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The hate speech, new or well-known phenomenon?

STRESZCZENIE:

FENOMEN MOWY NIENAWIŚCI NALEŻY DO JEDNEGO Z CZĘSTO ANALIZOWANYCH W BADANIACH NAD KOMUNIKACJĄ ZJAWISK. CELEM NINIEJSZEGO ARTYKUŁU JEST PO PIERWSZE PRÓBA USYSTEMATYZOWANA ZNACZENIA ZJAWISKA JAKIM JEST MOWA NIENAWIŚCI. PO DRUGIE CELEM ARTYKUŁU JEST PRÓBA POKAZANIA, IŻ W ARGUMENTACJI ERYSTYCZNEJ (PRZY SCHOPENHAUEROWSKIM ZNACZENIU TEGOŻ TERMINU) JESTEŚMY W STANIE OKREŚLIĆ TE SAME ELEMENTY, NA KTÓRE WSKAZUJĄ BADACZE ZJAWISKA MOWY NIENAWIŚCI. PRZYKŁADEM OBECNOŚCI MOWY NIENAWIŚCI W ERYSTYCE MOŻE BYĆ TZW. ARGUMENTUM AD PERSONAM. POZWALA TO STWIERDZIĆ, ŻE FENOMEN MOWY NIENAWIŚCI W SWOICH ZAŁOŻENIACH I STRUKTURZE NIE JEST NOWYM ZJAWISKIEM PONIEWAŻ OBECNY JEST W RAMACH ARGUMENTACJI ERYSTYCZNEJ.

SŁOWA KLUCZOWE:

MOWA NIENAWIŚCI, ERYSTYKA, ARGUMENTUM AD PERSONAM, ETYKIETOWANIE, KOMUNIKACJA.

ABSTRACT:

THE HATE SPEECH BELONGS TO ONE OF CHARACTERISTIC EFFECTS IN COMMUNICATION. THE PHENOMENON OF HATE SPEECH IS NOT A TERM THAT COULD BE EASILY DEFINABLE. THE PURPOSE OF THIS ARTICLE IS TO SYSTEMATIZE THE UNDERSTANDING HATE SPEECH. AS A RESULT OF RESEARCH IT MAY BE ARGUED THAT UNDERSTANDING OF HATE SPEECH CANNOT BE NARROWED DOWN IN DISCOURSE. THE SECOND AIM OF MY PAPER IS TO SHOW THAT THE PHENOMENON OF HATE SPEECH DOES NOT IMPLY ANYTHING NEW IN COMMUNICATION. IN ERISTIC (IN SCHOPENHAUER'S UNDERSTANDING OF THAT TERM) WE ARE ABLE TO IDENTIFY THE SAME ELEMENTS, WHICH DRAWS ATTENTION IN THE HATE SPEECH. SUCH CASE FULFILLS FOR EXAMPLE IN THE USAGE OF ARGUMENTUM AD PERSONAM.

KEYWORDS:

THE HATE SPEECH, ERISTIC, ARGUMENTUM AD PERSONAM, LABELING, COMMUNICATION.

Studies on communication and language reveal many of the phenomena occurring in these areas. One very popular issue, that is present in communication studies, is the phenomenon of hate speech (further as HS). It is the subject of my interest in this article. Firstly, I would like to systematize the understanding of the HS. Secondly, I would like to explain why the analysed phenomenon is not a new structure of communication. I will try to explain it based on the presence of HS in the classic eristic argument. In the summary, I present my conclusions.

1. Defining the concept of the hate speech

An attempt to define the notion of HS presents many problems. An example of this is the Internet service <http://www.mowanienawisci.info/> (in polish language version). At <http://www.mowanienawisci.info/> it is possible to find both references to laws on HS but also specific concepts, that are associated with the notion that is analysed here. On the website you can also find examples of statements which are classified as a form of HS¹. The authors also present an example of a definition, that is the most basic understanding of HS. According to the authors the HS is: *One of the symptoms of more complex phenomena such as intolerance, discrimination, racism or xenophobia*. It is also one of the offenses called the hate crimes or the introduction or announcement of such an offense. Complement to the definition indicated above is to formulate that HS is: *an incitement to hatred, threats or insults of a racist or xenophobic motivation*².

Works on it (defining the concept of the HS) are conducted by different researchers³, which makes for the popularity of the term HS. As a result of research on various phenomena in the process of communication it may be argued that understanding of the HS cannot be narrowed down to the discriminatory discourse. It means that the HS does not confine itself only to offensive content, in which prejudices against ethnic, racial, iconic, as well as those due to the orientation or beliefs are being duplicated. The document *The Framework Decision on Combating Racism and Xenophobia* (2008) gives a more precise definition than the indicated above⁴. As opposed to the above-cited defini-

¹ <http://www.mowanienawisci.info> (access 01.02.2016 r.).

² <http://www.mowanienawisci.info/post/570/> (access 01.02.2016 r.).

³ E.g. researches were conducted on the words and deeds of hatred in the academic environment, L. R. Marcus, *Fighting Words. The Politics of Hateful Speech*, London 1996; Another example is the group work: *Words and Deeds Incitement. Hate speech & the right to free expression*. First published in 2005 revised 2006, in: <https://www.indexonensorship.org/wp-content/uploads/2015/02/v7-mid.pdf> (access 20.03.2016 r.).

⁴ [The Hate speech] *is a public exhorting to violence aimed at a group of people or individuals, that could be defined by race, skin colour, ancestry, religion, ethnicity, nationality or a world view. Moreover, hate speech is also the dissemination of written word or any other type of material that includes racist or xenophobic content, public approval or negation or blatant diminishing of the crime of genocide, crime against humanity or war crimes, according to point 6, 7 and 8 of The International Penalty Tribunal status and crimes specified in point 6 of The Cart of International Military Tribunal. If the mentioned behaviors may foment violence or engage hatred aimed at such group or its members.* <http://www.mowanienawisci.info/post/unia-europejska/> (access 01.02.2016 r.).



The effort of the rhetorical impact with important role of argument has been emphasized by Aristotle since antiquity. In his opinion, the aim of rhetoric is methodical discovery of what, in relation to each item can be persuasive. Another significant aspect is the close relationship between rhetoric with ethics. Here comes the need to preserve the truth and fairness.

tion in a document from 2008 there are additional elements such as the spreading of hatred due to the aspect of religion or the denial of the phenomena associated eg. the genocide. Thanks to this clarification the understanding of the term HS is expanded. This allows to say that you cannot narrow understanding of the analysed here term to: *acts committed on racist and xenophobic*. In their legislation, the Council of Europe pointed out that the concept of HS is not only spreading racial hatred, xenophobia and anti-Semitism. It also presents: *other forms of hatred based on intolerance*. Moreover, the legislator also pointed out that it is a form of verbal aggression against minorities, migrants and people from a migrant community⁵. What is prominent is the tendency of the European institutions to additionally classify to HS hostile behaviors, attacks and intolerance based on religion⁶.

In attempt to precise the definition of the HS an important voice seem to have been a research carried out in 2014. It's results were included in the report *Hate Speech Alert – against hate speech in public space*. The authors believe that until the test is performed (the results were published in 2015) there cannot be given one precise definition of what HS is. The scientists conducting the research emphasize that the attempt to define the term HS allows you to place it: *within the discourse associated with intolerance, discrimination, racism or xenophobia*⁷.

In the research about the presence of elements of hate authors referred to the phenomena that may have destructive consequences in terms of calling for hate, most of all

⁵ R. Wieruszewski, M. Wyrzykowski, A. Bodnar, A. Gliszczynska-Grabias (red.), *Mowa nienawiści a wolność słowa. Aspekty prawne i społeczne*, Warszawa 2010, p. 13.

⁶ <http://www.mowanienawisci.info/post/unia-europejska/> (access 01.02.2016 r.).

⁷ A. Bulandra, J. Kościółek, M. Zimnoch (red.), *Mowa nienawiści w przestrzeni publicznej. Raport z badań prasy w 2014 r.*, (without date of publication), <http://www.mowanienawisci.info/wp-content/uploads/2015/10/Mowa-nienawi%C5%9Bci-w-przestrzeni-publicznej.-Raport-z-bada%C5%84-prasy-w-2014-roku-1.pdf> (access 02.02. 2016 r.).

with racial and ethnic motivation. The study included destructive statements contained in articles relating to Islam and Muslims, Jews and sexual minorities⁸. The authors also stress that despite the specifically chosen control group, the HS may also apply to insults generally spoken in public and to be associated with *the language of hatred [...] or discriminatory discourse*⁹. The last inspiration also allows to expand the understanding of what really the HS is. The mentioned findings allow to confirm an imprecision of what the HS is. Secondly, they expand the eligibility of expression classified to the category of hateful. This group includes statements well-known in a classic argument, especially (in defined meaning of the term) in eristic.

2. The hate speech in eristic

Above research allows me to say that the phenomenon of the HS is ambiguous. It means that it is very difficult to specify one meaning of the term of HS. It is impossible to narrow down the understanding of the HS in a discourse. The scientific research allows me also to assume that the structure of the HS it is nothing new. It is nothing new to emphasize the features, attributes, qualities of opponent (as in the case of the HS) that do not involve merit argument in communication. In order to explain this phenomenon I will try to draw attention to the difference between rhetoric and eristic.

The effort of the rhetorical impact with important role of argument has been emphasized by Aristotle since antiquity¹⁰. In his opinion, the aim of rhetoric is methodical discovery of what, in relation to each item can be persuasive¹¹. Another significant aspect is the close relationship between rhetoric with ethics. Here comes the need to preserve the truth and fairness¹². This does not exclude, of course, the persuasive nature of the rhetoric. Nevertheless the specific and interpersonal nature of the persuasion and a logical dexterity of the speaker may not be in conflict with honesty¹³. The approach distinguishes rhetoric from eristic. I here presume Schopenhauer's understanding of eristic¹⁴. I understand eristic as an art, which with the help of all permitted and prohibited methods is discussed, in order to keep up appearances regardless of substantive arguments. The quiddity of eristic is a fight of words at any cost and as a result, defeating the

⁸ Ibidem.

⁹ Ibidem.

¹⁰ Aristotle, *Rhetoric I, A Commentary*, William M. A. Grimaldi, S.J., New York 1980, p. 21; 33-34; 69.

¹¹ *They are the elements present in the subject which will carry conviction to this auditor and "which rhetoric is to discover in each and every subject.* Aristotle, *Rhetoric I, A Commentary*, p. 94.

¹² B. Sobczak (red.), *Retoryka i etyka*, Poznań 2009, p. 12; M. Korolko, *Sztuka retoryki. Przewodnik Encyklopedyczny*, Warszawa 1990, p. 35.

¹³ M. Korolko, *Sztuka retoryki*, p. 29-30.

¹⁴ *Accordingly, in a dialectical contest we must put objective truth aside, or, rather, we must regard it as an accidental circumstance, and look only to the defence of our own position and the refutation of our opponent's.* A. Schopenhauer, *Die Kunst, Recht zu behalten - The Art Of Controversy*, in:

<http://coolhaus.de/art-of-controversy/eristii.htm> (access 29.03.2016 r.).



The argumentum *ad odium* is also called *ad invidiam*. It is one of the arguments referring to hatred. It is about a hatred of a recipient (presented justification) towards a person or people. Using the existing hatred and prejudice it is easy to receive acceptance of the presented statements containing the negative assessment of constituting the object of strong negative feelings.

opponent, instead reaching truth and probability¹⁵. Eristic arguments are not directed to things, but to the human person. Emphasizing the features, attributes, qualities of opponent (exactly as in HS) in communication, it is possible to defeat an opponent. Eristic could have the hallmarks of the HS. One of the examples of eristic is an *argumentum ad personam* (further as AP). Following I will present a reference to AP, pointing out that it is possible to find in it the same elements as in HS.

2a *Argumentum ad personam* as the form of hate speech

In AP there is an indication of the features that are irrelevant to the argument presented. Such thing can be observed in the sentence: *Einstein's relativity theory is false, because Einstein is a Jew*¹⁶. The quoted argument taken from a Nazi propaganda is a flagship example of the AP. The thesis related to the fact that the famous physicist is a particular nationality in the indicated argument did not affect his work in the field of his research.

You may notice that the attack of the AP often completely discounts the essence of the controversy, a dispute which is pending. Therefore, there is no substantive value¹⁷. As noted by K. Szymanek so-called AP is one of the most commonly used unconstructive moves in the discussion. The aim of the so-constructed speech is a personal verbal attack on opponent. It is focused on uttering abusive or disrespectful comments to insult the opponent¹⁸. Such an understanding of the AP can most certainly qualify them as HS. All of expressions constructed in AP aims to give the impression that the views of a person

¹⁵ For Schopenhauer eristic have no objective truth in view, but only the appearance of it, and pay no regard to truth itself because it aims at victory. A. Schopenhauer, *Die Kunst, Recht zu behalten - The Art Of Controversy*, in: <http://coolhaus.de/art-of-controversy/eristii.htm> (access 29.03.2016 r.).

¹⁶ K. Szymanek, *Sztuka argumentacji. Słownik Terminologiczny*, Warszawa 2001, p. 55.

¹⁷ Ibidem, p. 52.

¹⁸ Ibidem.

must be false because it has been represented by one of the indicated traits or certain appearance¹⁹.

Even though many researchers have determined the AP as the apparent form of argument, due to lack of characteristic features of argument such as interconnected logic evidence of completed application, it draws attention to the effectiveness of this form of presenting ideas²⁰. Certainly, the AP is only an apparent argument in which the attention is not focused on what the subject of the conversation is but the necessity of winning in the dispute. AP is thus a form of eristic justifying statements. Attacks and hostile references carried out in AP enable to qualify for this form of argument as HS.

2b *Argumentum ad personam* as an example of communication *ad odium*

The *argumentum ad odium* is also called *ad invidiam*²¹. It is one of the arguments referring to hatred. It is about a hatred of a recipient (presented justification) towards a person or people. Using the existing hatred and prejudice it is easy to receive acceptance of the presented statements containing the negative assessment of constituting the object of strong negative feelings²². An example of this form of argument is the sentence: *Judges do not pay heed to the evidence - just look at the man's face, the face of a psychopath and the mentally ill man*²³. The analysis of expression in the *Słownik Terminologiczny* gives examples of other sentences, as examples of AP such as: *You're closed-minded hypocrite, because you'll never understand my arguments or Your arguments are simple, even boorish*²⁴. There is no substantive reference to the specific arguments, however, it is possible to specify examples of pointless arguments relating to specific individuals such as: a *mentally limited* or *simpleton*. In this way the attack is aimed not aimed at the subject of the dispute but at the person who is involved in the dispute (there is no reference to the merits of the case).

In the context of the AP it should be emphasized that appears a fight against someone's statements and arguments by pointing out the their specific characteristics. In a case like this one there may occur a fight against someone else's arguments by reference to its worldview, or her profession or gender. In the so-constructed arguments one attacks someone else in a way that is personal, abusive or rude²⁵. The technique of personal attack may apply to: *the morality* of our interlocutor, *his name, appearance, his family behavior during the interview or mental health*²⁶. According to Schopenhauer this is a rule that is used willingly, because everyone is able to use it; so it is used very often²⁷.

¹⁹ M. Kochan, *Pojedynek na słowa. Techniki erystyczne w publicznych sporach*, Kraków 2005, pp. 204-215.

²⁰ K. Szymanek, pp. 52-53.

²¹ Ibidem, p. 59.

²² Ibidem, p. 58.

²³ Ibidem.

²⁴ Ibidem, p. 54.

²⁵ A. Budzyńska-Daca, J. Kwosek, p. 171.

²⁶ M. Kochan, p. 206.

²⁷ A. Schopenhauer, *Erystyka czyli o sztuce prowadzenia sporów*, Warszawa, pp. 108-109.



I understand eristic as an art, which with the help of all permitted and prohibited methods is discussed, in order to keep up appearances regardless of substantive arguments. The quiddity of eristic is a fight of words at any cost and as a result, defeating the opponent, instead reaching truth and probability.

Without a doubt it can be concluded that the AP is an example of the HS (the purpose and nature of this statement determines it).

It is possible to draw attention to the AP as a form of the HS (through goals that are realized in this argument). Attacking the opponent during the discussion makes it difficult for him to present his own position. This form of expression (AP) is also a way of exerting psychological pressure. With AP a person attacked instinctively begins to defend. The process that takes place here is called date-drenched opponent in the eyes of the audience. Therefore language is here most certainly the building tool of discrimination as referred to in the definition of the HS²⁸. It is also compatible with the observations of HS that is spoken in public insults²⁹.

The justification for the thesis which states that the AP is a manifestation of the HS is not only that this type of arguments is part of the so-called hateful category concepts within the statements of *ad odium*. In the public space there are several ongoing discussions in which there are many examples of AP used as language of hatred such as insults and other forms of verbal aggression. These statements are not inspired by elements of racial or ethnic exclusion. However, they remain offensive to certain individuals because of their beliefs and positions. The confirmation of this thesis are well known statements spoken by Polish politician who publicly expressed his opinion on his political ally using the following sentence: *It is commonly known that he is an old fart. He is both funny and tragic*³⁰. In the quoted passage there is no substantive dispute. A phrase addressed to a specific person suddenly appears in the speech in which he is named in an offensive way.

Another example of using AP as an example of HS in the public space is to referring to a political opponent with terms such as: *sucker*, *man spiritual emptiness*, *the to-*

²⁸ A. Bulandra, J. Kościółek, M. Zimnoch (red.), *Mowa nienawiści w przestrzeni publicznej. Raport z badań prasy w 2014 r.*

²⁹ Ibidem.

³⁰ *Kulisy Platformy. Z Januszem Palikotem rozmawia Anna Wojciechowska*, Warszawa 2011, p. 87.

tal plastic, small-minded man. There is little substantive reference to those presented by the attacked opponent. However, various forms of verbal aggression are encountered³¹.

Another example of the AP breaking the rules of decency and becoming a form of verbal aggression can be observed on the site <http://www.se.pl>. One of the politicians in listed quotations expressed his views on the President of the Republic of Poland using several expressions such as: *insincere, artificial, silly, I do not know what he wants simply insulting the Head of State*. The same man called another political opponent a *boor, lump* and *political hooligan*³². Quoted statements most certainly are not substantive reference to the views or ideas presented by the people to whom they are addressed. These statements are characterized by hostility and aggression. Even though cited statements are not inspired by racial, ethnic or cultural differences, they remain a manifestation of hatred, because they attack a different way of thinking, different ways of implementing the policy, different priorities in decision-making, etc.

An interesting manifestation of hate speech are comments branding someone due to religion or belief professed. This understanding is suggested in the definition proposed in one of the EU directives³³. An example of such an attack, which also meets the criteria for AP, may be statements like, *Rydzik is terrible ignoramus [...]. It is limited, dull man. It is simply a political hooligan, not any of the Father*³⁴. The article *Licencja na opluwanie* directly specified that the statements about religious life (whether general or targeted at individuals) are manifestations of the HS. The author also points out that you cannot take possession of the notion the HS, because in this case (violations of freedom of religious beliefs), the use of the expression is the most appropriate³⁵.

2c *Argumentum ad personam* as a tool of labeling opponent

The structure of the AP cannot be classified as the HS only by uttering phrases abusive or hostile (it may be one of the conditions). It can also serve to disseminate the HS in communication. I believe that the HS is also associated with labeling. It is important that by using arguments set to occur in the process of labeling the opponent. The idea is to introduce permanent concepts or expressions into the political discourse or social specific³⁶.

³¹ *The question itself sounds like a joke. Napieralski is an uncommon level of naiveté and spiritual emptiness. He seems overall plastic, fake, like a man of narrow vision. If anyone similar to Napieralski ever becomes a Polish prime minister, it will mean that we as a nation cannot get our mind around. Kuliszy Platformy*, p. 133.

³² *Najbardziej obraźliwe wypowiedzi polityków w 2015 roku* from 26.12.2015 r., [http://www.se.pl/wiadomosci/po lityka/najbardziej-obraziwe-wypowiedzi-politykow-w-2015-roku_753766.html](http://www.se.pl/wiadomosci/po%20lityka/najbardziej-obraziwe-wypowiedzi-politykow-w-2015-roku_753766.html) (access 02.02.2016 r.).

³³ <http://www.mowanienawisci.info/post/unia-europejska/> (access 01.02.2016 r.).

³⁴ K. Baranowska, *Licencja na opluwanie*, „Tygodnik Lisieckiego. Do Rzeczy”, 13-19.05.2013, p. 19.

³⁵ *Ibidem*.

³⁶ I understand discourse as a communication event, where by the language people communicate different ideas, express their emotions. I. Jakubowska-Branicka, *O dogmatycznych narracjach. Studium nienawiści*, Warszawa 2013, p. 31.

It is not important at this point to decide whether the language is used to describe reality or if it creates the world around us. However, I would refer here to the concept of symbolic interactionism. The essence of this concept is that the words define reality, give it meaning. In this conception different meanings of our language are created and consequently used by individuals.

Assuming that the language encodes reality and gives it a specific meaning prof. Jakubowska-Branicka studied the language of totalitarian systems referring to a concept of symbolic interactionism. Her research concerned the concept of transmitting meaning with words (creating, constructing in this way, a specific reality)³⁷. In popular culture and communication, constantly comes to creating (by language) specific meanings³⁸. What is important is that the meaning of individual items comes from how things are defined³⁹.

In reference to the symbolic interactionism it should be noted that the communication in order to define and interpret (transmit meanings) the man speaking organizes the reality that surrounds him. In this way, a certain stock of knowledge, through which subjects create ways of understanding reality⁴⁰. It is also pointed out that word has a particular ability in the creation of reality⁴¹.

The role of language in the system of interpretation of the world and giving meanings may (be able to) condition (influence) human action⁴². Indicated here the role of language is conducive to what is referred to as labeling. Use of language starts an action of a symbolic nature. Determining someone using language as: *man, woman, philanthropist, doctor* or an *athlete* put the emphasis on one of his special features, keeping in mind that it is only one of the descriptive features for this particular individual. In this way, language is involved in the fragmentation of the reality around us. This is a very important phenomenon because it allows (by calling or defining), the organization of the reality around a given term⁴³.

The creation of meaning takes place also in the HS. Only analysing the labeling or creation of meanings within the HS, it seems that the phenomenon of aggression within the AP may promote the dissemination of offensive language. Defamatory individuals within the terms of the AP relate to certain people and permanently find their place in the public discourse. Thus for example some priests are referred to as: *fiend from Torun*

³⁷ Ibidem, pp. 25-28.

³⁸ Conception of the symbolic interactionism derives from the observations of the popular culture conducted by the American sociologist Herbert Blumer. H. Blumer, *Interakcjonizm symboliczny. Perspektywa i metoda*, Kraków 2007; E. Hałas, *Znanięcki jako prekursor symbolicznego interakcjonizmu*, in: E. Hałas, *Znaczenia i wartości społeczne. O socjologii Floriana Znanięckiego*, Lublin 1991, pp. 55-73; E. Hałas, *Interakcjonizm symboliczny. Społeczny kontekst znaczeń. Wydanie nowe*, Warszawa 2006.

³⁹ I. Jakubowska-Branicka, pp. 14-15.

⁴⁰ Ibidem, p. 19.

⁴¹ Ibidem, p. 25.

⁴² Ibidem, p. 27.

⁴³ Ibidem, p. 28.

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or *Satan*⁴⁴. Certain words are being distributed to determine politicians, like *the boor*, *an alcoholic*, *little shrimp*, *jerk*, *crackpot*, a *psychopath*, a *Russian agent*, etc...⁴⁵. Often, specific definitions of permanently define the person. These measure consequently causes promoting of the AP that label the opponent. The vulgarity of these terms causes me to include them to the HS.

Conclusion

In my paper I wanted to achieve two basic goals. Firstly, I wanted to clarify the meaning of the term of the HS. Secondly, I wanted to show that the HS it is not a new structure in communication

In reference to the first case it should be emphasized that the term HS it is not simple to define. Despite this, there are still attempts to clarify the phenomenon of this term. The safe procedure would be to create something like a set of meanings, which will be applied to the expression of the HS. This procedure was initially created by authors of <http://www.mowanienawisci.info/> service. Despite the attempts to clarify the term, its meaning is still unclear. It seems that you cannot narrow understanding of this phenomenon only to content related intolerance, discrimination, racism or xenophobia. An important element here is also a reference to the hostility associated with religious intolerance or even the use of vulgar or offensive terms in public discourse.

In reference to the second case I wanted to explain that analysed phenomenon of the HS is not a new structure in communication. In my opinion in eristic (in the Schopenhauer's meaning of this term) it is possible to find the same elements, that are used in HS. For example in *argumentum ad personam* can be indicated functioning of the same elements like in HS.

Presented references to the HS in the article aim to ultimately help in the understanding of this term. This does not mean that it will be clear and easily understandable. However, performed in the article analysis is an attempt to prevent narrowing the term of the HS in communication. ■

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⁴⁴ K. Baranowska, p. 18.

⁴⁵ Ibidem .

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