



# Contextual Cues to Meaning in Communications Law and First Amendment Jurisprudence: True Threats and Beyond

Context is pivotal in many facets of communications law in the United States. For instance, the current test for obscenity created by the U.S. Supreme Court in *Miller v. California*, 413 U.S. 15 (1973), requires that a magazine, movie, book, or other media artifact be “taken as a whole” by jurors in deciding whether it appeals to a prurient interest in sex. In other words, a single photograph, movie scene, or paragraph cannot be wrenched out of context. This context-based approach to obscenity partly explains why adult magazines such as *Playboy* and *Hustler* long have included serious political articles and social commentary in their pages.

The same holds true for the importance of context when the Federal Communications Commission weighs whether a television show or radio broadcast is indecent. A word such as “fuck” may be considered indecent if it is repeatedly used on an entertainment program to shock, pander, or titillate an audience. The FCC almost certainly won’t deem the same word indecent, however, if a politician is caught on tape uttering it about an opponent and the tape airs later as part of a news story addressing how the politician feels about and treats his opponents. Furthermore, those who closely follow the FCC have identified an unwritten, context-based “Spielberg Exception” from the Commission’s indecency rules for movies such as *Schindler’s List* that feature nudity and *Saving Private Ryan* that involve repeated swearing. Nudity and expletives in such serious fare that aims for blunt realism are shielded from indecency proceedings, whereas Janet Jackson’s infamous nipple slip during the 2004 Super Bowl halftime show is not.

Defamation law is similar. Whether a statement conveys a defamatory meaning or is one of fact rather than opinion requires evaluating an article as a whole and the context that surrounds it. As the U.S. Court of Appeals for the District of Columbia wrote in *Farah v. Esquire Magazine*, 736 F.3d 528 (D.C. Cir. 2013), context in libel law “includes not only the immediate context of the disputed statements, but also the type of publication, the genre of writing, and the publication’s history of similar works.” Along this same line, courts increasingly recognize that speech posted on social media platforms such as Twitter and Facebook is often loaded with rhetorical hyperbole that is not intended as a factual assertion. For example, a federal district court in 2018 dismissed a libel suit filed by adult-movie actress Stephanie Clifford (better known by her stage name Stormy Daniels) against President Donald Trump

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