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### USING PROTOTYPE THEORY TO DETERMINE THE ORDINARY MEANING OF WORDS

#### OPSOMMING

##### Die gebruik van prototipeteorie om gewone betekenis van woorde te bepaal

Hierdie aantekening handel oor die gebruik van die prototipeteorie as 'n manier om die gewone betekenis van woorde te bepaal. Die interpretasie van woorde tydens hofsake staan dikwels sentraal in regsprosedure, waarvan woorde se gewone betekenis meestal aan bod kom. 'n Gewilde wyse waarop 'n woord se gewone betekenis bepaal word, is deur die betrokke woord in 'n woordeboek op te soek. Hoewel woordeboeke geldige hulpbronne is, is dit wel nodig om alternatiewe hulpbronne te ondersoek. Prototipeteorie is 'n bekende taalwetenskaplike benadering waarmee 'n kategorie se beste voorbeeld/tiperendste lid vasgestel word. Betekenis lê op drie vlakke, naamlik die superordinaat, die basiese vlak en die subordinaat. 'n Mens vind prototipes baieal op die basiese vlak en dit is ook hier waar die gewone betekenis van woorde dikwels verskyn. Dit is daarom behulpsaam om die prototipikaliteit van 'n betwiste woord te bepaal. Deur die betwiste woord se afstand van die prototipe te peil, kan 'n mens aflei in hoeverre 'n woord se gewone betekenis ter sprake is en wat daardie gewone betekenis behels. In hierdie aantekening stel die outeurs regsgeleerdes aan prototipeteorie bekend en lei die onderwerp in met twee metodes waarvolgens prototipes van konkrete kategorieë vasgestel kan word.

#### 1 Introduction

When it comes to the interpretation of statutes, it should be safe to say that the majority of South African jurists know what is meant by “the ordinary meaning of words”. When a contested word is not defined in the relevant statute, it must be given its ordinary meaning (*ipsissima verba*); in other words its plain, everyday and straightforward meaning. What qualifies as “ordinary meaning” is not always clear though, as can be seen from the many South African law scholars and judges who have tried to clarify this phenomenon. Hutton rather short-sightedly argues that linguists have made no contribution in clarifying “ordinary meaning”, which means that jurists cannot turn to linguistics for a better understanding (*Language, meaning and the law* (2009) 86). This is mostly because ordinary meaning is a legal and not a linguistic concept. To claim that a word or phrase might have an ordinary meaning is quite foreign to a linguist and almost on par with believing that a word has a single, straightforward meaning. There is nothing ordinary about meaning. Words are infamously ambiguous and can be very vague at times.

One of the most general ways jurists determine a word's ordinary meaning is by looking it up in a dictionary. Dictionaries are often seen as authoritative when it comes to meaning. If there is one thing jurists should know, it is that ordinary meaning is not equivalent to a dictionary definition. Dictionaries are limited in many ways and should only be seen as a starting point when searching for meaning (Carney and Bergh “'n Taalkundige perspektief op woordeboekgebruik in die hof: die woordeboek as toevlugsoord” 2014 (11) *LitNet Akademies* 44-46). Dictionaries do not contain the broader, pragmatic and contextual meaning of words often relevant to many cases.

A case in point would be the word “hijacking”. In *Cargo Africa CC v Gilbeys Distillers and Vintners (Pty) Ltd* 1998 4 SA 355 (N) Thirion J had to determine, among other things, whether a parked and unattended truck carrying liquor was hijacked or stolen. The defendants plead that the loss did not result from hijacking, mostly because the goods were not in transit

when they were taken. Though the presiding officer made it clear that the contested word's ordinary meaning had to be scrutinised, he referred to it as an "exotic" word (at 365), a word that "has not yet become stereotyped" (at 365). He comes to the conclusion that, even though the majority of dictionaries consulted associated the word with a threat of force and the taking of goods in transit, at least seven of the dictionaries made no references to this (at 356, 364). As a result, the lack of force and its stationary status should be considered as one of the broader meanings of "hijacking", albeit "not the more usual meaning" (at 364). Considering "hijacking" to be exotic by implication excludes it from any "ordinary" meaning. And claiming that the word has not been stereotyped is also not true. Hijacking as a phenomenon has increased dramatically since the 1990's, which has led to the lexical item becoming a very common and topical word in South Africa. We dare say that its stereotypical (and therefore ordinary) meaning contains two criteria, namely "in transit" and "force". By saying this, however, we do not claim that "hijacking" doesn't have any other possible meanings. Yet, the moment you refer to a word's broader meaning, you effectively move away from its ordinary meaning. When Thirion J argues that "hijacking" does not necessarily connote taking of goods in transit or with force, he no longer deals with its ordinary explanation. A word's ordinary meaning is much closer to the stereotype.

The instance of "hijacking" is not an isolated occurrence; the interpretation of words is a common phenomenon in South African law (and that of other countries). Words are often part of litigation, as can be seen in the following examples: *Johannesburg Consolidated Investments Co v LK Investments* 1947 2 SA 465 (W) "boarding house", *Consolidated Diamond Mines of South West Africa Ltd v Administrator, SWA* 1958 4 SA 572 (A) "coast line", *S v Mandela* 1972 3 SA 231 (A) "visitor", *S v Crawford* 1979 2 SA 48 (A) "dealing in", *Association of Amusement and Novelty Machine Operators v Minister of Justice* 1980 2 SA 636 (A) "pin-table", *Jowells Transport v South African Road Transportation Services* 1986 2 SA 252 (SWA) "stock meal", *S v Mafu* 1992 2 SACR 494 (A) "terrorist", *De Reuck v Director of Public Prosecutions, Witwatersrand Local Division* 2003 2 SACR 445 (CC) "pornography", *Minister of Safety and Security v Xaba* 2004 1 SACR 149 (D) "search" and *S v Engelbrecht* 2012 2 SACR 212 (GSJ) "accused". Sometimes the scrutiny of the contested word leads to the examination of other words as well, as can be seen in *Cape Town Municipality v Frerich Holdings (Pty) Ltd* 1981 3 SA 1200 (A) where "motor garage", "service station", "purpose", "manner" and "discontinuation" are considered together with the main word "cessation"; in *S v Collop* 1981 1 SA 150 (A) the words "pregnancy", "embryo" and "vrug" are considered together with the main word "foetus" and in *S v Twin Springs (PTY) Ltd* 1981 1 SA 562 (N) the words "steengroef", "stone", "rock" and "coal" are studied together with the main word "quarry".

This brings us to the purpose of this note: it is not our goal to criticise jurists like Thirion J in how they deal with ordinary words. Rather, we would like to answer Hutton's call and propose at least one possible linguistic approach to determine the ordinary meaning of words. There are a number of ways to determine the ordinary meaning of words, amongst others corpus linguistic and frame semantic approaches – which will not be discussed in this note. For the purpose of this note we would like to introduce legal scholars and practitioners to prototype theory. According to Solan prototype theory (or more precisely, categorisation) is possibly one of the best cognitive means to interpret meaning in judicial matters:

"Because the prototype approach to word meaning more closely approximates our actual knowledge of words, and because it ordinarily permits acknowledgement of gradations of meaning that we all, including judges, experience, I believe that courts should more consciously examine disputed terms in this way." ("Judicial decisions and linguistic analysis: is there a linguist in the court?" 1995 *Washington University LQ*, 1079)

In the following section we will explain what prototypes are and how they relate to the ordinary meaning of at least concrete categories. We will then illustrate how a prototype, (thus ordinary meaning), may be determined.

## 2 Prototypes

Prototypes are often viewed in opposition to the classical approach to categorisation. From the latter perspective, Aristotle saw categories as closed groups where items had to fulfil all the necessary criteria for them to be a member. Membership was binary, which meant that an item either belonged to a category or it didn't. Categories had fixed borders and all items within a category had equal status. If you consider the category "dog" within the classical understanding, it means that all members of this category had to be similar. For a member to qualify as a dog, it needs to have four legs; it must be covered in fur; it must have a tail; it must be able to bark; and it has to move in packs, etc. The moment there is a species that does not have fur, for instance, that species is no longer a dog. Membership criteria are clear and definite and the moment an item doesn't fulfil all of the criteria it can no longer be part of that category.

Conversely, prototype theory holds that categories are fuzzy at the margins and that items do not have equal status. Membership does not depend on fixed criteria. Dogs differ greatly from one another, but their differences do not make them less dog. A prototype is the best exemplar of a category. It is the most typical item within its group. We can tell a lot about the meaning of a word by studying an item's relationship with the prototype (see Löbner *Semantik* (2003) 267; Langacker *Foundations of cognitive grammar* Vol 1 (1987) 59-60).

Rosch did a series of experiments in which she expected participants to arrange a series of items within a natural category according to typicality ("Cognitive representation of semantic categories" 1975 *Journal of Experimental Psychology: General* 104). The category for "Furniture" sees a chair as the best example whereas a telephone is seen as the worst. This experiment revealed that there are grades of membership; when speakers classify items they simultaneously grade (stereotype) them cognitively (Taylor *Linguistic categorisation* (2009) 47). A fridge and a stove might also be examples of furniture, but speakers view a desk, an ottoman and a wardrobe as more representative examples of furniture. Context is a very important aspect of prototypes and a determining factor in categorisation (Rosch "Principles of categorisation" in Margolis and Laurence (eds) *Concepts: core readings* (2000) 202). A penguin might be seen as one of the worst examples for the category "Bird", but once you consider a new category, that is "Arctic Birds", a penguin might be its best example.

When we study the meaning of words, we can identify three taxonomic levels of categorisation, namely the superordinate level, the basic level and the subordinate level. When most people see a picture of an apple, they don't classify the image as "a kind of fruit"; they would rather call the image in the picture an "apple". Some people may go one step further and call this image a "Golden Delicious", though this would be rare. The superordinate level is the broader and vaguer level ("a kind of fruit"), whereas the subordinate level is much more precise ("Golden Delicious"). The basic level is representative of ordinary words; the more typical exemplars of a category (the prototype) are usually found at this level (Mangasser-Wahl *Von der Prototypentheorie zur empirischen Semantik* (2000) 34-35). It is mostly at the basic level that speakers name items and this level is also richer in information than the other two levels (Rosch *et al* "Basic objects in natural categories" 1976 *Cognitive Psychology* 8; Taylor "Prototype theory" (2011) 8 [https://www.academia.edu/1902195/Prototype\\_theory](https://www.academia.edu/1902195/Prototype_theory), accessed 3 September 2014). Moreover, the basic level is representative of the whole category: the word "apple"

simultaneously represents both “a kind of fruit” and “Golden Delicious” (Löbner 274); especially because items at this level have many attributes in common. Furthermore, basic level categories contain words that are used frequently and which are the first words to be acquired by speakers (in context) (Rosch *et al* (1976) 406 ff; Rosch (2000) 198; Löbner 276; Taylor (2011) 8-9; see also Fillmore “Scenes-and-frames semantics” in Zampolli (ed) *Linguistic structures* (1977) 62). In other words, most children will learn the word “apple” first, followed by the words “kinds of fruit” and “Golden Delicious”.

Rosch *et al* found that adults would name items of subordinate level mostly at the basic level despite knowing what the correct terms are at both superordinate and subordinate levels ((1976) 423 ff; (2000) 196). Referring to an ornate table in your reception area as a “table” rather than a “piece of furniture” or a “piano table” would be an example of this. Where the basic level category could be seen as representative of ordinary meaning, the subordinate level is typical of terminology.

Another characteristic of prototypes is their culture sensitivity. The way we use/handle certain objects and the way we understand specific concepts are influenced by the cultures we form part of. This is best illustrated by Fillmore’s discussion of the word “bachelor” (“Towards a descriptive framework for spatial deixis” in Jarvella and Klein (eds) *Speech, place and Action. Studies in deixis and related topics* (1982) 34). If a court had to determine the ordinary meaning of this word and they looked it up in a dictionary, they would be confronted with a definition denoting a man who is not and has never been married. But what happens when we apply this word to the Pope? Do two unmarried gay men in a long-term relationship qualify as bachelors? What about an unmarried man who has been in a coma for the past 8 years? The ordinary meaning of “bachelor” is bound by cultural convention.

Fillmore’s example brings us to another issue surrounding ordinary meaning and prototypes. Though we believe that prototypicality is applicable to many of the so-called ordinary words dealt with by courts (for example *Pannar Research Farms (Pty) Ltd v Magome and Another* 2002 5 SA 621 (LCC) “relocate”, *S v Mavungu* 2009 1 SACR 425 (T) “building” and “caravan”, *Blue Circle Cement Ltd v Commissioner for Inland Revenue* 1984 2 SA 764 (A) “plant” and *Association of Amusement and Novelty Machine Operators v Minister of Justice* 1980 2 SA 636 (A) “pin-table”), not all words are necessarily prototypical. Instead of being the prototype, some ordinary words represent category members that find themselves at some distance from the prototype. Where a Cape sparrow, a pigeon and a weaver are prototypical birds for Gauteng, the ostrich and penguin are not. If we know that a contested word is actually found at the periphery of a category and therefore not typical, we can infer that the word is not as ordinary as it may have seemed at the start.

In the next section we will illustrate two possible ways of determining the prototype.

### **3 How to determine a prototype**

There are a number of ways to work out what the prototype is (of which some are empirical approaches). Seeing that we intended to introduce prototype theory as a means to understand and determine ordinary meaning (of at least concrete objects), we will keep to the simplest methodology here: sentence substitution and Barsalou’s frame in the form of a matrix.

#### *3.1 Sentence substitution*

The meaning of words is in many respects tied to their use in sentences (Rosch “Universals and cultural specifics in human categorisation” in Brislin, Bochner and Lonner (eds) *Cross-cultural perspectives on learning* (1975) 190-191; Rosch (2000) 199). A member term (or basic level term) is often substitutable for the superordinate word in sentences. Consider the

following sentence: “I can see two birds sitting on the garden fence.” The word “birds” is the superordinate word. According to Rosch, we can substitute this term with another member of the category. This means we can use words like “Cape sparrow”, “pigeon” and “weaver” and the sentence will still make perfect sense: “I see two sparrows sitting on the garden fence”. However, the moment we substitute the superordinate term with a category member that stands at quite a distance from the prototype, the sentence becomes semantically absurd (though, grammatically, there is nothing wrong with it): “I see two penguins sitting on the garden fence.” Obviously, a penguin is also a bird, but it has fewer attributes in common with other birds than is the case between a weaver and a sparrow; a penguin is not a prototypical bird and it is very unlikely that it will ever sit on a garden fence in quite the same manner.

We will now turn to three examples taken from court cases where the ordinary meaning of words was considered. The first case is *Waylite Diary CC v First National Bank Ltd* 1995 1 SA 645 (A), in which the court had to decide whether the appointment pages in a field diary were protected by copyright. The court had to decide to what extent these diary pages constituted drawings, a chart or literary work. We will apply our sentence substitution test to “literary work”.

The term “literary work” is the superordinate and the following are some members of its category: novels, plays, poetry, research papers, esoteric articles, newspaper reports and appointment pages (in a field diary). If we construct one sentence with the superordinate, we should be able to substitute the superordinate in subsequent sentences with its basic level members without causing absurdity.

1) André Brink produced a few literary works during his career.

2) André Brink produced a few novels during his career.

The moment we substitute “literary work” with “appointment pages in a field diary” an absurdity enters in:

3) \*André Brink produced a few appointment pages for a field diary during his career.

“Appointment pages” stand at quite a distance from “novels” and “plays” and it should be safe to say that the pages in a field diary are not prototypical of literary work. The definition of “literary work” in the Copyright Act 98 of 1978 is much more technical and inclusive than the term’s ordinary meaning, something that a presiding officer should keep in mind.

The second case is *Jowells Transport v South African Road Transportation Services* 1986 2 SA 252 (SWA), in which the court had to decide whether a transportation permit allowing a person to transport stock meal also allowed the transportation of mealie meal. The applicant argued that the compound noun “stock meal” could include mealie meal, or meal for human consumption. If this were the case, the superordinate “stock” should include “human” as a member of its category, albeit at the periphery. Let us look at the following sentences.

4) I farm with stock instead of crops.

5) I am a stock farmer, not a crops farmer.

6) I farm with chickens instead of crops.

7) I am a chicken farmer, not a crops farmer.

8) \*I farm with humans instead of crops.

9) \*I am a human farmer, not a crops farmer.

In sentence (9) the word “human” becomes ambiguous. From the sentences above we can see that “human” is not one of the prototypes for “stock” and therefore not part of the ordinary meaning of “stock meal”. Stock meal is food meant exclusively for livestock/farm animals/game and does not suffice as a broader term that includes mealie meal.

The third case is *S v Abrahams* 2001 2 SACR 266 (C), in which the court had to decide whether armament could include a petrol bomb according to article 32 of the Arms and Ammunition Act 75 of 1969. The word “armament” refers to military equipment. Can a petrol bomb be seen as military equipment? A petrol bomb is a type of ammunition and

ammunition forms part of armament. Is a petrol bomb necessarily the type of ammunition that national armed forces will store and use? Does the word “armament” apply only to national armed forces? The sentences reveal something about this mystery. “Armament” is the superordinate and is replaceable with its member terms.

10) The soldier had to keep track of the armament used during the practice run.

11) The soldier had to keep track of the ammunition during the practice run.

12) The soldier had to keep track of the hand grenades during the practice run.

13) The soldier had to keep track of the petrol bombs during the practice run.

When we juxtapose the words “soldier” and “petrol bomb” in sentence (13) it admittedly looks strange. However, the moment we add the word “guerrilla” in front of “soldier” the strangeness is altered: “The guerrilla soldier had to keep track of the petrol bombs during the practice run.” The word “petrol bomb” is not the prototype for “military equipment used by national armed forces”, but it can be one of the prototypes for “guerrilla warfare equipment”, especially when one considers phenomena like the Molotov cocktail, its origin and use in recent history.

### 3.2 Barsalou’s frame matrix

Barsalou makes use of frames to identify prototypes (“Frames, concepts, and conceptual fields” in Lehrer and Kittay (eds) *Frames, fields and contrasts. New essays in semantic and lexical organization* (1992) 47; cf Carney *Twis om woorde: ’n Forensiese ondersoek na semantiese kwessies in hofsake* (2015)). His frames consist amongst other things of attribute-value sets. Barsalou defines attributes as concepts that describe an aspect of at least some category member, whereas values are defined as subordinate concepts that indicate type (30-31). For example, the concept “house” consists of a number of attributes such as rooms, roof, floor, storage space, and so on. An attribute such as “room” may take values like “bedroom”, “bathroom”, “dining room” and “sitting room”. Barsalou furthermore describes prototypes simply as “the set of most frequent values across attributes” (47). In other words, the values that are representative of most of the category members will indicate the prototype. However, before you can determine the prototype, you need to consider the relevant category and identify possible category members, a set of attributes that describe those members as well as their respective values. In order to determine the prototype through attribute-value sets we suggest using a matrix similar to Table 1 here below.

First of all, one has to indicate the core category, for instance “common Gauteng bird”. We identify the following possible members: sparrow, myna, weaver, pigeon, owl, duck, falcon, eagle, kori bastard and ostrich. Attribute-values sets describing aspects of birds include size (small, medium and large), colour (white and brown), beak (curved and straight) and movement (walks, flies and swims). Category members are represented by a symbol (we use a letter from the alphabet). The symbol is placed next to the value which is most typical and therefore representative of the category member. The values with the most symbols next to them show typicality and frequency. It is among these values that co-occurrences are visible. They all point towards the prototype. Please study Table 1 (which is illustrative and not truly representative of Gauteng birds).

**Table 1: Prototype for “common Gauteng bird”**

Category	COMMON GAUTENG BIRD		
Attribute	Values	Symbol	Category Member
Size	Small	a b c d	a) sparrow b) Indian myna
	Medium	e f g	
	Large	h i j	

Colour	White	d f	c) weaver d) pigeon e) owl f) duck g) falcon h) eagle i) kori bustard j) ostrich
	Brown	a b c e g h i j	
Beak	Curved	e g h	
	Straight	a b c d f i j	
Movement	Walks	j	
	Flies	a b c d e g h i	
	Swims	f	
Prototype	A prototypical bird in Gauteng is small and brown and has a straight beak. It mostly flies from point A to point B.		

As can be seen in Table 1 there is correlation between “small”, “brown”, “straight” and “fly”. This does not mean that this description of the prototype is true for all birds all of the time. It only shows typicality within the members listed within this category. The moment you make changes to the category, the attributes and corresponding values will also change. For instance, the moment you have a category like “Western Cape pigeons”, your attributes and values will look different to “common Gauteng bird”. All of these pigeons can presumably fly, they will most likely have the same type of beak and they might have similar builds. But other attributes like “call”, “colour” and “feeding habits” could be relevant.

Barsalou argues that it is reasonable to only compute co-occurring information that is relevant to the background knowledge and goals of the perceiver (49). This can be extended to the relevant needs of a court in determining the ordinary meaning of a word. Prototypes and co-occurring relations provide default information about a category, which allows you to make inferences about categories and its exemplars (Barsalou 49). If John told André that he saw a bird sitting on a window sill, André should be able to infer certain information about the bird based on the co-occurring attribute-value sets that he already has in his mind. He can make inferences about the size, colour and movement of the bird. For a bird to sit on a window sill it would most probably be small, it will be able to fly and its colours may range between brown, yellow, red, white and green. It is very unlikely that you will find an emu on you sill.

In order to determine whether Barsalou’s frames (in table format) show any potential to indicate prototypicality and thus also help determine the ordinary meaning of words, we will apply this method to two words taken from South African cases in which the ordinary meaning of the words were under scrutiny.

Let us take “literary work” from *Waylite Diary v First National Bank* to test the matrix. When considering a literary work, the following attributes come to mind: language, content, goal and format (see Table 2). The author of a literary work often uses language in a particular way, either artistically or by following the standardised conventions. Usually, a lot can be said about the language usage of literary texts. Some works can be entirely fictional, whereas others can either be a mixture between fact and fiction or it can be of a more scholarly nature. The purpose of a literary text is amongst others to inform, entertain or to persuade readers of a point of view. Though the format might be of lesser importance it does say something about the nature of literary works. They are mostly published in book format, consisting of many different pages.

**Table 2: Prototype for “literary work”**

Category	LITERARY WORK
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Attribute	Value	Symbol	Category Member
Language	Standard	e g j	a) novel b) poem c) play d) travel writing e) newspaper article f) academic article g) theme based study h) minutes i) advertisement j) diary pages
	Creative	a b c d i	
	Business like	f h	
Content	Fictional	a b c	
	Factual	d e f g h i j	
Goal	Entertain	a b c d	
	Inform	e h g j	
	Persuade	f i	
Format	Book/ compilation	a b c d f g	
	Page	h j	
	Multimedia	e i	
Prototype	A literary work is mostly a creative and/or factual text with the goal to inform as well as entertain. A literary work is usually published in book format.		

There are a variety of written text types and each has its own function and style. When different exemplars, all representing written texts of some kind, are compared to the values associated with a literary work, it becomes apparent that two facing diary pages do not – ordinarily – qualify as a work of literary importance. Two pages in a diary that reflect the names of days and months and which contain dates can hardly be seen as a text with intelligent language usage. If we look at the frequency across values, then the prototype would rather be a text that makes use of creative language and which is mostly factual (literary work is not only creative writing) and has the purpose to either entertain or inform (and sometimes both). In this case diary pages do not fall within the prototype. It is actually quite far from the prototype, which means that it cannot be defined within the ordinary meaning of “literary work”.

In *S v Mavungu* 2009 1 SACR 425 (T) the court of appeal had to determine whether housebreaking could take place in a caravan, seeing that it is not a building *per se*. By “building” they mean dwelling, not large structures like skyscrapers or warehouses. Is housebreaking therefore restricted to structures such as houses or would it include a caravan? In other words, does the ordinary meaning of “building” include a caravan? See Table 3.

**Table 3: Prototype for “building”**

Category	BUILDING		
Attribute	Value	Symbol	Category Member
Size	Small	b c d f g	a) house b) flat c) caravan d) mobile home e) boat house f) tent g) shack h) palace
	Medium	a e	
	Large	h	
Structure	Permanent	a b c d e h	
	Temporary	f g	
Erf	Private	a h	
	Communal	b c d e f g	
Interior	Fixtures	a b c d e h	
	Empty	f g	
Prototype	A building is mostly a small structure made of permanent building material that stands on communal land. It has fixtures		



	like a stove, bath/shower, toilet and built-in cupboard/closets.
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We dare say that a caravan is included in the ordinary meaning of “building”. Buildings (as in “dwellings”) consist of walls, a roof, at least one door and windows. They contain fixtures like cupboards, a bath/shower, toilet and a stove (at least in Gauteng). Though many houses in South Africa are sole title, a great number of dwellings stand on communal land. South African houses are also small to medium in size, though “small” and “medium” are relative terms. Caravans show signs of prototypicality: they are generally small in size, its structure is permanent (in other words, you do not break it down and reassemble it when necessary as is the case with tents and shacks), they often stand on communal land (especially when someone resides inside) and it contains a number of fixtures which sometimes even includes beds. Therefore, there should be no reason why housebreaking could not apply to a caravan in the event that someone trespasses by breaking into the said caravan.

#### 4 Conclusion

It follows from the work of Rosch and substantial subsequent research that categories are often not comprised of clear-cut members and that categories seldom have concise and clear boundaries, which in turn imply that ordinary meaning is hardly ever clear cut and concise (see also Messerschmidt and Bergh “Met kerse op *met*-konstruksies: ‘n verwysingspuntperspektief” 2011 *Southern African Linguistics and Applied Language Studies* 29). As with category members that do not share full and equal degree of membership, ordinary meaning cannot (and should not) be seen as something that is clearly demarcated. Like most category members, ordinary meaning is fuzzy around the edges. It is therefore a misconception that ordinary words are easy to interpret and elementary in nature. On the contrary, there is nothing elementary or straightforward about meaning.

Dictionaries may be legitimate resources when it comes to a word’s ordinary meaning (though words like “stock meal” and its Afrikaans equivalent “*veemeel*” are not recorded in South African dictionaries), but categorisation is much closer to the way speakers process and organise meaning. In this note we illustrated two, simple ways of identifying ordinary meaning by determining the prototype. The goal of our short introduction to and application of prototype theory is to inspire jurists to further explore this and other approaches to the interpretation of meaning, at both word and sentence levels. We are of the view that legal scholars like Hutton would be less critical of linguists if they actually considered the many linguistic possibilities available to them.

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