

## SKEW POLYNOMIAL EXTENSIONS OF COMMUTATIVE NOETHERIAN JACOBSON RINGS

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**ABSTRACT.** The Jacobson condition (i.e., that all prime ideals are semiprimitive) is proved to pass from a commutative noetherian ring  $R$  to a skew polynomial ring  $R[y; \tau, \delta]$ , assuming only that  $\tau$  is an automorphism.

### 1. INTRODUCTION

This note is concerned with the prime ideal structure of a skew polynomial ring  $S = R[y; \tau, \delta]$  over a noetherian ring  $R$  with respect to an automorphism  $\tau$  and a (left)  $\tau$ -derivation  $\delta$  (cf. [7]). An unanswered question in this setting is whether  $S$  must satisfy the Jacobson condition (i.e., every prime ideal is an intersection of primitive ideals) when  $R$  satisfies the same property. Some positive answers are known even for non-noetherian coefficient rings: Watters [15] proved that  $K[y]$  is Jacobson for any Jacobson ring  $K$ , and Irving [9] showed that an iterated skew polynomial extension  $T$  of a commutative Jacobson ring  $K$  is Jacobson if  $K$  is central in  $T$  (see also [12]). On the other hand, examples have been constructed of non-noetherian commutative Jacobson rings  $K$  with skew polynomial extensions  $K[y; \tau, \delta]$  that are not Jacobson; see Pearson and Stephenson [14] for an example in which  $\delta = 0$ , and see Bergen, Montgomery, and Passman [1] or Ferrero and Kishimoto [3] for examples in which  $\tau = 1$ . Within the noetherian context, affirmative answers to the problem were given by Goldie and Michler [4] when  $\delta$  is trivial, and by Jordan [10] when  $\tau$  is the identity.

The aim of this note is to provide an affirmative answer to the above question when  $R$  is commutative noetherian but no restrictions are placed upon  $\tau$  or  $\delta$ . Such a result has remained unavailable despite the thorough analyses of the commutative case by Irving [8] and the first author [5]. Our methods rely in part on the techniques introduced in [6] as well as on the results in [5]. Moreover, it is not assumed that  $R$  be filtered, graded, or affine.

We impose the blanket hypotheses throughout that  $R$  is a commutative noetherian ring, that  $S = R[y; \tau, \delta]$ , and that  $\tau$  is an automorphism of  $R$ . However, commutativity of  $R$  is not needed for (2.2) and (3.1).

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## 2. INDUCED VS. NONINDUCED PRIME IDEALS

Throughout this section we let  $P$  denote an arbitrary prime ideal of  $S$ . If  $A$  is a ring and  $I$  is an ideal of  $A$ , then  $N(I)$  denotes the intersection of all the prime ideals containing  $I$  and  $J(I)$  the intersection of all the right primitive ideals containing  $I$ . The reader is referred to [7, 13] for further explanations of undefined terms.

2.1. By [6, 5.3, 5.5], we may fix a prime ideal  $Q$  of  $R$ , minimal over  $P \cap R$ , that satisfies the following property: If  $A$  denotes the Goldie quotient ring of  $R/Q$ , then  $P$  is the right annihilator in  $S$  of a nonzero  $A$ - $S$ -bimodule factor  $M$  of  $A \otimes_R S$  such that  $M_{S/P}$  is torsionfree. Next, set  $U = S/QS$ , and let  $e$  denote the coset  $1 + QS$ . Observe that we may identify  ${}_R U_S$  with  $(R/Q) \otimes_R S$  by an isomorphism that sends  $e$  to  $1 \otimes 1$ , and under this identification we may view  $(R/Q)U$  as a free left  $(R/Q)$ -module with basis

$$\{1 \otimes 1, 1 \otimes y, 1 \otimes y^2, \dots\}.$$

Also, observe that as a left  $R$ -module,  $A \otimes_R S$  is isomorphic to an Ore localization of  ${}_R U$ .

It follows from the above choice of  $Q$  that  $\text{ann } U_S \subseteq P$ , since  $\text{ann } U_S = \text{ann}(A \otimes_R S)_S$ . Our analysis divides into the two cases determined by whether or not  $P = \text{ann } U_S$ , and we begin with an incomparability result.

2.2. **Lemma.** (Here  $R$  need not be commutative.) Suppose that  $J$  is an ideal of  $S$  properly containing  $P$ . If  $P \neq \text{ann } U_S$ , then  $J \cap R \not\subseteq Q$ .

*Proof.* By [6, 4.6], the set  $\mathcal{E}$  of regular elements of  $R/(P \cap R)$  forms an Ore set (of regular elements of  $S/P$ ) in both  $R/(P \cap R)$  and  $S/P$ , and the ring  $E = (R/(P \cap R))\mathcal{E}^{-1}$  is artinian. Letting  $F = (S/P)\mathcal{E}^{-1}$ , we see that the canonical embedding of  $R/(P \cap R)$  into  $S/P$  extends uniquely to an embedding of  $E$  into  $F$ . Now choose an ideal  $I$  of  $S$  that contains  $P$  and is maximal among those ideals of  $S$  whose intersection with  $R$  lies within  $Q$ . Standard arguments reveal that  $I$  is a prime ideal of  $S$  disjoint from  $\mathcal{E}$ . Consequently, if  $I$  strictly contains  $P$ , then  $I$  extends to a proper nonzero ideal of  $F$  (e.g., [7, 9.22]). Next, it follows from [6, 5.7, 5.8] that  $F_E$  is finitely generated when  $P \neq \text{ann } U_S$ . However, if  $F$  has finite length as a right  $E$ -module, then  $F$  is a simple artinian ring. Therefore,  $I = P$  and the lemma follows.  $\square$

2.3. **Lemma.**  $(P + QS) \cap R = Q$ .

*Proof.* We may assume without loss of generality that  $P \cap R \neq Q$ , and it therefore follows from the minimality of  $Q$  that  $P \cap R$  is not prime. Moreover, it suffices to prove that  $(P + QS) \cap R \subseteq Q$ . Next, by [5, 3.1], either  $P \cap R$  is semiprime or  $R/(P \cap R)$  has a unique associated prime. We first consider the case where  $R/(P \cap R)$  is semiprime, and we let  $Q, Q_2, \dots, Q_n$  be the distinct prime ideals of  $R$  minimal over  $P \cap R$ . Note that  $n \geq 2$  and  $Q_n Q_{n-1} \cdots Q_2 Q \subseteq P \cap R$ . Hence,

$$Q_n Q_{n-1} \cdots Q_2 [(P + QS) \cap R] \subseteq P \cap R \subseteq Q.$$

Since  $Q_n Q_{n-1} \cdots Q_2 \not\subseteq Q$ , it follows that  $(P + QS) \cap R \subseteq Q$  in this case.

Now assume that  $R/(P \cap R)$  has a unique associated prime. Consequently,  $Q$  is the unique prime ideal of  $R$  minimal over  $P \cap R$  and  $\mathcal{E}_R(Q) \subseteq \mathcal{E}_R(P \cap R)$ . Therefore,  $\mathcal{E}_R(Q) \subseteq \mathcal{E}_S(P)$  by [6, 4.6]. Hence, if there exists an element  $c \in (P + QS) \cap (R \setminus Q)$ , then  $c \in \mathcal{E}_S(P)$ . Next observe that there exists a positive integer  $n$  such that  $Q^n \subseteq P \cap R$  while  $Q^{n-1} \not\subseteq P \cap R$ . However, it now follows that  $Q^{n-1}c \subseteq Q^{n-1}(P + QS) \subseteq P$ , in contradiction to the regularity of  $c$  modulo  $P$ . Therefore,  $(P + QS) \cap R \subseteq Q$  and the lemma follows.  $\square$

The proof of the following proposition is adapted from [4, 10].

**2.4. Proposition.** *If  $P \neq \text{ann } U_S$  and  $Q$  is semiprimitive, then  $P$  is semiprimitive.*

*Proof.* For  $t = 0, 1, \dots$  set

$$\begin{aligned} K_t &= \{a \in R \mid e.(ay^t + a_{t-1}y^{t-1} + \dots + a_0) \in UP \text{ for some } a_0, \dots, a_{t-1} \in R\} \\ &= \{a \in R \mid ay^t + a_{t-1}y^{t-1} + \dots + a_0 \in P + QS \text{ for some } a_0, \dots, a_{t-1} \in R\}. \end{aligned}$$

Then let  $K = K_n$ , where  $n$  is the minimum value for  $t$  such that

$$0 \neq e.(a_t y^t + a_{t-1} y^{t-1} + \dots + a_0) \in UP$$

for some  $a_0, \dots, a_t \in R$ . (The existence of  $n$  follows from the assumption that  $P \neq \text{ann } U_S$ .) Note, since  $\tau$  is an automorphism, that  $K$  is an ideal of  $R$  containing  $Q$ , and observe, for  $a \in K$ , that  $a \notin Q$  if and only if  $0 \neq e.(ay^n + a_{n-1}y^{n-1} + \dots + a_0) \in UP$  for some  $a_0, \dots, a_{n-1} \in R$ . In particular,  $K$  properly contains  $Q$ . Moreover, since  $(P + QS) \cap R \subseteq Q$  by (2.3), it follows that  $n \geq 1$ .

Now let  $M$  be a maximal ideal of  $R$  that contains  $Q$ . We claim that either  $J(P) \cap R \subseteq M$  or  $K \subseteq M$ . To prove this claim, assume that  $J(P) \cap R \not\subseteq M$ . Choose  $j \in J(P) \cap R$  such that  $j \notin M$ . There then exist  $m \in M$  and  $b \in R$  such that  $1 = m + jb$ . Since  $jb \in J(P)$ , there exists a polynomial  $f = cy^\ell + c_{\ell-1}y^{\ell-1} + \dots + c_0 \in S$ , with  $c, c_0, \dots, c_{\ell-1} \in R$  and  $c \neq 0$ , such that  $(1 - jb)f = mf \equiv 1 \pmod{P}$ . Hence,  $e.mf \equiv e \pmod{UP}$ . Now choose  $a \in K \setminus Q$ . There then exists a polynomial  $p = ay^n + a_{n-1}y^{n-1} + \dots + a_0 \in S$ , with  $a_0, \dots, a_{n-1} \in R$ , for which  $0 \neq e.p \in UP$ . Assume for the moment that  $\ell \geq n$ , and observe that

$$af - p\tau^{-n}(c)y^{\ell-n}$$

has degree less than  $\ell$ . It now follows from a straightforward induction that  $e.a^k f \equiv e.r \pmod{UP}$  for some nonnegative integer  $k$  and some polynomial  $r \in S$  with degree  $d < n$ . Hence, we have

$$e.a^k m f = m.e.a^k f \equiv m.e.r = e.mr \pmod{UP},$$

and since  $a^k m f \equiv a^k \pmod{P}$ , we see that  $e.a^k \equiv e.mr \pmod{UP}$ . Consequently,  $e.(a^k - mr) \in UP$ . However,  $a^k - mr$  has degree strictly less than  $n$ . Therefore, it follows from the choice of  $n$  that  $e.(a^k - mr) = 0$ . Hence,  $a^k - mr_0 \in Q$ , where  $r_0$  is the constant term of  $r$ . But this last statement implies that  $a^k \in M$ , because  $Q \subseteq M$ . Thus  $a \in M$ , and it therefore follows from the choice of  $a$  that  $K \subseteq M$ . This verifies the claim. Furthermore, it follows from the claim that  $J(P) \cap K \subseteq M$ . Because  $M$  was an arbitrary maximal ideal of  $R$  containing  $Q$ , we now see that  $J(P) \cap K \subseteq J(Q) = Q$ .

But this inclusion means that  $J(P) \cap R \subseteq Q$ , since  $K \not\subseteq Q$ . Thus by (2.2),  $J(P) = P$ , and the lemma is proved.  $\square$

**2.5. Lemma.** *Assume that  $P = \text{ann } U_S$ . Then  $P \cap R$  is  $(\tau, \delta)$ -prime, and  $P = (P \cap R)S = S(P \cap R)$ . Consequently, if  $\tau$  and  $\delta$  also denote their induced actions on  $R/(P \cap R)$ , and  $y$  also denotes its image in  $S/P$ , then  $S/P = (R/(P \cap R))[y; \tau, \delta]$ .*

*Proof.* Set  $I = P \cap R$ . It follows from [6, 5.9ii] that there exists an  $n \in \mathbb{N}$  such that  $\tau^n(Q) = Q$  and such that  $\{Q, \tau(Q), \dots, \tau^{n-1}(Q)\}$  is the set of prime ideals of  $R$  minimal over  $P \cap R$ . In particular,  $N(I)$  is  $\tau$ -stable. Now suppose that  $I = Q$ . Then  $I$  is  $\tau$ -stable and therefore  $(\tau, \delta)$ -stable (e.g., [6, 2.1v]). Hence,  $IS = SI$ , and  $P = \text{ann}(S/IS)_S = IS$ . Further, it is a triviality that  $I$  is  $(\tau, \delta)$ -prime. Next, assume that  $I \neq Q$ . Consequently,  $I$  is not a prime ideal, and so  $I$  is a  $(\tau, \delta)$ -prime ideal by [5, 3.1]. It therefore follows from [5, 3.3] that  $P_0 = IS = SI$  is a prime ideal of  $S$ . Moreover,  $P_0 \subseteq P$  and  $P_0 \cap R = P \cap R = I$ .

Because  $Q$  is minimal over  $I$ , and  $R$  is commutative, it follows that  $Q$  is an annihilator prime of  $(R/I)_R$ . In particular,  $Q$  is an annihilator prime of  $(S/P_0)_R$ . Hence, by [6, 5.5],  $P_0 \supseteq \text{ann } U_S = P$ . The lemma follows.  $\square$

**2.6. Lemma.** *Suppose that  $Q$  is a maximal ideal of  $R$  and that  $S/P$  is artinian. Then  $S/P$  has finite length as a right  $R$ -module.*

*Proof.* First, it follows from [6, 4.4] that every prime ideal of  $R$  minimal over  $P \cap R$  is maximal, and so  $R/(P \cap R)$  is artinian. Therefore, if  $P \neq \text{ann } U_S$ , the desired conclusion follows from [6, 5.9i]. Now assume that  $P = \text{ann } U_S$ . Therefore, by (2.5), we may assume without loss of generality that  $P = 0$ . But then  $y$  is a regular noninvertible element of  $S$ , a contradiction to the fact that  $S$  is artinian (e.g., [13, 3.1.1]).  $\square$

### 3. INDUCED BIMODULES

Chapter 5 of [6] contains an extensive analysis of the prime ideals of  $S$  that occur as annihilators of factors of bimodules of the form  $A \otimes_R S$  where  $A$  is the Goldie quotient ring of a prime factor ring of  $R$ . We shall need one element of the corresponding analysis of bimodule subfactors of  $A \otimes_R S$ , as follows. In the case of a bimodule factor, this lemma is a consequence of [6, 5.4, 5.5].

**3.1. Lemma.** *(Here  $R$  need not be commutative.) Let  $P$  be a prime ideal of  $S$  and  $Q$  a prime ideal of  $R$ , and let  $A$  denote the Goldie quotient ring of  $R/Q$ . Further assume that  $P$  is the right annihilator in  $S$  of an  $A$ - $S$ -bimodule subfactor  $K$  of  $A \otimes_R S$  that is torsionfree as a right  $(S/P)$ -module. Then every prime ideal in  $R$  minimal over  $P \cap R$  belongs to the  $\tau$ -orbit of  $Q$ .*

*Proof.* Choose a nonzero element  $\ell \in K$  and let  $L = A\ell R$ . It follows from [6, 4.6] that  $R/(P \cap R)$  has an artinian quotient ring and that every regular element of  $R/(P \cap R)$  is regular in  $S/P$ . Hence,  $L$  is torsionfree as a right  $(R/(P \cap R))$ -module, and by Small's Theorem (e.g., [7, 10.10]) and [7, 6.3], it follows that every annihilator prime of  $L_R$  is minimal over  $P \cap R$ . We leave to the reader the verification that  $L$  has finite length as a left  $A$ -module. Now choose a simple  $A$ - $R$ -sub-bimodule  $M$  of  $L$ . The right annihilator in  $R$  of  $M$

is a prime ideal, say  $Q'$ , and we have just seen that  $Q'$  must be minimal over  $P \cap R$ . However, it follows from the proof in [6, 4.4] that  $M$  is isomorphic to  $A^{\tau^j}$  as an  $A$ - $R$ -bimodule, for some positive integer  $j$ . (As a left  $A$ -module,  $A^{\tau^j}$  has the same structure as  $A$ , but the right  $R$ -module structure is defined by the operation  $a * r = a\tau^j(r)$ , for every  $r \in R$  and  $a \in A$ .) It therefore follows that  $Q' = \tau^{-j}(Q)$ , and the desired conclusion now follows from [6, 4.4].  $\square$

**3.2. Proposition.** *Let  $M$  be a maximal ideal of  $R$ . Then the right annihilator in  $S$  of  $S/MS$  is prime.*

*Proof.* Set  $V = S/MS = (R/M) \otimes_R S$ , and let  $P$  denote a maximal annihilator prime of  $V_S$ . It follows from [6, 5.6iv] that  $V$  is uniform as an  $R$ - $S$ -bimodule, and it is therefore easy to verify that every annihilator prime of  $V_S$  is contained in  $P$ . If  $P = \text{ann } V_S$ , then there is nothing to prove, and so we suppose otherwise. Next, let  $0 = V_0 \subset V_1 \subset \cdots \subset V_n = V$  be an affiliated series for  $V$  (see, e.g., [7, p. 33]), where  $n > 1$ , and set  $P_i = \text{ann}(V_i/V_{i-1})_S$  for  $1 \leq i \leq n$ . (Note that  $P_1 = P$ .) If  $i > 1$ , it follows from [6, 5.6iii] that  $V_i/V_{i-1}$  has finite length as a left  $R$ -module. It therefore can be deduced from Lenagan's Theorem (e.g., [7, 7.10]) that  $(V_i/V_{i-1})_S$  has finite length for  $i > 1$ . However, it now follows from [7, 7.2] that  $S/P_i$  is an artinian ring. In particular, each  $V_i/V_{i-1}$  is torsionfree as a right  $(S/P_i)$ -module, and in view of (3.1), the prime ideals of  $R$  minimal over  $P \cap R$  are therefore maximal ideals. We may now conclude from (2.6) that each  $S/P_i$  has finite length as a right  $R$ -module for  $i > 1$ .

We next prove that  $S/P = S/P_1$  is artinian and has finite length as a right  $R$ -module. If  $P_2$  is an annihilator prime of  $V_S$ , then  $P_2 \subseteq P$  and there is nothing to prove. So we may assume otherwise. It then follows from [11, 1.2] that there is a series of links (e.g., [7, p. 178]) from  $P_2$  to some annihilator prime  $P'$  of  $V_S$ . However, it now follows from [7, 7.2, 7.10] that  $P'$  is coartinian. Hence  $P = P'$  is coartinian, because  $P' \subseteq P$ . Next, it follows from (3.1) that every prime ideal of  $R$  minimal over  $P \cap R$  is a maximal ideal. Thus  $S/P$  has finite length as a right  $R$ -module by (2.6).

To conclude, it now follows that  $V_i/V_{i-1}$  has finite length as a right  $R$ -module for all  $1 \leq i \leq n$ . But we are now forced to conclude that  $V_R$  has finite length, an absurdity. The lemma follows.  $\square$

#### 4. ASCENDANCY OF THE JACOBSON CONDITION

**4.1. Lemma.** *Assume that  $R$  is artinian and  $(\tau, \delta)$ -prime. Then  $S$  is a Jacobson ring.*

*Proof.* First, it follows from [5, 2.3] and [4, 5\*] that  $R$  is  $(\tau, \delta)$ -simple. Also,  $R$  is a Jacobson ring, and so by [10, 3.5] we may assume that  $\tau$  is not the identity. Now assume that  $R$  is  $\tau$ -prime. Then it follows from [5, 3.7] that  $\delta$  is inner, and so the desired conclusion follows from [4, 1.11\*] and, for example, [5, 1.5c]. It remains to consider the case that  $R$  is not  $\tau$ -prime. Therefore, by [5, 2.6],  $R$  is  $\delta$ -prime and has a unique maximal ideal  $M$ . From [5, 2.6, 4.6] it follows that  $S$  contains a subring  $A = (R/M)[y'; \delta']$ , where  $y' \in S$  and  $\delta'$  is a derivation of  $R/M$ , and it follows from [10, 3.5] that  $A$  is a Jacobson ring. It is proved in [5, 4.6] that  $S$  is finitely generated as a left  $A$ -module. Therefore,  $S$  is a Jacobson ring by [2, Theorem 1].  $\square$

Recall that a prime ideal  $P$  of  $S$  is said to *lie over* a prime ideal  $Q$  of  $R$  when  $Q$  is minimal over  $P \cap R$ .

**4.2. Lemma.** *Assume that there exists a maximal ideal  $M$  of  $R$  such that the module  $V = (S/MS)_S$  is faithful. Then  $S$  is semiprimitive.*

*Proof.* First suppose that  $M$  is minimal. By (3.2),  $S$  is prime, and so by [6, 5.12], the minimal prime ideals of  $R$  are all contained within a single  $\tau$ -orbit. Therefore, all minimal prime ideals of  $R$  are maximal, and so  $R$  is artinian. Moreover, because  $S$  is prime, and because nonzero  $(\tau, \delta)$ -ideals of  $R$  induce to nonzero ideals of  $S$ , it follows that  $R$  is  $(\tau, \delta)$ -prime. Hence, by (4.1),  $S$  is semiprimitive. Thus we may assume that  $M$  is not minimal.

Next, suppose that  $\tau(M) = M$ . Since  $V_S$  is faithful,  $MS$  cannot be an ideal of  $S$ , and so  $M$  is not  $\delta$ -stable. Thus no ideal of  $S$  contracts to  $M$ ; see [6, 2.1v]. Now suppose that  $N$  is a prime ideal of  $S$  lying over  $M$ . From the preceding observation it follows that  $N \cap R \neq M$ , and so  $I = N \cap R$  must be a  $(\tau, \delta)$ -prime ideal of  $R$  by [5, 3.1]. Moreover, our assumption that  $M$  not be a minimal prime ideal of  $R$  guarantees that  $I \neq 0$ . Hence  $IS$  is a nonzero ideal of  $S$  contained in  $MS$ , a contradiction to the faithfulness of  $V_S$ . Thus, no prime ideal of  $S$  lies over  $M$ . It therefore follows from [6, 5.7] that there exist no proper simple  $R$ - $S$ -bimodule factors of  $V$ , and so  ${}_R V_S$  is a simple bimodule. It is now straightforward to prove as follows that  $S$  is right primitive: Let  $K$  be a maximal right  $S$ -submodule of  $V$ , and let  $J = \text{ann}(V/K)_S$ . Then  $VJ$  is an  $R$ - $S$ -sub-bimodule of  $V$  that is not equal to  $V$ . Hence  $VJ = 0$ , and so  $J = 0$  by the faithfulness of  $V_S$ . Therefore  $V/K$  is a faithful simple right  $S$ -module.

Finally, assume that  $\tau(M) \neq M$ . Let  $L = \bigcap_{i \in \mathbb{Z}} \tau^i(M)$ , and note that  $L$  is a semiprime,  $\tau$ -prime ideal. By [5, 3.1], for each  $i \in \mathbb{Z}$  there exists a prime ideal of  $S$  contracting to  $\tau^i(M)$ . Hence, there exists an ideal of  $S$  contracting to  $L$ , and it follows, for example, from [6, 2.1v] that  $L$  is  $(\tau, \delta)$ -stable. Therefore,  $LS = SL$  is an ideal of  $S$  contained within  $MS$ , and so  $LS = 0$  because  $V_S$  is faithful. Consequently,  $L = 0$ , and hence  $R$  is a semiprime,  $\tau$ -prime ring.

To conclude, let  $J = J(S)$ , and suppose that  $J \neq 0$ . Note that the set of leading coefficients of elements of  $J$ , together with 0, namely the set

$$\{a \in R \mid ay^t + a_{t-1}y^{t-1} + \cdots + a_0 \in J \text{ for some } a_0, \dots, a_{t-1} \in R\},$$

is a nonzero  $\tau$ -ideal of  $R$ . This ideal must contain a regular element since  $R$  is  $\tau$ -prime, and therefore there exists a polynomial  $f \in J$  with positive degree and regular leading coefficient. Since  $1 + f$  is a unit, there exists another polynomial  $g$  such that  $(1 + f)g = 1$ . But the degree of  $(1 + f)g$  is certainly greater than zero, by the regularity of the leading coefficient of  $f$ , and we thus obtain a contradiction. Hence,  $J = 0$ , and the lemma follows.  $\square$

**4.3. Theorem.** *Assume that  $R$  is a commutative noetherian Jacobson ring. Then the skew polynomial ring  $S = R[y; \tau, \delta]$  is a Jacobson ring.*

*Proof.* Suppose that the theorem is false, and let  $P$  denote a maximally chosen nonsemiprimitive prime ideal of  $S$ . As in (2.1), we may select a prime ideal  $Q$  of  $R$  such that  $Q$  is minimal over  $P \cap R$  and such that  $P$  is the annihilator in  $S$  of an  $A$ - $S$ -bimodule factor of  $A \otimes_R S$ , where  $A$  is the field of fractions for  $R/Q$ . If  $P \neq \text{ann}(S/QS)_S$ , then  $P$  is semiprimitive, by (2.4). Therefore,

by (2.5), we may assume without loss of generality that  $P = 0$ . Furthermore,  $Q$  is equal to the intersection of those maximal ideals of  $R$  that contain it. In particular,

$$QS = \bigcap \{ MS \mid M \in \max R \text{ and } M \supseteq Q \}.$$

Therefore,

$$0 = \text{ann}(S/QS)_S = \bigcap \{ \text{ann}(S/MS)_S \mid M \in \max R \text{ and } M \supseteq Q \}.$$

Next, it follows from the above equalities and (3.2) that if there exists no maximal ideal  $M$  in  $S$  such that  $M \supseteq Q$  and  $(S/MS)_S$  is faithful, then some intersection of nonzero prime ideals in  $S$  is equal to zero, a contradiction to the fact that each nonzero prime ideal of  $S$  is semiprimitive. Thus, there exists a maximal ideal  $M$  in  $R$  such that  $(S/MS)_S$  is faithful. Therefore, it follows from (4.2) that  $S$  is semiprimitive, a contradiction to our hypothesis. The theorem follows.  $\square$

**4.4. A question of Small.** A possible generalization of the preceding theorem would include the replacement of the commutativity hypothesis with the assumption that  $R$  satisfy a polynomial identity. L. W. Small has informed us of his unpublished proof that if  $R$  is an affine PI algebra over a  $(\tau, \delta)$ -constant field  $k$ , then  $S[u, v] = R[y; \tau, \delta][u][v]$  is generically flat over  $k[u]$ , and consequently,  $S$  is a Jacobson ring (cf. [13, 9.3.13]). Small further raises the following question: If  $T$  is a filtered noetherian ring such that  $\text{gr}T$  is Jacobson, must  $T$  also be Jacobson? (We thank L. W. Small for the remarks discussed here.)

#### NOTE ADDED IN PROOF (DECEMBER 1994)

A. D. Bell has communicated two counterexamples to Small's question; however, in one example the filtration is a  $\mathbb{Z}$ -filtration, while in the other,  $\text{gr}T$  is not noetherian. The following modification of Small's question remains open: If  $T$  is a nonnegatively filtered noetherian ring such that  $\text{gr}T$  is Jacobson and noetherian, must  $T$  be noetherian?

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