The Context of Censorship: A Look at Swearing, the Self, and the State

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1. Introduction

The *f-word*, the *n-word*, the *c-word*, the *b-word*: to a non-native speaker of English, it may initially seem odd that certain English words are often referred to in this manner, but chances are the majority of native speakers know exactly which words these titles represent. We manipulate, conceal and avoid *dirty* or *bad* words in polite company, and are generally taught not to use *foul language* (that language which is often labeled in general speech as *swearing* or *cursing*). Although the saying goes that *sticks and stones may break my bones but words will never hurt me*, linguists have suggested that words do indeed have the power to hurt, as one of the powers included in a greater spectrum of linguistic agency. That is to say that particular language use allows a speaker to achieve a wide range of tangible effects on their interlocutors and the world around them through communication. The effects of *bad language* are of particular interest due to the range of reactions that such language elicits when it is used both in and outside of a prototypical discursive context. In private discourse, speech occurs on a person-to-person basis (it is experienced by interlocutors and observers that are within earshot of conversation). This is the prototypical context of discourse as it is generally observed in linguistics. The language of the state, the law, and the arts are all theoretically accessible to the people, and so established organizations are interlocutors in their own right. Therefore, speech as it appears in the media and government institutions can be classified as public discourse.

In public, *bad language* is subject to disapproval at the lowest degree of scrutiny and to censorship at the highest. We see this in challenges to such language as it appears in television and radio broadcasts, as well as in literature. This work will examine the context of censorship with a specific focus on the treatment of swearing and other forms of taboo speech in the United

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1 This idea was first introduced by J.L. Austin (1962) in *How to do Things with Words*, a work that defined utterances along the lines of performativity as part of a broader speech act theory.
States. Attention will be paid to instances of censoring in order to establish the conventions that define the boundaries of bad language as it occurs in private versus public discourse. A specific focus will be placed on the distinction between government censored speech and speech that is censored by individuals, as well as the various motivations behind both practices. Within the discussion of public discourse will be a review of speech that is unprotected or protected under the First Amendment. Several cases centered on taboo speech and swearing in the public domain that had a significant impact on modern First Amendment Jurisprudence will be provided as representations of state backed censorship.

The various nuances of swear speech will be observed, specifically as it relates to the community. We seek to explain how bad language is perceived, as well as why and how it is incorporated or avoided in discourse. Further analysis of bad language as it occurs in private discourse will be provided through the synthesis of Politeness Theory. This work attempts to ultimately outline the treatment of bad language as it occurs within private and public discourse.

2. What is bad language?

In order to assess bad language, we must first note that “language that is often thought of as being bad in some way may not necessarily be bad, or is bad only in certain contexts or in certain respects” (Andersson and Trudgill 1990: 29). In this work, there is no qualitative judgment meant by the term bad language, rather it is used here because it is a label that is commonly applied to the language at hand. We define language as bad in a manner of ways. Bad language is generally deemed undesirable on two accounts, according to its:

1. Word form (swearing) and/or its
2. Referential content (taboo)
Let us first examine *bad language* as it is manifested through swearing. In discourse, swearing supports a wide range of action and to a degree, swear words retain this force out of their usual contexts. As a highly variable domain of speech, swearing presents a wealth of information that is worthy of discussion.

2.1 Types of swearing

Swearing is not limited to random insertions of vulgar terms into speech, rather, speakers employ particular *bad* words and phrases tactically to achieve some desired effect. We may generally define swearing across these lines, in which the language:

(a) Refers to something that is taboo and/or stigmatized in the culture;
(b) Should not be interpreted literally, and
(c) Can be used to express strong emotions and attitudes.

(Andersson and Trudgill 1990: 53)

One form of swearing, *foul language*, is distinct in that “[it] trespasses on topics and domains generally deemed appropriate in personal but not social language-- that is, bodily functions and body products (or effluvia)” (Wajnryb 2005: 19). Examples of foul language include the terms *shit, fuck, jizz*, and *bloody*, which in turn refer to excrement, intercourse, semen, and of course, blood.

Two closely related terms that describe different methods of swearing are blasphemy and profanity. *Blasphemy* is “a form of swearing that deliberately vilifies religion or anything associated with religious meaning” whereas *profanity* is “swearing through the use of words that abuse anything sacred” (Wajnryb 2005: 17-21). The difference lies in the intention of the speaker, as one who blasphemes is openly insulting the religious, while a speaker who profanes is more
passively mentioning the divine in an inappropriate and often irrelevant context. Furthermore, the adjectival use of *profane* refers to that which is secular, as “to be profane means to be ignorant or intolerant of the guidelines of a particular religious order” (Jay 1992: 3). An instance of profane speech would be a phrase such as *For the love of God, get on with it!*, which refers to a deity, while a phrase such as *Screw the Pope!* would fall under the umbrella of blasphemy, being a direct attack on a religious figure (Jay 1992:4).

A *curse* is similar to *blasphemy* in its directness, but while *blasphemy* is an open assault on the religious (or the church), a *curse* is an open attack on the addressee or intended recipient of the curse. Swearing must meet a number of conditions to be considered an instance of true cursing:

Cursing invokes the aid of a higher being; it is more ritualistic and deliberately articulated; it is future-oriented, built on an understanding that the effect may be delayed; and it may not involve the use of foul language.

(Wajnryb 2005: 17)

It may be difficult to imagine a subset of swearing that does not necessarily feature foul language, and yet it is very clear that a curse such as *Go to Hell!* carries a certain pragmatic weight unlike the common command. The curser requires a target (the cursed), and it is this element of threat that lends a curse its power.

Socially driven censoring gives rise to *euphemistic swearing*, which “involves the substitution of an inoffensive term, or one that is seen as acceptable...for one that is considered indelicate or taboo-breaking” (Wajnryb 2005:18). Although they are commonplace, euphemistic swear words are marked counterparts to the words they replace and as such they are not as versatile as the swear words from which they gain their inspiration: a swear word may not be
substituted in all environments with its euphemistic partner. Examples of euphemistic swearing can be seen in the following pairs:

- English *Shoot!* [is substituted] for *Shit!*, Spanish *Caramba!* for *Carajo! ‘Prick!’*, German *Scheibenkleister!* (‘window glue’) for *Scheisse! ‘Shit!’*, and Russian *Yaponski bog!* (‘Japanese god’) for *Yob tvojú mat’!* (‘Somebody fucked your mother!’ often inadequately rendered into English as ‘Fuck your mother!’).

  (Ljung 2010: 11)

It is evident by these examples that euphemistic swear words seek to imitate the ‘bad’ words they replace, either in terms of the initial phonemes of each word (as in the /ʃ/ of *shoot* and *shit*) and/or in the number of syllables of each phrase (*Yob tvojú mat’!* and the euphemistic *Yaponski bog!* both contain four syllables). Additionally, euphemistic swear words may copy the nucleus of the ‘bad’ word they replace, as in the French phrase *sacre bleu* ‘sacred blue’, in which the word *bleu* [blø] is substituted for phonetically similar *Dieu* [djø] ‘God’ (Hughes 1991: 12).

Each of these cases of swearing would constitute *bad language*, mainly due to the form of the words used but also due to the fact that these expressions (*shit, fuck you!, etc.*) depict particularly delicate subjects: their referential content is also ‘undesirable’, as it is *taboo*.

2.2 Taboo

We come now to an examination of bad language as it characterized by its taboo referential content. The term *taboo* refers to that which is:

- set apart for or consecrated to a special use or purpose; restricted to the use of a god, a king, priests, or chiefs, while forbidden to general use; prohibited to a particular class (esp. to women), or to a particular person or persons; inviolable, sacred; forbidden, unlawful; also said of persons under a perpetual or temporary prohibition from certain
actions, from food, or from contact with others.

(“taboo | tabu, adj. and n.”)

In other words, “a taboo is a proscription of behavior for a specifiable community of people, for a specified context, at a given place and time”, and as such does not “[hold] for all worlds, times and contexts” (Allan and Burridge 2006: 27). Taboos may vary across cultures as they reflect the differing values and beliefs of different communities, but they often concern reference to the following:

- bodies and their effluvia\(^2\) (sweat, not faeces, menstrual fluid, etc.);
- the organs and acts of sex, micturition\(^3\) and defecation;
- diseases, death and killing (including hunting and fishing);
- naming, addressing, touching and viewing persons and sacred beings, objects and places; [and]
- food gathering, preparation and consumption.

(Allan and Burridge 2006: 1)

The taboo on bodily effluvia is evident in common expressions that we use to describe *bad language*, as we can use *gutter-talk* and *filthy language* and be *foul-mouthed*, each of which evoke imagery of the soiled and dirty. Indeed, according to linguists Lars Andersson and Peter Trudgill,

> Everything that leaves the body at different places and in different ways (feces, urine, mucus, sweat, menstrual blood, spittle, semen, ear wax and all the smells of the body) are things which we are supposed to be afraid and ashamed of… [and] there is a desire, even an obsession, in our society to keep our bodies clean.

(Andersson and Trudgill 1990: 36)

\(^2\) One exception to this taboo are tears, which do not seem to carry the same negative connotations as other bodily products.

\(^3\) *urination*
Andersson and Trudgill argue that the human preoccupation with cleanliness extends to the language we use itself, in that we aspire to use “clean” language and to avoid “dirty words”.

A taboo that is common cross-linguistically is the name taboo. In his article “Name Taboos and Rigid Performativity”, Luke Fleming states that names elicit linguistic politeness from speakers because of their referential nature:

Inherently referential noun-phrase [NP] types\(^4\) … are the ones which most often develop ‘polite’ pragmatic alternants…[as] reference to addressee is the most elaborated site of pragmatic distinctions cross-linguistically.

(Fleming 2011: 145)

It is this direct reference to another person that is avoided, and often predicated on the relationship between the speaker and the addressee; for example in Bengali, name taboos are based on relation by marriage as “the taboo on a wife uttering the name of her husband, or of an male inlaw of same or ascending generation, developed from pragmatic restrictions on her use of these names in direct address” (Fleming 2011: 147). Name avoidance does not follow the same rules in all languages that share this taboo however, as in “Oromo (Ethiopia), the names of a man’s mother- and father-in-law are wholly taboo to him while he merely avoids the names of his other affinal relations in direct address” (Fleming 2011: 147). Not only do name taboos apply specifically to names, in an interesting twist they may apply to name homophones as well. Take for example, the polite speech of male Zulu speakers:

men’s respectful speech with regard to the King or Chief…consists in an avoidance of his name and words similar to it. For instance, taboos on the personal names \textit{uMpande},

\(^4\) Fleming claims that names are inherently referential NPs on the following logic: “personal names are social indexicals…[and] the successful use of a personal name presupposes that both the speaker and the addressee have been socialized to this name-referent connection” (Fleming 2011: 145).
undlela, and sandla meant that the words impande ‘root’, indlela ‘path’, and isAndla ‘hand’ were also avoided.

(Fleming 2011: 154)

This taboo on personal names and name homophones is present among the Tiwi people of northern Australia as well, however in this case “the proper name of a dead person is taboo…[and] words that sound like these proper names also become taboo” (Andersson and Trudgill 1990: 57). The variable treatment of name taboos reflects that even when different communities share basic values of linguistic restriction, this language censoring may manifest differently.

The taboo on the divine is apparent in phrases such as do not take the Lord’s name in vain. The logic behind the condemnation of profanity is expressed by English clergyman Josiah Woodward in his work A kind caution to profane swearers, where he states “it is…to be considered That the Tongue of Man is his Glory and human Speech a Sort of Miracle in Nature: And it is given to Man, that he might glorify God who gave it to him” (Woodward 1790: 6). It seems clear that the English taboo on uttering God out of context is a name taboo motivated by some respect for the divine. However, religious name taboos are not restricted to the ‘higher’ powers, as in addition to the taboo on direct reference to God, certain languages express a taboo on the “infernal”, that is, mention of the Devil and Hell. The taboored reference to these ‘lower’ powers is not motivated by respect for the subject, rather it is based on the assumption that reference to these entities would invoke their wrath. For example, French features the phrase Quand on parle du loup on en voit la queue ‘When you speak of the wolf, you can see its tail,’

5 Young Anglophone girls often participate in the ritualistic flouting of name taboos in the “Bloody Mary” tradition. Variations on this folklore exist (see Dundes 1998) but generally it consists of girls uttering Bloody Mary several times in front of a mirror in an unlit bathroom. It is said that Mary (a ghost or demonic specter) will appear as a result of being “called”.
and Swedish has the similar *När man talar om trollen står de i farstun* ‘When you speak of the trolls they are on your doorstep’ (Ljung 2010: 6). As these superstitions concern the potentially ruinous power of spoken language, we may extend the taboo on the divine to be a general taboo on the supernatural.

Linguistic taboos may also arise in one language within a bilingual community due to speakers’ knowledge of another language. For example, work by Mary Haas showed that Thai-English bilinguals (L1= Thai, L2= English) in an English setting “didn’t use certain Thai words, because they sounded like obscene words in English…[including] �āg ‘sheath’; �āg ‘to hatch’; [and] ผิง, ‘(chili) pepper,’” these words being phonetically similar to *fuck* and *frig* (Andersson and Trudgill 1990: 57). Interestingly enough, this cross-linguistic taboo did not only apply one-way, as the Thai-English bilinguals would not use the English word *yet*, “because it sounded too close to Thai จีด, ‘to have sexual intercourse’” (Andersson and Trudgill 1990: 58). The taboos on the Thai words (‘sheath,’ ‘pepper’ and ‘to hatch’) and the English *yet* would be considered “purely linguistic” as the words were only taboo in their phonetic similarity with truly taboo words in the opposite language, and only in the context of an English immersion environment.

In theory taboos are not arbitrarily imposed, as they “normally arise out of social constraints on the individual’s behavior…in cases where the individual’s acts can cause discomfort, harm or injury” to themselves or to others (Allan and Burridge 2006: 9). However, it is possible to create a taboo within a speech community. Consider the following example, from my own experience. A third grade teacher, in an attempt to bolster her students’ self-esteem, forbade students from uttering the words *can’t* and *cannot*. This restriction was not just imposed on students’ spontaneous speech, but also extended to literacy activities as well: if students came across the words *can’t or cannot* in a text when reading out loud, they were required to
emphatically say *can* (effectively reversing the meaning of the phrase) or to replace the taboo *can’t* with a pointedly muffled *mmph*. According to the teacher, ‘negative’ words such as *can’t* and *cannot* were harmful to the students, as they would unconsciously encourage self-doubt in the students who used such negations in their speech. In the dialect of the class, *can’t* and *cannot* became tabooed at the insistence of the teacher, who saw this proscription on *can’t* as a means of inspiring her students to fulfill their potential. However, this taboo does not apply to the larger Anglophone community, and so it seems that it is possible to create taboos under the right environmental circumstances (I would hazard a guess that the majority of students from the *can’t*-taboo class have since reinstated the negation in their personal speech).

Although the subject of taboos fluctuates cross-culturally, taboos seem to belong to some intrinsic natural class. Taboos concern the human experience, as defined through our bodies (food and waste, reproduction, health and disease), our social needs (personal address and interactions), and our belief in the supernatural (superstition and religion). It is not surprising that we avoid direct discussion of such weighty subjects, as they are reminders of our finite existence. Like other incarnations of *bad language*, we treat taboo subjects in very particular ways in private discourse.

3. Coping with *bad language* in private discourse

As we have seen, speakers sometimes manage taboo language by avoiding its utterance altogether. However, speakers may adopt other “avoidance strategies” to deal with taboo language: whispering the taboo word, using conversational hedges (such as *not to be vulgar*, *but...* or the conventional *pardon my French*), and/or by changing an utterance as it is spoken.

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6 The expression *excuse my French* has been recorded in English from 1895. It seems this association of the French with taboo ideas is a remnant of cultural tension between the British and the French, which has carried over into the English language. Other instances of so-called “French insult” include *french prints* (recorded c. 1850, meaning *pornographic images*) and *French pox* (recorded 1598, meaning *syphilis*) (Hughes 1991:131-2).
(as previously mentioned in section 2.1, substituting *shoot* for *shit*) (Wajnryb 2005: 179).

 Speakers’ avoidance of *bad language* in private discourse is further manifested in their use of different registers. Different registers favor the use of the pragmatically distinct dysphemism, orthophemism, and euphemism.

3.1 Dysphemism, orthophemism and euphemism

The differences between dysphemism, orthophemism and euphemism are the differences between *fat*, *overweight*, and *big-boned*: each term indicates the same *denotatum*, but varies considerably in its *connotations*. According to Allan and Burridge, “denotation is the relation between language expressions and things or events in worlds – not just the world we live in, but any world and time (historical, fictional, imagined) that may be spoken of,” whereas a word’s connotations “are semantic effects (nuances of meaning) that arise from encyclopedic knowledge about a word’s denotation and also from experience, beliefs and prejudices about the contexts in which the word is typically used” (31). So, while denotatum encompasses the relationship between words and reality, connotation refers to the variable metaphoric or “extra” meanings of words. Triads of dysphemisms, orthophemisms, and euphemisms share denotive meaning but are distinct in their connotative meanings, and often they represent different linguistic treatment of taboo subjects.

A dysphemism is defined as “a word or phrase with connotations that are offensive either about the denotatum and/or to people addressed or overhearing the utterance” (Allan and Burridge 2006: 31). Taboo language in the form of swearing is generally considered to be dysphemistic. Whereas dysphemisms are “dispreferred (tabooed) expressions”, orthophemisms
and euphemisms are “alternative[s] to a dispreferred expression” (32). More specifically, an orthophemism is used in a formal, clinical or scientific register, whereas euphemisms belong to informal, colloquial registers (orthophemisms are more direct/literal than euphemisms). The relationship between dysphemism, orthophemism and euphemism is best seen through example, as in Figure 1, which depicts X-phemism triads:

<table>
<thead>
<tr>
<th>Orthophemism</th>
<th>Euphemism</th>
<th>Dysphemism</th>
</tr>
</thead>
<tbody>
<tr>
<td>faeces</td>
<td>poo</td>
<td>shit</td>
</tr>
<tr>
<td>toilet</td>
<td>loo</td>
<td>shthouse</td>
</tr>
<tr>
<td>menstruate</td>
<td>have a period</td>
<td>bleed</td>
</tr>
<tr>
<td>my vagina</td>
<td>my bits</td>
<td>my cunt</td>
</tr>
<tr>
<td>Jesus</td>
<td>Lord</td>
<td>Christ! [blasphemy]</td>
</tr>
</tbody>
</table>

**Figure 1:** Contrasting X-phemisms (as taken from Allan and Burridge 2006: 32)

Oftentimes we find several euphemisms for a tabooed subject. For example, Figure 1 notes loo as a euphemism for toilet, and yet we also have the euphemistic bathroom, powder room, water closet, washroom, commode, potty, lavatory, john and restroom. While we may feel more rested after using the restroom the main purpose of a restroom is not to rest, and similarly a bathroom is not required to contain a bath; as speakers of English, we know this, and we know that these expressions are polite, as opposed to literal, terms. Although we also have the formal orthophemism latrine, and the rather abrupt dysphemism crapper, the number of euphemisms for the ‘room in which one relieves themselves’ seem to outweigh the formal and dispreferred (or impolite) expressions for such a place. In ordinary parlance, euphemisms are assumed to be polite alternatives to impolite expressions. However euphemisms are not necessarily polite, as we can

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7 Dispreferred expressions are not exclusively defined by word form, as Allan and Burridge note that “under most circumstances the dispreferred response to an invitation is refusal” and “dispreferred responses to a greeting are a dismissal or a cold stare” (32).
8 Dysphemisms, orthophemisms, and euphemisms are said to belong to a class of X-phemisms which share “cross-varietal synonymy, i.e. words that have the same meaning as other words used in different contexts” (Allan and Burridge 2006: 29)
see by terms that describe oral sex. The euphemisms give head/a blow job are not as direct as their corresponding orthophemisms (cunnilingus/fellatio) and dysphemisms (eat pussy/suck cock), and yet they certainly are not polite; in this case, the euphemisms are purely colloquial.

In the discussion of the taboo, dysphemisms are not confined to swear words. The mention or direct address of a taboo subject, such as God, would be “offensive…to people addressed or overhearing the utterance,” and would therefore constitute a dysphemism (Allan and Burridge 2006: 31). Indeed, in English there have appeared at least thirty-five euphemisms for the word God which are provided in Figure 2. It is also considered taboo to utter Jesus Christ, and so we find many euphemisms for this name as well: jis, jeeze, jove, gee, gee whiz, jeepers creepers, by jingo, jiminy cricket, cripes, crust, crumbs, crikey (Wajnryb 2005: 115), jiminy Christmas, Jesus H. Christ, Cheese and rice, and even Jeebus9.

<table>
<thead>
<tr>
<th>Date</th>
<th>Euphemism</th>
<th>Date</th>
<th>Euphemism</th>
</tr>
</thead>
<tbody>
<tr>
<td>1350s</td>
<td>gog</td>
<td>1695</td>
<td>odso</td>
</tr>
<tr>
<td>1386</td>
<td>cokk</td>
<td>1706</td>
<td>ounds</td>
</tr>
<tr>
<td>1569</td>
<td>cod</td>
<td>1709</td>
<td>odsbodikins (God's little body)</td>
</tr>
<tr>
<td>1570</td>
<td>Jove</td>
<td>1728</td>
<td>agad</td>
</tr>
<tr>
<td>1598</td>
<td>sblood</td>
<td>1733</td>
<td>ecod</td>
</tr>
<tr>
<td>1598</td>
<td>'slid (God's eyelid)</td>
<td>1734</td>
<td>goles</td>
</tr>
<tr>
<td>1598</td>
<td>slight</td>
<td>1743</td>
<td>gosh</td>
</tr>
<tr>
<td>1599</td>
<td>'snails (God's nails)</td>
<td>1743</td>
<td>golly</td>
</tr>
<tr>
<td>1600</td>
<td>zounds (God's wounds)</td>
<td>1749</td>
<td>odrabbit it</td>
</tr>
<tr>
<td>1601</td>
<td>sbody</td>
<td>1760s</td>
<td>gracious</td>
</tr>
<tr>
<td>1602</td>
<td>sfoot (God's foot)</td>
<td>1820s</td>
<td>ye gods!</td>
</tr>
<tr>
<td>1602</td>
<td>gods bodykins</td>
<td>1842</td>
<td>by George</td>
</tr>
<tr>
<td>1611</td>
<td>gad</td>
<td>1842</td>
<td>s'elpe me Bob</td>
</tr>
<tr>
<td>1621</td>
<td>odsbobs</td>
<td>1844</td>
<td>Drat! (God rot!)</td>
</tr>
<tr>
<td>1650s</td>
<td>gadzooks (God's hooks)</td>
<td>1851</td>
<td>Doggone (God-darn)</td>
</tr>
<tr>
<td>1672</td>
<td>godseekers</td>
<td>1884</td>
<td>Great Scott</td>
</tr>
<tr>
<td>1673</td>
<td>egad</td>
<td>1900</td>
<td>Good grief</td>
</tr>
</tbody>
</table>

Figure 2: English euphemisms for God, and their dates of recording (Hughes 1991: 13)

9 Jeebus originated on The Simpsons, and although its use is undocumented, its reference is not unheard of.
It seems that not all dysphemisms come equipped with corresponding euphemisms, however. For example, the dysphemism *motherfucker* may be referred to in orthophemistic terms as depicting *incest* or an *Oedipal* relationship, but one would be hard-pressed to find a conventional euphemism to describe such a situation (with cultural knowledge of the film *Psycho* (1960), it would be possible to call someone a *Norman Bates*, but this is certainly not as ubiquitous an expression as *motherfucker*). This lack of a conventional euphemism for *motherfucker* is evident in the censored (televised) versions of the films *Snakes on a Plane* (2006) and *Die Hard 2* (1990), in which characters’ utterances of *motherfucking* and *motherfucker* are dubbed over with the somewhat absurd terms *monkey-fightin’, Monday-to-Friday*, and *mister falcon*. Perhaps words like *motherfucker* do not have lexicalized euphemisms as they are so taboo that their mention, even in other terms, is unwelcome in discourse. It would seem that swear words that denote strongly abhorred concepts, such as incest, are intrinsically taboo. This leads us to question whether all dysphemisms are inherently bad.

3.2 Are *bad words* inherently taboo?

In the discussion of *bad language*, a question that often arises is whether swear words (a subclass of dysphemism) are inherently taboo, or whether they have gained tabooness over time. A number of former English street names seem to suggest that the latter is true, that words’ tabooness is acquired and not intrinsic. London’s present-day *Sherborne Lane* was alternately known by *Shitteborwelane* (recorded 1272), *Shiteburgh Lane* (1321), *Schittebourne Lane* (1349), *motherfucking* is an intensifier which may indicate a strong negative or positive connotation (“motherfucking, adj. and adv.”)

10 On urbandictionary.com, a website that allows any user to define English slang terms, there are 50+ entries declaring *mofo* as an abbreviation for *motherfucker*, with 16,000+ “approval” ratings for these entries. While it seems *mofo* is a lexicalized equivalent of *motherfucker* in at least in some speech communities, it is unclear as to whether this constitutes a euphemism (whether polite or impolite) or a dysphemism.
and several other shit variants. The street first acquired a non shit-based name in 1467, when it became Shirbouruelane ('Shelley House - Ship Alley'). Apparently Sherborne Lane was originally associated with excrement as it was once home to a number of public lavatories; therefore, the use of shit was relevant and referential (Partridge, 2004). The forthright use of shit in the street’s older name suggests that the word was not taboo at the time if it was appropriate enough for such public display. Another curious example is the former Pissing Alley. Pissing Alley acquired the non-dysphemistic name Passing Alley sometime between 1746, when its original form was noted on John Rocque's map of London, and the 1790s, when it appeared under the new moniker on Horwood’s map ('St John’s Gate and St John’s Lane'). The motivation behind the name change is not entirely clear, although it seems to indicate that in this time period piss acquired a degree of ‘badness’ that warranted a name change.

Perhaps the most shocking street name by today’s standards is London’s former Gropecuntlane (1230), which was a purported center of prostitution, and thereby rather aptly named (Hughes 1991:20). The name Gropecuntlane was not unique to London, as there were reportedly various Grope lanes across England, and in fact one Grope Lane remains to this day in Shrewsbury’s town center. According to urban archeologist Dr. Nigel Baker, as quoted in an article from The Telegraph, “the Victorians got rid of a lot of the Grope Lanes around the country, it has only remained in Shrewsbury…the name is often explained away today because it is a dark street that people have to grope their way along” (“Street names,” 2009). However, London’s Gropecuntlane became Magpie Lane in the seventeenth century (“Magpie Lane,” 2012), indicating perhaps that the term cunt began to become undesirable some two centuries prior to the Victorian era.
Cunt was formerly used as a scientific term for vulva, as noted by the Oxford English Dictionary’s first definition of the word. The orthophemistic definition cites this quote from Lanfrank's "Science of Cirurgie" (a1400) as supporting evidence: *In wymmen pe necke of pe bladdre is schort, & is maad fast to the cunt* (‘In women the neck of the bladder is short and is made fast to the cunt’). In the Middle Ages it seems that it was appropriate to use cunt as an anatomical term in a medical text, whereas in modern times it would be highly unlikely for a gynecologist to refer to one’s vulva as a cunt due to the word’s acquired tabooness. The formerly orthophemistic word even featured in family names, as in the case of the English men Robert Clevecunt (1302), John Fillecunt (1216), and the women Gunoka Cuntles (1219) and Bele Wydecunthe (1328) (Hughes 2006: 110). The OED’s second definition for cunt (n.) is dysphemistic: “A woman as a source of sexual gratification; a promiscuous woman; a slut. Also as a general term of abuse for a woman.” The earliest citations for this more familiar, dysphemistic, use of cunt come from 1663, 1674, and c1675, supporting the idea that cunt was gaining tabooness in the 1600s, and was appropriate prior to this time.

From the examples above, it seems that words’ connotative meanings change over time. This occurs even in words that do not necessarily acquire tabooness, but rather become more positive as in the adjectival use of pretty. The Oxford English Dictionary gives one definition of pretty (adj.) as “Originally: cunning, crafty. [and] Subsequently: clever, skillful, able.” The original, rather negative connotation of pretty is evident in a citation from c. 1475: *Titivillus kan lerne yow many praty thynys* (‘Titivillus [a demon] can teach you many cunning things’). In its modern form the adjectival pretty, when used in reference to skill as in the phrase you’re pretty good at that, does not carry strongly negative connotations; its connotative meaning has shifted. Such connotative changes indicate that words are not inherently bad, and as Andersson and
Trudgill (1990) note, “No word or phrase is in itself bad. It is bad only in the eyes of those who evaluate and look at the language” (35). Indeed, the *Telegraph* article on former London street names attributes the changes to a burgeoning “puritanical” Protestantism that gained traction in sixteenth century England. Our perceptions regarding *bad language* are subjective in relation to our time period, and even in relation to our personal speaking style. It is difficult to pinpoint exactly when and how words become *bad*, but like most instances of language change the shift seems to be gradual, so much so that individuals may not be aware of the connotative changes within their lifetime.

3.3 Reactions to *bad language*: censoring and censorship

Regardless of how words become *bad*, once they are seen in such a negative light they elicit some rather extreme reactions in the forms of censoring and censorship. The terms *censorship* and *censoring* are often used interchangeably to refer to the restriction of certain behaviors. The difference between the terms lies in the authority of the agent: while the censorship of language denotes “institutional suppressions of language by powerful governing classes, supposedly acting for the common good”, language censoring “encompasses both the institutionalized acts of the powerful and those of ordinary individuals...[as] everyone censors his/her own or another’s behaviour from time to time” (Allan and Burridge 2006: 24). It would seem then that censoring and censorship are motivated by a set of shared social ideals that lay the

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12 For example, many English speakers object to the word *moist*, apparently due to its sensory connotations; however, one could hardly claim that *moist* is conventionally ‘bad’ or taboo in the Anglophone world.
framework of acceptability within a community, but that censorship is enacted only in extreme cases where mere social disapproval does not sufficiently rectify the ill behavior\textsuperscript{13}.

The use of taboo language, in particular swearing, in spoken discourse is generally frowned upon. Children are often punished for swearing with verbal reprimands and groundings. Punishments are also physical in nature, as children are spanked and/or have their mouths washed out with soap as a result of swearing. In the study “Memories of Punishment for Cursing” by Jay, King, and Duncan (2006) it was found that parents most often punished children for swearing by verbal reprimand (41%), followed by soaping of the mouth (20%), and other physical punishments (14%)\textsuperscript{14}. Perhaps because we are taught not to swear as children, we develop other means of discussing taboo. As previously mentioned, speakers elect to use euphemisms or orthophemisms as opposed to offensive dysphemisms when broaching taboo subjects (for example, choosing to say that he passed away or he died as opposed to he snuffed it). As bad words evoke a range of reactions, we learn to modify our discourse style to fit interactions; this constitutes self-censoring.

*Bad language* is censored in print as well, whether as part of literary texts or dictionaries. To censor literature based on the bad language it contains is to *bowdlerize*, “to expurgate (a book or writing), by omitting or modifying words or passages considered indelicate or offensive; to castrate” (“bowdlerize, v.”). This term is derived from the name of Dr. Thomas Bowdler (1754-1825), self-declared censor. Bowdler sought to clean up the works of Shakespeare to make them

\textsuperscript{13} Indeed, according to Allan and Burridge, “all kinds of tabooed behaviour are subject to *censoring*, but only certain kinds are subject to *censorship* – for instance, child pornography is subject to both *censorship* and *censoring*, but picking your nose in public is subject only to *censoring*”(24).

\textsuperscript{14} Although individuals endured the unpleasantness of soap punishment as children, Jay, King and Duncan note that “this does not prevent them from cursing” as adults. Their work compares childhood punishments for swearing to individuals’ swearing habits in adulthood, suggesting that “punitive responses by and large have little effect on later cursing.”
appropriate for family reading by eliminating all profane and obscene content, but he lacked consistency in censoring, generally cutting sexual speech while preserving the violent (Hughes 1991: 243-244). Although Bowdler censored in nineteenth century England, the spirit of challenging books based on ‘objectionable’ content is alive and well in modern America. According to the American Library Association (ALA), 5,099 challenges were reported to the ALA’s Office for Intellectual Freedom between the years 2000 and 2009. The ALA defines a challenge as a “formal, written complaint, filed with a library or school requesting that materials be removed because of content or appropriateness”, and notes that their figures are not wholly representative of the number of national challenges as their data is dependent on challenges being reported\(^\text{15}\) (“Frequently challenged books,” 2014). Materials such as books and other media are challenged most often in classrooms and libraries, with objections to content involving taboo subjects (grounds for challenges are noted in Figure 3, below).

\[
\begin{array}{|c|c|c|c|c|c|c|}
\hline
\text{Grounds for Challenge} & \text{Sexually Explicit Material} & \text{Offensive Language} & \text{Materials unsuited to age group} & \text{Violence} & \text{Homosexuality} & \text{Satanic, occult themes} & \text{Religious Viewpoint} & \text{Anti-Family} \\
\hline
\text{Number of Materials Challenged} & 1,577 & 1,291 & 989 & 619 & 361 & 274 & 291 & 119 \\
\hline
\end{array}
\]

\textbf{Figure 3: The basis for challenges, 2000-2009}\(^\text{16}\) (“Frequently challenged books,” 2014)

Attempts to remove ‘objectionable’ materials from public access reveal that taboo content (generally of a sexual nature) and undesirable word form (offensive language), our building blocks of bad language, have the potential to arouse the greatest disgust from individuals, even when bad language is unspoken.

\(^{15}\) The ALA estimates that there is a 1:4 (or 1:5) ratio of reported to unreported challenges, suggesting that the actual number of challenges from 2000-2009 fall in the range of 20,396 to 25,495 incidents.

\(^{16}\) Note that materials may be challenged on multiple accounts, which is why the number of materials challenged here (5,521) is greater than the total number of challenges (5,099).
Swearwords have historically received limited attention from dictionaries, with recent omissions of words such as *fuck* in Webster’s *New International Dictionary*\(^{17}\) (1962), Random House’s Dictionary of the English Language (1966), and the Oxford English Dictionary (editions prior to the 1970s) (Wajnryb 2005: 59-61). When written in newspapers, swearing is often alluded to as opposed to represented accurately as a printed swear word might offend some reader and prompt complaints. Periodicals tend to censor swear words by altering their written form, as “[one] swearing-curtailing device is to allow the taboo word, but disenvowel it, so that FUCK and CUNT become ‘f-ck’ and ‘c-nt’ [or ‘f*ck’ and ‘c*nt’]” (Wajnryb 2005: 187). In comics, such typographical censoring is taken a step further and bad words are replaced by *grawlixes*. Grawlixes, also known as *obscenicons*, are combinations of “mixed typographical symbols” or “cursing characters” that provide visual representations of *bad* words, as in @#$%&!. The use of grawlixes to represent swearing in comics is found as early as 1909 (Zimmer, 2010).

It seems that bad language is censored whether in spoken or written form due to its referential content and its composition, and this censoring ranges in severity. Bad language in written word is censored by changes to its visual form, or by total eradication of the targeted language from texts. In responses to spoken language, bad words are censored via verbal chastisements (*clean up that dirty mouth!* and physical punishments (soaping of the mouth). To gain further understanding of the censorship of bad language, it is important to consider discourse through a model of politeness.

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\(^{17}\) Interestingly, this edition includes other so-called “four-letter words”, only excluding *fuck* (Wajnryb 2005: 61).
3.4 Politeness and *bad language*

Speech in interaction is often guided by a speaker’s notion of politeness. Linguistic (im)politeness “refers to the ways in which speakers adapt (or fail to adapt) to the fact that their interlocutors, actual or imagined, have social needs like their own” (Johnstone 2008: 145). In other words, linguistic politeness determines how a speaker interacts with their interlocutor(s) as a social agent; this is especially true in regards to speakers’ use of *bad language*. Language choice is commonly regarded as a reflection of the complex social self. Indeed, according to linguist Barbara Johnstone:

We use the resources of language to perform a variety of social identities, geared to the situations we find ourselves in and the ways we are socially positioned by others. But we can also use language to construct and project a coherent, more durable personal identity. (Johnstone 2008: 155)

In different social situations, we speak differently; for example, someone may use a formal register when speaking to their boss, but drop to a casual register and “swear like a sailor” when among friends. Stylistic shifts in speech are frequent, everyday occurrences, but we may ask ourselves what exactly is the motivation for shifting registers. Simply put, specific situations demand different behaviors depending on what it is we seek to accomplish in an interaction. As speakers we modify our speech to fit our social environment, within the confines of politeness. We have previously established that *bad language*, defined by its taboo content and/or form, is generally condemned as a matter of prescriptive tradition. The following section will treat *bad language* from this traditional approach, where such language is viewed negatively, as the positive aspects of bad language will be explored further down the line.
3.4.1 The concept of *face*

A thorough framework of linguistic politeness is established by Brown and Levinson (1987) in “Politeness: Some Universals in Language Use”. Central to this work is the concept of an individual’s *face*, which consists of their social persona with respect to others. Face, though a representation that is created by an individual, is dependent on the perceptions of others. In order for an individual to effectively claim positive social value, they must rely upon the cooperation of those with whom they are interacting. There is, therefore, an inherent cooperation in face construction, and face is mutually sustained. According to Brown and Levinson:

> Face is something that is emotionally invested, and that can be lost, maintained, or enhanced, and must be constantly attended to in interaction. In general, people cooperate (and assume each other’s cooperation) in maintaining face in interaction.

(Brown and Levinson 1987: 311)

Adequate face maintenance depends on collaborative social construction, and interlocutors are mutually vulnerable because of this collaborative aspect. Mutual face maintenance is dependent on the idealized behavior of an interlocutor. Brown and Levinson refer to an idealized interlocutor, one that is cooperative as well as rational, as a “Model Person (MP).” It is necessary to utilize the notion of an MP (or any generalized representation of an interlocutor) as “no matter how much we know about the social context of discourse, we cannot predict what a particular person will say in a given instance, or how it will be interpreted by another person” (Johnstone 2008: 157). This is due to the fact that even as members of a social set, humans retain their relative linguistic spontaneity:

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18 *Face* is a social element first introduced by Irvin Goffman (1967) as “the positive social value a person effectively claims for himself by the line others assume he has taken during a particular contact” (299).
19 Face may fluctuate: when one interlocutor’s face is compromised, so is the other’s.
People’s linguistic resources and choices are limited by the ways in which their behavior forms a part of the whole ecology of human social life...participants in discourse are individual human beings mean[ing] that discourse is fundamentally creative, even if the linguistic decisions made by one individual are often the same as those made by others. (Johnstone 2008: 157)

We can assume that an MP understands the social constraints of their environment as well as the relative social distance of the relationship with their interlocutor, and that on a broad level social distance will systematically determine how a person acts with respect to linguistic politeness.

Brown and Levinson further define face by dividing it into two components, positive face and negative face. Positive face is “the want of every ‘competent adult member’ that his wants be desirable to at least some others” (Brown and Levinson, 1987: 312); in other terms, one’s positive face represents their need to be affirmed, approved of and admired by others. In contrast to positive face, negative face is “the want of every ‘competent adult member’ that his actions be unimpeded by others” (312); negative face is one’s need to be autonomous and uninhibited. Both negative face and positive face are present in humans, as they represent our inherent desires and needs. Face is relevant to discourse, as we act under the constant need to maintain face.

The security of our positive and negative face may be compromised by Face-Threatening Acts (FTAs), as caused by Speaker (S) or Hearer (H); FTAs may arise from the use of bad language. For example, a Hearer’s negative face may be threatened by a Speaker if S impedes H’s freedom of action through an order or request if “S indicates that he wants H to do, or refrain from doing, some act” (313). A swearer is vulnerable to this negative FTA if their swearing is

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20 This supports Goffman’s (1967) definition of face, as he states that “face is an image of self delineated in terms of approved social attributes” (299).
perceived to be undesirable by their interlocutor, and if the interlocutor chastises them for swearing. This is evident in the following dialogue taken from the *Kids in the Hall* sketch, “Ham of Truth”:

**Mother:** Enjoying your ham steak head, Bob?

**Bob:** Yeah I like it, it’s really *fuckin’* good…ooh oops, I mean, fine ham abounds, mom.

...  

**Father:** Okay, you listen to me, little guy - you don't curse under my roof, you don't curse on my roof, or in front of my wife! You got that?

In this dialogue, the Father (S) threatens the negative face of Bob (H) by commanding him not to swear, thereby limiting his freedom of action. This doubles as a positive FTA, as reprimands indicate that “the speaker does not care about the addressee’s feelings [or] wants…that in some important respect he doesn’t want H’s wants” (Brown and Levinson 1987: 314). By vocally disapproving of Bob’s use of *fuckin’*, the Father negatively evaluates Bob’s positive face in that he negatively evaluates his speech style.

The Speaker may threaten the Hearer’s positive face through the use of expletive swearing; an expletive is “the exclamatory swear word or phrase said in emotional circumstances…[that] betrays a letting off of pent-up steam” (Wajnryb 2005: 18-19). Positive FTAs that threaten the Hearer’s face include “expressions of violent (out-of-control) emotions…[that give] H possible reason to fear [S] or be embarrassed by him,” and so a stream of expletives from a Speaker displaying aggression may easily frighten or embarrass their interlocutor (Brown and Levinson 1987: 314). A Speaker may threaten their own face as well. For instance, an episode of charged expletive swearing constitutes “emotional leakage,” which directly damages the Speaker’s positive face as it causes others to negatively evaluate him (315).
FTAs are not restricted to the use of swearing, they also apply to discussion of the taboo. For example, the Speaker may present a negative FTA to the Hearer if S discusses taboo subjects and makes H uncomfortable (315). Take for example, the following interaction between sibling characters from the television series, *Peep Show*:

Sarah: All the shit that went on at Grange Terrace before the move, get it all out! Cause it's so hard when you're trying to work through this family stuff on your own, isn't it?

Mark: (In voiceover:) *Why do the people who want to talk about things always win? Why can't the people who don't want to talk about things win?*

In this excerpt, Sarah (S) urges her brother to discuss their family issues. This threatens Mark’s (H’s) negative face as it goes against his discursive autonomy: his thoughts indicate that he does not wish to talk about this taboo subject because it makes him uncomfortable.

Just as bad language is varied in its form and content, so are its effects on Speaker-Hearer interactions. Because bad language can cause a number of FTAs, this motivates speakers to avoid tabooed language in order to save face. Issues of censoring are inherently issues of face maintenance, and this seems to be reflected by the tendency to suppress bad language in the aim of preserving social mores as we have seen. Although the maintenance of our own face is of primary concern, we are capable of applying politeness standards to other people, to make judgments about the appropriateness of *bad language* use. Knowledge of politeness standards allows us to speculate on the likelihood of certain linguistic behavior as well.
3.5 When is *bad language* appropriate?

Politeness standards guide our perceptions of bad language, and they help us to determine under which circumstances bad language is appropriate in private discourse. Speakers’ swearing behavior is dependent on the context of speech (which varies largely according to the physical environment and the parties involved) as “pragmatically, swearing can be understood in terms of the meanings it is taken to have in particular circumstances and what it achieves in any particular circumstance” (Wajnryb 2005: 24). English speakers’ beliefs on taboo language use were tested in a study conducted by cognitive psychologists Jay and Janschewitz (2008), “The Pragmatics of Swearing.” The study gauged participants’ judgments of appropriate contexts for swearing, with attention paid to participants’ gender and knowledge of English. The participants in the study were 121 undergraduates at the University of California at Los Angeles (68 native English speakers\(^\text{21}\), 53 non-native speakers\(^\text{22}\)). Participants were given questionnaires that presented scenarios with swearing by different speakers in different environments. The hypothetical speakers were a university Dean, Janitor and Student, as they represented different levels of occupational prestige, and the locations were a Dean’s office, a Parking garage, and a Dorm room, environments which presumably warranted particular language use by the theoretical speakers. Participants were asked to rank the likelihood and the offensiveness of taboo language as used by the speakers in each environment. The taboo words were equally divided among three levels of taboorness, with the low-taboo words *crap, hell,* and *idiot,* medium-taboo words *bastard,* *goddamn,* and *piss,* and high-taboo words *cocksucker,* *cunt,* and *fuck.* The questions were based on this model: “How likely would it be to hear a dean say “idiot” in a dorm room?” (Jay et al.,

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\(^{21}\) 41 women, 27 men; age M = 20.27, SD = 1.97 years

\(^{22}\) 34 women, 19 men; age M = 20.75, SD = 2.44 years
Participants’ offensiveness rankings are displayed in the charts from Figure 4 below:

**Figure 4**: Offensiveness rankings of swearing by a Dean, Janitor, and Student; 1 is low offensiveness, 7 is high offensiveness (Jay et al., 2008: 278)

It seems that overall it is most offensive for anyone to swear in a Dean’s office, it being a highly professional environment likely to have mixed company (interlocutors of varying age, gender and/or social status). While it would be moderately offensive for a Dean or Janitor to swear in a Dorm room, presumably because their presence would be in a professional capacity, it would be very inoffensive for a student to swear in a dorm room as it is their ‘home turf,’ so to speak. The environment in which swearing was judged least offensive was a Parking Garage, perhaps due to several factors. For the majority of speakers, a Parking Garage is not a professional environment, and as a very informal environment, the rules of politeness are less thoroughly observed. Secondly, there is not a high level of interpersonal interaction: we are in parking garages briefly, to walk to/from our vehicles with our passenger(s), with whom we likely have some established relationship. As such, this environment does not generally sustain long periods of discourse, or lend itself to face-threatening situations.
Participants’ likelihood judgments reflect these environmental considerations as well, as can be seen in the likelihood rankings displayed in the charts from Figure 5 below:

**Figure 5**: Likelihood rankings of swearing by a Dean, Janitor, and Student; 1 is low likelihood, 7 is high likelihood (Jay et al., 2008: 279)

The likelihood and offensiveness of swearing in different environments seem to share an inverse relationship; as it becomes more offensive for a speaker to swear, it is less likely for them to do so and risk losing face. For example, as it was judged highly offensive for a student to swear in a Dean’s Office participants believed it was very unlikely for students to swear in this environment. Results showed that the participants’ level of English experience had no profound effect on their offensiveness and likelihood ratings but that for native speakers, “offensiveness ratings were numerically higher for women \(^{23}\) than men \(^{24}\),” and “the range between the highest and lowest average condition rating was larger for native than non-native speakers” (Jay et al., 2008: 283, 280). This suggests that the higher speakers’ English experience, the more nuanced is their understanding of when it is appropriate to swear.

Overall, this study affirms some general intuitions about swearing in accordance with notions of politeness. The likelihood and offensiveness ratings indicate that the appropriateness

\(^{23}\) M = 3.68, SD = 0.88
\(^{24}\) M = 3.26, SD = 0.86
of swearing is tied to a speaker’s identity, as well as their socio-physical setting. Indeed, according to Jay and Janschewitz “our use of and reaction to swear words tells us who we are and where we fit in a culture; in short, our identities are marked by our use of swear words” (275). Allan and Burridge support this notion, as they state that perceptions of status are determined by interlocutors’ relative status. They note that:

Relative status derives from two sources: the relative power of the interlocutors and the social distance between them… [and this] Social distance between interlocutors is determined by such parameters as their mutual (un)familiarity, comparative ages, genders and socio-cultural backgrounds.

(Allan and Burridge 2006: 77)

It should be noted that speakers of a language understand the mechanics of swearing regardless of their personal swearing habits, as “it is well documented that even people with a reputation for not swearing know how to swear, an ability that they may come to demonstrate if they suffer some kind of brain decay or brain damage in later life” (Allan and Burridge 2006: 78).

Therefore, the data from Jay and Janschewitz’ study is valuable as it is based on participants’ informed speculations relevant to their understanding of politeness expectations. The study reveals that English speakers have some consensus on when and why bad language is inappropriate, according to factors such as speakers’ occupational prestige and notions of politeness in regards to status. It even shows that speakers of a language understand when the use of such bad language is appropriate. This brings us to question how bad language may be used appropriately, and to what end. Controversial language is met on all sides by criticism, and yet

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25 A well-known example of this is the case of railroad worker Phineas Gage (1823-1860). In 1848, a tamping iron rod that Gage was using to pack explosive powder penetrated his skull and passed through his brain after the powder exploded unexpectedly, propelling the rod. The doctor who treated Gage wrote that friends found his pre- and post-accident personalities in direct contrast to one another, noting that after the accident he was now prone to speaking “the grossest profanity,” whereas before he did not swear (Twomey, 2010).
its use persists in private discourse. There are many factors that influence speakers’ decision to use bad language, and we will discuss several in the following section.

3.6 Functions of bad language in private discourse

Our swearing is governed by our own and others’ social needs as they fluctuate with the formality of our environment, and some situations allow tabooed language more than others. The use or avoidance of bad language is a matter of linguistic style. Our speech style is determined by the following:

- Who we are and whom we are communicating with;
- Whether we are speaking or writing;
- Where we are and when the utterance takes place;
- What we are talking about; and
- How we feel about the whole situation.

(Allan and Burridge 2006: 75)

We have explored how bad language is used in relation to interlocutor identity, speech environment, and speech form and content, as well as the various feelings on bad language. We now seek to explain why our styles shift to include or exclude the use of bad language. The motivations behind the use or disuse of bad language in private discourse change depending on the individual and their interlocutor(s). Ruth Wajnryb suggests that swearing can be separated on the basis of intention, into “broad domains of achievement – catharsis, aggression, and social connection” (Wajnryb 2005: 25).

The first category concerns bad language and the individual, as speakers may swear for cathartic purposes. Cathartic swearing most often takes the form of an expletive, a type of expressive emotional swearing. Expletives are “reflexive” because “[often they are] turned in on
the user,” as opposed to directed at an addressee\(^\text{26}\) (Wajnryb 2005: 19). Typically said in response to some sudden and often unpleasant stimulus, expletives are aptly referred to as “stub-your-toe” swearing. This reactionary and reflexive nature is evident as exclamations such as fucking hell! and fuck me! are not intended to convey any literal meaning, as they are simply emotive outbursts\(^\text{27}\). In a study on cathartic swearing, Stephens, Atkins and Kingston (2009) found that participants were able to withstand “a moderately to strongly painful stimulus for significantly longer if they repeated a swear word rather than a nonswear word” (4). Swearing coincided with an increase in heart rate and a lowered sensitivity to pain perception. This study indicates that cathartic swearing actually does soothe the swearer, as data showed that “swearing, rather than being a maladaptive pain response, actually produces a hypoalgesic (pain lessening) effect” (Stephens, Atkins and Kingston 2009: 4). Swearing seems therefore to be an effective response to pain. However, in order for cathartic swearing to retain its effectiveness, speakers must not over-use this speech strategy, as in a follow-up study Stephens and Umland (2011) found that “people who swear more often in daily life experience a lesser emotional response to swearing…because of habituation to the stimulus of swearing” (1278). So while it might seem that expletives are the answer to all of life’s minor aches and pains, swearing as a preventative health care measure is unadvisable (damn).

The second domain of achievement, aggression, is fairly straightforward: bad language is used to abuse the addressee(s) and/or to create distance between interlocutors. Aggressive bad language often takes the form of abusive swearing. Abusive swearing is the use of “swear words that are directed toward others (‘You fucker’); derogatory in tone (‘This is a shitty piece of

\(^{26}\) Although expletives generally lack an addressee, as previously noted they may be offensive to a hearer as they reveal a “loss of decorum” (Wajnryb 2005: 19).

\(^{27}\) It is unlikely that anyone would describe hell as a sexual agent (re: fucking hell), or be extending a sexual invitation to no one in particular (re: fuck me) when these phrases are uttered after the speaker sustains some injury.
work’); involve metaphoric curses (‘Go to hell!’); or denigrate through name-calling (‘You bastard’)” (Wajnryb 2005: 17). Name-calling begins in childhood (poo poo head) and continues into adulthood (shithead), as swearing lexicons develop with age. More often than not, name-calling is based on perceived differences between the speaker and the addressee. For example, “names such as, fatty, four eyes, carrot top (physical), goofy, weirdo, or spaz (psychological), and fag, wimp, or slut (social)” indicate “a discrepancy between ‘normal’ [speakers]…and deviant [addressees]” (Jay 1992: 25). As these examples show, name-calling does not necessarily employ swearing, but may just focus on the tabooed qualities of an addressee (their physical, mental, or social ‘failings’). Speakers in this way highlight their own ‘normalcy’ by revealing the addressee’s ‘abnormal’ aspects, furthering the social distance between speaker and addressee. One’s aggressive use of bad language connotes “toughness and strength,” which increases the speaker’s covert prestige (Andersson and Trudgill 1990: 8-9). When bad language is used in an intentionally bad way (as to hurt others), it fortifies a speaker’s reputation as a formidable individual, which is valuable to some people.

Like aggression, the third domain of achievement concerns bad language use and the other. In this category, swearing is used as a means of social cohesion. Speakers’ bad language may indicate their belonging in social circles in that “swearing can act as an in-group solidarity marker within a shared colloquial style” (Allan and Burridge 2006: 77). If we attempt to fit in with a group that uses a heavy swearing style, we are likely to converge linguistically and alter our style to match the group. The informal register of swearing “signals and builds in-group membership,” as the common use of bad language promotes solidarity among interlocutors (Wajnryb 2005: 175).
Bad language may be used as an outlet for personal pain, as a means of abuse, and as a method of bridging social distance and strengthening ties between interlocutors. Speakers choose to swear or to avoid swearing or the mention of taboo subjects based on the interlocutors’ prestige, speech environment, and social goals. We have seen that speakers of a language have a comprehensive knowledge of swearing that is independent of their own speech habits. Also, we have explored how the concept of taboo influences language choice and the treatment of bad language. The reasons behind the negative evaluation of bad language were reviewed, and such language was defined as bad in private discourse according to its 1. Word form (swearing) and 2. Referential content (taboo). Now that we have laid the groundwork for how bad language is treated in private discourse, we may approach the treatment of bad language as it appears in public discourse.

4. Public discourse and bad language

In the public discourse of the United States, bad language is determined to be bad by the state and the courts. Earlier we defined public discourse as including speech that appears in the media and government institutions; we may broaden our definition to include speech that is directed at the public (either by an individual, the media, or the government), and/or takes place in a public area. In order to take a closer look at what constitutes bad language in public discourse, we must first analyze the broad categories of protected vs. unprotected speech.

4.1 (Un)protected speech and the First Amendment

Protected speech encompasses all modes of expression that are constitutionally sanctioned by the First Amendment, which reads as follows:
Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

(U.S. Constitution)

As this assertion is rather broad sweeping, First Amendment Jurisprudence is a highly evolving territory that has been modified many times over the years. Speech as defined by the United States Supreme Court includes language (both uttered and written) and symbolic actions. While speech is defined in terms of action as well as language, we are primarily concerned with (un)protected speech as it is manifested in spoken and written form, and so will focus on just a few of the subsets of (un)protected speech. According to the United States Courts, the First Amendment guarantees the right:

- To use certain offensive words and phrases to convey political messages.
  ("What Does Free Speech Mean?": emphasis added)

The First Amendment does not give the right:

- To incite actions that would harm others (e.g., “[S]hout[ing] ‘fire’ in a crowded theater.”).
- To make or distribute obscene materials.
- Of students to make an obscene speech at a school-sponsored event.
  ("What Does Free Speech Mean?": emphasis added)

How the courts define linguistic content as (un)protected is a matter of great interest and debate, and we will examine this process through an analysis of several cases that involved challenged speech.

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28 For a more detailed list of what constitutes (un)protected speech, see Appendix A.
4.2 Unprotected speech: *Incitement*

The first category of unprotected speech is that speech which would incite harm to others. Such speech was first defined in *Schenck v. United States* (1919). Appellant Charles Schenck, a socialist, had attempted to mail thousands of anti-draft flyers to men who had recently been drafted to fight in the First World War. The flyers likened the draft to slavery (“A conscript…is forced into involuntary servitude”) and urged draftees to protest conscription (“Do not submit to intimidation”) (*SCHENCK v. UNITED STATES*). Schenck was charged with violating the Espionage Act\(^\text{29}\) and as he believed this to be a violation of his freedom of speech, the issue was brought to the Supreme Court (McBride, 2006). The Court found that Schenck’s actions did not constitute protected speech as they claimed his protest had the potential effect to arouse violence based on the logic that “the character of every act depends upon the circumstances in which it is done” (*Schenck v. United States*, 1919: 52-53). In effect, to protest the draft in wartime would cause an uproar as a result of existing national tension, but to protest the draft in peacetime would be acceptable as it would be less likely to cause upheaval. The Court further analogized, stating that

> The most stringent protection of free speech would not protect a man in falsely shouting fire in a theatre and causing a panic. It does not even protect a man from an injunction against uttering *words that may have all the effect of force*.

(*Schenck v. United States*, 1919: 52-53; emphasis added)

In this case, Schenck’s speech was considered to have the power to incite terror among the people, and it was the potentially deleterious effects of his speech that were targeted by the Court. It was the priority to ensure that the possible negative consequences of Schenck’s speech did not

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\(^{29}\) The government claimed that Schenck violated this act by “conspiring ‘to cause insubordination … in the military and naval forces of the United States’” (McBride, 2006).
come to fruition, and this took precedence over freedom of expression. Furthermore, this case narrowed the parameters of protected speech, as the Court stated:

The question in every case is whether the words used are used in such circumstances and are of such a nature as to create a clear and present danger that they will bring about the substantive evils that Congress has a right to prevent.

(Schenck v. United States, 1919: 52-53; emphasis added).

The doctrine of “clear and present danger” reveals the motivation behind the state’s censorship of injurious speech. It is the state’s responsibility to protect the people from harm, and this gives the government the right to curb behavior for the greater good of the nation. The state is in a paternalistic way protecting us from ourselves, and the focus of censorship here is not on the form of the targeted language itself, but rather its potential to incite harmful actions.

The incitement category of unprotected speech encompasses what are known as “fighting words.” The fighting words doctrine was created in Chaplinsky v. State of New Hampshire (1942) and placed further limitations on freedom of expression. Appellant Walter Chaplinsky, a Jehovah’s Witness, was handing out pamphlets on a public sidewalk and had attracted a large crowd as he was “denouncing all religion as a ‘racket’” (Chaplinsky v. New Hampshire, 1942: 570-571). His display garnered the complaints of many passerby, and he was given a warning by a City Marshall, Bowering; shortly thereafter, a nearby traffic officer took Chaplinsky into custody due to the disturbance, without informing Chaplinsky of any intent to arrest. On their way to the police station, the traffic officer and Chaplinsky ran into Marshall Bowering, who reiterated his earlier warning because he had heard that Chaplinsky’s petitioning had incited a riot. In response, Chaplinsky called Bowering “a God damned racketeer” and “a damned
"Fascist" (Chaplinsky v. New Hampshire, 1942: 569-570). Chaplinsky was arrested for harassing the police officer, and later convicted of violating a New Hampshire law which stated:

No person shall address any offensive...word to any other person who is lawfully in any street or other public place...with intent to deride, offend or annoy him, or to prevent him from pursuing his lawful business or occupation.

(Chaplinsky v. New Hampshire, 1942: 569-570)

Under this law it was illegal to verbally harass others in a public space with the intent to harm the interlocutor. We saw earlier that such abusive use of bad language in private discourse is not unheard of, but in the case of public discourse it is not allowed. When this case reached the Supreme Court, they affirmed the constitutionality of the New Hampshire law. In their decision, the Court clarified the boundaries of free speech, stating that:

There are certain well-defined and narrowly limited classes of speech, the prevention and punishment of which has never been thought to raise any Constitutional problem. These include the lewd and obscene...and the insulting or 'fighting' words-those which by their very utterance inflict injury or tend to incite an immediate breach of the peace.

(Chaplinsky v. New Hampshire, 1942: 571-573; emphasis added)

As in Schenck v. United States (1919), the Court found that the targeted language (the epithets used by Chaplinsky) was not protected under the First Amendment as it had the effect to dangerously disturb the peace, to provoke and incite the interlocutor(s) to action. The Court had no particular objection to the individual forms of the words used (damned Fascist), but rather objected to their abusive content and intent. Words of incitement are seen by the state to have a

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30 Epithets include any “defamatory or abusive word or phrase” (Wajnryb 2005: 18).
strong causal relationship to behavior, as according to “the theory that words injure…offensive language is more likely than polite language to cause breaches of the peace and thus ought to be restricted” (Battistella 2005: 74).

In the cases of Schenck v. United States (1919) and Chaplinsky v. State of New Hampshire (1942), the speech was declared unprotected on the grounds of its potential incitement. The taboo nature of language that could create a “clear and present danger” or “incite an immediate breach of the peace” is rather evident, as it is the aim of the government to preserve a safe environment for the citizenry and restrict any behavior that could compromise this safety. The speech that was targeted in these cases was a part of public discourse in that the speech was directed at the public (as at the draftees), and/or occurred in public (on the street).

Unprotected speech also includes any speech that is in some way obscene, and so we must now look to how obscene content is treated in public discourse. The following sections will serve to highlight influential cases that helped to further define the treatment of bad language in public discourse in relation to First Amendment Jurisprudence and obscenity: Butler v. Michigan (1957), Federal Communications Commission v. Pacifica Foundation (1978), and Cohen v. California (1971). The content of the objectionable speech in all cases violated conventional taboos of the time, and in some cases its word form (swearing) was the object of criticism as well.

4.3 Unprotected speech: Obscenity

Obscene speech is not protected under the First Amendment, and as a subset of unprotected speech, its definition is of great interest. Of course, obscenity is defined across several contexts. In terms of private discourse, obscenity may be indicative of “swearing through
the explicit use of indecent or taboo words to refer to intimate parts of the body and the body’s functions and products (for example, ‘shit’ or ‘f*ck’)” (Wajnryb 2005: 20). However, in terms of public discourse, obscenity is defined more broadly than by its explicit linguistic form: it is obscene according to its referential content. The unprotected nature of obscene speech was established in Roth v. United States (1957). In this case, the Court declared the following:

Obscenity is not within the area of constitutionally protected freedom of speech or press - either (1) under the First Amendment, as to the Federal Government, or (2) under the Due Process Clause of the Fourteenth Amendment, as to the States.


Obscene speech is therefore unprotected on all fronts, on both a federal and state level. In a later case, Miller v. California (1973), the Court adopted a three-prong obscenity test that is still used to this day. In order for the Court to judge material as obscene, it must consider the following conditions:

- Whether "the average person, applying contemporary community standards" would find that the work, taken as a whole, appeals to the prurient interest,
- Whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law, and

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31 Roth v. United States (1957) concerned the mailing of obscene advertisement and the sale of obscene books by the appellant Roth, who ran a mail-order book business out of New York City ("ROTH v. UNITED STATES").
32 This test is also known as The Miller Test. In Miller v. California (1973), Marvin Miller "was convicted of mailing unsolicited sexually explicit material in violation of a California [obscenity] statute"; Miller had mass-mailed brochures advertising the pornographic books “Intercourse,” “Man-Woman,” “Sex Orgies Illustrated,” “An Illustrated History of Pornography,” and a pornographic film, "Marital Intercourse" (Miller v. California, 1973: 15-16, 18-19).
33 The so-called prurient interest was defined in Roth v. United States (1957) thusly: “Obscene material is material which deals with sex in a manner appealing to prurient interest – i.e., material having a tendency to excite lustful thoughts.”
• Whether the work, taken as a whole, lacks serious literary, artistic, political, or scientific value.

(Miller v. California, 1973: 15)

Therefore it seems that speech (in symbolic or uttered forms) must be sexually explicit in some aspect in order to be defined as obscene. However in common parlance, what is said to be obscene is often alternately referred to as indecent. This equivalent usage of the terms indecent and obscene is present in United States law as well. Section 1461 (Mailing obscene or crime-inciting matter) of Title 18 of the United States Code (U.S.C.) refers to content interchangeably as being obscene and indecent, stating that “every obscene, lewd, lascivious, indecent, filthy or vile article, matter, thing, device or substance...is declared to be nonmailable matter” (18 U.S.C. § 1461 [1976 ed.]). The section concludes with the following definition of indecent: “The term ‘indecent’, as used in this section includes matter of a character tending to incite arson, murder or assassination” (18 U.S.C. § 1461 [1976 ed.]; emphasis added). It would seem from this law that both obscene and indecent content are not protected by the First Amendment, as they are in some way undesirable to society; obscene content is patently offensive to the community and thereby harms the public, and indecent content is harmful to the public in that it may incite acts of violence. However, in contrast to § 1461’s definition of indecent content, which directly links indecency to incitement, indecent speech is actually constitutionally protected (Consumer Guide 2013). This discrepancy between the state’s definition of indecent and the Court’s definition warrants a closer look, which we shall discuss in later sections. Before we discuss the distinction between indecency and obscenity we must first analyze why obscene content is deemed harmful to the public, through a look at Butler v. Michigan (1957).

34 Title 18 - Crimes and Criminal Procedure details, as the title indicates, Federal criminal law of the United States. The section discussed here falls under Chapter 71 – Obscenity.

35 Prior to 1955, § 1461 referred to nonmailable material more specifically as “every...lascivious or filthy book, pamphlet, picture paper, letter, writing, print, or other publication of an indecent character” (18 U.S.C. § 1461 [1976 ed.]).
4.4 Obscenity and the youth: *Butler v. Michigan* (1957)

In October 1956, the United States Supreme Court heard the arguments for a case that would set a legal precedent for the censorship of *obscene* material: *Butler v. Michigan*. At the time of the case, Section 343 of the Michigan Penal Code made it “a misdemeanor to sell or make available to the general reading public [child or adult] any book containing obscene language ‘tending to the corruption of the morals of youth’” (Butler v. Michigan, 1957: 380-381). The offending material at the heart of *Butler v. Michigan* was a 1952 novel written by John Howard Griffin entitled *The Devil Rides Outside*, which told the story of a young man’s attempts to stifle his sexual desires in a bid for a life of abstinence. Unsurprisingly, the novel contained overtly sexual language which earned it the obscene label, as is shown in the following quote from the book’s narrator: “‘a vision of strong legs, deep navels, bursting milk-white breasts—insatiable, grasping, choking triangles of pubic greyness before my eyes’ ” (Calvert 2012: 253).

The appellant, Alfred E. Butler, sold a paperback copy of *The Devil Rides Outside* to a Detroit police inspector and was subsequently levied with a one hundred dollar fine in accordance with Section 343. Butler’s attempt to dismiss the case in the initial trial was unsuccessful and eventually it reached the Supreme Court. In the trial, the Solicitor General of Michigan made the argument that the only way of ensuring the welfare of the youth was to shield both adults and children from consuming offending material. Thereby, it was necessary to censor the material that was available to adults in order to protect children, on the offhand chance that the children encounter the offensive material (Calvert 2012: 255). This argument was not found to be substantial, and Frankfurter dismissed this defense, stating:

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36 Butler was not only aware of the risk involved in this transaction, it seems he actually sold the book as a calculated move in order to take the issue to court. Butler had a particular interest in this issue of censorship, as he “was no ordinary bookseller [but rather] the Detroit district sales manager for Pocket Books...America’s first paperback publisher” (Calvert 2012: 253-254).
We have before us legislation not reasonably restricted to the evil with which it is said to deal. The incidence of this enactment is to reduce the adult population of Michigan to reading only what is fit for children.

(Butler v. Michigan, 1957: 383-384)

Furthermore, Frankfurter stated that this argument for blanket censorship was illogical and condemned Michigan’s law as being overbroad:

The State [of Michigan] insists that, by thus quarantining the general reading public against books not too rugged for grown men and women in order to shield juvenile innocence, it is exercising its power to promote the general welfare. Surely, this is to burn the house to roast the pig.

(Butler v. Michigan, 1957: 383-384)

The State of Michigan’s initial censorship of the ‘obscene’ language in *The Devil Rides Outside* was motivated by a desire to protect the young from sexual content that was inappropriate to their age group. This is one of the most common arguments against obscene material, the idea that obscene speech may in some way harm its public audience. Nevertheless, the obscene material in the novel could not reasonably be construed as harmful to a consenting adult audience. In this case, the obscene speech did not make its way into the hands of a minor as the novel was sold to an adult man, a police officer. The Court found that the Michigan law against the selling of books containing obscene language was inapplicable in the case of the Butler transaction, and further found the law to be too far-reaching in its scope. Ultimately, the decision of Butler resulted in a “victory for consenting adults to access and receive materials that, in the determination of legislative bodies, are not suitable for minors” (Calvert 2012: 255-256).

37 This finding brought to light the need for “legislative bodies…to draft more narrowly tailored laws in the future to protect adults’ rights to receive speech while simultaneously shielding minors from alleged ills of speech” (Calvert 2012: 255-6).
The exact nature of the bad language from *The Devil Rides Outside* was not of central concern to Court, and in the end the Court did not make any claims as to whether the sexual content was indecent or obscene. If the Court had labeled the bad language as obscene this would have little to no effect on the material as this case predated *Roth v. United States* (1957), the case which established obscene speech as unprotected, by several months. Our review of *Butler* gives us greater insight on the American social mores that dominated during the time in which the anti-obscene speech doctrine was first adopted. Obscene speech is suppressed with the goal of protecting the public audience (in particular, the young) from its taboo and thereby dangerous content.

Now that we have some idea of how obscene speech is seen as dangerous, and therefore unprotected, we will seek to understand the boundaries of obscene speech. The second case that we will analyze, *FCC v. Pacifica Foundation* (1978), tested the Court’s distinction of obscenity and indecency.

4.5 Obscenity v. Indecency

*FCC v. Pacifica Foundation* (1978) concerned bad language that entered into public discourse through the broadcast medium. As the controversial speech at the heart of the case was dispersed to the public through the broadcast media, we must first examine how the modern American media separates obscene and indecent content according to government regulation. In the United States, broadcasting material is subject to the rules and regulations of the Federal Communications Commission (FCC). The FCC states in its *Consumer Guide on Obscene, Indecent and Profane Broadcasts* that:

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38 The language was deemed obscene by the original trial judge.
It is … a violation of federal law to air indecent programming or profane language during certain hours. …[and] The FCC may revoke a station license, impose a monetary forfeiture or issue a warning if a station airs obscene, indecent or profane39 material.

Profane and indecent content is strictly prohibited from broadcasts airing between 6 a.m. and 10 p.m. on the radio and television and, as mentioned above, the FCC has the power to penalize stations that do not comply with this rule. In its Consumer Guide, the FCC states that it follows the Supreme Court’s three-pronged obscenity test when reviewing controversial material. It also notes the Commission’s assessment of indecent material, stating:

broadcast indecency [is] ‘language or material that, in context, depicts or describes, in terms patently offensive as measured by contemporary community standards for the broadcast medium, sexual or excretory organs or activities.’ Indecent programming contains patently offensive sexual or excretory material that does not rise to the level of obscenity.

(Consumer Guide 2013: emphasis added)

This language is very similar to the state’s definition of obscenity, in that it evokes judgments based on contemporary community standards and sexual themes (for good measure, the FCC includes excrement here as well). It seems that the FCC’s vague definition of indecent material is predicated largely on the established definition of obscenity: it is almost as though they are saying that indecent content is obscene-ish. As indecent material is defined here in the same terms as obscene material, it is difficult to determine what separates the two. It seems that this judgment, at least for the purposes of the FCC, is rather subjective. The current FCC regulations regarding indecent broadcast programming arose from the decision on FCC v. Pacifica Foundation (1978).

39 The FCC “has defined profanity as ‘including language so grossly offensive to members of the public who actually hear it as to amount to a nuisance.’” (Consumer Guide, 2013).
4.5.1 FCC v. Pacifica Foundation (1978)

The case of *FCC v. Pacifica Foundation* (1978) arose from a complaint about a radio broadcast of comedian George Carlin’s monologue, “Filthy Words” (also commonly known as “7 words you can’t say on television”). The following is a short excerpt from a transcript of the broadcast demonstrating the language that prompted the complaint:

I was thinking about the curse words and the swear words, the cuss words and the words that you can't say, that you're not supposed to say all the time… Okay, I was thinking one night about the words you couldn't say on the public, ah, airwaves, um, the ones you definitely wouldn't say, ever… and it came down to seven but the list is open to amendment…The original seven words were, *shit, piss, fuck, cunt, cocksucker, mother-fucker, and tits.*


The controversial broadcast aired in the early afternoon on a weekday, from a radio station in New York that was owned by the Pacifica Foundation. The FCC complaint was lodged by a man who had unwittingly tuned in to the monologue from his car radio while driving with his minor son. The circumstances surrounding the broadcast of “Filthy Words” are noted in the Supreme Court decision as follows:

[According to Pacifica] the monologue had been played during a program about contemporary society's attitude toward language and that, immediately before its broadcast, listeners had been advised that it included ‘sensitive language which might be regarded as offensive to some.’


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40 Included in the Supreme Court’s decision on FCC v. Pacifica is an appendix of “a verbatim transcript of ‘Filthy Words’ prepared by the Federal Communications Commission”. As a point of interest, the full transcript is included in this work as Appendix B.
As opposed to censoring the language of the broadcast, the radio station provided a warning about its content prior to airing. In its response to the FCC complaint, Pacifica noted that in the broadcast “Carlin is not mouthing obscenities, he is merely using words to satirize as harmless and essentially silly our attitudes towards those words” (FCC v. Pacifica, 1978: 730-731). It is clear however that the form of the bad language, its swearing content, was what initiated the original complaint. Carlin’s use of the swear words in his monologue (which he ironically noted to be unacceptable for the “public airwaves”) was partially referential, in that he spoke about their different contextual usages for comedic effect. Take for example, Carlin’s analysis of cock: “cock is a half-way dirty word, 50% dirty - dirty half the time, depending on what you mean by it…And the cock crowed three times… the cock - three times. It's in the Bible, cock in the Bible” (FCC v. Pacifica, 1978: 752-753). Here, Carlin refers to conflating the ‘polite’ meaning with the taboo meaning of the word cock (i.e. rooster vs. penis), playing on the referential context of the word. Had Carlin discussed cock without alluding to its sexual connotations, it would not have elicited criticism (or laughs). Of course, Carlin also mapped out conventional curse words and phrases in his monologue through various other examples in a less analytic manner presumably to exhaust all uses of particular curses, as in “I’ve had that shit up to here. I think you’re full of shit myself…Shit on a stick. Shit in a handbag...” (FCC v. Pacifica, 1978: 753-754).

The FCC, in contrast to Pacifica’s claims, described the monologue’s language as patently offensive:

The [FCC] characterized the language used…as ‘patently offensive,’ though not necessarily obscene, and expressed the opinion that it should be regulated by principles analogous to those found in the law of nuisance where the ‘law generally speaks to channeling behavior more than actually prohibiting it…[T]he concept of `indecent' is intimately connected with the exposure of children to language that describes, in terms patently offensive as measured by contemporary community standards for the broadcast
medium, sexual or excretory activities and organs, at times of the day when there is a reasonable risk that children may be in the audience.’

(FCC v. Pacifica, 1978: 731-733)

It seems that indecent language is patently offensive according to “contemporary community standards”, and that patently offensive content may be obscene (but this does not mean that patently offensive = obscene):

\[
\text{patently offensive} \quad \leftrightarrow \quad \text{indecent}
\]
\[
\text{obscene} \quad \rightarrow \quad \text{patently offensive}
\]
\[
\text{patently offensive} \quad \nRightarrow \quad \text{obscene}
\]

This clarifies some of the language used in the Court’s obscenity test. It seems that like obscenity, indecency is determined by the interplay between patently offensive content and the age group of its audience. Therefore, certain indecent content may be deemed appropriate for adults, but not for children, as we have seen in Butler v. Michigan (1957).

The Court found in favor of the FCC’s request to prohibit indecent speech from daytime broadcasts, and this remains in effect today. What is interesting is that indecent and obscene content are treated as equally dangerous for an adolescent public audience, as obscene content is prohibited outright from broadcast, and indecent content is channeled to times where it is unlikely for a child to tune in. We know that swearing does not necessarily equate with obscenity, as swearing gains its obscene nature from its taboo referential content. Furthermore, it is likely that the words bastard, hell, and damn, which Carlin uttered, were not the words that prompted the complaint against the broadcast. We can assume therefore, that Carlin’s speech was challenged on the basis of its sexual referential content, as well as its word form. In regards to the censoring of speech such as that from Carlin’s monologue the Court stated: “the constitutional protection accorded to a communication containing such patently offensive sexual
and excretory language need not be the same in every context.” (FCC v. Pacifica, 1978: 747-748). As Carlin’s speech was deemed to be indecent, it was ultimately protected under the First Amendment, albeit restricted under FCC regulations. Carlin’s speech it could not be construed as unprotected speech as it did not in some way incite violent action, nor could it be claimed to promote obscene acts (if it promoted any action, it would be the linguistic behavior of swearing).

We have seen bad language (obscene and indecent) as it is embodied in the media, presented to the public in printed and broadcast forms. In both instances, the bad language centered on sexual themes and was objected to on the paternalistic grounds of protecting the youth. Our final case to be discussed, Cohen v. California (1971), concerned bad language that entered public discourse through public display.

4.6 Public display of bad language: Cohen v. California (1971)

On April 26, 1968, Paul Robert Cohen was arrested for wearing a jacket emblazoned with the phrase Fuck the Draft in the Los Angeles County Courthouse. He was charged with violating the California Penal Code 415, specifically the section which prohibits “maliciously and willfully disturb[ing] the peace or quiet of any neighborhood or person…by…offensive conduct”, and was sentenced to 30 days’ jail time (Cohen v. California, 1971: 15-16). The particular circumstances surrounding his arrest are noteworthy, as Thomas G. Krattenmaker explains in his retrospective on the case:

Interestingly, when Cohen entered the courtroom, he removed his jacket…Meanwhile, a police officer sent the presiding judge a note suggesting that Cohen be held in contempt

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41 This is consistent to the Court’s claim in Schenck v. United States (1919) that Schenck’s protest of the draft would have been legal in other contexts, i.e., in peacetime.
[which the judge declined] and Cohen was arrested by the officer after he left the courtroom.

(Krattenmaker 2011: 659-660)

Cohen only wore the jacket in view of others in the less formal areas of the courthouse, but as the Courthouse is a government property, all areas within it may be considered a public area. It is in this way that Cohen’s speech entered into public discourse, as he was in a public setting.

Also of interest is the Court’s note in the exposition to the case that “there were women and children present in the corridor” (Cohen v. California, 1971: 16-17). This is rather revealing of the social mores of the time, and like our previous cases concerning (un)protected speech, it seems that the targeting of Cohen’s message was primarily motivated by his supposedly objectionable audience. Presumably, adult women were categorized along with children as requiring protection from obscene speech. Although fuck is an active character in discourse today, at the time of the case it was generally unspoken:

Quaint or even sexist as these facts [the Court’s note on the exposure of women and children to the jacket] may appear today, the word was rarely spoken by women or employed by men when women were present, even in private settings. It was not merely that the ‘F word’ was not spoken on radio or television; in conventional American society, ‘fuck’ was not spoken where people whom the speaker did not know might overhear it.

(Krattenmaker 2012: 654)

42 Krattenmaker notes as a prominent example the popularity of the 2010 song Fuck You by Cee Lo Green, known for its signature lyric “I see you driving 'round town with the girl I love and I'm like, ‘fuck you!’” (Cee Lo Green, Fuck You). Between its release in August 2010 and December 2011, it sold 5.3 million downloads in the United States alone (Sisario, 2011). The ubiquity of this song in recent years is reflective of the ever-evolving standards of acceptability for swear speech in the public sphere.
Although *fuck* was undoubtedly offensive, the form of this offensive speech was not aggressive in some extreme way, and it could not be claimed that the speech would create a *clear and present danger* among its audience. Because Cohen silently conveyed his message via its display on his person it addressed no one in particular, and did not demand attention. The Court acknowledged this, stating that:

Persons confronted with Cohen's jacket were in a quite different posture than, say, those subjected to the raucous emissions of sound trucks blaring outside their residences. Those in the Los Angeles courthouse could effectively avoid further bombardment of their sensibilities simply by averting their eyes.

*(Cohen v. California, 1971: 21-22)*

Because Cohen’s audience could easily disengage from his message, it was not so disruptive as to warrant the claim that Cohen “maliciously…disturb[ed] the peace,” as his arrest suggests *(Cohen v. California, 1971: 15-16)*. In the original trial, Cohen was found guilty of this charge on the popular notion that the word *fuck* is obscene regardless of its context of use and therefore as obscene language, “it could be proscribed without any further showing, such as a tendency to cause illegal acts, or its being thrust upon unwilling persons, or distributed to minors” *(Krattenmaker 2012: 660)*. Obscene content does not necessarily have any violent or illegal elements, it is purely proscribed due to its lascivious nature, and it is this sexual content that is construed as harmful to the public. However, when it reached the Supreme Court, the contentious language in *Cohen v. California* *(1971)* was not construed as obscene as it in no way appealed to the *prurient interest*\(^4\). The Court noted that the phrase *Fuck the Draft* could not be interpreted in such a literal sexual context as it was not “in some significant way, erotic” *(Cohen

\(^4\) The condition that obscene material appeal to the *prurient interest* was established some years prior, in *Roth v. United States* *(1957)*.
v. California, 1971: 20-21). The bad language of *Fuck the Draft* was negatively evaluated purely on the basis of its word form, as it connoted no taboo sexual elements. Furthermore, Cohen’s expression of anti-war sentiment was not directed at any particular individual, and in this sense could not warrant “the exercise of the State's police power to prevent a speaker from intentionally provoking a given group to hostile reaction” in accordance with the fighting words doctrine (Cohen v. California, 1971: 20-21).

The Court concluded in their ruling that “the State may not, consistently with the First and Fourteenth Amendments, make the simple public display of this single four-letter expletive [*fuck*] a criminal offense” (Cohen v. California, 1971: 15-16). It would seem therefore that the Court is not concerned with word form when it seeks to censor, but rather the referential intent of language. Obscene content is labeled solely on the basis of its sexual reference, as we have seen in *Butler v. Michigan* (1957), and not on the basis of its impolite linguistic form, as we have seen in *FCC v. Pacifica* (1978) and now in *Cohen v. California* (1971). Now that we have discussed the basis on which content is labeled as obscene, and the other types of speech that are unprotected under the First Amendment, we may draw some conclusions on the evaluation of bad language in public discourse and compare this to our earlier observations on bad language as it appears in private discourse.

5. Conclusion

In our initial assessment of bad language, we focused on the realm of private discourse, as it is from here that we derive public notions of appropriate language. We established that bad language was so-called due to its (1) word form, *swearing*, and/or due to its (2) referential content, the *taboo*. In our introduction to swearing, we described several categories: *foul language, blasphemy, profanity, curses, and euphemistic swearing*. This was followed by a
cross-cultural analysis of taboo, its common themes and linguistic manifestations. Taboos generally concern the supernatural, disease, sexual activity, human waste production, and human consumption. In short, taboos arise out of the intimate aspects of the human experience, and are treated with such reverence (or in some instances, fear) as they pertain to our vulnerabilities. In a continuation of this vein, an exploration of denotation and connotation was provided in terms of dysphemism, orthophemism, and euphemism: “coping mechanisms” that we use to navigate bad language in private discourse.

It was established that bad language is not inherently bad, but rather accumulates its negative connotations over the course of time, as in the case of the words *shit* and *cunt*. Negative evaluations of bad language and methods of its censoring were introduced, and analyzed through politeness theory as it pertains to face maintenance. Motivations behind the use of bad language and judgments of its appropriateness entered the discussion. We saw that speakers may employ bad language as a means of catharsis (as in the use of expletives in response to pain), as a means of aggression (as in the use of name-calling to deride the interlocutor), and as a means of social cohesion (as in the imitation of bad language styles that are shared by an in-group). A study on the appropriateness of bad language use, “The Pragmatics of Swearing,” was analyzed. This study showed that participants’ negative evaluations of hypothetical swearing situations were contingent on such contextual factors as the identities of the speakers and interlocutors, as well as the socio-physical setting of speech. Participants judged swearing by a high status speaker, a *Dean*, to be more offensive in most settings than swearing by a low-status speaker, a *Student*. It seems intuitive that these offensiveness judgments also influenced participants’ judgments of the likelihood of certain speakers to use bad language, as they generally found a *Dean* less likely to swear than a *Student*. Although we refer to bad language as bad, it may in some instances
promote the positive, and its qualitative evaluation is highly contextual according to speaker-hearer relationships and the speech environment.

Following our evaluation of bad language in private discourse, we turned the discussion of bad language to its appearance in the public domain. Public speech was defined along the lines of its addressee (the general population) and the environment in which it occurs (a public area). The topic of protected and unprotected speech as it relates to the First Amendment was explored, and our focus was on verbal and written speech as opposed to symbolic action. We found that according to First Amendment Jurisprudence, unprotected speech includes speech that incites harmful action, as in the case of speech that creates a clear and present danger for its audience. In the case of Schenck v. United States (1919), the Court stated that the (un)protected nature of speech may vary according to the situation in which speech occurs. This was affirmed in the decision on Chaplinsky v. New Hampshire (1942), in which the Court stated that “it is well understood that the right of free speech is not absolute at all times and under all circumstances” (Chaplinsky v. New Hampshire, 1942: 571-572). Chaplinsky v. New Hampshire (1942) expanded the boundaries of language of incitement to include fighting words, which it defined as speech which either deliberately provokes its addressee or disturbs the peace. The fighting words and clear and present danger doctrines thus compose the first class of unprotected speech, which encompasses speech that is construed to be injurious in some way to the general public. From this observation, we concluded that the state is motivated to classify such speech as unprotected because it is considered a threat to the American people.

The second class of unprotected speech that we covered includes speech that relates obscene content. Objections to obscene content are largely predicated on the notion that obscenity is injurious in some way to the youth or other impressionable individuals, as evidenced
by the arguments against obscene literature in *Butler v. Michigan* (1957). In the exploration of obscene speech, we analyzed the state’s definitions of obscene and indecent content, concluding that obscene speech must be of a sexual nature that specifically appeals to the *prurient* interest. This is consistent with the Court’s findings in *FCC v. Pacifica Foundation* (1978) and *Cohen v. California* (1971). In *FCC v. Pacifica Foundation* (1978), the swearing in George Carlin’s monologue was ultimately found to be indecent as opposed to obscene, due to the circumstances of its use. The linguistic form of the *bad language* in this case was not the main concern of the Court, rather its critical focus was on the taboo sexual content. Although indecent language was established as protected, it is still subject to government regulation due to its patently offensive content. In *Cohen v. California* (1971), the right to use “certain offensive words and phrases to convey political messages” was affirmed. Paul Cohen’s display of the patently offensive phrase *Fuck the Draft* was construed as protected indecent language according to its linguistic form and referential content. The phrase *Fuck the Draft* was determined by the Court to have no sexual connotation, and therefore was not obscene, as it did not suggest prurient taboo notions.

From these cases it is clear that the Court does not seek to censor speech due to its linguistic form, as to censor speech solely on the grounds that it contains swearing is not substantial. It seems that speech is censored according to its intent (fighting words), as well as its taboo referential content (obscenity), when the speech has the potential to be significantly disruptive and injurious to the public. In public discourse, the link between speech and action is of utmost importance in the distinction between protected and unprotected speech. We may conclude therefore that the state does not strive to censor *linguistic behavior*, but rather seeks to censor *action* as it is inspired by language. Bad language in public discourse is thus targeted on the basis of its potential to harm the public by the provocation of dangerous actions among its
audience. In contrast, bad language is censored in private discourse due to the negative evaluations of linguistic behavior. Speakers in private discourse censor their own and others’ use of bad language to preserve social norms of politeness; of course, politeness norms to not apply to the state as it is an authoritative entity and not subject to social constraints.

Speech is simultaneously spontaneous and formulaic, and this is especially true of that which we refer to as bad language: it takes a certain linguistic form, intent, and/or subject to be considered bad, but may be manipulated in a variety of ways despite these constraints. Swearing in particular presents a rich linguistic tradition, and cross-cultural comparisons of swearing reveal some interesting commonalities shared by different languages. Bad language is generally highly charged in regards to its subject, and so its use is controversial in both private and public discourse. Within private discourse the reactions to bad language vary greatly, as bad language may be met in equal measure with criticism or approval. The opinions of bad language in private may find their way into public discourse, but ultimately the decision to publicly censor speech is derived from its prospectively dangerous consequences. The boundaries of free speech are defined by the state along with the tenuous border of the individual and society. When speech has the effect to substantially threaten the general peace, the welfare of society takes precedence over the individual’s right to freedom of expression. The state takes on the task of regulating speech that relates to action, and in this manner recognizes the inherent power of language. As cultures and language evolve so does the law, and we may conclude with the knowledge that the boundaries of speech will continuously be stretched, broken, and redefined over the coming years.
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Appendix A: “What does free speech mean?” (United States Courts)

The content below is taken directly from the website of the United States Courts.

The following are examples of speech, both direct (words) and symbolic (actions), that the Court has decided are either entitled to First Amendment protections, or not.

Freedom of speech includes the right:

- Not to speak (specifically, the right not to salute the flag).
- Of students to wear black armbands to school to protest a war (“Students do not shed their constitutional rights at the schoolhouse gate.”).
- To use certain offensive words and phrases to convey political messages.
- To contribute money (under certain circumstances) to political campaigns.
- To advertise commercial products and professional services (with some restrictions).
  *Virginia Board of Pharmacy v. Virginia Consumer Council*, 425 U.S. 748 (1976);
- To engage in symbolic speech, (e.g., burning the flag in protest).
  *Texas v. Johnson*, 491 U.S. 397 (1989);

Freedom of speech does not include the right:

- To incite actions that would harm others (e.g., “[S]hout[ing] ‘fire’ in a crowded theater.”).
- To make or distribute obscene materials.
- To burn draft cards as an anti-war protest.
- To permit students to print articles in a school newspaper over the objections of the school administration.
- Of students to make an obscene speech at a school-sponsored event.
- Of students to advocate illegal drug use at a school-sponsored event.
Appendix B: The “Appendix to opinion of the Court” for *FCC v. Pacifica* (1978)

The following is a verbatim transcript of "Filthy Words" prepared by the Federal Communications Commission.

Aruba-du, ruba-tu, ruba-tu. I was thinking about the curse words and the swear words, the cuss words and the words that you can't say, that you're not supposed to say all the time, [']cause words or people into words want to hear your words. Some guys like to record your words and sell them back to you if they can, (laughter) listen in on the telephone, write down what words you say. A guy who used to be in Washington knew that his phone was tapped, used to answer, Fuck Hoover, yes, go ahead. (laughter) Okay, I was thinking one night about the words you couldn't say on the public, ah, airwaves, um, the ones you definitely wouldn't say, ever, [']cause I heard a lady say bitch one night on television, and it was cool like she was talking about, you know, ah, well, the bitch is the first one to notice that in the litter Johnie right (murmur) Right. And, uh, bastard you can say, and hell and damn so I have to figure out which ones you couldn't and ever and it came down to seven but the list is open to amendment, and in fact, has been changed, uh, by now, ha, a lot of people pointed things out to me, and I noticed some myself. The original seven words were, shit, piss, fuck, cunt, cocksucker, mother-fucker, and tits. Those are the ones that will curve your spine, grow hair on your hands and (laughter) maybe, even bring us, God help us, peace without honor (laughter) um, and a bourbon. (laughter) And now the first thing that we noticed was that word fuck was really repeated in there because the word motherfucker is a compound word and it's another form of the word fuck. (laughter) You want to be a purist it doesn't really - it can't be on the list of basic words. Also, cocksucker is a compound word and neither half of that is really dirty. The word - the half sucker that's merely suggestive (laughter) and the word cock is a half-way dirty word, 50% dirty - dirty half the time, depending on what you mean by it. (laughter) Uh, remember when you first heard it, like in 6th grade, you used to giggle. And the cock crowed three times, heh (laughter) the cock - three times. It's in the Bible, cock in the Bible. (laughter) And the first time you heard about a cock-fight, remember - What? Huh? naw. It ain't that, are you stupid? man. (laughter, clapping) It's chickens, you know, (laughter) Then you have the four letter words from the old Anglo-Saxon fame. Uh, shit and fuck. The word shit, uh, is an interesting kind of word in that the middle class has never really
accepted it and approved it. They use it like, crazy but it's not really okay. It's still a rude, dirty, old kind of gushy word. (laughter) They don't like that, but they say it, like, they say it like, a lady now in a middle-class home, you'll hear most of the time she says it as an expletive, you know, it's out of her mouth before she knows. She says, Oh shit oh shit, (laughter) oh shit. If she drops something, Oh, the shit hurt the broccoli. Shit. Thank you. (footsteps fading away) (papers ruffling)

Read it! (from audience)

Shit! (laughter) I won the Grammy, man, for the comedy album. Isn't that groovy? (clapping, whistling) (murmur) That's true. Thank you. Thank you man. Yeah. (murmur) (continuous clapping) Thank you man. Thank you. Thank you very much, man. Thank, no, (end of continuous clapping) for that and for the Grammy, man, []cause (laughter) that's based on people liking it man, yeh, that's ah, that's okay man. (laughter) Let's let that go, man. I got my Grammy. I can let my hair hang down now, shit. (laughter) Ha! So! Now the word shit is okay for the man. At work you can say it like crazy. Mostly figuratively, Get that shit out of here, will ya? I don't want to see that shit anymore. I can't cut that shit, buddy. I've had that shit up to here. I think you're full of shit myself. (laughter) He don't know shit from Shinola. (laughter) you know that? (laughter) Always wondered how the Shinola people felt about that (laughter) Hi, I'm the new man from Shinola. (laughter) Hi, how are ya? Nice to see ya. (laughter) How are ya? (laughter) Boy, I don't know whether to shit or wind my watch. (laughter) Guess, I'll shit on my watch. (laughter) Oh, the shit is going to hit de fan. (laughter) Built like a brick shit-house. (laughter) Up, he's up shit's creek. (laughter) He's had it. (laughter) He hit me, I'm sorry. (laughter) Hot shit, holy shit, tough shit, eat shit, (laughter) shit-eating grin. Uh, whoever thought of that was ill. (murmur laughter) He had a shit-eating grin! He had a what? (laughter) Shit on a stick. (laughter) Shit in a handbag. I always like that. He ain't worth shit in a handbag. (laughter) Shitty. He acted real shitty. (laughter) You know what I mean? (laughter) I got the money back, but a real shitty attitude. Heh, he had a shit-fit. (laughter) Wow! Shit-fit. Whew! Glad I wasn't there. (murmur, laughter) All the animals - Bull shit, horse shit, cow shit, rat shit, bat shit. (laughter) First time I heard bat shit, I really came apart. A guy in Oklahoma, Boggs, said it, man. Aw! Bat shit. (laughter) Vera reminded me of that last night, ah (murmur). Snake shit, slicker than owl shit. (laughter) Get your shit together. Shit or get off the pot. (laughter) I got a shit-load full of them.
(laughter) I got a shit-pot full, all right. Shit-head, shit-heel, shit in your heart, shit for brains, (laughter) shit-face, heh (laughter) I always try to think how that could have originated; the first guy that said that. Somebody got drunk and fell in some shit, you know. (laughter) Hey, I'm shit-face. (laughter) Shit-face, today. (laughter) Anyway, enough of that shit. (laughter) The big one, the word fuck that's the one that hangs them up the most. [']Cause in a lot of cases that's the very act that hangs them up the most. So, it's natural that the word would, uh, have the same effect. It's a great word, fuck, nice word, easy word, cute word, kind of. Easy word to say. One syllable, short u. (laughter) Fuck. (Murmur) You know, it's easy. Starts with a nice soft sound fuh ends with a kuh. Right? (laughter) A little something for everyone. Fuck (laughter) Good word. Kind of a proud word, too. Who are you? I am FUCK. (laughter) FUCK OF THE MOUNTAIN. (laughter) Tune in again next week to FUCK OF THE MOUNTAIN. (laughter) It's an interesting word too, [']cause it's got a double kind of a life - personality - dual, you know, whatever the right phrase is. It leads a double life, the word fuck. First of all, it means, sometimes, most of the time, fuck. What does it mean? It means to make love. Right? We're going to make love, yeh, we're going to fuck, yeh, we're going to fuck, yeh, we're going to make love. (laughter) we're really going to fuck, yeh, we're going to make love. Right? And it also means the beginning of life, it's the act that begins life, so there's the word hanging around with words like love, and life, and yet on the other hand, it's also a word that we really use to hurt each other with, man. It's a heavy. It's one that you have toward the end of the argument. (laughter) Right? (laughter) You finally can't make out. Oh, fuck you man. I said, fuck you. (laughter, murmur) Stupid fuck. (laughter) Fuck you and everybody that looks like you. (laughter) man. It would be nice to change the movies that we already have and substitute the word fuck for the word kill, wherever we could, and some of those movie cliches would change a little bit. Madfuckers still on the loose. Stop me before I fuck again. Fuck the ump, fuck the ump, fuck the ump, fuck the ump. Easy on the clutch Bill, you'll fuck that engine again. (laughter) The other shit one was, I don't give a shit. Like it's worth something, you know? (laughter) I don't give a shit. Hey, well, I don't take no shit, (laughter) you know what I mean? You know why I don't take no shit? (laughter) [']Cause I don't give a shit. (laughter) If I give a shit, I would have to pack shit. (laughter) But I don't pack no shit cause I don't give a shit. (laughter) You wouldn't shit me, would you? (laughter) That's a joke when you're a kid with a worm looking out the bird's ass. You wouldn't shit me, would you? (laughter) It's an eight-year-old joke but a good one. (laughter)
The additions to the list. I found three more words that had to be put on the list of words you could never say on television, and they were fart, turd and twat, those three. (laughter) Fart, we talked about, it's harmless It's like tits, it's a cutie word, no problem. Turd, you can't say but who wants to, you know? (laughter) The subject never comes up on the panel so I'm not worried about that one. Now the word twat is an interesting word. Twat! Yeh, right in the twat. (laughter) Twat is an interesting word because it's the only one I know of, the only slang word applying to the, a part of the sexual anatomy that doesn't have another meaning to it. Like, ah, snatch, box and pussy all have other meanings, man. Even in a Walt Disney movie, you can say, We're going to snatch that pussy and put him in a box and bring him on the airplane. (murmur, laughter) Everybody loves it. The twat stands alone, man, as it should. And two-way words. Ah, ass is okay providing you're riding into town on a religious feast day. (laughter) You can't say, up your ass. (laughter) You can say, stuff it! (murmur) There are certain things you can say its weird but you can just come so close. Before I cut, I, uh, want to, ah, thank you for listening to my words, man, fellow, uh space travelers. Thank you man for tonight and thank you also. (clapping whistling) ”

(FCC v. Pacifica Foundation, 1978)