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**COUNTING FUNCTIONS AND MAJORIZATION FOR JENSEN  
MEASURES**

CHARLES STUART STANTON

# COUNTING FUNCTIONS AND MAJORIZATION FOR JENSEN MEASURES

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We establish a generalization for uniform algebras of the classical identities of Hardy and Stein. We use this and an estimate based on the isoperimetric inequality to give a proof of H. Alexander's spectral area theorem. We use similar methods to prove a theorem of Axler and Shapiro about VMOA of the unit ball in  $\mathbb{C}^n$ .

**1. Introduction.** Given a Jensen measure on the maximal ideal space of  $A$ , we introduce a "counting function" analogous to the classical counting function  $N(r, w)$  of Nevanlinna's value distribution theory. In particular, this counting function is non-negative, supported on the spectrum of  $f$ , and a subharmonic function of  $w$  on the complex plane except for a logarithmic pole. We next establish an identity for integral means of  $f$  in terms of this counting function. This generalizes Theorems 2 and 9 of [6]. Classical identities of Cartan and of Hardy and Stein occur as special cases.

As an application, we give a proof (for Jensen measures) of H. Alexander's spectral area estimate:

**THEOREM A [1, 2].** *Let  $A$  be a uniform algebra,  $\varphi \in M_A$ , and  $\sigma$  a Jensen measure for  $\varphi$ . Then*

$$(1) \quad \int_{M_A} |f|^2 d\sigma \leq \frac{1}{\pi} \text{area}(\text{spec } f) + |f(\varphi)|^2.$$

Finally, we apply these counting function techniques to prove a slight generalization of the following result of Axler and Shapiro about analytic functions of vanishing mean oscillation (VMOA) of the unit ball in  $\mathbb{C}^n$ .

**THEOREM B [3].** *Suppose  $f \in H^\infty(\mathbb{B}^n)$  and for each  $\zeta \in S$*   
$$\text{area}(\text{cl}(f, \zeta)) = 0.$$

*Then  $f \in \text{VMOA}$ .*

**2. Uniform algebras and Jensen measures.** We first recall some basic facts about uniform algebras and Jensen measures (for more details

see [7]). We then introduce the counting function and establish its subharmonicity.

Let  $X$  be a compact Hausdorff space and  $A$  a uniform algebra on  $X$ , i.e. a closed subalgebra of  $C(X)$  which contains the constants and separates points of  $X$ . Let  $M_A$  denote the maximal ideal space of  $A$ . The spectrum of  $f \in A$ , denoted  $\text{spec } f$ , is the set  $\{w \in \mathbf{C}: f - w \text{ is not invertible in } A\}$ .

Let  $\varphi \in M_A$ . A probability measure  $\sigma$  on  $M_A$  is a *Jensen measure* for  $\varphi$  if and only if

$$(2) \quad \log|f(\varphi)| \leq \int_{M_A} \log|f| d\sigma,$$

for every  $f \in A$ . Since  $\sigma$  is a Jensen measure it is also an *Arens-Singer measure* for  $\varphi$ :

$$(3) \quad \log|f(\varphi)| = \int_{M_A} \log|f| d\sigma,$$

for each invertible  $f$  belonging to  $A$ . It follows that  $\sigma$  is also a *representing measure* for  $\varphi$ :

$$(4) \quad f(\varphi) = \int_{M_A} f d\sigma$$

for each  $f \in A$ .

**DEFINITION.** Suppose  $f \in A$ ,  $\varphi \in M_A$ , and that  $\sigma$  is a Jensen measure for  $\varphi$ . Then, for each  $w \in \mathbf{C} \setminus \{f(\varphi)\}$ , we define

$$(5) \quad N(w; f, \sigma) = \int_{M_A} \log|f - w| d\sigma - \log|f(\varphi) - w|.$$

**REMARK.** If  $\sigma = \alpha\tau + (1 - \alpha)\delta_\varphi$  with  $0 < \alpha < 1$  then  $\tau$  is also a Jensen measure for  $\varphi$  and  $N(w; f, \sigma) = \alpha N(w; f, \tau)$ . We shall assume that  $\sigma(\varphi) = 0$  in the following. We shall also denote  $N(w; f, \sigma)$  by  $N(w)$  when  $f$  and  $\sigma$  have been fixed.

The properties of  $N(w)$  are summarized by

**PROPOSITION 1.** *Suppose  $f \in A$ ,  $\varphi \in M_A$ , and that  $\sigma$  is a Jensen measure for  $\varphi$ . Then  $N(w)$  is a non-negative function supported on  $\text{spec } f$ . Furthermore,  $N(w)$  is subharmonic on  $\mathbf{C} \setminus \{f(\varphi)\}$ , and  $N(w) + \log|f(\varphi) - w|$  is subharmonic on  $\mathbf{C}$ .*

*Proof.* The non-negativity is a consequence of the definition (2) of a Jensen measure; since a Jensen measure is also an Arens-Singer measure

the support of  $N(w)$  is contained in  $\text{spec } f$  by (3). To prove the subharmonicity we introduce the Borel probability measure  $f^*(d\sigma)$  supported on  $\text{spec } f$  defined by

$$\int_{M_A} (k \circ f) d\sigma = \int_{\mathbf{C}} h(\zeta) f^* d\sigma(\zeta)$$

for every  $h \in L^1(d\sigma)$ . Thus

$$\int_{M_A} \log |f - w| d\sigma = \int_{\mathbf{C}} \log |\zeta - w| f^*(d\sigma).$$

This establishes  $N(w) + \log |f(\varphi) - w|$  as the potential of the measure  $f^*(d\sigma)$  and hence a subharmonic function on  $\mathbf{C}$ . Since  $\log |f(\varphi) - w|$  is harmonic on  $\mathbf{C} \setminus \{f(\varphi)\}$ , we set that  $N(w)$  is subharmonic on  $\mathbf{C} \setminus \{f(\varphi)\}$ .

When  $A$  is the disc algebra the following result is known as Lehto's principle of majorization (see [10]):

**THEOREM 1.** *Let  $\Omega$  be an open set which contains  $\text{spec } f$ , and  $G_\Omega(w; f(\varphi))$  be the Green function for  $\Omega$  with pole at  $f(\varphi)$ . Then*

$$(6) \quad N(w) \leq G_\Omega(w; f(\varphi)).$$

**REMARK.** We shall always extend a Green function  $G_\Omega$  to all of  $\mathbf{C}$  by defining it to be identically zero outside of  $\Omega$ .

*Proof.* The theorem follows immediately from the maximum principle since  $G_\Omega(w; f(\varphi)) + \log |f(\varphi) - w|$  is harmonic on  $\Omega$  while  $N(w) + \log |f(\varphi) - w|$  is subharmonic on  $\Omega$  and  $N(w) \leq G_\Omega(w; f(\varphi))$  on the boundary of  $\Omega$ .

**3. Identities for integral means.** Our next result expresses integral means of  $f$  as an integral of  $N(w)$  weighted by an appropriate measure.

**THEOREM 2.** *Suppose  $\Psi$  is subharmonic on a disc  $\Delta_R = \{z: |z| < R\}$  which contains  $\text{spec } f$ . Let  $d\mu$  be the Riesz measure for  $\Psi$ . Assume  $\mu(f(\varphi)) = 0$ . Then*

$$(7) \quad \int_{M_A} \Psi(f) d\sigma = \int_{\mathbf{C}} N(w) d\mu + \Psi(f(\varphi)).$$

*Proof.* By the Riesz decomposition theorem for subharmonic functions

$$(8) \quad \Psi(\zeta) = \int_{\text{spec } f} \log |w - \zeta| d\mu(w) + h(\zeta).$$

Here the Riesz measure  $d\mu = (1/2\pi)\Delta\Psi$  in the sense of distributions and  $h$  is harmonic in the interior of  $\Delta_R$ . Thus  $h = \text{Re } H$  for some function  $H$  holomorphic on  $\{w: |w| < R\}$ . It follows from the “functional calculus” that  $H \circ f \in A$ . Since  $\sigma$  is a representing measure for  $\varphi$  we have by (4)

$$\int_{M_A} h \circ f d\sigma = h(f(\varphi)).$$

We now calculate, using the Riesz decomposition (8) and the definition of  $N(w)$ :

$$\begin{aligned} \int_{M_A} \Psi \circ f d\sigma &= \int_{M_A} \left\{ \int_{\Delta_R} \log |w - f| d\mu(w) + h \circ f \right\} d\sigma \\ &= \int_{\Delta_R} \int_{M_A} \log |w - f| d\sigma d\mu(w) + h(f(\varphi)) \\ &= \int_{\Delta_R} N(w) + \log |f(\varphi) - w| d\mu(w) + h(f(\varphi)) \\ &= \int_{\Delta_R} N(w) d\mu(w) + \Psi(f(\varphi)). \end{aligned}$$

Since  $N(w)$  is supported on  $\text{spec } f$  we may extend the last integral to be taken over the entire plane to obtain (7).

Two important special cases of (7) occur when we take  $\Psi(\zeta) = \log^+ |\zeta|$  and  $\Psi(\zeta) = |\zeta|^p$ . In the first case Theorem 2 implies

$$(9) \quad \int_{M_A} \log^+ |f| d\sigma = \frac{1}{2\pi} \int_0^{2\pi} N(e^{i\vartheta}) d\vartheta + \log^+ |f(\vartheta)|.$$

If  $A$  is the disc algebra and  $d\sigma$  is Lebesgue measure on the unit circle this is known as Cartan’s formula [9, p. 8]. In the second case we obtain, for  $p > 0$ ,

$$(10) \quad \int_{M_A} |f|^p d\sigma = \frac{p^2}{2\pi} \int_{\mathbb{C}} N(w) |w|^{p-2} du dv + |f(\varphi)|^p.$$

which is a version of the Hardy-Stein identity [13]. For applications of other choices of  $\Psi$  see [6].

**4. Alexander’s spectral area theorem.** The key estimate we will need is the following consequence of the isoperimetric inequality:

**PROPOSITION 3** ([11, p. 115], [4, p. 60]). *Let  $\Omega$  be a plane domain of finite area. Let  $G_\Omega(w, w_0)$  be the Green function for  $\Omega$  with pole at  $w_0$ . Then*

$$(11) \quad \int_{\Omega} G_\Omega(w, w_0) du dv \leq \frac{1}{2} \text{area}(\Omega).$$

*Proof of Theorem A.* Let  $\Omega$  be a region containing  $\text{spec } f$  such that  $\text{area } \Omega \leq \text{area}(\text{spec } f) + \varepsilon$ . By the Hardy-Stein identity (10), Lehto's principle of majorization (6), and the proposition above we have

$$\begin{aligned} \int_{M_\alpha} |f|^2 d\sigma &= \frac{2}{\pi} \int_{\mathbf{C}} N(w) du dv + |f(\varphi)|^2 \\ &\leq \frac{2}{\pi} \int_{\mathbf{C}} G_\Omega(w; f, \varphi) du dv + |f(\varphi)|^2 \\ &\leq \frac{2}{\pi} \frac{1}{2} \text{area}(\Omega) + |f(\varphi)|^2 \\ &\leq \frac{1}{\pi} (\text{area}(\text{spec } f) + \varepsilon) + |f(\varphi)|^2. \end{aligned}$$

Letting  $\varepsilon \rightarrow 0$  we obtain (1).

**5. Counting functions on  $\mathbf{B}^n$ .** Let  $\mathbf{B}^n$  denote the open unit ball in  $\mathbf{C}^n$  with normalized measure  $d\sigma$  on  $\partial\mathbf{B}^n$ . Suppose  $\alpha \in \mathbf{B}^n$ . The *Poisson-Szegő measure* for  $\alpha$  is

$$d\nu_\alpha(\zeta) = \left\{ \frac{1 - |\alpha|^2}{|1 - \langle \alpha, \zeta \rangle|^2} \right\}^n d\sigma(\zeta).$$

The Möbius transformation  $\varphi_\alpha$  is defined by

$$\varphi_\alpha(z) = \frac{\alpha - P_\alpha z - (1 - |\alpha|^2)^{1/2} Q_\alpha z}{1 - \langle z, \alpha \rangle},$$

where  $P_\alpha$  is the orthogonal projection of  $\mathbf{C}^n$  onto the subspace generated by  $\alpha$ , and  $Q_\alpha$  is the orthogonal complement to  $P_\alpha$ . The properties of  $\varphi_\alpha$  are summarized by

**PROPOSITION 4.** *Let  $\alpha \in \mathbf{B}^n$ ,  $z \in \overline{\mathbf{B}^n}$ ,  $h \in \mathbf{C}^n$ , and  $g \in L^1(\partial\mathbf{B}^n)$ . Then*

(12.a)  $\varphi_\alpha$  is a biholomorphism of  $\mathbf{B}^n$  onto  $\mathbf{B}^n$ ,

(12.b)  $\varphi_\alpha^{-1} = \varphi_\alpha$ ,

(12.c)  $1 - |\varphi_\alpha(z)|^2 = \frac{(1 - |\alpha|^2)(1 - |z|^2)}{|1 - \langle z, \alpha \rangle|^2},$

(12.d)  $\varphi_\alpha(z)h = \frac{(1 - |\alpha|^2)^{1/2}}{(1 - \langle z, \alpha \rangle)^2} \times \left\{ -(1 - |\alpha|^2)^{1/2} P_\alpha h - Q_\alpha h - z \langle h, \alpha \rangle + h \langle z, \alpha \rangle \right\}$

$$(12.e) \quad \int_{\partial \mathbf{B}^n} g \circ \varphi_\alpha d\sigma = \int_{\partial \mathbf{B}^n} g d\nu_\alpha,$$

*Proof.* Assertions (12.a–12.c) are contained in Theorem 2.2.2 of [12], and (12.d) may be obtained in the same manner as part (ii) of that Theorem. Part (12.e) is Theorem 3.3.8 of [12].

The Green function with pole at 0 for  $\mathbf{B}^n$  is

$$(13) \quad G_{\mathbf{B}}(z, 0) = \begin{cases} \log \frac{1}{|z|} & (\text{if } n = 1) \\ \frac{1}{2n - 2} (|z|^{2-2n} - 1), & (\text{if } n > 1) \end{cases}$$

We introduce the form

$$\beta = \frac{i}{2\pi} \sum_j dz_j \wedge d\bar{z}_j.$$

Then  $\beta^n$  is Lebesgue measure on  $\mathbf{C}^n$ , normalized so that  $\int_{\mathbf{B}} \beta^n = 1$ . We recall Wirtinger’s Theorem [8, p. 5]: If  $V$  is a  $k$ -dimensional variety then  $\beta^k$  is the induced volume form.

It follows from Jensen’s formula [14, p. 248] that  $d\sigma$  is a Jensen measure for 0 and that the counting function  $N(0; f, \sigma)$  defined by (5) is the usual counting function of value distribution theory in  $\mathbf{C}^n$ . In particular, if  $\mu(z)$  is the multiplicity of the zero at  $z$  then [14, p. 248]

$$N(0; f, \sigma) = \int_{f^{-1}(0)} \mu(z) G_{\mathbf{B}}(z, 0) \beta^{n-1}.$$

It follows from (5) and (12.e) that

$$N(w; f, \nu_\alpha) = N(0; f \circ \varphi_\alpha - w, \sigma)$$

and hence

$$(14) \quad N(w; f, \nu_\alpha) = \int_{\varphi_\alpha(f^{-1}(w))} \mu(z) G_{\mathbf{B}}(z, 0) \beta^{n-1}$$

where  $\mu$  is the multiplicity of the zero for  $f \circ \varphi_\alpha - w$  at  $z$ . Since the integrand on the right is non-negative it follows that  $\nu_\alpha$  is a Jensen measure for  $\alpha$ .

The counting function  $N(w; f, \nu_\alpha)$  may be extended to  $f$  in the Nevanlinna class (see [5, §4] for more details) by setting

$$N(w; f, \nu_\alpha) = \limsup_{\zeta \rightarrow w} \left( \lim_{r \rightarrow 1} (N(w; f_r, \nu_\alpha)) \right)$$

where  $f_r(z) = f(rz)$  for  $r < 1$ . Theorem 1 remains true in this context. If  $\Psi$  is a positive subharmonic function then Theorem 2 may be extended to

$$\lim_{r \rightarrow 1} \int_{\partial \mathbf{B}^n} f_r d\nu_\alpha = \int_{\mathbf{C}} N(w; f, \nu_\alpha) d\mu + \Psi(f(\alpha)).$$

**6. Functions of vanishing mean oscillation on  $\mathbf{B}^n$ .** Definition. A function  $f \in H^2(\mathbf{B}^n)$  is said to belong to BMOA if

$$\|f\|_*^2 = \sup_{\alpha \in \mathbf{B}} \int_{\partial \mathbf{B}^n} |f - f(\alpha)|^2 d\nu_\alpha$$

is finite in which case  $\|f\|_* + |f(0)|$  is a norm on the space BMOA.

DEFINITION. A function in  $H^2(\mathbf{B}^n)$  belongs to VMOA if for every  $\zeta \in \partial \mathbf{B}^n$

$$\lim_{\alpha \rightarrow \zeta} \int_{\partial \mathbf{B}^n} |f - f(\alpha)|^2 d\nu_\alpha = 0.$$

We note that

$$\begin{aligned} (15) \quad \int_{\partial \mathbf{B}^n} |f - f(\alpha)|^2 d\nu_\alpha &= \int_{\partial \mathbf{B}^n} |f|^2 d\nu_\alpha - |f(\alpha)|^2 \\ &= \int_{\partial \mathbf{B}^n} |f \circ \varphi_\alpha|^2 d\sigma - |f(\alpha)|^2. \end{aligned}$$

Since  $\text{area}(f \circ \varphi_\alpha(\mathbf{B}^n)) = \text{area}(f(\mathbf{B}^n))$  it follows from Theorem A that if  $\text{area}(f(\mathbf{B}^n))$  is finite then  $f \in \text{BMOA}$  and

$$\|f\|_*^2 \leq \frac{1}{\pi} \text{area}(f(\mathbf{B}^n)).$$

For  $\zeta \in \partial \mathbf{B}^n$  we define

$$D_{\rho, \zeta} = \{z \in \mathbf{B}^n: |1 - \langle z, \zeta \rangle| < \rho\}.$$

Our generalization of Theorem B is

**THEOREM 3.** *Suppose  $f$  is holomorphic in  $\mathbf{B}^n$  and for every  $\zeta \in \partial \mathbf{B}^n$*

$$(16) \quad \lim_{\rho \rightarrow 0} \text{area}(f(D_{\rho, \zeta})) = 0.$$

*Then  $f \in \text{VMOA}$ .*

Before giving the proof of Theorem 3 we will show how Theorem B follows from it. Since the sets  $D_{\rho, \zeta}$  form a basis for the topology at  $\zeta$  the cluster set of  $f$  at  $\zeta$  may be defined by

$$\text{cl}(f, \zeta) = \bigcap_{\rho > 0} \overline{f(D_{\rho, \zeta})}.$$



We have

$$(17) \quad \lim_{\rho \rightarrow 0} \text{area}(f(D_{\rho, \zeta})) = \text{area}\left(\bigcap_{\rho > 0} f(D_{\rho, \zeta})\right) \\ \leq \text{area}\left(\bigcap_{\rho > 0} \overline{f(D_{\rho, \zeta})}\right) = \text{area}(\text{cl}(f, \zeta)).$$

By the hypothesis of Theorem B  $\text{area}(\text{cl}(f, \zeta)) = 0$  so the hypothesis (16) of Theorem 3 is satisfied and hence  $f \in \text{VMOA}$ .

The equality in the first line of (17) follows from the dominated convergence theorem; we note that the hypothesis  $f \in H^\infty$  could be replaced by the assumption  $\text{area}(f(\mathbf{B}^n))$  is finite.

The following two lemmas will be used in the proof of Theorem 3.

LEMMA 1 (see [12, Proposition 5.1.2]). *If  $\alpha, z, \zeta \in \overline{\mathbf{B}^n}$  then*

$$(18) \quad |1 - \langle z, \zeta \rangle|^{1/2} + |1 - \langle z, \alpha \rangle|^{1/2} \geq |1 - \langle \zeta, \alpha \rangle|^{1/2}.$$

LEMMA 2. *Suppose  $\alpha \in D_{\tau, \zeta}$  with  $\tau < \rho/16$  and  $w \notin f(D_{\rho, \zeta})$ . Then there is a constant  $C$  depending only on  $\rho$  and  $n$  such that*

$$(19) \quad N(w; f, \nu_\alpha) < C(1 - |\alpha|^2)^n N(w; f, \sigma).$$

*Proof of Lemma 2.* Suppose  $\alpha \in D_{\tau, \zeta}$  and  $z \in \mathbf{B}^n \setminus D_{\rho, \zeta}$ . We deduce from (18) that  $|1 - \langle \alpha, z \rangle| > 9/16$ . Hence, by (12.b),

$$1 - |\varphi_\alpha(z)|^2 = \frac{(1 - |\alpha|^2)(1 - |z|^2)}{|1 - \langle \alpha, z \rangle|^2} < \frac{2}{9}.$$

This implies that  $|\varphi_\alpha(z)| > 7/9$ , and thus

$$(20) \quad G_{\mathbf{B}}(\varphi_\alpha(z), 0) \leq c(1 - |\varphi_\alpha(z)|)^2$$

for some constant  $c$  depending only on the dimension  $n$ .

Now suppose  $w \notin f(D_{\rho, \zeta})$ . Then by (20) and a change of variables

$$N(w; f, \nu_\alpha) = \int_{\varphi_\alpha(f^{-1}(w))} G_{\mathbf{B}}(z, 0) \beta^{n-1} \\ = \int_{f^{-1}(w)} G_{\mathbf{B}}(\varphi_\alpha(z), 0) \varphi_\alpha^* \beta^{n-1} \\ \leq c \int_{f^{-1}(w)} 1 - |\varphi_\alpha(z)|^2 \varphi_\alpha^* \beta^{n-1},$$

since  $z \in \varphi_\alpha(f^{-1}(w))$  implies  $z \notin D_{\rho, \zeta}$ .

From (12.d) we deduce the estimate

$$\varphi_\alpha^* \beta^{n-1} \leq \sup_{|I|=|J|=n-1} \left| \frac{\partial^I \varphi_\alpha}{\partial z^J} \right|^2 \beta^{n-1} \leq \frac{(1 - |\alpha|^2)^{n-1}}{|1 - \langle z, \alpha \rangle|^{4(n-1)}} \beta^{n-1}.$$

We conclude that

$$\begin{aligned} N(w; f, \nu_\alpha) &< C(1 - |\alpha|^2)^n \int_{f^{-1}(w)} (1 - |z|^2) \beta^{n-1} \\ &< C(1 - |\alpha|^2)^n N(w; f, \sigma) \end{aligned}$$

with  $C$  depending on  $n$  and  $\rho$ .

*Proof of Theorem 3.* Under the hypotheses of the Theorem it suffices (recalling (15)) to show that for each fixed  $\zeta \in \partial \mathbf{B}^n$  and  $\rho > 0$  that

$$\lim_{\alpha \rightarrow \zeta} \int_{\partial \mathbf{B}^n} |f|^2 d\nu_\alpha - |f(\alpha)|^2 \leq \frac{1}{\pi} \text{area}(f(D_{\rho, \zeta})).$$

By the Hardy-Stein identity (10) this is equivalent to

$$(21) \quad \lim_{\alpha \rightarrow \zeta} \int_{\Omega} N(w; f, \nu_\alpha) du dv \leq \frac{1}{2} \text{area}(f(D_{\rho, \zeta})).$$

Let  $\zeta$  and  $\rho$  be fixed and define  $\Omega = f(\mathbf{B}^n)$  and  $\Omega_\rho = f(D_{\rho, \zeta})$ . Let  $C$  be the constant in (19) of Lemma 2 and define a function  $h$  by

$$h(w, \alpha) = C(1 - |\alpha|^2)^n G_\Omega(w; f(0)) + G_{\Omega_\rho}(w; f(\alpha)).$$

The Green function  $G_\Omega$  is harmonic on  $\Omega \setminus \{f(0)\}$ , while  $G_{\Omega_\rho}$  is harmonic on  $\Omega_\rho \setminus \{f(\alpha)\}$  and 0 on  $\Omega \setminus \bar{\Omega}_\rho$ . It follows from Lemma 2 and the majorization principle (6) that  $N(w; f, \nu_\alpha) \leq h(w)$  on  $\Omega \setminus \bar{\Omega}_\rho$ . Since  $h$  has a logarithmic pole at  $f(\alpha)$  it now follows from the maximum principle that  $N(w; f, \nu_\alpha) \leq h(w)$  on  $\bar{\Omega}_\rho$ , and hence  $N(w; f, \nu_\alpha) \leq h(w)$  on all of  $\Omega$ .

We now have

$$\begin{aligned} \limsup_{\alpha \rightarrow \zeta} \int_{\Omega} N(w; f, \nu_\alpha) du dv &\leq \limsup_{\alpha \rightarrow \zeta} \int_{\Omega} h(w, \alpha) du dv \\ &\leq \limsup_{\alpha \rightarrow \zeta} \int_{\Omega_\rho} G_{\Omega_\rho}(w, f(\alpha)) du dv \\ &\leq \frac{1}{2} \text{area}(\Omega_\rho). \end{aligned}$$

This proves (21) as desired.

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