected, mentions the trilogy in passing with reference to the episcopal functions of bishops. *Concilium duce Spiritu Sancto*, the unofficial alternative schema drafted by Gérard Philips, which became the basis of the second draft considered by the Council Fathers in 1963, also mentions the *triplex munus*, "but without drawing direct parallels to ministry in the church."²⁶ Later the Fathers decided to place the chapter on the people of God before the one on the hierarchy. For Rush, Philips "seems not to have been a decisive influence in employing the trilogy as a rubric for structuring the chapter on the People of God once it was decided to place it before the chapter on the hierarchy," because Philips's understanding of trilogy in reference to a threefold ministry in the church puts "the laity's role in a relationship of dependence on the hierarchy."

One important parallel to the trilogy that is evident in the second draft, Rush notes, is the "incorporation of the rubric of the common priesthood of the People of God as an integrating category for discussing the roles of bishops and laity in the common mission of the church, the first time an ecumenical council had done so in a detailed way."²⁸ Rush goes on to assert that the notions of the people of God and the common priesthood of the faithful "were together the *initial* rubric" employed by the council Fathers "to portray a more active role for the lay faithful in the church and to ground the notion of what is common to all the baptized."²⁹ The *tria munera* rubric, however, emerged as a parallel and competitive rubric to that of the people of God and the common priesthood of all the faithful. A hermeneutic tension developed between these two rubrics. On this, Rush observes:

Some of the language of bishops calling for the three offices still uses the notion "priestly people" as the umbrella notion for discussion of the three priestly, prophetic and regal offices in the church. However, what emerges from the debate is the decision to use the notion of the three offices as a clear structuring principle for the chapter on the People of God, for its discussion on what is common to all the baptised, and for the later chapters (3 and 4) on what distinguishes the ordained and the laity. The logical tension between the rubric of the priesthood as the overarching category and the three offices as the overarching category remains in the final documents, no doubt due to the reshuffling of paragraphs and the late inclusion of some paragraphs.³⁰

^{25.} Ibid.

^{26.} Ibid.

^{27.} Ibid.

^{28.} Rush argues that, like the trilogy, the rubric of the common priesthood of the all the faithful was also "a favourite Protestant notion, particularly for Luther, and one which likewise begins to be treated in Catholic theology after the Reformation only in the twentieth century through its retrieval by the liturgical revival and *ressourcement* theologians" (ibid.). See also Werner Löser, "Priesthood of the Faithful," in *Handbook of Catholic Theology* 549–50.

^{29.} Rush, "Offices of Christ" 145.

^{30.} Ibid. 145-46.

Added to the intratextual tensions regarding the two notions are criticisms, especially in Reformed theological circles, of using the tria munera in Christian theology.³¹ Johann August Ernesti, a late 18th-century German theologian, objected that the rubric of the threefold office is not a theological formula that strictly emerged from Scripture. He argued that the *tria munera* is rather an artificial formula forced onto Scripture.32 Ernesti was later supported by Albrecht Ritschl who argued that "priest," "prophet," and "king" used in reference to the threefold rubric is superfluous and artificial in the sense that Christ's kingly office is the "chief thing" in his salvific mission.³³ In other words, for Ritschl, there was only one office: the office of Christ as king. Wolfhart Pannenberg argued that the threefold typology is not consistent with the New Testament's description of Jesus.³⁴ Pannenberg maintained that the pre-Easter Jesus seems not to have spoken of himself or seen his ministry in terms of the threefold typology. "Before Easter, Jesus . . . neither acted as king nor sought kingship for himself. The latter was the slander of his opponents, while Jesus seems to have explicitly rejected the Messianic title."³⁵ For Pannenberg, the New Testament attributes the title of king to Jesus "not because of anything he claimed for or about himself, but only because of the resurrection."³⁶ In other words, the earthly Jesus did not envisage his ministry in the combined categories of priest, prophet, and king.

However, while the objections to the *tria munera* should be taken seriously, they do not render invalid the use of this rubric, especially if the following two theological questions are kept in mind: (1) Is the richness and diversity of the New Testament description of Jesus captured by the *tria munera* rubric? (2) Are some important dimensions of Christ's life and ministry not incorporated in the threefold office? The *tria munera* rubric is a retrospective interpretation of the postresurrection Jesus that captures something of his person and ministry. The *tria munera* rubric is, therefore, a legitimate and necessary rubric for the interpretation of Jesus today. On this, Rush remarks:

We do not want to fall into the methodological trap of disqualifying out of hand as illegitimate post-resurrectional interpretations of Jesus that go beyond what may have been Jesus' own self-understanding (however that may be reconstructed). New meanings will always be found that go beyond authorial intention, but which do not necessarily contradict that authorial intention. Theologically, it may be legitimate to re-interpret Jesus in priestly, prophetic and

For further research on the issue of criticism of the *triplex munus* in Reformed theology, see George W. Stroup, "The Relevance of the *Munus Triplex* for Reformed Theology and Ministry," *Austin Presbyterian Theological Seminary Bulletin: Faculty Edition* 98.9 (June 1983) 22–32.

^{32.} Ibid. 25.

Albrecht Ritschl, *The Christian Doctrine of Justification and Sanctification*, trans. H. R. Mackintosh and A. B. Macaulay (Clifton, NJ: Reference Book Publishers, 1966) 428.

Wolfhart Pannenberg, *Jesus—God and Man*, 2nd ed., trans. Lewis L. Wilkins and Duane A. Priebe (Philadelphia: Westminster, 1977) 212–25.

^{35.} Ibid. 218.

^{36.} Stroup, "Relevance of the Munus Triplex" 19.

kingly language, if that framework is judged to be faithful to the Christ event as now perceived, and if it continues to empower future generations in the way of Jesus Christ.³⁷

Theologically, the threefold office captures the various christological images of the postresurrection Jesus and offers a dogmatic interpretation of him that coheres with the christological images of Jesus portrayed in the New Testament.

Further, regardless of the historical and hermeneutical problems that surround the *tria munera* rubric, this rubric seems to be a comprehensive way of speaking about the life and ministry of Jesus and about the church's life. The Council Fathers used the rubric as a structuring principle for ecclesiology, especially in *LG*. They saw it as a rich rubric to use in their treatment of the person and ministry of Christ and the peoples' participation in Jesus' life and ministry both individually and collectively as a church. This rubric also highlights something common to all the baptized: participation in the inner life of Christ as priest, prophet, and king. Participation in Christ's priestly, prophetic, and kingly ministry is reserved for neither the ordained nor the laity alone; it is a reality shared by all the faithful "from the bishops to all the faithful" (*LG* no. 12). Unclear to me, though, is why the Council Fathers focused on "the prophetic office" in their treatment of the *sensus fidelium* in *LG* no. 12, without incorporating the kingly and the priestly offices of Christ. This will be the major focus of my next section.

The Sensus Fidelium in Lumen Gentium No. 12

The *sensus fidelium* makes it first explicit appearance in the council documents in *LG* no. 12. The conciliar teaching on *sensus fidelium* employs a cluster of notions: the people of God; the prophetic office of Christ; the participation of the whole body of the faithful in that office; the category of witness as the mode of participation in that office; the infallibility in believing exhibited by the whole church; the supernatural gift of the *sensus fidelium* of all the faithful as a result of the pneumatic anointing of the Holy Spirit; "matters of faith and morals" highlighted as areas of competence of this pneumatic gift; the notion of an emerging consensus regarding those matters; the notion of the whole people's reception and obedience to the word of God; and the description of the active ecclesial process of that reception by four verbs: *accipit, adhaeret, penetrat*, and *applicat*.³⁸

^{37.} Rush, "Offices of Christ" 150-51.

^{38. &}quot;Populus Dei sanctus de munere quoque prophetico Christi participat, vivum Eius testimonium maxime per vitam fidei ac caritatis diffundendo, et Deo hostiam laudis offerendo, fructum labiorum confitentium nomini Eius (cf. Hebr 13,15). Universitas fidelium, qui unctionem habent a Sancto (cf. 1Io 2, 20 et 27), in credendo falli nequit, atque hanc suam peculiarem proprietatem mediante supernaturali sensu fidei totius populi manifestat, cum 'ab Episcopis usque ad extremos laicos fideles' universalem suum consensum de rebus fidei et morum exhibet. Illo enim sensu fidei, qui a Spiritu veritatis excitatur et sustentatur, Populus Dei sub ductu sacri magisterii, cui fideliter obsequens, iam non verbum hominum, sed vere *accipit* verbum Dei (cf. 1 Thess 2,13), 'semel traditae sanctis fidei' (Iud 1,3), indefectibiliter *adhaeret*, recto iudicio in eam profundius *penetrat* eamque in vita plenius *applicat*" (*LG* no. 12, emphasis added; http://www.vatican.va/archive/hist_councils/ ii_vatican_council/documents/vat-ii_const_19641121_lumen-gentium_lt.html).

Among the aspects of the *sensus fidelium* emphasized by the Council Fathers in *LG* no. 12, three are worth highlighting because of the insight they bring to my reflection on the *sensus fidelium* in this article: first, the *sensus fidelium* is the gift of the Spirit; second, it is a gift given to all the faithful in the church; and third, it is a gift of the Holy Spirit that helps the faithful adhere unfailingly to the truth of the gospel, penetrate it more deeply, and apply it more fully in daily life: *accipit, adhaeret, penetrat*, and *applicat*.

In baptism and confirmation, the Holy Spirit confers the *sensus fidelium*. That is, the Spirit is the source of the *sensus fidelium*. *Dei verbum* no. 2 declares,

In His goodness and wisdom God chose to reveal Himself and to make known to us the hidden purpose of His will (see Eph. 1:9) by which through Christ, the Word made flesh, man might in the Holy Spirit have access to the Father and come to share in the divine nature (see Eph. 2:18; 2 Peter 1:4). Through this revelation, therefore, the invisible God (see Col. 1:15; 1 Tim. 1:17) out of the abundance of His love speaks to men as friends (see Ex. 33:11; John 15:14–15) and lives among them (see Bar. 3:38), so that He may invite and take them into fellowship with Himself.³⁹

God gratuitously invites humanity to share in God's divine life, and believers are able to receive this divine self-disclosure through the divine gift of faith. Faith is a gift from the Spirit that enables us to say that loving yes to God's gratuitous self-donation to humanity. Faith, according to Heinrich Fries, is "answered revelation," "revelation accepted," or "revelation arrived at its goal."⁴⁰ The source or spiritual principle for the reception of this divine self-disclosure of God in the church is the Spirit who gives the gift of faith to every member of the church. Faith is possible only "in the Spirit," who permits us to say, "Jesus is Lord!" (1 Cor 12:3).⁴¹ Through the Holy Spirit, the people of God are ennobled, elevated, and taken into the divine life.⁴² By the power of the Holy Spirit and their response of faith, the people of God "become members of the body of Christ of the new creation . . . [and] gain a share in the divine life."⁴³ The result of this gift of faith, through the Spirit in the church to receive and transmit the deposit of faith—divine revelation—effectively and faithfully to new cultures and contexts.⁴⁴

http://www.vatican.va/archive/hist_councils/ii_vatican_council/documents/ vat-ii_const_19651118_dei-verbum_en.html.

^{40.} Heinrich Fries, *Fundamental Theology* (Washington: Catholic University of America, 1996) 182.

^{41.} K. H. Neufeld "Pneumatology," in Handbook of Catholic Theology 533-35, at 534.

Michael Welker, "The Holy Spirit," in *The Oxford Handbook of Systematic Theology*, ed. John Webster, Kathryn Tanner, and Iain Torrance (Oxford: Oxford University, 2007) 236– 48, at 241.

^{43.} Ibid.

^{44.} Rush, Eyes of Faith 2.

The sensus fidelium is given to all the faithful.⁴⁵ That is why it is sometimes referred to as the ecclesial collective faith awareness, a "connatural, prethematic sens-itivity to what being Christian truly means."46 This collective "faith awareness" or, as Herbert Vorgrimler calls it, "faith-consciousness,"47 possessed by all the faithful enables them to understand the truth of faith under the influence of the Holy Spirit (LG no. 12). The sensus fidelium/faith awareness helps the church recognize Christ's voice (Jn 10:4) and be able to distinguish Christ from the Antichrist and truth from heresy (1 Jn 2:18– 23; 4:1–6). It enables the church to discern what is compatible with the faith and what is not, using Scripture and tradition as its benchmark (1 Cor 2:10-16). The sensus fidelium is the active sense forever on the lookout for God and God's self-gift through Christ in the Spirit, by whom the faithful experience revelation and come to know intimately both the realities of which church doctrine speaks and what the sacraments celebrate.⁴⁸ The sensus fidelium prompts individuals and communities of faith (a parish or diocese, for example) to be aware of the ecclesial collective "faith-consciousness" and to "sense" with the universal church. Through the sensus fidelium the symbiotic relationship and conspiratio between pastors and the faithful are realized.

The gift of the *sensus fidelium* helps the faithful adhere unfailingly to the truth of the gospel, penetrate it more deeply, and apply it more fully in daily life. It is an instrument for the discernment of what is and is not congruent with the kingdom of God revealed by Christ. That is why the *sensus fidelium* could be interpreted as the "sense *of* the faith of the faithful" and as the "sense *for* the faith of the faithful." As the "sense *for* the faith of the faithful," the *sensus fidelium* is that corporate or ecclesial "*sensus* or organon for the understanding, interpretation and application of revelation."⁴⁹ Understood from this theological trajectory, the *sensus fidelium* becomes that active and corporate instrument at work in the church that enables "the one

^{45.} Some approaches to *sensus fidelium* equate it with the sense of the faith of the laity. These approaches are simplistic in their interpretation of the *sensus fidelium*. The Roman Pontiff, bishops, priests, deacons, religious men and women, and the lay faithful are all included in the *sensus fidelium*. Each of them is among the agents of the *sensus fidelium*, and is involved in the ongoing expression and reception of the *sensus fidelium* in the church. For further insight on this, see Anthony Ekpo, "Canon Law and the Agents of the *Sensus Fidelium*: A Theological and Canonical Exploration," *Canonist* 4.1 (2013) 65–86; and "From *Sensus Fidel to Sensus Legis*: Reconciling Faith and Law in the Church," *Canonist* 4.2 (2013) 157–68. On how the canonical structures in the Church can be used by agents of the *sensus fidelium* for a richer expression and reception of the *sensus fidelium*, see Anthony Ekpo, "The Structures of the *Sensus Fidelium* and Canon Law: Part I," in *Australian eJournal of Theology* 21.1 (2014) 29–48; and "The Otype 21.2 (2014) 94–107.

William M. Thompson, "Sensus Fidelium and Infallibility," American Ecclesiastical Review 167.1 (1973) 450–86, 481.

^{47.} Herbert Vorgrimler, "From Sensus Fidei to Consensus Fidelium," Concilium 180 (1985) 3–11, at 3.

^{48.} Rush, Eyes of Faith 220.

^{49.} Ibid. 241.

church throughout the world to receive revelation faithfully and meaningfully, and then to tradition it effectively" to the next generation of believers.⁵⁰

As for the "sense *of* the faith of the faithful," the *sensus fidelium* is the product or result of the church's critical investigation into what does and does not conform to the kingdom of God. It is the interpretations that are the result of the investigative and interpretative activity of the *sensus fidelium* as "sense *for* the faith of the faithful." In other words, the *sensus fidelium* is "the diverse interpretations of the one faith throughout the world."⁵¹ When this faith interpretation is, on behalf of the whole church, articulated and defined by the magisterium after dialogue with theologians and the people of God, it becomes a *consensus fidelium* or a dogmatic statement.⁵² Viewed from this perspective, the *sensus fidelium* becomes the "sense *of* the faith of the faithful." In other words, it is the corporate or ecclesial "eyes of faith" for the understanding, interpretation, and application of the faith to real life as well as the interpretations that result from the interpretative activity of the ecclesial "eyes of faith."⁵³ These two meanings of the *sensus fidelium* do not stand in contradiction to each other. They are the two sides of the same coin. This essay sees and interprets the *sensus fidelium* in these two senses.

However, even though the whole community is given the gift of understanding and sensing "for" and "of" the faith by the Holy Spirit, the magisterium's oversight is still needed to discern the diversity of interpretations present in the whole community.⁵⁴ The *sensus fidelium* is not a matter of public opinion or polling, a majority vote, or the consensus of the majority. It is rather "a charism of the Holy Spirit moving the church toward truth."⁵⁵ The Holy Spirit is present in the entire people of God, vivifying the *sensus fidelium*, the church's magisterial authority, and theology. The authority of the *sensus fidelium*, therefore, is constituted by its role as a source and test for magisterial proclamation and theological interpretation. Through the *sensus fidelium* God's people are made capable of recognizing God's word for what it is, however it comes to them through God's agents. The *sensus fidelium* helps the faithful cling without fail to the faith of the living tradition and revelation delivered to them through the saints, to penetrate it more deeply by accurate insights, and to apply it more thoroughly to life.

Furthermore, the treatment of the sensus fidelium in LG no. 12 leads to some intratextual and intertextual tensions in the Vatican II documents worth

^{50.} Ibid.

^{51.} Ibid. 243.

^{52.} See Karl Rahner, "What Is a Dogmatic Statement?," in *Later Writings*, Theological Investigations 5 (New York: Seabury, 1975) 42–66, esp. 49, quoted in Rush, *Eyes of Faith* 73–74 n. 39. On the *consensus fidelium, sensus fidei*, and other terms associated with the *sensus fidelium*, such as *sensus theologiae, sensus laicorum, sensus episcoporum*, and *sensus magisterii*, see ibid. 215–90, esp. 247.

^{53.} Rush, Eyes of Faith 247.

^{54.} Ibid. 282.

J. J. Mueller, S.J., et al., *Theological Foundations: Concepts and Methods for Understanding Christian Faith*, rev. and exp. ed. (Winona: Anselm Academic, 2011) 233.

highlighting.⁵⁶ The first intratextual tension shows itself between certain assertions in chapter 2, "On the People of God" (nos. 9–17) and in chapter 3, "On the Hierarchical Constitution of the Church" (nos. 18–29). *LG* no. 12 (in chap. 2) tells us that the whole people of God participates in the *munus propheticum* by virtue of their baptism—and therefore by virtue of the gift of the Spirit received at baptism. But *LG* no. 25 (chap. 3) affirms that the bishops participate in the *munus propheticum* without reference to the participation of the whole people of God mentioned in chapter 2. Similarly, the affirmation of the infallibility of the whole people's belief, highlighted in *LG* no. 12, is not integrated into *LG* no. 25's teaching on the magisterium's infallibility.⁵⁷ Without reading too much into this lack of integration, one might say that the church is divided into two aspects, namely, the *ecclesia docens* and the *ecclesia discens* (the teaching church and the learning church), an understanding that developed especially during the Tridentine era. Avery Dulles asserts:

Beginning with Thomas Stapleton (d. 1598), many theologians divide the Church into components—the "teaching Church" which is hierarchical and the "learning Church" which is predominantly lay. The hierarchy is credited with active infallibility; the infallibility of the "learning Church" is regarded as merely passive. The duty of the faithful, therefore, is simply to accept what the hierarchy tells them. The "sensus fidelium" in this theory ceases to function as a distinct theological source.⁵⁸

The lack of integration in LG poses a hermeneutical problem in the interpretation of the *sensus fidelium* in LG and perpetuates the bipolar understanding of the church

^{56.} By "intratextual tension" I mean the theological inconsistency that arises as a result of the way the relationship of linguistic units (words, phrases, sentences, paragraphs, themes, chapters) within a single conciliar document is structured. By "intertextual tension" I mean the theological inconsistency that arises as a result of the structures of relationship among linguistic units and documents across all 16 conciliar documents and, by extension, the whole tradition of church texts and customs throughout history.

^{57.} Regarding these theological inconsistencies, Rahner notes, "Here an infallibility of faith is attributed to the people of God as a whole, as also to the people of the Church as the recipients of teaching in particular. The Council itself has not attempted to carry this further by relating what it says in these chapters to the statements in chapter III, where it is the hierarchical structure of the Church that is being dealt with" ("The Teaching Office of the Church in the Present-Day Crisis of Authority," in *Theological Investigations*, vol. 12 [New York: Crossroad, 1974] 3–30, at 5 n. 4). Rush argues that this theological inconsistency and lack of integration results from "the re-positioning of paragraphs and indeed of whole chapters in the long re-drafting process" ("The Prophetic Office in the Church: Pneumatological Perspectives on the *Sensus Fidelium*–Theology–Magisterium Relationship," in *When the Magisterium Intervenes: The Magisterium and Theologians in Today's Church*, ed. Richard R. Gaillardetz [Collegeville, MN: Liturgical, 2012] 89–112, at 94.

Avery Dulles, A Church to Believe In: Discipleship and the Dynamics of Freedom (New York: Crossroad, 1982) 112. See also Avery Dulles, "Sensus Fidelium," America 155.12 (1986) 240–42, 263.

as *ecclesia docens* and the *ecclesia discens*. If the church is divided into the *ecclesia docens* and the *ecclesia discens*, then the pneumatic gift of the *sensus fidelium* that is given to all the faithful, which helps them believe indefectibly and teach infallibly, is received and expressed differently by the faithful in the church, depending on whether or not one is a member of the magisterium.⁵⁹ It means that, even though every member of the faithful is believed to be endowed with the pneumatic gift of the *sensus fidelium* by virtue of their baptism, the *sensus fidelium* is in fact the passive capacity by which the faithful endorse what they are taught by the magisterium.⁶⁰

The second tension is the intratextual and intertextual inconsistency of treatment regarding the Holy Spirit's assistance of the whole people of God. LG no. 12 affirms the pneumatic assistance of the whole people of God by the Holy Spirit *in credendo*, and LG no. 25 affirms it of the magisterium *in docendo*. These passages seem to suggest that the gift given by the Spirit to the whole people of God *in credendo* is different from the gift given to the bishops *in docendo*. The gift given to the whole body of the faithful seems to be that of passive obedience to the bishops, even if DV no. 10 uses the word *conspiratio* to highlight the nature of the relationship between bishops and the faithful. This, again, seems to convey an understanding that conceives the church in terms of bipolar division, akin to the model of an *ecclesia docens* and an *ecclesia discens*.

This also creates a hermeneutical problem in the interpretation of the *sensus fidelium* in *LG* no. 12. If one follows the divisive framework of *ecclesia docens* and *ecclesia discerns*, one arrives at the conclusion that the Spirit's gift of the *sensus fidelium* to the whole body of the faithful (*ecclesia discens*) is different from that given to the

^{59.} The term "magisterium" as used here refers to the hierarchical magisterium, the formal teaching authority of the Roman pontiff and the bishops exercised within the broader context of the teaching *munus* of the church and of the people of God as a dynamic communion in the life of grace. The magisterium is basically concerned with the task of teaching and safeguarding the faith within the broader context of the teaching *munus* of the church and is not limited to the official proclamations of the magisterium alone. Rush asserts, "To speak of the teaching office of the church only in terms of the official proclamation, adjudication, and formulation by the hierarchical magisterium is, therefore, reductionistic" (Eves of *Faith* 195). The role of the magisterium is more properly activated when the faith and the divine revelation attested to in Scripture and tradition are in any way endangered by theoretical or practical trends arising outside or inside the church. The magisterium oversees the emergence of the right relation between the community of believers and the content of faith that is prior to it. It ensures proper communication within the church. Alongside Scripture and tradition, and with special attentiveness to the sensus fidelium and theology, the magisterium judges, explains, and proclaims the authentic Christian faith. See Avery Dulles, The Survival of Dogma: Faith, Authority, and Dogma in a Changing World (New York: Image, 1973); Walter Kasper, An Introduction to Christian Faith, trans. V. Green (New York: Paulist, 1980); Richard Lennan, An Introduction to Catholic Theology (New York: Paulist, 1998); Dulles, A Church to Believe In; and Gregory Baum, Faith and Doctrine: A Contemporary View (New York: Paramus, 1969).

Edmund J. Dobbin, "Sensus Fidelium Reconsidered," New Theology Review 2 (1989) 48– 64, at 51.

bishops (*ecclesia docens*). This means that the *sensus fidelium* is not the corporate sense of faith given to all the faithful to ensure that the whole body of the faithful, the church, does not err in matters of faith and morals.

The third tension is the treatment of the *sensus fidelium*, only within the context of the *munus propheticum* without incorporating the whole *tria munera* rubric. The *triplex munus* rubric, while it is found throughout *LG*, is used as a clear structuring principle for chapter 2, "On the People of God," as well as for chapters 3 and 4, which deal with what is common to all the baptized and what distinguishes the ordained and the laity.⁶¹ Chapter 2 asserts that just as Christ was empowered by the Spirit and, like certain Old Testament figures, was anointed priest, prophet, and king, so too all the faithful—bishops and laity alike—by virtue of their baptism and confirmation are empowered by the Holy Spirit to participate in the offices of Jesus Christ as priest, prophet, and king.

The *sensus fidelium* is the spiritual capacity that enables the faithful to participate practically in the *triplex munus* of Christ as priest, prophet, and king. To affirm this spiritual capacity in the lives of the faithful only within the context and confines of *munus propheticum*, as *LG* no. 12 has done, is to deny the dynamic relationship of Christ's three offices. While the offices are unique, they overlap; it is one and the same Christ who acts as prophet, rules as king of kings, and offers sacrifice as the eternal high priest. A creative synthesis is therefore needed in the understanding of the *sensus fidelium* in connection with the *triplex munus*. I now turn my attention to this synthesis.

A New Synthesis: The Sensus Fidelium and the Threefold Office

Christ's *triplex munus* in the church—the prophetic/teaching, priestly/sanctifying, and kingly/governing offices—while three are also one, as there is but one Lord and Savior, who is always at one and the same time priest, prophet, and king without division or confusion. Nothing intrinsic to his prophetic office necessarily leads to confusion with or separation from his kingly and priestly offices. In his whole life, from birth—the incarnation—until death on Calvary and beyond, Jesus is the prophet (teacher, revealer), priest (sanctifier, intercessor), and king (shepherd/Lord) for humankind. Lother Ulrich remarks:

Thus no office can ever be assigned exclusively to one "phase" of Jesus' life. Just as the office of Jesus Christ cannot be divided temporally, so too they cannot be separated from one another. They copenetrate one another and are complementary aspects of the one mystery of salvation in Christ, which is based on the incarnation, realized in the life and crucifixion of Christ, and eternalized in the resurrection.⁶²

Too much emphasis on one *munus* to the exclusion of the others risks a distorting circumscription and misinterpretation of Christ's *triplex munus* in the Church.

^{61.} Rush, "Offices of Christ" 146.

^{62.} Lothar Ulrich, "Offices of Jesus Christ" 512.

As Walter Kasper notes, the same Spirit that is involved in the life, ministry, death, and resurrection of Jesus Christ also helps all believers remember clearly and distinctly the whole Christ event and enables them to participate in and make sense of it in every generation.⁶³ This coheres with K. H. Neufeld's postulate, quoting Karl Rahner: "We must come to Christology from a general Pneumatology."⁶⁴ Indeed, the Gospel accounts of Jesus' life, death, and resurrection arose from this Pneumatology-to-Christology movement. They are accounts of the memories of eyewitnesses who, guided by the Spirit, tried to make sense of his message and ministry, and apply his words and actions to their own lives.⁶⁵ In other words, the four Gospels are presentations of the "faith image" of the pre-Easter and post-Easter Jesus, an image reinterpreted by the Evangelists in accord with their *sensus fidei.*⁶⁶ The Evangelists were able to do this under the inspiration of the Holy Spirit, who helped them remember all that Christ had taught them (Jn 15:14–16, 26–27; 16:12–15; 17:20–23).

The *triplex munus* is pneumatologically grounded and sustained. The mission of the Christ—the Word of God—in the economy of salvation depends on the mission of the Spirit, and vice versa. The Spirit also enables the human response to Christ—the Word in the church. As Francis Schüssler Fiorenza puts it, "The Spirit, as God's Spirit and not as human spirit, creates the church by creating the possibility of human response in freedom."⁶⁷ The Spirit is the principle of the faithful's reception of Christ as priest, prophet, and king. Thus "it is the Holy Spirit who enables the church to participate fully in, and effectively exercise, the three offices of Christ. The Holy Spirit enables the church to be a prophetic, priestly, and kingly people."⁶⁸ Without the Pentecost event, the early church would not have discerned God's action in the life, death, and resurrection of Jesus,⁶⁹ let alone passed on their vision to the next generation of believers.

- 67. Francis Schüssler Fiorenza, *Foundational Theology: Jesus and the Church* (New York: Crossroad, 1985) 103.
- 68. Rush, "The Prophetic Office in the Church" 97.
- 69. Fiorenza, Foundational Theology 103-4.

^{63.} Walter Kasper, "The Renewal of Pneumatology in Contemporary Catholic Life and Theology: Towards a Rapprochement between East and West," in *That They May All Be One: The Call to Unity* (London: Burns & Oates, 2004) 101.

^{64.} Neufeld, "Pneumatology" 538.

^{65.} Even if some of those who experienced the risen Lord (Paul, for example) were not eyewitnesses of his ministry per se, they had direct contact with them; their witness was not distanced by a long period of anonymous transmission of the traditions. See Richard Bauckham, Jesus and the Eyewitnesses: The Gospels as Eyewitness Testimony (Grand Rapids, MI: Eerdmans, 2006) 6; John P. Galvin, "Jesus Christ," in Systematic Theology: Roman Catholic Perspectives, ed. Francis Schüssler Fiorenza and John P. Galvin (Minneapolis: Fortress, 1984) 281; and Helmut H. Koester, "One Jesus and Four Primitive Gospels," Harvard Theological Review 61 (1968) 203–47, at 247.

^{66.} Norman Perrin, "Jesus and the Theology of the New Testament," *The Journal of Religion* 64 (1984); *Rediscovering the Teaching of Jesus: New Testament Library* (London: SCM, 1967). See also V. A. Harvey, *The Historian and the Believer* (New York: Macmillan Publishing Co., 1966).

The spiritual and practical instrument with which the church and her faithful discern, make sense of, and share in the Christ event is the Holy Spirit's gift of the *sensus fidelium*. Through this gift believers remember their encounters with Christ, as the Holy Spirit is the living memory of the church.⁷⁰ The *sensus fidelium* is a manifestation of "the living Spirit of the living community."⁷¹ It guarantees the church's infallibility in teaching and believing.

Further, if the three offices of Christ overlap, it means that the *sensus fidelium*, the pneumatic gift that enables the faithful to share in these offices, should not be interpreted as a pneumatic gift operative only within the context of the prophetic or teaching office. For instance, a bishop by baptism receives the sensus fidelium and participates in the teaching office of Christ and the church. One visible sign of his participation in the teaching office is that bishop's active involvement in teaching and encouraging obedience of the faithful of his diocese to the authentic faith of the Catholic Church. In doing this, the bishop's governing power is also implicated. When he teaches, he teaches as the bishop of the diocese and as one duty-bound to safeguard the faith of the diocese, which implies that he is also carrying out his governing function/office. When he teaches, he should teach in both word and deed. In other words, he should become a living witness to the gospel, eliciting "a readiness in the hearers likewise to commit themselves existentially to the word of God and to make the word a reality by their faith, with the help of grace."72 In carrying out his teaching and governing functions/offices in the manner explained above, the bishop also carries out his priestly or sanctifying office because this office involves adoration of and thanksgiving to Christ, which are expressions of faith. Understood from this theological trajectory, it is impossible to compartmentalize how the faithful share in the threefold office of Christ, because they are mutually inclusive. Teaching (prophetic office), leadership (governing office), and prayer (sanctifying office), all involve faith and putting it into action. The sensus fidelium is about faith in action. This is where the sensus fidelium and the tria munera converge. Therefore, the sensus fidelium cannot be viewed only within the framework of the prophetic office.

Conclusion

I conclude with one observation. The "spirit" and "letter" of Vatican II are two hermeneutical categories now used by theologians in the ongoing interpretation and reception of the teachings of the Second Vatican Council. The "spirit" of Vatican II refers to "the mind of the council, what emerged from all the speeches, written submissions, drafting,

On the Holy Spirit as "the living memory of the Church," see Hans Küng, *The Church Maintained in Truth: A Theological Meditation* (London: SCM, 1980) 19–32. See also Rush, *Eyes of Faith* 37–87.

^{71.} Clodovis Boff, *Theology and Praxis: Epistemological Foundations* (Maryknoll, NY: Orbis, 1987) 136.

^{72.} Werner Löser, "Witness," in Handbook of Catholic Theology 739.

and voting, as the final intention of the assembled bishops as a single conciliar body."⁷³ The "letter" of Vatican II refers to "the final form of the 16 documents through which they expressed their common mind."⁷⁴ These 16 documents do not present systematic and methodical treatises. A hermeneutical problem arises when interpreting and/or discerning the council's "spirit" and "letter" on many issues; this is certainly true for its teaching on the *sensus fidelium* and its connection with the *tria munera*. What emerged in the documents is a juxtaposition of different theological positions that calls for a creative synthesis.⁷⁵ According to Hermann Pottmeyer, this synthesis "is a task the Council sets for the church and for theologians; it is a task of reception, which is far from being a merely passive process."⁷⁶

What I have proposed in this essay is an interpretation of the *sensus fidelium* that extends beyond the narrow framework of prophetic office to a more expansive vision of the *tria munera*. Interpreting the *sensus fidelium* in this broader context of the three-fold office will help bring to light the unity of identity that all the faithful share in Christ and provide useful insights into the relationship between the hierarchy and the faithful vis-à-vis the *sensus fidelium*, an issue many theologians have grappled with over the years. My article calls for a development of new habits of thought and action, new patterns of behavior, and a constant rethinking of who we are in Christ, the eternal priest, prophet, and king.

Author biography

Anthony Ekpo received his PhD in systematic theology from Australian Catholic University and is now pastoral assistant to the archbishop of Brisbane and associate pastor at the Cathedral of Saint Stephen. Specializing in systematic theology, ecclesiology, Pneumatology, sacraments, Vatican II, the *sensus fidelium*, and canon law, he has recently published *The Breath of the Spirit in the Church: The Sensus Fidelium and Canon Law* (2014); "From *Sensus Fidei* to *Sensus Legis*: Reconciling Faith and Law in the Church," *Canonist* 4.2 (2013); "The Structures of the *Sensus Fidelium* and Canon Law: Part I"; and "The Structures of the *Sensus Fidelium* and Canon Law: Part II," *Australian eJournal of Theology* 21.1 and 21.2 (2014). In progress are a book entitled *Canon Law and the Theology of the Spirit: Toward a Pneumatology of Canon Law*, and an article entitled "From Amnesia to Anamnesis: The *Sensus Fidei* and the Eucharist."

^{73.} Rush, "Prophetic Office in the Church" 91.

^{74.} Ibid.

^{75.} See Ormond Rush, *Still Interpreting Vatican II: Some Hermeneutical Principles* (New York: Paulist, 2004) 27–43, 42, 49.

Hermann J. Pottmeyer, "A New Phase in the Reception of Vatican II: Twenty Years of Interpretation of the Council," in *The Reception of Vatican II*, ed. Giuseppe Alberigo, Jean Pierre Jossua, and Joseph A. Komonchak, trans. Matthew J. O'Connell (Washington: Catholic University of America, 1987) 27–43, at 39.