Phases, Case and Accessibility: the case of extraction from DP in Spanish[*]

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0. Introduction

In their work on the Accessibility Hierarchy, Keenan & Comrie (1977) have shown how *wh*-extraction can be conditioned by the case or grammatical relation of the extracted constituent. In Tagalog (Austronesian), for example, only constituents specified as topics can be *wh*-questioned, clefted or relativized, an observation originally due to Keenan (1976). This is shown in the Tagalog examples in (1) from Guilfoyle et. al. (1992). Concretely, in examples (1b) and (1c) the agent cannot undergo wh-extraction because a different argument of the verb is specified as a topic.

(1) TAGALOG (Guilfoyle et. al. 1992)

    a. *Sino ang   bumili   ng damit   para sa bata'?*
       who COMP Agent-Topic-bought ACC-dress for   OBL-child

    b. **Sino   ang   binili   para sa bata   ang damit?*
        who COMP Theme-Topic-bought for   OBL-child TOP-dress

    c. * *Sino ang   bumili   ng damit angbata'?*
       who COMP Benefactive-Topic-bought   ACC-dress TOP-child

The correlation between case/grammatical relation and extractability can perhaps be seen at its clearest in the fact that passivization is a typical strategy used to override this restriction. In the Toba Batak (Malayo-Polynesian) examples in (2), the *patient* DO cannot be extracted for relative clause formation in the presence of an *agent* subject (2b). Instead, passivization of the relative clause must take place to make the *patient* accessible for extraction.

(2)   TOBA BATAK (Keenan & Comrie 1977:68-69)

   a.   *boru-boru na   manussi abit   i*
      woman   that wash   clothes   the
      'The woman who is washing the clothes.'

   b.   **abit   na   manussi boru-boru   i.*
      clothes   that wash   woman   the
      ('The clothes that the woman is washing.')

   c.   *abit   na   nisussi ni boru-boru   i.*
      clothes   that washed by woman   the
      'The clothes that were washed by the woman.'

Lastly, Keenan & Comrie's work also shows that in some languages wh-extraction of certain constituents is not possible at all. Yoruba, for example, disallows extraction of IOs and obliques (though not genitives) altogether in relative clause formation.

The idea that I would like to develop in this paper is that extraction from nominal expressions in Spanish is not unlike the Accessibility phenomena described in Keenan and Comrie's work. The facts concerning extraction from DP in Spanish and other Romance languages are well known. As described for Spanish in Demonte (1987) and Campos (1988), when a derived nominal has two genitive arguments introduced by the preposition *de*, 'of', the *agent* argument of a noun can be extracted, as shown in (3b). The *theme* argument, however, cannot be extracted when the *agent* is present, as can be seen in (3c). Instead, the *theme* argument of a noun can only be extracted when there is no other genitive argument, as shown in (3d). Lastly, a non-genitive argument can never undergo extraction, as shown in (4b).

(3) a.   *Perdiste* [*la   traducción   de Juan de La Odisea*].
     you-lost   the translation   of Juan of The Odyssey
     'You lost Juan's translation of The Odyssey.'

  b.   *De quién*$_i$ *perdiste*   [*la   traducción* t$_i$ *de La Odisea*]?
     of who   you-lost   the translation   of The Odyssey
     'Whose translation of the Odyssey did you lose?'

  c.   **De qué*$_i$ *perdiste* [*la traducción de Juan* t$_i$]?
     of what   you-lost   the translation of Juan
     ('What did you lose Juan's translation of?')

  d.   *De qué*$_i$ *solicitaste*   [*la   traducción* t$_i$]?
     of what   you-asked-for   the translation
     'What did you ask for the translation of?'

(4) a. *Estudian* [*el miedo a   los animales*]
   they study the fear to the animals
   'They study the fear of animals'

 b. **A qué*$_i$ *estudian* [*el miedo* t$_i$]?
   to what they-study the fear

  Although there are numerous analyses of extraction from nominal expressions in Spanish and other Romance languages (Cinque 1980, Demonte 1987, Campos 1988, Giorgi & Longobardi 1991, Valois 1991), in this paper I will propose an alternative analysis that follows Keenan & Comrie's observation that *wh*-extraction can be conditioned by the case of the extracted constituent. Concretely, I will propose that the effects observed in (3) and (4) result from the fact that DP in Spanish is a specific kind of extraction domain, which I will refer to as a Case-opaque domain. This is a domain whose specifier combines the properties of A-bar positions as escape hatches for extraction and of A-positions as positions where Case is licensed. The crucial characteristics of this analysis will be the assumption that derivations proceed by Phases, as suggested in Chomsky (2000), and a head movement analysis of the head of the functional projection immediately subjacent to DP.

1. DP as a Case-opaque domain
  Chomsky (2000) suggests that derivations proceed by Phases, a Phase defined as in (5).

(5) ***Phases (CP and *v*P)***
  Given HP [α [H β]] β is the *domain* of H and α (a hierarchy of one or
  more Specs) is it *edge.*

  Phases are subject to the *Phase-impenetrability condition*, defined in (6), which only allows constituents in the specifier of the Phase projection to be accessible to operations outside the Phase. Concretely, the Phase-impenetrability Condition rules out a movement operation like (7):

(6) *Phase-impenetrability condition*
  In phase α with head H, the domain of H is not accessible to operations
  outside α, but only H and its edge.

              (Chomsky 2000)

(7) * [$_{CP}$ *wh*$_i$ … [$_{CP}$ … . [$_{XP}$ t$_i$ …]]].

  In order for the head of the matrix CP to attract the *wh*-operator, the operator must move through the specifier of the lower CP Phase, since the specifier of the Phase is the only position that is accessible for operations outside the phase. In a nutshell, the primary function of the concept of Phase is to disallow non-cyclic long extraction altogether.
  The notion of Phase raises the question of what happens when the head of YP, YP the phrase immediately subjacent to the Phase, undergoes movement to the head position of the Phase. Clearly enough, if the head of YP bears a strong Case feature, this feature will be checked before movement of the head Y, as in T-to-C movement in English.

(8) a. $[_{XP}$ Y_i $[_{YP}$ t_i]].
    b. $[_{CP}$ $[_{TP}$ John will read what]].
    c. $[_{CP}$ what$_i$ will $[_{TP}$ John read t_i]]?

I would like to propose, however, that when the head of YP bears a weak Case feature, then movement of any constituent to the specifier of the Phase will be conditioned by the possibility of this constituent to check the Case feature of Y. I will henceforth refer to this configuration as a **Case-opaque Domain**. This name is intended to convey the fact that extraction from this domain displays opacity effects with respect to Case.

(9)   CASE-OPAQUE DOMAIN
   XP= Phase, Y adjoins to X, Y bears a weak Case feature; movement through
   Spec-XP now depends on the possibility of checking the Case feature of Y.
 $[_{XP}$ Y_i+X $\ldots$ $[_{YP}$ t_i $\ldots$]].

A Case-opaque Domain can be thought of as a maximal projection whose specifier simultaneously combines the properties of A-bar positions as escape hatches for extraction and of A-positions as positions where Case is licensed. The proposal I will develop from here onwards is that if DP is taken to be a Phase, then a straightforward account of the extraction facts in (3-4) can be arrived at by analyzing DP as a Case-opaque domain.

2. DP structure

My basic assumptions regarding the structure of nominal expressions are the following. In order to account for the linear order of the noun with respect to its arguments schematized in (10), I assume the analyses where the external argument of the noun in generated in Spec-NP and the noun moves to the head position of a functional projection (FP) above NP (Cinque 1994, Bernstein 1991, Valois 1991):

(10)   a.   *la traducción de Juan de La Odisea.*
        the translation of   Juan of The Odyssey
        'Juan's translation of The Odyssey.'

    b.
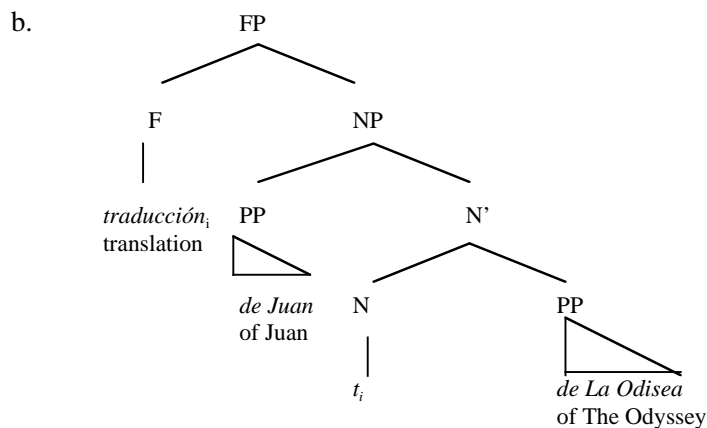
I also assume, following Siloni's (1997) analysis of the construct state construction in Hebrew, that an AgrGenitive phrase where genitive case is licensed is immediately subjacent to DP, as in (11a). The structure assumed for Spanish nominal expressions is accordingly the one in (11b).

(11) a. HEBREW (construct state)

$[_{DP}$ harisat$_i$ $[_{AgrGen}$ha-cava$_j$ t$_i$ $[_{NP}$ t$_j$ t$_i$ 'et ha-'ir]]]
destruction   the-army   ACC the city
'The army's destruction of the city'   (Siloni 1997)

b. Spanish DP

$[_{DP}$ . . . $[_{AgrGenP}$ . . . . $[_{FP}$ . . . $[_{NP}$ ....]]]].

Lastly, my assumptions on feature checking and Case licensing are those that follow from the dichotomy between weak and strong features developed in Chomsky (1995), and not those in Chomsky (2000). From this latter paper, only the notion of Phase is adopted here.

2.2 Prenominal possessives

As a way of introducing the analysis, it is useful to start by looking at prenominal possessives in deverbal nouns. As is well-know, Spanish like other languages has a series of prenominal possessives that can correspond to the external argument of the noun, as in (12a). The possessive can also correspond to the noun's internal argument when the external argument is not present or when it is expressed as a non-genitive oblique, as in (12b).

(12) a. ***su** análisis de la situación.*
his analysis of the situation
'His analysis of the situation.'

b. ***su** análisis* (*por parte de Juan*)
its analysis (by part   of Juan)
'Its(=the situation's) analysis (by Juan).'

McCloskey (1998) suggests that prenominal possessives in Italian can be analysed as the head of an agreement projection immediately subjacent to DP. This head can be analyzed as further being in agreement with an argument of the noun realized as a null category (see also McCloskey & Hale (1984) for Irish, Rivero (1986) for Spanish). Following McCloskey's proposal, I suggest that Spanish prenominal possessives can be analysed as the head of the AgrGen projection and that movement of this head to adjoin to a null D results in the structure in (13).

(13)

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                        DP
                  _____|_____
                 D            AgrGenP
              ___|___      _____|_____
             ø    suᵢ    AgrGen        FP
                  his      |        ____|____
                          tᵢ       F          NP
                                   |       ___|___
                              análisis ₖ  SPEC      N'
                              analysis    |      ___|___
                                          e      N      PP
                                      [AGENT]     |      /\
                                                 tₖ   de la situación
                                                      of the situation
                                                        [THEME]
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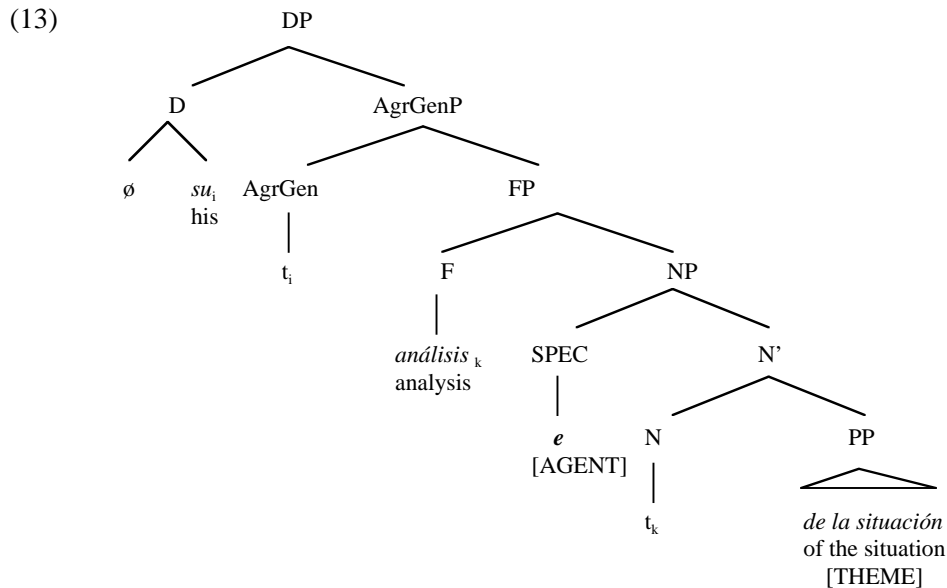
Two different facts provide support for this analysis of prenominal possessives in Spanish. The first one is that co-occurrence of a determiner and a pronominal possessive was observed in 17th century literary Spanish (Bello & Cuervo 1881, Kany 1951), as in example (14). This pattern is still attested in some varieties of South American Spanish (Kany 1951), as in the examples in (15) and (16).

(14)   *Cantareis   la mi muerte cada día.*
       you-shall-sing the my death each day
       'You shall sing my death every day.'   (Bello & Cuervo 1881: 230)

(15)   *una mi hermana*
       a   my   sister
       'a sister of mine'

(16)   *esas tus   cosas*
       those your things
       'those things of yours'   (Kany 1951: 43)

Secondly, analyzing Spanish prenominal possessives as determiners (Brucart 1987) is problematic because the phi-features of the possessive do not necessarily correspond to the phi-features of the nominal expression as a whole. In example (17) the possessive bears a [2nd person] phi feature, but the nominal expression as a whole is 3rd person.[1]

(17)   [_DP *tu   descripción   de aquellos terrenos*]
             your description   of those   lots
       'Your description of those lots.'

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[1] I am indebted to Judith Aissen for bringing this point to my attention.

With respect to this analysis of prenominal possessives, I further assume that AgrGen bears a weak genitive Case feature ([GEN]). All else being equal, this Case feature will be checked at LF by feature movement from the genitive argument of the noun closest to AgrGen, both when this argument is realized as an overt genitive PP and when it is realized as the null category in (13). Finally, I also assume that in constructions like (10a), where there is no prenominal possessive, a null AgrGen head adjoins to an overt determiner. More specifically, I assume that this null AgrGen head differs form the overt counterpart (the prenominal possessive) in that has no phi-features, but they both still bear the weak genitive Case feature.

3. The Analysis

Up to this point, I have suggested that DP in Spanish can be characterized as a Case-opaque domain. The main consequences of this proposal are the following. First, since DP is a Phase, a constituent extracted from it must now move through Spec-DP. This is a welcome result, since now the well known fact that movement out of a nominal expression must proceed through Spec-DP (Torrego 1985, Stowell 1989, *inter alia*) need not be stipulated. Rather, it follows directly from the Phase-impenetrability Condition. Secondly, since AgrGen moves to adjoin to D, extraction is now conditioned by the possibility of checking the genitive Case feature of AgrGen. As will be discussed in what follows the main advantage of this is that the extraction facts in (3) can now be shown to follow directly form the Minimal Link Condition of Chomsky (1995), reproduced in (18). For the purpose of this analysis it is enough to assume that closeness reduces to c-command, so β will be closer to K than α if β asymmetrically c-commands α.

(18) *Minimal Link Condition*
   K attracts α only if there is no β, β closer to K than α, such that K attracts β.
   (where K is a sublabel (i.e. a feature) of some head)

(Chomsky 1995)

The purpose of the Minimal Link Condition is to ensure that a head attracts the closest constituent that could check it features, but it is crucial to note that it also rules out derivations which involve an indirect violation of this locality condition. That is, if K attracts α such that α is the closest element to K that could check some feature F1 of K, but in doing so α also checks a feature F2 which could be checked by some β closer to K than α, this still counts as a violation of the Minimal Link Condition and the resulting derivation is ruled out. Chomsky (1995) suggests that this characteristic of the Minimal Link Condition is what rules out SuperRaising, schematized in (19).

(19) **SuperRaising** (following Chomsky 1995)

   a.   seems [$_{CP}$ that it was told John [$_{CP}$ that IP]].
   b.   *John seems [$_{CP}$ that it was told *t* [$_{CP}$ that IP]].

In (19a), the [NOM] Case feature of the expletive 'it' has already been checked by the intermediate I^0 and is no longer accessible to any operation since the structural Case features

of nominals are uninterpretable. Because of this, the only constituent that could check the [NOM] Case feature of matrix I^0 is 'the DP 'John'. In fact, all else being equal, raising of *John* to matrix Spec-IP actually makes the derivation converge, since *John* can check not only the [NOM] Case feature of matrix I^0, but also its D-feature and its phi-features. What rules out this potential case of SuperRaising is instead the Minimal Link Condition. When movement of *John* in (19b) checks the D-feature and phi-features of matrix I^0, a violation of the Minimal Link Condition is incurred in, since the closest constituent that could potentially check these features is the expletive 'it'[2], even if *John* is the only constituent that could check the Case feature of matrix I^0. This property of the Minimal Link Condition will play a crucial role in the analysis of extraction from DP, to which we now turn. The basic extraction pattern is repeated in (20), where a genitive *agent* can be extracted in the presence of a genitive *theme*.

(20)　　*De quién*$_i$ *perdiste*　[*la traducción* t$_i$ *de La Odisea*]?
　　　　of who you-lost　the translation　of The Odyssey
　　　　'Whose translation of the Odyssey did you lose?'

In order to analyze this example, I further assume that D can bear a [wh] feature which attracts the *wh*-genitive phrase. The relevant step of the derivation is schematized in (21), where the genitive PP corresponding to the *agent* has moved to substitute for [Spec, D] in order to check D's [wh] feature.

(21)　　*perdiste*　[$_{DP}$ *De quién*$_i$ *la* [　*traducción* t$_i$　*de La Odisea*]]
　　　　you-lost　　of who the　　translation　of the Odyssey

Recall now the analysis presented in the previous section. Since null AgrGen has adjoined to the determiner before movement of the wh-operator, the operator simultaneously checks the genitive Case feature of AgrGen. The derivation proceeds, and after C^0 [wh] is merged with TP, the genitive wh-operator moves from [Spec, D] to substitute for [Spec, C], yielding the SpellOut structure in (20). Consider now the case where extraction of the *theme* argument results in ungrammaticality.

(22)　　*De qué$_i$　*perdiste*　[*la traducción de Juan* t$_i$]?
　　　　　of what　you-lost　the translation of Juan
　　　　　('What did you lose Juan's translation of?')

The crucial step where the derivation goes wrong is schematized in (23), where the genitive *theme* has substituted for [Spec, D]. Here we to see the effects of the DP phase as a Case opaque-Domain. The genitive PP corresponding to the *theme* has moved to check the [wh] feature of D, and in doing so it has simultaneously checked the genitive Case feature of AgrGen, since the genitive *theme* is now in a Spec-head relation with AgrGen. But this brings with it a violation of the Minimal Link Condition. When the *theme* genitive PP is extracted, the Minimal Link Condition is violated, since it is not the closest genitive PP that can check the [GEN] feature of AgrGen. Rather, it is the *agent* genitive PP, which asymmetrically

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[2] The [D] feature and the phi-features of 'it', as opposed to its Case feature, are still accessible for further syntactic operations, given that the categorial and phi-features of nominal are interpretable.

c-commands the *theme* genitive PP, is the constituent closest to D that could potentially check this feature. This example is in effect almost identical to the SuperRaising example discussed in (19). It is important to notice that the *theme* genitive PP is the only constituent that can check the [wh] feature of D, so D can attract no other constituent to check this feature. But by doing so the Minimal Link Condition is violated with respect to the feature [GEN], so the derivation is ruled out.

(23)
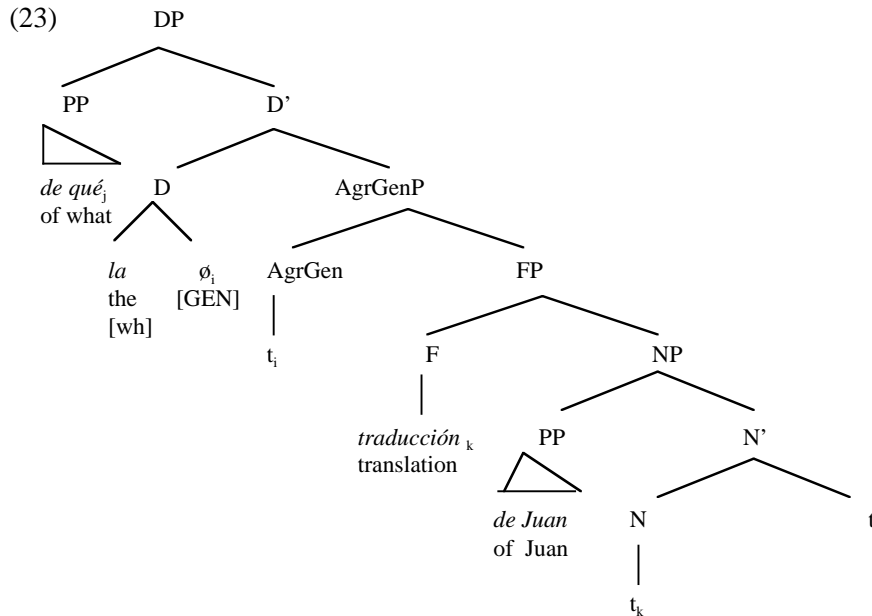
Next, recall that extraction of the *theme* is not possible either when the *agent* argument is cross-referenced by a prenominal possessive. In this case, following the assumptions laid out in the previous section, the null agent in Spec-NP is still the genitive argument closest to AgrGen that can check AgrGen's [GEN] Case feature. The relevant step in the derivation is schematized in (25).

(24) *De qué$_i$ perdiste [*su traducción* t$_i$]?
          of what   you-lost his translation
        ('What did you lose his (i.e. Juan's) translation of?')

(25) *perdiste*   [$_{DP}$ *De qué$_i$*   *su* [*traducción* [$_{NP}$ **e**   t$_i$]]
                              THEME   AGENT
        you-lost   of what his   translation

Consider now the case where extraction of the *theme* is possible when there is no *agent*, as in (26).

(26)   *De qué$_i$ solicitaste*   [$_{DP}$ *la* [*traducción* t$_i$]]?
         of what you-asked-for   the   translation
         'What did you ask for the translation of?'

I would like to argue that the most straightforward analysis of these cases is one where we take the DP in (26) to be the "passive" form of the derived nominal. Active/passive alternations in derived nominals have been widely observed in the literature (Cinque 1980, Giorgi & Longobardi 1991, *inter alia*). As exemplified in (27b), in the passive form of the noun the only genitive argument corresponds to the *theme*, and the *agent* can optionally be realized as a non-genitive oblique.

(27)   a. *el análisis de Juan de la situación*
         the analysis of Juan of the situation
         'Juan's analysis of the situation'

       b. *el análisis de la situación por parte de Juan.*
          the analysis of the situation by part of Juan
          'The analysis of the situation (by Juan).'

Note that incorporating the passive analysis of derived nominals is going to be necessary in any case, because as noted by Cinque (1980), Giorgi & Longobardi (1991) and others, some derived nominal are inherently passive. In other words, they do not allow its external argument to be realized as a genitive PP.

(28)   a. *la captura de Juan* (*por la policía*)
         the capture of Juan by the police
         'Juan's (*theme*) capture by the police.'

       b. **la captura de la policía de Juan*
          the capture of the police of Juan
                   AGENT   THEME
         ('The police's (*agent*) capture of Juan (*theme*).')

(29)   a. *la absorción de calcio por los huesos.*
         the absorption of calcium by the bones
         'The absorption of calcium by the bones.'

       b. ** la absorción de los huesos de calcio.*
          the absorption of the bones of calcium
                     AGENT   THEME
         ('The bones' absorption of calcium.')

If we take (26) to correspond to the passive form of the noun *traducción* 'translation', the analysis is unproblematic. The *theme* argument of the passive nominal moves to substitute for the specifier of the DP phase, and simultaneously checks the [wh] feature of D and the [GEN] feature of AgrGen; there is no violation of the Minimal Link Condition, since there is no other argument that could potentially check the [GEN] feature. The relevant step of the derivation is schematized in (30).

(30) *solicitaste*   [$_{DP}$ *de qué*$_i$ *la* [*traducción* [$_{NP}$ t$_i$]]
                    THEME
     you-asked-for   of   what   the   translation

Analyses based on the passive form of the noun for cases like (26), however, have been rejected for Italian by Giorgi & Longobardi (1991) and for French by Valois (1991) on the grounds that a purpose clause can appear in the nominal expression even when the only genitive argument of the noun is the *theme*, as in (31a). They further note that extraction in these cases can co-occur with a purpose clause, as shown in (31b):

(31) a. [*La destitución*   *de Juan* [*para* PRO *satisfacer*   *al*   *sindicato*]] *fue*
         the impeachment of   Juan   for   to-satisfy   ACC-the   union   was
         completamente   *inevitable*.
         completely   unavoidable
         'The impeachment of Juan to please the union was completely unavoidable.'

    b. *De quién*$_i$ *va*   *a*   *ser necesaria*   [*la destitución*   t$_i$ [*para* PRO
         of   who   it-goes   to   be   necessary   the impeachment   for
         satisfacer   *al*   *sindicato*]]?
         to-satisfy   ACC-the   union
         'Who's impeachment is going to be necessary to please the union?'

The argument put forth by Giorgi & Longobardi (1991) and Valois (1991) is that the presence of a purpose clause indicates the presence of the null *agent* PRO in NP that controls the PRO subject of the purpose clause. Under the assumption I have adopted here that null arguments of the noun still bear a [GEN] feature, it would appear that examples like (31b) would be problematic for my proposal. The reason is that the null genitive *agent* would still be the genitive argument closest to AgrGen that could potentially check its Case feature, so it should not be possible to extract the *theme* in this case either. However, I will now present evidence against the argument developed in Giorgi & Longobardi (1991) and Valois (1991), which will in turn support the analysis of constructions like (26) as corresponding to the passive form of the derived nominal. Crucially, notice that the examples in (32) clearly show that the presence of a purpose clause does not necessarily imply the presence of a PRO in Spec-NP, since the purpose clause occurs with what is clearly the passive form of the noun, where the *theme* is the only genitive argument of the noun and the *agent* is realized as an oblique.

(32) a.   *Fue necesaria*   [*la destitución*   *de Juan* [*por parte de la mesa directiva*]
          it-was necessary the impeachment of Juan   by   part   of the board executive
          [*para* PRO *satisfacer*   *al sindicato*]].
          for   to-please   to-the union
          'Juan's impeachment by the executive board was necessary to please
          the union.'

b. *Se aprobó*   [*la   traducción de este libro* [*por parte de la academia*]
   CL   was-approved the   translation of this book   by   part   of the academy
   [*para* PRO *hacerlo   más accesible   al   público*]].
   for   to-make-it   more accessible   to-the   public
   'The translation of this book by the Academy to make it more accessible to
   the public was approved.'

This fact points to the conclusion that Control of PRO in a purpose clause in a nominal expression is an instance of Event Control, as originally argued for by Williams (1985). Following one of Williams' arguments, this becomes even clearer when interpretive properties of these constructions are taken into account. In (31a), for example, what 'pleased the union' was 'Juan's impeachment', not the *agent* of 'impeachment'. Accordingly, there is neither syntactic nor interpretive evidence in favor of the existence of a null *agent* in constructions of this kind.

Finally, recall the impossibility of extraction of a non-genitive oblique.

(33) a. *Estudian*   [$_{DP}$ *el miedo a   los animales*].
          they-study   the fear to the animals
          'They study the fear of animals'

      b. **A qué*$_i$ *estudian*   [$_{DP}$ *el   miedo* t$_i$]?
          to what   they-study   the fear
          (What do you study (the) fear of?)

The ungrammaticality of (33b) cannot be explained as the result of a violation of the Minimal Link Condition, since the extracted constituent is not a genitive PP and thus does not check the genitive Case feature of AgrGen. Instead here we see the essence of the Case-opaque Domain at work: since the zero-level projection of the head of the phase bears an unchecked [GEN], the ungrammaticality of (33b) can now be analyzed as the result of a feature clash (Rizzi 1990, Chomsky 1995) between the [GEN] feature of AgrGen and the Case feature of the oblique PP (presumably [ACC]) when it moves to check the [wh] feature of D. The relevant step of the derivation is shown in (34).

(34)   *estudian* [$_{DP}$ *a qué*$_j$ *el*+ø$_i$ [$_{AgrGenP}$ t$_i$ [*miedo* t$_j$]]]
        they-study   to what   the+AgrGen   fear

4.   Back to Accessibility

Up to this point, I have suggested how the notion of Case-opaque Domain can provide a straightforward account of extraction from DP in Spanish. Before concluding this paper, I will briefly consider the application of this kind of analysis in the clausal (instead of the nominal) domain, where the observations on Accessibility were first recorded.

The analysis I suggest has the potential to provide an account for some of the Accessibility phenomena in Keenan & Comrie (1977), along the same lines of the analysis of Spanish developed here. As mentioned briefly in section 1, a Case-opaque Domain can arise at the clausal level iff; a) the head of the phrase immediately subjacent to CP bears a weak

Case feature, and; b) this head moves to adjoin to C. Consider for example the case of a language where only nominative (or absolutive, in ergative-absolutive languages) operators can be *wh*-extracted. This can now be understood as a case where the head of the phrase immediately subjacent to CP (say T) bears a weak nominative feature, and further moves to adjoin to C, either as a result of *wh*-movement or because of an independent feature checking requirement. The crucial issue to keep in mind in testing the predictions of this analysis is that neither T-to-C movement nor the presence of a weak Case feature in T create by themselves a Case-opaque Domain. English has T-to-C movement, but since the Case feature of T is strong, it is checked before T-to-C movement and so the relevant configuration does not arise. In Spanish, on the other hand, the nominative feature of T is presumably weak (since Spanish allows for post-verbal subjects). However, in this language the verb never moves beyond T, as is well known (see Suñer 1994), so again there is no Case-opaque domain at the clause level in this case either. Further considerations that need to be addressed include, for example, whether the category [TOPIC] can be characterized as a form of Case in those languages where only topics can be subject to *wh*-extraction, as in the Tagalog examples in (1). All of these are issues that require further investigation.

5. Conclusions

In this paper, I have suggested that movement of a functional head bearing a weak Case feature to adjoin to the head of a Phase projection results in a specific kind of extraction domain, a Case-opaque domain. Extraction from this domain is conditioned by the possibility of the extracted constituent to check the Case feature of the adjoined functional head. I have argued that if DP is analyzed as a phase, the facts related to extraction from DP in Spanish can be understood as the result of DP being precisely this kind of extraction domain. Concretely, I have proposed that movement of the head of a Genitive Agreement Phrase bearing a weak [GENITIVE] feature to adjoin to D makes DP a Case-opaque domain in Spanish. The impossibility of extracting a *theme* genitive argument of the noun in the presence of an *agent* can now be understood as the result of a violation of the Minimal Link Condition. The resulting account is in essence the same as the account for the impossibility of SuperRaising in Chomsky (1995). Finally, non-genitive arguments of the noun cannot be extracted because a feature clash results between the [GENITIVE] Case feature of AgrGen adjoined to D and the Case feature of the non-genitive PP when it moves through the specifier of the DP Phase.

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