Communication in online fan communities: The ethics of intimate strangers

ABSTRACT
Dan O’Brien gives an excellent analysis of testimonial knowledge transmission in his article ‘Communication Between Friends’ (2009) noting that the reliability of the speaker is a concern in both externalist and internalist theories of knowledge. O’Brien focuses on the belief states of Hearers (H) in cases where the reliability of the Speaker (S) is known via ‘intimate trust’, a special case pertaining to friendships with a track record of reliable or unreliable reports. This article considers the notion of ‘intimate trust’, specifically in the context of online fan communities, in which the amount of time as a member of an online fan community and the extent of one’s posting history often results in something like ‘intimate trust’ between fans who are, for all other purposes, strangers. In the last two years, Twitter has provided a number of celebrities with a place to update fans and ‘tweet’ back and forth an innumerable number of times in any given day. This accentuates the intimacy to such a level that it becomes a ‘caricature of intimacy’ – the minute-to-minute updates accentuate the illusion that the fan ‘knows’ the celebrity, but the distance and mediation are still carefully maintained. This is an issue with both ethical and epistemological implications for fan-fan and fan-celebrity relationships online, considering ethics of care and ethics of justice, whether fans ‘owe’ celebrities a certain amount of distance and respect, and whether stars owe the fan something in return, either in the sense of reciprocal Kantian duties or Aristotelian moderation.

KEYWORDS
Aristotle
intimacy
reliabilism
erotomania
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TWITTERING ADORATION MACHINES

If you do a search on social networking site Twitter for any celebrity’s @ replies, you will notice that every so often, there is a set of messages from one fan. The tiny little avatar image of the sender, if only one message is sent, will remain alone. But when more than one message is sent in the span of a few hours (often the case with an enthusiastic fan), the avatar photo will have a connected photo in the lower right corner of the celebrity who the fan was tweeting, even if the celebrity never responds. If you click on the text below one of the messages, text which says ‘Show Conversation’, all of the tweets sent by the fan will open in a drop-down, and a question will appear at the bottom: ‘Why are all these messages from [the fan’s Twittername]?’ If you click on the question, an optimistic message appears, implying that perhaps there was an actual conversation between the two parties, rather than a one-sided soliloquy professing adoration.

SOCIAL NETWORKING: PORTALS FOR MORTALS

This is an attempt to give a fuller answer to that immortal Twitter question, ‘Why are all these messages from [the fan’s Twittername]?’ We are all probably familiar with ‘stalker’ fans, such as those fans who victimized Jodie Foster, Rebecca Shaeffer and David Letterman. But the advent of the internet, especially the popularity of constant and immediate Tweets and status updates, and the commodification of paparazzi photos of celebrities, have created an atmosphere in which an illusion of intimacy between celebrity and fan has become not only common, but also seen as a necessary marketing tool key to the celebrity’s success. In this context, the celebrity walks a fine line between revealing too much, and not sharing enough so that the ‘fan’ can feel a sense of connection.

So too must the fan walk a fine line between being interested in the celebrity’s life and upcoming projects, and going too far into a phase of feeling too much investment in the celebrity’s career or personal life. In the early days of Hollywood, fan magazines and publicists had a close relationship, so much so that fan magazines would usually only print stories depicting the accepted, ‘studio-approved’ stories about celebrities. Now, paparazzi chase celebrities in an attempt to catch them in unflattering personal moments, to catch them in an embarrassing situation, to create a media moment. The internet provides celebrities themselves with a direct means of communication with fans, in some cases this is beneficial to their careers, or a way for the celebrities themselves to control the ‘lead’.

The liminal economies at work in these relationships are complex. Paparazzi and celebrities will often form a unique bond or relationship, and celebrities who give paparazzi photo opportunities will often be more willing to sell photos that are flattering to that celebrity. In turn, the fans will frequent paparazzi websites, increasing the number of ‘hits’ and increasing the profits of the website owners. Even if the fans are not buying tabloid magazines, they inadvertently benefit the paparazzi simply by making the websites where paparazzi have sold their photos more popular and viewed, and attractive to advertisers. In terms of social networking sites like Twitter, some celebrities engage in financial relationships with the social networking site, promising to post updates regularly and mention their participation in the social networking site during interviews on television.

As the situation of fan-celebrity-mass media-social networking is so complex, any effort to derive moral obligations for the participants will be
limited by what Kant would call ‘mixed motivations’\(^1\). The situation gives mutual benefits to both the fan and the celebrity, yet increases the risk. The relationship between fan and celebrity has been romanticized in many films, perhaps one of the most charming is *Singin’ in the Rain* (1952). Directed by Gene Kelly and Stanley Donen, the film features Debbie Reynolds as Kathy Selden, introduced as a normal girl in Hollywood before the days of ‘talkies’; films with sound. One evening she is driving her convertible, and unexpectedly, a man jumps into her car. The man is unknown to Kathy, or so we are led to believe. He is the film star, Don Lockwood, played by Gene Kelly. When Kathy pretends not to know him, Kathy is being coy. It will take another twenty minutes of the film before we know that Kathy actually knew who he was from the beginning – she has not only been buying fan magazines so that she can follow his career and social outings to Hollywood hotspots like the Brown Derby, she was also the president of his fan club. The full extent of Kathy’s ‘fangurl’ status is actually not even clear from the theatrical release of the film, the scene where Debbie Reynolds sings the song ‘Lucky Star’ was cut, and is only available on special edition DVDs of the film as an outtake:

I wonder ... I wonder how many girls would consider it lucky /
To be held in the strong, manly arms of Donald Lockwood! /
The glamorous star of the silver screen! /
A year ago it would have scared me half to death. /
That was when I was a member of your fan club. /
Fan? Me? I was the president! /
Why, you know, I waited outside the Brown Derby for two hours one night /
Just to get a glimpse of you. /
But it was worth it! You looked so dazzling
in your green knickers, /
Yellow sweater, and orange beret! /
I just swooned! /
You see ... /
I was star struck. /

(Words: Arthur Freed; Music: Nacio Herb Brown)

By the end of the film, Kathy and Don have fallen in love, and Kathy’s voice has helped to save one of Don’s films, ‘The Duelling Cavalier’. It is exactly this kind of romantic narrative that gets all of us in trouble, fans and celebrities alike. She is his fan, she is buying the fan magazines, she manages to charm him personally and help his career. Any possibility that she was an obsessed fan had to be downplayed for the story to work.

**LOVE INAPPROPRIATE AND APPROPRIATE**

There is a fine line between appropriate and inappropriate love. One example comes from Plato in the *Gorgias*. It is Gorgias’s defense of Helen of Troy, being overtaken by love, that inspires the discussion of love in the dialogue:

If, however, Helen was abducted by force, it is clear that the aggressor committed a crime. Thus, it should be he, not Helen, who should be blamed. And if Helen was persuaded by love, she should also be rid of ill repute because ‘if love is a god, with the divine power of the gods, how could a weaker person refuse and reject him? But if love is
a human sickness and a mental weakness, it must not be blamed as mistake, but claimed as misfortune'.

(Plato, p. 32)²

So while Helen is not blameworthy on Gorgias’ account, because love is a form of sickness or mental weakness, Socrates draws a finer distinction between love that is appropriate and inappropriate, based partly on the negative effects an inappropriate love can have in one’s life. Plato notes the disadvantages to one’s health and wellbeing that emerge from the inappropriate loves of rhetoric, pleasure, power and self. In his discussions with Callicles, Socrates notes that Callicles’ own loves leave him in a position of discord with himself. The love of the truth expressed by Socrates as philosopher is held up to us as an alternative.

Does life without such love, even if misplaced and inappropriate, leave us with the ‘inharmonious lyre’ and ‘no music in the chorus’ that Socrates prefers? To fully understand what Socrates means, we must remember that he also loves Acibiades, mentioned in both the Gorgias and the Symposium. The Symposium provides us with a fuller list of the benefits of love (eros), not the least of which is that eros inspires the lover to earn the admiration of his beloved. One example of earning such admiration is by showing bravery on the battlefield, since nothing shames a man more than to be seen by his beloved committing some inglorious act, such as cowardice (Plato, pp. 178d−179b).

The ways in which some fans attempt to win the love of celebrities shares some characteristics with the battlefield, especially if the celebrity is someone who is criticized often for their style of comedy or dress. Fans cast themselves in the role of an avenging angel, or a Don Quixote defending the never-present but still loved Dulcinea.

So, to the extent that love inspires us to become our best self, love has value and worth. Love is said to create justice, moderation, courage and wisdom. In the section of the Symposium with Diotima, we are told that Love is beggarly, harsh and a master of artifice and deception (Plato, pp. 203d) and is delicately balanced, resourceful (Plato, pp. 204c). Love has a purpose, the attainment of immortality (Plato, pp. 207a and b). The human desire for immortality, and the need to procreate, is at the root of Love’s inspiration. Diotima then explains how Love illustrates how to become a Philosopher, or a Lover of wisdom. Those who become lovers of wisdom will give birth to intellectual children of greater immortality than any conceived through procreation.

IN LOVE WITH LOVE

Is it possible then, that the fan-celebrity relationship is grounded in a mistaken type of love. One possibility is that fans who invest themselves in these kinds of relationships are ‘in love with love’, or ‘in the love with the feeling of being in love’. Browsing fan sites and fan forums shows a variety of rewards for repeated behaviour, which then becomes a habit, and potentially an addiction that one ‘needs’. For example, most fan forums reward participants with status levels for the number of times they post. In the case of Twitter, there is the possibility of being rewarded with a Tweet reply from the celebrity, and there is the building of a community among fellow fans. Relationships develop around continued participation in the online context, with a set of rewards and benefits that perpetuate and refresh the fan’s feeling of belonging, of investment in the celebrity’s career. In this way a variety of imbalanced friendships can
form – there is the illusion of friendship between fan and celebrity (eros), and
between fans, those who are older fans, those who have met the celebrity, and
can dole out praise and kind words to newer fans (philia).

These friendships are often imbalanced, because of the difference in status
of the two players – in each case there is a distinct hierarchy of fan levels and
achievement, or the inherent status difference between celebrity and fan. For
this reason, Aristotle and Plato would note the problematic nature of such
friendships. But one should say that such friendships can rest on a genuine
grounding of care and concern between the parties involved. A variety of fan
communities have rallied around a fan who is undergoing a challenge in life,
going beyond the call of duty and creating a sort of caricature of intimacy
between strangers. These challenges range from the death of a loved one, to
major surgery, to fans battling with cancer. Many fan forums have actively
engaged in internet campaigns to help a fellow fan with a terminal illness get
a chance to meet their celebrity, whether through private donations, commu-
nication through private channels, or the sharing of tickets or information
about where the celebrity will be available for a meet and greet.

RELIABILISM, AND THE CARICATURE OF ‘INTIMATE TRUST’

In his article ‘Communication Between Friends’ in Empedocles: European Journal
for the Philosophy of Communication, Dan O’Brien gives a careful analysis of
reliability. A Speaker (S) is able to transmit knowledge (p) to a Hearer (H)
if they are ‘a reliable testifier with respect to p, or to subject matter relevant
to p’ (O’Brien, p. 28). Externalists hold that reliability is all that is required
for knowledge (for H to believe that p from S). In contrast, Internalists argue
that H must also be aware of specific reasons to think that S’s utterances are
correct. O’Brien analyzes the awareness of the reasons H has to believe –
analysis of the trust that H has in S, if you will. In special cases, the topic
of conversation is one that is ‘constitutive of the friendship’ between S and
H. For these constitutive conversations, a lack of trust in the testimony of S
would actually threaten the friendship of S and H, the door is open to ‘inti-
mate trust’ (O’Brien, p. 29). To illustrate the point, O’Brien compares the rela-
tive importance of an acquaintance’s Facebook status update (low intimacy,
low threat to relationship), and a conversation involving a close friend’s reli-
gious confession (high intimacy, high threat to relationship). The status of the
friendship, and the trust that H puts into the relationship, involves a type of
intuitive stance on the part of H. Citing Sarah Stroud, ‘Friendship positively
demands epistemic bias, understood as an epistemically unjustified departure
from epistemic objectivity’ (Stroud, p. 518).

For members of online fan communities, a caricature of this same depart-
ure from objectivity results. The amount of time one has been a member of
an online fan community, the number of postings one creates, the amount
of successful contact with a celebrity through Twitter @ replies, all increase
the fan’s status level (both literally, in websites where the number of posts
denotes a specific level of fandom, and figuratively with long-time fans and
high-number posters taking on the status of pseudo-moderators of the
forum). A lack of trust in the testimony of the high-ranking fans would be
unimaginable, and as much of a shock as an intimate friend making a lying
confession.

The notion of intimate trust among fans is perhaps most interesting in cases
where long-time fans are invited to interpret specific aspects of a celebrity’s life,
since if they have been watching the celebrity from a distance for a longer period of time, and they have ‘Twittered’ with the celebrity, it is often assumed that they know the celebrity more authentically. As such, newer fans will ascribe a special reliability to the older fan’s musings. The Internet friendship between the fans, and the authority of the long-time fan, is constitutive of their online life in that particular fan community. The fan’s interpretation of a paparazzi photograph (‘Does he look upset here?’) or the celebrity’s sincerity (‘Would he get engaged to get more tabloids attention, or is this a “real” engagement?’), or the celebrity’s health (‘He’s lost so much weight since he moved to Los Angeles, do you think he’s alright?’), are held to be more reliable if the fan has been a member of the forum for a sufficient amount of time, if they have posted previous interpretations of the celebrity that turned out to be true or verifiable, and if they have had personal contact with the celebrity. In turn, this perceived intimacy between the long-time fan and the celebrity, increases the likelihood that new fans will seek ‘intimate’ online friendships with the long-time fan. A web of intimate relationships result, each relationship imbued with ascriptions of reliability, and with a specific set of reasons for the Hearer to believe the Speaker.

O’Brien also discusses the issue of partiality, especially the partiality that is obtained between acquaintances rather than strangers. The example he gives involves the difference in one’s reaction and attitudes towards a stranger who confesses they have been accused of stealing, and a new work colleague with whom you have bonded who confesses they have been accused of stealing. O’Brien argues that it is easier to be non-committal to the stranger, whereas it may not be possible to be non-committal to the bonded work colleague or a friend. Further, O’Brien argues that such partiality is not only morally or intimately acceptable, but that it is also epistemologically acceptable (O’Brien, p. 35). We are more open to our intimate friends’ beliefs, we often hold our friends’ beliefs to be reliable, and we often ‘borrow’ inferences that reliable friends have made in forming their beliefs (O’Brien, p. 38).

Fan communities work in a similar way. A long-time fan named Sarah is known to have posted on a fan forum for a number of years, she has posted more than 1,000 times on the fan forum and achieved a high-ranking status level, she has been to performances of the celebrity a number of times, she has Twittered back and forth with the celebrity a number of times in the last two years (and she has made a listing of each Twitter @ reply she received from the celebrity and displays it in the signature of each post she makes on the fan forum). A relatively new fan named Tara asks Sarah her opinion of a paparazzi photograph in which their favourite celebrity looks a bit tired and drawn, scowling and not smiling. Sarah replies, saying it must have been a difficult day, it was the end of a long period of filming a scene for the celebrity’s next movie, and perhaps the celebrity is getting tired of seeing the paparazzi because they have been present and photographing near the film set every day during the past week. Tara will probably (1) find Sarah reliable, (2) believe Sarah’s explanation for how the celebrity looked in the photograph, and (3) adopt Sarah’s inferences as to the real cause of the celebrity’s appearance.

Another individual with a shorter track record might chime in to the conversation claiming special knowledge. Perhaps unknown to both Sarah and Tara, the individual is a personal assistant or production assistant working on the film that the celebrity is filming. Perhaps they know some other explanation for the celebrity’s appearance – a fight with a significant other, a return to a previous drug addiction, a loss of investments in a Madoff-style scheme. But if any of these explanations are offered, even if true, the fans will
probably dismiss them in favour of the long-time fan (and ‘intimate friend’)
who is a known member of the fan community. The ascription of reliability is
paramount. In these situations O’Brien is right, it is both possible and permi-
sible to believe the known, long-time fan (to be partial). Whether it is ‘advis-
able’, and whether spending time on fan community sites is ‘advisable’, is a
separate question.

KANTIAN ETHICS BETWEEN FANS AND CELEBRITIES

If fans engage in relationships with each other based on ethics of care, the rela-
tionship between celebrity and fan is best conceived of as rule-bound. There
is what Kant would call an inherently mutually usury relationship between
celebrity and fan. The fan is arguably using the celebrity for purposes of fanta-
sizing, or a mere hobby. The celebrity uses the fans as a means for income,
popularity, visibility and ‘buzz’. As such, a Kantian ethic of specific impera-
tives is often invoked – fans will often mention to each other that a celebrity
owes them a specific Tweet or gig, especially if it has been a long time since
the celebrity has been in contact. ‘You’re neglecting us’ becomes a common
message, followed by an inevitable debate about the moral obligations and
intentions of the celebrity. Some fans will counter-argue that no such obliga-
tion for continued contact exists, and that it would be somehow less signifi-
cant if the celebrity were to Tweet or post after such a comment, because it
would indicate mixed motivations, such as guilt, rather than a sincere or pure
message.

If the relationships between celebrities and fans have a set of Kantian
duties on the side of the celebrities, they arguably also do on the side of fans.
In the context of paparazzi and tabloid involvement in celebrity lives, fans will
argue with each other over whether they ‘owe’ celebrities a certain amount of
distance and respect. For example, particular fan sites refrain from patronizing
celebrity stalker paparazzi websites, and will not allow ‘stalkerazzi’ photos to
be posted on their fan forums and message boards. The perception is that fans
have a duty to respect the privacy of their chosen celebrity, and that giving
money or advertising revenue to paparazzi is a violation of the fan’s duties to
the celebrity.

In a sense, this culture of mutual duties evolved from a context in which
fans sought to distinguish themselves from stalkers, and ‘stalkerazzi’ provide
a line at which the distinction can be clearly drawn. The good fan is one who
routinely references the celebrity’s need for privacy, and their right to privacy.
The rallying cry of the good fans is ‘We’re just fans, so we can’t really know,
but it certainly is fun to see what will happen next!’ Of course there are a
variety of ways in which this line between good fan and stalker is crossed,
whether accidentally or intentionally. One example is erotomania, in which a
fan suffers from the delusion that the celebrity is not merely sending Tweets,
press releases or status updates online, but that the very actions, words,
gestures, or items appearing in a celebrity’s film or song are a means by which
the celebrity is ‘speaking to’ or ‘communicating with’ the fan. These items are
used as ‘self-referential delusions’ confirming the love relationship. Another
name for this disorder is ‘de Clérambault’s Syndrome’, named after French
psychiatrist Gaëtan Gatian de Clérambault, who was the first to study the
disorder. This syndrome is characterized by an unshakable belief that another
person (in this case, a celebrity) is secretly in love with them (a fan) (Berrios
and Kennedy, p. 385). Such was the case with David Letterman’s stalker,
Margaret Mary Ray, who broke into his home and rearranged his furniture, labouring under the false belief that they were in love and in a relationship (Bruni, p. 45).

The mirror image of the fan suffering from de Clérambault’s Syndrome is the celebrity who is dependent on fan sites and fan message boards as a part of their marketing to the public. Some celebrities have gone so far as to hire professionals to create fan sites for them, or to recruit large numbers of fans as ‘street-teams’. Members of street teams promise to post advertisements of upcoming events, whether on particular message boards, Twitter or Facebook, or advertising local events. Street teams are organized by locations, and contact information for a specific set of fans is immediately available and can be sent out to storm the internet or a specific city with information about upcoming gigs, filming, calls for extras, and so on. A co-dependency can develop between the celebrity and these ‘volunteers’, to the point that the celebrity may actually feel a certain ethical obligation to do specific favours for these fans. These might include prime seats for shows, free premiums (also known as swag), or financial help with website operation costs or travel to location shoots. In a way this perpetuates the mutually beneficial and mutually usury relationship, provided that the fan does not cross a line or assume too much of a relationship.

CYBORG GUARDIAN ANGELS

As Francis Bacon famously said, ‘knowledge is power.’ When Bacon said this, he specifically meant the stockpiling and hoarding of data. Fan site operators and participants often engage in this kind of stockpiling of data on the object of their affection. Paparazzi photographs are collected and catalogued, old news stories are archived, links to news sites and photograph sources are stored and bookmarked. All of this lends itself to the fan’s feeling that they are in a sense ‘guardian angels’ watching over the celebrity’s day-to-day activities and emotional state.

The hyper-reality that fans can construct through the collection of this data is perhaps best described by Donna Haraway’s concept of the cyborg. The cyborg is the current state of the human being in modern times, dependent on technology, a blend of human and computer. Haraway intended her discussion of the cyborg to be an ironic political myth, an analysis of the theoretical and fabricated hybrids of machine and organism. But Haraway describes the cyborg as having ‘no truck with sexuality’, that the cyborg has no ‘origin story’ (of its own).

If Haraway’s cyborg has no sexuality, the cyborg guardian angels on fan sites and social networking sites have a strongly sublimated sexuality. Affection is expressed through collection of data, archiving, and stockpiling tokens rather than physical presence or genuine conversational intimacy. The mediation of the computer, and the fan-friendships that develop in the internet context, are the reinforcement and feedback that keep the cyborg motivated.

Haraway is also concerned with the power relationships of cyborg and world, the possibility that technologically mediated humanity actually becomes a form of control over the world. She is especially concerned with this in terms of military defence, writing that, ‘From one perspective, a cyborg world is about the final imposition of a grid of control on the planet, about the final abstraction embodied in a Star Wars apocalypse waged in the name of defence’ (Haraway, p. 152).
For the fan-celebrity relationship, there are similar issues of control. The information given out by a celebrity regarding their location and their travel plans can result in stalking by certain obsessive fans. Even as the celebrity gives out information to fans so that they can feel ‘in the know’, the celebrity must also modulate what information to give out and to whom. To communicate with security personnel and drivers, the celebrity is increasingly dependent on mobile phones or a Blackberry or iPhone to communicate when a rescue might be needed. In 2007, when a particular actor made an apparent suicide attempt, one blogger named Jabulani Leffall wrote an essay explaining how the celebrity’s life had been affected by technology, and by the need to be ever-reachable by management and fans alike. The celebrity in question is described as having approximately fifteen messages on his phone by early morning, each demanding communication, interviews or personal favours.

Before you can brush your teeth, your BlackBerry, cell, landline or iPhone is buzzing off the hook.

Message one: Your personal assistant.
Message two: Your manager.
Message three: Your business manager.
Message four: Lawyer on the line.
Message five: Your agent’s assistant with your agent on the phone.
Message six: The production office of the company making your latest project.
Message seven: The big studio working with the production company making your latest project.
Message eight: Your publicist.
Message nine: Variety reporter.
Message eleven: Somebody you supposedly met at Cannes or was it Sundance? You have no idea who this person is.
Message twelve: Your relative wants you to put your wayward cousin into the ‘movies out there, so he can be successful like you’.
Message thirteen: Intrepid blogger/reporter/gadfly and Hollywood Schadenfreude writer extraordinaire, Nikki Finke is threatening to write a post detailing why you’re not answering your phones …

Everyone and anyone wants something from you. Subsequently, you’re stepping out into a world where you can’t even go to a urinal without someone saying, ‘hey what’s up baby, I just loved you in Royal Tenenbaums, “Wildcats, pew, pew, pew!”’

Walk down the street and listen to screaming, grown women and uh, men who swoon at the sight of you or worse, mumble like idiots.

(Leffall, p.1)
Information and information technology becomes not merely a commodity, but a necessary augmentation of self, for both celebrity and fan.

ARETIC LUCKY STARS

If we return to the example of *Singin’ in the Rain*, it quickly becomes clear that an Aristotelian approach involving moderation of the appetites is necessary. At first, Kathy Selden disingenuously pretends she does not know who the star, Don Lockwood, is. Her pretence is what makes her special in Don’s eyes. As his friend Cosmo (Danny Kaye) notes, ‘She’s the first girl who hasn’t fallen for your lines since you were four.’ In a world where everyone can Tweet, everyone can take a cellphone picture, the one who does not is the one who gets noticed. The original script included a reference to Kathy’s extreme ‘fangirl’ past (indeed it explains why she is driving so near to the corner where Don’s suit is torn by a group of her fellow fans). But of course the scene in which she admits her tendency to buy the fan magazines and her presidency of Don’s fan club was cut from the film – it would have made her seem too much like a stalker, and it would have been inconsistent with the clear ethical voice she displays in the last half of the film. What makes Kathy Selden an exemplary fan is the way she moderates her desires and lives out the Golden Mean – helping Don Lockwood in saving his film *The Dueling Cavalier*, but intending to end their liaison when it becomes clear that her own career and talents would be misused. Fan-Celebrity relationships on the Internet would benefit from this type of Aristotelian moderation, on the part of both the fan and the celebrity.

REFERENCES


SUGGESTED CITATION

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NOTES
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