

Introduction

It should have been a mere formality. In 2006, Steve Elturk, president of the Islamic Organization of North America, planned to convert an existing office building in Warren, Michigan, into a mosque and education center, but he first had to obtain a variance from the city's zoning board of appeals. What should have been a relatively straightforward process dragged on for months as city officials manufactured a multitude of reasons to deny Elturk's request. At a series of planning commission public hearings in March and April, standing-room-only crowds gathered to voice their opposition to the proposed center. Their objections ranged from complaints about noise and traffic to more amorphous concerns about how the mosque would affect the character of the neighborhood. One irate resident even went so far as to issue a warning that worship at the mosque would include animal sacrifice. Sharing their constituents' concerns, the planning commissioners delayed voting on Elturk's application for as long as they could, until they were finally forced to relent under threat of litigation and a U.S. Justice Department investigation. Even then, they attached one final condition to their approval. Elturk would receive the requested variance only if he agreed never to install a loudspeaker or other amplificatory device to the building for the purpose of broadcasting the Islamic call to prayer. Elturk had never expressed any intention of doing so, but the city officials went out of their way to make clear that they would not put up with any noise.¹

Three years later, Bishop Rick Painter, of Phoenix's Christ the King Liturgical Charismatic Church (CKC), almost went to prison for ringing church bells. In June 2009, a Phoenix municipal court sentenced Painter to ten days in jail and three years' probation for violating the city's anti-noise ordinance (the sentence was suspended pending appeal). Neighbors had complained after Painter's church installed an electronic carillon system that rang every half hour from 7:00 a.m. to 9:00 p.m., every day of the week. A belligerent Painter refused to back down, insisting that this amplificatory technology

was essential for fulfilling his church's mission. "CKC rings carillon bells to honor and glorify God," he explained in documents submitted to the court. "CKC believes that ringing the carillon is a way of acknowledging God's sovereignty over time and all that exists. CKC also rings the carillon as a way of evangelizing by notifying anyone nearby that the Church is there and is a place of hope, help, and prayer." Painter's adversaries heard the carillon system very differently, however. For them, bell ringing was not only unnecessary for religion, properly conceived, but was ultimately a sign of bad faith. "I can't imagine that God in heaven would look down and say that's a good thing to do to your neighbors," one of the complainants argued. "We all celebrate God," added another, "but we don't disturb our neighbors doing it."²

The Warren and Phoenix disputes, which involved different religious communities engaged in different kinds of auditory practices, were resolved in different ways and through different types of legal procedures. Yet in each case, unwilling listeners protested that they should not have to put up with the sounds of religion practiced out loud. Disgruntled neighbors insisted that religious freedom did not entail a right to make noise. And these cases were far from isolated incidents. In fact, it has been surprisingly common throughout U.S. history for American audiences to celebrate enthusiastically the right to worship as one pleased even while complaining virulently about having to hear religious reverberations echoing throughout the public realm. Perhaps even more than architecture, imagery, dress, and other forms of visual display, Americans have perceived sound as dangerously porous and transgressive, spilling over and across imagined boundaries between public and private, between self and other, and among discrete religious communities in ways that have often felt uncontrollable and uncontainable. In response, these unwilling listeners have insisted again and again on their own right to be left alone. Noise has regularly marked the limit of what neighbors have been willing to tolerate. The call of religion out loud has moved many Americans not to pray, but to complain.

This book listens to Americans complain about religion as noise. It analyzes the politics of religious pluralism in the United States by attending to disputes about religious sound in the public realm. Church bells and prayer calls, the thunderous bellows of street-corner preachers and the amplified sounds of enthusiastic devotion—each of these auditory outbursts has generated controversy and elicited complaint at various moments in U.S. history. As they have emanated outwards from the more traditional spaces to which modern religion has been confined, these sonic expressions have reached multiple, heterogeneous audiences—both intended and unintended, willing and unwilling—who have heard and responded to them in very different

ways. And through these differences, they have given voice to much broader debates about religion and its proper place in American society.³

Noise may seem like a relatively insignificant issue, at least as compared to the kinds of topics that often occupy scholarship on religion and American public life. Noise rarely appears in historical inquiries into how religious voices have shaped public policy or how religious actors have contributed to broader social movements, such as abolitionism or civil rights. It does not directly implicate fundamental questions about the origins and beginnings of human life, whom one has the right to marry, or how one ought to die. It is not obviously related to the practice of religion in America's schools or prisons or about the extent to which limited public dollars should flow to religious institutions. Indeed, few social problems might seem as mundane or trivial as noise, so unexceptionally annoying and commonplace.

Yet precisely for that reason, these relatively mundane disputes offer a surprisingly productive site for exploring competitions over public power, social order, and legitimacy in American society and for analyzing the concrete mechanisms through which Americans have managed their religious differences. They offer an important vehicle for investigating how religion's boundaries have been carefully regulated throughout U.S. history, both overtly through punitive legal measures and more tacitly through widely shared social norms. Although seemingly unimportant, these cases raise much broader questions about American religious identity, the meaning and limits of religious freedom, and, indeed, the nature of religion itself. Through their varied responses to sounds deemed religious, the participants in these disputes have contested not just *whether* religion should make itself heard publicly in the United States, as if religion was a singular kind of "thing," but *how* and *in what manner* it should do so. They have fought over what it means to be properly religious in America and, more broadly, what it means to be American, religiously speaking. Above all, they have debated who might enjoy a right to be heard in public and who should be expected to keep quiet.⁴

Noise has proven useful for this project of negotiating religion's boundaries in the United States precisely because its meaning has seemed so indeterminate. On the one hand, complaints about noise have expressed genuine concerns about volume and decibel level. Excessively loud sounds can disrupt conversations, interrupt sleep, and inflict other physiological harms, such as hearing loss, headaches, nausea, and fatigue. While loud sounds have always disturbed human communities, especially in densely populated urban centers, the problems associated with them have become particularly pronounced in the last century as new technologies, such as electro-acoustic

amplifiers and airplane engines, have offered new opportunities for “aural aggression.” Understood in this way, religion has become noise when religionists have practiced their faith too loudly, their sounds regarded as no different from the more “profane” sonic disturbances that emanate from any other source. Religion has become noise, in this sense, when its sonic expressions have seemed “really” annoying.⁵

Noise has more typically been interpreted as a subjective category, however, defined simply as “unwanted sounds.” And sounds have annoyed because they have been too loud but also because of who has made them and in what context. Noise complaints have targeted unwanted noisemakers as much as unwanted noises. As emerging scholarship in sound studies has by now well established, noise has a history, and its construction has been shaped at least as much by social and cultural factors as by anything inherent to sounds themselves. The differentiation of harmonious sounds from deleterious ones has depended at least as much on who is listening and to whom they are listening as on the particular tone or quality of a given acoustic vibration. In fact, dominant groups have most typically used noise complaints to demarcate outsiders to the community, to marginalize others, and to restrain dissent. They have used noise complaints to assert control over urban spaces, to delimit proper forms of behavior and expression, and to regulate who and what can be heard in public. “Noises are informed by the sounds, languages, and social position of others,” the art historian Douglas Kahn writes. “It is only because certain types of people are outside any representation of social harmony that their speech and other sounds associated with them are considered to be noise.” Sound studies scholarship has been particularly attuned to noise as an index of racial, ethnic, and class differences, but we might apply its insights to the study of religion as well. We can hear how complaints about religion as noise, understood in this way, have expressed underlying assumptions about what makes particular religious communities “unwanted.” As the cultural historian Hillel Schwartz aptly puts it, “Noise is never so much a question of the intensity of sound as of the intensity of relationships.”⁶

In a similar vein, the cultural historian Peter Bailey has suggested that noise might best be defined as “sound out of place,” echoing the anthropologist Mary Douglas’s famous definition of dirt as “matter out of place.” Sounds become noise, that is, when they are heard as contravening an assumed social order, when they are heard as not belonging, when they are heard where they are not supposed to be. A cough in a library might sound louder than a horn at a busy intersection, for example. Or the Islamic call to prayer might sound perfectly “normal” on the streets of Cairo or Istanbul, yet be

heard as unwanted noise in Warren, Michigan. When noise is interpreted in this way, we might say that religion has become noise at various moments in U.S. history not because its sounds were perceived as *not* different from the other aural annoyances of modern life, but precisely because they *were* thought to be different. Religion became noise, that is, when its sounds were heard where they were not expected or where they were not supposed to be. Religion became noise when its sounds spilled across the normative boundaries meant to keep it contained. Religion became noise when it sounded “out of place.” The project of distinguishing harmonious religion from cacophonous noise, in other words, has depended not only on the social identities of noisemakers and their audiences, but on a host of underlying assumptions about where religion properly belongs. Through disputes about religious sound, Americans have contested the proper place of religion and religious adherents in U.S. spatial and social order. Complaining about religion as noise has offered a valuable strategy both for demarcating the place of particular religious groups and for circumscribing religion’s place, more generally, in American public life.⁷

Most commonly, as noted above, noise complaints have targeted those perceived as outsiders to the dominant community, thereby functioning to marginalize others and restrain dissent. As the religious historian Leigh Schmidt has proposed, noise has functioned throughout U.S. history “as a social category as much as an aesthetic one,” as a cultural marker of alterity. “The other is loud, discordant,” Schmidt succinctly states. Indeed, nineteenth-century liberal-minded critics regularly complained about the aural intensity of evangelical revivals during the Second Great Awakening. Victorian Protestant elites complained about Catholic immigrants, African Americans, the Salvation Army, and the poor, all of whom they held responsible for the unbearable cacophony of industrial cities. Twentieth-century mainline Protestants complained about Jehovah’s Witnesses, Pentecostals, ISKCON (Hare Krishnas), and others who insisted on spreading their faith as loudly and aggressively as they could. And in recent decades, many Christian Americans have complained about the incidental noises associated with new mosques and temples, using zoning laws to block the construction of non-Christian houses of worship. In each of these cases, religious, racial, ethnic, and class-based distinctions could not be neatly disentangled. Instead, noise demarcated difference more generally, threats to a dominant social order that had to be carefully contained. Sensory values expressed social hierarchies, and cacophony signaled social chaos. Noise marked the limit of what could be tolerated.⁸

Yet it is not only the sounds of religious dissenters that have been silenced. In fact, noise regulation has proven useful not only for demarcating the place

of particular religious groups, but also for policing the boundaries of religion more generally. It has functioned as part of a broader liberal project to refashion and legitimate distinctly modern modes of public piety. Complaints about religion as noise have tended to be informed by particular liberal Protestant and post-Enlightenment notions of “good” religion. Noisy religion, religion practiced publicly and out loud, has stood in contrast to more acceptable modes of piety, conceived as individualized, internalized, and intellectualized. Noisy religion has been criticized for placing too much emphasis on material form rather than substantive content. It has been considered the sign of an immature faith, overly concerned with external behavior rather than interiorized commitment and insufficiently respectful of the rights of others. “Religion does not unite itself to show and noise,” the American revolutionary and intellectual Thomas Paine once wrote in an essay criticizing church bells. “True religion is without either.”⁹

By delegitimizing in this way the need for auditory mediation, complainants in these sound disputes have worked to construct religion itself as “other” to a public realm that they imagined as properly secular. By legislating noisy religion out of public places—places such as street corners and city parks that traditionally have been identified as the archetypal arenas for democratic discourse and deliberation—complainants have aimed to make those spaces “safe” from religious intrusion. Recall, for example, how CKC’s neighbors in the 2009 Phoenix church bells case affirmed the value of religious worship, yet maintained that the sounds of such devotion should not disturb the surrounding neighborhood. In a religiously diverse society, such an arrangement was often imagined as most conducive to promoting civic harmony. Channeling religion into a narrowly circumscribed private realm would protect differences in belief while rendering them increasingly irrelevant. Yet in so doing, complaints about religion as noise have also helped to structure secular spaces according to distinctly Protestant norms.

This claim supports a growing body of critical scholarship that has analyzed secularism not as a universal or neutral solution to the problem of religious difference but as a culturally specific mode of governance, which, at least in its American configuration, has been implicitly shaped by unstated Protestant religious assumptions. Following the foundational work of the anthropologist Talal Asad, this interpretive approach has called for close attention to the particular institutions, structures, and discourses through which modern religion (and its twin, the modern secular) has been carefully produced and regulated. Rather than take the category of religion for granted, it has interrogated the particular historical processes through which religion was constructed and the particular political and strategic ends to which it has been deployed.¹⁰

Among other findings, this literature has emphasized the ways that the project of defining religion has often functioned to discipline religious subjects in accordance with the needs of the liberal state. The religious studies scholar Robert Orsi, for example, has argued that nineteenth-century American scholars of religion worked to authorize as “civilized” or “modern” those religious forms that they regarded as most conducive to producing virtuous democratic citizens. They pursued this project by constructing an analytical vocabulary that demarcated “unacceptable forms of religious behavior and emotion,” or what Orsi described as “a scientific nomenclature of containment.” “Good” religion, their scholarship suggested, was unobtrusive, unemotional, and restrained, a “domesticated modern civic Protestantism.” Good religion would support, rather than threaten, the American democratic experiment.¹¹

Law also offered an important site for this project of disciplining and containing religion. As we will learn, U.S. courts have regularly interpreted the category of religion in ways that have functioned to domesticate religious enthusiasm and restrain religious dissent. In cases pertaining to religious noise, for example, they have tended to regard sound as merely incidental or peripheral to religion, properly conceived, rather than as an essential medium through which religious beliefs are constituted and materialized. In so doing, these court cases have served to encourage alternative forms of piety that can more readily be kept quiet. Law has functioned, therefore, not simply as a neutral arbiter among different religious communities, but as a critical site at which modern notions of suitable religiosity have been constructed, contested, and ultimately legitimated. Legal institutions have constructed particular conditions of possibility according to which American religions could be recognized, tolerated, and protected. They have placed powerful constraints on *how* religion has been able to make itself heard in public, regularly privileging certain ways of being religious over others while ensuring that religion would happen only in those times and spaces authorized by the state. These sonic controversies are thus part of a history of American religion that has been characterized not only by unbounded freedom, creativity, and improvisation, but also by real legal and social constraints, which have served to carefully circumscribe the space in which religion has been able to be performed.¹²

This liberal project of containment has never been finally accomplished, however, for the situation on the ground always has proven more complicated than its idealized rhetoric has allowed. Liberal theory and legal regulation have not always been able to keep religion quiet. Religious individuals and groups have insisted on making themselves heard. As the religious

studies scholar Randall Styers notes, “Religion is far too unwieldy for easy containment, in theory or in practice.” The domestication of religion has remained always a work in progress, requiring ongoing maintenance and policing of boundaries. It has faced repeated challenges from religious noise-makers who have implicitly advanced alternative understandings of religion and its place in the modern world. By insisting on their right to practice religion out loud, they have contested liberal notions of religion as properly private, believed, and internalized. They have pushed back against the powerful structural forces that have constrained U.S. religious life. They have used public sounds to claim a place of their own in American society.¹³

Most significantly, they have done this not by reshaping public policy in accordance with their own beliefs, but by making space for alternative modes of public practice. Scholarship on religion and public life has typically focused on whether religiously based arguments have a legitimate place in democratic politics and legislative decision making. This literature has tended to interpret religious pluralism as essentially a problem of how to reconcile or mediate among competing truth claims and metaphysical commitments, an approach that risks reducing religions to intellectual abstractions, treating them all as more or less the same kind of thing, differentiated only by the substantive content of their creedal statements. The sound disputes considered here make evident, however, that religions have entered the public realm in very different ways. Religious adherents have materialized their beliefs through different sensory forms, and these differences have mattered, for they have elicited different kinds of responses. Recall, for example, how residents of Warren, Michigan, interpreted the visual display of a mosque as distinct from the auditory broadcast of its call to prayer. Or consider how street-corner preachers have typically attracted the attention of passersby at least as much on account of their fiery style as on account of anything distinctive about their particular message. *How* preachers have engaged their audiences, that is, has seemed at least as important as *what* they have had to say.¹⁴

By centering a particular mode of sensory contact, then, by placing sound at the center of our concern, this book underscores the ways that religions have differed from each other not only in their substantive content but in their material forms and styles of practice. It takes seriously the ways that Americans have responded to other religions not as intellectual abstractions but as particular sets of embodied practices and material investments. It emphasizes that debates about religion and public life have always been as much about different ways of using body and space as about different modes of public reasoning, as much about *how* religious adherents have made

themselves heard as about *whether* they should do so—and that religious dissent, therefore, has always been as much about style as substance.¹⁵

This book follows recent scholarship on religious media, which has interpreted form, structure, and style as lying at the heart of religion, rather than as secondary to matters such as substantive content, personal experience, and inward belief. It also joins important conversations across the humanities about the role of the senses in constructing modern culture. Over the past thirty years, historians, anthropologists, geographers, and others have examined the material practices of everyday life as part of a growing effort to ground the study of culture in concrete phenomena, rather than in the abstract realm of ideas. This scholarly turn has included increased attention to the cultural values and social ideologies expressed through different ways of sensing the world, challenging overly idealized accounts that focus exclusively on cognitive ways of being. These works have disrupted a once standard narrative that identified vision as the preeminent sense of the modern West, prized by Enlightenment rationalists for its association with detached objectivity, knowledge, and illumination. Instead, scholars have begun to recapture the multisensorial modes through which modernity was constituted.¹⁶

Religious studies scholarship has contributed to these conversations in important ways, as evidenced by the growing number of works devoted to the religious sensorium. Visual culture has attracted the most sustained attention and has been analyzed in the most sophisticated ways, though there have been fine studies of sound and the other senses as well. These works have tended to concentrate on how the senses function within bounded religious communities. That is, they have focused their interpretive energies on the meaning of these multisensorial practices for those who engage in them and for their intended audiences. This book, by contrast, encourages scholars to pay more attention to how the sights, sounds, and smells of religious difference have been received and responded to by others as they have crossed social and geographic boundaries. It emphasizes how frequently sound has mediated contact and generated conflict throughout U.S. history and asks why this particular sense has seemed so distinctly conducive to public controversy.¹⁷

At the same time, my attention to sound is meant neither to diminish the importance of sight nor to suggest that the two stand in mutual opposition. In fact, the senses cannot be so easily segregated, especially in the case of religion. Consider, for example, how members of the International Society for Krishna Consciousness have tended to distinguish themselves not only by the sound of their chanting, but also by the sight of their bright orange

robes and characteristically shaved heads and by the tastes and smells of the Indian spiced food that they distribute as *prasadam* (food offerings to the gods). “It was kind of like a mystic experience,” one convert described his first experience of an ISKCON communal meal, “with the smells and sights and everything.” Or consider how women have been arrested at the Western Wall in Jerusalem both for reading out loud from the Torah and for wearing *tallitot* (ritual prayer shawls traditionally worn by Jewish men), thereby violating religious and state regulations governing what could appropriately be seen *and* heard in a place of worship.¹⁸

Rather than argue for the uniqueness of sound, then, this book aims more broadly to experiment with a new model for narrating U.S. religious history that centers a particular medium of contact, rather than bounded, discrete traditions, and then maps the complicated and contentious negotiations that ensue. By listening in on disputes about public sound, this book investigates religious pluralism not as an abstract intellectual debate aimed at resolving theological differences but as a concrete and emotionally charged matter of determining how much noise Americans should have to tolerate in their neighborhoods or deciding to what—and to *whom*—one should have to give ear in public places. It attends to the structural constraints that have shaped U.S. religious life while also underscoring how religious adherents have insistently pushed back against them—how sound has repeatedly spilled over and across the normative boundaries meant to keep religion contained.¹⁹

Finally, these aural contests also reveal that those who have sought to keep religion quiet have been able to sustain their commitment to this project only by turning a deaf ear to the continued sonic presence of certain religious forms and not others. If these public disputes have been informed by distinctly modern assumptions about good or proper religion, in other words, then they also make clear, to paraphrase Bruno Latour, that American Protestantism has never been as “modern” as we might have presumed. Despite forswearing the need for auditory forms of mediation, Protestant Christianity also has often been practiced out loud, yet typically in ways that have gone unnoticed or conveniently ignored. Its sonic expressions have tended to fade to the background, taken for granted even as they, too, have contributed to the acoustic construction of American public space. Despite their pervasive presence, they rarely have been heard as threatening the supposed secularity of those spaces. They rarely have been heard as “out of place.” The American public realm has thus always proven more open to certain kinds of religious interventions than others, and we can learn much about the contested nature of American religious identity by attending closely both to those sounds that have elicited complaint *and* to those that have not. Making noise without

censure, that is, has long constituted as much an exercise of power as enforcing silence on others.²⁰

Consider, for example, U.S. Supreme Court Justice Hugo Black's nostalgic evocation of church bells in a 1952 dissenting opinion. "Under our system of religious freedom," Black wrote, "people have gone to their religious sanctuaries not because they feared the law but because they loved their God. The choice of all has been as free as the choice of those who answered the call to worship moved only by the music of the old Sunday morning church bells." For Black, church bells did not constitute unwanted noise or an unnecessary "external," secondary and extraneous to religion, properly conceived. Instead, bells epitomized the very promise of American religious liberty and its attendant notion of religious voluntarism. Bells announced the right of all Americans to worship as they pleased, provided they could do so within the confines of their "religious sanctuaries." Black's account made church bells seem thoroughly ordinary and unremarkable, unobjectionable precisely because they were so commonplace, so taken for granted. Yet imagine the very different effect of Black's words had he written instead, "The choice of all has been as free as the choice of those who answered the call to worship moved only by the voice of the Friday afternoon *muezzin*." What different conception of American religious identity might such a statement have implied, and what can we learn from the fact that a vast majority of Black's intended audience would presumably have found such a claim unintelligible? What does this say about the public realm's openness to different forms of auditory religious expression?²¹

At the same time, not even church bells have always managed to avoid controversy. In 1915, for example, one New York City resident complained vociferously about the clash of competing chimes emanating from nearby churches. "Why should a Quaker be wakened by a Roman Catholic bell," she asked, "or a Presbyterian by an Episcopal bell, or a Methodist by a Baptist bell? If church-bells could be so constructed that they would be guaranteed to waken only the members of the church in which they are hung, they could be tolerated, but so long as they continue to arouse believers in opposing faiths, our non-sectarian laws ought to be strong enough to silence them." Unlike Justice Black, this speaker did not interpret church bells as a sentimentalized signal of religious liberty, but as an intolerable acoustic annoyance, their competing chimes making audible the clamorous cacophony of sectarian division and religious competition. The law should have protected her right to quiet, she proposed. Religious freedom should have entailed a right to be left alone.²²

As these scattered fragments suggest, not even the all-too-familiar sound of church bells has been heard in the same way throughout U.S. history.

There is an important history here, a history of religion out loud, which this book aims to recover. By attending to the different ways that different sounds have been perceived at different historical moments, we can trace the particular conditions of possibility that have governed how religions have been able to make themselves heard publicly in the United States. By taking note of which sounds have attracted attention and which have gone unnoticed, we can map some of the broader societal forces, legal mechanisms, and tacit assumptions that have shaped how American religion has been both carefully regulated and exuberantly performed. By attending to disputes about religious sounds in the public realm, we can gain entry into much broader debates about religion and its proper place in American society.

I structure this historical narrative around three particular case studies, each of which exemplifies broader shifts in the overlapping histories of religion, sound, and U.S. law. These cases emerged at critical moments when new technologies, new populations, and new regulatory structures were creating new conditions of possibility for practicing religion out loud. They also feature different configurations of the complicated relationship between sound, space, and public power. The book's shorter, odd-numbered chapters (1, 3, and 5) locate each case study within a broader historical and theoretical framework while the longer, even-numbered chapters (2, 4, and 6) offer more sustained description and analysis.

Part 1 listens to the sounds of power by attending to the changing perception of church bells in nineteenth-century America. In cities transformed by industrialization and immigration, Protestant churches discovered that they could no longer take for granted their long-presumed right to make noise. At the same time, they also found it increasingly difficult to safeguard the peace and quiet of the Sabbath day. In chapter 1, I trace how these shifts offered important occasions for working out the unsettled boundaries between religious and civic authority in a rapidly changing nation. In chapter 2, I analyze a particular 1877 dispute that resulted in a Philadelphia court carefully regulating the ringing of bells at a fashionable Episcopalian church. I explore how the different responses to these disputed bells expressed different assumptions about how Protestant churches would retain their moral authority in postbellum American cities. The court's eventual decision signaled a subtle shift in Protestantism's position that would anticipate broader changes in American religious life, yet it did so in a way that reaffirmed and reinforced Protestant Christianity's broader cultural influence.

Part 2 turns from the sounds of power to the sounds of dissent by considering how groups such as the Salvation Army and the Jehovah's Witnesses, who took to the streets to loudly spread their respective messages, challenged

a liberal legal framework that expected religious adherents to practice civility and self-restraint. It explores how these religious dissenters pushed back against the limits imposed by U.S. law, challenging the state to accommodate diverse styles of public practice and performance. In chapter 3, I trace the shifts in the social, legal, and auditory landscapes that distinguished the Jehovah's Witness cases of the 1940s from the Salvation Army cases of the late nineteenth century. In particular, the introduction of loudspeakers and other modes of electronic amplification during the first decades of the twentieth century gave rise to new mechanisms for regulating noise that had surprising implications for religious life. This transpired at the same time as courts began applying the First Amendment against actions by the states, in addition to the federal government, thereby dramatically expanding the scope of protection for religious free exercise. These countervailing trends came to a head in *Saia v. New York*, a 1948 Jehovah's Witness case that called on the U.S. Supreme Court to consider for the first time whether religious freedom might entail a right to make noise. In chapter 4, I analyze how the parties to the *Saia* case interpreted the Witnesses' use of "sound cars" in very different ways. Underlying these differences, I propose, were contrasting understandings of the relationship between religion, media, and technology and, indeed, contrasting understandings of religion itself. These differences were not merely academic, but instead had important regulatory implications, which revealed the Witnesses' legal victory to be far more tenuous than it at first appeared. This was because the Court's decision affirmed the Witnesses' right to use sound cars, but it did not affirm their right to practice what I describe as "sound car religion." Its logic reinforced the notion that the concrete forms through which the Witnesses materialized their beliefs were secondary to the substance of those beliefs. As in the church bell disputes of the late nineteenth century, the *Saia* case resulted in public religion that was carefully regulated and pressured to keep quiet.

Finally, Part 3 considers the sounds of religious difference by attending more directly to how auditory practices have mediated religious contact in an increasingly heterogeneous social context. It explores how the public and plural nature of American religion today has given rise to occasions both for remapping and reinscribing the boundaries of collective identity. In chapter 5, I trace important shifts in First Amendment jurisprudence following the *Saia* decision as U.S. courts sought consistent guidelines for regulating religion and noise. This history reveals how illusory the ideal of "neutrality" proved to be, as courts continued to privilege certain ways of being religious over others, a trend with important implications for the rights of religious minorities and newcomers. In chapter 6, I attend more closely to

the dynamics of religious pluralism in the contemporary United States by examining a contentious 2004 dispute about the Islamic call to prayer in Hamtramck, Michigan, which centered on a city council's surprising decision to accommodate its Muslim petitioners. Through their varied responses to the prayer call, Hamtramck residents expressed competing conceptions of how religious differences were best managed in a secular society. Yet their rhetorical positions had unintended effects and unexpected consequences, which led to several surprising tensions and ironies. In particular, I unpack a fundamental paradox at the heart of this case study, namely, that those who appealed to secularism in order to keep religion quiet actually made religious differences more audible, while those who appealed to pluralism in order to celebrate American religious variety risked effacing differences altogether. This meant that Muslims were ultimately able to make themselves heard in Hamtramck, but only if they did so in carefully prescribed ways.

Our narrative thus moves from considering how the long taken-for-granted sound of church bells suddenly became perceived as noise in late-nineteenth-century American cities to analyzing how the relatively unfamiliar sound of the Islamic call to prayer was made to seem "at home" in Hamtramck, Michigan, in 2004. Unlike the 1877 church bells dispute or the 1948 *Saia* loudspeaker case, however, the Hamtramck controversy never made it into a U.S. courtroom. As we will see, it was resolved through other legal mechanisms instead. In fact, it has only been in relatively exceptional situations that Americans have turned to law to resolve their disagreements about noise, whether religious or not. More typically, they have responded to unwanted sounds in more mundane fashion, by grumbling to their spouses and children, perhaps, or by shoving pillows over their heads. They have asked their neighbors to tone it down a bit, or they have learned to put up with more noise than they might have thought possible. They have often complained without litigating, that is, arriving instead at more pragmatic strategies for managing their differences. Tuning into these kinds of sonic conflicts, therefore, invites us to imagine religious toleration less as an abstract political theory than as a social practice of everyday life, engaged in on a regular basis by friends, neighbors, and strangers as they go about their daily lives.

As such, I have drawn on a wide range of sources in analyzing the disputes at the center of this book. When possible, I have relied not only on written legal records but also on personal interviews, ethnographic observation, and other kinds of archival materials, such as personal memoirs, private correspondences, and television news broadcasts. In this way, I have tried to gain a deeper appreciation for the kinds of issues that have animated parties

to these disputes. At the same time, I have found it particularly useful for the purposes of this book to focus on the legal arena as a critical site at which religion's normative boundaries have been constructed, contested, and legitimated. I have found it particularly useful, that is, to attend to those exceptional cases in which Americans *have* turned to courts, municipal councils, and other legislative bodies, for these cases throw into sharpest relief the broader stakes underlying these seemingly inconsequential disputes. They reveal most clearly the wider social norms and cultural assumptions that have tended to inform complaints about religious noise, and they make most evident how Americans have used sonic controversies to contest religion's proper place in American society.

Although I focus on the legal arena, these cases do not only have significance for the study of religion and law. U.S. courts have had a particularly difficult time making sense of sound and the claims advanced by religious sound makers, but the reasons why this is so turn out to have important implications for the study of religion more generally. In the book's conclusion, I work to tease out further some of these broader implications.

Taken together, the disparate case studies considered here reveal the particular conditions of possibility that have governed how religions have been able to make themselves heard publicly in the United States, and they make audible how the varied responses to religion practiced out loud have been shaped by changing social and legal contexts and by broader assumptions about religion's proper place in American life. This story features many familiar themes from the study of U.S. religion, including the conjoined legacies of urbanization, industrialization, and immigration, the impact of technological innovations, and the shifting and contested meanings of secularism, pluralism, and religious freedom, yet it approaches these themes from a new angle of vision or new direction of hearing. By offering a political history of religious sound, then, this book offers a model for "retelling" the history of religion in the United States more generally, one that begins with opening our ears and listening more closely.²³