

TELECOMMUNICATIONS INTERCEPTION: British and American variants of intelligence terminology

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ABSTRACT

Terminology and, most importantly, standardized terminology, play a substantial role when it comes to communicating within an international community. One such instance is the inter-institutional communication within the intelligence community, where English is considered the lingua franca. The dilemma arises when the sender of the information has to choose between words bearing comparable connotations in British English and American English, occurrences labeled as linguistic variants. This article looks into some of the terms coined within the legislation on lawful interception of communications in the United States of America and the United Kingdom, which, regardless of their linguistic structure, serve a similar purpose in relation to semantics. It discusses the circumstances that might have caused these differences in terminology and focuses on the history of the intelligence agencies in these two countries in conjunction with how American English began to wander from the original language imposed by the settlers. Although the two countries nowadays enforce different laws and regulations on interception, it is still possible to compare and discuss specific terms and concepts from a sociolinguistic perspective.

Keywords: terminology; interception; American English; British English; comparative analysis.

Introduction

Terminology, with its primary meaning of “technical or special terms used in a business, art, science, or special subject” (Merriam-Webster, 2025) is a predefined set of items employed by individuals in a given domain in order to communicate effectively with each other. Sager (1990) offers a more exhaustive definition, focusing on how terms restrict their meaning in specialized contexts:

The lexicon of a special subject language reflects the organizational characteristics of the discipline by tending to provide as many lexical units as there are concepts conventionally established in the subspace and by restricting the reference of each such lexical unit to a well-defined region (p. 19).

A secondary, and more recent meaning outlines that terminology refers to “nomenclature as a field of study” (Merriam-Webster, 2025). This secondary meaning emerged from the necessity of establishing a title for the field of terminology research.

In the same way that Ferdinand de Saussure is known to be the father of semiology and Noam Chomsky to be the father of generative grammar, the pioneer of terminology is believed to be the Austrian terminologist Eugen Wüster. His first research endeavors focused on laying the foundations in the field of terminology standardization by publishing a doctoral dissertation titled *Internationale Sprachnormung in der Technik, Besonders in der Elektrotechnik. (Die Nationale Sprachnormung und ihre Verallgemeinerung)* [International Standardization of language in the technical field, especially in electrical engineering (National language standardization and its generalization)] (1931). In the context of Chomsky’s emerging structuralist theories, Wüster was instead focusing his research on the link between objects and concepts (Hjørland, 2023). The main framework within the field of terminology research is believed to be Wüster’s posthumous book, *Einführung in die Allgemeine Terminologielehre und Terminologische Lexikographie* [Introduction to general terminology and terminological lexicography] (1979), by means of which he marked concepts as terminology’s main point of research rather than focusing on natural language, which, in the author’s opinion, can vary. Wüster’s research in the field of terminology has led to the establishment of *Technical Committee 37* (1947) within the former *International Standardization Association* (ISA), whose objective was to adopt a more unitary approach towards specialized terminologies (Hjørland, 2023). Since

terminology falls within the wider domain of humanities research, standardization could be deemed as an out-of-reach objective, but there are many institutions involved in the process. For example, in the United States, the activity of developing and adopting standards is handled by the *American National Standards Institute* (ANSI). At the same time, the British equivalent institution is the *British Standards Institution* (BSI) and the Romanian equivalent is the *National Standardisation Body* (ASRO), all of which are official members of the *International Organization for Standardization* (ISO).

The theories that emerged in the following years were the social and communicative terminology theories and the cognitive-based theories of terminology, classified as descriptive in comparison with Wüster’s prescriptive approach (Faber & López Rodríguez, 2012). Prescriptivism versus descriptivism in the field of terminology is still a topic for debate, with Hjørland (2023) believing that an answer to the question has yet to be given. He wraps things up by highlighting the importance of examining terminology in the context of what we know in the present in a particular area of study, rather than settling on a specific theoretical approach. As it is quite clear, establishing a framework for terminology research has been a constant work in progress as the domain strives to differentiate itself from the fields of lexicography and logic.

Some published articles on terminologists’ methodology have established the starting point of all terminology research projects to be the constant need for communication within a socio-professional category (Dobrina, 2015). Other authors focused on categorizing the different types of research projects (Heribert & Draskau, 1985) which could be conducted within a specific area of work and which resulted in 4 different groups conditioned by the current stage of a terminology project: a) the development of a first research in a particular field, b) the addition of one or more languages to an already existing research without altering the original number of terms, c) the completion of existing terminology; and d) its revision. When drafting a research project in the field of terminology it is also essential to establish elements such as the need the research project caters to, the objectives pursued, the target group and the properties of the already existing terminology, the concept by which the overall vision is understood, the type of terminological information presented, the research direction, and the type of research that is going to be conducted (Dobrina, 2015).

The main topics of this paper are the creation of a small-scale lexicon and the analysis of intelligence terminology in the context of two English-speaking

nations’ legal systems. Given the fact that each variety of the English language has traits unique to the nation’s growth and sense of identity, there is little question that such phenomena have an impact on the process of enforcing rules and regulations. The same concept applies to the language used to communicate particular concepts and scenarios to the general public. This naturally raises the question of which type of terminology research could improve inter-institutional communication within the intelligence community. One plausible candidate is the development of a glossary, and in particular, one of the English variants in this specific field of activity, which could serve as a guideline for translators and interpreters across the intelligence community. The method employed while conducting this terminology research will be comparative analysis, and we will evaluate the degree of semantic equivalence by also looking at the historical background of the legal framework in question.

The Anglosphere within the intelligence community

While globalization has definitely played a role in shaping intelligence-related activities, remarkably in the context of strategic partnerships and international alliances, national identity has kept its place as a crucial part of each agency’s specifics. It would have been peculiar for the intelligence agencies to evolve apart from the historical and political circumstances of the country where they carry out their activity; so, they each keep a part of their history in their efforts for constant development, be it technology or methodology related. A case of such differences in the process of intelligence advancement are the United States and the United Kingdom: the first one has been acknowledged worldwide for its technological developments within fields related to signals intelligence (SIGINT); while the second one owns its reputation as an espionage powerhouse from its imperialist era for wisely maneuvering its human sources (HUMINT). Their strategic team-up on breaking codes during World War II was what really made them close partners. On March 5, 1946, they went and signed the UKUSA agreement, which truly established their alliance (Holzer & Gibson, 2023). Over the next ten years, history showed that the United Kingdom could get all the major English-speaking countries to join forces to create a strong alliance with one main goal: to keep the West safe from the big bad wolf, communism. The countries that later joined the agreement were Canada (1948), and ten years after the initial signing of the agreement, Australia

and New Zealand (1956) joined the alliance, resulting in what is now known as the Five Eyes. This was shown in 2018 with a study done by *The Lawfare Institute* (Kim et al., 2018) that exposed how intelligence agencies such as the Government Communications Headquarters (GCHQ) in the United Kingdom and the National Security Agency (NSA) in the United States were keeping tabs on each other’s people. The aforementioned study backed up the idea that the member countries were abusing their partnership in an attempt to bend national rules and regulations.

Lawful interception: American English versus British English

American English and British English have quite a few differences in vocabulary, amounting to around 4000 within the base vocabulary alone (Davies, 2005). Observing the differences between the two English varieties through a historical scope points us to the period of time when the Americans severed the ties with the British colonists (the American War of Independence, 1775-1783). After the initial influx of British settlers, subsequent migrant influxes, such as those from the Dutch, German, and French, also left their unique mark on the newly formed nation of America, influencing its language and cultural landscape and making American English its own special blend. These developments caused early American linguists to predict that British English would evolve into a more distant relation of the emerging American dialect. Back in the day, Noah Webster (1789) believed that over time the two English varieties would eventually lose their commonalities and become as close as the other Germanic languages, such as German, Danish, Dutch, and Swedish. Following this era of linguistic diversification, a standardization process took root, which is believed to have commenced after the height of lexical richness between British and American English, likely occurring around World War II (Davies, 2005). It is no surprise that the domains that saw the most significant lexical changes are the ones that really took off during the Industrial Revolution, which was roughly between 1760 and 1840. These sectors encompass telecommunications, transport, energy, education, health, governance, and the production and distribution of food and apparel.

There are a number of linguistic disparities between British and American legal terminology pertaining to interception, which may be explained by the development of telephones and other communication

tools throughout this period in history. For the purpose of our comparative analysis, the preeminent piece of legislation in the United Kingdom is the *Investigatory Powers Act of 2016* (The National Archives, 2016), with particular emphasis on its second section addressing the lawful interception of communications. Our endeavor to identify a comparable law governing interception in the United States presented us with various challenges. This was because the United States' laws governing interception are rather scattered across a number of acts, such as the *Federal Wiretap Act* (1968), *the Electronic Communications Privacy Act* (ECPA, 1986), *the Foreign Intelligence Surveillance Acts* (FISA, 1978), *the USA Patriot Act* (2001), and *the Freedom Act* (2015). *Title 18, Chapter 119 of the United States Code* (United States Congress, 2011) on the interception and disclosure of wire, oral, or electronic communications is the section we have chosen for our research since it makes reference to both FISA and the ECPA. Once we have found the word pairs that have the same meaning in the texts we chose for our corpus, we will take a closer look at each case to figure out what sets apart the different choices of words people use to express similar or identical concepts:

1. warrant (British English) versus court order (American English)

A *warrant*, as used in British English, is a legal authorization that empowers law enforcement, intelligence, or other authorized organizations to intercept, monitor, or gather data under specified conditions. While the definition of the term *warrant* in American English is almost identical to the one found in British English, it is more commonly used in relation to criminal investigations linked to the police as opposed to intelligence operations, which are particular to secret agencies. *Warrant* can also be used in particular legal authorization names, such as the *FISA warrant* in the United States. However, the United States Code uses the collocation *court order*, or its abbreviated form, *order*, to refer to interception and intelligence services' operations. We find it relevant to note here that, within the *Investigatory Powers Act* (The National Archives, 2016), three types of warrants are mentioned: *targeted interception warrant*, *targeted examination warrant*, and *mutual assistance warrant*. The United States' legal framework does not have direct equivalents for these types of *warrants*, all of them being addressed under the umbrella term *court order*.

2. bulk interception (British English) versus mass surveillance (American English)

One of the few nations that permits this kind of surveillance and strictly regulates it is the United Kingdom.

Mass surveillance, also known as *bulk interception*, is the practice of gathering communications data on a broad scale, including emails, phone conversations, and internet traffic. *Bulk interception* is legal in the United Kingdom under the *Investigatory Powers Act 2016* (The National Archives, 2016), while in the United States, the legislation raises more ambiguities, with various concerns surrounding NSA programs using bulk data collection. This surveillance measure was authorized by legislation like the *Patriot Act* (United States Congress, 2001), for countering terrorism, which was later updated and modified by the *Freedom Act* (United States Congress, 2015).

3. telecommunications (British English) versus wire, oral, electronic communications (American English)

What is truly interesting is the United States' legal framework dividing communications into three categories: *wire*, *oral*, and *electronic*, while there is no such distinction under British law. As an alternative, the British law views all communication methods as belonging to the more general category of *telecommunications*. The collocation *wire communication* in American English derives from the 19th-century telegraph and telephone systems, in which sound was transmitted through physical links such as wires and cables. Due to the legal system's commitment to historical precedent, this collocation is still used in American legal language even though the majority of current communications are now wireless. The term *oral communication* covers in-person discussions, an activity that has spread with the boom of surveillance technologies and wiretapping in the 20th century. *Electronic communication* is a relatively contemporary word used to describe communication that does not fall within the old definition of wired communication. It was included in the *United States Code* in 1986 through the ECPA to address the emergence of e-mail, text messaging, and other digital communication. The British legal system, on the other hand, favors wide, technology-neutral definitions, guaranteeing that all oral, written, and digital forms of communication are covered by a unitary legal framework.

4. telecommunications operator (British English) versus communication common carrier (American English)

Both collocations *telecommunications operator* and *communication common carrier* are used to name a business or organization that delivers telecommunications services, including voice, data, and internet access to its users. In British English, the term operator is employed to name the company offering these services, a term that has

been prevalent in the field of telecommunications since the 19th century (Etymonline, 2025). In contrast, American English favors the *word carrier*, which originated in the 16th century from *letter-carrier*, formerly used in relation to postal services, and which has subsequently evolved to include other types of communication service providers (Etymonline, 2025). We can, however, notice the use of the same root word, *communications*, which covers all forms of transmitting messages. Prior to the updates made by ECPA (1986), the American legal language employed the noun phrase *provider of wire or electronic communication service*, which we nowadays deem rather long and unnecessary.

5. secondary data (British English) versus non-content information (American English)

Terms such as *secondary data* and *non-content information* are often viewed as synonymous, as they are used to express the concept of data associated with a communication without making use of its content. In order to understand what the term *content* is not, we should first of all understand what it is: “«Content» means (...) any element of the communication, or any data attached to or logically associated with the communication, which reveals anything of what might reasonably be considered to be the meaning (if any) of the communication” (Investigatory Powers Act, 2016). This definition will allow us to observe how the meaning of what is deemed as non-content information has changed over the years under the British law. The collocation *related communications data* (Regulation of Investigatory Powers Act, 2000) got replaced with *secondary data* (Investigatory Powers Act, 2016). According to British law, *related communications data* ”means so much of any communications data (...) as—(a) is obtained by, or in connection with, the interception; and (b) relates to the communication or to the sender or recipient, or intended recipient, of the communication” (Regulation of Investigatory Powers Act, 2000); while *secondary data* encompasses *systems data*, as well as data related to the communication, which while separated from the communication do not disclose any of its meaning (Investigatory Powers Act, 2016). While both definitions could be considered ambiguous as they do not mention which specific type of data they pertain to, the updated terminology allows for more freedom in interpretation as it covers a wider set of data.

Under American law, the word *contents* (plural form) is defined as follows: “when used with respect to any wire, oral, or electronic communication, includes any information concerning the substance, purport, or meaning of that communication” (18 United States Code § 2510). *Non-content information* receives its name in

contrast with the concept of *contents of communication* and it includes data such as „name; address; local and long distance telephone connection records, or records of session times and durations; length of service (including start date) and types of service utilized; telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address; and means and source of payment for such service (including any credit card or bank account number)” (18 United States Code § 2703). We find it essential to highlight that, despite not being noted within the section from the *United States Code (2011)* we are mainly focusing on, *metadata* is also a term commonly used in American English, which has subsequently been adopted into the Romanian specialized terminology.

Semantically equivalent terms in Romanian

Romanian terminology related to the field of intelligence and lawful interception can be found within *Law no. 51/1991 on the National Security of Romania, republished, with subsequent amendments and completions* (The Parliament of Romania, 2014). Considering the various terminologies outlined previously, we will present semantic equivalents in Romanian. These include those located in the legal document mentioned above, as well as borrowed terms that have made their way into Romanian through various fields and later became part of the intelligence terminology. For instance, unlike English, which distinguishes clearly between the terms *court order* and *warrant*, in Romanian, the word *mandat* is utilized to convey both meanings. *Mandat* is a particular word associated with law enforcement, extending beyond the intelligence field, as a result of terminology standardization in the national defense sector. We were unable to find a direct equivalent for *mass surveillance* and *bulk interception* in the Romanian law, but the concept is clearly reflected in the language utilized by the media, specifically through the phrases *interceptare în masă* (mass interception) and *supraveghere în masă* (mass surveillance). From a linguistic perspective, they could be phraseological calques from French *interception en masse* and *surveillance de masse*, which appear to have served as models for the American English equivalent as well. In regard to the terminology utilized to refer to the object of the interception, the Romanian language employs a straightforward noun phrase, *comunicații electronice* (electronic communications), to encapsulate all of the types of communication. A similar tendency

for linguistic economy is noticeable in British English, whereas American English adopts a wider definition, in order to meet the need for accuracy within legal language.

To name the company that provides telecommunications services, in Romanian, as well as in British English, the term *operator* is preferred. In this case, we can also observe the terminological standardization between the three linguistic varieties where the term (*tele*)*communications* is used between all three of them, given the fact that it appeared as part of the industrial innovation process that led to the adoption of loanwords and calques. Last but not least, the term for details related to communications not associated to the content of the communications themselves is found, within *Law no. 51/1991* (The Parliament of Romania, 2014), in the form of a phrase: “date generate sau prelucrate de către furnizorii de rețele publice altele decât conținutul acestora” (in English, data generated or processed by public network providers other than its content). We believe that this framework is no longer relevant and fails to adhere to the principle of linguistic economy and efficiency. At the time the law was enacted,

the terminology related to intelligence had yet to undergo the international standardization that has since occurred. Currently, the term *metadate* is increasingly utilized in Romanian to convey the concept mentioned earlier, likely borrowed from the terminology in the field of Information and Communication Technology.

Conclusion

Contrary to the tendency that might lead one to assume that intelligence terminology in British English and American English are almost identical, there are nevertheless key concepts within the two varieties of English which, although denoting identical or similar concepts, use different lexical units in order to express them. We can also observe the influence that intelligence terminology from other communities had on Romanian terminology, where, even in cases where concepts are defined within the legal framework, there is a tendency to move towards linguistic economy through innovative loanwords.

U.S. Terminology	U.K. Terminology	Romanian Terminology
<i>court order</i>	<i>warrant</i>	<i>mandat</i>
<i>mass surveillance</i>	<i>bulk interception</i>	<i>interceptare în masă</i>
<i>wire, oral, electronic communications</i>	<i>telecommunications</i>	<i>comunicații electronice</i>
<i>communication common carrier</i>	<i>telecommunications operator</i>	<i>operator de telecomunicații</i>
<i>non-content information</i>	<i>secondary data</i>	<i>date generate sau prelucrate de către furnizorii de rețele publice altele decât conținutul acestora / metadate</i>

Table 1. Semantically equivalent terms in American English, British English, and Romanian Intelligence Terminology

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