

# Book and article reviews

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## BOOK AND ARTICLE REVIEWS

Michael Schudson. *The Sociology of News*. New York, 2003: W. W. Norton & Company.

Whenever something seems to go awry in political and economic developments, one scapegoat is readily identified: the media. When, after a surprisingly short war in 2003, the occupation of Iraq by American troops became bloody and no weapons of mass destruction were found, pundits and media studies scholars were quick to blame the press for public misperceptions about the war in Iraq. «Now they tell us», Michael Massing, contributing editor of the «Columbia Journalism Review», famously lamented in «The New York Review of Books.» He disparaged American journalists for having overstressed the dangers of weapons of mass destruction before the war. And he lambasted them for coming clean about their fatal flaws only after the «quagmire» in Iraq had become all too obvious<sup>1</sup>.

Throughout 2003 and 2004, a heated debate arose - not over whether journalists had misled the American public into war, but over how and why they did it. In their fervor to find a culprit, the critics of the press didn't bother to ponder the finer mechanisms of media effects. However, writing in the «International Journal of Public Opinion Research» in 2004, Douglas Foyle found that in the months leading to the war in Iraq, American public opinion stayed unimpressed by the allegations of weapons of mass destruction in Iraq.

A majority of Americans, albeit a small one, supported the war against Saddam Hussein anyway<sup>2</sup>.

To what extent the press is to be held accountable for forming public opinion is an unresolved issue for the time being. Nevertheless, one has to keep in mind that the notion of powerful media is convenient to the interested parties involved: To the journalists because it makes them seem important, to journalism scholars because it makes their field of research seem important and gives them ample opportunity to appear on TV and become heard outside the ivory tower. In other words: There are strong incentives to uphold the hypothesis of strong media effects. And that's probably why they persevere. Readers of Michael Schudson's latest book «The Sociology of News,» however, already know quite well that the claim of strong media effects is an oversimplification at best, a downright myth at worst.

Schudson, a professor of communication and adjunct professor of sociology at the University of California in San Diego for some 25 years, is suspicious of claims of media power ever since he researched and wrote «Advertising, the Uneasy Persuasion» (1984), where he came to the conclusion that «advertising is much less powerful than advertisers and critics of advertising claim». To Schudson, the same is true for the press and the media in general: it's not power itself but an «illusion of power» (p. 19). Reappearing themes in his work are cases where conventional wisdom has come to the conclusion, that media single-handedly dictated political and economic developments, for better or worse. Re-

ferring to his own research and that of others, Schudson has shown that it was not TV that turned public opinion against the engagement of American forces in Vietnam. On the contrary: The networks and the press were late in recognizing that the public's sentiment had turned against the war since long. Schudson also is critical about the notion of the Watergate scandal being primarily the consequence of courageous reporting by «Washington Post» journalists Bob Woodward and Carl Bernstein. He demonstrates that only complex interactions of prosecutors, judges, politicians, and journalists with their often contrarian interests eventually led to the unearthing of the machinations in Richard Nixon's White House.

Schudson writes about the politics and news that they were «so thoroughly engaged in a complex dance with each other that it is not easy to distinguish where one begins and the other leaves off» (p. 154). This sentence elegantly describes how Schudson sees the relationship between all societal forces and the media. Throughout the book Schudson warns his readers and all students of communication to rely on simple models of how the media function.

The book reiterates Schudson's research, deepens and exemplifies it. But Schudson also discusses current findings and objections to his conclusions by dissenting scholars. Students of communications and media sociology - who could be intimidated by heavy textbooks - have before them an engagingly written, easily digestible, and thought-provoking introduction into the field, concentrated in a handy tome.

«The Sociology of the News» sums up a lifetime of insights into media effects, journalism history, the process of «news making», its structures, practices and codes. Eventually, Schudson also describes the press as an indispensable institution of modern democracy. On the way, he does not conceal open questions, nor does he give easy answers. But he delivers a comprehensive account of what constitutes media in the context of modern societies.

<sup>1</sup> Massing, M. (2004): Now They Tell Us. *The New York Review of Books* 51/3:1-22.

<sup>2</sup> Foyle, D. C. (2004) Leading the Public to War? The Influence Of American Public Opinion On the Bush Administration's Decision to go to War in Iraq. *International Journal of Public Opinion*. 16/3: 269-294.

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Paul Starr. *The Creation of the Media. Political Origins of Modern Communications*. New York, 2004: Basic Books.

How American Media Became Powerful-Media, Markets, and «Constitutional Choices»

Nowadays, Commercialization, concentration, and monopolization of modern mass media seem to be constantly discussed by the public and the academia alike. Eminent American scholars as Noam Chomsky and

Robert McChesney offer dire predictions on the debilitating effects of media concentration on the public sphere and democracy itself. The warnings are debated passionately on both sides of the Atlantic. Based on the thinking of Theodor Adorno and Jürgen Habermas, there is a strong sentiment against a basically unregulated, capitalist approach to the creation and expansion of mass media. The topic gets all the more attention regarding the emerging democracies of the former Soviet bloc, in Asia, and - a surprising new development - in the Middle East. Wherever people's rule overcomes totalitarian regimes of all flavors, the question arises what journalism can do to foster and educate a mature citizenry - or how market-oriented and business-dominated mass media are dangerous to open societies in emerging democracies as well as in long established democratic nation-states.

These are important issues, and research in journalism and communications forms new insights into the topic on an almost daily basis. What is somewhat lacking, however, (and at the same time potentially helpful in the ongoing discussion) is a thorough investigation of the historical backgrounds of the development of mass media: What emerging democracies plagues today is what established democracies experienced long ago while they were emerging. And the institutional frameworks that helped shape modern democratic societies could be models for today's nation building efforts.

In «The Creation of the Media - Political Origins of Modern Communication» Paul Starr, Professor of Sociol-

ogy at Princeton University, does not give any recipes for dealing with these issues. In fact, his book lacks any reference to the ongoing discussion about them. Starr delivers, however, a thorough investigation into the development of the US media from the days of the American Revolution until World War II. Starr's portrayal of this evolution is accompanied by comparative views on the parallels in Europe. On his comprehensively and deeply researched travel through time, Starr shatters dearly held beliefs about how the market system - and only the market system - was able to establish the rich media environment of today's USA and the worldwide dominance of American media. On the other hand, Starr also gives the market forces their share of credit, where credit is due. In Starr's narrative, the economic powers condemned by the likes of Chomsky and Adorno are as important to innovation in the media content and media distribution as exactly this innovation is functional to a free society.

Being a sociologist whose most regarded earlier book is about the American health care system (*The Social Transformation of American Medicine*, 1982) Starr is mostly interested in the societal and political institutions, which form the framework for any development, in this case for the development of modern mass media. Starr argues, that «the structure of the media [...] resulted from constitutive choices» (p. 388). Mostly politicians made these choices at defining moments in history, and they made them «in the context of three overarching realities: the primacy of the nation-state, the emergence of liberal consti-

tutionalism, and the expansion of the reading public and other cultural markets» (p. 389-389). «The power of the modern media,» Starr concludes, «is a byproduct of decisions made in the context of these developments as they played out in different societies» (p. 389). Starr convincingly illustrates his central thesis with a surprising interpretation of the making of the American Constitution. The Founding Fathers took a direct hand in shaping communications. In order to promote free speech and political deliberation in a vast, continent-wide nation, they promoted communication in a broad sense. They nationalized the mail system through the US Post Office. The Post Office in turn was used to subsidize the press through cheap delivery. Early on, the Government also promoted alphabetization through mandatory school instruction. In the end, these «constitutional choices» created a huge and profitable market for information where newspapers were inexpensively delivered to an ever growing audience of readers - a process that made the newspapers (through mass production and advertising) evermore cheaper and consequently evermore widespread throughout the public.

In contrast to conventional wisdom, the United States nurtured its media industry not only by letting market forces go to work, but, Starr argues, by framing the market in a way that appears to be almost socialist: nationalizing an industry, subsidizing another and imposing restrictions of freedom on its citizens. Intended or not, these decisions and developments led to an early advantage of the American media. As Starr shows, America's leading

position in today's worldwide media market is not simply a result of its economic, political, and military dominance. America was already a leader in communications when it had none of the other advantages. This pattern of early leadership and persistent commanding lead, Starr writes, «stems fundamentally from constitutive, political decisions that led the United States from its founding on to a course sharply diverging from the patterns in Britain [and] elsewhere in Europe» (p. 3). Starr finds and shows traces of these political decisions throughout the American history of communications, from the development of the telegraph and telephone to the movies, broadcasting and even the Internet, which was initially created and funded by the US government.

While Starr is mostly sympathetic towards the impact of the state on the development of media markets, he does not necessarily share the dark suspicions held by critics of market driven media. Mentioning European academics Adorno and Habermas by name, Starr calls their critical theory «a cartoon of culture» (p. 400). The Frankfurt school objected the conversion of the public into «mere media markets», Starr dryly observes, «as if printers had not been producing for the marketplace ever since Gutenberg» (p. 401). To Starr, the advantage of the market system outweighs by far its drawbacks. Since only the risk-taking approach of market-driven media can guarantee innovation, markets «make vital contributions to a democratic public sphere that are unlikely to be made any other way» (p. 401). The growth of markets, Starr argues

further, does not «extinguish noncommercial interests in culture and public life. The market, even when its products are distasteful, is a continual stimulus to innovation outside the market and in reaction to it» (p. 401). The public life, Starr concludes, is «a hybrid of capitalism and democracy» (p. 402). To him, the two form a system of checks and balances. In this system democratic institutions must eventually be able to control the balance.

On the 484 pages of this tome the reader finds a wealth of information about the history of communication, densely but clearly laid out, intriguingly narrated, and forcefully debated. But since Starr's story basically ends in 1941 - the year America entered the war - questions arise: What can it all tell us about the present? What conclusions do we have to draw from how Starr tells the history of communication? And: How do we have to act in order to create or preserve democracies? «The Creation of the Media» gives no single, lucid, and intelligible answer to these questions. But it reminds us that the development of a public sphere is not a nature-given process. It is the product of deliberate choices about institutions. These decisions may not always have the intended consequences. But still they are decisions, made by citizens and politicians - no dark forces, not even market forces, are to blame.

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Vergaro, Carla. "Dear Sirs, what would you do if you were in our position?". Discourse strategies in Italian and English money chasing letters. *Journal of Pragmatics* 34, 2002: 1211-1233.

This article presents the results of a research conducted in order to implement software created to construct commercial letters: CBT Business Letter Tutor.

Far from being a merely technical report on the findings related to the implementation, this paper offers interesting suggestions in an intercultural perspective.

CBT Business Letter Tutor itself had been created not only for the purpose of letter writing in specific contexts, but also to offer a tool for the contrastive analysis of two or more natural languages. This analysis was meant to be conducted in particular on the possible ways to perform the same speech acts in different languages, and in different cultures. The specific case presented in this article is that of the creation of money chasing letters.

The author presents the results of one of the phases in the implementation, that is the one in which a contrastive analysis of the rhetorical strategies (in a broad sense) in English and Italian money chasing letters had been conducted. The corpus analyzed consisted of 36 English letters and 21 Italian ones, actually used to demand payment of invoices.

The working hypothesis assumed throughout the research was to consider the commercial letter as a specific textual type, and the money chasing letter as a "subtype" of the commercial

letter. The question to be answered was how far cultural differences could actually influence the ways in which such a standardized and predictable text type would be written. The letters are analyzed both at the level of macro and of micro structures. At the macro structures level, attention is focused on the textual moves, conceived of as "meaningful units represented in linguistic forms and related to the communicative purposes of the activity in which members of the community are engaged". At the micro structures level, instead, importance is given to the elements of the discourse (pronouns, mood and modality, and metadiscoursal elements, intended as textual elements whose primary function is to make a contribution to the processing of the text) and to the relations between them.

The results obtained from such an analysis are noteworthy both from an intercultural and an educational point of view.

Starting from the macro structures, the research reveals great differences from the point of view of the number, type and frequency of the textual moves. Where the Italians are much more synthetic and to the point, requiring quite a lot of inference from the reader, the English tend to use a larger variety of moves, and are more detailed and specific. The English seem to have a tendency towards letters which are reader oriented and which tend to level the inequality between the interlocutors in order to make it easier to arrive at a solution of the problem. On the other hand, Italians are more likely to compose somewhat cryptic letters, much less preoccupied with a reader friendly

attitude. An example of this difference is in the fact that English letters often abound in explanations on payment modalities, whereas Italian letters explicit only what is strictly necessary for the felicity of the communication. Payment procedures are mostly left unexpressed.

These differences at the macro structural level are seen as completely dependent from the culture in which the letters are written. A money chasing letter of the English kind would probably sound excessively fussy and if not a bit hypocritical to an Italian. Vice versa, the Italian letter kind would be too formal and bureaucratic for an English addressee.

The results from the analysis of the micro structures confirm the ones obtained at the macro structural level; metadiscursive elements instead were not enough to justify an analysis in a cultural perspective.

In the last part of the article the author shows how these results have been used for the implementation of CBT Business Letter Tutor, explaining how they can help in the selection of the most adequate type of letter according to the context in which it will be used.

The research presented in this paper offers an interesting example of how observations in intercultural perspective can be made starting from very basic and "technical" needs. It also shows how observations of this kind can have useful applications in language teaching, because language has to be considered as a means to achieve a specific end in a very precise context and through quite a fixed medium. This makes it necessary to take into consideration all the possible factors

that might influence in one way or the other the communication: among these the cultural context, which might be difficult to define per se but thanks to an analysis of this kind can be described at least in some of its peculiar traits.

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Di Fraia, Guido. *Storie Con-Fuse: Pensiero narrative, sociologia e media*. Milan, 2004: Franco Angeli.

Perhaps the most striking feature of the various narrative approaches to social science research is that, despite their disparate points of origin in various disciplines, they tend to converge on similar concepts, themes and models. Such convergences offer multidisciplinary support for the central characteristics of narratives, and the validity of the methodology in addressing the problems of interest to social scientists. *Storie Con-Fuse: Pensiero narrative, sociologia e media*, by Guido Di Fraia, has its roots primarily in social and cognitive psychology, yet it shares much common ground with similar works originating in discourse analysis and linguistics, history, and political sociology. Readers unfamiliar with narrative theory need not be concerned, as the author carefully guides them through the thicket of different epistemological traditions that contribute to his argument. He covers a great deal of ground for such a slim volume, deftly panning outward from the role of narrative at the level of in-

dividual cognition to its applicability to broad sociological questions.

Di Fraia builds a strong case for a "socio-narrative" school of sociology, constructing an argument that begins with theories of cognitive processing and mental maps, expands into narratology and discourse analysis, suggests that identity is essentially a narrative construct, and concludes with a model of narrative sociology in which the media occupy a central function in creating many of the stories that shape our individual and cultural identities.

Considerable space is dedicated to tracing the history of narrative perspectives in sociology, and arguments supporting its adoption as the central paradigm. Only scholars steeped in the most empirical of traditions will learn much that is new from this account; However, given that the study of communication continues to be strongly influenced by economic models, such arguments are still necessary in any volume intended for a broad readership across the social sciences.

Noticeably absent is any reference to the most important scholarship on framing. The author's emphasis on received narratives is unsurprising, given that his model rests broadly on cognitive theories, but the frames employed in narrative production are surely of equal importance from a media-sociological perspective. In addition to the brief mention of agenda setting, citing the work of Iyengar, Entman, and others could have produced an even more powerful portrayal of how narratives structure communicative interaction at every level.

Minor weaknesses aside, the book offers an excellent introduction to narrative theories from a cognitive and sociological perspective, and proposes a conceptual model that promises to be a useful tool even for those already familiar with narrative scholarship. The chapter on how narrative shapes personal and collective identity opens up fascinating possibilities for social scientific investigation across a number of disciplines. Finally, Di Fraia effectively points out the inability of traditional media effects research to probe the complexity accessible instead through narrative, and paints a convincing portrait of culture as consisting of intersecting and overlapping stories. Written in an engaging and approachable style, it is an enjoyable and productive read for anyone wishing to understand and explore how stories shape our individual and collective experiences and our communication landscape.

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Frans H. Van Eemeren and Rob Grootendorst. *A systematic theory of Argumentation*. Cambridge, 2004: Cambridge University Press: pp. 216.

Dedicated to Rob Grootendorst's widow to celebrate the memory of the co-author of the Pragma-Dialectical theory, this book offers a general and systematic overview of the ideas Rob contributed to develop in a comprehensive approach to argumentation. The "final report" of the studies car-

ried out during his collaboration with Frans van Eemeren is meant to be a thorough insight in the methodological, philosophical and theoretical fundamentals of Pragma-Dialectics, providing an useful instrument to clearly understand the basilar aspects of this prospective on argumentation.

The book is articulated in seven sections, presenting the analytical model of a critical discussion in the frame of the realm of the argumentation studies, discussing the multi-dimensional approach to relevance and the process of discourse reconstruction based on it, explaining the discussion procedure grounded in fifteen dialogical rules and the normative study of fallacies.

The whole theory is analyzed starting from the definition of argumentation as the process and the product of a "verbal, social and rational activity aimed at convincing a reasonable critic of the acceptability of a standpoint". This description efficaciously summarizes the crucial points of Pragma-Dialectics, defining the position of the critical approach to argumentation among the main philosophical and theoretical currents. To geometrical, or logical, and anthropological, or culture-bound ideals of reasonableness is, in fact, opposed a critical and dialectical perspective, based on a set of rules acceptable to the parties involved in the discussion. Validity is therefore considered inter-subjectively, being founded on the notion of acceptability encompassing the criticized subjective and logical criteria, respectively based on relative and universal rules. The clash with the two main meta-theoretical starting points is reflected on the theoretical studies, presented as alternative to the epis-

temo-rhetorical position. In fact, while the latter is focused on a concept of reasonableness founded on the efficaciousness of the discourse in persuading, each argumentation, in pragma-dialectical view, is regarded as a part of an implicit or explicit discussion aimed at resolving a difference of opinion. The theoretical premises lead to an analytical reconstruction of the discussion as a succession of phases and speech acts directed to a resolution-oriented aim, sensibly differing from persuasion-oriented analysis focused on the rhetorical devices used to persuade an audience. The contrast between the two models of reconstruction is reflected on the empirical descriptions, concentrated in the latter theory on the rhetorical process of persuading, opposed to the dialectical process of convincing. The last point of view under which argumentative studies can be considered is the practical estate: in this field the applications of the epistemo-rhetorical theories are developed toward success-driven goals, while in the pragma-dialectical approach the attitude leading the practical research is furthering reflection on argumentation. In the Pragma-Dialectics, to sum up, the critical philosophical position meets empirical research, oriented towards the process of convincing, in an analytical estate based on a theoretical perspective aimed at resolving a conflict of opinions.

After defining the role and the position of the argumentative theory, the dialectical model is presented starting from its methodological basis, grounded in four principles: functionalizing, externalizing, socializing and dialectifying. Discussion is consid-

ered, for these reasons, a purposive (functional) activity, whose analysis should be focused on the public commitments and the interaction the language activity itself creates, aimed at resolving a difference of opinion in accordance with norms of reasonableness. Verbal expressions in an argumentative discourse are therefore studied as speech acts, directed at determinate purposes and creating public commitments or obligations between the interlocutors. Commitments are, on the other hand, partially determined by the specific roles the parties involved in the discussion play, according to the positions they assume in respect of the standpoints advanced. Argumentation is ruled by a set of norms that have to be respected in performing the speech acts, norms that constitute an argumentative procedure structuring the discussion into a model organized in the four phases of confrontation, opening, argumentation and conclusion. In the confrontation stage, the difference of opinion is established; successively in the opening stage the parties identify a common ground, a set of proposition that share and agree on, and fix the roles (protagonist and antagonist). In the argumentation stage, the protagonists support their standpoints by means of arguments and at least in the concluding stage the difference of opinion is resolved in the common agreement on the protagonist's or the antagonist's position. Speech acts play, in this perspective, specific roles according to the stage they are performed in: for instance, assertive acts have the function of expressing a standpoint in the confrontation stage, of advancing argumentation in the ar-

gumentation stage and of upholding or retracting a standpoint in the concluding stage. The ideal model can be considered the general scheme for the analytical reconstruction and the evaluation of the discussion, providing the main patterns to interpret the verbal moves and relate them to their role in the resolution procedure.

Since it is the function, the purpose of the verbal activity that constitutes the basilar analytical principle, a fundamental notion to take into consideration is relevance. Pragma-Dialectical approach to relevance is defined in an analytical perspective encompassing interpretation and evaluation. Speech acts are not interpreted as isolated, but in relation to the cotext and context and, ultimately, to the ultimate purpose of the critical discussion, the resolution of a difference of opinion. The perspective adopted is systematically external to the text and is based on a normative study of speech acts drawn from the integration of the Searlian and the Gricean insights. Relevance in Pragma-Dialectics can be therefore explained in relation to speech-acts essential conditions, that is, the interactional effects they are aimed at achieving. Relevance of speech acts is analyzed in three dimensions: the stage of the discussion they are performed in, their components (the propositional content, the illocutive force) and their relational respect, that is, the specific function they play in the context of the other speech acts, relatively to the other verbal moves.

Relevance is the criterion underlying the analytical reconstruction of a text or discourse. The analytical perspective is determined by the pragma-

dialectical model of a critical discussion: only the speech acts that are relevant for the resolution of a difference of opinion are taken into account. It is the dialectical point of view to orientate the pragmatic interpretation: in fact, it constitutes the dialectical pattern that determines the transformations the text has to be subjected to, in order its argumentative structure to be highlighted. In the process of reconstruction, all the parts irrelevant to the resolution of the difference of opinions are deleted, while the implicit relevant ones added. Successively, unclear or ambiguous formulations are substituted with clear ones and eventually, in order to better point out their relevance to the process of resolution, the order in which the parts of the text occur is rearranged following the steps of the ideal model. Reconstruction is therefore based on a theoretical model establishing the relevance criteria, but the model is confronted in the transformations with the empirical evidence, since it is the argumentative reality that justifies the choices in reconstructing the dialogue.

Discourse reconstruction is preliminary to the analytical overview, in which the process of resolution is analyzed through examining the standpoints, the discussion roles, the common ground, the arguments, the structure of argumentation and the argument schemes of the text. The identification of the standpoints leads to the determination of the points at issue and the type of dispute. The dispute may be, in fact, single, in case the parties disagree only about a single proposition, multiple, when more than one proposition is questioned, or mixed if the participants adopt differ-

ent standpoints with regard to the same proposition. Successively the dialectical roles are established and, as a consequence, the burden of defending the standpoint is placed on the protagonist. The structure of argumentation has to be afterwards identified as single, when to support the standpoint only one argumentation is advanced, multiple, when independent argumentations lead to the same conclusion, coordinate, in case more arguments defend the position only in combination with one other, or subordinate, when one argument supports the other argument. Eventually, the argument schemes used in supporting the conclusion have to be identified: the implicit premises help recognize which one of the symptomatic, causal or analogical schemes applies in each argument.

The last three sections of the book are focused respectively on the rules of critical discussion, their normative role in the argument evaluation and their practical application in a code of conduct that establishes a set of dialectical prohibitions.

The rules for a critical discussion are the fundamentals of the critical-rationalistic conception of reasonableness, opposed to the justificationalist claims advanced in the anthropological and the geometrical positions. In both the approaches, the first dependant on the evaluation criteria of the audience and the second based on formal criteria of validity, reasonableness is described as concerned with a definitive justification of the standpoints, ignoring the actual fallibility of human thought. In the critical-rationalistic approach, on the other hand, reasonableness is founded on dialectical basis: the possi-

bility of resolving a conflict of opinions derives from the logical principle of non-contradiction together with the criteria of intersubjective acceptability. The system of logical rules presented in formal dialectics is therefore extended to cover all the speech acts and the steps involved in assessing the acceptability of a standpoint. The procedure is regulated by fifteen necessary rules, defining the right to challenge and defend, the allocation of the burden of proof and the distribution of roles, the conditions that must be respected in attack and defence and that establish the success in refutation and justification, the principles regulating the retraction of commitments and the withdrawal of standpoints. Rules regulate and fix the stages of the discussion by imposing specific criteria to evaluate the correctness of the dialectical moves in relation to their ideal role.

Related to the rules for a critical discussion is the analysis of the fallacies. Sophisms, described by the traditional accounts as invalid arguments, are considered by the Pragma-Dialectics violations to the norms of dialogue. The infringements may occur in several ways. It might be performed, in fact, an act that is not a speech act or a speech act not belonging to the right category; the verbal move might be not belonging to the right group of the category of admissible speech acts, or it might be performed by the wrong party, or at the wrong stage, or by the right party but performing the wrong role. The taxonomy of fallacies is based on the four stages of the dialectical model: for each stage the relative associated fallacies are presented and explained in relation to the respective violated rules.

In the last chapter of the book, to conclude, a simplified code of conduct constituted by a set of ten commandments, or prohibitions, is proposed. These rules provide a more accessible system of requirements drawn from the fifteen criteria of reasonableness.

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