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How We Talk About the Press

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HOW WE TALK ABOUT THE PRESS

Erin C. Carroll*

INTRODUCTION

“I believe freedom begins with naming things.” Eve Ensler

When the American Dialect Society made “fake news” its 2017 “Word of the Year,” the press release described two related reasons for the organization’s decision. The first was the term’s ubiquity. The second was its slipperiness. Beyond referring to propaganda, the meaning of fake news had become a weapon—a “rhetorical bludgeon” against the press.

Since receiving this distinction, the term fake news has continued to enjoy popularity. Scholars, teachers, and journalists still use it. For example, a Harvard website offers students “Four Tips For Spotting a Fake News Story.” According to The Guardian newspaper, the “Word of the Year” honor (also bestowed on fake news by the U.K.-based Collins Dictionary and Australian-based Macquarie Dictionary) gave fake news a “certain legitimacy.”

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3 Id.
The continued and often-uncritical use of fake news should worry us. As thinkers across disciplines have recognized for centuries, how we name things matters. It shapes the very way we understand them. And this is especially true when it comes to the press.

Although conventional wisdom is that press power and freedom spring primarily from the First Amendment, in reality, the doctrine is that the press has no greater rights than any other speaker. Press power and freedom are derived in large part from customs and norms. And those customs and norms draw sustenance from the positive language of the courts, other institutions, and the public about how the press serves the democratic functions of truthful educator, trusted proxy, and fair watchdog.

Press power is, in great part, rhetorical power. This rhetorical power is especially fragile in our networked information sphere. As we are coming to understand, when labels or narratives are decontextualized and amplified, we begin to internalize and adopt them, sometimes regardless of their accuracy or how savvy we believe ourselves to be. Moreover, what is blunt and vitriolic generally scales further and faster than what is nuanced or measured. As a label, fake news is arguably becoming so entrenched and normalized that it might ease the way for other terms that rhetorically marry the press to falsity, bias, and laziness—like “pink slime journalism”—to slip into our everyday discourse.

If protecting the press was the only goal of curbing anti-press rhetoric that would be enough. But there is another reason to do it. How we talk about the press plays into how we tackle one the biggest challenges of our networked age—stemming information pollution. Fundamental to this effort is separating accurate information from false, trusted sources from manipulated ones, and journalism from propaganda and marketing. If we use labels that conflate these categories, we make a daunting task harder.

As we barrel toward one of the American press’s biggest challenges of this century—reporting on the 2020 presidential election—we need to provide the press every possible support. Taking care in how we talk about the press should be part of that effort.

I. THE POWER OF NAMING

Belief that the act of naming brings with it great power is one that stretches across time, religion, culture, and academic discipline. We could start with the Book of Genesis and God’s

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7 See infra Part I.
8 See infra Part III.
11 See infra Part II.
command “Let there be light” resulting in the existence of illumination.\textsuperscript{13} We could look at the fairy tale Rumpelstiltskin, in which an impish man lords over a miller’s daughter until she is able to learn the man’s name.\textsuperscript{14} We could look to the Russian-French mathematician Alexander Grothendieck who, it was said, “had a flair for choosing striking evocative names for new concepts; indeed he saw the act of naming mathematical objects as an integral part of their discovery.”\textsuperscript{15} Evidence is rich that great power inures in the act of naming.

But naming goes beyond giving us the power to control. Names tend to shape how we understand things. As the Heisenberg principle posits that the very act of looking at something changes it, this phenomenon extends to linguistics as well, according to marketing scholar Adam Alter.\textsuperscript{16} “[A]s soon as you label a concept, you change how people perceive it,” Alter says.\textsuperscript{17}

This change in perception can be in service of humanity and freedom. For example, blogger and cultural critic Maria Popova has written that to name something is “to confer upon it the dignity of autonomy while at the same time affirming its belonging with the rest of the namable world; to transform its strangeness into familiarity, which is the root of empathy.”\textsuperscript{18} It can also be in service of beneficial progress. For example, naming is a precursor to our ability to problem-solve. As feminist writer and historian Rebecca Solnit has written, “When the subject is grim, I think of the act of naming as diagnosis. Though not all diagnosed diseases are curable, once you know what you’re facing, you’re far better equipped to know what you can do about it.”\textsuperscript{19}

But as naming can be generative, it can likewise be oppressive. Names can be used to minimize, defame, and distance or other. Law gives us a host of shameful and current examples of this phenomenon. An entire section of the United States Code is titled “Aliens and Nationality.”\textsuperscript{20} And our gun laws refer to “mental defectives.”\textsuperscript{21}

As evidenced by these examples, damaging naming practices can have cultural staying power. Rhetoric and law scholar Lucy Jewell has written that “harmful rhetoric used to describe racial minorities and other subordinated groups produces toxic thought patterns that can become entrenched in the public mind.”\textsuperscript{22}

\textsuperscript{13} Id. at 229.
\textsuperscript{14} Id. at 231.
\textsuperscript{15} Id. (citing A. Jackson, \textit{Comme Appelé du Néant}, \textit{NOTICES OF THE AM. MATHEMATICAL SOC’Y} 29.5, 173-78 (1974)).
\textsuperscript{17} Id.
\textsuperscript{20} 8 U.S.C. 1101 et seq.
\textsuperscript{21} See 18 U.S.C. § 922. This statute, in discussing who is barred from gun ownership, also happens to refer to an “alien” who is “illegally or unlawfully in the United States.” Id.
Thus, to name or to misname something has tremendous significance. It shapes how we understand what is named, how we value it, and how we consider its possibilities. This is all true when it comes to the names we use to refer to the press.

II. CALLING THE PRESS NAMES

The story of “fake news” became popular is a story of metastasizing meaning. According to Merriam-Webster, the term’s original meaning was a literal one. First used in the late nineteenth century, fake news was the sum of its parts. It meant false (i.e. fake) information published by the press (i.e. news).

Skip ahead more than a century, and the term reemerged in the 1990s. Perhaps tracking the popularity of the spoof magazine the Onion, fake news was used to mean news satire. Then, as information migrated online, the meaning of fake news again shifted. In 2014, Craig Silverman, a journalist documenting misinformation, discovered a false story describing a Texas town that had been quarantined because a family in it contracted Ebola. The story included a made-up quote attributed to a hospital official in a seeming attempt to make it look like a news article. Silverman fired off a tweet linking to the false story and saying, “Fake news site National Report set off a measure of panic by publishing fake story about Ebola outbreak . . . Scumbags.” This use of fake news had a new meaning—false information, lies, or propaganda, dressed up to appear as news and deployed online.

The path of fake news then developed another well-known fork. About a week before his inauguration as president, Donald J. Trump responded to a question from CNN’s Jim Acosta saying: “You’re fake news.” At about the same time, the President adopted fake news as a Twitter mantra. At most recent count, the President had tweeted the terms “fake news,”

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24 Id.
26 Id.
28 Id.
29 Id.
30 See id. In advance of the 2016 presidential election, “fake news” continued to be used to describe disinformation churned out by sites “hoax sites and hyperpartisan blogs.” See Craig Silverman, This Analysis Shows How Viral Fake Election News Outperformed Real News on Facebook, BUZZFEED NEWS (Nov. 16, 2016), https://www.buzzfeednews.com/article/craigsilverman/viral-fake-election-news-outperformed-real-news-on-facebook. These sites produced false stories with titles like, “Pope Francis Shocks the World, Endorses Donald Trump for President” and “WikiLeaks CONFIRMS Hillary Sold Weapons to ISIS.” Id.
31 Wendling, supra note 9.
32 See id.
“fakenews,” or “fake media” nearly seven hundred times. And he has inspired copycats among other government officials both in the United States and abroad who also brandish the term as a sword. In 2017, use of the term fake news rose 365 percent.

Beyond these uses of fake news (as satire, disinformation, and weapon), more permutations exist. One study examining academic articles using the phrase fake news teased out six different meanings. Fake news is a jellyfish of a term—squishy and stinging.

That sting is obvious when fake news is wielded as a weapon. And although it is certainly necessary to call those who are weaponizing fake news, this has been done. Here, instead, my concern is with those who likely do not intend to harm—who may even be avid supporters of the press. Unintentional harm is still harm. As communications scholar Whitney Phillips has pointed out, “The impact of industrial-scale polluters online—the bigots, abusers, and chaos agents, along with the social platforms that enable them—should not be minimized. But less obvious suspects can do just as much damage.”

These less obvious suspects perpetrate harm in a variety of ways. One is suggesting fake news is actually a type or a subset of news. For example, the Wikipedia page for “fake news,” begins by saying fake news is “a form of news.” Likewise, in a post on its website, Merriam-Webster indicates it is not planning to add fake news to its dictionary because fake news is “a self-explanatory compound noun” with “an easily understood meaning.” According to Merriam-Webster, “Fake news is, quite simply, news (‘material reported in a newspaper or news periodical or on a newscast’) that is fake (‘false, counterfeit’).”

35 See Flood, supra note 6.
38 Phillips, supra note 9.
40 The Real Story of “Fake News,” supra note 23 (emphasis in original).
41 Id.
But defined this way, fake news is an oxymoron—and a damaging one. As a United Nations report on disinformation explained, “news’ means verifiable information in the public interest, and information that does not meet these standards does not deserve the label of news.”\(^4\) That is, news is necessarily not fake. It may contain inaccuracies. It may lack context. But journalists are not intending to deceive. By suggesting journalists are taking us for a ride or the press is churning out false facts, this use of fake news, linguistically links the press and falsity.\(^4^4\)

Likewise, although scholars and journalists have become more attuned to the underbelly of using the term fake news (Buzzfeed’s Silverman now cringes every time he hears it\(^4^5\)), some still invoke it in ways that, however well-intentioned, feel superfluous and designed to grab attention. For example, the title of a paper by Dartmouth researchers asks: “Real Solutions for Fake News?” Yet, the paper then goes on to say that because the term fake news is “frequently used in imprecise and confusing ways” the body of the paper will use other terminology.\(^4^6\)

Putting aside the clearly good intentions of the authors, as a reader, it is hard not to feel the title is a bit clickbait-y. Likewise, a recent article in The Atlantic is headlined The Conservatives Trying to Ditch Fake News, but the article is about an effort to create journalism for a conservative audience.\(^4^7\) The body of the article did not use the term fake news at all.\(^4^8\)

The continued popularity of fake news is not surprising. As a phrase, its two-syllable-simplicity combined with its fuzzy meaning plays to the reflexivity and shallow thinking our frenetic online spaces encourage. Fake news can be slapped on all sorts of content, and it disparages on contact. This may be its appeal, but it is also its danger.

And the longer it enjoys popularity, the more entrenched it becomes. There may be no greater testament to this than its inclusion in a 2020 Super Bowl advertisement.\(^4^9\) The ad for Amazon’s Alexa included an exchange in which a man asked a newsboy “What’s today’s


\(^{43}\) Id. This report does have the words “Fake News” in its title, but those words are crossed out with a red slash on the cover page. *Id.* at 1.


\(^{45}\) Silverman, *supra* note 27.


\(^{48}\) Another example is a recent article in Harvard’s Nieman Lab that used “fake news” in the subheading but not all in the article. See Mike Caufield, *Crtl-F: Helping Make Networks More Resilient Against Misinformation Can Be as Simple as Two Fingers*, NIEMAN LAB (Jan. 29, 2020), https://www.niemanlab.org/2020/01/ctrl-f-helping-make-networks-more-resilient-against-misinformation-can-be-as-simple-as-two-fingers/. The subheading on the article stated: “Sometimes it’s the sort of basic Internet skill you might take for granted—like knowing how to search a web page—that can stop someone from sharing fake news.” *Id.*

\(^{49}\) See *Amazon Super Bowl Commercial 2020*, YOUTUBE (Jan. 29, 2020) https://www.youtube.com/watch?v=RF9t2rFmTVE.
news?” and the newsboy responded, “Doesn’t matter. It’s all fake.”

Ironically, Amazon’s owner, Jeff Bezos, also owns The Washington Post. The ad’s use of fake news as a punch line—especially by a company whose owner should be a champion of the free press—is more concerning than funny. As described, naming practices shape how we think about people, ideas, and institutions. Moreover, as those studying disinformation have confirmed, when people are exposed to false information again and again, that information begins to feel true—so true that it is believed even when people are shown evidence of its falsity. Thus, even corrective efforts to demonstrate news is the product of journalism—a method aimed at unearthing, contextualizing, and communicating truth—may be unsuccessful.

We should also be concerned that fake news may not be the last of its ilk. It is possible this type of term—one linking journalism to falsity—will proliferate. “Pink slime journalism,” could be next. In December 2019, the Tow Center for Digital Journalism at Columbia University published a report entitled “Hundreds of ‘Pink Slime’ Local News Outlets Are Distributing Algorithmic Stories and Conservative Talking Points.” The report did more than the headline to separate “pink slime” from “news” in describing the mushrooming of 450 “partisan outlets masquerading as local news organizations.” But it is still possible to see how the phrase could become the same type of weaponized, lobby, value-laden, smear as “fake news.”

III. Why What We Call the Press Matters

Naming is of vital importance when it comes to the press. A great deal of press power springs not from law but from language. Press power is, to a large extent, rhetorical power. Using—even without ill intent—terms that have the potential to undermine the press is a risk.

For those who believe in a free press, there is solace in thinking the Constitution will protect the press. Journalists, for one, regularly invoke the First Amendment as a guardian. But

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50 Id. It is hard to tell if the reference is made ironically, especially given that the newsboy shakes his head when the questioner can’t stop laughing at the fake news reference. See id. But the lack of clarity is part of the danger inherent in the term. And, in fact, the director of communications for Reporters Committee for Freedom of the Press tweeted her disappointment about the ad. Jenn Topper (@jenntopper), TWITTER (Feb. 2, 2020, 9:05 PM), https://twitter.com/jenntopper/status/1224151948812791809.

51 Phillips, supra note 9.


53 The report provides a link on the term “pink slime journalism” to a blog post about an episode of the radio show This American Life on a company named Journatic that created “hyper-local journalism” using automation as well as employees based in the Philippines writing under false bylines. Id. (linking to Dan Kennedy, Exposing the “‘pink slime journalism’” of Journatic, MEDIA NATION (July 5, 2012), https://dankennedy.net/2012/07/05/exposing-pink-slime-journalism/). As noted in the blog post, the same Journatic employee interviewed by This American Life separately told the journalism nonprofit Poynter, “I feel like companies like Journatic are providing the public ‘pink slime’ journalism.” See Kennedy, supra note 53; Anna Tarkov, Journatic Worker Takes “This American Life” Inside Outsourced Journalism, Poynter (June 30, 2012), https://www.poynter.org/reporting-editing/2012/journatic-staffer-takes-this-american-life-inside-outsourced-journalism/.

although the press is named in the First Amendment, the power of the First Amendment to protect the press is constrained. The First Amendment protects the press from Congress making a law infringing on press freedom, but it does not grant the press affirmative rights. The Supreme Court justices have stated that the press has no special protections over and above those of any speaker. And the First Amendment only protects the press from government overreach.

Beyond the First Amendment, press power rests on what press law scholars RonNell Andersen Jones and Sonja R. West have called other “pillars.” These include, among others, the press’s financial strength; the public’s trust of the press; and customs and norms.

These pillars are interdependent, and, in this moment, they are compromised. The press’s advertising-based business model is failing as technology platforms vacuum up advertising dollars. Many press players are still struggling to profit. The public’s trust is not at an all time low, but it is close, with only forty-one percent of Americans saying they trust the media. Perhaps most alarmingly — because of its swiftness and speed — norms are customs are collapsing. The White House has discontinued press briefings. As of this writing, it has not held a formal press briefing since March 2019. The administration has pulled press passes and otherwise denied journalists access to officials in seeming retaliation for negative coverage.

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Amendment has served as the world’s gold standard for free speech and the free press for two centuries.

55 See U.S. CONST. amend. I.
56 See id. (“Congress shall make no law … abridging the freedom of speech, or of the press”).
57 See Citizens United v. Federal Election Commission, 558 U.S. 310, 390 n. 6. (2010) (Scalia, J., concurring) (dismissing as “passing strange” the belief that the press should receive special constitutional protection); Branzburg v. Hayes, 408 U.S. 665, 704 (1972) (“Freedom of the press is a ‘fundamental personal right’ which ‘is not confined to newspapers and periodicals.’”)
58 See U.S. CONST. amend. I.; Turner Broad Sys. v. FCC, 512 U.S. 622, 685 (1994) (O'Connor, J., concurring) (noting that “the First Amendment as we understand it today rests on the premise that it is government power, rather than private power, that is the main threat to free expression”).
60 See id.
65 See Aaron Rupar, State Department Bans NPR Reporter from Traveling with Pompeo After Testy Interview, VOX (Jan. 28, 2020), https://www.vox.com/2020/1/28/21111760/pompeo-state-department-
And the executive branch is not alone in demonstrating disdain for the press. During the recent Senate impeachment trial, Capitol Police gave senators cards cueing them with language to use if they sought to avoid talking to journalists including, “Please get out of my way” and “You are preventing me from doing my job.”

The term fake news and other anti-press rhetoric contributes to the pillars’ collapse. Repetition of it is like unleashing groundhogs to burrow under the pillars of press freedom. The groundhogs may not singlehandedly bring them down, but they riddle the ground with holes, destabilizing it.

The effect may be greatest on the trust pillar. As researchers at the University of Texas concluded, “exposure to talk about fake news may lower individuals’ trust in media and lead them to identify real news with less accuracy.” Researchers primed subjects by showing them tweets referencing “fake news” before reading articles. Even tweets that merely included the phrase fake news in the headline of a story tended to lessen trust.

Beyond trust, anti-press rhetoric has also been blamed for creating an environment so rife with hate that it subjects journalists to harassment, threats, and even death. The Committee to Protect Journalists has blamed President Trump’s tweets for giving “cover to autocratic regimes” and says it is aware of several U.S. journalists “who say they were harassed or threatened online after being singled out on Twitter by Trump.” And after the murder of five journalists while they worked in the Annapolis, Maryland Capital Gazette newsroom, numerous journalists

68 Funke, supra note 67; Duyn & Collier, supra note 67 at 35, 42. Notably—and perhaps seemingly at odds with the Duyn and Collier study, a 2019 study found that President Donald J. Trump’s tweets about fake news may actually cause readers to believe the press is more credible. See Daniel J. Tamul et al., All the President’s Tweets: Effects of Exposure to Trump’s “Fake News” Accusations on Perceptions of Journalists, News Stories, and Issue Evaluation, MASS COMM’N & SOC’Y (Aug. 7, 2019), https://www.tandfonline.com/doi/abs/10.1080/15205436.2019.1652760?casa_token=dBs_vh-bLSAAAAAA%-3AaIClgz3fl6akMdwV_Jx1EjO7qROt7v_dZAo0XdxLbWX_N4JQM6bJOmUWHU_BU GUDCnbjZzch133CKoQ&journalCode=hmcs20. Yet, a synopsis of the study by Harvard’s Shorenstein Center indicated that the findings “cannot be generalized beyond the individuals who participated” in the studies—about 2,000 people, more than half of whom were undergraduate students. Denise-Marie Ordway, Fake news and fact-checking: 7 Studies You Should Know About, SHORENSTEIN CENTER ON MEDIA, POLITICS, AND PUBLIC POLICY (Jan. 13, 2020), https://journalistsresource.org/studies/society/news-media/fake-news-fact-checking-research-2019/.
69 Sugars, supra note 33.
blamed pervasive anti-press rhetoric. This rhetoric includes “fake news” but goes beyond it to include epithets like “enemy of the people.”

Because of their interdependence, the tumbling of one pillar could precipitate the tumbling of them all. Undermining the public’s trust in the press can hurt the press’s bottom line and, consequently, justify the erosion of norms and customs. As the New York Times editorial board wrote in an editorial about the term fake news: “The capacity of news organizations to produce [hard-hitting] journalism—and to reach an audience that will listen—is contingent and fragile.” Using the term fake news is one more contribution to the undermining of the press.

IV. Divorcing Fake From News

It is probably impractical and maybe even unhelpful to argue that the phrase fake news should never be used. For example, using the term with context about its imprecision or to critique its meaning, seems legitimate and even beneficial. Yet, some self-imposed censorship is in order. Before we mentally reach for fake news (or pink-slime journalism or any other term that uses a broad brush to paint the press unfairly) we should engage in some strategic silence. In a journalistic context, strategic silence calls for consideration of the public good in deciding whether or not to share information, especially online. In other words, we need to pause, mentally generate some of the friction largely absent in our online spaces, and consider whether a more precise term could substitute.

The lexicon is fast developing. Notably, Claire Wardle at First Draft, a nonprofit dedicated to combatting what Wardle calls “information disorder,” has developed an “Essential Glossary” for the task. It includes terms like disinformation, misinformation, and malinformation. Does not include fake news, which Wardle, along with blogger and researcher Hossein Derakhshan, have described as “woefully inadequate to describe the phenomena of information pollution.”

The substitutions may not be as catchy, but they are also not as poisonous. For example, in a recent Twitter thread, Renee DiResta, the technical research manager at Stanford Internet

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72 The N.Y. Times Editorial Board, supra note 34.


75 Id.

Observatory, referred to “‘pink slime’ content farms that look like journalism.” That description is eight words to “pink slime journalism’s” three, but it also helps make the nuanced point that this content is not news or journalism even if it is intended to look like it is.

Shunning anti-press-rhetoric, especially fake news, is also a component of a broader effort to remedy information pollution. Along with “real-world” pollution and climate change, this problem is rapidly evolving into one of the greatest we societally face—impacting our mental and physical health, our elections, and our democracy. We need to be able to name and define the components of this issue precisely and allow for those names and definitions to evolve as the underlying challenges morph and, hopefully, our grasp of them simultaneously tightens. If, as Rebecca Solnit has said, naming is an act of diagnosis, the term fake news is not only obscuring the disease but also feeding it.

Plus, a benefit of sweeping away the anti-press rhetoric is that it might make space for press-affirming rhetoric. As journalism scholar Nikki Usher has argued, in rejecting the term fake news, “an interesting branding opportunity to possibly restore trust in journalism” exists. Journalists are engaging in this to some degree. As one example, Usher pointed to a New York Times campaign of handing out “truth buttons” at events—pins saying things like “The truth is hard” and “Truth: It’s more important now than ever.” Far beyond this, journalists are working in numerous ways to rebuild trust and faith in their discipline. For example, researchers and academics at University of Texas’s Center for Media Engagement are testing the impact of what they call a “Behind the Story card” offering “information about why and how a story was written.” The American Press Institute and Reynolds Journalism Institute also have a project called Trusting News that provides journalists trainings and resources regarding how to build more trust in their reporting and stories. Other efforts abound.

But individual press advocates must also play a role. The press needs those who believe in its work to be amplifying and generating these pro-press messages whether it be in scholarly articles, public speaking, social media, or conversation. As Whitney Phillips counsels when it

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77 Renee DiResta (@noUpside), TWITTER (Feb. 8, 2020, 11:29 AM), https://twitter.com/noUpside/status/1226181774390087681.
79 See Wendling, supra note 9 (quoting Claire Wardle as saying, “If we're going to start thinking of ways we can intervene, we're going to have to have clear definitions”).
80 See Solnit, supra note 19.
84 Helping Journalists Earn News Consumers’ Trust, TRUSTING NEWS, https://trustinnews.org/?source=post_page-----------------------.
comes to remedying information disorder, we need to understand our own agency. Phillips advocates that “[t]o have any hope for a different future, we must survey the landscape, consider where our own bodies stand, and ask: How might what I do here affect what happens over there?”\footnote{Phillips, supra note 9 (emphasis in original).} Although a variety of means exist for supporting the press (including financial ones), we can each support high-quality journalism and the press with our words.

**CONCLUSION**

“It is important to remember that language itself is a moral medium,” wrote philosopher and novelist Iris Murdoch.\footnote{Maria Popova, *Iris Murdoch on Storytelling, Why Art is Essential for Democracy, and the Key to Good Writing*, BRAIN PICKINGS (July 18, 2018), https://www.brainpickings.org/2018/07/18/iris-murdoch-existentialists-mystics-philosophy-literature-art/.} “[A]lmost all uses of language convey value.”\footnote{Id.} As a phrase, fake news devalues. When used uncritically—without explanation or interrogation—it has the potential to undermine an already besieged press.

It is, of course, right to critique the press. The press, the journalists who comprise it, and the journalism they engage in are all imperfect. But fake news is not reasoned or thoughtful critique. It is a hazy and often hastily-applied label that can erode trust. Harm can result regardless of whether the speaker intended harm.

The press is already unthinkably fragile. Law may provide a thin layer of bubble wrap around it, but it does not guarantee the press’s safe passage into the future. To protect the press, we must take care with the language we use to talk about it. That language can promote trust in and respect for the press and journalism as a method. Or it can suggest news is just another form of pollution in our damaged information ecosystem.

The right language is not only essential for the purpose of protecting the press so it can continue its democracy-promoting work. It also helps us to better understand the pollutants in our information environment and work to remediate them. And it helps allow the press to be a force in that remediation providing truthful, contextual, and newsworthy information to the public.

\footnote{Phillips, supra note 9 (emphasis in original).}
\footnote{Maria Popova, *Iris Murdoch on Storytelling, Why Art is Essential for Democracy, and the Key to Good Writing*, BRAIN PICKINGS (July 18, 2018), https://www.brainpickings.org/2018/07/18/iris-murdoch-existentialists-mystics-philosophy-literature-art/.}
\footnote{Id.}