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Comparative Analysis

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(ISASCR)

SECONOMICS Consortium

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In this discussion paper series, the Prague *SECONIMICS* team intends to allow the broader academic community to take part in an on-going discussion about the risks and threats, as well as trade-offs, between themselves and security. This research focus stems from the fact that until now, social scientists have primarily studied threats and risks through the perspective of social psychology, conducting so-called "risk assessment" analyses and focusing particularly on the concept of "risk perception." This research thus aims to explore these concepts in order to broaden our understanding of the multivariate study of risks and threats in the social sciences by adding some context-dependent and temporal aspects.

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Executive summary

For this project researchers used an in-depth qualitative comparative analysis of media content. Researchers carried out a comparison of three security issues in ten countries. The issues compared were Stuxnet (which represents cyber terrorism), 3D body scanners (representing security measures against terrorism and organized crime, though with possible negative impact on passengers' health), and CCTV cameras (a security tool which can threaten people´s privacy) To provide relevant cultural and political diversity, three kinds of countries were selected for comparative purposes: old European Union (EU) member states (Germany, Italy, Great Britain, and Spain) new EU member states (the Czech Republic, Slovakia, and Poland), and non-European countries (Mexico, the USA, and Turkey).

Analysis showed that the media and public are aware of the trade-offs between security, privacy and the need to regulate security measures. However, in the countries studied both internal and external security is not neglected as terrorism and organized crime is perceived as looming security threats. In other words, consensus permitting a certain degree of surveillance is necessary. Despite of this fact, newspapers reflected that greater security does not necessarily entail a loss of privacy, and vice versa. In this respect, newspapers fulfilled their function as a platform for critical discussion.

The three security-related topics did not attract the same level of media attention. Newspapers focused more on issues pertaining to CCTV cameras and 3D body scanners, while the least attention was paid to Stuxnet because it was not a technology directly affecting daily life of common people. The United States led the debate about 3D body scanners and Stuxnet, but played only marginal role in the discussion of CCTV cameras. Key factors influencing the discussion of security measures was the past experience of the countries with some kind terrorist attack (the United States, Great Britain and Spain) as well as and the probability of future attacks.

To conclude, security related-issues, surveillance, the right to privacy, and its protection are not clearly defined and static terms. However their perception is influenced by the security context, mass media, cultural variables, laws, and particular context of specific state. Moreover, media plays a key role in the communication of security issues and threats. They are the source of information and significantly influence and shape people´s attitudes about security.

1. Introduction

Work package four - Security and Society – has several objectives for the first two years of the project. First, the work package has a goal of conceptualising security and risk as a social phenomena. Second, it seeks to analyse the mutual interplay of public attitudes and opinions, then identify policy interactions between policy makers, industry (stake holders), and citizens (consumers).

In order to supplement the quantitative analysis of secondary data, and to further strengthen the linkages to the case studies, the Prague Seconomics team organised and successfully implemented the Prague Graduate School in Comparative Qualitative Analysis 2013. The school established a framework for obtaining qualitative data for comparative analysis of risk- and security-related discourses and patterns of communication. This framework will enable the Prague Seconomics team to not only identify effective channels and patterns of communication and risk prevention for relevant target groups, but also generate a unique corpus of comparative data on ten countries over the period of forty month. The interim product is a corpus of almost 3200 articles (2800 in national newspapers and 400 in blogs) pertaining to issues of 3D body scanners (as a case study in airport security), Stuxnet (as a case study in critical infrastructure security), and CCTV camera systems (as a case study in public transport security).

The articles analysed in the study were published between January 2010 and April 2013. Each article was sourced from one of the two most circulated reputable daily newspapers (i.e. mainstream newspapers, excluding the yellow press) in the following countries: the old and the new EU member states of the Czech Republic, Germany, Italy, Poland, Slovakia, Spain, the UK. But also included are non-EU states important in either shaping global discussions of the selected issues, such as the USA, or countries necessary to provide relevant cultural diversity, such as Turkey and Mexico. Additionally, four expert security blogs were selected to provide additional information about the dialogue between the general population and the community of security experts whose voices often appeared in analyzed articls. For the expert blogs, please see Lacina 2014.

The three topics that we included in the analysis didn´t attract the same level of attention among the studied countries. United States was a leading country in the case of 3D body scanners and Stuxnet, setting the pattern of discourse for the rest of the countries we analyzed. On the other hand, in the third analyzed topic, it played only a marginal role. CCTV cameras were the center of much controversy in Poland and Germany. Poland is one of the strongest proponents of of CCTV cameras, while German articles revealed a mainly negatively attitude towards these devices.

Table 1: Comparative Assessment of Salience of Security Measures

Salience / Measure	3D Body scanners	Stuxnet	CCTV cameras
Low salience	Turkey Poland Mexico	Italy Poland Slovakia	US Italy Poland UK Expert blogs

Medium Salience	Czech Republic Slovakia Spain Italy Expert blogs	Czech Republic Spain Turkey	Mexico Spain
High Salience	US UK Germany	US Germany Mexico UK Expert blogs	Turkey Slovakia Czech Republic Germany

Source: SECONOMICS ISASCR

Salience is a term in public opinion, communication, and policy research, originally developed in semiotics. It refers to the relative prominence of a sign. In communication research salience refers to the accessibility of frames (i.e. narrative structures in which information is presented) in (mass) communication.

For the purpose of this study, salience is defined as public perception and reception of security issues, and also more particularly of security measures. For this purpose salience signifies the degree of acceptance (positive salience) and the degree of rejection (negative salience).

In the following figures we offer a comparative preview of the salience of the three selected issues in the ten countries over time.

Graph 1: The Salience of the 3D body scanner issue in the media between 2010 and 2013 (N = number of articles)
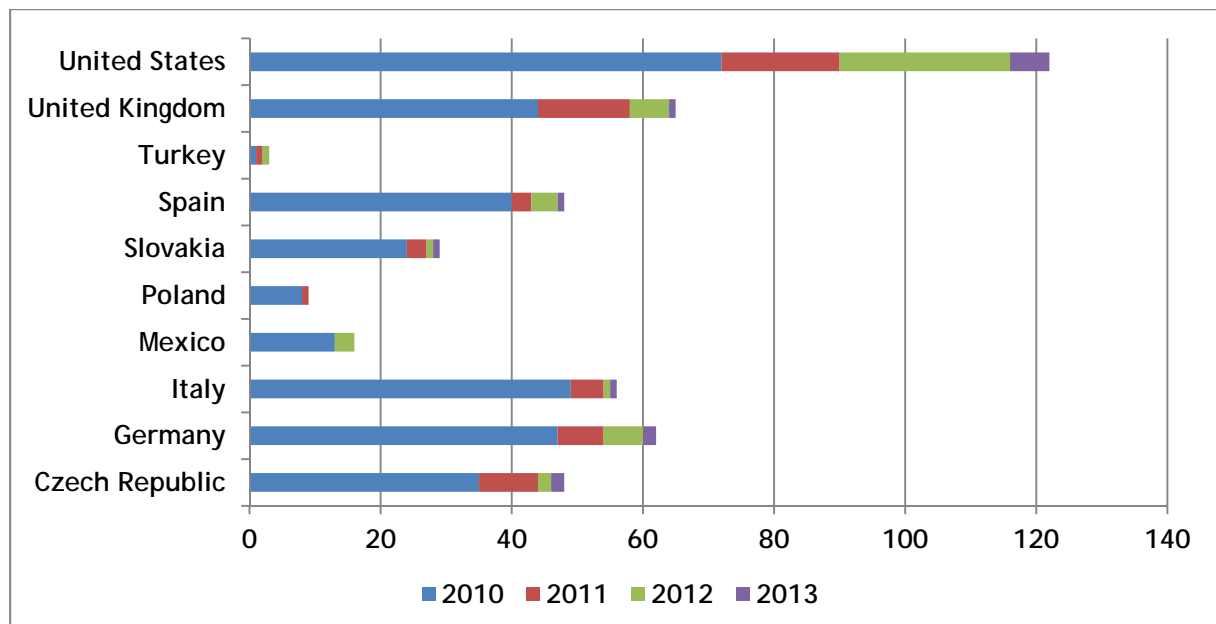
Source: SECONOMICS ISASCR

The corpus of articles on 3D body scanners comprises almost 500 articles. As Graph 1 demonstrates, most articles in this sample came from US media, followed by the

UK and Germany. We can say that the issue of 3D body scanners was most salient in these three countries and least salient in Turkey, Poland, and Mexico. Furthermore, Graph 1 also demonstrates that 3D body scanners were most salient in 2010 but are gradually becoming less salient over time.

Graph 2: The Salience of the Stuxnet issue in the media between 2010 and 2013 (in N = number of articles)

Source: SECONOMICS ISASCR

The corpus of articles on Stuxnet also comprises almost 500 individual articles. As Graph 2 demonstrates, most articles in this sample again came from US media, followed by Germany, Mexico and the UK. We can say that the issue of Stuxnet was most salient in these four countries and least salient in Italy, Poland and Slovakia. Furth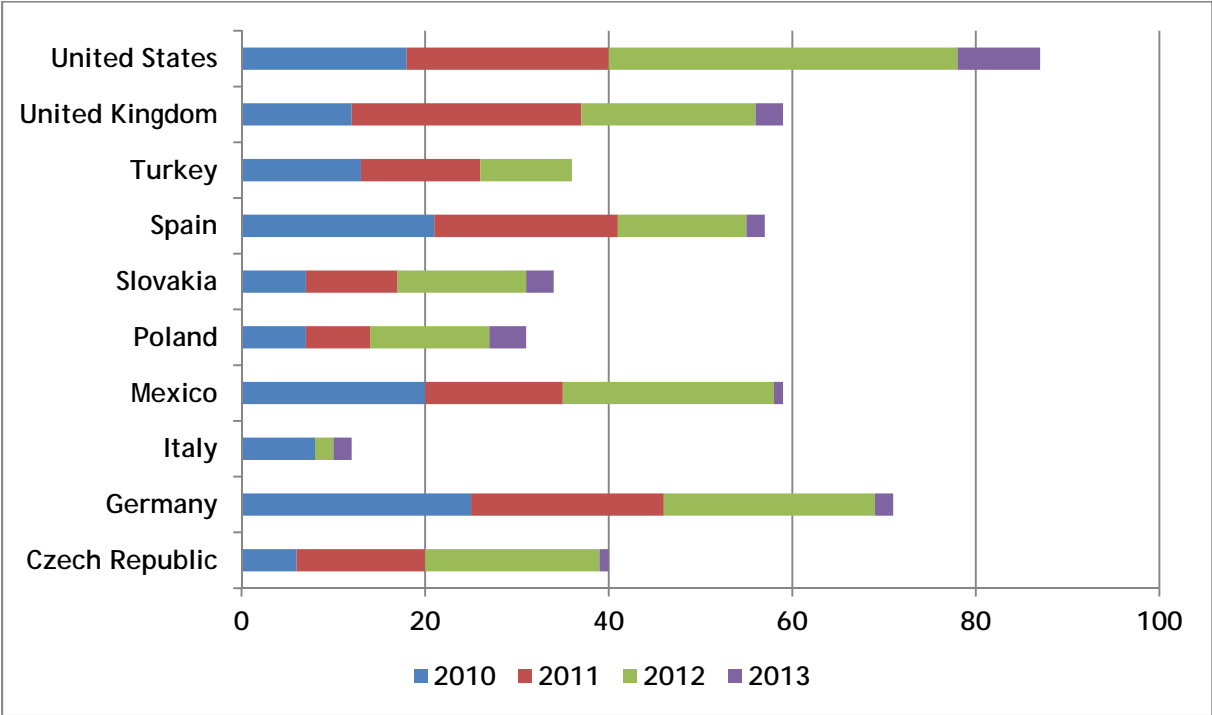ermore, Graph 2 also demonstrates that Stuxnet was most salient in 2012 and remains so over time, with a slight drop in salience in the first four months of 2013.

The corpus of articles on CCTV cameras (Graph 3) is significantly larger than the previous two, and comprises also almost 1900 articles. Furthermore, in Figure 3 Turkey can be clearly identified as an outlier, as it contributes 1000 articles to the overall sample. The saliency of the CCTV cameras in Turkish media is a result of the frequent use of CCTV cameras, as well as its utilization by police during investigations. Nonetheless, even excluding Turkey, CCTV cameras would still remain the most salient issue. As Figure 3 demonstrates, most articles in this sample were identified in Turkish media, followed by Slovakia, the Czech Republic, and Germany. It is also important to note that the selection concentrated on articles referring to the use of CCTV in public transport. This restriction was applied to eliminate the possible inflation of the sample by articles related to the general use of CCTV cameras in criminal investigation. In Graph 3 we also see that the issue was least salient in the US, Italy, Poland, and the UK. Furthermore, Graph

3 also demonstrates that the saliency of the CCTV camera issue is relatively stable over time with subtle growth in 2013.

Graph 3: The Salience of the CCTV camera issue in the media between 2010 and 2013 (in N = number of articles)
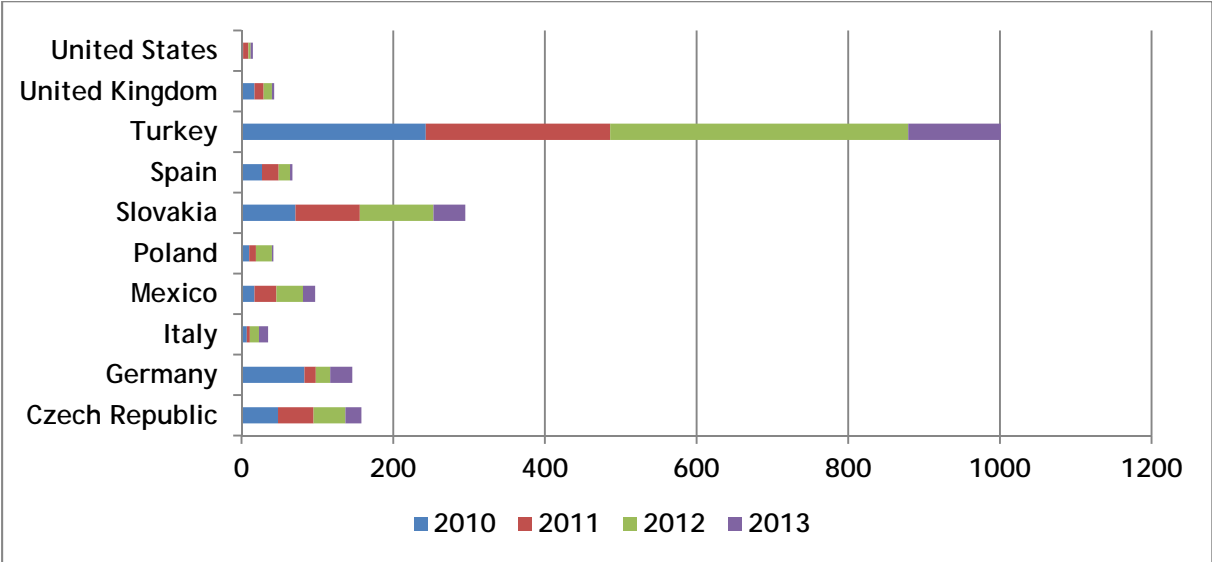
Source: SECONOMICS ISASCR

A cross section of findings is provided in the national reports, in the expert report,[1] and in the comparative report. This last report offers an in-depth descriptive analysis of actors, topics, and justifications over time, including fitting quotations. It also analyses the general trends in the main discussions on each topic. The authors look for prevailing themes, dominant patterns of interaction, and compare the three topics in terms of the intensity and type of debate, as well as the influence of domestic and international contexts.

The comparative analysis is based on national reports and merged data sets. Comparison is done separately for the three case study-based topics in 9 countries. The Turkish articles were collected but for technical reasons it was not possible to perform the in-depth qualitative analysis of the Turkish press.

2. Methodology

In the study of risk perception, an analysis of quantitative data offers important insights into the general overview of citizens´ perceptions and attitudes towards risk and security, as well as attitudes towards the various trade-offs. However, given the limited availability of relevant data that is current, we outline an alternative strategy in the conclusions. This strategy allows us to obtain our own data directly related to the research needs of the SECONOMICS project. Media

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[1]The analysis of blogs is not national, but rather international, as four English speaking blogs with no particular national perspective were selected according to their relevance to the security experts.

analysis is particularly useful because communication channels and patterns between policy makers, stake holders, and citizens in the field of risk and security is currently under-researched, and the media offers a good basis for comparative analysis of the topic. Identification of effective channels and patterns of communication and risk prevention for relevant target groups will thus provide an important scientific and practical contribution to the field.

Based on a series of consultations, we identified three themes that are currently salient in the media and relevant for comparative qualitative analysis (3D body scanners, Stuxnet, and CCTV camera systems). Relevant articles published over a period of 40 months between January 2010 and April 2013 were deemed satisfactory to cover the recent developments in these topics. Criteria for country selection included EU member states (both new and old, with priority given to countries relevant to the case studies topics – the Czech Republic, Germany, Italy, Poland, Slovakia, Spain, the UK) as well as non-EU states important in either shaping the global discussions of the selected issues (the USA) or necessary to provide relevant cultural diversity (Mexico and Turkey).

In all countries one left-wing and one right-wing media outlet was selected. In the Spanish case one national and one Catalonian daily was selected, because the case study of public transportation occurs in Barcelona. In the following figures we offer the first comparative preview of the saliency of the three selected issues in the ten countries over time.

Table 2: Overview of selected media outlews

Country	Media
Czech Republic	Mladá fronta Dnes, Právo
Germany	Süddeutsche Zeitung, Franfurter Allgemeine
Great Britain	The Telegraph and The Guardian
Italy	De la Republika, Il Giornalle
Mexiko	La Jordana, La Reforma
Poland	Gazeta Wyborcza, Rzeczpospolita
Slovakia	SME, Pravda
Spain	El Pais, La Vanguardia
Turkey	TIME (ZAMAN), SPOKESMAN (SOZCU)
USA	The New York Times, The Wall Street Journal
Blogs	The Register; HITB – Hack in the Box; RW – Roger-Wilco; Bemosa

The Prague SECONOMICS team elaborated three coding schemes (one for each topic - 3D body scanners, Stuxnet, and CCTV cameras). The team tested and finalized the schemes over several rounds of trials on all selected countries. The role of the coding scheme as a research tool is twofold – first, it provides a structure and guidelines for the analysis, and second, it ensures comparability of the individual national reports.

The intercoder reliability oscillated between 80 and 90%, which from a methodological perspective is an excellent result in international and multicultural comparative research. The results of the intercoder reliability test were extensively discussed within the SECONOMICS expert group and, when necessary, also with individual coders whose coding stood as outliers. This tool proved to be crucial in providing an understanding of the general logic of qualitative comparative analysis, gaining insight into the coded material as well as the ability to fully grasp the meaning behind the individual codes.

Our main task was to conceptualise security and risk as a social phenomenon and to analyse their mutual interplay in public opinion and attitudes; and to identify policy interactions between policy makers, industry (stake holders) and citizens (consumers). We have used the method of comparative qualitative analysis as a tool for obtaining qualitative data for comparative analysis of risk and security related discourses and patterns of communication. This tool enabled us to identify effective channels and patterns of communication and risk prevention for relevant target groups, but also generate a unique corpus of comparative data on nine countries over a forty-month period. The interim product is a corpus of almost 3200 articles related to issues of 3D body scanners, Stuxnet, and CCTV camera systems.

Both during the trials and the main coding period, the minimum discursive elements of a coded statement included the following (1) Actors: this included a determination of which actors were taking part in the communication (both in terms of origin and type) and what were the dominant patterns of interaction among them; (2) Topics: an account of how the discussion of each topic was structured by choice of, or focus on specific subject matter; (3) Argumentative strategies: a description of the ways in which statements were structured (definitive, evaluative, and advocative strategies[2]) with a focus on the positive and negative aspects of evaluative and advocative statements; (4) Motivations and justifications: an analysis of major recognized motives (providing an answer to the question of why a certain statement is used and how it is validated) brought to the fore or denied by dominant actors, with special attention paid to ideas about security, privacy and freedom.

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[2]Three argumentative categories are recognized and conceptualised following Dryzek and Berejikan: (1) Definitive: focused on defining the meaning of terms; (2) Evaluative: evaluation of positive or negative statement of worth; (3) Advocative: determining the desirability/non-desirability of given elements (Dryzek Berejikan 1993).

3. Media landscape in countries covered by research

The national reports clearly demonstrated that one must be aware of existing ties between political actors and the media, as these ties have important implications for any media analysis. Although our sample of countries is highly diverse and includes Central European (the Czech Republic, Slovakia, Poland) and West European countries (Germany, Italy, Spain, the United Kingdom), together with two overseas countries (the USA and Mexico), we can observe some global commonalities in the media sector, as well as some diversity. In particular, the analyzed sample and time period point towards some major changes in ownership structures and regulatory frameworks. The main focus here is on the press and its online versions, which were used in the national reports.

The global economic downturn of the past five years has hit the media sector hard. Profit margins are much lower than in the 1990s, and several news outlets have been forced to lay off investigative and international journalists, reduce output, and limit the number of foreign offices. All major British newspapers have experienced a drop in circulation over the past three years. Even the BBC has had to reduce its famous global coverage. As early as in 2010, the Central and East European countries had lost 30% to 60% of their national income (Open Society Fund 2010). As Hronešová and Caulfield (2013: 15) noted, "one of the strategies... to lower costs has become multi-skilling of staff and cutting specialist correspondents, foreign bureaus and investigative journalism, which has only reinforced the trend of journalistic dumbing down." News coverage has focused on informative reporting rather than large investigative and analytical pieces, which are more costly and require a larger pool of staff. Media content turned towards entertainment and tabloid-style news for commercial purposes. This has led to a negative trend in the media referred to as "infotainment," i.e. the presentation of news information in an entertaining and more appealing form (see Beláková 2013a). More importantly, media independence has suffered from an increased dependency on governments and large business to support their reporting. Political and business interests have crept into media content, especially in countries which were hit particularly hard by the crisis. On the positive side, the latest developments in media have also seen a great technologization of news reporting and a preference for online platforms due to their efficiency, accessibility, and lower cost (Hronešová and Caulfield 2013).

While stressing these underlying factors and global pressures on the media sector, the national case studies included in the national media analyses highlight several regional and national characteristics. The three Central European countries – Poland, Slovakia and the Czech Republic – score high in terms of press freedom in the *Reporters without Borders* 2013 ranking, with the Czech Republic performing the best out of all analyzed countries (see Table 3). Although freedom of the press and the right to information are constitutionally anchored, and the press is regulated by state press acts, the latest developments have seen the media especially vulnerable to financial pressures from business and indirect political meddling. Newspapers in the region are in the hands of large media companies such as Mafra in the Czech Republic, Agora in Poland, and Media Group in Slovakia.

Table 3: World Freedom of Press 2013

Country	Rating	World Rank
Czech Republic	10.17	16
Germany	10.24	17
Poland	13.11	22
Slovakia	13.25	23
United Kingdom	16.89	29
United States	18.22	32
Spain	20.50	36
Italy	26.11	57
Mexico	45.30	153

Sources: *World Press Freedom 2013, Reporters without Borders*

As a consequence of the financial crunch, foreign investors left the region and media conglomerates were bought by local businessmen with diverse business interests. The departure of foreign business has undermined the independence as well as the quality of the press. As both Beláková (2013a) and Sojka (2013) note, business-media elites have used the media to advance their own business or political interests. In addition, self-censorship may also be present, but its prevelence is difficult to establish as it is driven by the fear of losing a job in very precarious times (see Gawrecká 2013). In the Czech Republic, the so-called *Muzzle Law* of 2009[3] undermined the constitutional right to inform and be informed and introduced strict limits on the freedom of speech. Only after a sever criticism was the law amended in 2011 and today excludes cases of great public interest (such as political corruption). In Slovakia, the media has been negatively affected by politically motivated libel lawsuits and the distribution of state advertising (Beláková 2013a). As Beláková noted (Beláková 2013a: 10), "since by 2010 virtually every national daily had been involved in some libel case, media professionals felt that the threat of libel was shaping what was published." In a similar fashion, Polish media has been politically polarized since the 1989 transformations, with occasional direct interference of major political actors, as documented by Sojka (2013).

As for West European countries, Italian media is certainly in the most precarious situation. De Gramatica's report clearly shows how media ownership in Italy directly determines what type of news can or cannot be published. Yet the situation is different than in Central Europe, as "the Italian media landscape breaks down into a myriad of partial, but not insignificant, holdings" (de Gramatica 2013: 10). Yet one actor dominates the Italian media sector, the former Prime Minister Silvio Berlusconi. Berlusconi's media empire has turned Italian public broadcasters into a branch of his political apparatus, which was apparent during every round of

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[3]The so-called *Muzzle Law,* Act 52/2009 Coll., amending Act No. 141/1961 Coll., introduced a ban on publishing any account from police wiretapping in newspapers, the Internet, TV, or radio.

elections. The newspaper *Il Giornale* has been particularly supportive of Berlusconi's *Forza Italia.* Due to these open political influences, Italian press freedom is usually assessed very poorly, which is reflected in all independent rankings.

The situation in Spain is similar to some extent. As Pereira-Puga and Hronešová (2013) noted, "although media freedom and independence has been respected in practice since the first democratic opening in 1975, the majority of media [outlets] are economically dependent on the state and close ties with some political parties indirectly influence news reporting". Reporters without Borders have often criticized the ruling Popular Party for interfering in the appointment of editorial boards of the main Spanish media outlets. Similar to the Central European situation, Spain has also undergone some serious media ownership consolidation, whereby the main media outlets are now in the hands of only a few holdings. Post-1975 Spanish newspapers such as *El Pais* have a very strong reputation, though, and, despite their clear social democratic position, are considered to be highly professional.

Germany and the United Kingdom present a different media landscape due to their long-standing journalistic traditions. Their media markets are also large and diverse, reaching beyond their borders. As Nitschke (2013) noted, Germany has over 300 dailies, 30 weeklies and over 10,000 magazines, including one of the most respect weeklies in the world, *Der Spiegel.* The United Kingdom was in fact the pioneer of journalism as we know it today. Britain was also the first country to develop a "public sphere where public opinion can be formed (Hronešová and Caulfield 2013). Despite high journalistic standards in both countries, there are two caveats. First, due to the stricter security measures in the decade following 9/11, both countries have adopted legislation curbing journalistic freedoms. The German Terrorist Act of 2009 gave the police greater power to conduct covert surveillance. In the UK, journalists are not only required to reveal sources and turn over material important for state security, but the 2006 Terrorism Act criminalizes speech inciting terrorist actions, which can be a very difficult line to draw, in certain cases. Secondly, in Germany and the United Kingdom there are established links between high politics and media owners and executives, which occasionally translates into influence on news coverage.

The British case is also interesting for the unique self- regulatory nature of the British press. The analysis in the British national report shows that until recently an independent commission oversaw the regulatory structure in the UK. However, since the 2011 phone-hacking scandal at the weekly *News of the World,* the British government launched a public inquiry into the general regulatory framework, which is currently undergoing major reforms. The scandal in fact uncovered an important flaw in British media ownership regulations, as private media outlets have fallen into the hands of only a few companies with political interests. Each principle daily has a somewhat different ownership structure, though *The Guardian* has the most transparent one. The management of the paper is answerable only to its owners (Scott Trust Ltd.), and conducts and external annual audit. The paper also has an independent ombudsman, who is in charge of complaints.

In contrast to the direct corporate and political influence on the media in Italy and

Spain, the US media landscape has been assessed as one of the most politically independent, and most commercial, in the world (Beláková 2013b). Media freedom is one of the anchors of the US constitutional system and in the past the courts have often declared that they are protected from libel and defamation suits from public figures. As the press is predominantly in the hands of private companies, the news sector is driven by commercial interests. This also leads to only a limited diversity of provided news as the focus is on newswire reports. The financial crisis had a serious negative impact on investigative journalism in a similar fashion as elsewhere. However, it has also led to a change in ownership structures. Previously, individual owners (mostly influential families) owned main news outlets, such as the Wall Street Jornal and the Washington Post. In the aftermath of the financial downfall, though, large corporations and tycoons have started to bail out media outlets in financial difficulties. Most notably, the Amazon founder Jeff Bozos bought Washington Post in 2013.

Mexico, on the other hand, is dramatically different from all other countries. Mexico is a dangerous place to be a journalist. Due to the ongoing war between the state and drug barons, tens of journalists get killed every year. Moreover, political censorship is omnipresent. It was especially strong during the controversial July 2012 elections, which brought the Institutional Revolutionary Party back to power (Vamberová 2013). Citing the Reporters without Borders 2013 report, Vamberová highlights the low level of journalistic freedoms as well as threats journalists face: "They are threatened and murdered by organized crime or corrupt officials with impunity. The resulting climate of fear leads to self-censorship and undermines freedom of information" (Vamberová 2013). In terms of quality of the press, Mexico is dominated by the so called red press, i.e. "news focusing on assassinations, kidnappings, and drug crimes" (Ibid.). Mexico also faces a high concentration of media ownership in the hands of only a few influential businessmen such, as Mario Vázquez Raña.

The global economic malaise of the past few years has had a clearly negative impact on the media sector in the studied countries. Ownership has slowly shifted into the hands of businessmen and tycoons, and ownership restrictions have relaxed limits on market shares (with the exception of the UK).[4] The quality of the produced news and analyses has also suffered under financial constraints. Journalists have faced unprecedented financial challenges, whereby they often had to compromise their journalistic ethics for commercial profit. This has resulted in growing self-censorship, which is difficult to measure. In addition, there has been a trend of political meddling into editorial policies and the news content as media owners often have close ties to powerful political actors. There is a clear difference in terms of freedom of the press and the quality of journalism across the studied countries, though. While Central European media score highly on media freedoms, the quality of news reporting is much lower, and informative, rather than analytical, pieces dominate. On the other hand, both the United Kingdom and the United States provide investigative and analytical news reporting at the highest professional journalistic standards. Italy and Spain struggle with the influence of businesses and politics on media content, but still offer diversified and quality reporting. Lastly, Mexico is a clear outlier in the set of analyzed countries and was even assessed as the most dangerous country for journalists in the western

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[4]Table 2 provides a general overview of newspaper ownership structures in the coded countries in 2013.

hemisphere, mainly due to the on-going cartel wars (Reporters without Borders 2013).

4. The domestic and international context

In recent years, security threats such as terrorist attacks, global organized crime, and cyber attacks have come to the forefront of the world attention, creating a new setting for worldwide security challenges. As analyzed in the SECONOMICS country reports, the 21st century presents post-modern challenges and risks, a product of the latest technological developments and a new, virtual world of crime. Terrorist attacks and intelligence leaks, as well as direct or indirect participation in global or national cyber-attacks, have significantly influenced the latest policy priorities in the field of national security. The protracted financial crisis has further intensified concerns for public safety as crime is expected to grow during times of economic malaise. These developments have been reflected in national security concerns and strategies[5] of all studied countries, which have reacted by adopting new security measures and legislation. In the studied period in 2013, a series of high-profile cases related to leaks of top-secret intelligence data have questioned the legality of security practices applied by national governments. These eye-opening events have intensified debates about nation intelligence services and the powers they hold over the public. Whistleblowers like Bradley Manning and Edward Snowden, as well as the Wikileaks founder Julian Assange, have revealed the scope of the secretive intrusions of the state into the private lives of their citizens, usually justified by the war on terror and carried out with the justification of counter-terrorism. As indicated in the individual country reports, negative perceptions of security and the question of who controls the controllers have gone hand in hand with debates about the need for increased protection from global crime.

In view of these global events and taken into account the domestic political and economic developments, each of the studied countries has prioritized a specific aspect of its national security. Countries which are generally more active on the international scene or have had a previous experience with domestic and international terrorism are generally more exposed to (and hence concerned about) potential terrorist attacks. Such countries (the UK, the US, Spain, Germany) prioritized airport security in the form of body scanners and intensified CCTV coverage (Nitschke 2013). Surveillance and improved transportation security measures have been on top of the governmental priorities, especially since the 9/11 attacks in New York City and the 7/7 2005 attacks in London. The current trend towards installing more surveillance systems and scanning devices in public spaces have chosen invasive security devices such as the 3D body scanners at the cost of intrusions into privacy. Countries dealing with large-scale organized crime, such as Mexico, which finds itself in the midst of a drug war, have also been strengthening their surveillance capacities (Vamberová 2013).[6]

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[5] Among the studied countries Italy is the only one with no clear security strategy (see de Gramatica 2013).
[6] Since 2006, an estimate of 40,000 to 70,000 people have died during the drug war (Vamberová 2013).

On the contrary, in countries with no real danger of a terrorist attack by international extremist groups, there is low policy interest in advanced and costly security devices such as full body scanners. Although some countries in Central Europe, such as Poland and the Czech Republic, have become part of the global war on terror by contributing their soldiers to military actions, the governmental assessment of potential terrorist risk is very low (see Sojka 2013). Nonetheless, surveillance is also very topical for reasons of improving overall public safety – especially in capitals and transportation centers. Though for different reasons, concerns for national and public security have thus in the studied period ran very high in all studied countries.

After the terrorist attacks of the last two decades, a series of new policy approaches have been introduced which fall within the scope of the three studied topics of this project. The 9/11 terrorist attacks in New York and especially the Christmas Day 2009 bomb attempt on a Northwest Airlines flight have shaped US security policies in a significant way. As Beláková (2013b) noted, the failure of the US intelligence to act pre-emptively during the 2009 bomb attempt "triggered a fierce discussion among lawmakers, authorities, experts, and advocacy groups about air travel security measures." In Europe, the 2004 Madrid train bombing and the July 7, 2005 attack in central London provided evidence that after 9/11 terrorism is a global, rather than domestic issue, as it used to be in the past in the UK (IRA) and Spain (ETA), and it merits global strategies and approaches (Pereira-Puga and Hronešová 2013). As documented in the report by Nitschke (2013), Germany has successfully prevented at least seven terrorist attempts in the past decade. Italy experienced its last terrorist attempt in 2002, but the death of Italian soldiers due to a bomb attack in 2010 in Afghanistan also led the government to introduce transport security devices (de Gramatica 2013).

These attempts across the studied countries in Western Europe and overseas have intensified calls for a transnational counter-terrorism strategy. In particular, cooperation in the field of transport and airport security has increased. The so-called multi-layered approach to security was developed by the US Department of Homeland Security and its Transportation Security Administration, and included "increased sharing of intelligence and boarding pass information, the widespread use of body scanners, officers monitoring human behavior [*sic*] in airports and closer relationships with airport officials around the world" (Beláková 2013b). Anti-terrorism databases have been created in Germany and other countries, sharing information about main terrorist groups across the world (Nitschke 2013). In the UK as well as in the US, the previously mentioned full body scanners were introduced at airports (Hronešová and Caulfield 2013). The scanners were believed to improve security in aviation by detecting liquids and non-metallic objects. However, their introduction stirred some religious as well as human rights groups since the scanners virtually stripped passengers naked. Their invasive nature and the consequences for human dignity and intimacy of the scanners (see Nitschke 2013), as well as their potential health hazards were discussed by the European Parliament in 2010. So far, neither a global nor a European position on the application of these devices has been adopted.

Furthermore, the installation of monitoring devices has significantly increased in the last two decades. In the US, the number of CCTVs had increased by

approximately 30 million from 2001 to 2011 (Beláková 2013b). Out of all the studied countries, Great Britain has the highest number of closed-circuit television cameras per person. According to the British Security Industry Authority, 5.9 million CCTVs have been installed in the country since the 1980s (Hronešová and Caulfield 2013). That is why the UK report has been titled "Xanadu of surveillance." Similarly to the body scanners, the main topic of discussion concerning the introduction of CCTVs has been their intrusive nature and the potential consequences of privacy breaches. Such debates were most prominent in the US and the UK but have often been stiffled by claims about their alleged benefits for general safety. For the sake of greater public safety, stricter security measures have been generally accepted by the public. As reported in the UK national report for this project, "from the initial outrage at living in 'one nation under CCTV', watched by the Orwellian 'Big Brother', CCTV has become a point of ridicule, mockery and humour" (Hronešová and Caulfield 2013: 7). Similarly, as shown by Sojka (2013: 7) for the post-communist part of Europe, "CCTV cameras have become in a very short time a social status symbol and constitute an inseparable part of the post-1989 modernization processes." In the Slovakian case, Beláková (2013a) argues that the relatively high occurrence of private surveillance was due to the fact that CCTV in private homes has become trendy in the country and a sign of social status.

The main pro-CCTV argument used in the past two decades has indeed been the decreasing criminality rate around the world, despite the looming economic malaise. CCTV footage has generally been used to solve crimes and deter further crime. As Beláková (2013b: 25) noted, "[t]echnological advancements, including surveillance equipment such as CCTV cameras, were thought by some to have contributed to the downward trend in crime statistics." However, not all analysts agree with this assessment, arguing along socio-demographic lines, rather than changes in crime-prevention policies (see Hronešová and Caulfield 2013). Although the link between increased usage of surveillance systems and lower criminality rates worldwide has still not been confirmed (see Beláková 2013b and Hronešová and Caulfield 2013), it is clear that CCTV can be used as a good mechanism for solving crimes and identifying perpetrators. Immediately following the studied period, on 15 April 2013, an improvised bomb exploded by the finishing line of the Boston Marathon, killing 13 people and injuring over 260. Surveillance footage, as well as private videos from smartphones, was used during the following (and successful) manhunt for the suspects. In this respect, surveillance footage can rapidly increase the time required to solve a crime and find the perpetrators (see Pereira-Puga and Hronešová 2013).

Recently, cyber crime has become a common high-volume crime in the UK, often outnumbering burglaries and robberies (Hronešová and Caulfield 2013). Cyber crime uses information systems and technology to commit extortion, identity theft, espionage, or even to paralyze critical infrastructure. As analyzed in this project, in June 2010 the USA and Israel developed a computer virus to interfere with uranium enrichment in the Iranian nuclear facility at Natanz, opening a new era of cyber warfare. Stuxnet was a highly sophisticated piece of malware and targeted a very particular section of the Iranian nuclear facility. The reason why Stuxnet has shaken public perceptions of cyber security is that it was unprecedented in its scope and effectiveness. As a highly sophisticated weapon, it was able to penetrate into the Iranian nuclear facility in a quasi-autonomous fashion (see Beláková

2013b). Stuxnet has been only one among many recent cyber attacks, though it has certainly been the most destructive one so far. In response to these developments, the British Government released a National Security Strategy and Strategic Defence and Security Review in October 2010 and devoted over £650 million to increase cyber security (Hronešová and Caulfield 2013). Meanwhile, in the US network intrusions were widely considered to be one of the most serious potential national security challenges in 2012 and Congressed passed the Cyber Intelligence Sharing and Protection Act, in an effort to protect private computers (see Beláková 2013b).

The global threat of terrorist attacks and cybercrime also led to the adoption of new legislation. This trend was especially strong in the United Kingdom and the United States. The British Terrorism Act of 2006, the Counter-Terrorism Act of 2008, and the Terrorism Prevention and Investigation Measures Act of 2011 introduced strict measures and zero tolerance towards any extremist views which could potentially lead to violent terrorist acts (Hronešová and Caulfield 2013). Even countries running a smaller risk of terrorism have adopted new measures. Although "terrorism does not represent a threat to the population" in Italy, the government adopted new anti-terrorism legislation in 2005 (de Gramatica 2013: 14). Stricter laws have inspired a counter-trend in regulating the intrusive nature of monitoring systems, which have recently started to be regulated in some countries such as Slovakia and Spain (see Beláková 2013a, Pereira-Puga and Hronešova 2013). In all European countries studied, CCTV footage is strictly limited and may be kept only for a certain period of time and is to be used only for the purposes of criminal investigation. The weak rule-of-law in Mexico, though, allows for misuse of the footage (Vamberová 2013). The legal repercussions of the new security risks have thus combined both increasingly stricter laws with a growing concern about arbitrary nature of state intrusions into privacy.

In 2013, the countries studied have been influenced both by domestic political developments, and by domestic crime as well as international political developments, especially related to the ongoing military actions in Afghanistan and Iraq. In the aftermath of repeated terrorist attacks, law-enforcement authorities and politicians have periodically called for the introduction of more advanced surveillance technologies, including face recognition scanners and full body imaging. Even in countries with lower exposure to terrorism, concerns about the spectre of rising crime following the economic crisis, as well as the global emergence of cybercrime, have precipitated stricter security measures. It can be expected that post-modern security risks will only intensify with advancing modern technologies. As a consequence, a growing concern for the respect of privacy and intimacy – both physically and online – will require adequate legal response from individual states.

5. Comparative analysis
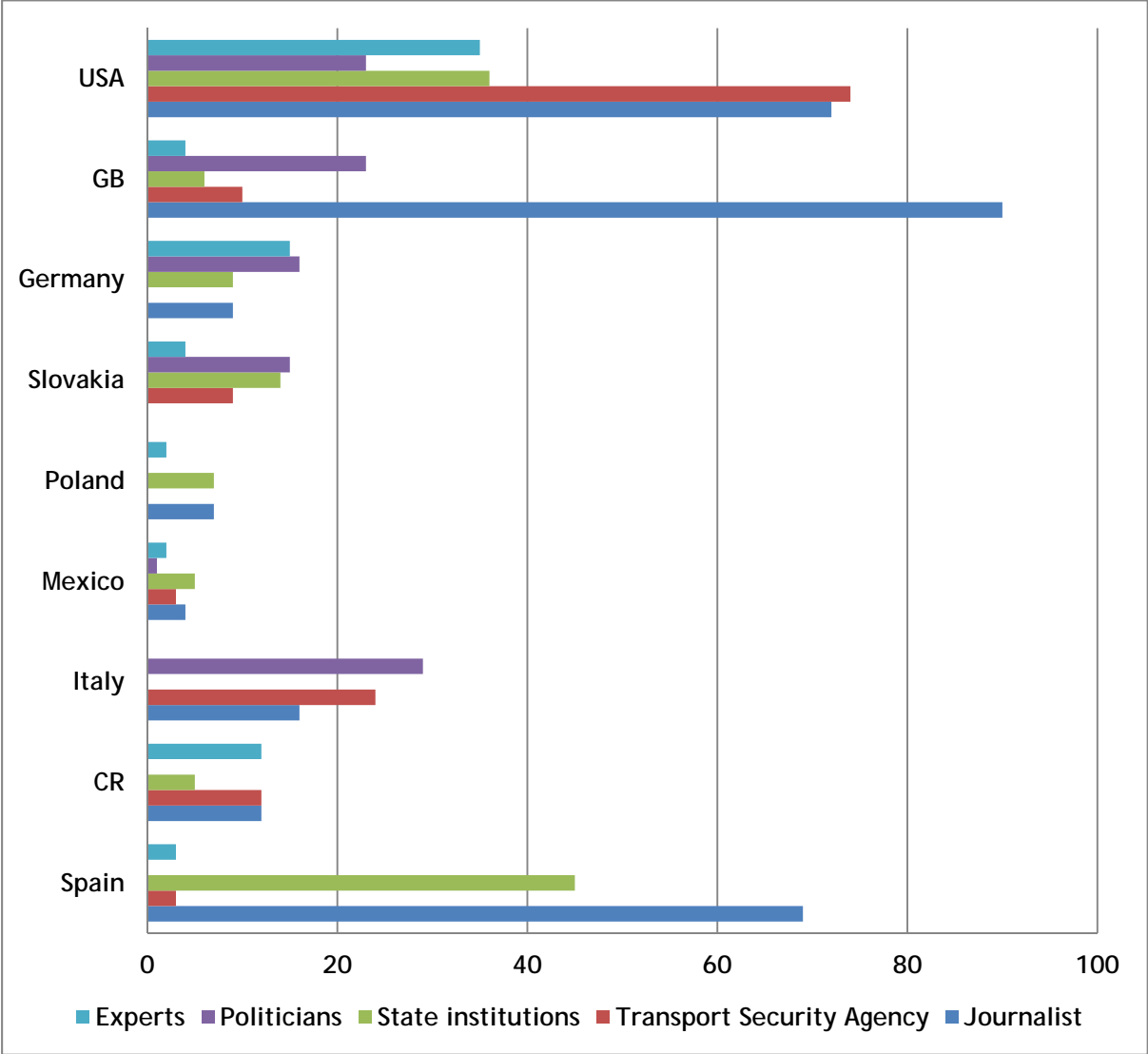
5.1 3D body scanners

5.1.1 The most salient actors and argumentative strategies related to the 3D body scanners

The debate about 3D body scanners in the selected countries can be simplified in the same manner as the debate in the USA over the security following the attempted terrorist attack on a plane to Detroit in 2009. The rest of the countries reacted mostly to the events happening in the US and bring their own agenda to the developments. Among the European countries the topic has not developed much. The UK, Netherlands, and Italy are supporters of this technology. The remaining analyzed countries evaluate it rather negatively. Despite these differences, actors' tend to divide into similar camps in each country. "Transport security agencies" and "politicians" argue in favour of the scanners. "Passengers," "advocacy groups," and "experts" argue against it. Only Italy stands as an exception to this trend. There "passengers" surprisingly seem to be very much in favour of the scanners. As a result, the Italian debate is mainly framed by "politicians."

The development of the actors over time follows similar trends in all the analyzed countries. In countries that didn´t develop the debate as much, namely Slovakia, Poland, Spain, and partly the Czech Republic, we observe the use of mostly informative and neutral argumentation styles. Here the actors are mostly international and we cannot observe much of the national discourse. The remaining countries, though, provide some distinct debates, allowing us to draw some conclusions about their position. The strongest actor in the 3D body scanners field is the United States, where the 3D body scanner controversy involved the most attention of all three analyzed topics. However, an interesting debate about its use has developed in Italy, Germany, and Great Britain as well. In the USA the topic was settled. There is strong support for "government" and the "transportation security administration" (TSA) and the introduction of body scanners. Immediately after their implementation many other groups of actors joined the debate in the media to support or oppose them. There were strong voices of "passengers," "experts," and "civil society groups" raising questions about health and privacy issues. As a result the "government" and TSA had to respond to these concerns and find justifications for their actions in order to make their actions legitimate in the eyes of public. Other countries that developed a discussion react primarily to the US events before developing a similar debate within their own national contexts. Among the EU countries the biggest proponents of 3D body scanners are Italy, Great Britain, and Netherlands, while other countries remain skeptical. Within the EU the topic remains in a state of discussion. Generally we can say that the number and diversification of actors involved in this issue increases over time as more groups join the discussion. The dynamic of the whole debate is also interesting. Almost all of the articles were published in a relatively short period after the discussion had started and then the topic left the discourse again. The curve of

public support for the installation of the security measures would follow the same trend as the level of perceived threats, which increases rapidly after an accident or attack, but it tends to wane as quickly as it appeared (Mansfeldová and Guasti 2013).

Graph 4: Overview of the top 5 actors in articles about 3D body scanners

Source: SECONOMICS ISASCR, based on Table 4

Table 4: Overview of the most important actors in articles about 3D body scanners, 2010-2013

Actors	E	CZ	I	MEX	PL	SK	D	GB	USA	Total
	No.	No.	No.	No.	No.	No.	No.	No.	No.	
Institutions	0	5	0	1	0	4	0	0	16	26
State institutions	45	5	0	5	7	14	9	6	36	127
President	8	0	0	0	0	0	0	2	2	12
Politicians	0	0	29	1	0	15	16	23	23	107
Transport Company	0	0	7	1	0	0	0	2	0	10

	E	CZ	I	MEX	PL	SK	D	GB	USA	Total
Police	0	0	0	0	0	0	8	0	0	8
Transport Security Agency	3	12	24	3	0	9	0	10	74	135
Private company	1	11	0	2	0	6	0	0	19	39
Transportation Company	1	0	0	0	2	3	0	7	28	41
Advocacy Group/civil society	0	0	0	2	2	3	5	25	17	54
Journalist	69	12	16	4	7	0	9	90	72	279
Passengers	5	6	0	4	0	6	2	4	34	61
Scanners	0	4	0	0	0	8	12	1	11	36
Experts	3	12	0	2	2	4	15	4	35	77
Activists	4	4	0	0	3	0	0	0	0	11
Others	1	0	0	1	1	3	0	1	19	26
State (s)	0	4	7	3	3	21	0	0	10	48
Total	140	75	83	29	27	96	76	175	396	

Source: SECONOMICS ISASCR
Note: The top 5 actors in each country are marked in yellow

Table 5: Overview of argumentative strategies in the articles about 3D body scanners

Argumentative strategies	E	CZ	I	MEX	PL	SK	D	GB	USA
definitive	110	62	70	16	15	66	29	149	174
evaluative	16	15	38	16	11	14	56	31	169
advocative	11	0	15	4	2	15	1	1	40
Total	137	77	123	36	28	95	86	181	383

Source: SECONOMICS ISASCR

Table 6: Overview of argument direction in the articles about 3D body scanners

Directions of argument	E	CZ	I	MEX	PL	SK	D	GB	USA
positive	11	2	37	7	6	7	14	5	80
negative	17	20	20	7	7	28	40	27	123
neutral	9	55	66	22	15	60	32	149	180
Total	37	77	123	36	28	95	86	181	383

Source: SECONOMICS ISASCR

In the United States the debate over 3D body scanners is the most developed. The articles are filled with different actors providing statements (see Graph 4). In a similar number of articles there are far more actors coded in the US than in other analyzed countries. If we take a look at Table 5, we can see that the US articles contained the largest number of argumentative strategies of all the selected countries. The number of evaluative strategies (169 codes) almost reaches the number of definitive strategies (174 codes) and there are quite a high number of advocative strategies as well (40 codes). It shows us that the debate is not presented superficially as a list of facts. Rather there are many voices and opinions presented in the field. The biggest distribution among the actors is also found in the US. The total number of 396 codes was divided between 14 different categories

of actors (Table 4).

Rather than talking about the topic in other countries, discussion of 3D body scanners also primarily focuses on them within the US context, as can be seen when considering the origin of actors. In the US the actors coded in the articles were 89% domestic (Beláková 2013b), while in other countries international actors dominated in the debate.

The main actor providing statements about 3D body scanners in the US was "Transportation Security Administration" (TSA), which is the institution responsible for introducing the full body scanners at American airports. "The 3D body controversy in the US newspapers revolved around the 'backscatter' type of scanners that the TSA wanted to introduce at US airports in increasing numbers after the failed terrorist bomb attack from Christmas Day 2009" (Beláková 2013b: 32). The second most important actors with almost the same number of codes were "journalists" explaining the topic to the public. We could also see inputs from "passengers" who were divided almost equally between supporters and critics. The "passenger's" opinions are an important entry here: "Passengers who had experienced the scanners were often dissatisfied with the quality of service. They described scenes of confusion, undignified situations with security staff behaving in a bullish way, making an impression that passengers could not refuse to go through a scan, or even suspicious selection criteria applied by airport screeners" (Beláková 2013b: 35).

The same space given to "passengers" was given to "experts" who would talk mostly about health issues in connection to the scanners and to various state institutions mostly advocating the use of body scanners for the sake of security. "The biggest concerns of the scanner critics were potential health risks, privacy issues linked to the quality of service provided at airports, and even doubts about the ability of the scanners to efficiently prevent a terrorist attack" (Beláková 2013b: 34). In total, the USA according to the coded articles, stands somewhere in the middle between acceptance and criticism of 3D body scanners, but tends slightly towards criticism.

Why is the debate so developed in the US while in the other analyzed countries this topic is rather overlooked? There are several answers to this question. First, 3D body scanners have already started to be used in the US on a large scale as a part of increasing security controls at airports. The European Union, on the other hand, continues to debate the merits of this technology. Second, the terrorist attempt on Christmas Day in 2009 took place in the USA and the implementation of 3D body scanners have been justified in connection with this attack. Finally, introducing all kinds of security measures to protect American citizens became an important political issue in the US over the past decade. An extract from a US national security report demonstrates the extent to which the topic has become politicized, stating that, "President Obama claimed that the measures were 'the only ones right now that they [TSA and his counterterrorism advisers] consider to be effective against the kind of threat that we saw in the Christmas Day bombing" (Beláková 2013b: 33).

As mentioned above, the rest of our analyzed countries could be seen as reacting

to events in the US. The debate very much follows the US trend. In the rest of the countries the topic hasn´t drawn much attention, which is surprising, especially in countries where 3D body scanners have already been installed. Among these countries are the analyzed countries of the United Kingdom and Italy (Permanent Representation of the Czech Republic to the European Union 2010).

The debate in Italy seems to be quite lively and distinct at the same time. The leading voice in the debate about 3D body scanners comes from "politicians." It is interesting in comparison to other analyzed countries where politicians themselves did not have the leading role in media debates. In a neighbouring country, Spanish "politicians" did not get a single code as actors. In general the debate about 3D body scanners in Italy was more political than in other countries except for the USA, where national security is the number one political priority. "Politicians considered in this analysis tended to stress the urgency of the implementation of security measures, but at the same time they drew attention to the high security standard already reached. It was a double-sided discourse; on one side they tended to underline security matters as pivotal points on the agenda, reassuring voters. But on the other hand they stoked feelings of insecurity, guaranteeing voters' trust" (de Gramatica 2013: 21). The debate about 3D body scanners in Italy was connected to the general debate over security during Berlusconi´s fourth government and was fed by the Northern League (a right-wing political party in Italy), which blamed illegal immigrants for causing an increased feeling of insecurity, and declared that the state needs more effective security measures.

The second important actor in Italy was the "Transport Security Agency" (ENAC in Italy). ENAC carried a parallel function as "politicians" in the debate. It supported the use of 3D body scanners. "Journalists" – the third most important actor – were opposed to "politicians" and ENAC. They evaluated the use of body scanners mainly negatively and their arguments were supported by "expert´s" opinion.

An interesting position in the Italian debate is assumed by "passengers." While in other countries passengers were one of the strongest opponents of 3D body scanners, in Italy they were unanimously for the scanners. "But passengers were aware that it required a trade-off. They often repeated the slogan frequently used by politicians, 'better naked and alive than dead" (de Gramatica 2013: 91).
Here one must mention the role of the church in the debate. Did the Vatican take a stand about the use of 3D body scanners? The Italian report shows that it played a very small role. "Only 2% of statements were given by religious organizations, but this data is highly representative of the Italian context. The Pope's opinion was covertly adverse to the body scanner, due to privacy reasons. He never referred directly to the device, but his allusion was clear; the dignity and integrity of human beings are their most valuable capital. As often happens in Italy, the Vatican's opinion about moral and ethical issues is publicly declared but in a veiled manner" (Ibid.).

Italy, together with Great Britain and Netherlands, is an advocate of body scanners. Italian authorities asked for regulation at a European level and wanted common criteria to be settled throughout the EU. But reluctant countries, led by Germany, didn´t support the Italian initiatives and the installation of scanners continues to be regulated at the national level only. Italy is one of a few EU member states

where the scanners have been installed so far (Permanent Representation of the Czech Republic to the European Union 2010).

There are no major inputs from Spain, Poland, the Czech Republic, or Slovakia, which would enrich the debate about 3D body scanners. The topic didn´t garner any significant attention there. The actors providing statements in these contries were not domestic in most of the cases and the statements were mostly informative. We cannot proclaim any strong conclusions due to the lesser importance of the topic in these countries, but according to the coded statements they tend to evaluate 3D body scanners negatively. Another country that tends to be critical of 3D body scanners is Germany (see Table 6). One of the reasons, as the author of the German report demonstrates, is the labeling of the 3D body scanners as "Nude scanners" in the German media at the beginning of the discussion (Nitzche, 2013), casting them negatively in the eyes of public from the first moment they heard about it. The actors speaking most frequently in German newspapers are "politicians," followed by "experts."

In the case of Great Britain we can see the strong position of "journalists" themselves in the statements. Government entities and "politicians" have entered the debate quite a lot as well, arguing in favour of the scanners in response to terrorist threats. Great Britain is one of the countries where the scanners are already being used, so we could see relatively active debate there. The argumentative strategies were more negative than positive thanks to various "advocacy groups," "experts," and "passengers." There is a lot of debate on the subject of privacy between "politicians" and civil rights advocacy groups.

OI contrast to its northern neighbour, the debate over 3D body scanners has not developed much in Mexico, where it was the least covered of all three topics. Mexico could be characterized to be somewhere in the middle between support and criticism of the 3D body scanners. Mexican media mostly reprinted US articles and commented on it "from the other side of the border." The general opinion can be approximated by the title of one of the articles which says: "They will undress Mexicans" (Reforma 2010). It indicates the position "them" (Americans) against "us" (Mexicans), which can be found in the Stuxnet case as well.

5.1.2 The most salient topics and justifications related to the 3D body scanners

The United States was indisputably a leading country in the debate about implementation and acceptance of 3D body scanners. The reasons are threefold. First, the US debate was the richest in terms of arguments and justifications. The most topics appeared in American newspapers (407), as well as the most justifications (238) of body scanners (for more details see Graph 5). All main topics (except for "privacy") and all main justifications were highly salient in the analysed US daily papers (see Tables 1 and 2), the conservative "Wall Street Journal" and the liberal "New York Times".

Second, the USA also shaped and significantly influenced the information about 3D body scanners in other countries which were included in our comparison. In other words, the American debate spilled over to many states. This trend was visible

particularly in Mexico, Poland, and the Czech Republic. Media in these countries mostly reflected the situation in the USA and relied particularly on US media outlets such as The New York Times, CNN, and press agencies like the AP and DPA.

Third, the US security context and implementation of anti-terrorist measures are highly relevant worldwide. The United States is a key actor in world security and the war against terror and one of the countries which is most threatened by terrorist attack, and also as has numerous experience es with these attacks. Similarly, the USA spends the highest amount of money on its internal and external security (Strouhalová 2013).[7] The highest number of scanners worldwide are installed in the US airports, for example. In 2010, 385 body scanners had been installed in 68 airports (Academic.ru 2013).

On other side, the debate about full body scanners was weakest in Poland (just 30 topics and 11 justifications), Mexico (26 topics and 19 justifications), and Italy (just 21 justifications). Attention paid to 3D scanners in these countries was low (see Tables 1 and 2) with shallow public debate and repetitive information taken from mainly US sources. This fact is interesting particularly in the case of Italy, as there the scanners were installed but general public debate on their pros and cons or broader analytical context was missing.

It was expected that the debate about body scanners would be more sophisticated and this topic would be more salient in countries where scanners have already been installed. In countries from our sample, the scanners were installed mainly it the airports in USA, some airports in UK, Italy, and they were tested in one German airport (Permanent Representation of the Czech Republic to the European Union 2010).[8] The assumption was confirmed in the case of USA and Great Britain and partly in Germany. Nevertheless, it was not proven in Italy.

Scanners have not been installed yet in new EU member states and Polish, Czech, Slovak, and Mexican newspapers perceived scanners to be more or less as an external problem which was not particularly interesting to the general public in their countries. But in fact the scanners are relevant for common people in the countries where they have not been implemented yet. Citizens of those countries could experience body scanners while travelling to the countries where the scanners have been installed. For example, one Czech journalist described his negative and humiliating experience with the scanning procedure at US airport.

Past experience with terrorist attacks is other important aspect in perception of counter-terrorist measures, such as 3D body scanners (Mansfeldová and Guasti 2013). In the countries with this experience, such as the United States, Spain and Great Britain, there was greater media attention to the topic of 3D body scanners and the debate was deeper and more analytical.

"Report on Perception of Security and Acceptance of Risk" mentions that a good tool of evaluation of the cross-country differences in risk perception are public

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[7]US military costs were 661 billion USD in 2009. It is a 43% share of global security expenses (Strouhalová 2013).

[8]Scanners were also installed in other EU member states, such as France, the Netherlands, and Finland (Big Brother Watch 2013), but these countries are not included in this project.

opinion surveys (Mansfeldová and Guasti 2013). According to the "European Social Survey" from 2008, people in old EU member states, particularly from the countries where terrorist attacks had happened, felt more threatened by terrorism, which could explain higher interest of media in anti-terrorist measures. This trend is illustrated by the respondents' answer to the question of whether they considered terrorist attacks probable in the following year. Almost 85% of British and 82% of Spanish citizens expected a terrorist attack the following year.[9] Citizens in Germany and Poland, on the other hand, were less worried and only 68% and 64%, respectively, of citizens thought that a terrorist attack was probable. The lowest concerns about an attack were reported in Slovakia and the Czech Republic, where the same threat was real only for 56% and 44% of inhabitants, respectively (Mansfeldová and Guasti 2013).

Graph 5: Comparative assessment of salience by countries and main topics related to the 3D body scanners 2010-2013
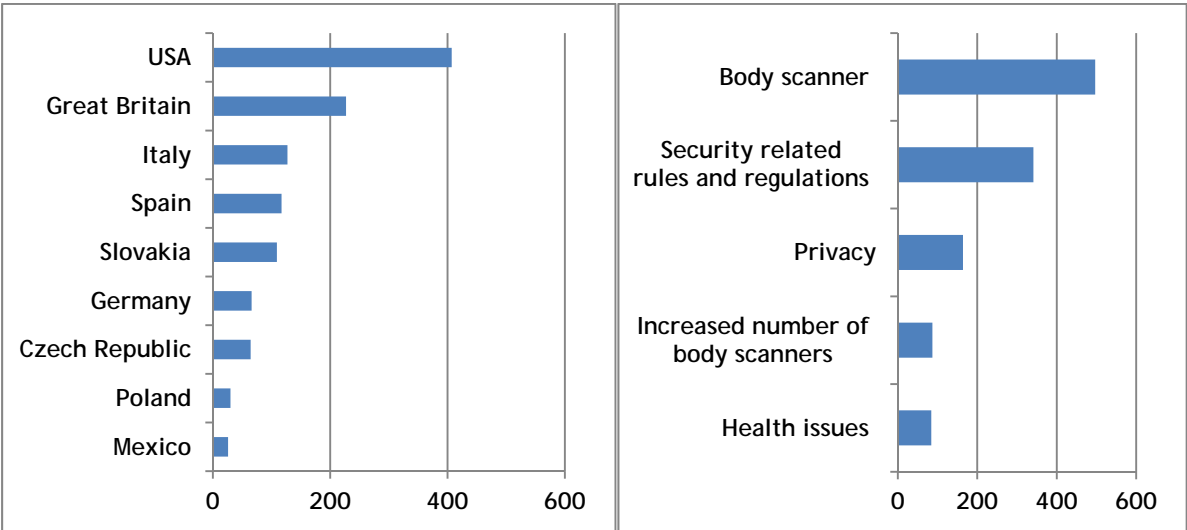
Source: SECONOMICS ISASCR

Table 5: Categorization of topics according to salience 2010-2013

	Body scanner	Security related rules and regulations	Privacy	Increased number of body scanners	Health Issues
high salience	USA UK	USA UK Spain	Spain UK	USA Spain Slovakia	USA UK Czech Republic Germany
medium salience	Italy Slovakia Germany	Slovakia	USA Slovakia Germany	Poland Great Britain	Italy Slovakia

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[9] The original version was: "*Do you think that a terrorist attack somewhere in Europe during the next twelve months is... Select answer: very likely, likely, not very likely, not at all likely*" (Mansfeldová and Guasti 2013).

low salience					
	Czech Republic				
	Spain Mexico Poland	Czech Republic Mexico Poland Italy Germany	Czech Republic Mexico Poland	Czech Republic Mexico Italy Germany	Spain Mexico Poland

Source: SECONOMICS ISASCR

Graph 5 and Table 7 show that prevailing topic was "body scanner" itself. This topic was particularly salient in the USA and Great Britain. The US press mentioned the topic of "body scanners" 150 times, almost as much as Great Britain, while in Poland it was mentioned only in 13 cases. Nevertheless, "body scanners" is very general topic and was also used in cases where a more specific topic was not available. This topic was used in descriptive articles and usually it was not mentioned with any justification or presentation of attitudes towards the scanners. The topic of body scanners was often connected with the second most salient issue, "security related rules and regulations." These topics were particularly interesting for newspapers in 2010.

Security related issues prevailed particularly in the USA, Great Britain, and Spain. Newspapers often mentioned installations of scanners and described the process of scanning. US newspapers also discussed the alternative security rules and measurements such as thermal cameras, metal detectors, tiered screening, or the usage of specially trained dogs capable of detecting drugs, weapons, and explosives.

Debate about implementation of body scanners changed repidly over time. Debate was connected with the national and international context in observed countries and particularly in the USA. Firstly, all the observed countries paid attention to the failed terrorist attempt on the flight from Amsterdam to Detroit on 25 December 2009. After this failed attacked, many countries, such as the Netherlands, the UK, France and Italy, started to install 3D body scanners (Permanent Representation of the Czech Republic to the European Union 2010).

In 2010, newspapers justified scanners by pointing to the strengthened security they provided, as well as their efficiency. "Efficiency" was the most salient justification among all countries and it was very often connected with the topics "body scanners" and "security rules and regulations." Proponents of the scanners claimed that full body scanners are a necessary and effective tool for strengthening airport security in response to the global terrorist threat. The efficiency of scanners was a highly salient topic in the USA, Germany, and Slovakia, while in the United Kingdom this justification was surprisingly unimportant (see Table 8).

In some countries, other aspects than security and efficiency were considered when judging body scanners. This trend was particularly visible in Italy. The Italian debate follows the principles of the Italian renaissance politician and philosopher Niccolò Machiavelli in that the ends justify the means. In the most Italian articles "the dilemma of security versus freedom was resolved with calm resignation as

articles stated that privacy could smoothly be put aside for security reasons" (de Gramatica 2013: 50).

At the end of 2010 and during 2011, new topics and especially new justifications started to appear in newspapers in many countries. These mainly pointed to the negative aspects of scanners´ implementation, as well as security rules and regulations. Opponents of the full body scanners mentioned three important arguments against scanners´ usage, namely "privacy," "health," and "quality of service" (for more details see Graph 6). Regarding these three kinds of justifications, the USA and Germany were the most critical of the body scanners because they mentioned their negative aspects most often. In this respect we should mention the relative lack of critical public debate in UK. Despite high interest in the issue of body scanners itself and their implementation, British newspapers did not often justify their arguments. For comparison, negative salience of full body scanners with regard to the privacy, health, or quality of service was presented in British daily papers altogether only 19 times while in German press it was 44 times and in American newspapers 121 times.

The first and most important justification was "privacy," which was highly salient for both English speaking countries, Germany, and the Czech Republic. "Privacy" was also often used as a topic. Regarding privacy, the fear of potential misuse of the scanner images and problematic data storage were mentioned. Similar concerns also appeared in articles that dealt with another security topic – CCTV cameras, which also led people to fear for their personal data.

The media also focused on cultural differences in defining privacy, as sensitivity to security rules and regulations are influenced by passengers' religious, ethical, and ethnic background (Mansfeldová and Guasti 2013). The New York Times wrote about one case, also cited by other media outlets, in which two Muslim women refused the scanning procedures for religious reasons. As a result, they were not allowed to board their plane, even though they had valid tickets.

Issues of privacy and the misuse of scanner pictures were connected with passengers' rights, dignity, and even with sexual harassment as the scanners originally revealed the naked bodies of passengers. In this respect, newspapers sometimes used expressive language, describing scanners with such terms as "stripped" or "naked" scanners. According to British and Slovak newspapers, there was also a potential threat of misusing scans of children for the purpose of child pornography. In 2011, newspapers wrote about a new scanning technology which was able to blur the intimate parts of human body and made the process of scanning less problematic in regards to privacy.

Critics' second cencern was the increased risk of cancer potentially posed by the radiation released during the process of scanning. Newspapers cited the experts who claimed that the amount of radiation was very small. However, it could increase significantly if the scanners malfunctioned. Heath was used often as a topic as well, as it justified authors' negative views. That is why it was at times difficult to distinguish between themes and justifications.

The issue of "health" was particularly salient in the USA, Germany, and the Czech

Republic, but totally absented in Poland where "privacy" was the only avenue of criticism (see Graph 6 and Table 8). Regarding the risk of cancer, Czech newspapers pointed to the negative aspects of the trade-off between security and health. They reflected on the paradox of new security technologies that, rather than protecting citizens, become another potential threat to their well-being. "The effort to stop the risk of a possible terrorist attack could raise another treat for human life with the same probability" (Gawrecká 2013: 43).

The third point of criticism of body scanners focused on their low "quality of service," i.e. that they made the experience of flying more uncomfortable. Unlike the other justifications, "quality of service" was not mentioned in many countries from our sample, but only in the United States, Germany and occasionally in Spain (for more details see Graph 6 and Table 8). In the remaining countries this justification was either marginal or absent. The American and German press also highlighted the business aspect of air travel. In this arguments passengers were not only citizens who to be protected, but also consumers whose satisfaction is important. In this respect, people complained about the long and tiring lines that formed at scanners, the rude behaviour of the security staff, and sometimes the humiliating security inspections which decreased the comfort of travelling. This justification was sometimes connected with the issue of privacy.

European newspapers (particularly media in new member states, such as Slovakia, Poland, and the Czech Republic) also paid attention to the European perspective of aviation security and body scanners. They wrote about the EU context of the purchase and installation of body scanners, as well as of the attempts to regulate their use on EU level. Although the installation of body scanners remained under the powers of national legistalors in EU member states, newspapers called for some kind of regulation, such as common privacy policy procedures, or regulation of the health threats posed by scanners. In this respect a Slovakian newspaper quoted a resolution of European Parliament that stated, "passengers should have the right to refuse body scanner inspection in favor of a different kind of inspection which will ensure the same level of security, as well as full respect for the rights and dignity of the checked person" (Beláková 2013a: 16).

Graph 6: Comparative assessment of salience by countries and main justifications related to the 3D body scanners 2010-2013
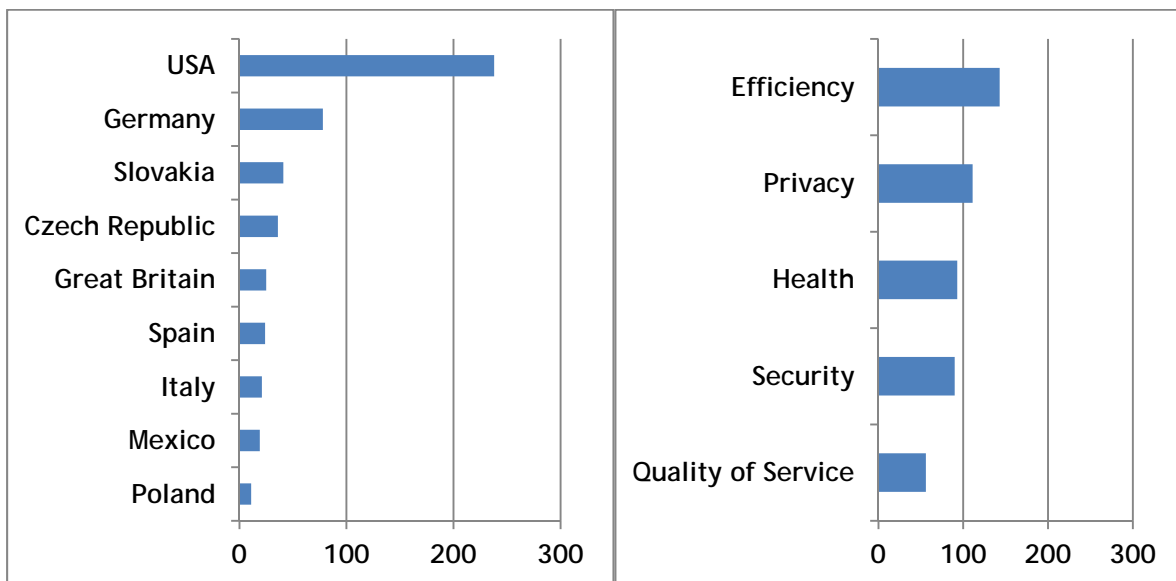
Source: SECONOMICS ISASCR

Table 6: Categorization of justifications according to salience 2010-2013

	Efficiency	Privacy	Health	Security	Quality of Service
high salience	Slovakia Germany USA	Czech Republic Germany UK USA	Czech Republic Germany USA	Slovakia Germany USA	USA Germany
medium salience	Italy	Spain Italy	Spain Italy Mexico Slovakia	Spain Czech Republic Mexico	Spain
low salience	Spain Czech Republic Mexico Poland UK	Mexico Poland Slovakia	Poland UK	Italy Poland UK	UK Slovakia Poland Mexico Italy Czech Republic

Source: SECONOMICS ISASCR
Note: Based on means for each justification
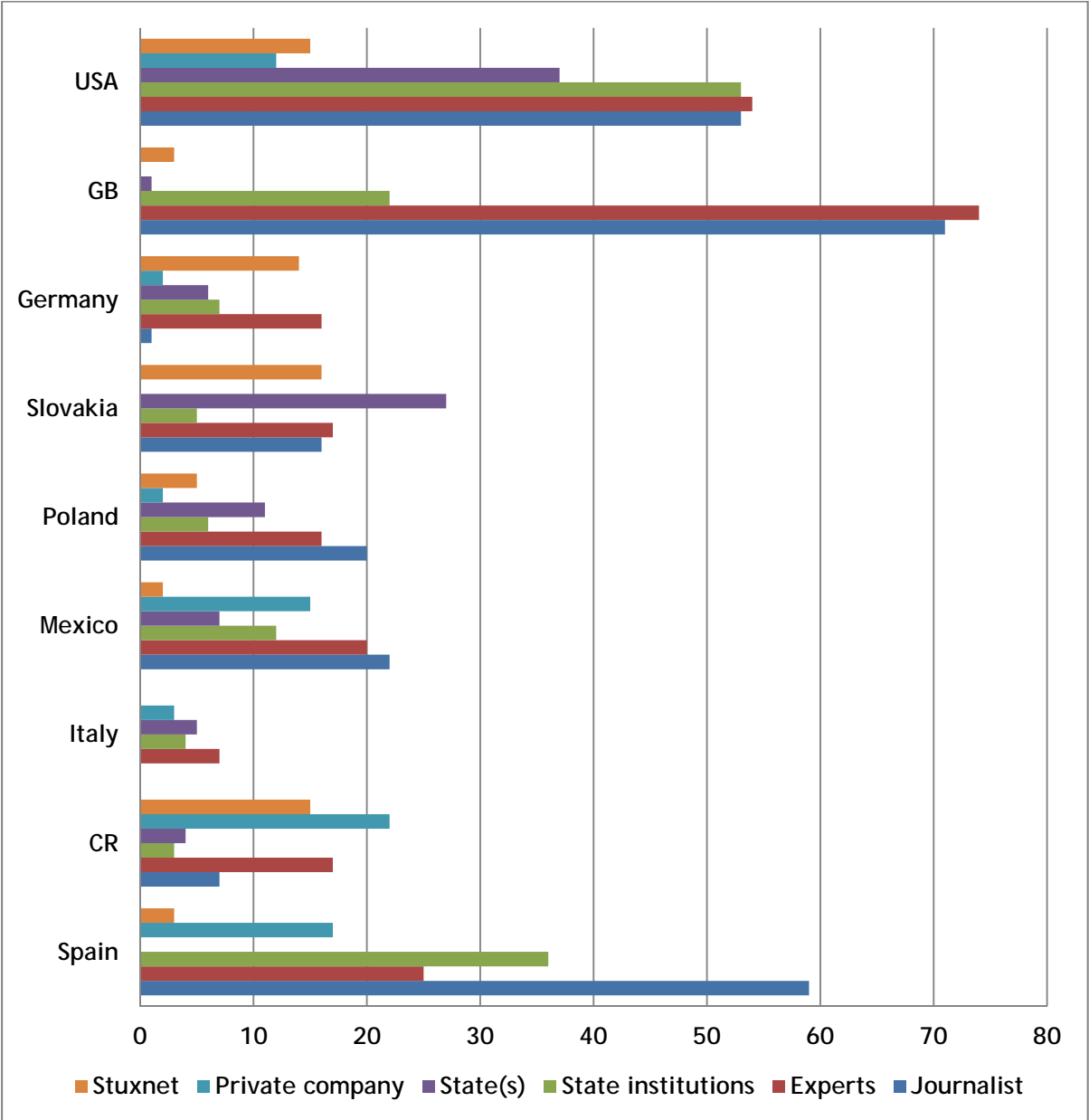
5.2 Stuxnet

5.2.1 The most salient actors and argumentative strategies related to the Stuxnet virus

The Stuxnet case has a special position compared to our other two topics due to its technical character. The debate was led almost entirely by state officials and "experts," though "journalists" did provid statements of a mostly explanatory character and were also present in the debate (see Graph 7). Unlike in the other two topics, the public and various civil society groups had only a marginal position among the actors. But the topic, at least in the country of its origin, attracted quite a lot of public attention, judging by the number of articles published over the selected period and the number of actors who provided statements. The United States were indisputably the leading country in this topic, establishing the agenda for others. The reason for this is clear. Stuxnet, the computer virus used as a weapon to delay Iranian uranium enrichment programme, was a domestic topic in the United States. The media in the other analyzed countries followed the American debate, first by reporting on the character of the virus and explaining the situation, and then by evaluating and analyzing the events that occurred. Outside the USA the discussion is quite similar in all our selected countries, with an exception of Mexico, which saw the issue from a slightly different perspective, namely that of a potential target of cyber weapons in the future. The other selected countries, according to the analyzed articles, rather maintained the perspective of a detached observer.

The topic first appeared in 2010 following the attack on the Iranian uranium enrichment facility in Nataz. At first journalists only wrote about about the character of the attack, trying to explain its complexity without drawing any firm conclusions. Then, the question of the origin of the virus was settled. After initial speculation about the involvement of the United States and Israel in the attack, presumptions were confirmed in 2012. Since then the debate focused on the United States and its president leading the operation under the cover name Olympic Games. Step by step the discussion about Stuxnet moved from the specific details of the attack and its instigators, providing mostly informative statements, to a more abstract debate about cyber weapons in today´s world and their role in a potential cyber war. The discussion then moved on to the need for regulations and defenses against possible future threats at the national level.

The Stuxnet case is relatively distant from individuals and thus does not attract much attention outside of the US. In terms of risk perception, it concerns the state, rather than the individual. Nevertheless, the use of cyber attacks in the future could have far-reaching consequences for the public, so it is desirable for people to be informed about these issues.

Graph 7: Overview of the top 6 actors in articles about Stuxnet

Legend: ■ Stuxnet ■ Private company ■ State(s) ■ State institutions ■ Experts ■ Journalist

Source: SECONOMICS ISASCR, based on Table 9

Table 7: Overview of the most important actors in articles about Stuxnet, 2010-2013

Actors	E	CZ	I	MEX	PL	SK	D	GB	USA	Total
	No.	No.	No.	No.	No.	No.	No.	No.	No.	
State institutions	36	3	4	12	6	5	7	22	53	148
President	5	5	0	10	0	10	13	4	16	63
National Security Agency	0	0	6	0	0	2	0	2	14	24
Private company	17	22	3	15	2	0	2	0	12	73
Journalist	59	7	0	22	20	16	1	71	53	249
Experts	25	17	7	20	16	17	16	74	54	246

	E	CZ	I	MEX	PL	SK	D	GB	USA	Total
Virus/Malware/Worm	0	3	0	1	0	6	3	0	2	15
Stuxnet	3	15	0	2	5	16	14	3	15	73
Flame	5	6	0	1	0	2	1	0	3	18
Other	0	0	0	1	2	0	0	3	13	19
State(s)	0	4	5	7	11	27	6	1	37	98
Media	0	3	0	0	5	14	4	3	4	33
Total	150	85	25	91	67	115	67	183	276	

Source: SECONOMICS ISASCR
Note: Top 5 actors in yeach country are marked in yellow

For Stuxnet as well as for 3D body scanners, the main actor among analyzed countries was the United States (see Graph 4 and 7). There are quite a lot of codes for Great Britain and Spain in this topic, but after analysis we can say that these mainly point to the American actors as well. In the rest of the European countries Stuxnet didn´t draw so much attention. Mexican newpapers republished many US articles, but also attached their own points of view on the problem. In terms of actors, the most cited were "experts" (249 codes) followed by "journalists" (246 codes) and representatives of "states" and "state institutions" (together 246 codes). This trend was due to the character of the topic being similar in all the studied countries.

Table 8: Overview of argumentative strategies in the articles about Stuxnet

Argumentative strategies	E	CZ	I	MEX	PL	SK	D	GB	USA
definitive	137	70	28	81	57	109	39	174	198
evaluative	1	2	6	3	4	2	27	6	62
advocative	0	1	0	1	1	0	0	5	15
Total	138	73	34	85	62	111	66	185	275

Source: SECONOMICS ISASCR

Table 9: Overview of direction of argument in the articles about Stuxnet

Directions of argument	E	CZ	I	MEX	PL	SK	D	GB	USA
positive	0	1	6	3	1	1	8	6	28
negative	1	3	0	2	2	15	20	1	59
neutral	137	69	28	80	59	95	38	178	188
Total	138	73	34	85	62	111	66	185	275

Source: SECONOMICS ISASCR

Due to its technical nature, Stuxnet was mostly framed by definitive statements. Only the United States and Germany provided a significant number of evaluative statements in the articles. As we can see in Table 11, the evaluative strategies used in the Stuxnet articles are rather more negative than positive. Only Great Britain and Italy tended to evaluate Stuxnet slightly more positively. Excluding the USA, Germany and Slovakia are most critical of Stuxnet, according to the studied newspaper articles. However, if we take a look at the Slovak articles we can see that most of them are republished from foreign sources, so they cannot be taken as reflection of the Slovak opinion. The USA, with the largest number of coded

argumentative strategies, also stands on the side of critics. That is apparently thanks to "journalists" acting in the statements and expressing their opinion, as well as from "experts" arguing mainly against the use of the virus. But the coded statements in the US did not always evaluate the virus itself. For example the positive ones also expressed the need for establishing some international cyber-warfare rules (Beláková 2013a). "Presidents Bush and Obama, and other US officials were among the supporters of Stuxnet. They viewed the virus as crucial in their effort to delay or hinder the Iranian uranium enrichment programme, which they considered a direct security threat for the US and the West" (Beláková 2013a: 46). According to the American report, some of the officials who saw Stuxnet as positive did question more aggressive cyber-attacks, such as those against North Korea and Al Qaeda operations. But among critics there were many commentators, "experts," and American businesses that became victims of retaliation for the Stuxnet attacks. They feared the increased use of cyber-attacks in the future and their unpredictable consequences. "Other experts and commentators saw the development and deployment of Stuxnet by the US and Israel as dangerous because it could lead to a militarisation of or even an uncontrolled arms race in cyberspace" (Beláková 2013a: 50).

To sum up, the single most frequently coded actor in the United States were "experts" (54 codes), but the topic in the media was dominated by various "states" and "state institutions," or their representatives, namely the US President (with 106 codes altogether). "Journalists" themselves also provided a large number of statements (53 codes, see Table 9). But the issue was not framed in domestic terms alone. Actors from Iran and Israel provided statements as well.

Among other countries, Mexico and Germany stand out, followed by the remianing European countries with rather similar results. Mexico tracked the American debate. Most of the articles came from the US and were then translated directly into Spanish. But occasionally commentators enriched the debate with their own points of view, expressing the role of Mexico in the situation. Seeing itself as a potential target in the future, there are voices calling for the development of effective protection in cyber space to protect against future cyber threats. "The attacks against Iran demonstrate that the infrastructure of a country can be destroyed without the need of bombing it or planting saboteurs" (Reforma 2013). Mexico gave quite a lot of space to Iranian experts and state representatives who explained the situation in which they had found themselves (Vamberová, 2013). That also points to the presumption that Mexican media tends to stand rather on the side of Iran, criticizing the violation of a stat's sovereignty.

Germany, as mentioned above, has a large number of evaluative strategies (27 codes) with a negative direction of argument. Among actors, the most frequent ones in German newspapers were "experts," followed by the "president" (of the United States), then state officials and "institutions." Despite the small number of articles, from which we can infer the topic was of little interest to the German public, the discussion seems to be more interesting than in the rest of the analyzed European countries. In Poland, Slovakia, the Czech Republic, and Spain, where the statements are, for the most part, merely informative and all of the actors are foreign (if they are not journalists themselves), the discussion is less engaging. The reason for this is probably the involvement of the German company Siemens, which

made the equipment attacked by the virus. The second reason could be a general interest in Germany in privacy-security issues, which the analysis has indicated (Nitzche, 2013). Slovakian newspapers made just one notable exception to its usually informative style when it mentioned that, according to international law, the attack of USA and Israel on the Iranian power plant was in fact illegal. It stated that the "attack on the infrastructure of other states needs to be assessed in the same way, regardless of whether they are caused by missiles or by a computer virus. The cyber-attack of USA and Israel is thus a breach of international law" (Mačák 2012).

In UK the debate seems to be in hands of "journalists" and "experts," who had the highest number of coded statements (see Graph 7). These articles contained a lot of commentary by computer security researchers. The same patterns held true in Italy and Spain. Surprisingly, "journalists" dominated the debate over Stuxnet. The Spanish articles about this issue were purely informative, although it captured some interesting points. Spanish media, as well as the Mexican outlets, expressed a fear of being attacked by a similar force in the future. "This also points to the fact that many state representatives were trying to chase away worries of its citizens that their country could also be targeted by a similar attack" (Pereira-Puga, Hronešová 2013: 38).

Cyber security is an important topic at the European Union level, rather than at the level of the individual member states. A cyber-attack can be deployed against any of its member states and therefore there should be a broad discussion at the EU level about cyber-space protection, future developments in this field, possible international regulations, and, more generally, about where Europe stands on the sovereignty of the nation-states all over the world.

5.2.2 The most salient topics and justifications related to the Stuxnet virus

Unlike the other two security issues, Stuxnet is not a technology that directly affects the daily life of common people. The aim of Stuxnet is not to improve the security of individuals by monitoring public places, as CCTV camera systems do, or to detect weapons and prevent a terrorist attack, as 3D body scanners do. Stuxnet, the computer virus, is a weapon itself. It was not developed to protect critical infrastructure, but to destroy it.

From all of the three security topics involved in our comparison, Stuxnet has the greatest impact on geopolitical stability and questions of international law and security. Therefore, this topic is highly relevant not only in the global security context at the macro level, but also for the security of individuals, although this saliency on the micro level seems to be indirect and even marginal today.

We found that three interconnected perspectives are, to a certain extent, typical in the media coverage of Stuxnet in observed counties.[10] In some countries, such as the United States, Germany, and, to some extent, Slovakia, one can see all three

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[10]These levels of Stuxnet's media perception were described in the Italian report (de Gramatica 2013), but similar summaries appeared in the majority of the other country reports.

levels of media perception, which led to a sophisticated and detailed debate. Nevertheless, in the most states, including the Czech Republic, Poland, Great Britain[11] and Spain, media coverage of Stuxnet was reduced to one, or at most two, perspectives. Media in these countries published mainly descriptive articles about Stuxnet but these lacked the wider context and justifications. In other words, newspapers answered the questions of "who" "what" and "where," but the most essential answer to the question "why" – which covers justifications of arguments, its legitimacy, and the broader debate about virus consequences and impact – was mostly missing.

The first and prevailing perspective shown in the analysis of Stuxnet articles was purely informative. Newspapers described the virus and its functions. They also reported on the details of the attacks on the Iranian nuclear program. In general, the articles describing the virus were longer, more detailed, fact-centered, and contained the opinions of experts more often than the articles dealing with the functions of other two, issues CCTV cameras and 3D body scanners.

The prevailing topics in these articles were "Attack on Iran" and "Iranian enrichment uranium programme" (for more details see Graph 8). These topics were very closely interconnected because the aim of the virus was to damage and hinder the Iranian nuclear programme. In this respect, newspapers wrote that the virus targeted two Iranian nuclear facilities - centrifuges for uranium enrichment in the Natanz and Bushehr nuclear power plants. These cyber-attacks on Iran were a particularly salient topic for newspapers in the United States, Great Britain, Spain, and Slovakia (see Table 12) but the attention to cyber-attacks was also paid in the remaining countries in our sample.

Two other important topics were "Stuxnet" itself and "Deployment attack using Stuxnet." Nevertheless, the topic "Stuxnet" is not particularly relevant for our comparison because it was mostly used when no other suitable topic was available. A similar situation also occured in the 3D body scanner and CCTV camera articles when topics "body scanners" and "CCTV cameras" appeared relatively often but did not provide any particularly interesting or new viewpoints.

"Deployment attack using Stuxnet" is more salient topic for our comparison. This topic was relevant especially in the American, Slovakian and Spanish press. Newspapers paid much attention to the attacks focused on other states. They mentioned that victims of Stuxnet were not only in Iran, but that the virus had also attacked critical infrastructure in Indonesia, India, Azerbaijan, and Pakistan. Another important sub-issue was the origin of Stuxnet. In this regard, the press speculated about who could afford to develop this virus. Newspapers supposed that only a rich and powerful state would have enough financial and human resources to create such an expensive and sophisticated virus. "According to experts, a great amount of time and money had to be invested in order to create the virus. It is therefore unlikely that some hackers created Stuxnet just for fun. Some powerful state must be behind Stuxnet that was able to detect weaknesses in the industrial systems the virus targeted" (Gawrecká 2013: 38). This assumption was later confirmed, when it was revealed that virus was created by the United States and Israel within a secret operation dubbed "Olympic games."

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[11]This is in spite of the relatively large amount of attention the British media paid Stuxnet.

The development of topics over time reflected the international context of the Stuxnet affair and important changes in the field of cyber security. Newspapers displayed the greatest interest in Stuxnet when it was first revealed in 2010. They wrote articles about the virus itself, decribing its functions and its effect on the Iranian nuclear programme. They also speculated about who developed the virus. In 2011 and 2012 newspapers focused on cyber-attacks in other countries and on the appearance of new viruses, such as Flame, Stars, Duqu and Red October, which were Stuxnet's successors.

Graph 8: Comparative assessment of salience by countries and main topics related to Stuxnet 2010-2013
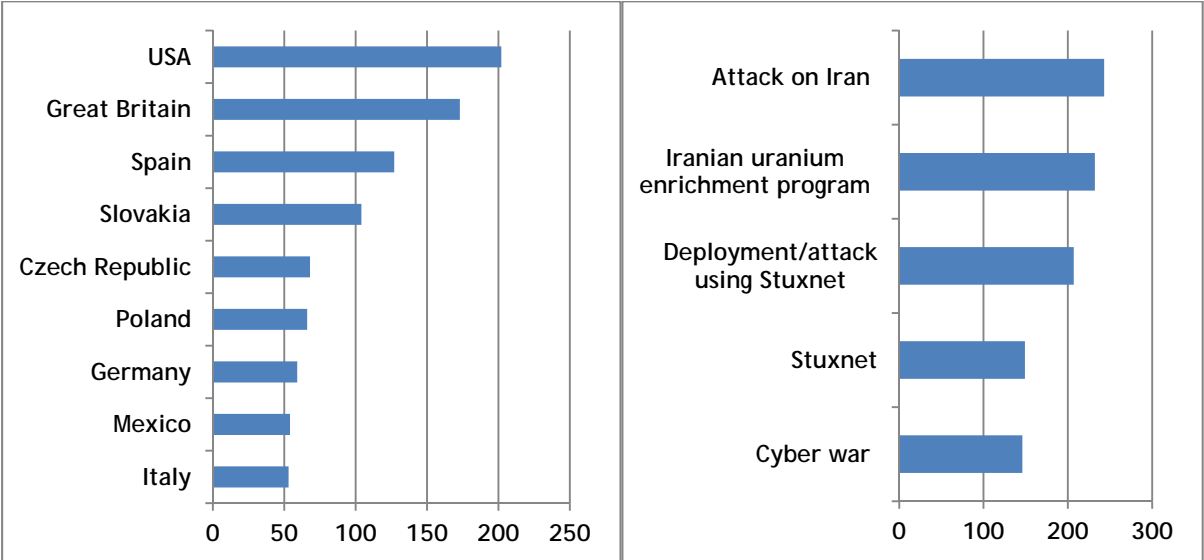
Source: SECONOMICS ISASCR

Table 10: Categorization of topics according to salience 2010-2013

	Attack on Iran	Iranian uranium enrichment program	Deployment/attack using Stuxnet	Stuxnet	Cyber war
high salience	Spain Great Britain	UK USA Slovakia Spain	USA Slovakia Spain	USA UK Germany	Spain Czech Republic USA UK
medium salience	Slovakia Germany USA	Poland Czech Republic	Italy Mexico	Czech Republic Italy Mexico	Germany Poland Italy Mexico
low salience	Czech Republic Italy Mexico	Germany Italy Mexico	Germany UK Czech	Spain Poland	

39

		Republic			
	Poland				

Source: SECONOMICS ISASCR

In the second wave of media coverage, the Stuxnet incident was framed in the context of global cyber security, with references to industrial espionage and cyber war. The USA played a leading role in writing about Stuxnet from a "macro" perspective, but was followed by Germany and Slovakia (see Graph 8 and Table 12). American newspapers justified their opinions more often than all other analysed newspapers. Almost one third of statements contained justifications, an exceptionally high number among the analysed countries. On this "macro" level, newspapers wrote about the larger and often negative consequences of the Stuxnet attack on geopolitical stability. These consequences included potential counterattacks, as well as the normalization of of cyber-attacks within international law.

Nevertheless, newspapers were not only critical of the virus and cyber-attacks in general. On contrary, proponents of the virus received quite a lot of the space, particularly in the American debate about security issues. Moreover, Stuxnet's "efficiency" was the dominant justification (see Graph 9). "Efficiency" was particularly salient in the USA, Germany and Slovakia. This trend is similar to the other two security issues where "efficiency" was also one of the prevailing justifications.

In the USA, Stuxnet proponents appreciated the complexity and efficiency of the virus and emphasized the security needs of their country. In this respect, the justifications "security" and "defence" appeared. The Iranian uranium enrichment programme was a significant security threat because it could enable Iran to develop a nuclear bomb. Therefore, the Stuxnet attack was justified from a global security perspective, according to the motto that "the best defence is good offence" (Beláková 2013b: 39). In other words, Stuxnet proponents considered this virus to be a quick and non-violent weapon, useful as a preemptive strike that might prevent the further development of weapons of mass destruction. Moreover, cyber-attacks were, in their minds, less harmful than bloody conflicts. Also, the moneytary costs of these kinds of attacks were relatively low compared to conventional forms of making war.

Despite these positive claims, fears of uncontrolled virus proliferation and the possibility of counterattacks appeared in 2011 and 2012. Opponents warned against a worldwide proliferation of cyber weapons which could endanger industrial systems and the critical infrastructure of many countries. The deployment of Stuxnet was, according to its American and Czech critics, similar to releasing a genie from a bottle, or opening Pandora's Box because in the future, Stuxnet could be modified and used for different targets in Western countries. In this respect Great Britain, the USA, Germany, and Mexico all felt endangered by possible attack.

Regarding negative aspects of Stuxnet, some of interesting viewpoints also appeared in the media coverage in the states of southern Europe and in Mexico.

This was a surprising finding considering the the complete absence of justifications in Italy and the lack of justifications in the Spanish and Mexican press (see Graph 9 and Table 13).[12] Spanish newspapers considered Stuxnet a milestone in cyber weapons, which meant a new way of making war, but also a new kind security threat. According to the Spanish left-leaning daily paper, *El País*, experts are afraid of the side effects of this cyber weapon. "(Stuxnet) makes reality what was once science fiction. Some experts warn of its capability to make a facility explode" (Pereira-Puga, Hronešová 2013: 28).

Although Mexican newspapers did not pay a lot of attention to Stuxnet (see Graph 8 and 9), the approach of the Mexican press is valuable for our comparison because it is focused on aspects of the legitimacy of the attack and approached the Stuxnet incident from the Iranian point of view. The Mexican perspective is exceptional because no other surveyed country gave so much space to the Iranian side of the conflict or portrayed Iran as the victim of an attack, rather than just a dangerous state. "We can say that Mexico stands rather on the side of Iranian sovereignty against the US cyber-attack. It sees itself as a potential target of these weapons" (Vamberová 2013: 43). Arguments questioning the legitimacy and legality of the attack also appeared in the Slovakian and American press, but attention paid to these topics was not significant in the greater context of the debate.

Nevertheless, the Mexican papers were not unequivocally critical of the USA. Mexico, similarl to the other countries included in our research, often relied on US information sources, influencing to a certain extent the portrayal of Stuxnet. But the Mexican approach was worthwhile because it did not emphasise only one side of the conflict at the expense of another. Rather, the Mexican coverage presented a broader range of pros and cons.

The third level of reporting about Stuxnet offers a new and more sophisticated perspective not only of Stuxnet, but also of cyber security at the "micro" level because it shows how new tools of survelience influence the daily life of common people. This perspective was represented the least in countries from our comparison. It occured, for example, in the United States, Italy, and Poland, but it was only marginal and it certainly did not dominate the security discourse in these countries. Nevertheless this approach is important because it contextualized Stuxnet in regards to the other methods of surveillance and the tracking of personal data. "It dealt with the daily and often hidden reliance on services provided and supported by technology. Bank accounts, health information, internet communication, business, smart grids, and critical infrastructure services all depend to a great degree on an efficient and trustworthy technology system" (de Gramatica 2013: 44).

In other words, the Stuxnet issue reminded us of numerous threats to our cyber world, which ordinary people face every day during common activities, such as online communication and sharing information via social networks, internet banking, paying with a credit card etc. This third perspective shows us why Stuxnet is relevant not only to leaders and experts in information technology, but especially to common people.

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[12]Graph 9 shows that Italian newspapers justified their arguments about Stuxnet only in one case, Mexican newspapers 6 times, and Spanish newspapers 7 times.

Graph 9: Comparative assessment of salience by countries and main Justifications related to Stuxnet 2010-2013
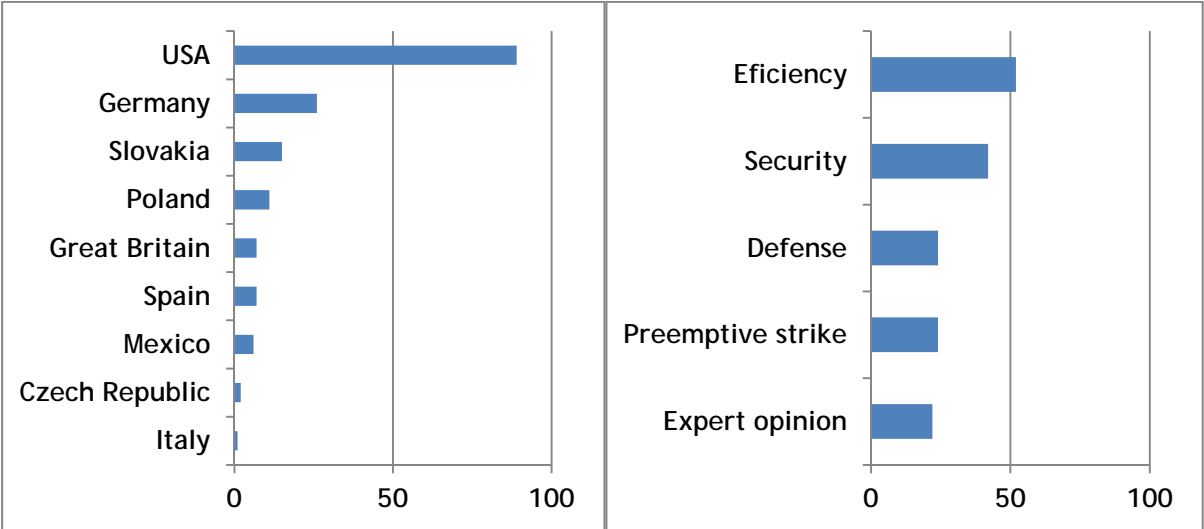
Source: SECONOMICS ISASCR

Table 11: Categorization of justifications according to salience 2010-2013

	Eficiency	Security	Preemptive strike	Defense	Expert opinion
high salience	Slovakia Germany USA	Germany USA	Mexico Poland Slovakia USA	Spain Mexico Poland Slovakia USA	Germany UK USA
medium salience	Poland UK		Spain Czech Republic Italy Germany	Italy Germany	Czech Republic Slovakia
low salience	Spain Czech Republic Italy Mexico	Spain Czech Republic Mexico Poland Italy Slovakia UK	UK	Czech Republic UK	Spain Italy Mexico Poland

Source: SECONOMICS ISASCR
Note: Base on means for each justification

5.3 CCTV cameras

5.3.1 The most salient actors and argumentative strategies related to CCTV cameras

The distribution of articles about CCTV cameras is quite different than that of the other two studied topics. The United States, the leading country in the debate about Stuxnet and 3D body scanners, seems not to worry much about CCTV cameras in public spaces. According to the number of coded actors, the US, together with Italy and Mexico, and partially Spain, can be seen as a country with low interest in the debate about CCTV cameras. The biggest number of coded actors appeared in countries that didn´t play any important role in the other two topics, Germany, Poland, and Slovakia. The Czech Republic and Great Britain stand somewhere in between (see Graph 10). It is important to note that articles about CCTV cameras published in newspapers are predominantly informative, providing information about specific crimes that were captured by cameras, for example, with no comment on the cameras themselves, and no discussion about their use. These purely informative articles had to be removed from the analysis because they did not fulfill our criteria.

If we take a look at the most important actors (Table 14) coded in the articles about CCTV cameras, we can name "journalists" as the most influential actor (378 codes in total). In addition to "journalists," there is a group of actors, including "state institutions," "politicians," and "municipality," which have together 333 codes. Another important actor is the "police" with 100 codes. Strangely, public and civil society groups are not present among the top 5 actors in the articles about CCTV cameras. That means the debate was led mostly by state authorities, who spoke about the cameras, but there was not as much space for the public to express their concerns about this issue. The articles about CCTV cameras appeared usually in the domestic sections of studied newspapers. We can say that the topic was considered a domestic issue whose influences and effects existed within the confines of each country. This perception made the debate relatively distinct in each analyzed country, showing us some general trends within each country, and revealing its position on the security-privacy axis.

Among supporters of the surveillance camera system we can name Poland, Slovakia, the Czech Republic, and Italy, based on the coded statements with positive direction, as summarized in Table 16. The biggest opponent is Germany. Great Britain shows a prevalence of negative arguments as well, while the US tends to evaluate CCTV positively. In the USA, public opinion has gone through a dynamic development. At the beginning of the studied period, CCTV cameras seemed to be perceived rather negatively in the US and there was not much attention paid to this issue. After the attack at the Boston Marathon in April 2013, where CCTV cameras played an important role in the identification of the culprits, general opinion started to be more tolerant about CCTV cameras (Beláková 2013b). The remaining countries are more or less balanced between support for CCTV and skepticism, in the studied articles.

The arguments, as in the other two topics, are mostly definitive with a neutral direction of argument (see Table 15). But unlike Stuxnet, there are a relatively high number of evaluative and even advocative strategies. However, Germany is an exception, as its articles are dominated by evaluative arguments. This indicates the discussion of CCTV cameras in Germany is quite developed. Also, Slovakia, the Czech Republic, and Poland have quite a high number of evaluative statements. These trends could be a result of these countries' similar historical experiences.

According to the national reports used for this analysis, it seems that approval of CCTV cameras experiences a (temporary) radical shift towards greater acceptance every time a terrorist attack takes place. However, tolerance for surveillance measures tends to evaporate just as rapidly, after coverage of the attack and its aftermath stops. Several studies on risk perception confirm this trend (see Mansfeldová and Guasti 2013). The perceived risk can also vary between countries. In their Report on Perception of Security and Acceptance of Risk, Mansfeldová and Guasti explain why significant differences exist in the perception of risk among European countries. Not only cultural differences but past experience seems to be the most important factors. The analysis points out that a country's past experience with terrorist attacks significantly influences subjective feelings of threat. Therefore, among European countries the United Kingdom and Spain show higher subjective feelings of threat than the rest of the studied European countries (Ibid.). One can also see an interesting division cbetween old EU member states and the new member states that have not yet experienced a terrorist attack in such a direct manner. The topic CCTV cameras then, in broader context, can be an important topic of discussion on the European level, despite its mostly national character.

Graph 10: Overview of the top 5 actors in articles about CCTV cameras
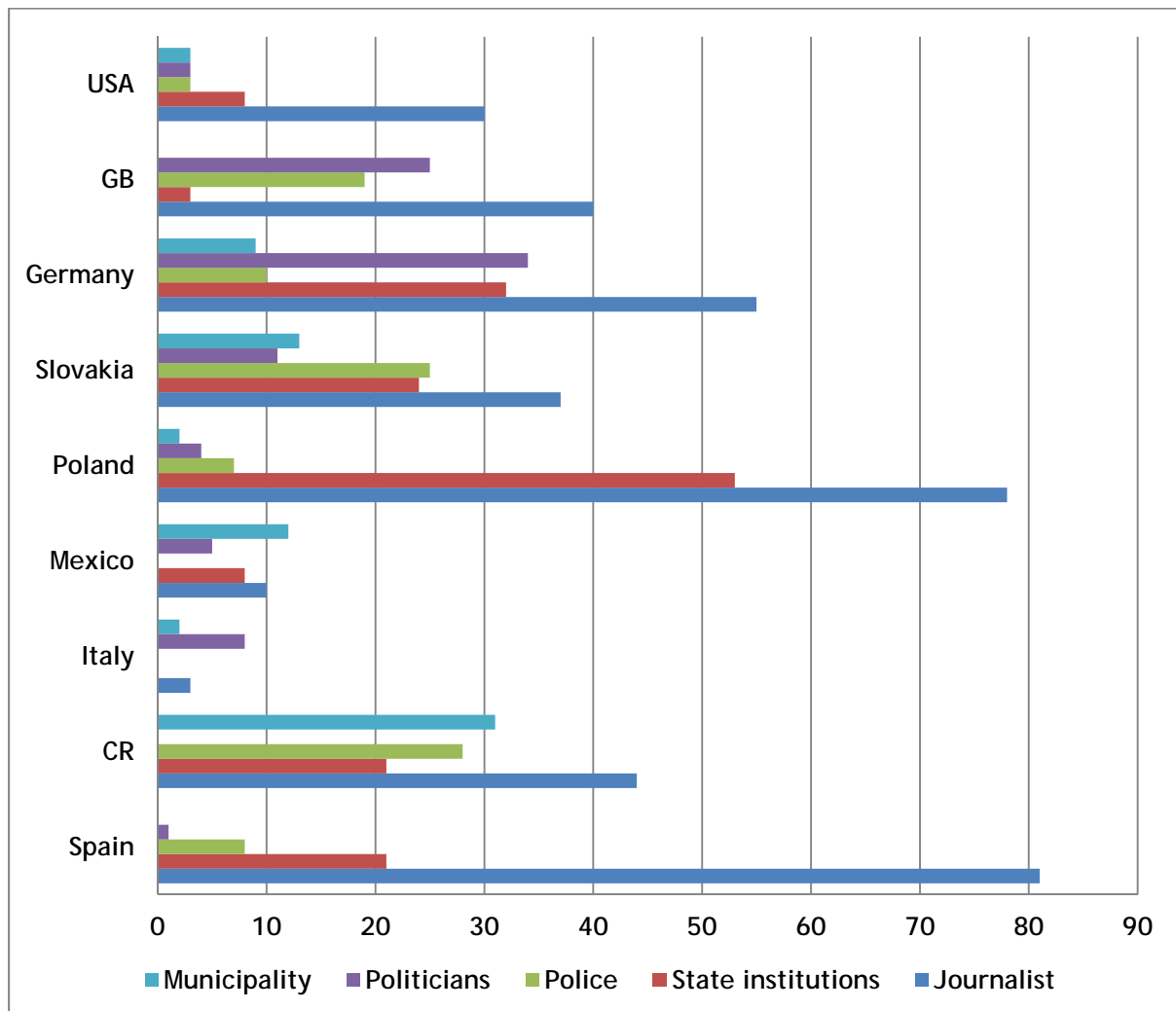
Source: SECONOMICS ISASCR, based on Table 14

Table 12: Overview of the most important actors in articles about CCTV cameras, 2010-2013

Actors	E	CZ	I	MEX	PL	SK	D	GB	USA	Total
	No.	No.	No.	No.	No.	No	No.	No.	No.	
Institutions	0	0	3	2	0	0	0	0	0	5
State institutions	21	21	0	8	53	24	32	3	8	170
Government security agency	3	0	0	8	1	0	0	0	2	14
Politicians	1	0	8	5	4	11	34	25	3	91
Municipality	0	31	2	12	2	13	9	0	3	72
Transport Company	0	19	0	5	0	0	0	0	0	24
City council	22	0	0	0	22	0	0	9	0	53
Police	8	28	0	0	7	25	10	19	3	100
Private company	0	4	0	19	6	10	1	1	9	50
Transportation Company	0	0	0	1	0	12	8	0	8	29

	E	CZ	I	MEX	PL	SK	D	GB	USA	Total
Advocacy Group/Civil society	0	4	0	1	0	0	6	9	6	26
Individuals	0	6	0	0	0	13	0	2	0	21
Journalist	81	44	3	10	78	37	55	40	30	378
Citizen/Passenger	11	6	3	0	4	30	0	0	12	66
CCTV Cameras	6	8	0	8	3	28	11	0	6	70
Experts	0	0	0	0	17	21	11	8	8	65
Activists	0	0	0	5	16	0	0	1	0	22
Others	0	0	0	3	14	37	7	0	3	64
Total	153	171	19	87	227	261	184	117	101	

Source: SECONOMICS ISASCR

Note: Top 5 actore in each country are marked in yellow

Table 13: Overview of argumentative strategies in the articles about CCTV cameras

Argumentative strategies	E	CZ	I	MEX	PL	SK	D	GB	USA
definitive	120	134	21	60	101	181	72	95	51
evaluative	14	40	4	16	97	62	117	16	38
advocative	4	3	7	8	30	16	1	7	10
Total	138	177	32	84	228	259	190	118	99

Source: SECONOMICS ISASCR

Table 14: Overview of direction of argument in the articles about CCTV cameras

Directions of argument	E	CZ	I	MEX	PL	SK	D	GB	USA
positive	14	29	9	17	65	57	41	6	25
negative	4	17	2	9	57	47	73	16	19
neutral	120	131	21	58	106	155	76	96	55
Total	138	177	32	84	228	259	190	118	99

Source: SECONOMICS ISASCR

Poland, according to the press articles, seems to be the strongest supporter of CCTV camera systems among the studied countries and that is why we will dedicate special attention to it here. Poland, together with Germany, has the highest share of evaluative and advocative strategies compared to the other analyzed countries, which points to broad discussion about this topic at their national level.

The title of the national report: "Poland -Surveillance Eldorado?" describes the Polish discourse quite well. This topic drew the most attention out of our three cases in Poland. The main actors providing statements, apart from "journalists," were "state institutions" and "city council" (75 codes together). On the other hand, "experts" and "activists" got significant space in the media as well. "Experts" included mainly professors and psychologists. "Activists" were represented by various organizations that advocate for human rights. Strangely, there are no actors from "transport companies" present in the debate about CCTV

cameras in Poland. "The issue of CCTV's use in public transport is virtually non-existent in the Polish debate, despite the fact that CCTV is present in Warsaw's buses and metro, as well as train stations" (Sojka 2013: 41). The reason is the fusion of public transport monitoring with the general public domain monitoring in the city. Because of this, there is no specific debate in the media about the transportation surveillance system. The CCTV camera discourse in Poland is led by state institutions and civil society actors. Citizens are rather marginalized in the debate. This is interesting compared to Slovakia, where the topic is perceived similarly. Slovakian "passengers" received much space in the media (30 codes, see Table 14). "Journalists," the single most important actor, also influence the debate. They don´t just inform, but also directly join the debate, offering evaluative statements. The role of "politicians" is of little importance, but due to the new law being prepared for regulating the use of monitoring systems in public places, it will probably increase in the near future.

The topic in Poland, as well as in the rest of the covered countries, is framed mostly in domestic terms with 97% actors being Polish (Sojka 2013). The topic is communicated by cities as a great achievement for public in Poland and therefore positive connotations towards CCTV cameras prevail in the statements. On this matter, the *Panoptycon Foundation* notes that "[in Poland] cameras are nowadays a symbol of social status. We are proud that we can use a camera to watch a nanny or a cleaner. Also a city that has public monitoring is considered to be modern. This is very interesting, as in the rest of the world the trend is quite the opposite" (Płociński 2012). The surveillance cameras are considered to be an important part of the process of modernization of Poland.

In Slovakia and the Czech Republic, the topic was also mostly framed by state institutions. The Slovakian press, however, gave a lot of space to "citizens" and "passengers," which was not very common in the rest of the countries, except for the USA. Slovakia and the Czech Republic could also be considered supporters of CCTV camera systems, based on their number of positive coded statements. Slovak acceptance of CCTV cameras probably derives from the relatively strict law regulating its use in public and private places. "The monitored premises must be visibly labelled and the video footage has to be deleted after seven days. The only exception is if it is required by the police in criminal investigations. The rules concerning the use of CCTV camera systems by individuals to monitor their private properties are even stricter" (Beláková 2013a: 43). "Municipalities," local mayors, the "police," and "passengers" or "citizens" were mostly in favour of the use of these devices, while psychologists turned out to be against them in most cases. "Citizens" tend to be more supportive of CCTV cameras when it is a question of crime prevention and crime detection, but they seem to be less in favour of them when they enter their private spheres. This appears to be an issue especially in regards to the installation of cameras in schools in Slovakia. Despite that, in Slovakia and the Czech Republic there were also agents pointing out their threats to privacy. The general approach of the two countries could be simplified by a statement from the Czech national report. "A qualitative content analysis of the two papers revealed that (the general view is that) increased surveillance is a fair price for strengthening security regardless of the trade-off, which is a decrease in privacy" (Gawrecká 2013). The Czech Republic, though, in contrast to Slovakia, lacks efficient legislation to protect privacy and regulate the use of CCTV cameras.

Germany, the strongest opponent of CCTV cameras, based on the use of negatively statements in the press, presents a slightly different approach to this topic. The most influential actors here are again state institutions, but we also hear a lot from "experts" as well. Surprisingly, there was not a single code for "passengers" or "citizens" assigned in Germany. The discussion of surveillance systems, however, seems to be quite advanced. While general opinion is rather negative compared to the other analyzed countries, there were voices in Germany criticizing the decreasing circumspection towards the security measures. "Peter Schaar [federal commissioner for data protection and one of the biggest opponents of CCTV cameras in Germany] determined that the surveillance of the citizen has "radically increased" and he expects "the end of privacy" (Nitzche 2013: 18). The acceptance of CCTV cameras in Germany slightly increased after a bomb was found at the main train station in Bonn, which is a development that can be seen in the United States as well. But as mentioned earlier, the increased tolerance of CCTV cameras in public places caused by dramatic events seems to diminish again as the time passes.

Contrary to the other two topics, where the United States was the leading country, framing the discourse for others, the CCTV controversy did not attract much attention there. Unlike in the other studied countries, the most cited actors there, apart from "journalists," were "citizens" or "passengers." In Mexico, Great Britain and Germany, for example, "passengers" didn´t get a single code. In the US, "passengers" was followed by "private companies," "transportation companies," "experts," and "state institutions." The US discussion was framed as unbiased, factual information. In evaluative or advocative statements, a positive direction prevailed. It is important to point out that there was almost no discussion about CCTV cameras in the USA until April 2013 when the marathon in Boston was disrupted by a bomb. CCTV cameras there played an important role by helping to track the suspects of the bombing. The public support of CCTV cameras then dramatically increased and the attack opened up the issue as a topic of discussion. It is interesting that American newspapers pay such little attention to the use of CCTV cameras if we take in account the fact that they are omnipresent in public spaces, inside shops, official buildings, or in the public transportation system. The increased salience of the topic was in the United States observed only after major terrorist attacks (Beláková 2013b).

CCTV camera systems attract significantly more attention in Great Britain. The main actors providing statements in our selected period were "journalists," followed by "politicians," "city council," and "police." A significant amount of space was dedicated to various "advocacy groups" and "experts" as well. According to Table 16, Great Britain belongs among the critics of CCTV system. The police and city councils, although the initially defended the camera systems, eventually decided to remove them in some critical areas. "We can fight crime and the threat posed by terrorism far more effectively by working hand in hand with local people, rather than alienating them through a technological solution which does not have broad community support" (Lewis 2010). However, the topic most present in the articles is the inappropriate use of CCTV, with a strong emphasis on privacy and civil liberties. Another big issue is the installation of CCTVs in taxis, triggering a major debate between civil rights groups and city councils. Despite its critics, the

British report points out that, "CCTV is fairly well accepted already in the UK, and the government itself understands the need for regulation to keep its use appropriate" (Caufield 2013).

Mexico provides another relatively distinct approach to CCTV cameras. As in the rest of the countries, the articles are mostly informative and cannot be used in the analysis. However, there is still a sufficient number of articles providing some discussion of public surveillance systems. Because of the troubled security situation in the country, CCTV cameras seem to be a good tool to help diminish citizens´ feelings of insecurity. Therefore the installation of CCTV cameras is a popular political and municipal theme which gives politicians points with the public. The most influential actor, though, are "private companies" who providemostly definitive statements, but also advocate for CCTV's use, as they have considerable amounts of money invested in the surveillance system all over the country.

In the two remaining countries, Italy and Spain, we didn´t capture any broader discussion or controversies going on in media. Both countries are supporters of this security measure, according to the positive coded statements. In Spain it seems that the topic drew quite a lot of attention, based on the number of published articles, but the debate about privacy and security was completely missing among the coded articles. The discourse in Italy was, as expected and compared to the other two topics, led by "politicians," while in Spain the dominance of state institutions was detected in the coded statements. In Italy, "citizens' risk assessments are largely affected by the political discourses and by the frequency with which these discourses are cited. Security related themes dominate in the debate and privacy is perceived as a price to pay to improve security" (de Gramatica 2013: 43). The last sentence of the citation at the same time essentially characterizes the general discourse among studied countries regarding security measures such as CCTV cameras or 3D body scanners at airports.

5.3.2 The most salient topics and justifications related to CCTV Cameras

The debate about CCTV cameras significantly differs in many respects from the debates about 3D body scanners and Stuxnet. There was no dominant country which shaped the debate in the European and worldwide context as the United States did in the case of full body scanners and Stuxnet. CCTV cameras were a more salient issue in the countries included in our comparison than 3D body scanners and Stuxnet. This interest can be explained by the fact that CCTV monitoring exists in all analysed countries. In other words, cameras became a domestic issue, which is more interesting for newspaper readers. Newspapers mainly reported on CCTV cameras within the domestic context, rarely quoting information from foreign media or press agencies.

Of all the countries analised, Poland wrote the most about CCTV cameras. There newspapers mentioned this topic 193 times and justified it in 74 cases. From Graph 11 and Table 17 we can see that the press in Spain and Great Britain approached CCTV cameras from informative perspective, often because of high interest in CCTV cameras themselves was reported in these countries (cameras were mentioned 152 and 137 times, respectively). Nevertheless, Spanish and British newspapers did not

often justify their arguments, so the debate about scanners was not as sophisticated as, for example, in Slovakia and Germany (which had 96 and 92 justifications of CCTV cameras, respectively). New member states of EU, such as Poland, Slovakia, and the Czech Republic, focused on this issue a lot, though they were not particularly interested in 3D body scanners and Stuxnet. On the other hand, the lowest interest and shallowest debate about cameras was reported in Italy and Mexico. The general trend is that the Mexican and Italian press also did not pay greater attention to other security issues, and mostly ignored the debate about the trade-offs between security and privacy.

Graph 11 shows that there were not very large differences between the topics related to CCTV cameras. This is in contrast to full body scanners, where the topic "body scanners" unequivocally dominated the whole sample. Regarding CCTV cameras, newspapers were generally interested most in their "purchase and installation." This topic was particularly salient in Spain, the Czech Republic, and Slovakia. On the other hand, the USA and Great Britain gave this issue almost no attention. The "purchase and installation" of CCTV cameras was mainly covered in shorter, more informative articles. Broader debate about the purpose of CCTV or its negative aspects was mostly missing. If articles contained justifications or the author´s opinion, the purchase and installation of cameras was evaluated positively as an effective tool in the fight against crime. In this context, it should be mentioned that "efficiency" and "crime prevention" were the most salient justifications for the whole issue of CCTV cameras (see Graph 12).

Interest in the cameras´ purchase and installation is typical for new EU member states, particularly Poland. Cameras became a symbol of social status and modernization. Citizens were almost proud of being monitored because they considered it to be modern. In other words, CCTV cameras were a part of the discourse of "catching up with the West" (Sojka 2013). Polish ombudswoman Irena Lipowicz commented this Polish pride in camera monitoring with following words: "In other countries at the entrance to a city you can see signs 'University city,' 'City of culture,' in Poland – 'Monitored city' – My foreign guests ask me why Poles are so proud of surveillance? Is it a post-communist trauma?" (Sojka 2013: 41).

Apart from this quote, articles from new EU member states did not link the communist experience with CCTV cameras and other surveillance technologies. Czech media sometimes described CCTV cameras using the term "big brother," but it was used just as a metaphorical expression which was not directly linked to communism. Moreover, the term "big brother" was often used in a neutral and sometimes even positive context. For example, one article was titled, "Thieves beware. Big Brother monitors you continuously in the streets" (Otipka 2011). In this and other instances newspapers mentioned the purchase of cameras as something that would protect citizens from crime.

In my opinion, a debate about communist surveillance would be appropriate. It could create new critical perspectives and it would remind citizens of the negative experience with state monitoring of public and private space in communist Poland and former Czechoslovakia. In fact, debate about the misuse of surveillance technologies in the totalitarian past took place in Germany, but in the context of the Nazi regime. It focused not only on a reflection of the past, but on the

prevention of the misuse of monitoring in the future.

The topic of "public domain monitoring" was salient for all observed countries except Italy and the UK (see Table 17). Like the "purchase and installation" of CCTV cameras, "public domain monitoring" was often connected with the justifications "efficiency," "crime prevention," and "privacy." Nevertheless, the negative aspects of monitoring were mentioned more often here than in previous topics. Together with the topic "public domain monitoring," newspapers in all the observed countries also mentioned "private domain monitoring." The attitude of the press towards "private domain monitoring" in schools, hospitals, work places, housing estates, and prisons were much more critical than towards the monitoring of public spaces such as streets, traffic infrastructure, or on means of public transport.[13] This difference between public acceptance and refusal of private monitoring was particularly visible in Slovakia, Poland, and Spain.

Two more important topics were "surveillance" and "security related rules and regulations," which were often mentioned together. The topic "security rules and regulations" was often connected with negative aspects of surveillance technologies, for example, endangering privacy. Here newspapers called for better legal regulations of CCTV cameras.

Similarly, the topic of "surveillance" often had negative connotations and was connected with a fear of losing privacy. This topic was salient in Poland, the Czech Republic, and particularly Great Britain. The British and, surprisingly, also German press called Britain a "surveillance state." For German newspapers Britain was a cautionary tale of surveillance and journalists warned the same conditions might come to pass in Germany. Newspapers pointed to sharply increasing number of CCTV cameras which invaded privacy. For instance, one article stated that, "in London, the average citizen is caught on CCTV cameras 300 times a day, and in the United Kingdom alone there are more than 4 million CCTV cameras" (Cavallaro 2007: 166).

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[13]Nevertheless sometimes it is difficult to distinguish between public and private domain monitoring.

Graph 11: Comparative assessment of salience by countries and main topics related to CCTV cameras 2010-2013
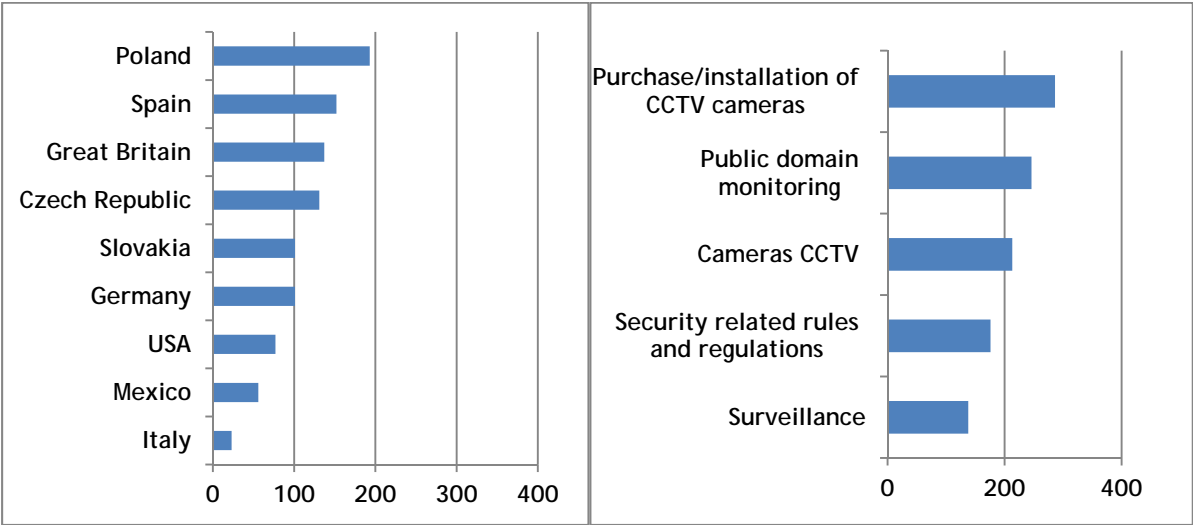
Source: SECONOMICS ISASCR

Table 15: Categorization of topics according to salience 2010-2013

	Purchase/ installation of CCTV cameras	Public domain monitoring	Cameras CCTV	Security related rules and regulations	Surveillance
high salience	Spain Czech Republic Slovakia	Spain Poland Slovakia UK USA Czech Republic	Germany Poland Slovakia UK	Spain Poland Slovakia UK	Czech Republic Poland Germany UK USA
medium salience	Mexico Poland Germany	Mexico	Mexico Czech Republic Italy Spain		Slovakia
low salience	UK USA	UK Italy	USA	USA Italy Mexico Germany Czech Republic	Spain Italy Mexico

Source: SECONOMICS ISASCR

Dominant justifications used by proponents of CCTV cameras were the "efficiency" of camera systems in the fight against crime, and their ability to strengthen

security. The above mentioned security aspects of CCTV cameras were salient for more than half of countries in our comparison: Germany, the USA, Spain, Poland, Slovakia, and the Czech Republic (for more details see Table 2). On the other hand, the efficiency of cameras was often questioned, similar to 3D body scanners. In Italy newspapers pointed to the fact that the camera's costs are often subsidized and that is why camera systems were sometimes installed regardless of their efficiency. Moreover, the evaluation of cameras' efficiency is often problematic because comprehensive international statistical data is not available.[14]

An interesting difference appeared between Germany and the English speaking countries and the rest of states included in the survey. In the USA, Great Britain, and Germany, cameras were considered a useful tool in the fight against domestic and international terrorism. The ability of cameras to prevent the future attack or help to track the perpetrators of terrorism legitimized the cameras' installation in public spaces. This interest in CCTV cameras as a tool to fight terrorism can be explained by the fact that the USA, Great Britain, and Germany have had the recent experiences with the terrorist acts or attempts.

In the rest of countries from the comparison, CCTV cameras were not primarily considered in terms of counter-terrorism, but they were considered to be efficient deterrents against acts of vandalism, robbery, pickpocketing in public transport, or as a tool for increasing safety on the road. Voices calling for higher security were particularly strong in Mexico where the security situation was the worst of all observed countries because Mexico was facing to the long-term problems with high crime rates and a war between drug cartels and police and even military (Vamberová 2013).

Regarding vandalism, two interesting aspects were mentioned. First, in Slovakia cameras were used to monitor vandals and hooligans in football stadiums. Second, the economic aspects of using CCTV cameras to fight vandalism was emphasized in the Czech Republic where newspapers pointed out that real estate prices rose if a place was monitored by cameras, because it was considered better protected from vandalism and inhabitants of an area felt more secure.

Despite relatively large support for cameras' installation, the negative aspects of monitoring were mentioned in the press of observed countries. The disadvantages of surveillance technologies were salient issue for almost half of countries from our sample (for more details see Table 18). Opponents of CCTV cameras often pointed to the fact that camera systems endangered our rights to "privacy" and personal freedom. Similar to 3D body scanners, issues of data storage and their potential misuse were mentioned. The right to privacy was particularly salient in Poland, Germany, and Slovakia, and some interest was also found in the British and US press. However, broad debate of the negative aspects of cameras' implementation was absent in Italy, Mexico, and the Czech Republic.

The international comparison of CCTV camera articles showed a difference in the development of topics and justifications over time among three groups of states: (1) old EU member states apart from Germany, (2) new EU member states and

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[14]On the other hand, partial police statistics from 2007 showed that, despite the prevalence of CCTV cameras in Great Britain, approximately 80% crimes still went unsolved (Davenport 2007).

Mexico, and (3) the United States and Germany. First, CCTV cameras in old EU member states, such as the United Kingdom, Italy, and Spain, were installed at the end of last century or even earlier. Therefore citizens were familiar with them and they were mostly aware of their pros and cons. Despite of this fact, we can observe some regional differences between Great Britain, which is slightly more critical of the cameras, and Southern European countries, which seem to have almost no criticism of surveillance, but instead emphasize cameras' advantages. A good example of this is Italy, where the lack of a critical perception of cameras is a result of people considering CCTV to be a common part of their lives and did not question their purpose. Despite the above mentioned regional differences between the UK, Spain, and Italy in the justification and evaluation of cameras, no substantial differences in development of the debate over time were reported. In other words, British, Italian, and Spanish newspapers used the same topics and justifications from 2010 to 2013.

On the other hand, an interesting development of topics was visible in new member states and in Mexico. In these countries, CCTV cameras were not so established because cameras were installed in public spaces later. In 2010 and 2011, newspapers in Poland, Slovakia, and the Czech Republic focused on CCTV cameras themselves, their purchase and installation, and their efficiency in crime prevention, detention and solution. By 2012, the debate became more sophisticated and deeper. Newspapers questioned the efficiency of cameras, pointed to the lack of privacy, and emphasized the need for clear legal regulation for CCTV cameras. This change in the style and content of the articles published in 2012 is indicated by the titles of articles. A good example of this trend is represented in the Polish left-leaning paper, *Gazeta Wyborcza,* which published the following articles in 2012: "One can see everything," "Poles watched," and "We need courage, not cameras" (Sojka 2013).

The situation in the USA was different. CCTV cameras there became a salient issue after the attack on the Boston Marathon in April 2013. "Public discussions about the benefits of surveillance only really started after the tragic Boston Marathon bombing of April 2013, when CCTV footage proved crucial in tracking down the suspects" (Beláková 2013: 53). Newspapers paid CCTV cameras almost no attention before this attack, despite their ubiquity in public spaces. This fact supports the theory that citizens are interested in methods of surveillance particularly when they feel endangered. Moreover they are willing to sacrifice their civil rights and freedoms substantially, in return for feeling safe and secure. This trend illustrates well the following data from a New York Times/CBS News opinion survey which took place only a week after the Boston attack. According the survey, almost 80% respondents considered CCTV cameras to be a good idea (Beláková 2013).

To a certain extent, a similar situation happened in Germany after a bomb was found in the main Bonn railway station in December 2012. Citizens' interest in CCTV cameras increased in Germany and their attitudes, which were mostly critical before the attack, improved. Nevertheless, that difference was not as strong as in the USA. German attitudes towards CCTV cameras and others tools of surveillance was much more cautious than in the USA. Hesitancy is typical feature of the German security debate and it is sometimes described with term "Deutsche Angst"

(German hesitancy). We can find more examples of these attitudes in recent German security policies such as "the requirement of an extension of Google Street View to hide whole buildings (Germany was the only country that stopped the expansion of Google Street View)... anxiety in subjects such as H5N1 avian influenza, BSE or the risks of nuclear power plants" (Nitzche 2013: 10).

Graph 12: Comparative assessment of salience by countries and main justifications related to CCTV cameras 2010-2013
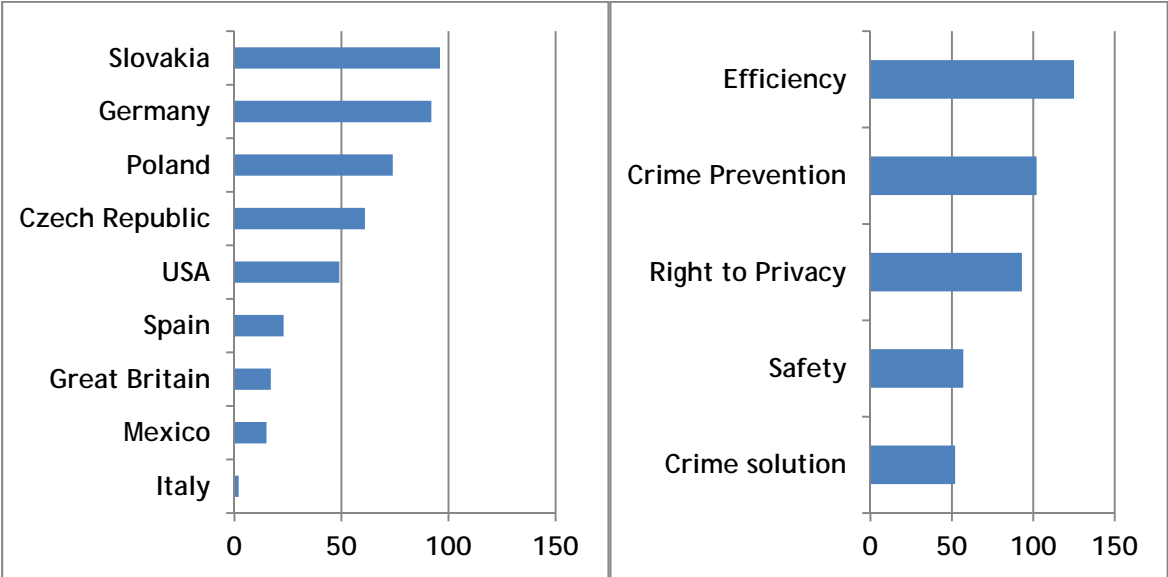
Source: SECONOMICS ISASCR

Table 16: Categorization of justifications according to salience 2010-2013

	Efficiency	Crime Prevention	Right to Privacy	Safety	Crime solution
high salience	Spain Slovakia Germany USA	Spain Czech Republic Slovakia Germany	Poland Slovakia Germany	Poland Slovakia	Spain Germany USA
medium salience	Spain Czech Republic UK	Mexico Polnad	UK USA	Germany USA	Slovakia
low salience	Italy Mexico	Italy UK USA	Spain Czech Republic Italy Mexico	Spain Czech Republic Italy Mexico UK	Italy Mexico Poland Czech Republic UK

6. Summary

6.1 The most salient actors and argumentative strategies related to 3D body scanners, CCTV camera systems, and Stuxnet

The three topics that we included in the analysis didn´t attract the same level of attention among the studied countries. The United States acted as a leading country in the case of 3D body scanners and Stuxnet, setting the discourse for the rest of the countries that we have analyzed. On the other hand, in the third analyzed topic the US played only a marginal role. CCTV cameras drew major attention and controversy in Poland and Germany. Poland is among the strongest supporters of CCTV cameras, while German articles argued mainly against these devices.

Table 17: Dominant actors in the analyzed countries for CCTV cameras, Stuxnet, and 3D body scanners

Actors	CCTV cameras	Stuxnet	3D body scanners
Journalist	Spain Czech Republic Poland Slovakia Germany Great Britain USA	Spain Mexico Poland	Spain Czech Republic Poland Great Britain
Experts		Italy Germany Great Britain USA	Czech Republic
State institutions			Mexico Poland
Politicians	Italy		Italy Germany
Private company	Mexico	Czech Republic	

Transport Security Agency			Czech Republic USA

Note: More than one dominant actor in the country means that there were more actors with the same amount of codes

In Table 19 we can see the actors that dominated in the analysed countries. In the case of CCTV cameras, journalists dominate. They were the most important actor in seven countries. In Italy, politicians' statements prevail, which is typical for all of the 3 analyzed topics in Italy. Stuxned, on the other hand, is framed mainly by "experts," which we can see in the dominance of this actor in four countries. In the debate about 3D body scanners, many different actors were involved and dominance is not so clear.

Table 18: Above-average occurrence of argumentative strategies in analyzed countries for CCTV cameras, Stuxnet, and 3D body scanners

Argumentative strategies	CCTV cameras	Stuxnet	3D body scanner
Definitive	Spain Czech Republic Poland Slovakia Great Britain	Spain Slovakia Great Britain USA	Spain Great Britain USA
Evaluative	Poland Slovakia Germany	Germany USA	Germany USA
Advocative	Poland Slovakia USA	Great Britain USA	Spain Italy Slovakia USA

Note: Countries that dominated in each category are highlighted

Regarding argumentative strategies, there was definitive and neutral argumentative styles dominated in all the three cases. However, the discussions about 3D body scanners and CCTV cameras in the press contained quite a high number of evaluative strategies as well. Only Stuxnet can be seen as almost strictly framed in definitive and neutral way. That is understandable, as the topic is remote from the general public due to its technical character, so it must be introduced to the audience first by giving an explanation of what is actually going on. Table 20 shows the above-average use of particular argumentative strategies in the three topics. That is, which country used the distinct category of argumentation more,

compared to the other countries. In the case of evaluative and advocative statements, it shows us where the discussion about a distinct topic developed the most and where the character of the articles was only informative.

The United States is indisputably the leading country in the debate about 3D body scanners according to the number of different actors providing the statements in the press. The discussion there opened after the failed terrorist attack on the Detroit-Amsterdam plane in 2009. The most influential actor providing statements in the US is the Transportation Security Administraion arguing for implementation of body scanners. A lot of space in the media is given to "experts" who mainly speak about the health risks of the scanners and evaluate them negatively. The rest of the countries mostly react to events in the US. In Great Britain and Spain, journalists themselves have a strong voice in the statements. Italy is an exception, as, once again, "politicians" have the greatest voice in the media debate. Slovakia, Poland, the Czech Republic, Spain, and Mexico did not pay much attention to this issue, based on the number and quality of articles their newspapers published. They mostly just reprinted US or other foreign articles and reported on the cases facts alone, without analysis. Great Britain and Italy can be seen as supporters of this technology within the EU, while the rest of the analysed countries evaluate it rather negatively, based on these articles. It is important though, to discuss this topic at the European level. The regulation of the use of 3D body scanners is now in the hands of the member states, but, considering these devices' weaknesses, it would be helpful to settle some common criteria for the entire EU.

Of out three topics, Stuxnet is special. It is not directly relevant to the public, but does potentially herald unprecedented consequences on their lives. Therefore, it is desirable for people to be informed of these issues. Stuxnet as a news story began in 2010 with its cyber-attack on an Iranian power plant. At the beginning it was framed almost entirely in a definitive way. The leading actors in the statements were "experts" and various state officials from Iran and the United States. As time passed, the debate moved from specific happenings to a more abstract level, discussing potential cyber war and including a wider variety of actors who were not strictly experts. The evaluative strategies used in the articles about Stuxnet were mostly negative, but we can say that generally the countries apart from the US played the role of a detached observer, rather than forming any significant opinion on the case. The only exception was Mexico where some articles included a fear of being similarly targeted in the future, identifying itself rather with the victims than with the perpetrators of the attack.

The last topic, CCTV, drew great attention among the studied countries, and the roles of the leaders in the debate changed completely in comparison to the other two topics. The USA, unlike in the other two cases, did not play any important role. CCTV cameras apparently do not cause major controversies there. They attracted more attention only after the attack on the Boston Marathon in April 2013 when they helped identify the culprits. The leaders of the debate about CCTV cameras among our selected countries were Poland and Germany, who expressed completely opposite sentiments. While Poland considers CCTV to be positive, viewing it as a part of the country´s modernization, Germany considers CCTV to be negative and a threat to privacy. The main actors providing statements in the articles about CCTV, apart from journalists themselves, were various state

institutions. In Italy, again, we observed a strong preponderance of politicians providing information and opinions about CCTV cameras. In Mexico the most frequent actors were "private companies" who installed CCTV devices. The debate about CCTV cameras is mostly framed in domestic terms and is relatively distinct in each of the analyzed countries. It is dependant on cultural differences, differing security situations, and past experience with terrorist attacks.

6.1.1 The most salient topics and justifications related to 3D body scanners, CCTV camera systems, and Stuxnet

An overview of the total number of topics and justifications for all three security issues shows us that the greatest media attention was paid to the 3D body scanners, while newspapers in the observed countries focused least on Stuxnet. Nevertheless, the distribution of the number of topics was relatively equal among all three security issues (see Graph 13).[15] In fact, bigger differences appeared in the frequency of justifications when low number of justifications was typical for articles about Stuxnet, compared to the relatively high number of justifications in the case of CCTV cameras and 3D body scanners (see Graph 14).[16]

Graph 13: Total number of the most salient topics related to 3D body scanners, CCTV cameras and Stuxnet in 2010-2013
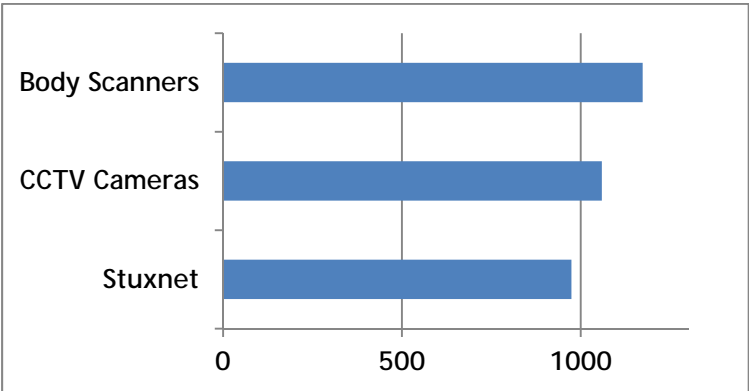
Source: SECONOMICS ISASCR

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[15]The five most salient topics related to Stuxnet were mentioned in total 974 times. In the case of CCTV cameras, it was 1059 times, and 1173 times in articles about 3D body scanners.

[16] The number of justifications used in the articles about CCTV cameras and 3D body scanners is relatively similar (429 justifications for cameras and 493 for body scanners), while Stuxnet was justified in only 168 cases, which was almost three times less than in the previous two topics.

Source: SECONOMICS ISASCR

As mentioned above, newspapers paid the most attention to 3D body scanners. Nevertheless, we should take into account that this fact was a result of the great interest in this topic in the USA, which significantly shaped the debate and media perception of scanners. In fact, for most countries scanners were a foreign, rather than domestic, concern, and so it was not interesting topic for a relatively high number of other states included in our comparison. It is no surprise that 3D body scanners were salient particularly in the countries where scanners had been implemented (the United States, Great Britain, and Germany) and for the countries with recent experience with the terrorist attacks (the United States, Great Britain, and Spain). The issue of body scanners was also more important for the old EU member states and the USA than for new member states and Mexico. The most sophisticated debate about 3D body scanners took place in the United States, while less attention to this issue was paid in Mexico and Poland.

In most of the countries newspapers focused on the trade-offs between security, privacy, and health. Much attention was paid to the "security rules and regulations," "installation of scanners," and the description of scanning procedures. On one hand, body scanners were justified by their "efficiency" (which was in some respects questioned). They were also considered as useful tools for anti-terrorism. On the other hand, newspapers mentioned that the price paid for security was sometimes too high. Daily papers also focused on negative aspects of scanners´ installation, such as the threats to "privacy," dignity, and freedom, and they also wrote about the increased discomfort of air travel and lesser "quality of service."

CCTV cameras were the second most-discussed issue, in terms of its total media coverage. In fact it was a more salient issue for more countries included in our comparison than 3D body scanners and Stuxnet. The reason for this was that CCTV cameras were a domestic issue and that is why they were also interesting and relevant for newspaper readers. No single country dominated or shaped the debate in Europe or worldwide, as the United States did in the case of full body scanners and Stuxnet. CCTV cameras were even not particularly salient topic in the United States.

The most attention to CCTV cameras was paid in Poland, and then followed by

Spain, Great Britain and the Czech Republic. It is interesting that new EU member states, such as Poland, Slovakia, and the Czech Republic, focused on this issue a lot, while they were not particularly interested in 3D body scanners and Stuxnet. The least interest and shallowest debate about CCTV cameras was reported in Italy and Mexico. The Mexican and Italian press did not exhibit greater attention to 3D body scanners, but their media coverage of Stuxnet was an interesting contribution to the debate about the virus.

Regarding CCTV cameras, newspapers were generally most interested in their "purchase and installation," "security rules and regulations," and "surveillance." The topic "security rules and regulations" was often connected with negative aspects of surveillance technologies, such as endangering the people´s privacy. In this regard, newspapers called for better regulation of CCTV cameras. On the other hand, the purchase and installation of cameras was evaluated positively as an effective tool in the fight against crime by cameras' proponents. "Efficiency" and "crime prevention" were among the most salient justifications for CCTV cameras. Nevertheless, the efficiency of cameras was often questioned, similar to 3D body scanners.

Interesting differences appeared among English speaking countries and Germany and the remaining states included in the survey. In the USA, Great Britain, and Germany cameras were considered a useful tool in the fight against domestic and international terrorism. In the remaining countries from the comparison, CCTV cameras were not primarily used for counter-terrorism, but they were considered efficient deterrents against acts of vandalism, robbery, pickpocketing in public transport, or as a tool for increasing safety on the road.

Stuxnet received the least attention. The reason for the relatively low media coverage of Stuxnet could be that, unlike 3D body scanners and CCTV cameras, Stuxnet is not a technology which directly affects the daily life of common people. That is why information about Stuxnet is not so interesting to the general population. But as in the case of 3D body scanners, the USA was the leader of the debate, followed by Germany and Slovakia.

The articles describing Stuxnet were longer, more detailed, and contained the opinions of experts more often than the articles dealing with the functions of CCTV cameras and 3D body scanners. The prevailing topics were "Attack on Iran," "Iranian enrichment uranium programme," and "Deployment attack using Stuxnet." Newspapers also speculated about the origin of the virus. The issue of Stuxnet was framed in terms of the global cyber security context, industrial espionage, and cyber war. Newspapers wrote about the wider consequences and negative effects of the Stuxnet attack on geopolitical stability, such as the possibility of a counterattack. They also discussed the legitimacy of cyber-attacks in regards to international law. In Mexico papers even ventured to understand the events from an Iranian perspective.

Regarding the justifications, the proponents of Stuxnet appreciated the complexity and efficiency of the virus and emphasized security. They considered this virus to be a quick and non-violent weapon useful for a preemptive strike which could prevent the development of weapons of mass destruction. On the other hand,

concerns about virus's uncontrolled proliferation and the possible threat of counterattacks appeared in 2011 and 2012.

7. Conclusion

In the qualitative comparative analysis, we have concentrated on the important role of media in political communication - both transmitting information and shaping opinions on key security issues (case studies include cyber terrorism as an example of risk and 3D body scanners and CCTV cameras as examples of security measures, although as mentioned before, some media framed Stuxnet as a security measure). The main factors shaping the reporting on terrorist threats and security measures are past experience with a particular security threat, as well as the probability of a country being targeted in the future. These factors account for the main differences in the extent of coverage dedicated to an issue in the domestic media.

In this report, we hoped to fill an existing gap in the study of terrorism and security risks by concentrating on a comparison of the coverage of transnational issues in the media outlets of ten countries. We found that the media landscape is undergoing a transformation as the importance of the international context grows. Furthermore, the British and German cases show that the media is shifting from a focus on security threats to an awareness of possible trade-offs posed by security measures in terms of health, privacy, and freedom. Terrorism and organised crime are increasingly framed as transnational and beyond the scope of nation-states. The public is becoming more sensitive not only to threats, but also to the costs of security. The media plays a key role in shaping political communication and public attitudes. The media fulfils its informative and educational functions, and increasingly provides a platform for public political discourse, including the provision of space for the expression of dissent. The media is also a channel for political advocacy, such as for the need for regulation or the adoption of security measures. It also, though to a significantly lesser degree, acts as a 'watchdog' or guardian of freedoms.

To conclude, we can state that the balance of security and freedom is the crucial task of contemporary governments. The role of conscientious media as a platform for public political discourse and a guardian of freedoms is gaining considerable importance.

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