

WHEN?

The Biblical Timing for Prophetic Fulfillment

RON J. BIGALKE



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Dr. John & Mrs. Norma Whitcomb.

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ENDORSEMENTS

Dr. Ron Bigalke's book, *The Biblical Timing for Prophetic Fulfillment*, presents a thorough examination of prophetic Scripture, highlighting many important issues such as Israel, the church, the rapture and the millennium. This work addresses the varied views on prophecy that have confused many, such as preterism and amillennialism, with scholarly detail. Ron's excellent research contributes to a much clearer understanding of the times in which we live and, in particular, the future that is to come. This book deserves a large distribution among those who concern themselves with prophetic Scripture.

— **Arno Froese**

Executive Director, Midnight Call Ministry
Editor-in-Chief, *Midnight Call* and *News From Israel*

Ron J. Bigalke has produced a clear and substantive examination of one of the major areas of debate when it comes to eschatology—timing. Bigalke deftly weaves together exegesis, history and critique as he evaluates the four major schools (as well as variations within each) of prophetic interpretation. The book begins with a clear discussion of terms and then guides the reader through a unique analysis of how each of the four major views sees the timing of the millennium and the rapture. The author's evidence provides compelling evidence for a premillennial and pretribulational position driven by a consistent hermeneutic. I found this volume to be Biblically and logically satisfying. Highly recommended!

— **Dr. Jerry Hullinger**

Professor of Bible, Piedmont International University

When? is not a book for superficial Bible readers. If you are serious about Scripture and want a deep dive into eschatology, this book is a must read. While the doctrine of future things has lost its popularity, it is foundational to our faith and as basic as this statement by Bigalke: “The primary difference between premillen-

nial and non-premillennial systems is hermeneutical.” Your entire approach to Scripture will be demonstrated by your position on prophecy.

— **Paul Seger**

General Director, Biblical Ministries Worldwide

Within Evangelical Christianity, the study of eschatology, or what the Bible reveals about the end, can be one of the most divisive and polarizing of subjects. The reason for such a sharp difference of opinion typically relates not to the *what* question but rather to the *when* question. For example, while most Christians believe in a rapture of some kind, the debate concerns the timing of the rapture. Will it be before, in the middle of, or at the end of the tribulation period? Moreover, while most Christians believe in the manifestation of the kingdom of Christ, the debate concerns when this kingdom will materialize. In other words, will it occur before or after Christ's second advent? Furthermore, while most Christians accept as true the prophetic contents of the book of Revelation (Rev. 4—22), the debate concerns when these prophetic details will be fulfilled. For example, have they been fulfilled in the past, are they being fulfilled today, or will they be fulfilled in the future? All of these hot-button topics relate not to the question of *what* but rather to the question of *when*. If you have ever been perplexed concerning *when* key prophetic events will take place related to the kingdom, the rapture and the fulfillment of the book of Revelation, then this book is for you. In the present volume, Dr. Ron Bigalke painstakingly sets forth a compelling case concerning the prophetic timing related to these vital subjects. He convincingly demonstrates to the reader that the futurist, pretribulation and premillennial understanding of eschatological events is the proper Biblical understanding. He also takes his readers a step further by explaining why this proper timing sequence is important and how it relates to their personal lives. This work receives my highest recommendation.

— **Dr. Andy Woods**

Pastor-Teacher of Sugar Land Bible Church
President of Chafer Theological Seminary



FOREWORD

If memory serves me correctly, I first met Dr. Ron J. Bigalke more than a decade ago at a conference on Biblical eschatology in which we were both making presentations. We were certainly aware of each other prior to this, as we were both active in trying to impact our respective communities for Biblical truth. We both were involved in academic service and pastoral ministries, and we both shared a passion for focusing our listeners and readers on the importance of methodology in handling the Bible, drawing theological conclusions from the Bible and applying the Bible in everyday life. I remember being appreciative even then of the thoroughness, objectivity and precision with which he spoke. We quickly developed a friendship and became co-laborers in several contexts. We collaborated on a number of writing projects, shared editing responsibilities for an academic journal and were involved together in teaching and administration of a seminary. Through this time, I have observed that Bigalke has remained consistently committed and true to the simplicity of

the Bible and the method it prescribes for developing theological conclusions and practical applications. He has done so in a way that reflects a high value of depth and rigor of scholarship. His personal commitment to study and growth is reflected in his quality credentials and academic experience and influence, but more importantly he puts all that to use in the simple service of others. His is not simply an academic pursuit; it is intensely practical, and is reflected in his ongoing service to real people in real contexts. Thus, the quality of his present work is no surprise to me—nor is the tone in which he presents it.

As I recall, it was Mark Twain who once said, “If a man doesn’t believe as we do, we say he is a crank, and that settles it.” Twain’s lament was a general one and broadly applicable, but it could have been said to characterize much of the mood in theological discussion. So often in theological matters issues are “settled” by *ad hominem* attacks rather than by evenhanded considerations of the issues and fair representations of those who hold to differing views. In the 20th century, due in part to globalization, advances in technology, the narrative of two world wars and the general trajectory of history, eschatology captured the attention of the evangelical world in ways it had not previously, and theologians worked to address specific questions that had previously gone unexamined. Resulting views were diverse, and while there were many respectful and gracious thinkers holding to these diverse views, the general mood of the broader discussion seemed less than cordial and more deserving of Twain’s description.

In a 21st-century approach, Dr. Bigalke addresses key eschatological questions with scholarly evenhandedness, and a charitable approach, representing the diverse views he encounters with respect, clarity and technical precision. He emphasizes accurately the centrality of hermeneutic method as the primary catalyst for diversity of views in the areas covered. The disagreements he discusses here are not generally rooted in ill motivations or ignorance, but are largely the result of sincerely held beliefs that are

theologically derived. Bigalke's work here is important, as it is careful not to attack differing thinkers, but rather to focus on the derivations of the diverse views themselves. Bigalke encourages readers to examine things from an exegetical perspective—recognizing what even those who disagree with his (premillennial, dispensational) conclusions will acknowledge: If we consistently apply literal, grammatical, historical hermeneutics to the Biblical text, we will draw premillennial and dispensational conclusions (even if there are nuanced differences here or there).

Bigalke's is a timely methodological discussion, focusing appropriately on . . . timing. He provides here a straightforward catalog—a handbook of sorts—of major distinctions between dispensational and non-dispensational views, but the uniqueness of this work is in its organization by chronology of events. This structure underscores a thoroughness, as the catalogued events are not handled in isolation, but rather in their appropriate chronological context. This allows Bigalke to be comprehensive without being voluminous, and the approach further fosters good representation of the differing methodologies for handling eschatology and the contexts they encompass.

As Bigalke articulates the reasons certain conclusions are to be preferred, the practical implications are not lost here. He appeals to Christians that the prophetic Word of Scripture matters to each of us in our lives. Through the record of Biblical prophecy, we ought to gain even greater confidence in our Lord as we engage the path He has prepared for us. Further, Bigalke appeals to Christians that Biblical prophecy, rightly understood, provides a tremendous urgency and tool for reaching those who do not know Christ.

Brothers and sisters, we have much work to do. Let us take our next steps with the knowledge and confidence of Biblical prophecy and its implications for life.

Christopher Cone, Th.D., Ph.D., Ph.D.

August 2017



PREFACE

One dynamic of godly living is “looking for the blessed hope and the appearing of the glory of our great God and Savior, Christ Jesus” (Tit. 2:13). As the Greek verb translated “looking for” is in the present tense, it signifies a characteristic attitude: being always ready to meet the returning Lord. Therefore, with this hope in mind, Scripture reminds believers (in v. 14) that the Lord Jesus, who will be met someday, is the one who redeemed his people from all wickedness. The reason for this redemption is to purify a people who are “zealous for good deeds.” The doctrine of the Lord’s return, which is woven throughout the New Testament, addresses the motivation for godliness.

There is not a single Bible verse that reveals precisely when the Lord will return for his church in relation to the tribulation or the second coming (in a manner that would satisfy everyone). However, this does not imply that the Bible does not straightforwardly reveal the timing of the Lord’s return.

Many Biblical doctrines are not derived from a solitary verse of Scripture; rather, those teachings are developed into systematic conclusions by harmonizing several passages.

Some truths are revealed explicitly in the Bible, such as the deity of Christ (Isa. 9:6; John 1:1; Heb. 1:1-8) or salvation by grace through faith in Christ alone (Hab. 2:4; Gal. 3:10-12; Eph. 2:8-10). Other doctrines, such as the Biblical revelation of God as triune, are affirmed by harmonizing the many passages that relate to such teaching. The most inexplicable and mysterious revelation concerning the Biblical description of God is that, though the Bible is unequivocal in its declaration that there is one God, there are three distinct personalities to whom deity is ascribed. Consequently, the only teaching that is faithful to all the Biblical evidence is what is known as the Trinity (or tri-unity) of God. Similarly, a literal, systematic interpretation of all New Testament passages relating to the Lord's return will lead to the pretribulationist assertion that Jesus will translate all living believers and resurrect all dead believers at least seven years prior to his coming to establish his 1,000-year reign upon the earth.

Similar to the doctrine of the Trinity, the timing of the Lord's return must be developed from a literal interpretation, in addition to the harmonization of many Biblical passages. Consequently, pretribulationism is best understood by considering the doctrine according to three aspects: (1) foundational issues; (2) specific Biblical texts; and, (3) practical implications. Foundational issues involve the role of timing in prophetic fulfillment. For instance, one must answer when will a Biblical prophecy be fulfilled historically. The four classical answers to that question are preterism, historicism, idealism and futurism, which are addressed in chapters 1-5.

Understanding there are only four possibilities in relation to the time of prophetic fulfillment helps to provide a Biblical foundation for understanding the pretribulationist rapture. Throughout chapters 1-5, it will be evident that premillennialism is foundational to the doctrine of

the rapture, and one's understanding of prophetic timing directly affects whether to embrace amillennialism, postmillennialism or premillennialism. The doctrine of the rapture is a premillennial consideration, and thus if one embraces preterism or idealism, that person will not be concerned with the Lord's coming for his church in relation to the future tribulation. (Due to the particularities of historicism, one could only affirm midtribulationism or posttribulationism in that perspective). Chapter 6 addresses other foundational issues, such as literal interpretation and the distinction between Israel and the church. Chapters 7-13 consider the specific Biblical texts concerning the doctrine of the rapture, in addition to considering the practical implications in the defense of pretribulationism (chs. 11-13). Finally, in an age in which many neglect the study of Biblical prophecy, a concluding application of the doctrine's importance is the subject of chapter 14.

A word of appreciation is due *Midnight Call* for gracious permission to reproduce in revised form much of the material that already appeared in a series of articles. Dr. Randy White, founder and CEO, and Paul Scharf, editor in chief, for the Dispensational Publishing House also deserve indebtedness for their encouragement and support to publish this work. The work herein is commended to God and to students of the Word of God in the hope that it will provide greater clarity of the prophetic Scriptures.

CHAPTER 1



THE INTERPRETATION OF BIBLICAL PROPHECY

The word eschatology is derived from two Greek words, eschatos (“last”) and logos (“discourse”), meaning the doctrine of last things. Biblical eschatology can be divided into two categories: personal eschatology and general eschatology. Personal eschatology addresses the subjects of death, hell and resurrection. General eschatology addresses the timing of events such as the tribulation and millennium. Whereas there is slight disagreement among evangelicals in regards to personal eschatology, there is significant disagreement among evangelicals in regards to general eschatology. The main reason for such disagreements has to do with one’s usage or disregard of a consistent and literal interpretation of Biblical prophecy. Of course, interpretative differences are certainly true in regard to the timing of prophetic fulfillment and the meaning of the millennium. Knowledge of the various theological systems

of prophetic timing fulfillment provides understanding of the logic and tenets of the various views regarding the meaning of the millennium. If the basic characteristics of preterism, historicism, idealism and futurism are understood, then it is not difficult to understand a particular position regarding the millennium. Furthermore, the views of prophetic timing are more foundational as to what a person believes Scripture to reveal concerning the millennium.

THE TIMING OF PROPHETIC FULFILLMENT

Prior to proceeding further, one should understand what is meant by the terms “tribulation” and “millennium.” For instance, the word “tribulation” is not a technical term; it can refer to general suffering (John 16:33; Acts 14:22; Rom. 5:3; 12:12), to the seven years of Daniel’s 70th week (Jer. 30:7-9; Dan. 9:24-27; 12:1), or to the second half of that week: the “great tribulation” (cf. Matt. 24:21 which refers to the last half of Daniel’s 70th week as the great tribulation, while Matt. 24:8 uses “beginning of sorrows” in reference to the first half).¹

The word millennium is derived from the Latin *mille* (“thousand”) and *annum* (“year”) in reference to the statement in Revelation 20:4 (“and they came to life and reigned with Christ for a thousand years”). The early church referred to the millennium by the Greek term, *chiliasm*. Throughout the history of the church, there have been three primary views concerning the nature of the 1,000 years: (1) amillennialism; (2) postmillennialism; and (3) premillennialism. Interpretative differences are the reason for the

¹ Daniel’s 70th week does not relate to God’s purpose for the church. The tribulation will come upon a world that is in rebellion against God (Rev. 15:1; 16:1-21; 19:15) and will reveal Satan’s nature (12:7-12). During the tribulation, national Israel will be brought to faith and repentance in the Messiah, which is in preparation for the millennial kingdom (Jer. 30:7-9; Zech. 12:9—14:5; Rev. 19:1-6); it will also be a time of profound evangelism (Matt. 24:14; Rev. 6:9-11; 7:1-17; 11:2-14; 12:13-17; 13:7; 14:1-5, 12-13).

three views, such as whether to understand “thousand” in Revelation 20 as literal or symbolic. How one understands the millennium will also influence views concerning the details of eschatology. Directly influencing one’s view of the millennial kingdom is how one understands the fulfillment of Biblical prophecies to occur.

There are four possible views concerning the timing of prophetic events: preterism (past), historicism (present), idealism (timeless), and futurism (future). Preterism is the view that the majority of prophetic events have already been fulfilled. Historicism equates the current church age with the time of the tribulation; therefore, prophetic events are regarded as being fulfilled throughout the church age. Idealism is the view that the Bible does not specify a time (chronology) for the fulfillment of prophetic events. Recognizing that approximately 300 prophecies were fulfilled literally in regard to the first coming of Christ, futurism believes that the remaining prophecies associated with the Lord’s second coming will also be fulfilled literally in an eschatological period.

As already stated, unfortunately, significant disagreement exists among evangelicals in regard to general eschatology. However, the interpretative differences are certainly not due to lack of clarity in Scripture, but they exist mainly because of one’s usage or disregard of a consistent and literal interpretation of Bible prophecy. The most natural interpretation of unfulfilled Biblical prophecies leads to a pretribulational and premillennial expectation. Disagreements exist due to inconsistency in Biblical interpretation (of course, this could be said about so many doctrines of the Bible). How one understands the timing of prophetic fulfillment also influences an understanding of the meaning of the millennium. Throughout this work, the reader will understand how one’s understanding of prophetic fulfillment relates to an understanding of the meaning of the millennium (and why all the views on the timing of prophetic fulfillment could be consistent with postmillennialism, but not with amillennialism and premillennialism).

Preterism

Preterism is a term from the Latin *praeter* meaning “past.” The preterist view is that most, if not all, of prophetic fulfillment has already occurred.² Preterists believe that they have already identified the beast of Revelation. The first beast of Revelation 13 is understood to be Nero and the second beast is understood to be Domitian. Moreover, preterists believe that everything in Revelation has been fulfilled centuries ago and has no meaning in the 21st century (apart from an apologetic purpose of proving the Bible is authentic). The preterist view limits the majority of eschatological references to salvation and judgment in the first century of the church.

2 The dating of the book of Revelation is a recurring argument in regards to preterism. Whereas the majority of Bible scholars date Revelation during the reign of Domitian (A.D. 81–96), the preterist *must* date Revelation during the reign of Nero (A.D. 54–68). Generally, preterism offers five basic arguments for an early dating of the book of Revelation. *First*, preterists connect descriptions of the Antichrist with the reign of Nero as emperor (e.g., Rev. 6:2; 13:1–18; 17:1–13). Assuming his conclusion before proving it, David Chilton wrote,

As we will see throughout the commentary, the Book of Revelation is primarily a prophecy of the destruction of Jerusalem by the Romans. This fact alone places St. John’s authorship somewhere before September of A.D. 70. Further, as we shall see, St. John speaks of Nero Caesar as still on the throne—and Nero died in June 68.” Second, preterists regard the letters to the seven churches in Revelation 2–3 as dealing with Jewish persecution of Christians that would result in the destruction of Jerusalem. Third, preterists believe that the Apostle’s intimate knowledge of the Temple in Revelation 11 indicates that he wrote Revelation while it still stood. Fourth, preterists say the testimony of Irenaeus is “somewhat ambiguous; and regardless of what he was talking about, he could have been mistaken.” Lastly, preterists connect the closing of the canon of Scripture with the destruction of Jerusalem and believe the canon to be in complete form by A.D. 70 (e.g., Daniel 9:24–27). Therefore, the major prophetic events in the New Testament have fulfillment at that time. The preterist viewpoint believes that the Titus and the Roman armies fulfilled these major prophetic events, such as the Olivet Discourse and Book of Revelation, when they destroyed Jerusalem in A.D. 70. (*The Days of Vengeance: An Exposition of the Book of Revelation* [Fort Worth: Dominion Press, 1987], p. 4).

Certainly persecution of Christians during the reign of Nero and the reign of Domitian was monstrous. As revenge for the burning of Rome (an event for which he claimed Christians were responsible), Nero began the first persecution of Christians. However, the majority of evidence favors a date in the reign of Domitian. Hobbs wrote, “Eusebius quotes Irenaeus as saying that the Book of Revelation was written during the closing period of Domitian’s reign. Many other early Christian writers (cf. Clement of Alexandria, Origen, Jerome) support this. The words ‘shortly come to pass’ in 1:1 suggest an event which would bring relief to the suffering saints. This could well refer to Domitian’s death in A.D. 96 suggesting a date late in his reign. So A.D. 95 is probably the date of the writing of Revelation” (Herschel H. Hobbs, *The Cosmic Drama: An Exposition of the Book of Revelation* [Waco, TX: Word Publishing, 1971], p. 11).

Historicism

Historicists agree that Biblical prophecy is a panorama of both church and secular history beginning with the apostolic church until the perfection of the age. Historicists typically will envision the history of the world as prewritten in apocalyptic language that overflows with symbols and visions. The majority of the Protestant Reformers were historicists.³ The Reformers believed that major prophetic writings, such as the book of Daniel, the Olivet Discourse and the book of Revelation revealed the rise of the Roman Catholic Church and God's destruction of that entity. The major prophetic writings were also believed to give exhortation to the church that would be purified during the time of the Reformation.

Within historicism, majority agreement regarding the prophetic fulfillment of the beginning and ending of historical movements cannot be ascertained; rather, Biblical prophecy provides the panorama of historical movements throughout the various ages. Historicism thus equates the current church age with the tribulation based upon the day-age theory. Historicists interpret literal numbers like 2,300 days (Dan. 8:14) and 1,290 days (Dan. 12:11) as years. They also view Biblical prophecy as finding continual fulfillment in the present age. The minority view among historicists is that the destruction of Jerusalem in A.D. 70 was consistent with the breaking of the seals of Revelation.⁴ The majority view is that the breaking of the first seal is consistent with the death of Domitian in A.D. 96. The other six seals are associated with the rise and fall of the Western Roman Empire, which would include the invasion

³ The majority of the cults appear to be historicists (there are reasons why this is true, which is another subject for another time, which are different than the reasons why most of the Protestant Reformers were historicists).

⁴ See Adam Clarke, *Clarke's Commentary on The New Testament, Volume 5: Matthew through Luke* [CD-ROM] ("The Master Christian Library," v. 6, AGES Software, 1998), pp. 451–72; Clarke, *Volume 8: 1 Thessalonians through Revelation* (AGES Software), pp. 1083–89; Matthew Henry, *Commentary on the New Testament* (AGES Software), pp. 81–3, 719–21.

by the German barbarians (Ostrogoths, Visigoths and Vandals) around the middle of the fifth century.⁵

Whenever historicism is dominant, it is characteristic to witness the portrayal of many time schemes that relate primarily to the end of the world and to the Lord's second coming. Although it may seem that date-setting is a common practice in current times, the truth is that there are fewer time schemes today. The media can give the appearance that date-setting is more common because stories of that variety appeal to both secular and religious persons. Indeed, if one desires to write a bestseller in the field of prophecy, one need simply do something as sinister as name the Antichrist and set a date for the Lord's return. There have been hundreds, if not thousands, of date-setting (or date-hinting) schemes from the time of the early church until the present, yet all those schemes are proven to be false prophecies.

Idealism (Spiritual or Timeless View)

Idealists interpret Biblical prophecy not as an indication of eschatological events to be fulfilled (historicism and futurism) or that have been fulfilled (preterism); they interpret prophecy texts as representative of the conflict—recorded in symbolic and metaphoric language—between good and evil. Therefore, Biblical prophecy is not an actual record of historical events or future events, which means there is no single historical fulfillment. As it merely sets forth great principles that are common throughout the age of the world, Biblical prophecy is applicable to believers in any age, and history is almost completely separate from its fulfillment.

Idealism stresses great ethical principles—hidden in symbols and metaphors—with regard to world events that occur. The conflict between good and evil continues, but the triumph of the ages will be the victory of the good. In the idealist view, time and history for Biblical prophecy are

⁵ See Albert Barnes, *Barnes' Notes on the Old and New Testaments* (Grand Rapids: Baker/Revell, 1983); E. B. Elliott, *Horae Apocalypticæ* (London: Seeley, Burnside, and Seeley, 1847).

meaningless. Biblical prophecy is an allegory of the spiritual conflict between good and evil. Idealism, therefore, does not affirm belief in an eschatological rapture, tribulation, Antichrist or literal 1,000-year millennium.

A refinement within idealism may be termed “eclecticism.” Eclectics attempt to amalgamate what they perceive as the strengths from each of the other interpretive views. Osborne explained, “The solution is to allow the preterist, idealist, and futurist methods to interact in such a way that the strengths are maximized and the weaknesses minimized.”⁶ Thomas identified the problem with the eclectic approach.

The combination approach is deficient on another ground: it leaves to human judgment the determination of where the details of a text end and its general picture begins. Allowing this liberty for subjective opinion cannot qualify as objective interpretation. In other words, it cannot satisfy the criteria of a grammatical-historical system of hermeneutics such as has characterized an evangelical Christian understanding of Scripture. . . . No provision can be made for elasticity of interpretation that allows for a change in meaning from generation to generation and from place to place.⁷

The error of the eclectic approach is the tendency of the interpreter to ascribe different meanings to the same vision, which results in the words of a prophetic text meaning almost anything. Different interpreters will make decisions regarding a text in various manners resulting in interpretations that are just as diverse as the eclectic approach, and obviously negates the reality that God’s Word has one primary meaning. Beale is an example of such confusion arising from the eclectic approach.

Accordingly, no specific prophesied historical events are described in the book [Revelation], except for the final coming of

⁶ Grant R. Osborne, *Revelation* (Grand Rapids: Baker, 2002), p. 21.

⁷ Robert L. Thomas, *Revelation 1-7* (Chicago: Moody Press, 1992), p. 35.

Christ to deliver and judge and to establish the final form of the kingdom in a consummated new creation – though there are a few exceptions to this rule⁸ [E.g., 2:10, 22 and 3:9-10, which are unconditional prophecies to be fulfilled imminently in the specific local churches of Smyrna, Thyatira, and Philadelphia.⁹].

The arbitrary nature of the eclectic approach is evident in the assertion that “no specific prophesied historical events are described” and yet the eclectic can make reference to “unconditional prophecies to be fulfilled imminently.” The increasing popularity of eclecticism is certainly consistent with the spirit of postmodernism.

Futurism

Futurists believe that prophetic fulfillment regarding the rapture, tribulation, second coming and millennium is in an eschatological period. Consistent futurism teaches that the tribulation, second coming and millennium are all future events pertaining to national Israel. Consistent futurists should never fluctuate between historicism and futurism. Some futurists do interpret current events as fulfilling prophecy; however, when futurists interpret in this manner they are being inconsistent in their interpretation of Scripture. Any date-setting scheme is inconsistent with the principles of futurism that recognize a distinction between Israel and the church.

Biblical prophecy cannot be fulfilled in the present age *if it is prophesied to occur during the tribulation*. Current events cannot be claimed as the fulfillment of prophecy; neither can they be claimed as the sign of Christ’s coming. The legitimacy of this assertion is true no matter how many false christs, wars and rumors of wars, famines and earthquakes are present today. History is replete with those who thought they had identified the sign of Christ’s coming only to express commiseration for their great

8 G. K. Beale, *The Book of Revelation* (Carlisle, UK: The Paternoster Press, 1999), p. 48.

9 *Ibid.* fn. 16.