Bachelor thesis

Privacy, security and cybersurveillance – a content analysis

Analyzing the National Security Agency and Snowden in newspapers

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Introduction

June 2013. The Guardian runs a story that directs all eyes on the United States' government. Edward Snowden, an employee of the National Security Agency, suddenly becomes world news when he reveals classified documents on the practices of his employer. It seems that extensive data has been collected within on the US population. However, revelations do not stop there. Also non-US persons are the target, as they are also monitored by the NSA and data on their internet usage is being stored and analyzed. This collecting of data goes international and also affects Germany, Brazil, Canada and India, supposedly partners of the US (Boyer, 2013). It has brought shame to the United States' government, as it has severely hampered its international relations due to the resulted breach of trust between countries. On a national scale, it has also left scars. Supporters have made claims on the legality of the actions of the NSA, as they fall within the scope of the Patriot Act but are nonetheless extremely invasive and without direct consent from the citizens. Such invasive actions on a person are justified when there are reasonable doubts against his innocence and the person is considered to be a threat to national security (American Civil Liberties Union, 2010). The NSA officially does have the legal authority to back up its actions, as courts approved the measures of surveillance.

Edward Snowden was put under scrutiny by his revelations. He did not seek mass media attention and wished the focus would simply lie with the US government (Greenwald, 2013). His intentions were to inform the public on what their elected government had done as he opened a intensified debate on the right to privacy from government intrusion. People were unaware of the spying prior to the revelations, but knowing it did not seem to make matters better, as the legality of the NSA was in fact present. Snowden's actions were known worldwide and he was followed by all when he decided to flee the United States, as he was no longer safe from prosecution. Feeling he had done nothing wrong (ibid) he continued to release classified information to inform the public. This information also concerned the NSA's path towards retrieving information. The agency was able to collect all kinds of data on the public, such a telephone records and internet behavior and could do so with the use of highly sophisticated technology (Landau, 2013). Although surveillance has been present since the dawn of men and used for example during First World War (Katz, 2014), the technology has improved significantly since and the measures are thus far more invasive than ever before (Schneier, 2014b). His actions conjured up a heated debate still alive today.

It made the connection between the rights of the citizens and the rights of the state. The NSA, and indirectly the government, breached the right to privacy as they entered the private sphere of the citizen without their knowing and without their direct consent. They retrieved and stored personal information through invasive surveillance. It was clear that both parties stood directly across from each other in this debate: the public hampered on privacy and the government put the emphasis on surveillance. The actions of the government are explained through their wish for security. To spy and monitor is to ensure public security and this is believed to be achieved through the NSA. As the name of the agency states, National 'Security' Agency, it is there to protect them. Thus, they see security as a goal and surveillance as a means to achieve said goal. However, the public might disagree. Although the government is of course there to protect their safety (Zedner, 2003), the public has a constitutional right to privacy and this right is breached each and every single time surveillance is a an issue. This leaves a debate open for the issues of privacy, security and surveillance, as all three are conceived and portrayed in terms of actor's interests. There is no possibility for privacy when surveillance is placed upon someone and there cannot be security without surveillance. This thus leaves room for discussion as to how far surveillance in our current time has in fact influenced our privacy and security and which concept is deemed

more important. The NSA certainly examined that the public is unaware of all the technology used to keep them under surveillance, in order to protect their privacy and provide security.

However, this struggle is perceived differently by some. According to some, the battle between privacy and security is long gone and privacy has lost (Sterner, 2014). With the upheaval of cybertechnologies capable of entering our lives, privacy is surrendered. He clearly stipulates the public as being the one giving up this right voluntarily, as it is an easily made sacrifice in order to make use of the modern-day technological advantages. Information steps out of the private sphere as soon as an individual voluntarily shares it, according to Sterner. However, privacy in terms of its position toward security is not a given necessity (Schneier, 2008). The two concepts are not in a zero-sum game where only one right can win. Rather, if people were forced to make a choice between privacy and security, they would choose the latter. Privacy is unique and a social need, whereas security is vital for our prime survival. The situation at hand, where the government specifies its practices through scare tactics often results in people favoring security over privacy, as they are fearful. Furthermore, privacy at heart is not about hiding information (Schneier, 2006). Although the government often uses this approach in order to pride information, as "if you aren't doing anything wrong, what do you have to hide?" can be a powerful tool, it is unjust. Rather, privacy is a necessity for if it is lost, information via surveillance is open for abuse. Abuse from those in power, even when there is nothing to hide and nothing wrong is being executed. However, some see surveillance as an efficient tool, needed in today's society and deemed normal in that sense (Lyon, 2003). If the government sees deems it necessary in order to keep the public safe, then that is just a consequence we are faced with in a modern world.

Snowden has tried to stir a debate on and between these concepts. The focus of this research lies with the concepts of privacy, security and surveillance and their place within society. The debate on these matters is displayed throughout different media and this research will focus on the media of newspapers and their broadcasting on the issue of the NSA and Snowden. People rely on the media as a main source for information, especially in times of a major event (Ball-Rokeach & DeFleur, 1976). The media determines the kind of information they distribute and construct their vision on the topic at hand. The struggle between privacy, security and cybersurveillance resulting from the revelations of Snowden is present globally. Within this research, the focus will lie on comparing this struggle within the Netherlands and the United states through a content analysis. A content analysis investigates discourse and choice of language, as language is formed and established through the social world and spheres in which we all life (Jørgensen & Phillips, 2002). This is exactly the direction of this research, as the focus is really on how the concepts have a place within the social media of newspapers in time of Snowden and the NSA. Such an analysis is a coding operation and allows data, here the newspaper articles, to be transformed into a standardized form, according to Babbie (in Kohlbacher, 2006). The concepts of privacy, security and cybersurveillance are broken down into categories to be measured within the data. Guided through literature on each subject, each concept will be explained and theorized as to be conceptualized and able to put into the content analysis.

The main interests of this research can be put together in the following question: *are there differences in the use of language in four newspapers in the Netherlands and the US on the issue of the NSA and Snowden in terms of privacy, security and cybersurveillance?* The differences will be found within the given dataset, which is newspapers from the four newspapers in the time-period of the 5th of June up until the 5th of September 2013, as the time in which the revelations were brought forward.

The first chapter will be the conceptualization of privacy, security and cybersurveillance. Here, the concepts will be explained and elaborated upon through the eyes of different authors within different timeframes. Definitions of concepts change through time (Baghai, 2012), making it important to also view the concepts in prior times. Technology has changed society and its developments of the last eras have played a role in the substance of surveillance (Lyon, 2003), so it is important to take this into consideration in today's definition of not only surveillance, but also privacy and security. Following is the second chapter on the method itself, being content analysis. Here, this method will be explained, as well as the collection of the data and the main methodological choices that together form the analysis. This will result in an understanding of the then following chapter, which is the actual content analysis of the data. The three concepts will be treated separately, in order to focus specifically on every concept within both countries. Conclusions will be drawn here as to answer the research question in the last chapter. This chapter will also constitute practical implications of the research.

The next chapter will be the on the explaining and identifying of the concepts of surveillance, privacy, security and cybersurveillance.

1   Theoretical framework – defining the concepts

This chapter will focus on the conceptualization of surveillance, privacy, security and cybersurveillance. Although these concepts are often used in conversations and discussions, defining real boundaries as to the exact meaning of any concept is rather difficult and often leads to vagueness (Baghai, 2012; Solove, 2002). In order to answer the research question through a content analysis, clear conceptualizations are necessary. The content analysis will shine light on the wording and framing of the articles by focusing on particular words and their place within the data. In order to specify on the three concepts, clear conceptualizations are thus necessary. It will allow a coding scheme, which is the founding stone of the analysis itself by implementing the found conceptualizations in a clear overview, so that the concepts can be measured within the dataset.

As society struggles daily with balancing the importance of each of these concepts, it leaves the question to the framing. Both privacy (Solove, 2002) and security (Miller, 2001)as necessities, difficult to conceptualize as they are not easily perceived. However this within the context of surveillance tends to clash. People are not that keen on giving up their fundamental right to privacy and in turn feel like they are being monitored everywhere they go. Their information is used without their knowing and consent, leaving them very exposed and spied upon (Lyon, 2003). This notion stands directly opposite to the fundamental need and right for security. However, in the eyes of the government, surveillance is the way to keep the public safe from harm. In an every globalizing world the emphasis on technology has become clear and surveillance has shifted towards cybersurveillance (Lyon, 2003). This new kind of surveillance allows them to keep tabs on the society, the outside society and the threats the latter one poses upon the former. In order to protect and safeguard the public, the government needs to check up on them and this entails handing in the essential need for privacy.

Firstly, surveillance will be explained, using the work of Foucault's Panopticon. This frequent quoted author used Bentham's notion of how a prison ought to function, issued in the 18th century. Foucault saw the function of the prison as the way a society should work: on the basis of surveillance. As it was written in an era without technology it can be connected to the previous society, where the electronics did not yet play a role. This will be done in order to establish a conceptualization of surveillance firstly without the notion of technology, as to be able to see its concrete role in society today. The Panopticon will be used as a stepping stone towards cybersurveillance. As cybersurveillance is a modern concept, with technological brand marks, it too will be conceptualized and will replace surveillance as a concept within the analysis. Secondly, privacy will be elaborated upon. Privacy is in sharp contrast with surveillance, as the one hinders the other throughout its process of functioning. It is however a fundamental right and highly valued in society, which makes its conceptualization all the more applicable, as to sharpen the contrast between it, security and the means of surveillance. Thirdly, security. Although it is a right, it is believed to constantly win the ongoing fight with privacy, as the former is often considered more important in the eyes of the all powerful state. Security is favored above privacy in this respect and surveillance is seen as a way to achieve security. However, another contemplation is one in which people do favor security, but do not wish surveillance to be the consequence of it.
Lastly, cybersurveillance will be conceptualized. Using the concept of surveillance as a starting point to emphasize on the modern use of electronics, a shift will be made. The connection between an era in which technology did not play a role, i.e. the Panoptic society, to an era where it became unbearable to live without, i.e. today's society. This concept will take the place of surveillance, as it is seen and conceptualized as the correct and present day idea of surveillance.
The sequence of surveillance, privacy, security and cybersurveillance has been chosen in

order to start with the Panopticon and to be able to elaborate upon the notions of privacy and security somewhat before moving towards the conceptualization of cybersurveillance. This in order to really bring the latter concept in the present era, as it is faced with all the concepts. At the end of this chapter, all four concepts mentioned will have been conceptualized and the three for the analysis will be brought into the content analysis.

1.1   Surveillance: from the Panopticon onwards

The concept of surveillance will be used to correctly state its modern variant, being cybersurveillance. The work of Foucault's Panopticon will be used to draw from it the main aspects of surveillance at its core, being firstly without technological advantages. The main purpose here is thus to conceptualize surveillance in such a manner it can be used to draw on the most critical aspects of the concept at its core and move towards conceptualizing cybersurveillance. The emphasis of cybersurveillance will be on the technological characteristics of the measure.

Surveillance has come a long way. Where it was once used for the purpose of wiretapping criminals for judicial prosecution, it has now become a feature of society (Lyon, 2003). However, so has privacy. It is deemed as vitally important in any society and seen as a universal value. One can understand that these two concepts collide, as they cannot function on the same level. One of the two has to die so the other can survive, but the question then arises is on which concept to put importance. Opinions on this matter differ and this is of course the direction of this research. Some favor privacy, as it is their constitutional right and it is the law upon which any state is founded. Others favor surveillance, as it is linked to the idea that if the government is watching, people are safe from threats. Here, the link between society and the Panoptic version of it can be made, as the latter is one in which privacy is no more, as every individual is monitored (Simon, 2002). One might have been able to be secure and private at the same time, but one cannot be secure and private in a society in which surveillance is deemed appropriate to achieve a level of security.

Bentham, a legislative reformer, wrote how he envisioned a prison (1791). He saw one in which control over subordinates was key and placed upon them in various manners. The guards of the prison were stationed in a tower which provided a one-way gaze, as the inmates could not see whether or not they were monitored. This created a great uncertainty in a confinement thusly structured to render privacy infeasible for the inmates (Strub, 1989) (Lyon, 1994). This gaze which was created, as Bentham put it, was wide and through making all visible, but remaining invisible itself (Shawki, 2009). As Simon (2002, p. 5) puts it, they reached a point where they inmate began to watch himself. Hoping not to draw attention to himself, he adjusts his behavior accordingly as he rationally assumed he was monitored (Lyon, 1994; Strub 1989). This uncertainty, together with the ideas of solitude, created what Lyon (1994, p. 63) called "the only effective instrument of reformative management". Their control over the inmates was reinforced by the gathering and keeping of information and knowledge in the main tower.

Foucault saw more than just a penitentiary where this kind of hierarchical construction could effectively take shape. He saw a society in which the main ideas of the Panopticon could be placed within, as the prison of Bentham could be used in any setting, where-ever a situation arose in which it was needed to control a large number of subordinates (Strub, 1989). Foucault envisioned a government administration following these lines. One with a society where control over the public was feasible, as both the society and its values had shifted. As said by Mathiesen (1997, p. 216-217), the work of Foucault bares with it three intentions , or shifts: in nature and punishment, in content of punishment and in broader change in social order. The latter, the change in social order, depicted a society where the few saw the many.

The few can of course relate to the government and its gaze upon its subordinates, i.e. the population. This would be a society where hierarchical power creates an ever present observation over the public, without it knowing whether and how it was watched. This would mold people in such a way as to be his or her own guard (Lyon, 1994), as they would live and act in total uncertainty, making the actual presence of surveillance redundant in a way (Shawki, 2009).

Foucault correctly drew the Panopticon to his own view of society, whether it be just or not. When pursuing also the aspect of isolation within the government administration, this does not work. Krueger (2005) mentions the inability to maintain isolation of subordinates, as surveillance in order to fully control and discipline individuals would entail the guarantee of no horizontal communications between them. Moving on to the relationship of the government and the public, as the former is in a position to impose control over the latter. The government is the highest authority in a country and has a position of power. On the other hand, Bentham's inmates were not in the position to fight back. As inmates, they were placed in a position in which all their rights were taken away. In a democratic society, people are allowed to fight back and voice their arguments against the government. Having said that, the one-way gaze drawn by Foucault with reference to society does not necessarily hold true in all cases. The public can view the work of the government and impose sanctions, i.e. determination of its members.

However, the government works, as is commonly believed, in the web of the many laws upon which a country is founded and these laws tend to be quite flexible if they see fit, in terms of weighing different key values, such as privacy and security. The uncertainty and the gathering of information does hold true, as has often been the case in the last few years, as has been shown by for instance the NSA.

The main notions here are control over the inmates, a one-way gaze, the uncertainty of the act of surveillance and the accumulation of information and knowledge on the inmates (Lyon, 1994). The sheer notion of surveillance was deemed enough to keep the inmate or the public in one line and to secure obedience. This obedience created safety, as people did not want to draw attention and would thusly behave and do no harm. Although this seem a bit dictatorial, it does stipulate a society that resembles today's. Privacy has been taken away in order to achieve security. As those two might in essence seem to get along, surveillance as a means to achieve security does not. Surveillance as depicted in a Panoptic society cuts through the relationship of being safe and private; the public was watched, knowingly or unknowingly, and this created control over them and over their information, which was kept in an impenetrable tower. These notions together will create the conceptualization. From hereafter, surveillance is seen as:

The collection and storage of personal data by the government, gathered by monitoring, knowing or unknowingly, individuals.

The main notions mentioned above are woven into this conceptualization, albeit not specifically. For instance, the one-way gaze is not mentioned per se, but is given by stating that the monitoring is done by the government on individuals. The next section will focus on the conceptualization of privacy, from its starting point to how it is perceived today.

1.2   Privacy: from community life towards an individualized society

Privacy, in its many ways of framing, carries different meanings when laid down in different disciplines. The foundation of privacy is the fact that an individual wishes to maintain control over his own information and share it upon its own request (Leino-Kilpi et al., 2001). That is to say, this carries core issues of the definition of privacy, such as control over one's information. However, as is to be expected as it is the aim of the analysis, this does not lay well with surveillance lurking around the corner. Surveillance, as has been shown, constitutes entering someone's personal bubble, with or without consent. The problem between privacy and surveillance occurs when this entering is set in motion without the individual's consent and this is the current situation. Although the government is chosen and put in power by its citizens and perceived to act according to the will of the people, their acts have often been conceived as unlawful (Granick, 2013). They constitute a direct breach of privacy and nowhere is such mass surveillance explicitly approved upon in federal law. The NSA was able to capture extreme private data such as political activities, religious admirations, and so on. For any agency to be able to monitor private and personal information without consent, which has not been granted by the persons in questions, is simply a breach of privacy. However, as the conceptualization of privacy is to take place here, there is a need to mention that this is not an easy task. A short overview of the concept's history will be elaborated upon first, as to also draw the connection between its upbringing as will be done between surveillance and cybersurveillance. Any conceptualization is heavily dependent upon its time sketch, as they are formed by the realities of particular periods of time (Solove, 2002).

The notion of privacy surfaced hand in hand with individualization, as privacy began when the individual was shaped. In the olden days, life was perceived as fruitful when it was lived through the community and it was one's civic duty and virtue to always act with the common good of the community as main motivator (Held, 2006). The person as an individual, with his own preferences, ambitions and opinion, did not exist and this deemed privacy as unnecessary and simply non-existent. The community thrived on tradition and unity and it was not until the Reformation that the individual was born. The Reformation can be seen as a starting point of the individualization of the West European societies. It was when the shackles standing as one group came off and gave room for individual people to decide upon their place with reference to God. The common morals and social conducts on which the societies were build were breached and community life was replaced by an individualized society. The increasing autonomy of the individual allowed a person to specify his own values and norms and take control over his own life. The very notion of privacy and a person's place on its own surfaced here, as a tool to keep intruders out and to safeguard one's personal autonomy (Ossewaarde, 2013).

Modern society moves on from there. In today's post-individual society, technology has pushed our sense of community further. It plays an immense role in everybody's day-to-day life and has created virtual associations (Ossewaarde, 2013) functioning without a strong sense of commitment or autonomy. This in fact clashed with the individualized society, as these form the basis on which individuals can characterize their identity through choosing associations and do not co-exist with a lack of autonomy in the post-individualized society. Privacy is threatened if autonomy is no longer a presence, as people no longer truly connect to their norms and values, who are deteriorating due to the virtual nature of the associations. This creates a society in which the NSA is not that far away. Since privacy rights were far more crucial and significant in an individualized society, they are far easier breached in the post-individualized society (Solove, 2008). Although it has indeed become a global affair, it is not a shock.

Privacy, as put forward by Altman (1976, p. 8), is "*selective control of access to the self or to one's group*". In another paper, Altman (1977, p. 67) placed emphasis on the

processes in which privacy plays a role, being on dialectic, optimization and multimodel processes. He puts culture forward as defining the core of privacy itself, as it is within a culture that one interacts with others. A person's ability of being an individual is dependent upon being able to fine-tune interaction with the environment. If this is not the case, a person cannot function properly. However, as he puts culture forward as playing a role, the notion of privacy may thus alter between cultures, as differences between cultures exist in terms of behavior, norms and values. The main notion to draw from Altman (1977, p.68) here is that, universally speaking on privacy, the ability of a person to arrange interactions, sometimes closed and sometimes open, depends on circumstances and this aspect can be perceived throughout cultures.

This vision is shared by Westin (2003, p. 431), as he classifies privacy as *"claim of an individual to determine what information about himself or herself should be known to others"*. He goes on by classifying privacy in different levels, being political, socio-cultural and personal. The political level is most appropriate within this research as it concerns the relationship between an individual and the state. Westin (2003, p. 432) states that the sharing of information may be conceived as appropriate when dealing with public affairs and surveillance is approved in terms of controlling illegal acts. The challenge herein lies, he claims by referring to his previous work, to orchestrate this underlying tension between privacy and surveillance in such a way as to maintain democracy and the continuing changing nature of social dimensions, technology and economy. Lastly, he emphasizes on the critical point of one having the right to alter perspective. A person might want to be left alone one minute and be in conversation and thus open the next, but it is one's own right to choose. It serves the functions of managing social interactions, how to interact with others and the development of the self-identity.

Leino-Kilpi, Välmäki et all. (2001) characterize privacy in the same fashion, as omitting importance upon control over information and the choosing of including or excluding oneself from the arena. The emphasis is put on control, as it can be seen in two ways; control over communication with other people and control over information about oneself (ibid, p. 664), thus constituting selective control. Privacy is broken down in four fields, being social, physical, psychological and informational. As this research is dealing with technological aspects, only the latter will be used, characterized as a right to determine when, how and to what length information about the person will be released. This informational privacy is breached when information is issued without consent/will (ibid, p. 666). Thus the focus is again put on control. However, as Tavani and Moore (2001) perhaps correctly perceive it, if privacy is to depend on our control over it, privacy will never exist in a world where technological developments never end. Although Leino-Kilpi, Välmäki et all. (2001) distinguish between desired and achieved privacy and claim that there is optimal privacy when those two are equal, there is some sense into being pessimistic and following the ruling of Tavani and Moore. Technology spreads and is powerful and is impossible to control and thus optimal privacy in that respect cannot be achieved. However, personal information is to remain private even though no control can be placed upon it (ibid).

This happens to be the precise predicament today's population is faced with, i.e. the subordinates as Foucault lovingly calls them. The technological mindset renders any sense of privacy obsolete and any control over it vanishes in thin air. Privacy, as a moderately new concept, calls upon leaving the community life, where the individual did not exist, behind. The autonomy of the individual was created when the Reformation in Europe created the idea privacy. Societal changes had made the existence of such a notion possible, as the individual was born and could upheld a life outside the community. However, society has even gone

further and jumped into the post-individualized society which lacks personal autonomy which in turn threatens privacy.

Different visions on privacy have been put forward. All agree upon the fact that privacy is not conceptualized easily, as it is not confined within a given and set territorial space in society. There are in fact different dimensions and processes to monitor before relating to the concept of privacy itself. Altman (1977) puts culture as the key to defining privacy, as it is within a culture that interaction takes place and it is within a culture that the issue of privacy thus surfaces. As a culture defines behavior, norms and values for an individual, there cannot be a universally agreed-upon conceptualization. However, all cultures relate to the fact that privacy refers to the ability of a person to set interactions and keep them open or closed. That is to say, cultures do share that core aspect of privacy (Altman, 1977, p. 68). This implicitly refers to control over the situation. Others, such as Westin (2003) and Leino-Kilpi, Välmäki et all. (2001) also refer, implicitly or explicitly, to the issue of control when contemplating on privacy. Westin (2003, p. 431) states that privacy is in essence on determining what information can and cannot be shared, but goes on to refer to a political level of privacy. This level constitutes that the sharing of information is legitimate when dealing with illegal acts. The key here is to find a correct balance in terms of democracy and surveillance.

Control over communication and information is put forward by Leino-Kilpi, Välmäki et all. (2001)) and is reputed to some extent by referring to Tavani and Moore (2001), who claim that privacy is not feasible in a technological era if it is viewed in terms of control. As technology grows, the control diminishes and the growth of modernity cannot be stopped. Privacy is in fact breached when information moves without consent. People wish to choose who to grant access into their private sphere, but this cannot happen in a post-individualized society. Surveillance is a fact and this hampers privacy, as it breaches the core of privacy to its full extent by collecting information without consent. The factor of control has been jeopardized, in the sense that it does not exist to the full extent of its meaning anymore. This is not to say that whenever control cannot be placed, information is not private (Tavani & Moor, 2001). However, in terms of governmental control and their way of achieving said security, surveillance is present and does conceptually stand directly opposite from privacy. Privacy issues a right to close oneself off from the outside world if one wishes to do so and is breached whenever information has been transferred without permission. These notions together will create the conceptualization. From this point onwards, privacy is:

The right to control, i.e. decide upon releasing or not releasing, personal information about oneself.

This conceptualization revolves on the issue of control, as it is the key foundation of privacy as brought forward above. It is on deciding as an individual on sharing or not sharing of information. Privacy has been put in a very uncertain position: it is deemed important and valued, but certainly not a given. Although established as a right, it has also been proven that the government is able to take that right away from the public if the greater good is at stake. The same can be said for security: it is important and valued, but not a given. The government plays a role in this concept as well, as they are the key actors to grant security to the public. However, when discussing the term of surveillance in this paradigm, privacy and security cannot co-exist. The next section will focus on security and its conceptualization.

1.3   Security: focus on the individual

Security, with respect to cybersurveillance, has often come into clash with the notion of privacy. Privacy favors leaving a human being be and security puts safety before all else,

downplaying privacy. These two core values tend to clash when put in front of the issue of cybersurveillance. Privacy and security can go together up to the point that surveillance is put forward as a means to achieve security. This is precisely what the government has decided to do and perceives as necessary in order to keep the public in line and out of harm's way. Security is necessary in a technological and global society, as opening the borders, online and offline, puts a country at risk. As the government is both there to protect people's safety and set privacy as a core value, they do however see monitoring the public as a way to achieve their security.

The classical model of security, in which states combat threats in order to secure their territory and autonomy is focused on a relation between states (Bajpai, 2000). However, this notion of security as perceived within the notion of the state has been deemed inadmissible, as it focuses solely on the military threats. However, this has been shifted towards including threats from non-state actors, natural disasters, environmental threats (ibid). They can also constitute a threat towards any state in terms of threatening its territory. Bajpai (2000, p. 3)continues to refer to another scope of security, namely one focused on the protection and welfare of the state and its focus on the individual citizen, labeled *human security*. This idea surfaced after the 1980s, when it was clear that effort needed to be put towards a stable and secure world, after wars and economic disasters. As the process of redefining security (Miller, 2001) and defining human security rose, the focus came to lie within the security of the state, namely that of the individual (Bajpai, 2000). As adequately put by Romano Prodi, former Italian prime minister, "the problem of the safety of the country seems to be no longer one of *external* safety, but an *internal* one: the safety of the citizen in their everyday life" (in Zedner 2003, p. 153).

Conceptualizing security requires, unlike has been done with the conceptualization of privacy, a clear link towards the threat of terrorism. Baldwin, in Bajpai (2000), stipulates that in order to conceptualize security, there first has to be an understanding of what the problem is. This would require, as the concepts put under question here are forced to co-exist due to the problematic issue of terrorism, to put terrorism as a threat under this conceptualization. This also constitutes a shift in terms of main actors. Privacy has a direct correlation with the government, i.e. the government is both the protector of this right and the violator at its core. Security in that respect, enlists the government as the sole protector and terrorism as its main threat, thus incorporating another actor in this sphere. Therefore, although terrorism has not played a part in conceptualizing privacy, it will however do so in conceptualizing security.

An individual is secure, according to Miller (2001, p. 16), when there is no one to pose a threat to its values and even with such a threat, security will exist as long as the individual has the capabilities to defend itself. These values have shifted throughout the years and lie now with human rights and needs, when speaking of an individual level of security (ibid, p. 22). Although Miller (2001) states his direction toward security, Bajpai (2000) touches the core issue where Miller's version is rather vague and incomplete, as values are very broad. A clear-cut conceptualization needs to include security for whom, of which values, from what threats and by what means.

Zedner (2003) separates security in objective and subjective conditions. The first constitutes being without threat, being protected from existing threats and avoidance of danger (ibid, p. 155). The latter involves abstract ideas, feelings: feeling safe and without anxiety from a sense of insecurity (ibid). These two conditions are correlated, as they both constitute an issue within security. Furthermore, Zedner constructs security in terms of negative or positive presence, as a symbolic good, public good or private service and internal or external security. However, he continues, true security is not feasible. We will never reach an era without threats, as they are too numerous to tackle, e.g. drugs and poverty. Even if it would be

possible, there is always a next threat around the corner that requires constant vigilance. Although there is no argument against this, the increase of cybersurveillance and the increase in devices used helps create some sense of security.

When taking on terrorism in this conceptualization, the individual is the crucial actor (Ruby, 2002). Terroristic acts are aimed at non-fighters, i.e. the public and therefore, the focus of the security should also be put on the individual. The values to be protected can be many, e.g. economic, political, environmental, and so on (ibid), but the focus here is on physical safety. Thus to be physically safe from the violence of terrorism. The threat itself is terrorism and terroristic acts. The means here is surveillance, as the public is supposedly kept safe by being put under the microscope. Specify on the concrete threats to the issue itself does in fact help to conceptualize more specifically. Both Bajpai and Miller state values as being something to protect, which is of course of vital importance in an ever globalizing world where values tend to fade. However, it certainly does not help making the concept comprehensible, as values tend to be explained quite vague.

Terrorism as it is known today has shown itself in many forms. This of course refers to the level of violence and casualties, but also to the execution of the attack itself. Where the attack on Israel athletes during the Olympics in 1972 in Munich is deemed a massacre, it is hard to imagine such an attack to happen nowadays. In a technological era and after 9/11, boundaries have shifted. Showing your credentials and being scanned upon entering a governmental building is simply a process to go through every day. This technological era brings with it invisible, electronic dangers. As technology is everywhere, so are terrorists capable of hacking their way into an airborne plane or dismantling paramedics in the midst of an actual attack (Shreeve, 2006). The fact of the matter is that people don't feel secure when the danger is nowhere to be seen and moves electronically and nowadays, both physical and technological techniques can constitute an attack.

It is clear that a conceptualization has to be firmly directed in terms of the threat and the issue at hand which needs protection, as stated by the authors discussed above. The focus has indeed shifted towards the individual and this again shows the importance of conceptualizing within a given timeframe. Whereas the focus used to lie with the security of the state and its territorial magnitude, it the individual who was put on a pedestal when a stable and secure world was to be built. Bajpai (2000) refers to human security when specializing on the individual and Zedner (2003) emphasis the internal security of the state, thus also stipulating the individual as a key actor in this respect.

However, threats against any individual can have many faces, such as starvation and poverty (Ruby 2002). Thus to conceptualize entails security from whom, of which values and from what threats (Bajpai 2000). The threat here is terrorism, as it is the underlying connection between all the concepts. People fear terrorism and feel insecure and it is exactly this what makes the relationship even more difficult. For when you favor privacy above security, the tension between the two will be horribly visible through the occurrence of an attack. Although Miller (2001) states that an individual is said to be secure when it has the capabilities to defend itself, this argument is hard to maintain when the government is an intervening factor. The government is the actor to provide the right of privacy and is the actor to maintain a secure that for its individuals. However, when taking terrorism within this equation, the focus of the government quickly shifts towards security and privacy is put aside and frequently breached due to the invasive nature of surveillance. The government does want to keep its public physical safe from the threat of terrorism, thus deems its action appropriate. Targeting suspected individuals is justified in name of security, as long as the focus is put on securing the whole of society, issuing social exclusion (Zedner 2003).

Security entails physical safety from harm, protection of individual's values . This entails one being watched and viewed, but in a physical safe manner. Though security can be acquired via legislation, also a way to reduce fear, the government opts for the use of cybersurveillance to make the public feel secure (Zedner 2003). This might help to some extent, but renders privacy rather difficult to adhere to and it brings the question of people do in fact feel secure if they feel constantly monitored.

Coming back to the conceptualization at hand, security will henceforth be:

Physical protection from the violence of terroristic acts, as issued by the state.

It is precisely there where the difficulty of the relationship of terrorism on one side and security and privacy on the other surfaces. People are scared of terrorism, especially since an attack can happen in some many fashions. They want to feel secure, but don't wish to feel invaded in their privacy by the government in order to accomplish it. This conceptualization entails the most pressing characteristics, which is the value of physical protection and the threat of terrorism, which lies at the heart of security. It will be used onwards, as the main issues stated above are brought within its scope. The next section will focus on cybersurveillance and its conceptualization by starting with surveillance and ending with cybersurveillance.

1.4 Cybersurveillance: surveillance meets modernity

Lastly, cybersurveillance will be treated. Having surveillance as a starting-point, it is needed to place it in a modern jacket by referring to the technological devices currently used. Even though privacy and security do in fact touch upon cybersurveillance in the way that they form a huge societal part of it, cybersurveillance and its conceptualization will not. The discourse analysis will focus on all three concepts and their use in newspapers, as to correctly take them into consideration too, but the concrete conceptualization of cybersurveillance will introduce technology into the equation. The Panopticon, drawn by Foucault, will be used to make the introduction of the technological aspects clear.

The main points of the Panoptical surveillance was the omniscient and one-way gaze over the inmates, creating uncertainty to keep them under control. Furthermore, information and knowledge on the inmates was gathered and kept (Lyon, 1994). This in turn created docile bodies, meaning subjected and transformed bodies following order and discipline (Shawki 2009). This situation was how Bentham saw his perfect prison and how Foucault saw the relationship in, among others, a governmental administration. Modern surveillance, i.e. cybersurveillance, has the same invasive nature. The government replaces the guards in this sense and the one-way gaze remains, although less extensive as in the prison with regards to checks and balances in a democratic society. By this gaze, uncertainty is used to control the population, not knowing if being monitored, but rationally assumes it is. Furthermore, as from the inmates, the public's information is gathered and saved, far beyond their reach.

Lyon (2003) sees the social sorting of our data as a key feature of surveillance today. Social sorting, the constant monitoring of individuals who are then processed and sorting according to their perceived level of threat, is the way the government works to find threats. More people are however conceived as such, creating the need to constantly renew the devices. However, Lyon continues, the devices are not the root of the problem. They are used to cope with and control an independent and mobile population, as a way to observe and influence its behavior. Surveillance itself must not only be seen as a negative consequence of modernity, it can in fact increase efficiency in today's society. But in terms of privacy in an individualized society, it is seen as an inherent negative feature. This mode of surveillance is, according to Westin (1966, p. 1004), *"the collection, storage, exchange and integration of comprehensive*

documentary information about individuals and groups through computers and other data-processing systems". Moving beyond social sorting is the notion of an information society. This kind of society, although established since the post-industrial society, revolves around information technology and touches every aspect of life, i.e. culture, politics, etc. It is characterized by its daily presence and the inability of the government to keep tabs on the individuals under their rule (Lyon, 1992), as criminals find ways to execute crimes electronically. It are exactly those threats that undermine governments and forces them to retaliate by upgrading the surveillance, in order to keep people safe.

Although cybersurveillance is often been accused of hindering privacy, some simply see its presence as normalizing within society (Krueger, 2005) and beneficial in terms of efficiency (Lyon, 2003). It is simply the best way to monitor behavior, as its speed and consuming of information might anticipate and estimate risks (ibid). However, as Lyon also puts forward, it does leave room for sociological questions regarding its correct place within society, as it too contains risks. It is exactly the modernity of all the techniques which has brought debate with relation to privacy so heated, as privacy has been hit like never before (Solove, 2008).

Cybersurveillance thus places panoptic surveillance in today's modern society. Used by the government for control and monitoring, gathering and keeping information as to sort the public according to its level of threat with regards to terrorism. Lyon rightfully places the problem the other way around, as more people being seen as a threat will undoubtedly lead to more devices, creating a difficult to break cycle. Westin's conceptualization, albeit and old one, involves the technological aspect, which was not incorporated into the conceptualization of surveillance. This is also done by Lyon (2003), introducing the idea of social sorting, which correctly views cybersurveillance, but specifies more on its means than its concrete meaning. As such, cybersurveillance will henceforth be conceptualized as:

The collection and storage of personal data about individuals through data-processing devices, as issued by the government.

Personal data is seen as any kind of information regarding an individual. It constitutes the collection and storage of information up in a big tower, which is brought forward by the Panopticon and puts focus on the technological aspects there are today by being very broad as to refer to devices. Although the one-way gaze is not mentioned within this conceptualization and it is explained to be an important aspect, it is simply assumed here. That is to say, as the data focuses on the issue of the NSA and Snowden and surveillance in this respect is done by the government, having a one-way gaze, the capitation of the data assumes the one-way gaze.

Having conceptualized the last concept will establish grounds on which to build the content analysis. The next chapter will firstly explain the premises on a content analysis as to explain the steps taken within the research. This will result in a clear understanding of what such an analysis entails before conducting the analysis itself.

1.5   Conclusion

The main focus of this chapter was to conceptualize the four aforementioned concepts. Although all concepts are broad in its essence and the conceptualizing was not a concrete and straightforward task, they are all linked together through the underlying actor of the government and their underlying threats. The most pressing issue here is that the concepts tend to strive for very opposing results. Surveillance in its prior time with the Panopticon strove for control over the inmates, i.e. the public, through the installation of a one-way gaze.

As they did not know if and when they were in fact monitored a great uncertainty was created in which all sense of privacy was stripped. Not only due to their complete transparent confinement, but also due to the information which was gathered and kept in the great tower with the guards. Out of their reach and out of their control, the inmates were just to undergo the treatment, as they were confined and underwent imprisonment without the same rights people not locked up have. This issue of the prison can easily be transferred to the society of today, as any sense of control over a large number of subordinates does apply.

Consequently, the control the guards had within the prison is the same control the public strives to have when it comes to privacy. They want control over their personal information in this information society, where data is central, to be able to specify who is allowed to enter their set up personal boundaries at what time. Privacy is in fact a modern idea, but in a post-individualized society where the identity and its values tend to fade, it is not surprising that the NSA found ways to go around privacy rights. The technological advances today can be seen as a gift but nonetheless it is a great curse as well. Control over personal information is not so easily achieved today and privacy often clashes with the notion of security. Whereas privacy favors leaving a human being alone, security wishes to step over those boundaries and inspect the premises for dangers. As the government is deemed the actor to provide both rights, it has chosen security and thus has chosen cybersurveillance, as we live in a world endangered with terrorists.

Security has in fact shifted to protecting the individual, so the magnifier glass has done exactly that; put the focus on the individual who now more than ever wishes to control his life without interference.

Lastly, cybersurveillance places the Panopticon even more in today's society. Social sorting has been deemed normal and is in fact a huge breach of privacy. The public rationally assumes it is watched, which stands directly against all that privacy tries to protect. Safe to say that security and cybersurveillance might be able to live together, as the government sees those two connected. Security will be reached through cybersurveillance, but cannot exist next to privacy in that fashion. For that reason, it is worth investigating how this struggle is being brought about in the newspapers. This will be done in the next chapter. Two newspapers of two countries, being the Netherlands and the United States will be analyzed on the concept of privacy, security and cybersurveillance using a content analysis. This will be done by limiting the scope on the issue of Edward Snowden and the NSA. This analysis is focused on the linguistics within a certain text, as to be able to extract the meaning of all concepts when put together, to be able to process the struggle closely.

2   Methods

The previous chapter stated the three conceptualizations which will be used in the content analysis. In this chapter, the execution of the analysis will be presented, to create a clear understanding of the analysis itself, done in the following chapter. This analysis will be based on a coding scheme, issued to incorporate the main characteristics of all the concepts and count their appearance within the dataset. It will view the concepts in comparison with each other in the Netherlands and the United States. The underlying problem is that they don't seem to be able to co-exist fully in a world where the role of technology is growing and where the mere notion of privacy all together is at stake. Surveillance is highly invasive and some deem it a necessity in order to live in a secure world. This contradiction of course put the administration in a tough spot, as they both have sworn to protect the citizens and also their privacy. However, others might value their privacy too much to allow the government to come so close in their personal life.

Be it as it may, it is clear that the tension between these concepts is worth investigating. Because the dataset used here is a set of texts and produces interaction, an analysis based on discourse is needed. It is in any discourse that the debate regarding these three concepts will occur, and this in turn will give some insight in the struggle of the concepts in the US and the NL, as portrayed by newspapers. By focusing the research solely on the language use and the role the three concepts brought forward in it, it can be made clear how the struggle has found a place in the newspapers, as it can be seen as an important gateway of information for the population. All in all, the focus of this chapter is to elaborate upon the chosen method of research and present the coding scheme on which the analysis of the next chapter will be based.

2.1   Content analysis: explanation

Discourse itself is a daily phenomenon. As "*an interrelated set of texts, and the practices of their production, dissemination, and reception, that brings an object into being*" (Gerring, 2004, p. 3), discourse is always present in one's life. It is that what creates the social world in which we live. Books, newspapers, television reports, body language, and so on, all are part of discourse, as they together form the sociality of the world. Language, the key aspect of discourse, is created through the day-to-day choices of people concerning the social spheres they choose to surround themselves with (Jørgensen & Phillips, 2002). The analyzing of this discourse can be seen as a means to categorize semiotic elements of social life. Daily language, such as found in newspapers, but also body language falls within the category of discourse (Fairclough, 2012, p. 453).

A discourse analysis method puts emphasis on the way the social reality in which the text was shaped is produced, allowing the text to be analyzed and scrutinized within its cadre. As such, within this method, it is believed the text only holds merit within the context, having no meaning on its own (Phillips, Lawrence, & Hardy, 2004). As the NSA-affair with Snowden in terms of privacy, security and cybersurveillance is under question in this research, a different approach to analyzing discourse is chosen, being content analysis. A content analysis, although closely related, differs. With its scientific aim, it holds true that texts and their meaning is constant and can be treated consistently by various researches, given that they follow the same analytical procedures. The contextual background has no place, nor do the intentions behind the text and the reaction of the audience (Phillips, Lawrence et al., 2004). To concretely compare the two would result in stating discourse analysis as textual research where the nature and the meaning of the text if key, to track its shifting within the social context. Content analysis does neither, as it assumes consistency in

its meaning, giving room to count frequencies of words within the text, focusing on the text itself, leaving its context behind. The latter is brought forward by Neuendorf (in Gerring 2004, p. 33) as *a summarizing, quantitative analysis of messages that relies on the scientific method"*.

Although both are in fact on the issues of analyzing texts. Content analysis is objective, systematic and quantitative. Objectivity relates to the categorizing, which will be done in the coding scheme. This analysis is a coding operation in which raw data is transformed into a standardized form, following Babbie (in Kohlbacher, 2006) based here on the explicit presence of a concept (Carley, 1990). Systematic in the sense that the rules of including or excluding categories is clear and quantitative as to amendable statistical analysis (Hardy, Harley et al. in Gerring 2004, p. 20). As to the real difference between this and discourse analysis, content analysis sees the meaning of the text as constant and be drawn out by other researchers as long as the appropriate procedures are followed. It holds no relation to the meaning and context of the text in the outside world, unlike discourse analysis.

However, as is often the case within any type of research, content analysis has its pitfalls. As Titscher explains (in Kohlbacher, 2006), its main problems entail inference, reliability and generalizability. Inference entails the making of assumptions on the whole of the text based upon a single text and assumptions on underlying constructs based on the text. Reliability refers to the coding itself and its trustworthiness and entails inter-coder reliability. This sort of reliability is crucial, as it requires multiple coders to agree on the coding, making the coding is essence thus stronger and more reliable. Generalizibility refers to the ability to apply findings of a research to a population. As the focus of this research is on only four newspapers, as has been discussed prior, this conduct is not generalizible. In order for it to be, the data would have to be more extensive and cover more sources of information, meaning here more newspapers. As will be explained in the next section, this could not be the case. However, this of course does not wave away the problems of inference and reliability. As a strength of content analysis is its methodological control and the step-by-step analysis of the material (Kohlbacher, 2006). At its core is the category or coding system, which are drawn from the material. In other words, the theoretical framework given and upon which the coding scheme is based grant the openness of the analysis. This shows the origins of the coding scheme and the reasoning behind it, increasing its reliability by introducing the steps to other readers and allowing them to follow the same reasoning. However, the coding here will not be conducted by another coder, but the openness and scrutiny will allow for a clear understanding of the followed path. Inference will be restricted by the fact that it has been clearly stated that the dataset is articles over a time period of three months, so it will not be able to single out results based on one single sample text.

2.2   Method of data collection

For this content analysis, articles will be the data. Newspapers can be seen as an important source of information many people turn to when a critical issue is present in society (Ball-Rokeach & DeFleur, 1976). As the issue of Snowden was a pressing issue in society, the newspapers are qualified as a data-set for this analysis. Articles from in total four newspapers will be gathered from the Netherlands and the United States. These countries have been chosen as they are both based on democracy and hold no censorship, thus not constricting the media in their bringing forth information regarding Snowden and the NSA with respect to the three concepts. The US is seen as an important player, as both Snowden and the NSA stem from this country and it can be interesting to view it in terms of privacy, security and cybersurveillance. As the US' government has played a significant role on legalizing the actions done by the NSA behind closed doors without direct consent from the public, one would expect a debate between the three concepts. As the government favors security through

cybersurveillance, its cuts into the values of privacy, valued by the public. This can result in interesting data from the US. Furthermore, the Netherlands is chosen as the issue of privacy has also played a public spectacle here. Though it is true that this is the case for many countries, the NL is chosen due to the availability of the data. Other possible countries would have been Scotland or England, due to the language, but these had no free online archives from which to draw information.

The data from the countries is drawn from free online archives, derived from the websites of the newspapers themselves. The reason for this specific way is that the articles are accessible to a wider range of people, as opposed to online databases with a fee. People are hesitant to pay for access to online newspapers (Boogert, 2014) and will far more frequently and easily visit free websites for their information search. The four newspapers selected here all have free online archives and constitute as a broad access for information. As the research finds data within four newspapers, generalizability is not the case. This choice has been made in order to direct attention towards these newspapers with free online archives instead of those where people are to pay for access to the information.

For the US, the Los Angeles Times and the New York Daily News are selected and for the NL, de Volkskrant and Trouw. Each two newspapers form the dataset of the corresponding country. The dataset will be drawn from the online archives. All allowed a clear search on the time period, being from the 5th June 2013 up until the 5th of September 2013. The lock was set on that period, as to specify on the broadcasting right after the revelations of Snowden. This will result in a dataset where the initial debate on the three concepts will be most present, as the situation was very alive then. The focus is thereby put on the beginning of the debate and a comparison will be made between the two countries.

The dataset is retrieved from the three months after the revelation, the start of the initial debate of privacy, security and cybersurveillance. In order to come to a comprehensive dataset, it is needed to have an overall coverage in terms of days within the period. Articles within the three months timeframe are then selected based on the headlines. This screening is based on the presence of the words 'NSA'/'National Security Agency' or 'Snowden' in the heading. By only allowing these articles, the dataset would only entail data regarding Snowden and the NSA and would allow the three concepts under question to be measured on the correct topic. In the Appendix, Figures 4a and 4b give an overview of the number of articles which are adequate for the research, thus corresponding with the search within the headline. Although these figures show fluctuations in terms of articles, for both countries the time period is covered. Meaning that the issue of Snowden and the NSA is found throughout the time period and does not halt all together within the period. If this would have been the case, a word such as 'whistleblower' in the headlines could have been introduced. However, doing so does not guarantee the article in question is on the NSA or Snowden and makes the comparison at heart flaw. The issue here is in fact the NSA and Snowden in terms of privacy, security and cybersurveillance and allowing other articles that might or might not be on the correct issue jeopardizes the results. 'Klokkenluider' could refer to Bradley Manning or Julian Assange and 'privacy', 'security' or 'surveillance' does not only respond to Snowden and the NSA and would not result in a good pole from which to work with, as they hold no certainty of relating to the NSA-affair.

This article search resulted in 261 articles from the NL and 192 articles from the US. As it would not be adequate to solely compare the countries based on the number of articles, it is necessary to count the articles in the number of total words. This will result in a comparison of the three concepts given in percentages in a country, as to adequately be able to then

compare it with the percentages of the other country. Atlas.ti is able to count the total amount of words per dataset, being for both countries. This means that all the words, regardless of the specific word, are accounted for. The articles from the NL constituted 76.749 words and for the US this is 160.311 words. Although this is a significant difference, the fact remains that the two countries can be compared on the internal specifications, meaning if the results are given in a percentage of the total of the country. This will lead to a comparative research based on the intended time-period of three months. In the Appendix Tables 10 and 11 give an overview of headlines of the found articles, as to also shed some light on the dates of the articles.

2.3   Coding scheme

The most crucial part of understanding yet again why a content analysis was chosen for this research is to understand the difference between the discourse analysis in its core and compare it to the reasons for which the content analysis is more suitable. As put forward by (Gee & Green, 1998), a discourse analysis lives within a context and the analysis itself cannot undergo any scrutiny without taking the context into consideration. The meaning and value of aspects, the activities and connections are just some of the areas of reality he claims needed to keep into the question (ibid, p. 12). Doing so stipulates an understanding of the why and the how behind the discourse itself. To put it more simple, a discourse analysis in this sense is more directed towards the social side, whereas a content analysis directs itself towards the concepts and their conceptualization on their own. Gerring (2004) sees discourse analysis as being mainly on power relations and the situation in which the meaning of language occurs, which is both outside the scope of content analysis. Wanting to go beyond the social world in which discourse shapes itself, it content analysis. It puts the focus on, within this research that is, counting and assessing the presence or absence of the given concepts within the dataset.

At the heart of content analysis lies the categorizing of the keywords through the use of a coding scheme. By processing the bulk of data through a scheme, the comparison between the two countries on the three concepts can be made. The categorizing within the scheme opens the opportunity to divide the concepts and their conceptualizations, in order to compare. Each concept will be set forward as a category and its keywords fall within it. These keywords are based on the conceptualization done in the previous chapter, as it will consists of the main notion brought forward. For any scheme to function properly and offer a level of scientific accuracy, it has to be valid, i.e. really measure what it is intended to measure (Carley, 1990; Weber 1990). The course of creating such a scheme goes through careful explaining each choice made, as to create understanding and reproducibility. It is the discourse between privacy, security and surveillance that will be examined.

The coding scheme is shown in Table 1. As the crucial concepts are already explained and conceptualized accordingly in the theoretical framework, their place within the research has been elaborated upon, only a short remark on their unsurprisingly presence here will be made. The focus and issue at hand here is how the media in the NL and the US use language within their articles to broadcast in terms of privacy, security and surveillance with respect to the NSA and Snowden-affair. Therefore these concepts, as focus point, will be each seen as a category and will be given keywords according to both their conceptualization and a first glance of the dataset. A side peak to the dataset is made, due to the scientific background of the conceptualizations and this might not overlap with day-to-day conversations and language use in the media. Lastly, the keywords are single words, a simple mentioning of any keyword constitutes the presence of the concept.

Table 1: Coding scheme content analysis (keywords)

	NL	US
Main category	**Keywords**	**Keywords**
Privacy	Controle	Control
	Individu	Individual
	Lek	Leak
	Persoonlijk	Personal
	Privacy	Privacy
	Toestemming	Permission
Security	Angst	Fear
	Bescherming	Protection
	Geweld	Violence
	Lichamelijk	Physical
	Veiligheid	Security
	Terrorisme	Terrorism
Cybersurveillance	Afluisteren	Monitor
	Cyber	Cyber
	Opslag	Storage
	Spion	Spy
	Surveillance	Surveillance
	Technologie	Technology

Moving towards the explanation of the categories and the corresponding keywords. As each concept discussed earlier is considered a category, each holds in its own category the word of the concept itself. So, the category 'privacy' holds the keyword 'privacy'. This is done because the naming of any of the concepts stipulates a direct link to the category and the counting of these keywords will establish direction from the media towards the struggle between the concepts. As can be seen in the coding scheme, the keywords for both countries are similar. The language barrier is indeed a factor in such a research, but for the sake of equality between the categories, translations are in order. By choosing to keep the keywords in line, it is possible to verify if any country puts more emphasis on either privacy, security of surveillance and create a platform for comparison. Furthermore, the keywords are established through the use of the conceptualization done earlier and through a first glance over the dataset of newspaper articles. Both the conceptualizations, based on scientific articles, as well as the newspapers, day-to-day language, are taken into consideration. If this would not be the case, the results might be skew, as they only focus on a specific use of language. Each category is given six keywords. As it is difficult to pinpoint the needed amount of keywords as too many or too few would create confusion in the process of coding, it has been chosen to broaden the scope of the keywords, as to include words that more or less have the precise meaning. These elaborate coding schemes can be found in the Appendix Tables 12 and 13. The issue for the scheme here is to make clear what the main notions of the conceptualization are and how they will be treated in comparison of the countries on the issue of Snowden and the NSA. Therefore, an explanation is in order.

Firstly, privacy. The conceptualization showed a strong favoring of control in terms of privacy. Control over personal belongings upon which an individual has the right to share or not share it with the outside world. Privacy is considered to be breached when information is leaked, thus shared without the individual's permission. Therefore, based on the conceptualization, the keywords here are control, individual, leak, personal, privacy and permission. They constitute the critical aspects of the concept of privacy. Although Tavani and Moore (2001) disagree on the issue of control, it can be interesting to see here, by including control. It allows the disagreement to be measured in terms of the appearance, or

lack of appearance, by the keyword 'control'. Furthermore, although the notion of information is a factor in terms of privacy, it has been chosen not to place it within this concept or another concept for that matter. This will be explained with Table 2.

Secondly, security. It has shifted from the state towards the individual, as they were considered to be the main focus point in a stable and secure world. The state searched for internal security rather than external. The current threat from security, the issue behind it all, is terrorism. People fear ramifications and fear terrorism, as they surface themselves in a most violent way, which is through attacks. People want to be protected from physical harm. The keywords following from hereon are fear, protection, violence, physical, security and terrorism. Although it was mentioned that security has shifted towards the individual, the choice was made to place 'individual' under privacy within this scheme. The reason for choosing to do so is that privacy is aimed more at the individual level and although this constitutes for security as well, the government claims to act for the good of the whole public and chooses to protect individuals collectively.

Lastly, cybersurveillance. In essence based on the Panopticon, cybersurveillance entails the uncertain presence of a one-way gaze, put on subordinates. Through uncertainty, it was never clear whether or not they were being monitored at a specific time, but it was rationality assumed to be the case. Information was gathered and stored, far beyond their reach and without consent. Through the modern day miracle of technology, surveillance has become ever invasive and this requires the term cybersurveillance. This concept is put forward through the keywords of monitor, cyber, storage, spy, surveillance and technology. It entails technological keywords, such as 'cyber' and 'technology', but holds true to surveillance in the eyes of Foucault through 'surveillance' and 'monitor'. Although 'spy' was not put forward by the conceptualization, the data suggested that it is often used to refer to being monitored. As it has a negative outlook, more so than for instance monitor, it has been chosen to examine it separately.

The coding scheme will be implemented into the computer program Atlas.ti 6.2. Coding can be done by hand, but a computer is in fact more automate and accurate than any coder can or will be. Table 2 states some keywords that might have conjured up throughout either the theoretical framework or elsewhere, but are not used as keywords within the research. As to remove any uncertainties regarding the keywords that will be used, a brief statement regarding five of the most common.

Table 2: Keywords that did not make the cut

Keyword (US/NL)	Possible category/categories
Government/overheid	Privacy Security Cybersurveillance
State/staat	Security Cybersurveillance
Data/data	Privacy Cybersurveillance
Right/recht	Privacy Security Cybersurveillance
Information/informative	Privacy Cybersurveillance

First, 'government'. It plays a significant role in the discussion of the three concepts, as it is a key actor in all. It is to produce and protect both privacy and security, which cannot safely co-

exist. Furthermore, it is the engine behind any surveillance, as it is through the law that any such practices even exist. This is why the keyword 'government' is not chosen: if the word is used, it is hard to place it within any given concept and thus not able to create any closer understanding regarding the concepts next to each other. The same goes for 'state', of course. The keyword 'data' is not chosen due to the existence of the word in both conceptualizations of privacy and cybersurveillance. If used, it is not clear in which category it might fall. It might refer to the protection of data, i.e. privacy, or refer to the data collection, i.e. cybersurveillance. The keyword 'right' is simply too vague and as all have a right to privacy, to security and to surveillance, it will not be used. The categories need to be mutually exclusive in order to create a sound content analysis and create non-biased results. If is for that reason that the mentioned words are not place within the research, as their mutually exclusiveness cannot be guaranteed.

The fact that relatively important key words cannot be used without hampering the analysis is on itself a point. It shows the complexity of the situation, as all three concepts are that closely related. In essence, they may not be. They can be seen independently from one another, but the framing and setting it into a scheme provides the difficulty of choosing keywords that do not tend to fall in more than one category. It is for exactly that reason that these are consciously chosen to stay out of the scheme. However, a more elaborate scheme can be found in the Appendix.

2.3.1   Emphasis on Snowden and the NSA within the content analysis

The coding scheme follows the direction of the theoretical framework and the answering of the research question. However, as to comprehensively answer the research question and also relate it to the topic of Snowden, a short explanation is in order. The content analysis will also focus on making a connection between the conceptualizations and Snowden and the NSA in the data. For it is not only the importance of measuring the concepts and seeing their connectedness, the research also focuses on the issue of Snowden. This will be done through examining the data in terms of Snowden and the NSA's co-occurrence with the keywords. Furthermore, it will also constitute Snowden and the NSA in terms of their co-occurrence with negative and/or positive keywords, which can be found in Tables 12 and 13 in the Appendix. By choosing to focus specifically on the NSA and Snowden within the dataset and next to the concepts, a connection might be found. Any connection between one of the concepts and either Snowden or the NSA can constitute a certain way of framing the issue within the articles. For instance, Snowden might be brought forward more often in terms of the concept of privacy or the NSA might be more often phrased within the presence of negative wording, in either of the countries. This not shows a way of broadcasting the issue, but it could also show a difference between the two countries.

2.4   Conclusion

Discourse is a daily phenomenon. It happens all around and within us, knowingly and unknowingly. The analyzing of such discourses themselves requires the binding of the research within the context of the discourse itself, believing text can only hold meaning within it cadre and not standing on its own. As this is not the idea behind this research, a content analysis is conducted. It locates the explicit presence or absence of a concept (Carley, 1990) and counts the number of times each concept occurs within a given dataset. There is no need for context outside the dataset and its focus is only on the wording on its own. The language and the meaning are deemed scientific and not social. The contextual background is put aside and the meaning is said to be consistent, allowing for a concrete analysis. This results in a coding scheme, both based on the literature the conceptualization process brought as it is on

the articles, as to allow both scientific and day-to-day words and ideas on the concepts in the research.

The struggle of privacy, security and surveillance is present. How present it is in the newspapers of the NL and the US, as countries under investigation here, will be viewed and this will be done through a content analysis. Although perceived as being adequate for this research, it has its faults. The main problems, according to Titscher (in Kohlbacher, 2006), are in terms of inference, reliability and generalizability. However, as the main strength of such an analysis is its openness and step-by-step methodology (Kohlbacher, 2006), the issue of reliability can be restricted. The inter-code reliability sets out for a coding scheme which will be duplicated by a different coder, thus granting a reliable scheme. As the steps towards this scheme have been explained, the reasoning behind it is clear and can be brought forth by another coder. This is not to say that the threat is taken away completely, as coders in essence can perceive literature and the data differently in terms of importance and unimportance of some items and keywords. Interference is not really an issue, as the dataset consists of one big dataset of three months and does not single out specific texts. This shifts the threat of assumptions based on a single text and theory to the side. Lastly, generalizability is not the focus here. The units of analysis are the four newspapers and they do not together sufficiently represent a large population or another large sample.

The choices regarding the data and keywords within the coding scheme have been put forward. Firstly, the dataset will consist of newspaper articles found in free online archives, of the newspaper itself. The data used within this research will fall within the time period of 5th of June 2013 up until the 5th of September 2013, right after the revelations on the practices of the NSA, when debate is at the start. Plus, as to ensure that Snowden and the NSA are indeed the subject of the article, only articles that include NSA'/'National Security Agency' or 'Snowden' in the heading. Secondly, the scheme is based on the conceptualizations made in the previous chapter and a first glance of the dataset. Each hit for a keyword will indicate the presence of the specific concept under which it is placed. It is the core of the content analysis, which will be conducted in the next chapter. As the focus is not solely on the concepts but also on their relation with the NSA and Snowden, emphasis will be put on it in the content analysis. This will be done by examining the occurrence of the two subjects with the concepts and their keywords, in order to stipulate the existence of non-existence of a relationship. Furthermore, Snowden and the NSA will be judged within the dataset in terms of positive or negative wording. As the situation has conjured up a debate for either side, both Snowden and the NSA will be favored and will be hated for their actions. The question arises if either the NL or the US holds a specific place for either subject, be it negative or positive, within the dataset. This falls outside of the scope of the conceptual analysis, but is nevertheless important to form an indication and perhaps an explanation on their relationship with the concepts. This will be done in the next chapter, which is the content analysis.

3   Content analysis: the struggle between privacy, security and cybersurveillance

As the previous chapter has outlined the methodological aspects, this chapter will consists of performing the content analysis. This analysis is focused on the four mentioned newspapers, being The Volkskrant, Trouw, The Daily News and The Los Angeles Times. It will use data which is articles in the period of 5th of June 2013 up until the 5th of September 2013, which state the words (Edward) Snowden and/or NSA/National Security Agency within their heading. These articles will then be used in order to locate possible differences between the two countries in terms of privacy, security and cybersurveillance after the disclosures from Snowden. This is the focus of the research and as a content analysis will be conducted, the coding scheme provided in the previous chapter is the core of the research. As to create a clear path towards answering the question, the three concepts will be dealt with separately.

      Following the order used in the theoretical framework, privacy, security and then cybersurveillance will be assessed by their position within the data. This entails not only shortly re-explaining their conceptualization, but also connecting the analysis and the scheme with the theories at hand. Doing so will allow in-depth analysis of the concepts, as the theoretical framework is the driving force behind the research. This will result in an individual scope of the concepts and a comparison of them throughout and the differences between the results in the NL and the US. The keywords given in the results are displayed in English, for the convenience of the reader and for the ease of comparison.

      The first analysis will constitute how many hits each concept has been given throughout the time-period in terms of keywords. They will be compared by percentages, as to better assess the differences between both countries and within the concepts. This analysis is given in the form of a table and in figures, in order to see the differences in the use of keywords as a total of the whole concept. This analysis will show if there is a case of presence or absence of the explicit concepts within the data. Not only the presence of a concept can tell something about a country; the absence of any concept can be just as telling. It shows a favoring of one over the other and that is what this analysis is for. It allows a comparison between the three concepts in its full disclosure. The second analysis focuses on the occurrence of the concepts with the NSA and Snowden. This refers to the number of times any of the keywords within the concept has a hit within the same sentence as the NSA and Snowden, thus being mentioned and discussed within the same sentence in the dataset. Doing so allows, in terms of comparing the two countries, to see if either of the subjects have been brought forward more closely towards one of the concepts. The NSA or Snowden might be closely intertwined with one concept in the NL and with another in the US. This sets out a difference in terms of the phrasing around the subjects, which is important as people gather information on the debate.

      Thirdly, as to zoom in on the issue of NSA and Snowden outside the scope of the concepts, an analysis containing the most frequently used positive and negative framing on the NSA and Snowden will be conducted. Getting a clearer picture on how they are portrayed will give insight as to how their actions are most likely brought forward. Lastly, some quotations of both countries will be examined as to see firsthand how it is paraphrased in real sentences in real life. It will give the opportunity to see the phrases first hand outside of the dataset as a whole.

3.1   Privacy

Privacy can be considered as the one out of the three concepts to have taken the biggest hit, also due to the fact that it affects people on a daily basis. The public now has to contemplate on such an issue that was always just considered as a right and a factual presence. The need

for privacy exists, and did not do so until the individualization occurred after the Reformation. A concept is changed by the nature of the time in which it lives (Baghai, 2012; Solove, 2008) and any conceptualization would have been be different some decades ago. Privacy in this research is stated as: the right to control, i.e. decide upon releasing or not releasing, personal information about oneself. The main aspect of privacy in this conceptualization is the issue of control. However important it may be, it can also be considered as impossible in a world where technological developments never stop (Tavani & Moor, 2001).

The keywords given to privacy are control, individual, leak, permission, personal and privacy (for the Dutch keywords, see the scheme in the previous chapter). When observing the conceptualization, the emphasis is put on the keyword 'control'. Privacy in this technological day and age goes hand in hand with control over one's information and having the right to decide as an individual on whether or not to release it to a third party. This right is breached when information is leaked without permission, which relates to two other keywords, 'permission' and 'leak'. All together, they form the idea of what are the main aspects of privacy, i.e. individual and personal information over which one holds control and the right to give another permission on touching it. If this right is breached, it means the personal information has been leaked.

3.1.1 Privacy's keywords in the data: an individualized society?

Figures 1a and 1b represent the hits per keywords for the concept of privacy in the NL and the US. This will focus on the presence or absence of the given keywords within the dataset and will reveal which aspect within the framework of privacy is mentioned most. If one of the keywords receives the most hits, meaning it is most frequently mentioned within the data, it entails that more emphasis is put on it than on other keywords within the concept. A clear absence of any keyword would refer to the fact that the issue is not deemed important as such. All the keywords are here compared with each other and given in percentages, as to give both countries a clear comparison within the data.

Moving to the analysis itself. For both countries, the keyword 'leak' has the highest percentage of hits, followed in both cases by 'privacy'. The fact that Snowden leaked information concerning the practices of the NSA did of course rock a few boats and can be considered to be, following the results, the main issue in this concept. Permission and control

Figure 1a: Privacy hits in keywords NL   **Figure 1b: Privacy hits in keywords US**
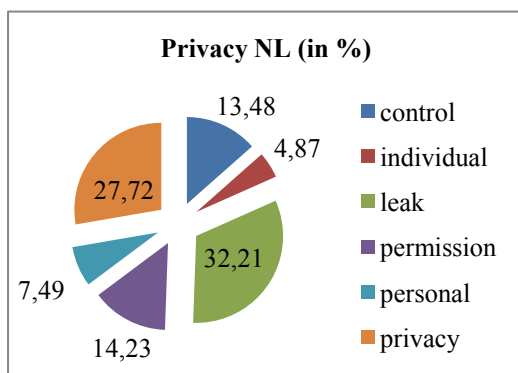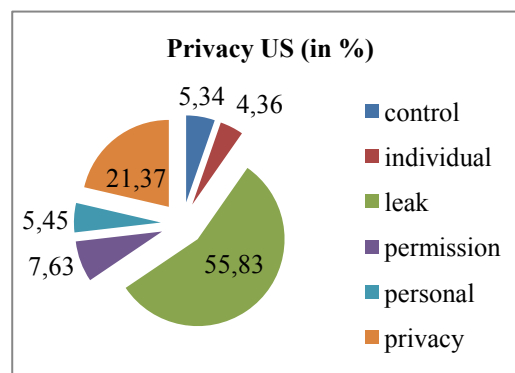
are believed to play a considerate role in this issue. Control over information and the act of having to give permission before said information can be released constitute a significant part of privacy. Thus would lead to the believe that both the keywords 'permission ' and 'control' would raise a few hits. However, in the NL, 'control' is number four out of six and number three out of six is 'permission'. For the US, 'control' is number five out of six and

'permission' is number three out of six. It would thus seem that control does not play a huge role in displaying news on the issue of the NSA in these newspapers. For both countries. Furthermore, the shift has been made towards focusing on the individual. The keyword 'individual' therefore would perhaps raise some interest. For both the NL and the US, this keyword scores last, six out of six.

As these were the main notions of privacy, one would be hesitant to believe that the issue of privacy does not concern anyone. The keyword 'privacy' places second in both countries. It is thus not the case that no emphasis is put on the concept. It could refer to the fact that privacy as a given is perceived as important as a whole and that no specific issues, regarding control for example, are highlighted in the given newspapers. It is of course noteworthy that both countries are very in line with each other on these keywords.

3.1.2   Privacy, the NSA and Snowden – an intercorrelation

Table 3 in the Appendix shows the number of times the keywords of privacy are found within the same sentence as NSA and Snowden. As the focus of the research is to view the relation between the concepts and between the concepts on the issue of the NSA and Snowden, this analysis here will focus on their presence or absence of each other. Privacy has often been said to have been breached by the NSA and to be protected by Snowden. It is therefore interesting to see if this main notion is brought back through the data as well. For if any of the two subjects comes more in contact, meaning is referred to within the same sentence, with the concept of privacy, it would lead to making a stronger connection between the subject and privacy. Therefore, this analysis will show if there is a remarkable connection between privacy and/or NSA and Snowden.

For both countries, Snowden has been mentioned more than the NSA in the concept. For the NL, Snowden has been mentioned most often in the same sentence as the keyword 'leak' and the same goes for the NSA. The fact that information has been leaked is thus most often connected within the concept of privacy. For the US, the same goes; 'leak' is most often mentioned and receives most hits in connection to Snowden. This should come as no surprise, as it also scored highest overall in the section above, on the privacy hits per keyword. The US does have a significant higher percentage on the co-occurrence of 'leak' and NSA than the NL does (80.88% to 49.25%).

In this analysis, when comparing the two countries, a significant difference is to be mentioned between the co-occurrence of 'control' and NSA in the NL and in the US. For the former this co-occurrence is much higher, thus the mentioning of control has co-occurred with the NSA more often in the NL than in the US (16.42% to 1.57%). The keywords 'individual' and 'personal' do not reflect a high score in the relationship with NSA and Snowden. 'Personal' would have been thought to make a connection with NSA for either country, as the agency did touch personal information of citizens. Lastly, 'permission' scores highest in the NL with NSA, 13.43%, where it only scores 3.76% in the US. Giving permission is deemed important within the conceptualization of privacy, thus this is noteworthy.

3.1.3 The concept of privacy within the data

Upon reviewing the analysis done in terms of privacy with its keywords and its connection with NSA and Snowden, a few striking things have surfaced. Overall, the two countries show similarities in terms of the sequence of presence of keywords. For both, 'leak' is mentioned most, followed by 'privacy', 'permission' and lastly 'individual'. Furthermore, within both countries, 'leak' has a stronger connection with Snowden than with the NSA, although connections are high with the NSA in both as well. In both, Snowden is mentioned more than the NSA. The similarities between the two countries show that the issue of privacy has

surfaced in somewhat the same terms, putting emphasis on 'leak' and 'privacy' and not at all on 'individual' or 'personal'. Giving the conceptualization, this is somewhat surprising. As the focus has shifted towards the individual and his rights, one would reasonable assume that the right to privacy would have been portrayed towards the individualistic notion within the dataset. As this has not been the case in either of the countries, it is clear that the focus is in fact on the breach of the right, thus towards 'leak'.

This is not to say that there are no differences between the countries. One main differences coming from these two analyses on privacy is that, although highest in both countries, 'leak' between the two has a significant difference. In the NL, 'leak' consists of 32.21% of the mentioning of privacy, whereas this is 55.83% in the US. Number two for both countries is 'privacy' and this is very in line in both countries with around the 25%. However, number three 'permission' is 14.23% for the NL and 7.63% for the US. The differences between the percentages in the US are much higher than in the NL, where the percentages are more closely aligned. The same holds true when introducing the NSA and Snowden into the mix; much higher differences for the US than for the NL. As if the US either highlights something significant, or not at all and the NL spreads its focus.

Lastly, there is the issue of 'control'. Perceived in the theoretical framework as something mentionable, the results beg to differ. In both countries, 'control' is one of the last mentioned keywords and does not hold a strong connection with either Snowden or the NSA. However, the connection between 'control' and the NSA is much stronger in the NL than in the US, 16.42% to 1.57%, but still weak in internal comparison. Whereas control over information (Leino-Kilpi, Välmäki et all. 2001) is seen as the essence of privacy itself, it is also seen as necessary to breach in terms of the greater good (Westin 2003), thus emphasizing the security of all before the privacy of the one. So as correctly stated by Tavani and Moor (2001), control and privacy are to be treated separately. As we cannot control all the information which is out in the open about us in the days of globalization and technology, it is necessary to have either privacy or either control, but both is simply not feasible. This is of course not to say that any private information over which no control is possible is not private on its own.

3.2   Security

Security is a highly valued idea. Valued by individuals, families, states; different kind of actors all wish to feel safe and secure (Baldwin, 1997). Whereas the main focus of the government used to be on keeping the state as a territory safe, the focus has shifted towards the internal security of the state. Keeping the individuals within the state safe has become the main issue. However, this is of course a very big ordeal, as there are many aspects of an individual's security, as depicted by (Paris, 2001): security of poverty or starvation and more or less any minor threat. When conceptualizing security next to cybersurveillance, the issue of terrorism plays a significant role, as the underlying threat and start of the problem itself. The sheer fear of terrorism and terrorist attacks after 9/11 have resulted in the current policy choosing of the government concerning privacy, security and cybersurveillance. President Bush made fighting terrorism and ensuring security against these threats the main focus of the US' policy making and this fight has certainly found its way into the office of President Obama (Leffler, 2011).

Miller (2001) draws attention to the fact that an individual is to be perceived as secure when he is capable of defending itself. When viewing the terrorists as the major threat to one's safety, the government has the capabilities to defend its public. This has been proven by the massive foreign invasions, most of all done by the US government. The US declared war on terrorism and outsourced its means to attack the core, being the Taliban in Afghanistan. Global terrorism was the threat and it was to be exterminated. However, coming back to

Miller's statement, what if the actor holding the responsibility to protect you is the actor that poses the threat? Sure, the threat to one's security can be depicted as terrorism. But when drawing this line a bit further to the fact it has been shown that people that are claimed to act 'dangerous' can be monitored and treated as a threat, how are they safe? How are they to have the capabilities to defend themselves from the actor that is supposed to issue the protection? People want to be physical safe from violence and this is done through the use of cybersurveillance, as that is how the government perceives safety being reached. Zedner (2003) puts emphasis on the legislation here and politics as means to put the public's mind at ease. However, as Cameron has shown (Grice, 2014) by issuing emergency laws on very extensive surveillance without consent of those citizens suffering from an apparent lack of privacy, this is no reliant factor from which to draw any sense of security, let alone privacy. Security, as conceptualized is: physical protection from the violence of terroristic acts, issued by the state. This entails public, and not private, security, as the government is a major actor in the issue of the NSA. The given keywords within the scheme are fear, physical, protection, security, terrorism and violence (for the Dutch keywords, see the scheme in the previous chapter). Nearly all keywords are mentioned within the conceptualization, except fear. As the driving force behind security is to reduce fear and security is needed when fear is perceived, it is deemed as appropriate to adhere it into the conceptualization.

3.2.1   Security's keywords in the data: terrorism new focus?

Figures 2a and 2b state the hits per keyword for the concept of security, in both countries. As has been done with privacy and will be done for cybersurveillance, this will entail as to the level of appearance or non-appearance of the keywords. An emphasis put on any of the keywords in the theoretical framework will be judged accordingly. This will help stipulate the debate on the issue. If the conceptualization is followed and the emphasizes are fitting, the keywords 'terrorism' and 'violence' and expected to strike most hits. As the first is the threat and the second is the fear, they are believed to be mentioned most within the dataset.

However, as seen in Figures 2a and 2b, within this concept the keyword 'security' is the most frequent flyer for both countries. Note that, as can been seen in the elaborated scheme in the Appendix, secure, safe and so on are taken in this keyword. Thus being secure and safe are taken within consideration and are mentioned throughout the data. Even the

Figure 2a: Security hits in keywords NL
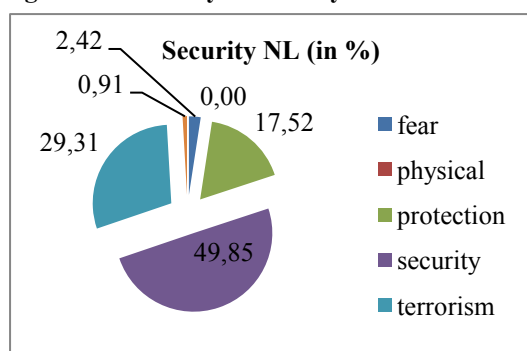
Figure 2b: Security hits in keywords US
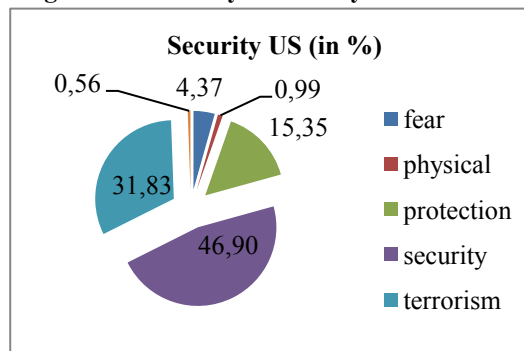
percentages of both countries are more or less in line, with both pending around the 48%. Secondly, 'terrorism'. Although assumed to be the most frequent one, it is second in both countries. Here, again, the percentages between the countries are very similar. 'Terrorism' is mentioned often and can therefore be seen as an important factor within the concept of security. It is followed, in both the NL and the US, by 'protection', where yet again both show very similar percentages.

'Fear', 'physical' and 'violence' are, following their very low percentages, no real presences within the data. 'Physical' for that matter is not even mentioned once in the NL. As taken from the conceptualization, they are considered to play a role when contemplating on security. People fear terrorism. It is the threat against which the government is fighting. However, perhaps violence itself is not feared. The core fear here is terrorism, as it has been mentioned so frequently. However, there is the very distinct possibility that the public fears others ways of retaliating. Although violence and massive fear was for instance used in Munich in 1972, New York in 2001 and London in 2005 when these cities faced terroristic attacks, it is reasonable to believe that the threat is now digital. Digital attacks occur when computers are hacked and information is spilled and perhaps those are the more omniscient fears today.

3.2.2   Security, the NSA and Snowden – an intercorrelation

Table 4 in the Appendix shows the number of times the keywords of security are found within the same sentence as the NSA and Snowden. As security is the main focus of the government and the NSA, it is to be expected that the NSA and 'security' will be found within the same sentence quite often, as it is built on the foundation of security.

The first noticeable thing here is of course that the NSA often does not hit a keyword at all in the NL. As this is the case for the lowest mentioned keywords, this is hardly surprising. It does however put more emphasis on the fact that Snowden is mentioned with those keywords, being 'fear' and 'violence'. However, as these scores are so low, it is not sufficient to draw clear conclusions from it. When comparing it to the US on the other hand, it is shown that 'fear' and 'physical' are mentioned with both Snowden and the NSA. Both score low again here as well.

In both countries, the sequence of the keywords is equal; 'security', 'protection', 'terrorism', 'fear' and 'violence'. When comparing Snowden in both countries, the NL shows more lenience towards 'security' with 71.11% to 60.37%, but both remain around 20% with 'protection'. Here again, shared characteristics are to be found. However, moving to 'terrorism' does show a small difference, as it is mentioned more frequent in the US than in the NL for Snowden. This same difference is found for the case of the NSA, as it is mentioned more in the US. The US has already shown in the previous analysis that is has higher scores for terrorism and this has been found here again. Even though the difference is small, it is a significant difference when compared to 'security'. The latter is mentioned far less than 'terrorism' in the US and the difference between these two keywords is minimal in the NL. This does make a case for the US putting much more emphasis on terrorism than security when contemplating NSA. It could refer to the newspapers putting terrorism under heavy attention, as to counterbalance the existence of the NSA. However, this would let to believe there would also be reference towards security, which is much smaller.

3.2.3 The concept of security within the data

The data given through the analysis of the concept of security shows some similarities and some differences. Overall, the two countries follow the trend set out by privacy, as they tend to walk the same path in terms of using their keywords in the first analysis. 'Security' is most mentioned, followed by 'terrorism' and 'protection', where even the percentages are very similar. Furthermore, in both countries 'fear', 'physical' and 'violence' are not a real presence. This could lead to the idea of a different source of fear. Although terrorism is the driving fear, as the data indicates, violence is not the feared means. It might have been in the past, as very violent terroristic acts have occurred, but this is no longer the issue. It could perhaps be that, as emphasized in Shreeve's article in *The Independent* (2006), that the threat is digitalized as well. The terrorists have moved from the physical and bodily harm and might enter the technological realm to inflict harm. Although the aim behind it is still to kill and initiate disasters, the means to do so have become intensively technological and might shift

focus. The attacks could be aimed at data processes (ibid). It might therefore be that the data reveals low-level 'physical', 'violence' and 'fear' due to the fact that the threat has gone digital. It cannot be perceived and perhaps this is what is to be feared. This has also been brought forward when contemplating on security when shifting the focus on the NSA and Snowden.

However, a difference is to be mentioned in the latter analysis on security. 'Terrorism' has been mentioned more often with the NSA and Snowden in the US than in the NL. Especially when 'security' is mentioned less than 'terrorism' in both countries, but the difference between the two keywords is significantly greater in the US than in the NL. The US thus puts more focus on terrorism than on security when discussing the subjects of the NSA. Reversely, 'security' is far higher for Snowden than 'terrorism', letting to believe Snowden is far less associated with terrorism than the NSA.

3.3 Cybersurveillance

This concept can be considered to be the whole problem. Although this is a technical and more modern concept, surveillance has of course been around for decades. Starting with Foucault's perception which saw characteristics that could be put into power within a situation where there is a need to control subordinates, the technological aspects are to be added to make this concept work today. He did so by starting from the work of Bentham, who described a prison he envisioned as highly efficient. Lyon (1994) mentioned, with respect to the relation of the guards over the prisoners, control, one-way gaze, gathering and saving information and uncertainty of the actual surveillance as the main notions and key issue. This was drawn into the possibility of a government residing over its public in such a fashion. This would change society in one in which the few control the many (Mathiesen, 1997). Creating the government as an omniscient creature to place the burden of surveillance over its public in order to keep them in line and out of harm's way. However it may be, cybersurveillance did not become a concrete problem as it is now until people found out due to Snowden's sharing. The contemplating between values thus begun. It was at that point that the greater public became aware of the grave breach and was forced to choose between the value of security and the value of privacy, or at least think on the issue.

People can, to some extent, fight back against the decisions made by the government, who would not be there without their support to begin with. They have the right to strike, to demonstrate and protest, in most countries that is. Bentham's prisoners could not fight back, as all their rights were stripped when they entered the prison. It would be reassuring to not have to see a claimed democratic society as such, but it is hard not to. Fighting back against the cybersurveillant actions is rather difficult. Only the tip of the iceberg has surfaced and if even the legislative powers do their best to keep the rest of the iceberg under, there is not a lot to do about it.

Cybersurveillance has been conceptualized, from surveillance onwards, as: the collection and storage of personal data by the government, gathered by monitoring, knowing or unknowing, individuals. The keywords are cyber, monitor, spy, storage, surveillance and technology (for the Dutch keywords, see the scheme in the previous chapter). Cyber and surveillance are taken separately as cybersurveillance is not that perceived as a concept on its own within the dataset. Plus, if taken apart, they can be looked at individually and the technological aspect can be viewed. This will also be done through the keyword technology of course. These keywords show the main aspects of the Panoptic society, but the uncertainty is not displayed. This is due to the fact that this has been taken away to some extent due to the actions of Snowden by his revelations. Of course, people do not know all to the full extent, but the act of monitoring is known to be out there.

3.3.1 Cybersurveillance's keywords in the data: technological advances?

Figures 3a and 3b constitute the hits per keywords for the concept cybersurveillance in the NL and the US. This is the final concept to be analyzed in terms of keywords found within the dataset. It has been done for privacy and security and following this analysis, the focus will shift towards the issue of the NSA and Snowden in another domain.

Figures 3a and 3b reflect the findings of the keywords from this concept within the dataset of both countries. Differences within the concept between the countries are found

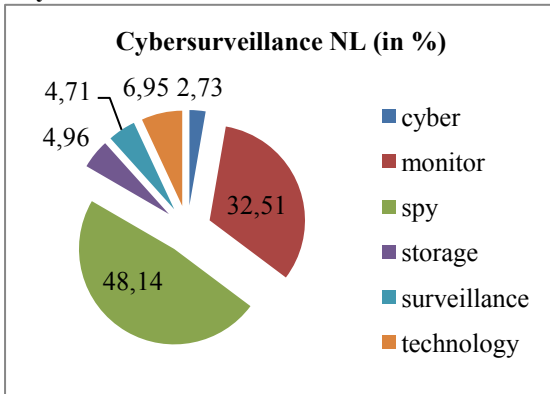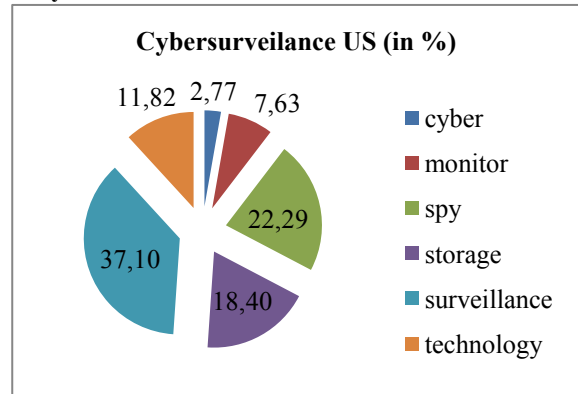**Figure 3a: Cybersurveillance hits in keywords NL**

Figure 3b: Cybersurveillance hits in keywords US

here more clearly, unlike within the previous two concepts. For with privacy and security, the sequence of the keywords overlapped significantly within both countries. This is not the case here. For the NL, the most frequent used keyword is 'spy', followed by 'monitor. These leave a huge gap between number three, which only has a small percentage of 6.95%, namely 'technology'. For the US, the most frequently mentioned keyword is 'surveillance', followed by 'spy' and 'storage'. Although differences between the percentages of the US are there, they are much smaller than for the NL. Given the differences in sequence here, it seems that cybersurveillance is the issue which constitutes a debate here. The NL has more hits on the spying and monitoring, thus on the fact that someone is watching. The US has more hits on surveillance, but not on its implications of monitoring as such. Furthermore, in terms of differences between the percentages within the countries. It is clear that the NL has a more centered preference, where the US is more on shifting between the keywords. The US hits relatively high on all keywords, when considering that the NL has four keywords under the 10% and the US only 2. This is the opposite of what was going on for privacy, where the US seemed to focus only on two major keywords and the NL choose to differentiate.

Following the conceptualization and the theoretical framework, it was to be expected that the emphasis would lie upon the technological aspect of the concept, as we live in a technical era. Although discussed about as being a positive spin for society and a means to keep society efficient and in line (Lyon 2003), it does raise questions regarding its implications. The keywords 'cyber' and 'technology' both do not score considerably within both countries, although the latter scores higher in the US. 'Spy' on the other hand scores higher, which would entail that it is not the technological aspect of the whole matter that is issued most in the dataset. It is more on the notion of monitoring and spying than on the fact that the surveillance has been raised to a new level in terms of technology. It is the intrusive nature that is most discussed.

3.3.2 Cybersurveillance, the NSA and Snowden – an intercorrelation

Table 5 in the Appendix shows the number of times the keywords of cybersurveillance are found within the same sentence as NSA and Snowden in the dataset. The main expectation

here is that, following the conceptualization, the emphasis is put on 'technology' and 'cyber'. However, as has been shown in the prior analysis of this concept, it can also be on the issue of surveillance and spying. As both countries showed similarities for the aforementioned concepts, they do not continue this path here. It follows of course from the logic of the previous analysis that some keywords are mentioned more than others, thus no real surprises in terms of sequence will be found here.

However, a difference between the countries is noticed when closing in on 'spy' and 'surveillance'. Both keywords show remarkable differences throughout their occurrence with the NSA and with Snowden. 'Spy' is mentioned far more in the NL, that much was established. It is shown here that 'spy' occurs far more with the NSA and with Snowden in the NL than in the US. Both Snowden and the NSA show similar percentages in the NL, but 'spy' and Snowden is mentioned far more often than the with NSA in the US. So, both subjects are closely and more greatly connected to 'spy' in the NL and Snowden is brought more in contact with 'spy'. This leads to the idea that the US is more incline to stipulate Snowden in terms of spying than the NSA, which is remarkable. This due to the fact that it is the NSA who has done the spying and Snowden is simply the messenger. However, the debate on whether or not Snowden can be considered a hero or not is still open. Where for the NL, no clear preference is to be found in these terms.

The US has fare more connections between 'surveillance' with both the NSA and with Snowden than the NL. The differences between the countries on this keyword are quite large. This could be due to the fact that 'surveillance' is an American term and has not yet been manifested quite sufficiently enough in the NL. However, no clear substitute has been found in the data, unless 'monitor' is examined. For it is the NL who scores much higher. It can be concluded that both countries do in fact focus on either surveillance or monitoring, but the differences between mentioning either are found between the countries. Lastly, as was expected from the theoretical framework, the technological aspects of the concept within the dataset. Thereby referring to 'cyber', 'storage' and 'technology', either one of those are expected to conjure up connections. This is however not the case in the expected severance.

The NL shows no connection with 'cyber' at all and a low one with 'technology' and 'storage', without noteworthy differences between NSA and Snowden. The US scores low with 'cyber' and 'technology', but scores significantly higher with 'storage' and scores overall higher than the NL. This leads to believe that the US places more emphasis on the technological side of surveillance and even more so connecting to the NSA, thus referring to the fact that the agency stores information.

3.3.3 The concept of cybersurveillance within the data

More differences between the countries are found within this concept and a shift from the conceptualization has been made. Where surveillance surfaced and passed on its main characteristics in order to create cybersurveillance, it has not done so in the dataset as was expected. The omniscient one-way gaze ordering discipline over docile bodies (Shawki 2009) is what constitutes surveillance and in turn is what constitutes cybersurveillance. The collecting and storing of information without consent. This is what Foucault foretold and this is how cybersurveillance was measured, but technological aspects were added. What was expected is that the data would have reacted on the changing set of the society. One in which technology was adored and feared, as people did not know how to implement this into their mindset in terms of the two-faced role of the government.

It is perhaps how Lyon (2003) stated it. Although these devices to control the population are there, they cannot be perceived as the problem at hand. Surveillance is not the root of the problem, nor some negative condition of today. It can in turn help to create efficiency and do good. It is not until it meets privacy that it shows its negative side. This is what the data entails. For both countries, the technological aspects are greatly snowed under

by 'surveillance', 'monitor' and 'spy'. It is the invasive aspect of the concept itself that demands attention throughout and this is the case for both countries, although they differ to some extent as the reference to a subject. The US more often refers Snowden and 'spy' within the same sentence than the NSA, and the NL has no real differences between these two subjects for 'spy'. Moreover, whereas the US favors 'surveillance' above all, the NL tends to shift to 'monitor'. This might refer to the US putting more meaning within surveillance, as to incorporate all acts of surveillance within its meaning. The NL on the other hand might choose not to do so, as the term might not be as applicable.

3.4   The framing of Snowden and NSA: positive or negative?

In order to specify on how the NSA affair with Edward Snowden was brought forward, it is necessary to look beyond the concepts stipulated above, as they are not able to draw a positive or negative line between a keyword and the subject. Even though the NSA and 'storage' for example are often mentioned in the US, it does not say anything about any positive or negative connection. It is admitting the existence of any kind of relation between the two, but not its nature. To do so would require positive and negative phrasing and searching within the dataset. This has been done and can be viewed in Tables 6 and 7 in the Appendix. Before moving to these tables, it must be mentioned that the number of positive and negative wordings is not evenly distributed: there are six positive and eight negative words. These words are found in the word crunchers and are believed to be the ones best adequate to be used within this part of the analysis for the reason that they are the most frequently used in writing and in real-life and they don't lie on the edge between positive or negative wording. For instance, the word 'traitor' is clear. It holds a negative relation, in the sense that the existing relation is based on negative wordings towards the subject, be it Snowden or NSA.

Now turning the attention to the tables. Starting with the NL. Firstly referring to a main issue is whether or not to portray Snowden as a hero. Within this country, Snowden is most often put in the same sentence with 'traitor' and this has been done significantly more than with 'hero', 51.16% to 26.53%. As this is not applicable for the NSA, 'legal' and 'illegal' will be looked at. 'Legal' scores 23.08% and 'illegal' 13.33%. This were to be expected when Snowden is more often brought forward with 'traitor', that the NSA scores higher on 'legal', thus favoring the actions of the NSA within the NL. Furthermore, the NSA scores much higher on 'civil right' and less on 'crime' than Snowden does. To compensate, Snowden scores lower on 'abuse', 'intrusion' and 'violation'. It would seem that no clear preference is given here, as both score high and low and differ accordingly. Lastly, 'crime' has a greater connection with Snowden than with the NSA.

The US, Snowden is more frequently associated with 'traitor' than with 'hero', but the difference is not that great. The NSA is more often associated with 'legal' than with 'illegal' and with a significant difference; 42.86% to 1.49%. This is very surprising at heart, but not when contemplating on the fact that the NSA is also more connected than Snowden to 'freedom'. However, 'crime' holds no favorite, as the numbers between the two subjects here are more or less the same. The US does tend to favor the NSA more within this analysis. When comparing the two countries, it seems that some negative words are not often used in any country and that the spreading of them all is more present in the US than in the NL. It would seem that the NL has a preference towards using 'traitor' and 'crime' more, which are relatively harsh words to describe the situation. Whereas the US does not hold a clear preference for any negative term. The same constitutes for the positive wording, but to a lesser extent.

The following part of the analysis will focus on 'violation'. As Tables 6 and 7 show, there is a noticeable difference between the two countries concerning the number of occurrences with either subject. Due to the fact that this research is not only on how the

concepts are brought about but also on the NSA-affair, it is worth looking into what the NSA and Snowden are believed to be most in connection in terms of violations. It has been shown here that there are differences between the countries in terms of 'hero' or 'traitor' and it is worth looking into the main issues either subject is to be in contact with in terms of their wrong-doing. This in order to not only examine that the dataset sees them as either, but to also stipulate on the precise direction.

3.5   Quotations of NSA and Snowden

As can be seen in Tables 6 and 7, 'violation' does concur up some co-occurrence in both countries, be it a bit dodgy for the NL. As 'violation' is best explained in combination with the act of the violation itself and this is what this part of the analysis will focus on. The reason is to unravel what the NSA and Snowden are being "accused of" within the dataset, or better said, put into contact with within the same sentence. This connection which is made within the same sentence can frame a reader's mind on the issue and is thus of importance. Tables 8 and 9 are part of this piece of the analysis, where 8 is on the NL and 9 on the NL. The notion of comparing the countries in terms of the concepts is put aside here, as the focus now lies on how the NSA and Snowden are brought forward more concretely within the dataset. For both countries the top three, in terms of density of number of hits of words within the Appendix, quotations are given. However, for the NL in Table 8 only two are given, as the dataset did not contain more than this.

Table 9 on the US shows some similarities between Snowden and the NSA. They share two out of the three quotations. Both quotations differ in terms of choosing sides. The first quotation, with ten codes, tends to take sides with Snowden as it puts emphasis on the violating nature of the NSA and his heroism. This quotations hits some contradicting codes, as 'crime' and 'hero' and hits both the NSA and Snowden. The second quotation with seven codes takes side with the government as it is on the violating act of breaking the law, done so by Snowden who is to undergo trial and serve his time. This quotations does not stipulate contradicting codes, as it is rather negative in its nature of putting emphasis on the damage Snowden has made by his actions. It only connects the NSA within it by connecting Snowden as its employer. The codes which received hits here are rather contradictory by nature. There is no clear right or wrong here, but the negative and positive terms are used throughout the sentences. This makes these quotations rather neutral, as they do not favor either subject clearly over the other. They do tend to state both Snowden and the NSA within the same sentence, as if to list as many possible facts and arguments on either side on the situation. For instance, "on criminal charges brought after his massive leaks" and "violated constitutional" fall within the same sentence. It is as if all sides need to be mentioned and no clear indication is given as to take a stance.

Table 8 is on the NL. As said above Snowden and 'violation' only has two quotations, which in its own says something. Snowden is not brought in one sentence as violation that often in the NL. However, when he is, the dataset is sort of reliant. One quotation says he has not hurt a single soul by his actions and the other comments on the fact that privacy of Americans was violated and that he was the one to make this public. The codes for both quotations are relatively small in number when compared to the US, who has much more per quotation. Unlike the US, the NL does not bring Snowden and NSA often in the same sentence. As can be seen in Table 9, Snowden and the NSA share all quotations but one. This is not the case for the dataset of the NL, which obviously chooses to focus on one actor in a sentence. Moving on to the NSA and 'violation', three quotations are given and these also are relatively small in number of codes when compared to the US and once again do not have both the NSA and Snowden in the same sentence. Two out of the three quotations do not favor the NSA and choose to direct attention towards the violation of data and law and

premises of the law. The one being more friendly towards the NSA is quite neutral on the matter and only deals with an announcement on the matter at hand. The quotations given here do take a stance more than those in the US. In terms of codes, 'control' is mentioned next to 'violation' with the NSA, as the focus is mostly put on it for the NL. This was not the case for the US, whose codes tend to fly all over next to 'violation'.

This part does fly off the handle in terms of its lack of connection with the theoretical framework. The conceptualization and keywords chosen prior to the analysis do not hold merit within this portion. The reason for this decision is to shortly side-track on the issue and put some focus on the affair at hand in order to clarify the direction of the dataset on both subjects. It would seem that both countries' datasets tend to stand behind Snowden here, although the NL is more noteworthy in this matter. Both mention the grove violations of privacy, both the US tends to put both the NSA and Snowden within the same sentence and throw around with the codes assigned in this research. Of course it is clear to see that the quotations coming from the US are far longer than the ones from the NL which obviously would explain the lower number of codes per quotation in the NL.

3.6   Conclusion

Having conducted the content analysis, a short summary is in order before moving on to the answering of the research question in the next chapter. Privacy, security and cybersurveillance are the cornerstones of the research and Snowden and the NSA are the parameters in which the data exists. The three concepts have been examined within this data and also in specific terms with the subjects, being Snowden and the NSA. The Netherlands show differences between the concepts, where privacy is clustered in terms of keywords, whereas security shows a distinct preference for 'security' and 'terrorism' and cybersurveillance on both 'spy' and monitor'. The NL places Snowden more often with 'traitor' in the same sentence than hero and puts 'legal' more together with the NSA than 'illegal'. However, looking at other words such as 'intrusion' and 'crime' for both subjects, the NL shows no clear preference.

Moving to the US. Here, privacy is not scattered like it is in the NL. A clear preference is given to 'leak', constituting half of the hits of the concept in total, indicating that the newspapers clearly emphasize the leak and thus a breach in privacy. Security looks similar to the NL, where 'security' and 'terrorism' are the most often hit keywords. Whereas cybersurveillance in the NL showed a clear lean to 'leak', it does not do so in the US. Here, it shows a scattering pattern, as no clear keyword comes forward. Lastly in the US, like in the NL, Snowden is put more in connection with 'traitor' than hero. However, with a small difference between the two words within the US. The NSA is more associated with 'legal' than with 'illegal'. Comparing the two countries shows similarities in terms of security, but differences in privacy and cybersurveillance. The NL puts Snowden forward far more as a traitor than a hero and the difference between the two words is far greater than in the US.

4   Conclusion

This research has begun by introducing the topic at heart. It is the ongoing struggle between privacy, security and cybersurveillance which has really surfaced when Snowden revealed man classified governmental documents of the practices of the NSA. The agency was deeply involved at many personal lives, as it had the technological means to back it up. This has led to a pondering manifestation of the technological development today's society is nestled in. On the one hand, people rightfully declared it an outrage as it hampered directly into their privacy. No authority was given by the persons under question. However, the government could outline their justifications through a judicial fallback in stating that actions were approved by law. It is however clear that the government has security at the top of their list and wishes to obey to their own preference more than to the public's, which is privacy. To maintain this security, cybersurveillance was put into place. Through careful technological monitoring and spying on the public, a secure public would be within reach. This has led the research to clearly conceptualize the concepts, as to catch their current definition and use this as a step towards the content analysis, which has been conducted in the previous chapter.

All this has been done to be able to view the articles of the US and the NL and compare them based on the three concepts which are struggling to co-exist, being privacy, security and cybersurveillance. Yes, differences have been found. However, not in the expected corners and not in the expected manner. The Netherlands has a spread interest in the keywords of privacy and a clustered spread of percentages for security and cybersurveillance. There is no clear preference of a keyword in privacy, but for security, this is clearly 'security' and for cybersurveillance this is 'monitor' and 'spy'. For the US, attention in the last concept is very spread, with a preference towards 'surveillance'. With security, it is 'security' which is mentioned most and for privacy, which is scattered for the NL, heavy attention is given to 'leak'. Plus, as is seen later on, the connection with 'leak' and Snowden or the NSA is relatively equal. Overall, there are no shocking differences between the two countries. There is a high difference when comparing the US, where 'traitor' and 'hero' are somewhat equal, with the NL, where the difference between these codes is very high. In terms of concepts, although attention is brought about different in terms of keywords, there is no significant difference. It is clear that both countries choose to focus more on the fact that cybersurveillance is present and is monitoring/spying than on the issue of privacy and security throughout and that the NL see Snowden as a traitor more than the US does, which is surprising given the fact that Snowden revealed classified governmental documents from the US to the world.

4.1   Privacy, cybersurveillance and Snowden

When looking at the results given by the content analysis, a few things raise some attention. Firstly, the issue of control within privacy. As it has been mentioned in the conceptualization as an important factor within the concept of privacy, the results show otherwise. In both countries, 'control' is one of the last mentioned keywords. This emphasis on privacy was already a debated issue, as Leino-Kilpi, Välmäki et all. (2001) and Westin (2003) clearly favored the in bringing of the concept within the conceptualization. Leino-Kilpi, Välmäki et all. (2001) see privacy as breached when there is no consent given on the sharing of information. This can be traced back to 'permission' with the analysis. However, no clear indication towards this keyword is given for both countries. A clear preference is given to the concept of cybersurveillance in both countries and more specifically, towards surveillance and monitoring. It is thus the fact that people are being spied upon that is brought most forward in the dataset. The fact that the government listens in is what is most upsetting. Following

Westin (2003) and his attention towards the political level of privacy on the relationship between the state and the individual. Although his definition of privacy stipulates the own decision upon sharing or not sharing information, he does see the politics as just when discussing crimes that may harm the public. However, he also notes the difficulty in finding a correct balance in weighing today's society and its safety and being faced with the sociality of technology and great threats. Or, another explanation is that the public simply does not care (Solove, 2008). These results indicate that there is no real broadcasting about the issue of privacy and this may be due to the fact that there is no truly panicked public. Sure, this issue has been given a lot of attention, but we also live in an era where it is normal to hand-out detailed personal information and we all do it at the drop of a hat (ibid).

The fact that no clear difference between the countries is found can be explained by Altman (1976) who defends the notion and influence of culture within this concepts. Although there is a universal value of privacy, as it is valued globally and deemed important accordingly, it is reliant on culture. There are differences between cultures and if terms such as privacy manifest themselves within said cultures, the result is that the main focus of privacy alters between cultures. This could to some extent explain why there were some, but not great differences between the two countries. Both countries have Western cultures, as far as one can of course speak of one culture within a country. It is therefore no surprise that they follow the same trend in terms of privacy, as they are most likely to uphold the same values within their culture. However, as his article is somewhat ancient, there is the question of applicability in a globalizing world. That is not to say his view holds no merit, but cultures are becoming more difficult to pinpoint as they tend to overlap and influence each other. Thus, privacy in cultures around the world have more in common than meets the eye.

Secondly, the technological aspect of cybersurveillance. The conceptualization has been drawn from Foucault onwards as to put more weight on the technological aspect today's surveillance has. Both countries show no clear indication towards this notion, as they lean towards surveillance and monitor within this concept. Take this together with the low results of privacy and it would seem that although the issue is receiving attention, it is not being portrayed in the media as such an issue. It is perhaps just present, as Lyon (2003) stated. Social sorting is part of society today and it is simply how the government is working. The fact is that this is not necessarily a bad thing, as it keeps efficiency within society in check and it is the technological development which made the government function accordingly, according to Lyon (1998). This could have been the case, were it not for the fact that next to monitoring, spy was also heavily hit for both countries. While the former can refer to the actions of the NSA in a neutral fashion, spy cannot. It is clear that the actions condoned by the NSA received attention in the form of labeling their actions as a breach and not as Lyon portrays it. It is not the case that the government can obtain information willy-nilly for the greater good. No. The data might not show a clear indication towards privacy in this matter, but it does show that the surveillance is not approved per se.

Thirdly, there was a significant difference found between the labeling Snowden as either a hero or a traitor. The Netherlands clearly not only saw Snowden as a bigger traitor than the US, it left no mistake in it by referring to him as a hero far less. As Snowden revealed sensitive information on the US government, it is surprising that the NL takes such a much harsher stance towards him. The US did not show a clear preference towards labeling him as either a traitor or a hero. Within the conceptualization of this research, no clear explanation behind this difference can be found. In terms of the data, it is perhaps possible that the newspapers in the NL put a more personal and own opinion within the article itself. Some journalists may approve and others may disapprove and do more so than in the US and they have chosen to let their personal opinion run through the story.

4.2   Practical implications

Any research is done with in the back of the mind the issue of passing on the information along. As people might favor privacy, it is clear in the results that important aspects of the concept itself, such as control and permission, are not as present as expected. Spy, monitor and surveillance on the other hand was, leading to the assumption that the fact that people are being put under a microscope is an issue nonetheless. Perhaps it is true that in an ever-globalizing and ever-technological world the notion of privacy shifts. Perhaps, as cultures overlap due to the non-existence of borders, privacy cannot be guaranteed and certainly not be controlled. This does not take away that cybersurveillance receives most attention of all the concepts. It is a topic on its own. There have been breaches of privacy and although the government claims to have followed the judicial system by hiding under terroristic laws, the data does suggest that the NSA has violated the constitution. Governments are easy with stating that they have issued an emergency law and then choose to hide behind the curtains of the court. Whatever happened to a clear transparent working legal system in which governments were to defend their actions to their voters and all concerned in the country?

Therefore, this might help politicians see that the public is not stupid, but ignorant. The public is unaware of the situation and have no clear understanding of the implications of handing over information through technological devices (Steentjes, 2014). Public understanding of privacy and cybersurveillance is needed. The fact that the issue of control was not present at the expected level could be a consequence of a lack of control. It is next to impossible to maintain control over one's private and personal information (Tavani & Moor, 2001) and people seem to care less and less by their distributing of information with the ease of a click (Sterner, 2014). Perhaps people do not care because they do not know to the full extent what the NSA and other agencies are capable of doing. They can manage acquired data in such as to pinpoint a person's whereabouts for a whole day and see with whom and when they communicated (Schneier, 2014b). This is not to say that the public is free in all of this. They need to know what is happening with their information and not hand it out like it is nothing on a regular basis. This entails being safe when you are online (Steentjes, 2014).

On a European basis, this entails raising public awareness of the situation. Make citizens aware of what happens when one is hands out information voluntarily. What happens after the simple click of the button is much more invasive than one could imagine (Schneier, 2014b). However, knowing what is happening only worsens the situation if not accompanied by a political change. The ignorance of the public can be traced back to agencies such as the NSA as they are closed off to the citizens. Schneier (2014a) calls for separation of powers of surveillance all together, as the NSA is simply too powerful. Steentjes (2014) proposes cyber-agencies who can, on a regional level, perform threat. This would result in a close-to-the-citizens agency which has to revolve around transparency and accountability.

Such awareness and such an agency can be best put forward by Europol. This agency has the task of, among others, fighting terrorism through easing cooperation between the Member States and exchanging information. It can best take up this intergovernmental task of implementing low-level agencies per Member State, not on the European Union as a whole, as it has knowledge of the Member States and its flows of information. It can start up these agencies and later on monitor and support them. This would be the administrative side to the technological aspects. The latter needs to be concretely implemented regional. In so doing, the Member State itself is actively involved in setting up this agency. When combined with a public campaign on the reasons for setting up such an agency and their vulnerability when handing over information hampering their privacy, public awareness and therefore public involvement will improve, being a perquisite in order to increase accountability and openness of the whole situation at hand.

However, this approach calls for close cooperation and trust between different levels within the Member State and then between the different Member States. It all boils down to trusting those around you. No one trusts the other and this might be a reasonable and sensible way to live by nowadays. However, doing so might destroy society as working together is what makes us a society.

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Table 3: Privacy co-occurrence with NSA and Snowden

	privacy							
	NL				US			
	NSA		Snowden		NSA		Snowden	
keyword	quotation (#)	%	quotation (#)	%	quotation (#)	%	quotation (#)	%
control	11	16,42	3	4,11	5	1,57	17	3,70
individual	1	1,49	n/a	n/a	2	0,63	5	1,09
leak	33	49,25	47	64,38	258	80,88	362	78,70
permission	9	13,43	4	5,48	12	3,76	15	3,26
personal	1	1,49	6	8,22	4	1,25	16	3,48
privacy	12	17,91	13	17,81	38	11,91	45	9,78
total	67	100	73	100	319	100	460	100

Table 4: Security co-occurrence with NSA and Snowden

	security							
	NL				US			
	NSA		Snowden		NSA		Snowden	
keyword	quotation (#)	%	quotation (#)	%	quotation (#)	%	quotation (#)	%
fear	n/a	n/a	3	3,33 **4**	3	2,44	9	5,49
physical	n/a	n/a	n/a	n/a	2	1,63	3	1,83
protection	4	5,80 **3**	17	18,89 **2**	19	15,45	35	21,34
security	33	47,83 **1**	64	71,11 **1**	32	26,02	99	60,37
terrorism	32	46,38 **2**	5	5,56 **3**	67	54,47	18	10,98
violence	n/a	n/a	1	1,11 **5**	n/a	n/a	n/a	n/a
total	69	100	90	100	123	100	164	100

Table 5: Cybersurveillance co-occurrence with NSA and Snowden

	cybersurveillance							
	NL				US			
	NSA		Snowden		NSA		Snowden	
keyword	quotation (#)	%	quotation (#)	%	quotation (#)	%	quotation (#)	%
cyber	n/a	n/a	n/a	n/a	8	1,57	12	2,76
monitor	52	35,86	47	43,12	40	7,86	23	5,30
spy	70	48,28	51	46,79	68	13,36	146	33,64
storage	7	4,83	4	3,67	124	24,36	47	10,83
surveillance	8	5,52	5	4,59	219	43,03	181	41,71
technology	8	5,52	2	1,83	50	9,82	25	5,76
total	145	100	109	100	509	100	434	100

Table 6: Positive co-occurrence with NSA + Snowden

	NL				US			
	NSA		Snowden		NSA		Snowden	
searched word	quotation (#)	%	quotation (#)	%	quotation (#)	%	quotation (#)	%
civil right	3	23,08	1	2,04	1	1,79	2	1,16
freedom	3	23,08	4	8,16	19	33,93	24	13,95
freedom of speech	1	7,69	1	2,04	n/a	n/a	2	1,16
hero	1	7,69	13	26,53	5	8,93	26	15,12
human right	2	15,38	26	53,06	7	12,50	57	33,14
legal	3	23,08	4	8,16	24	42,86	61	35,47
total	13	100	49	100	56	100	172	100

Table 7: Negative co-occurrence with NSA + Snowden

	NL				US			
	NSA		Snowden		NSA		Snowden	
searched word	quotation (#)	%	quotation (#)	%	quotation (#)	%	quotation (#)	%
abuse	2	13,33	2	4,65	8	11,94	20	11,24
crime	1	6,67	5	11,63	19	28,36	49	27,53
illegal	2	13,33	3	6,98	1	1,49	3	1,69
intrusion	3	20,00	3	6,98	4	5,97	3	1,69
prison	1	6,67	3	6,98	1	1,49	3	1,69
threat	n/a	n/a	3	6,98	8	11,94	19	10,67
traitor	2	13,33	22	51,16	10	14,93	41	23,03
violation	4	26,67	2	4,65	16	23,88	40	22,47
total	15	100	43	100	67	100	178	100

Table 8: The NL and the act of violation

Snowden & violation	
Codes	**Quotation**
burgerrecht, Obama, Snowden, schending	Snowden heeft geen vlieg kwaad gedaan door de wereld te attenderen op 'de schending van burgerrechten door de Amerikaanse regering'.
Obama, privacy, schending, Snowden	Nu is Snowden afgelopen week verder gegaan dan privacyschendingen van Amerikanen aan de kaak stellen.

NSA & violation	
Codes	**Quotation**
bescherming, controle, data, geheim, NSA, Snowden, Obama, schending	Na nieuwe onthullingen over duizendvoudige schendingen van de gegevensbescherming door de Amerikaanse geheime dienst NSA wordt de vraag naar betere controle in het Congres steeds luider.
controle, NSA, schending	Ze 'demonstreren dat de NSA de schendingen van de voorschriften controleert, erkent, behandelt en rapporteert', luidt het in een mededeling.
geheim, NSA, schending	De krant had onder aanhaling van een intern NSA-onderzoek en andere strikt geheime documenten over eclatante juridische schendingen van de geheime dienst bericht.

Table 9: The US and the act of violation

Snowden & violation Codes	Quotation
crime, hero, intrusion, leak, NSA, privacy, protection, Snowden, surveillance, violation	Snowden, 30, may be wanted by the U.S. government on criminal charges brought after his massive leaks of clandestine National Security Agency surveillance programs, but he has become a folk hero to those who believe the intelligence services have violated constitutional protections against government intrusions into their private lives.
crime, leak, NSA, Obama, Snowden, spy, violation	Federal prosecutors have filed a criminal complaint charging self-proclaimed NSA leaker Edward Snowden with two violations of the Espionage Act and the theft of government property, the first step in a process they hope will bring him back to this country to face trial.
NSA, Obama, privacy, Russia, Snowden, surveillance, violation	Snowden's disclosures about surveillance excesses by the National Security Agency that used to employ him as a contractor have embarrassed the Obama administration and given countries like Russia, China, Venezuela and others with whom Washington has sensitive relations grounds for casting the United States government as a hypocritical privacy violator.

NSA & violation Codes	Quotation
crime, hero, intrusion, leak, NSA, privacy, protection, Snowden, surveillance, violation	Snowden, 30, may be wanted by the U.S. government on criminal charges brought after his massive leaks of clandestine National Security Agency surveillance programs, but he has become a folk hero to those who believe the intelligence services have violated constitutional protections against government intrusions into their private lives.
data, leak, monitor, NSA, Obama, privacy, storage, violation	Several members of Congress reacted sharply to the leaked NSA audit, which documents 2,776 violations of privacy rules or court orders, mostly involving unauthorized collection of data on Americans or eavesdropping on foreign intelligence targets who entered the United States.
crime, leak, NSA, Obama, Snowden, spy, violation	Federal prosecutors have filed a criminal complaint charging self-proclaimed NSA leaker Edward Snowden with two violations of the Espionage Act and the theft of government property, the first step in a process they hope will bring him back to this country to face trial.

Table 10: Article titles NL (order at random)

NSA: Afluisteren voorkwam aanslagen
NSA verijdelde aanslag op beurs van New York
Vader Edward Snowden: 'Pleeg geen hoogverraad en kom alsjeblieft thuis'
Snowden, voor China een pion die je kunt offeren
'Spionageprogramma NSA voorkwam 50 aanslagen'
Obama: 'Spionageprogramma NSA is transparant'
Steve Wozniak boos over NSA: 'Dit is niet mijn Amerika'
Dit is het nieuwe mega-datacentrum van de NSA
Ondergedoken Snowden vanmiddag in live-chat met The Guardian
Snowden spreekt: 'Dit land is het waard om voor te sterven'
'NSA voorkwam aanslagen in VS en ruim 20 andere landen'
Paul Brill: 'Obama's dilemma laat Edward Snowden koud'
Honderden Chinezen demonstreren voor Snowden
'Snowden graaft zijn eigen graf, met een grote schop'
Obama's dilemma laat Edward Snowden koud
'Snowden is een held die alles opgaf om mensen te informeren'
'Snowden is een schurk die in de gevangenis thuishoort'
Groot-Brittannië beboet vliegtuigmaatschapijen die Snowden vervoeren
Klokkenluider Snowden niet welkom in Groot-Brittannië
Snowden: NSA hackte computers in China en Hongkong
Klokkenluider Snowden had zelf alarmbel nodig
Snowden: NSA hackte computers in China en Hongkong
'De NSA kon Boston niet voorkomen'
Snowden: VS hackt China al jaren
Edward Snowden: Ik voel me veiliger hier in Hongkong
NSA wil meer openheid geven over dataspionage
Baas NSA: tientallen complotten verijdeld
Ontwerper zet 'NSA-vrije' software op een rij
Baas NSA: tientallen aanvallen verijdeld met PRISM
Snowden: 'Ik ben geen verrader en geen held'
Verkoop 1984 van Orwell enorm gestegen sinds NSA-onthulling
Snowden is spoorloos, en ontslagen
'Klokkenluider Edward Snowden is een immorele einzelgänger'
Edward Snowden is een immorele einzelgänger
Hoe NSA zich 'big data' eigen maakte
Klokkenluider Snowden lekte duizenden documenten
Klokkenluider Snowden spoorloos verdwenen
Vriendin van Snowden blijft achter 'zonder kompas'
Booz Allen ontslaat klokkenluider Snowden na 'overtreden ethische code'
Chinese sociale media: bescherm Snowden en lever hem niet uit
Snowdenleaks
Koehandel met de NSA
NSA-lek maakt zichzelf bekend
Congreslid: 'Klokkenluider Snowden moet aan VS worden uitgeleverd'
Waarom asiel voor Snowden een moeilijk verhaal wordt
Merkel gaat NSA-kwestie aankaarten bij Obama
Petitie voor gratie NSA-klokkenluider

NSA verzamelt telefoondata van miljoenen Amerikanen
Assange schiet klokkenluider Snowden te hulp
Informele gesprekken over asiel Snowden
Biden belt president Ecuador om Snowden
'Ecuador en Rusland onderhandelen over Snowden'
'Snowden keert terug na garanties overheid'
Vader: Snowden wil met garantie naar VS
'Snowdens burgerplicht gaat vóór zijn geheimhoudingsplicht'
Ecuador heeft voor Snowden geen ruzie met VS over
Vader Snowden: Edward onder voorwaarden terug naar Verenigde Staten
Ecuador heeft voor Snowden geen ruzie met VS over
VS dreigt handel met Ecuador te staken bij asiel Snowden
Obama stuurt geen straaljagers op Snowden af
Ecuador neemt de tijd voor asielaanvraag Snowden
Naam Snowden op aanhoudingsverzoek klopte volgens Hongkong niet
Als Snowden mijn advies had gevraagd, had ik hem gezegd: doe het niet
Ecuador wil informatie van VS over Snowden
Relatie tussen Australië en buurlanden onder druk door Snowden
'Geheime diensten overleggen over Snowden'
'Snowden heeft gecodeerde bestanden klaargezet voor als iets met hem gebeurt'
Ecuador wil info VS over Snowden
Is Snowden veilig in de Russische transitzone?
Ook Poetin zal Snowden niet uitleveren
Snowden zit nog in Rusland, diplomatieke rel dreigt
Angst groeit over omvang databestanden Snowden
Snowden is niet op Russisch grondgebied geweest
Poetin: Snowden nog steeds op vliegveld en vrij om te gaan
Supermachten China, Rusland en VS in de clinch over één man: Snowden
Amerika eist van Rusland onmiddellijke uitlevering Snowden
VS hopen op uitlevering Snowden door Rusland
Ecuador verdedigt positie Snowden
VS teleurgesteld om weigering arrestatie Snowden
Ecuador: asielaanvraag Snowden is principekwestie
'Snowden zit niet in vliegtuig naar Havana'
De klopjacht op Snowden voert door drie continenten
Assange: 'Snowden is gezond en veilig. Ik kan niet zeggen in welk land hij nu is'
Witte Huis: zaak-Snowden slecht voor relatie met China
Snowden nam baan om inlichtingen te winnen
Advocaat Snowden: vertrek uit Hongkong begon met pizza en Pepsi
Snowden vraagt in Moskou asiel aan Ecuador
Snowden wil naar Ecuador
Snowden: Chinezen vaak doelwit NSA
Wikileaks: Snowden vroeg ons hem te helpen
Amerikaanse senator: Poetin moet van komst Snowden hebben geweten
Klokkenluider Snowden vraagt asiel aan in Ecuador
VS: 'Snowden mag geen land meer in of uit'
Klokkenluider Snowden vestigt hoop op anti-Amerikaans Ecuador
Snowden onder bescherming politie Hongkong
'VS vaardigen arrestatiebevel uit voor Snowden'

VS voert druk op Hong Kong op over snelle uitlevering Snowden
Vliegtuig staat klaar om klokkenluider Snowden naar IJsland te brengen
VS: arresteer Snowden
'Snowdens vliegtuig naar IJsland staat klaar'
'Vliegtuig gereed om Snowden naar IJsland te brengen'
NSA nam Snowden in dienst, ondanks twijfels over cv
Snowden: 'Britse GCHQ erger dan de VS'
Ecuador: 'Lot Snowden in handen van Rusland'
'Afluisteren EU-diplomaten door NSA enorm schandaal'
Guardian trekt verhaal in over Europese samenwerking met NSA
Snowden vraagt officieel asiel aan in Venezuela
Russische parlementariër schept verwarring over asiel Snowden
Gelekte NSA-documenten Snowden: 'VS bespioneert energiesector Latijns-Amerika'
Bolivia eist opheldering van Europa over Snowden
Snowden-video deel 2: 'Amerika zal zeggen dat ik de vijand help'
Snowden kan op asiel rekenen in drie Latijns-Amerikaanse landen
Snowden in drie landen welkom
Nog geen contact Snowden met Venezuela
Snowden: Duitsland en NSA onder één hoedje
Venezuela biedt Snowden asiel aan
Ook Bolivia biedt Snowden asiel aan
'Snowden zou met Morales meevliegen'
'Landen verteld dat Snowden aan boord toestel Morales was'
IJsland loopt nog niet warm voor Snowden
Snowden vraagt in nog zes landen asiel aan
Duizenden websites doen mee aan protest tegen 'schaamteloze spionage' NSA
Zes presidenten bijeen voor spoedtop Snowden
'Het Snowdenbaleffect: het is één groot potje Risk geworden'
'Gemiste kans voor Snowden: Oostenrijk is niet bang voor VS'
Spoedberaad leiders Zuid-Amerika na vliegtuigincident Snowden
Snowden niet aan boord omgeleid Boliviaans vliegtuig
Washington Post wil dat 'naïeve hacker' Snowden zich aangeeft in Amerika
Vader Snowden in open brief: 'Je hebt inlichtingendiensten doen ontwaken'
Edward Snowden ziet kansen op veilig toevluchtsoord afnemen
In Nederland vragen om asiel dom idee voor Snowden
Snowden stelt Russen voor een lastige keus
Teeven: Snowden maakt geen enkele kans
Fresku: 'Fok it, we moeten Snowden gewoon asiel verlenen'
Volledige tekst brief Snowden: 'Ik blijf toegewijd'
WikiLeaks: Snowden vroeg ook asiel aan in Nederland
India ziet 'geen reden' tot accepteren asiel Snowden
Nederlandse asielaanvraag Snowden
vanuit Moskou niet geldig
Deze landen willen klokkenluider Snowden in elk geval niet hebben
Waar kan Edward Snowden terecht?
Snowden hoopt op Rusland
Snowden verbreekt stilte met brief aan Ecuador
'Snowden heeft Rusland om asiel gevraagd'

Duitsland is woest. Gaan ze Snowden nu asiel verlenen?

'Snowden heeft 15 landen om asiel gevraagd'

Poetin: Rusland zal Snowden nooit uitleveren

Bush: Snowden schaadde veiligheid VS

Voormalig NSA-chef: in Nederland wordt veel meer afgeluisterd

Vader: 'Snowden is beter af in Rusland'

VS sussen Russen: Geen doodstraf Snowden

Veiligheidsdiensten FBI en FSB in gesprek over Snowden

VS zal geen doodstraf eisen tegen klokkenluider Snowden

Vrouwen offreren Snowden onderdak

President Gauck: klokkenluiders als Snowden verdienen respect

President Gauck: klokkenluiders als Snowden verdienen respect

Politici VS stemmen tegen inperken NSA

Advocaat: Snowden vreest voor zijn veiligheid

Snowden nog op vliegveld Moskou

Snowden blijft nog in transitzone vliegveld

NSA raakt verstrikt in e-mails

VS vragen Russen om opheldering over Snowden

Advocaat: Snowden mag weg, maar blijft nog even

Obama wil duidelijkheid over Snowden

NSA kan eigen e-mails niet doorzoeken

NSA moet zich ook voor de rechter verantwoorden

NSA neemt maatregelen om nieuwe Snowden te voorkomen

Poetin in zaak Snowden: relatie Amerika belangrijker dan gekibbel

'Snowden zal luchthaven Moskou mogelijk snel verlaten'

Snowden vraagt asiel in Rusland aan

Snowden vraagt officieel asiel aan in Rusland

Snowden zou nog veel NSA-stukken hebben

Duitse parlementariërs eisen NSA-onderzoek

Klokkenluider Snowden genomineerd voor Nobelprijs voor de Vrede

'Nog duizenden topgeheime stukken in handen Snowden'

Poetin: Snowden zit bij ons vast dankzij de VS

'Snowden maakt cruciale informatie over VS bewust niet openbaar'

Rusland: nog geen asielaanvraag Snowden

VS: asiel bieden aan Snowden zal band met Latijns-Amerika beschadigen

'Microsoft hielp NSA encryptie te omzeilen'

Snowden in brief: 'Amerikaanse regering ontneemt mij recht op asiel'

Kwestie-Snowden hindert topoverleg China-VS

'Snowden ontmoet vandaag mensenrechtengroeperingen'

Tientallen journalisten hopen glimp van Snowden op te vangen

Snowden voelt zich een 'patriot' en vraagt tijdelijk asiel aan in Rusland

Obama belt met Poetin over Snowden

Advocaat: Snowden wil tijdelijk asiel in Rusland

Russische geheime dienst bestelt typemachines om Snowden

'Geen reactie Snowden op aanbod van Venezuela'

Ex-werkgever Snowden niet verantwoordelijk voor lekken

Snowden heeft slechts bizarre routes

Overheid VS voor het eerst niet welkom op grootste hackersconferentie, dankzij Snowden

De bizarre routes die Snowden naar Venezuela moeten leiden
NSA verzamelt 'zo goed als alles' van internetgebruiker
'Snowden niet vanuit Rusland naar VS'
FBI wilde vader inzetten om Snowden terug te halen naar VS
Politici VS bezorgd na 'uitermate schokkende' NSA-onthullingen
Geheime dienst NSA schendt regelmatigde privacy
'Inlichtingendienst NSA overtrad vele malen de wet'
'NSA overtrad privacywet duizenden keren'
Snowden begon al eerder met downloaden geheimen
Directeur NSA zal onderzoekscommissie toch niet voorzitten
Snowden: 'Veel Amerikaanse journalisten hebben hun controlerende rol losgelaten'
Vader van Snowden mag zoon bezoeken
NSA bekijkt naar eigen zeggen 0,00004 procent van het dataverkeer
'VS mogen Snowden wel dankbaar zijn'
Vader Snowden krijgt visum om zoon te bezoeken
Assange: Obama zou Snowden moeten danken in plaats van bekritiseren
NSA wil medewerkers vervangen door computers
Duitse bedrijven gaan e-mails versleutelen na NSA-schandaal
E-mailservice Edward Snowden houdt er per direct mee op
Obama zegt afspraak met Poetin af om Snowden
Origineel en - dankzij Edward Snowden - spannend boek over bedrijfsethiek
VS praat toch met Russen ondanks Snowden
'Boodschap Al-Zawahri niet door NSA onderschept'
Snowden: een teleurgestelde patriot
SP: kreeg AIVD geld van NSA?
Russische website biedt Snowden baan aan
'Het gaat goed met Snowden'
Russen overwegend blij met Snowden
VS verbolgen over Russisch asiel klokkeluider Snowden
Bits of Freedom bloeit door Snowden
Praktijken NSA verontrusten politici in VS
Snowden krijgt asiel in Rusland
Snowden heeft vliegveld Moskou verlaten
Snowden: asielverlening is overwinning voor de rechtstaat
'NSA leest e-mail en chat zonder bevel'
NSA geeft gebruik miljoenen telefoongegevens toe
Obama bespreekt bevoegdheden NSA
Snowden nu echt in Rusland
'NSA kan alle e-mails en chats gewoon meelezen'
Partner NSA-onthuller uren vastgehouden
Partner journalist zaak-Snowden uren vast op Heathrow
'NSA wil miljarden voor meer mogelijkheden tot spionage'
Vooronderzoek naar activiteiten NSA
'Cuba weigerde Snowden te ontvangen wegens druk VS'
NSA'ers bespioneerden naast vijanden ook hun geliefdes
'NSA luistert ook VN-hoofdkwartier af'
'Snowden op laatste moment door Cuba geweigerd na druk VS'
NSA luisterde ook Verenigde Naties af

'NSA luisterde versleutelde VN-communicatie af'
'NSA betaalde Google en Yahoo miljoenen'
Snowden houdt digitaal spoor goed verborgen
Snowden: Britse overheid lekt nu expres zelf
The Guardian deelt info Snowden met NY Times
NSA-directeur spreekt op congres in Nederland
'NSA betaalde miljoenen aan Google en Yahoo'
NSA onderschepte talloze mails 'per ongeluk'
Britse politie: publicatie info Snowden kan levens kosten
'NSA kan 75 procent internetverkeer VS bewaken'
Duitse regering: nieuwe Windows 8 heeft 'achterdeurtje voor NSA'
NSA: 'Aantallen geheime spionageopdrachten worden openbaar'
NSA-rapport maakte melding van mogelijk 4000 lekken
NSA bespiedde presidenten Brazilië en Mexico
Beste NSA, kunt u helpen mijn e-mail terug te vinden?
Brazilië wil opheldering over spionage door NSA
Frans ministerie bespioneerd door NSA
'NSA bespioneert Frans ministerie'
Brazilië wil uitleg van VS over spionage door NSA

Table 11: Article titles US (order at random)

A modest proposal for the snoops at the NSA
Not just Verizon? Secret NSA effort to gather phone data is years old
NSA, Verizon surveillance program: What you need to know
Reactions to NSA surveillance: from outrage to cheerleading
Obama defends NSA surveillance programs in California stop
NSA program part of a larger effort to target Internet
Stay calm and let the NSA carry on
Letters: NSA snoops and freedom
Ex-CIA staffer was source of leak on NSA surveillance, Guardian says
Poll: Should Edward Snowden, the NSA whistle-blower, go to jail?
Edward Snowden gone from Hong Kong hotel, whereabouts unknown
Analyst overstated claims on NSA leaks, experts say
NSA leaker Edward Snowden: He's no Daniel Ellsberg
Edward Snowden fired, Booz Allen Hamilton says
Edward Snowden: Hero or criminal?
Attacking Edward Snowden misses the bigger problem
Without warrant, Hong Kong unlikely to act against Snowden
Snowden's dilemma: What are the possibilities for asylum?
NSA surveillance puts George Orwell's '1984' on bestseller lists
In 'Daily Show' hosting debut, John Oliver goes after NSA
Senators introduce bill requiring greater disclosure of NSA programs
ACLU sues Obama administration over NSA surveillance
Firefox's parent company launches campaign against NSA monitoring
Google discloses how it transmits data to NSA, other U.S. agencies
NSA leaker's girlfriend 'left lost at sea'
NSA aftershocks: Leak inspires lawsuit, letters of protest
U.S. using drones to kill Edward Snowden? Ron Paul wrong again
Letters: Jury is still out on Edward Snowden
Snowden tells Hong Kong media he'll fight extradition to the U.S.
Snowden alleges U.S. hacking against China, Hong Kong
NSA surveillance program is one of many Big Brothers watching
Republicans oppose, Democrats support NSA surveillance, poll says
NSA controversy: Should James Clapper go or stay?
NSA chief: Surveillance programs thwarted 'dozens of terrorist plots'
John Oliver hits GOP for backing NSA surveillance, not gun control
Officials: Edward Snowden took NSA secrets on thumb drive
U.S. faces challenges trying to charge Edward Snowden
Edward Snowden shows evolution of smuggling secrets
Snowden smuggled out data on thumb drive, officials say
Letters: Smearing Snowden
Chinese state media chide U.S. over Edward Snowden's allegations
Snowden's spying allegations spur Chinese to criticize U.S.
NSA surveillance disclosure could affect court cases
NSA leak and armored-truck robbery: the odd Florida connection
Daum: Who's afraid of the NSA?
China has several options on Edward Snowden
Facebook releases information on NSA requests for user data

Edward Snowden wrong about Hong Kong, some in territory say
Hundreds protest in Hong Kong in support of Snowden
Edward Snowden's not the first to make claims about NSA
NSA leaks: Privacy in the Facebook age
NSA leak threatens Web giants
G-8 meeting will test NSA leaks' effect on U.S. influence
Edward Snowden calls U.S. intelligence 'aggressively criminal'
Edward Snowden vows more disclosures about U.S. surveillance
Apple releases information on data requests from NSA, other agencies
NSA surveillance power shows technology is trumping liberty
Journalistic impartiality tested in NSA leak story
Ten political thrillers for Edward Snowden's Netflix queue
Goldberg: Snowden, a fool not a spy
Tech execs urge U.S. to help clear their names in NSA surveillance
NSA surveillance helped foil more than 50 attacks, officials say
Snowden says U.S. and Britain spy on friends as well as foes
Obama defends NSA digital surveillance programs
Prosecutors file Espionage Act charges against Edward Snowden
Snowden an eccentric, but hardly stood out at NSA
Pelosi booed by activists after criticizing leaker Edward Snowden
Snowden could avoid extradition from Hong Kong
Opposition to extraditing Edward Snowden builds in Hong Kong
Snowden extradition in hands of Hong Kong government
Letters: Snowden fallout
U.S. seeks Snowden extradition, urges Hong Kong to act 'soon'
U.S. officials vow pursuit of Snowden, cite extradition delays
U.S. lawmakers condemn China, Russia after Snowden flees Hong Kong
Snowden reportedly headed for Cuba after Moscow stopover
Snowden seeks asylum in Ecuador, government says
Snowden stopping in Moscow en route to Cuba, Russian says
Snowden leaves Hong Kong; final destination unclear
How Edward Snowden managed to outfox everyone
Edward Snowden, you could call Canada home
Moscow 'safest place' for Edward Snowden? Global spy mystery deepens
After missing Havana flight, Edward Snowden's whereabouts unknown
John Kerry admonishes China, Russia on Edward Snowden
Snowden's spying revelations are point of pride to some Brits
Putin: Edward Snowden still at Moscow airport, remains 'free man'
Russia, China reproach U.S. for Snowden remarks
China defends its handling of Edward Snowden case
Letters: The 'Where's Snowden?' game
Snowden's bid for Ecuador asylum could take weeks to approve
Ecuador official says media 'trying to confuse' on Edward Snowden
Snowden a prize for Russians -- until they have his secrets
Russian lawmakers suggest U.S. is violating Snowden's human rights
NSA: Showing Americans their phone data would help U.S. enemies
Could Edward Snowden hitch a ride with Venezuelan leader?
Obama doesn't want Snowden hunt to damage ties with Russia, China
Ecuador quits U.S. trade deal to avoid 'blackmail' over Snowden

'Not going to be scrambling jets' to get Snowden, Obama says
Edward Snowden: Not the first to be caught in airport limbo
Shepard Fairey approves of NSA parodies of his Obama 'Hope' poster
Terrorists harder to track after Snowden's leaks, officials say
Snowden leaks give edge to U.S. rivals, officials say
Edward Snowden's father seeks to broker deal with U.S. for son's return
The NSA is watching. So are Google and Facebook
Edward Snowden: Russia, Ecuador keeping NSA leaker at arm's length
Edward Snowden accuses Obama of deception'
Snowden accuses Obama of 'deception,' punishing him with exile
Is Edward Snowden stateless? Not really
Kremlin: Edward Snowden revokes request for Russian asylum
Snowden still looking for place to go after ruling out Russia
Edward Snowden desperately seeking asylum: *Habla español*, Edward?
Letters: What to do about Edward Snowden
Snowden getting the traitor treatment by U.S. friends and foes
Diversion of Bolivian plane in Snowden search angers Latin leaders
Snowden still seeks asylum offer; U.S. 'ready to take him back'
Protests against secret NSA tactics to light up Web July 4
Edward Snowden, a pawn in Venezuelan politics
Venezuela, Nicaragua open their doors to NSA leaker Snowden
Snowden adds six countries to his search for asylum
NSA spying fuels EU concerns about U.S.-based cloud services
Edward Snowden remains at Moscow airport as asylum offers arrive
Snowden should take Venezuelan asylum offer, Russian official says
The Week Ahead: EU-U.S. trade talks, Japan nukes, Snowden scandal
Brazil demanding answers from U.S. in wake of Edward Snowden leaks
Digital age expanded the NSA's mission
New oversight board hears testimony on NSA surveillance
Bipartisan privacy board hears conflicting reports on NSA programs
For NSA leaker Snowden, Venezuela or elsewhere?
U.S. accuses Russia of giving Snowden a propaganda platform
Russian activists voice support for Snowden's asylum bid
Mexico abuzz over accusations of spying tied to Snowden
Edward Snowden asks for help in getting Russia asylum
Edward Snowden seeks meeting with human rights groups, report says
Edward Snowden seeking asylum in Russia, report says
Russian foreign minister: Snowden hasn't yet applied for asylum
Putin hoping Edward Snowden leaves Russia as soon as possible
Edward Snowden applies for temporary asylum in Russia
Edward Snowden requests temporary asylum in Russia in compromise
Snowden digging himself in deeper with new threats, revelations
Temporary Russia asylum may end Edward Snowden airport stay 'any day'
NSA seeks to stop leaks following Edward Snowden case
Edward Snowden book coming from reporter Glenn Greenwald
NSA chief supports tech firms disclosing more on PRISM requests
Edward Snowden's Russian summer reading list
Edward Snowden turned back at Moscow passport control, official says
In Russia, Edward Snowden's bid to leave airport zone short-lived

Edward Snowden cleared to leave Moscow airport -- but not today
Layover from hell: Snowden marks a month in Moscow airport limbo
House defeats bid to curtail NSA's collection of phone records
The NSA surveillance driftnet can continue -- for now
Snowden, reading 'Crime and Punishment,' may see his own plight
Edward Snowden won't face death penalty in U.S., Holder says
Snowden won't face torture or execution, Holder tells Russia
Edward Snowden welcome in Venezuela? Not so much
NSA faces backlash over collecting phone data
Lawmakers promise more scrutiny of NSA surveillance
Beyond his Moscow airport limbo, indignities await Edward Snowden
Letters: Assuring that the U.S. won't torture Snowden
Give Snowden his due: He made a surveillance debate possible
Edward Snowden's father thanks Putin for protecting son
Concerns about NSA surveillance persist despite release of files
Public gets first look at once-secret court order on NSA surveillance
What next for Edward Snowden?
White House, senators condemn Russia decision on Snowden asylum
Edward Snowden asylum 'insignificant' to Russia -- but not to U.S.
Edward Snowden granted asylum, leaves Moscow airport in taxi
Edward Snowden asylum could scuttle Obama trip to Russia
Guardian account of NSA program XKeyScore misleading, officials say
Letters: Snowden's safety
Edward Snowden should remember Putin is no free-speech champion
Nixed Putin-Obama summit not really about Snowden, analysts say
Obama cancels meeting with Putin after Russia grants Snowden asylum
Obama's Moscow visit is called off, and not just because of Snowden
Russia says Obama hurting himself by canceling summit over Snowden
Obama talks Trayvon, Russia, NSA, Hillary 2016 on Leno's 'Tonight'
Obama moves on surveillance reform -- but disses Snowden
Obama outlines proposals for reining in NSA surveillance
What did Edward Snowden get wrong? Everything
Snowden's father decries 'political theater' over son's leaks
Rep. Tom McClintock calls for amnesty for Edward Snowden
NSA broke some rules, but is that the same thing as 'abuse'?
New Snowden leaks reveal problems at NSA
Are films like 'Paranoia' the start of a post-Snowden movie moment?
Britain asked to explain detention of Snowden reporter's partner
NSA unlawfully collected tens of thousands of U.S. emails
Court opinions shed light on unlawful NSA email collection
NSA having flashbacks to Watergate era
Snowden's Moscow stay an accident, Russian paper reports
Microsoft pledges to move forward with NSA surveillance lawsuit
U.S.-Russia feud over Snowden cuts both ways
New Snowden documents allege U.S. spying on Brazil, Mexico
Snowden contacted Russia while in Hong Kong, Putin says
Latest Snowden revelation: NSA sabotaged electronic locks

Table 12: Elaborated coding scheme NL

Code	Family	Coded on	Words found	Additional
afluisteren	cybersurveillance	afluister, afgeluisterd monitor, aftap	afluisteraars, afluisteracties, afluisterde, afluisteren, afluisterinstrumenten, afluistermethoden, afluisteroperatie, afsluiteroperaties, afluisterpraktijken, afluisterprogramma, afluisterpogramma's, afluisterradar, afluisterschandaal, afluistersystemen, afluistert, afluistertechnieken, afgeluisterd, afgeluisterde, gemonitord, monitor, monitoring, monitorstation, aftap, aftappen, aftapprogramma's, aftapt	
angst	security	angst	angst, zielsangst	done by hand
bedreigen		bedreig	bedreigd, bedreigde, bedreigen, bedreigende, bedreiging, bedreigingen, bedreigt,	
bescherming	security	bescherming, bescherm	privacybescherming, beleidsbescherming, bescherm, beschermd, beschermde, bescherming, beschermt, gegevensbescherming	
binnendringen		binnendringen	binnendringen	
burgerrecht		burgerrecht	burgerrecht, burgerrechtenbeweging	
controle	privacy	control,	controle, controleapparaat, controlecommissie, controleert, controleprogramma, controleren, controlerende, controlestaat, controleurs, gecontroleerd, gecontroleerde, internetcontroleprogramma, paspoortcontrole,	
cyber	cybersurveillance	cyber	cyberaanvallen, cybercrime, cybercriminaliteit, cybercriminelen, cyberoorlog, cyberspionage,	
data		data, gegevens	metadata, telefoondata, buitenlanddatabase, data, database, databestanden, datacell, datacenter, datacenter, datacommunicatie, datalekkende, dataspionage, dataverbindingen, dataverkeer, dataverzamelen, dataverzameling, dataverzoeken, internetdata, communicatiegegevens, gegevens, gegevenbescherming, gegevensverzameling, gegevensverzamelingen, gespreksgegevens, internetgegevens, paspoortgegevens, privégegevens, telefoongegevens	
eed		eed	eed	done by hand
geheim		geheim	geheim, geheimen, geheimhouding, geheimhoudingsplicht, geheimzinnige, staatsgeheimen, topgeheim	
gevangenis		gevangenis, gevangenzetten	gevangenis, gevangenzetten	
geweld	security	geweld	geweld, gewelddadige	
held		held, heroïsch	Held, helden, heldendom, heldhaftig, heldhaftige, superheld, superheldencape,	

			heroïsche	
illegaal		illega, onwettig	Illegaal, illegaals, illegale, onwettig, onwettige	
inbreuk		inbreuk	inbreuk, inbreuken	
individu	privacy	individu	individu, individualistisch, individuele, individuen	
klokkenluider		klokkenluider, klokkeluider	klokkeluiden, klokkeluider, klokkeluiders, klokkeluiderswebsite, klokkenluider, klokkenluiders, klokkenluidersbeweging, klokkenluiderscollectief, klokkenluidersgroep, klokkenluidersorganisatie, klokkenluiderssite, klokkenluiderswerk, klokkenluiderswebsite	
legaal		legaal, legale	X	
lek	privacy	lek	lek, lekke, lekken, lekt, lekte, uitgelekt, uitlekken, uitlekte, datalekkende, gelekt, gelekte	done by hand
lichamelijk	security	lichamelijk	X	
mensenrecht		mensenrecht	mensenrecht, mensenrechten, mensenrechtenactivist, mensenrechtenactivisten, mensenrechtengroepen, mensenrechtengroeperingen, mensenrechtenombudsman, mensenrechtenorganisaties, mensenrechtenrapportage, mensenrechtenschendingen, mensenrechtensituatie, mensenrechtenwerkers	
misbruik		misbruik	misbruik, misbruiken, misbruikt, rechtsmisbruik	
misdaad		misdaad, misdaden, misdadig, misdadiger, misdrijf, misdrijven, criminaliteit, crimineel, criminele	misdaad, misdaden, misdadig, misdadiger, misdrijf, misdrijven, criminaliteit, crimineel, criminele	
nationale veiligheid		nationale veiligheid	nationale veiligheid	
NSA		NSA, National Security Agency	NSA, National Security Agency	case sensitve
Obama		Obama, VS, Verenigde Staten, Amerika, Washington	Obama, Obama's, VS, Verenigde Staten, Amerika, Amerikaan, Amerikaans, Amerikaanse, Amerikanen, Amerika's	case sensitve for all
onacceptabel		onacceptabel	onacceptabel, onacceptabele	
opslag	cybersurveillance	opslag, opslaan,	opslag, opslaan, opslaat	

			opslaat
persoonlijk	privacy	persoonlijk	persoonlijk, persoonlijke
privacy	privacy	privacy, privé	privacy, privacybescherming, privacybewuste, privacybezwaren, privacykwesties, privacyrechten, privacyschandaal, privacyschendingen, privacywet, privacywetgeving, privacywetten, privé, privéberichten, privégegevens, privéleven, privélevens, privésfeer
Rusland		Rusland, Russisch, Poetin, Moskou	Rusland, Ruslands, Poetins, Moskou, Moskou's
schending		schending	mensenrechtenschending, privacyschendingen, schending, schendingen
Snowden		Snowden	Snowden, Snowdenbaleffect, Snowdenleaks, Snowdens, aksSnowden
spion	cybersurveillance		bedrijfsspionage, bespioneerd, bespioneerde, bespioneerden, bespioneert, bespioneren, contraspionage, cyberspionage, dataspionage, espionage, espionnage, gespioneerd, internetspionage, spion, spionage, spionageactiveiten, spionagebaas, spionagedienst, spionagediensten, spionagedocumenten, spionagenetwerk, spionagonthullingen, spionageopdrachten, spionagepraktijjken, spionageprogramma, spionageprogramma's, spionagewet, spionagewetgeving, spioneert, spioneren, spionnen
surveillance	cybersurveillance	surveillance, surveilleren	surveillance, surveillanceprogramma's, surveillancestaat, surveillancesysteem, surveillancetechnieken, surveilleren
technologie	cybersurveillance	technologie, technologisch, elektronica, elektronisch	softwaretechnologie, technologie, technologiebedrijven, technologisch, technologische, electronic, eletronica, electronicafabrikanten, elektronisch, elektronische
terrorisme	security	terroris, aanslag	terrorisme, terrorismebestrijding, terrorismeverdachte, terrorist, terroristen, terroristenplannen, terroristische, antiterrorismewet, eenlingterroristen, aanslag, aanslagen, bioscoopaanslag bomaanslag, bomaanslagen, marathonaanslag, schoolaanslag, terreuraanslag, terreuraanslagen
toestemming	privacy	toestemming, goedgekeurd, goedkeuring	toestemming, goedgekeurd, goedkeuring
veiligheid	security	veiligheid, veilig, zekerheid, zeker	internetveiligheid, staatsveiligheid, veiligheid, veiligheidsadviseur, veiligheidsbeleid, veiligheidscheck, veiligheidscongres, veiligheidsdeskundigen,

		veiligheidsdienst, veiligheidsdiensten, veiligheidsexpert, veiligheidsexperts, veiligheidsorganisatie, veiligheidsorganisaties, veiligheidsraad, veiligheidsredenen, veiligheidsrisico, veiligheidsrisico's, veiligheidssector, veiligheidsteam, veiligheidstop, veilig, veiligstellen, beveiligd, beveiligde, beveiligen, beveiliging, beveiligingsbedrijf, beveilingscode, beveiligingssystemen, internetbeveiliging, zeker, zekere, zekerheid	
verraad	verraad, verrad(er)	hoogverraad, landverraad, landverrader, verraad, verraden, verrader	
vijand	vijand	vijand, vijandelijke, vijanden, vijandig, aartsvijand	
vrijheid	vrijheid, vrijheden	vrijheid, gastvrijheid, internetvrijheid, internetvrijheidsbeweging, persvrijheid	
vrijheid van meningsuiting	vrijheid van meningsuiting	vrijheid van meningsuiting	
waarde	waarde	waarde	done by hand
wet	wet, wetten	wet, wetten	done by hand

Table 13: Elaborated coding scheme NL

Code	Family	Coded on	Words found	Additional
abuse		abus	abuse, abused, abuser, abusers, abuses, abusive	
adversary		adversar	adversaries, adversary	
civil right		civil right	civil right	
control	privacy	control	control, controlled, controlling, controls	
crime		crime + criminal	crime, crimes, criminal, criminality, criminalize, criminalizing, criminals	
cyber	cybersurveillance	cyber	cyber, cyberattacks, cybernetic, cyberoperations, cybersecurity, cyberspace	
data		data	data, databank, database, databases, datacell, datalogix, metadata, metadatayet,	
fear	security	fear	fear, feared, fearing, fears	
freedom		freedom, liberty	freedom, freedoms	
freedom of speech		freedom of speech	freedom of speech	
hero		hero	hero, heroes, heroic, heroine, heros	
human right		human right	human right	
illegal		illegal, illegitimate, unlawful	illegal, illegally, illegitimate, unlawful	
individual	privacy	individual	individual, individualized, individuals	
intrusion		intrus	intrusion, intrusions, intrusive	
Law		law	law, lawbreaker, lawbreakers, lawbreaking, lawful, lawfully, lawmaker	
leak	privacy	leak	leak, leaked, leaker, leaking, leaks	case sensitive (exclude WikiLeaks)
legal		legal	extralegal, legal, legality, legalize, legally,	by hand (exclude illegal)
monitor	cybersurveillance	monitor, eavesdrop	monitor, monitored, monitoring, monitors, eavesdrop, eavesdropping	
national security		national	national security	case sensitive (due to

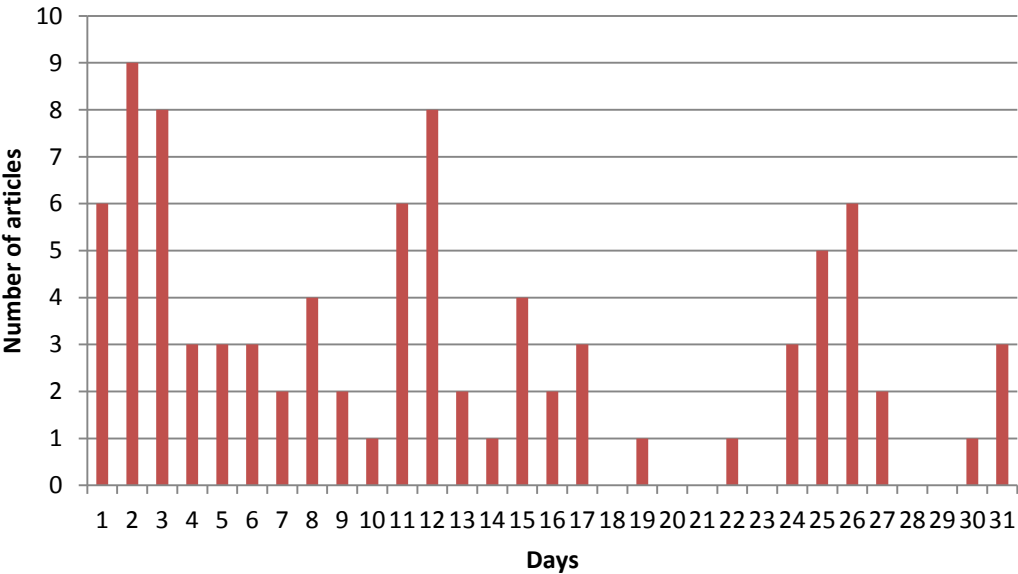|		security		National Security Agency)
NSA		NSA, National Security Agency	NSA, National Security Agency	case sensitive for NSA
oath		oath	oath, oaths	
Obama		Obama + United States + US + USA + Washington, America, American	Obama, United States, US, USA, Washington, America, American, Americans,	case sensitive for US + USA
permission	privacy	permission, permit, approv	permission, permit, permitted, permitting, approval, approve, approved, approves, approving	
personal	privacy	personal	personal, personally	
physical	security	physical	physical, physically	
prison		prison + jail	prison, prisoner, prisons, imprison, imprisonment, jail, jailing	
privacy	privacy	priva	privacy, private, privately	
protection	security	protect	protect, protected, protecting, protection, protections, protective, protectively, protector, protectors, protects, unprotected	
Russia		Russia, Moscow, Putin	Russia, Russian, Russians, Russias, Moscow, Moscows, Putin, Putinist, Putins	
security	security	secur, safe	secure, secured, securing, securities, security, unsafe, safe, safeguard, safeguards, safehouse, safely, safer, safest, safety	case sensitive (exclude National Security Agency)
Snowden		Edward, Snowden	Edward, Snowden	
spy	cybersurveillance	spy, espionage	spy, spycraft, syping, espionage, spies	
storage	cybersurveillance	storage +store + collect	storage, store, stored, stores, storing, collect, collected, collecting, collection, collections, collective, collects	
surveillance	cybersurveillance	surveillance	surveillance	
technology	cybersurveillance	technology +	technical, technically, technician, technicians, technological, technologies,	

		technical + electronic	technologist, technology, electronic, electronics
terrorism	security	terrorris, attack	counterterrorism, counterterrorist, terrorism, terrorist, terrorists, cyberattacks, attack, attacked, attackers, attacking, attacks
threat		threat	threat, threatened, threatening, threatens, threats
traitor		traitor, treason, betray	betray, betrayel, betrayed
unacceptable		unacceptable	unacceptable
value		value	value
violation		violat, breach	violate, violated, violates, violating, violation, violations, violator, breach, breached
violence	security	violen	violence, violent
whistleblower		whistle	whistle, whistleblower, whistleblowers, whistleblowing, whistles

Figure 4a: number of articles used in NL (June – September)
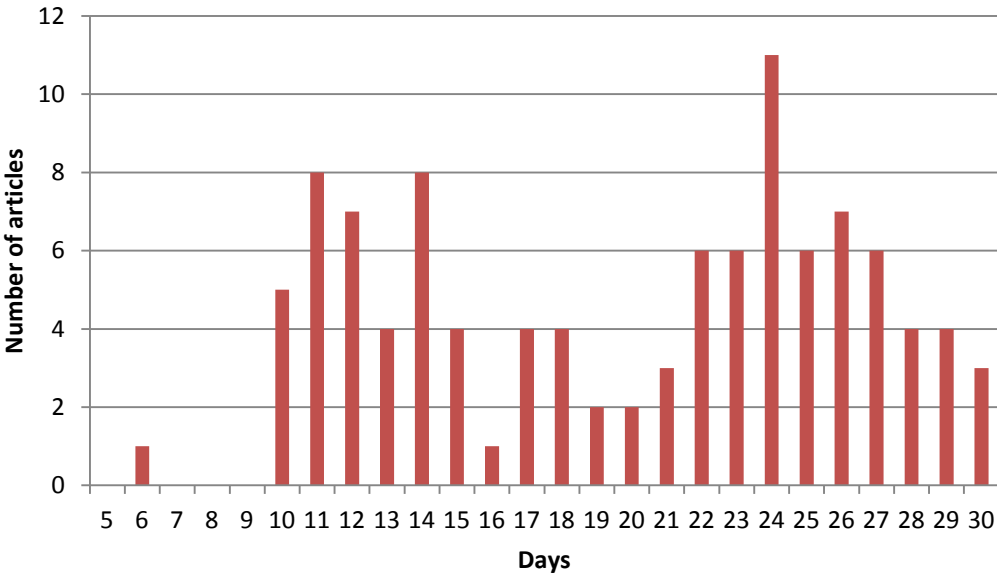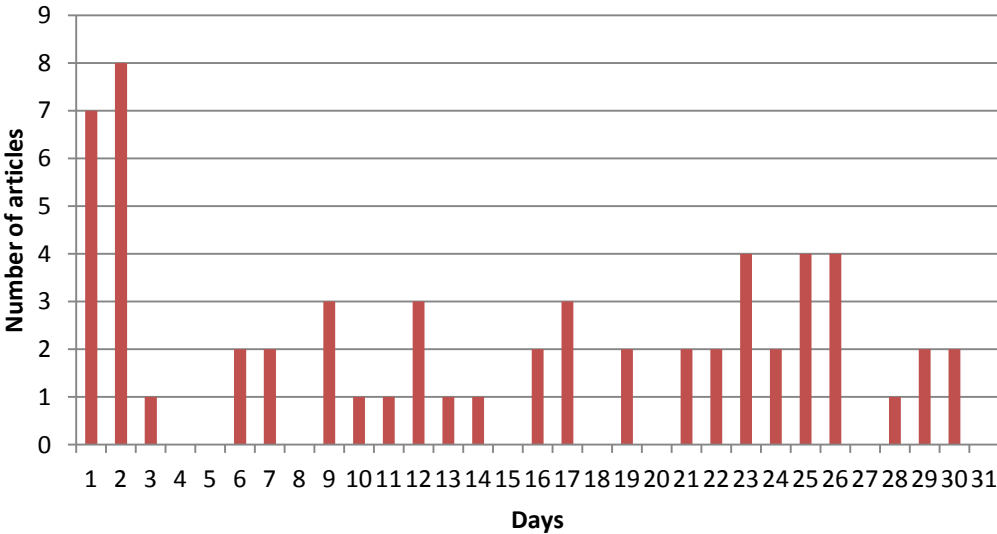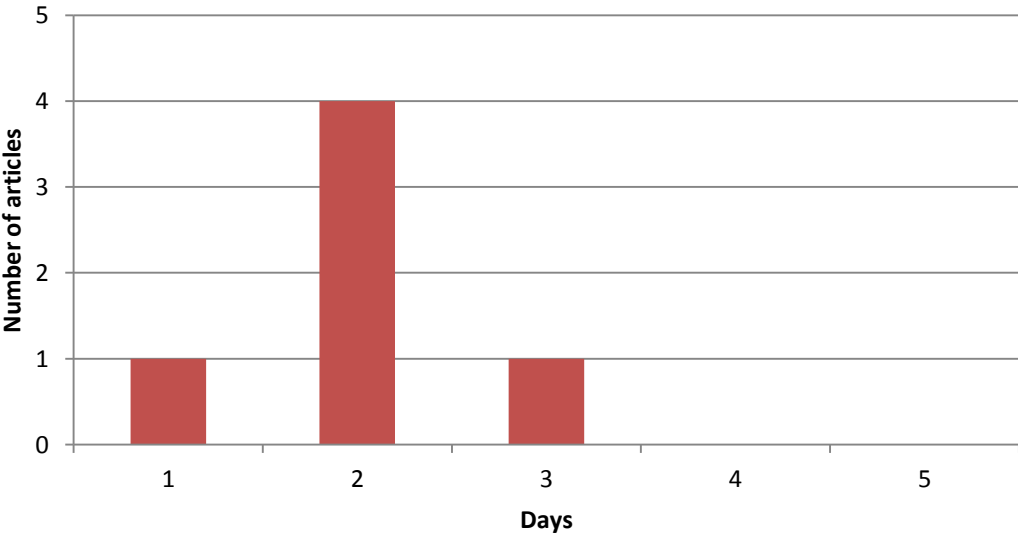
Figure 4b: Number of articles used in VS (June – September)