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# Terrorism as Rhetoric: An Argument of Values

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Howard Metzenbaum (on WKYC-TV, Cleveland): "If he's (Qaddafi) a party to killing innocent Americans, innocent people from all over the world, without any compunction whatsoever, then why need we have such compunction about seeing to it that he personally---"

Mr. Feagler: "---So we assassinate him?"
Senator Metzenbaum: "It would not be the first time."

In this essay I wish to explore why a liberal U.S. senator such as Metzenbaum would make a statement like the one above—and why the American public not only accepts but *expects* such rhetoric. I use "rhetoric" purposefully, for I will argue that by understanding terrorism as rhetoric, Metzenbaum's rhetoric in response can best be explicated.

Before beginning, however, I must include the standard disclaimer necessary for analyzing terrorism. As Walter Laqueur writes, "No definition of terrorism can possibly cover all the varieties of terrorism that have appeared throughout history." Because terrorism has no firm definition, generalizations are difficult if not impossible. In this essay, I will not attempt to generalize for all terrorism. Rather, I wish to locate in the act of terrorism a rhetorical feature which is often present; namely, the epideictic function of rhetoric. I will not, and cannot, argue that the epideictic function is always featured, nor can I argue that it is always or even usually the predominant feature. What I do argue is that this epideictic feature of terrorism can be critical for perceiving the full meaning of the terroristic act; and that failure to consider it may contribute to the difficulties of understanding terrorism. Perhaps of greater importance, rhetoric which arises in response to terrorism often does so with an understanding of terrorism as epideictic.

### Terrorism as Epideictic Rhetoric

Aristotle divided rhetoric into three genres: forensic (judicial), deliberative (political), and epideictic (ceremonial).<sup>3</sup> (1358a-1359b) Typically, scholars treat terrorism as deliberative rhetoric. For example, Michael Stohl in *The Politics of Terrorism* argues that terrorism has four major purposes: to seek publicity (agenda-setting), to coerce bargaining, to force obedience in the population, and/or to provoke authorities into repressive measures. Although he suggests that other purposes exist, these four are the major purposes, and Stohl's list is characteristic of current thought.<sup>4</sup> Other purposes have been suggested, of course: psychological desire for violence, sociological frustration, criminal desire for money, etc; and the literature is replete with examples supporting each of these various "motivations for

terrorism." That terrorism can function as epideictic, however, receives only cursory attention. Yet consideration of terrorism as epideictic is critical to understanding responses to it such as Metzenbaum's.

Epideictic is often written off as simply "ceremonial" rhetoric; recent scholars, however, have recognized epideictic as significant because it acts as reinforcement for existing values. By praising some values and condemning others, epideictic discourse works to "increase the intensity of adherence to values held in common by the audience and the speaker." Thus, an epideictic speech does not simply 'decorate the occasion;' epideictic rhetoric is a confirming rhetoric which certifies the correctness of one's value hierarchy.

To understand terrorism as epideictic, terrorism must be considered as response. Terrorism as response simply recognizes that rhetoric does not occur in a vacuum. Rhetoric is more dialogue than monologue: it arises within and in response to existing discourse and the patterns of that discourse. For example, terrorism can function as epideictic rhetoric because the act or threat of violence directly contravenes the "system," or "establishment." No matter whether the "system" is democratic or not, violence is antithetical to the "order," because violence is disorderly. To use violence argues implicitly that the system is bad and, therefore, that values contrary to the system are good. This feature of violence extends beyond reaction to government, however. Violence is also antithetical to communication; i.e., when humans agree to communicate they imply to the other a respect for their person. To use violence is essentially to dehumanize one's victim, because communication is an essentially human characteristic.7 When terrorists threaten or use violence, they imply an epideictic rhetoric; viz, that their values are correct; the system's, wrong.

The idea of actions arguing values is not new. Bowers and Ochs, for example, divide disputants into two groups: horizontal and vertical deviants. Horizontal deviants are those who agree with their opponents on basic issues; their differences are ones of degree. Vertical deviants are those that disagree fundamentally, and they are the rhetors most likely to move towards obscene actions (e.g., flag desecration) or violence (token or terroristic).

Although terrorism does not always act as epideictic, what is striking about the phenomenon is how often the terrorist argues for the total destruction of the "system." A kind of balancing occurs: the means are extreme, so the ends are extreme also. Nechaev argued for the "prompt destruction of this filthy order." Bakunin thought that the robber was society's "enemy par excellence," for the robber had rejected society out of hand. For the Tupamaros in Uruguay, "their primary objective, they say, is to discredit and destroy the political and economic system." Ulrike Meinhof argued that the Baader-Meinhof group wanted to "hit the system in the face, to mobilize the masses, and to maintain international solidarity." Of these two avowed purposes, the first and last are rhetorically epideictic; only the second functions as deliberative.

Students of terrorism frequently note that terrorists either seek to destroy the "system," or at least justify their violence by claiming to desire such destruction. Pridham notes that terrorism often involves a "fundamental rejection;" of recent left-wing groups Laqueur writes "they were certainly radical in the sense that they opposed 'the system,' the 'establishment,' that they wanted violent change." Implicitly acknowledging violence as epideictic, Lodge writes that terrorists "neither use nor respect accepted channels of communication with the authorities...they contest the legitimacy of the state's authorities."

Terrorism, however, does not simply delegitimize the "system." By denying another's values—through violent actions—the terrorist simultaneously confirms his or her own values. Such confirmation is precisely the function of epideictic rhetoric. Unless terrorism can be seen as epideictic, how does one explain Japanese Red Army hijackers using samuri swords? Or that an Israeli counter-terrorist group called itself the "Wrath of God?" Fanon wrote in *The Wretched of the Earth* that Algerian terrorism against the French would "restore self-respect," and Patrick Pearse justified Irish terrorism arguing that "Blood is a cleansing and sanctifying thing." Suicide terrorists use the 'ultimate sacrifice' to demonstrate their commitment to particular values.

David Rapoport, studying the Indian Thugs, Moslem Assassins and Jewish Sicarii, writes that "the holy terrorist believes that only a transcendent purpose which fulfills the meaning of the universe can justify terror." However, Rapoport argues that modern terrorism can be "ordered rationally," that it is designed for "various domestic and international audiences," i.e., it is *deliberative* rhetoric. Consequently, in Rapoport's view holy terrorism differs significantly from modern terrorism. Although modern terrorism does not generally spring from a religious tradition, I would argue that it frequently has a "religious" quality about it because it can function as epideictic. That is, the terroristic act may not be affirming religious values, as in the tradition of the *fedayeen*, but it is affirming the values of the terrorist, even if these values are largely of a negative, anti-statist variety. The negative act of violence confirms positively one's values and one's commitment to those values.

Rapoport suggests that "the very idea of the holy entails contrast with the profane, the normal, or the natural." Terroristic violence negates the profane order of affairs, normal daily living, our natural means of communication. In the process it confirms its own "holiness." Thus, Laqueur notes that although various groups of anarchists were "confirmed atheists...their belief in their cause had a deeply religious quality." Nor does terroristic violence necessarily oppose a state in order to gain epideictic meaning; the act of violence carries with it a quality of confirmation because of its relationship to communication. For example, Laqueur writes that "the SS too held to a perverse idealism, a belief that only they took values seriously." America is not immune to such epideictic rhetoric. Regarding the bombing of abortion clinics, a Ku Klux Klan editor writes

"God Bless" those courageous young White Christians accused of the bombings. They are doing God's work, while other so-called Christians set back in their pews like cowardly sheep and refuse to even utter a whisper of protest.<sup>22</sup>

Scholars often write that terrorism is ineffective.<sup>23</sup> Yet they make such judgements from a point of view which regards terrorism as deliberative rhetoric; i.e., terrorism as a means towards effecting political change. Such a judgement is certainly a valid one to make, but it ignores terrorism as epideictic. However, terrorism has about it some distinctly non-deliberative qualities. For example, terrorism is generally a futile endeavor, yet it is on the rise.<sup>24</sup> Interestingly, Aristotle pointed out that epideictic rhetoric often praises that which is inexpedient. When holding a value becomes pragmatically costly, keeping that value becomes confirmation of its worth.<sup>25</sup> (1359a)

Successful terrorism also serves as confirmation of terrorism's epideictic potential. Several scholars note that terrorism is most successful when it works to rally an indigenous population against an outsider.26 Partly this success is due to logistical reasons: colonial powers can be convinced to 'cut their losses,' terrorists can work more easily from a supportive native countryside, etc. Partly, however, the epideictic feature of terrorism works well in such an environment; as Horowitz notes, the PLO derives its strength from "its ability to reinforce and undergird organized opposition to Israel...not (from any ability to) inflict a mortal blow on its opponent."27 The ends of epideictic are to 'undergird' and 'reinforce' a system of values: epideictic therefore 'undergirds' and 'reinforces' the group which shares those values. Terrorism does not have to function as an epideictic reinforcement of values, nor is the epideictic feature of 'terroristic discourse' necessarily the only motivation for such rhetoric. Frequently, however, epideictic rhetoric plays an important role in justifying terrorism, even if such justification is not the actual 'motivation' as such.

## The Rhetoric of Response: Reflecting the Terror

Not only does rhetoric act in response, in fact it often mimics or reflects the rhetoric to which it responds. The "yes you are/no I'm not" discourse of children is an exemplar of such reflection. Piaget, studying the language of children, called this "primitive argument," but such rhetoric is not confined to children. Even mature rhetors use reflective rhetoric, for it is a natural mode of argumentation. For example, Edelman writes that bureaucrats use bureaucratic jargon—even when disagreeing—in order to signal that the disagreement is 'in-house.' That is, the jargon demonstrates that the rhetor still holds the values of the group, in this case the bureaucracy. The epideictic rhetoric of terrorism, and the various responses to such rhetoric, can profitably be viewed from the perspective of rhetoric as reflection. The such as the perspective of rhetoric as reflection.

Terrorists themselves often perceive terrorism as reflective. The violence of their communication is a response to the violence of those they

oppose. West German terrorists, for example, considered their acts as the proper response to the "structural violence" of the system. The *Brigatte Rossi* of Italy employed their terror to counter the "terror of the ruling class." In 1972, three Japanese terrorists opened fire in Israel's Lod airport. Working in conjunction with the Popular Front for the Liberation of Palestine, the terrorists timed the raid to coincide with the fifth anniversary of the Six Day War. They named the terrorist team "The Squad of the martyr Patrick Urguello," the hijacking partner of Leila Khaled who, unlike Khaled, had died in the foray. And if this was not "justification" enough for the violence, Israelis found this note:

The raid launched today was a revolutionary answer to the Israeli massacre performed in cold blood by the butcher Moshe Dayan and his devils against the martyr heroes Ali Taha and Abdel Aziz Elatrash...This revolutionary answer was a tribute to the blood of two heroes who fell as a result of a cheap trick.<sup>33</sup>

Note that the violence is viewed as an appropriate response: it is an answer. Note, too, the language so characteristic of epideictic, or discourse of value: tribute, devils, heroes, martyrs. Terrorism is not only an affirmation of values; it is very often "justified" with claims that its violence is an appropriate negation of the violence of others.

Terrorism, then, frequently contains elements of epideictic, specifically an epideictic which condemns fundamentally the state, society, or whomever it opposes. It indicts its opposition, arguing that the terror employed is an appropriate response to the terror of the opposition. Because terrorism contravenes basic values, it is frequently viewed as a fundamental attack. When the Tupamaros killed kidnapped American Dan Mitrone in Uruguay, President Pacheco responded by labelling it "the greatest attack this country's political institutions have faced in this century." Furlong is representative of scholarly opinion when he writes that "political terrorism is implicitly an attack on the authority of the state."

Terrorism within a country is not always considered an attack on that country's values or system, however. Whose rhetoric the terrorism "responds to" is critical; i.e., whose rhetoric and values are being negated through the use of violence. France is an illustrative case. Cerny notes that, during the seventies, most terrorism in France was sporadic, not directed against the French nation. Consequently, the system was not threatened, and most calls by "hard-liners...fall on deaf ears." The "domestic brand of violence," however, by those such as the Breton Liberation Front, "arouses the political passions." 36

The typical response to terrorism is illustrative of its epideictic nature as well as the persuasive use of reflective rhetoric. The epideictic nature of terrorism's attack on one's values justifies an extreme response to that rhetoric, and the violence inherent in terrorism suggests a reflective response of violence. Even a cursory survey of the literature on violence uncovers terrorism frequently countered by more terrorism. Scholars typically label this a "backlash," and the very metaphor of backlash suggests the

reflective nature of such actions.<sup>37</sup> In Argentina the counter-terrorists ended up "mimicking the terrorists."<sup>38</sup> In Uruguay, letters from right wing organizations threatened to kill fifty Tupamaros for every foreigner killed.<sup>39</sup> Israel arrested Rabbi Meir Kahane for smuggling weapons following the Olympic massacre. He denied the allegation of arms smuggling, but he had argued that Israel should adopt the "terrorists' tactics."<sup>40</sup> That the two rhetorical domains can continue this reflection indefinitely is recognized in the phrase "cycle of violence," a phrase commonly employed both by the rhetors involved and the scholars observing from outside.<sup>41</sup> The literature on terrorism is filled with examples of public or state reaction to terrorism: the desire to retaliate, to respond in kind, to 'fight fire with fire.' In fact, one frequent aim of terrorism relies on this impulse: provocation. Guerillas such as Carlos Marighella urge their followers to violence with the argument that "the government has no alternative except to intensify repression."<sup>42</sup>

However, to argue that counter-terrorism has "no alternative" but to respond with violence is a misreading of reflective rhetoric. Rhetors tend to reflect the rhetoric to which they respond. In this case, those whose values are attacked by terrorism's epideictic rhetoric tend to respond with counter-violence. Such need not be the case. To begin, terrorism can be ignored, for it is not a life-threatening situation for most of the society or for the state. As recently as November of 1985 a U.S. military intelligence officer said that terrorism is "another form of warfare. But terrorism is not a major policy problem. It's a policy nuisance." Such a view finds terrorism less of a threat because the perspective is one of terrorism as warfare (i.e., instrumental), not terrorism as epideictic attack on one's values.

Even when terrorism is perceived as epideictic, it can be ignored or minimized. When the Tupamaros killed liaison to Uruguay Dan Mitrone, the Nixon Administration issued only a "White House Statement." The statement argued that "this callous murder emphasizes the essential inhumanity of the terrorists"—thus interpreting the murder as an epideictic affirming a value of inhumanity—but issued no calls for retaliation. When the Lod airport massacre resulted in 25 killed and 72 wounded, including some Americans, Nixon released no statement, made no speeches, had no comments.

Ignoring terrorism as rhetoric is not the only alternative, however. Rhetors may, for example, choose to use the rhetoric of democracy or legality in response. Sometimes this may be used simply as a means of affirming one's own values; it says, essentially, that in contrast to terrorism's inhumanity, I shall remain civilized. That is, because such rhetoric so starkly highlights the values presented in terrorism, it similarly presents its own values in sharp relief. Such rhetoric typically talks of the 'civilized response,' the 'need to redouble diplomatic efforts,' and of 'combatting the problem within the existing legal framework.'

Rhetors may also employ democratic rhetoric in an effort to reformulate the geography of the discourse. They recast the discussion into democratic language hoping that the opposition will reflect that formula.<sup>46</sup>

The recent British-Irish pact on Northern Ireland is just such an attempt. The reaction to the pact, however, is not atypical. Reverend Ian Paisley called Thatcher a "quisling," and the Secretary of State for Northern Ireland was attacked by about fifty people shouting "traitor." Such views are understandable, for the British have symbolically negated the values affirmed through violence by abandoning violence as a rhetorical tool. Of course, the situation is more complex than just epideictic symbolics: power, property, and lives are at stake, as well as mutual antipathy that makes any negotiation distasteful to some members of both sides. However, the symbolic importance of the British attempting to abandon violence (in the form of the Home Guard) in favor of the democratic language of diplomacy and negotiation ought not be underestimated.

Sometimes such non-reflective rhetoric does work. For example, Clutterback suggests the Geoffrey Jackson kidnapping as an illustrative case. Jackson, the British amabassador to Uruguay, was kidnapped and held by the Tupamaros for eight months. Communication between Jackson and his captors was at first tense, but Jackson's consistent use of gentle humor eventually broke through to his captors, and moved their relations to a more "human" level. 48 Such are the possibilities of using non-reflective rhetoric to fight fire not with more fire, but with water instead.

#### Conclusions

Terrorism has an epideictic feature inherent in its use of violence. Because violence is fundamentally antithetical to both the "system" and to human communication, it directs attention to the values which give rise to such violence. It also suggests implicitly that those values, like the violence, are antithetical to the values against whom the violence is directed. Marighella argued that urban guerilla violence in Brazil should be directed towards "the killing of a North American spy, of an agent of the dictatorship, of a police torturer, of a fascist personality in the government,... of a stool pigeon, informer, police agent, or police provocateur." The list suggests the values which Marighella would profess to hold, and those values he would disdain. Conversely, the Palestinian Zayed justified indiscriminate violence because there are no innocents, all are guilty if only because "they had not 'raised a finger for the Palestinians.' "50 That list of victims clearly asserts his values.

Terrorism need not always be epideictic, nor is epideictic always the predominant feature of the discourse. Terrorists certainly have varied motivations, and they can mix those motivations in varying quantities. Genres of rhetoric, however, can also be mixed, and in varying degrees. Rhetoric can include forensic, epideictic and deliberative elements, or any two of the three. Further, a particular rhetor may decide to feature one genre over the other.<sup>51</sup>

However, terroristic violence *implies* an epideictic facet even if the terrorist does not mean it too. Thus, even if the violence is meant simply as a means to an end, e.g., to overthrow the government, the responding rhetor can plausibly read into the violence a rhetoric threatening the value system.

Further, because the threat is couched in symbol—the method of rhetoric—the lack of *physical* threat can be treated as immaterial. This symbolic challenge to the system makes coherent Reagan's justification for sanctions on Libya: because of "an unusual and extraordinary threat to the national security and foreign policy of the U.S." Such a rhetorical response may not be accurate, but it is coherent given the epideictic challenge to our system.

Rhetors tend to reflect the rhetoric they oppose. Such is not necessarily the case, however. Whereas Nixon ignored the Lod airport massacre, Reagan has responded in a rather reflective manner. If the economic sanctions fail to stop Libya's assistance, "I promise you that further steps will be taken." "Further steps," suggest that the economic violence of sanctions are likely to be followed by a less metaphorical, more literal violence.

Rhetoric is a dialogue. Rhetoric that "attacks," as terroristic violence does so both literally and symbolically, invites the rhetorical victim to respond. Because rhetors tend to reflect such an attack, the resulting impulse is to "counter-attack." Thus, a Senator Metzenbaum can justify violence against Qaddafi for two reasons: the violence of Rome and Vienna "demands" an answer, and Qaddafi's violence invites, indeed justifies, a violent answer. The ease with which rhetors employ such rhetorical dialogue is evident in George Shultz's challenge to the European states which chose to avoid the response of sanction:

If you don't like what we're doing, what do you suggest be done? Personally, I don't think the answer can be nothing.<sup>54</sup>

#### **ENDNOTES**

As reported in the New York Times, January 10, 1986, 7:1.
Walter Laqueur, Terrorism (Boston: Little, Brown and Co., 1977), p. 7.
Aristotle, The Rhetoric and Poetics of Aristotle, trans. W. Rhys Roberts (New York:

The Modern Library, 1954), pp. 31-34.

\*Michael Stohl, The Politics of Terrorism, 2nd ed. (New York: Marcel Dekker, 1983), pp. 3-5. For other examples, see Martha Crenshaw, Terrorism, Legitimacy, and Power (Middletown, Conn.: Wesleyan University Press, 1983), pp. 7-10; Laqueur, p. 109; and Richard Clutterback, Living with Terrorism (New Rochelle, N.Y.: Arlington House Publishers, 1975),

See J. Bowyer Bell, Transnational Terrorism (Washington, D.C.: American Enterprise Institute, 1975), pp. 16, 18; and Alex P. Schmid and Janny de Graaf, Violence as Communica-

tion (Beverly Hills: Sage, 1982).

Chaim Perelman and L. Olbrechts-Tyteca, The New Rhetoric, trans. John Wilkinson

and Purcell Weaver (Notre Dame: Notre Dame University Press, 1969), p. 52.

'See, for example, Dwight Van De Vate, Jr., "The Appeal to Force," and George Yoos, "A Critique of Van De Vate's 'The Appeal to Force," Philosophy and Rhetoric 8 (1975), 43-60 and 172-176. Although the two authors have significant differences, both concur on the argu-

ment presented above.

\*John Waite Bowers and Donovan J. Ochs, The Rhetoric of Agitation and Control (Reading, Mass.: Addison-Wesley, 1971), pp. 7-37. See also Herbert W. Simons, "Persuasion in Social Conflicts: A Critique of Prevailing Conceptions and a Framework for Future Research," Communication Monographs 39 (1972), 227-247; Robert L. Scott and Donald K. Smith, "The Rhetoric of Confrontation," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and Richard J. Goodman and William I. Gorden, "The Rhetoric of Desecration," Quarterly Journal of Speech 55 (1969), 1-8; and 1-8; nal of Speech 57 (1971), 23-31. The latter specifically discusses desecration of the flag as an act which "negates the social order."

'S. Nechaev, The Revolutionary Catechism, in D.C. Rapoport, Assassins and Terrorists

(Toronto: Canadian Broadcasting Corp, 1972), p. 71.

10 Laqueur, p. 28.

11 New York Times, 11 August 1970, p. 1:2.

<sup>12</sup>This is a paraphrase of court testimony, as reported in *The (London) Times*, 15

December 1972.

<sup>13</sup>Geoffrey Pridham, "Terrorism and the State of West Germany during the 1970s," in Juliet Lodge, ed., Terrorism: A Challenge to the State (N.Y.: St. Martin's Press, 1981), p. 22; and Laqueur, p. 176.

14Lodge, p. 226.
15New York Times, 31 March 1970, p. 1:3.

16Quoted in Laqueur, p. 206.

David C. Rapoport, "Fear and Trembling: Terrorism in Three Religious Traditions," American Political Science Review 78 (1984), 658-677.

18Ibid, pp. 659, 674.

19Ibid, p. 674. 20 Laqueur, p. 127.

<sup>21</sup>Laqueur, p. 75. Emphasis mine.

<sup>22</sup>The Confederate Leader, February 1985, p. 5. Emphasis mine. <sup>23</sup>See, for example, Laqueur, pp. 117-118, 221; Crenshaw, pp. 26-27, Irving L. Horowitz "The Routinization of Terrorism and Its Unanticipated Consequences," in Crenshaw, p. 42; Clutterback, pp. 124, 131; and Paul Furlong, "Political Terrorism in Italy," in Lodge, p. 58.

<sup>24</sup>Horowitz, p. 39. 25 Aristotle, p. 33.

<sup>26</sup>Laqueur, pp. 118, 223; Horowitz, pp. 45-46; and Clutterback, p. 124.

27 Horowitz, ibid.

<sup>28</sup> Jean Piaget, The Language and Thought of the Child, trans. Marjorie and Ruth Gabain,

3rd ed. (London: Routledge and K. Paul, 1959), p. 66.

<sup>29</sup>Murray Edelman, *Politics as Symbolic Action* (Chicago: Markham Press, 1971), p. 74. <sup>30</sup>For further discussion of rhetoric as reflective, see Richard W. Leeman, "Reflective Rhetoric: Its Framework and Utility in Explicating the Rhetoric of Prohibition and Repeal" (M.A. Thesis: University of Maryland, 1982).

<sup>31</sup>Pridham, p. 22. <sup>32</sup>Furlong, p. 70-71.

33 New York Times, 31 May 1972, p. 27:2. Emphasis mine.

34 New York Times, 11 August 1970, p. 1:2.

35Furlong, p. 61. Of course, this is applicable only to anti-state terror.

<sup>36</sup>Philip G. Cerny, "France: Non-Terrorism and the Politics of Repressive Tolerance," in Lodge, p. 107.

See, for example, Clutterback, p. 17; Crenshaw, pp. 10, 15, 16; Laqueur, p. 224; Lodge, p. 225, and Cerny, p. 92.

38Crenshaw, p. 140.

<sup>39</sup>New York Times, 10 August 1970, p. 1:2. Eventually right-wing militarists ousted the

democratic government, using the terror of the Tupamaros as justification.

40 New York Times, 2 October 1972, 10:4.

"For example of the former, see New York Times, 15 November 1985, 1:1 (concerning the recent British-Irish Pact) and 29 December 1985, p. 1:4 (following the Rome/Vienna airport massacres). For examples of the latter see Cerny, p. 111; and Crenshaw, p. 18.

<sup>42</sup>Carlos Marighella, Minimanual of the Urban Guerilla, reprinted in Robert Moss, Urban

Guerrilla Warfare (London: International Institute for Strategic Studies, 1971), p. 40.

43See, for example, Bell, p. 88. Many scholars note the limited physical effect of terrorism's damage. See for example Horowitz, p. 45.

"New York Times, 26 November 1985, p. A10:1.

45 Weekly Compilation of Presidential Documents, 10 August 1970.

46 See, for example, Murray Edelman, The Symbolic Uses of Politics (Urbana: Univ. of Illinois Press: 1964), pp. 130-151.

47 New York Times, 16 November 1985, p. 8:1 and 21 November 1985, p. 3:4.

48Clutterback, p. 135-136.

49Marighella, p. 34. 50New York Times, 4 June 1972, p. 10:1.

"Kathleen Hall Jamieson and Karlyn Kohrs Campbell, "Rhetorical Hybrids: Fusions of Generic Elements," *Quarterly Journal of Speech* 68 (1982), 146-157. I would also note that "genre" need not be restricted to the three divisions listed above.

52 Executive Order 12543, 7 January 1986. 53 New York Times, 8 January 1986, p. 1:6. <sup>54</sup>New York Times, 16 January 1986, p. 8:1.