Forum

Manuscript Terminology: a Plurilingual Perspective

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Manuscript terminology¹ – or codicological terminology, given that palaeographical vocabulary is still a taboo – has been a debated issue since 1953, when the idea of a multilingual glossary was conceived by Charles Samaran, the doyen of Latin palaeographers. The project did not become reality for quite some time, and then only in the family of Latinbased languages.²

The range of available dictionaries and other terminological tools is still rather unsatisfactory in English and German and in the other European languages. There are, however, exceptions in the form of a number of contributions focusing on individual aspects, mainly bookbinding and decoration,³ a mass of largely unreliable glossaries that are often no more than simple lists of terms,⁴ and one promising English project being developed by Peter Gumbert, but this is still far from complete.⁵ If we turn to the various manuscript cultures that developed round the Mediterranean basin, the outlook – with the partial exception of the Arabic sphere⁶ – is even more daunting: shortcomings in terminology are frequently joined by vague definitions of related concepts for which the need has not even been noticed.⁷

⁴ For a merely indicative selection of links see Maniaci 2008, 209–210 n. 84.

⁵ Gumbert 2010: thanks to the generosity of the author, I had the opportunity to preview and discuss with him the available chapters ('Scribes and their tools' and 'From sheet to page').

⁷ Comparative codicology has the daunting task of reducing the gap in the state of knowledge concerning the different book cultures: this is the main

Research has continued, however, and existing terminologies are therefore showing inevitable signs of age: new flaws and errors have joined earlier shortcomings affecting the choice and organization of terms and the wording of definitions.

With regard to historical terminology, the situation is even less encouraging: the surveys presented at a round table in Paris twenty years ago have not been followed up,⁸ and the only systematic initiative that has been carried on since then concerns the Byzantine book; this is still incomplete.⁹

There is a general consensus as to the usefulness of a common codicological terminology in the main European research languages, but its objectives and the means for implementing it are unclear. What are the reasons for this continuing stagnation, apart from the fact that Denis Muzerelle's authoritative *Vocabulaire codicologique* definitely helped to inhibit the development of alternative projects (with rare exceptions)? Are the ambitious agenda and underlying assumptions of the Comité de paléographie still to be considered valid? What are the needs that a technical vocabulary should fulfil? What kind of public should it address? In practical terms, what are the new tools to help them accomplish their task? These are the issues I address in the following pages.

1. Why and for whom?

The first question for any aspiring terminologist concerns the purpose of the work – in other words the needs of the public to whom it is addressed. Samaran's original project was rooted in a well-defined context in which the scientific study of the codex – as a material artefact and not just a container of texts and a vehicle of thought – was in its infancy and lakked a mature technical lexicon and reference works.¹⁰ This explains the importance attributed by Denis Muzerelle to the definition of a conceptual framework that would systematize an emerging discipline and to rigorous selection of the terms to be fit into it. The success of his *Vocabulaire* is largely

¹ This contribution is an expanded version of a paper presented at the 'Internationale Tagung der Handschriftenbearbeiter', held in Wolfenbüttel, Herzog August Bibliothek, on $19^{th}-21^{th}$ September, 2011.

² French: Muzerelle 1985; Italian: Maniaci 1996, 1998²; Spanish/Castillan: Ostos, Pardo, and Rodríguez 1997; Papahagi 2013. The Catalan version by Arnall i Juan 2002 is questionable under many regards (selection and ordering of terms, wording of the definitions); not by chance it has not received the patronage of the Comité International de Paléographie Latine.

³ I refer in particular to Gnirrep, Gumbert, and Szirmai 1992; Brown 1994; Jakobi-Mirwald 2008; for other references see Maniaci 2002, 2005², 191– 193. The work by Beal 2008 disappoints the expectations raised by its title; it is in fact an alphabetical list of terms, adopting a very wide definition of 'manuscript' and principally referring to the 16th and17th centuries. The recent repertory by Šedivý, Pátková 2008 is an interesting, but limited (and isolated) attempt to collect and define palaeographic terminology.

⁶ See Gacek 2001; 2008; 2009.

task of the ongoing project COMSt, Comparative Oriental Manuscript Studies (http://www1.uni-hamburg.de/COMST/).

⁸ See Weijers 1989.

⁹ Cf. Atsalos 1971 [2012]; 1971 and 1972; 1977; 2000.

¹⁰ Ruiz García 1988 and 2002; Lemaire 1989.

attributable to these basic choices. In the absence of more specific instruments it has also been used as a handbook of codicology, even though the author intended to limit his definitions to the bare minimum of terminological information and resisted the temptation to adopt a more encyclopaedic approach.¹¹

The considerable increase in the number of reference works in recent decades¹² has led to a decline in the inappropriate use of existing vocabularies for teaching purposes; in the meantime new and pressing needs for the standardization of terminology have emerged as a result of the spread of new technologies and the internet. This significant change has not yet brought about a deliberate redefinition of the original project: codicological terminology is still loaded with old and new expectations and responsibilities, and these have not yet been arranged in a clear setting. The main requirements may be summarised as follows:

Communicate with the greatest possible precision the body of technical knowledge relating to the manuscript book with a view to reducing ambiguity. Peter Gumbert recently reformulated this general objective effectively: '... as long as we have not embedded the facts in a structure of words, they are not yet sufficiently clear to ourselves, and it will be difficult to observe them, or to communicate our observations to others.'¹³

Represent the state of knowledge at a given time: the clarity and depth of knowledge will require precision and richness in the terminology used to express it. One example may suffice: a central concept for the study of the genesis and evolution of the codex – the 'codicological unit' – has been proved inadequate by recent research and, given the number and variety of structural 'units' that can be isolated in most Medieval codices, as a consequence a nebula of additional or alternative terms and concepts has emerged. These include 'booklet', 'élément codicologique', 'modular unit', 'production unit' and 'circulation unit', but their mutual relationships have not yet been defined – as shown, unsurprisingly, Two other requirements have emerged more recently that are less clearly defined and apparently very different from each other:

Manage the body of existing knowledge, with particular regard to the growing mass of unordered information available in digital formats. An increasingly urgent demand for glossaries of basic terms, possibly with multilingual equivalents, has recently emerged to meet the need for universal organisation and access to content on the internet. With regard to the Western and Byzantine medieval book, it is generally believed that this need is largely met by the online version of the Vocabulaire codicologique, also managed by Muzerelle.¹⁵ Few people seem to be aware that this is actually a one-way database founded on the original French text: it gives Italian and Spanish equivalents, occasionally adding a proposed English term, and it does not take into account developments in the versions based on the French prototype, such as the introduction of new terms, the deletion of obsolete ones, the introduction of corrected or modified definitions, or the sometimes imperfect correspondence of meanings among the different idioms.

Produce new knowledge through detailed mapping of the various aspects of the study of book materials and techniques, with a focus on poorly defined issues and concepts and, if necessary, the invention of new terms to designate them, organised into coherent systems. This less urgently perceived requirement stems from the progress made in codicological research in recent decades, particularly in fields such as the study of paper and watermarks, 'complex' codices, rulings and layouts. I have recently proposed an example of this new approach, which is not represented in the *Vocabulaire codicologique* and other glossaries based on its structure; I shall return to this shortly.¹⁶

It would be misleading to view electronic management of codicological knowledge and the production of new research as opposing practical and scientific needs. In fact the creation of a glossary of key terms such as those most frequently used in manuscript catalogues can only occur as the result

¹¹ Muzerelle 1985, 8: 'La notice explicative consacrée à chaque mot ou expression devait, selon la comparaison dont il usait lui-même [i.e. Charles Samaran], demeurer aussi concise, objective et rigoreuse, qu'une définition du Petit Larousse. Et c'est à quoi nous avons tâché en nous défendant toujours expressément d'introduire tout développement ou considération de type historique, géographique ou typologique. Les explications techniques, elles-mêmes, ont été restreints à ce qui était strictement nécessaire pour l'intelligence du terme en question'.

¹² See the very close publication dates of the following recent introductions to codicology: Maniaci 2002, 2005²; Agati 2003 and 2009; Géhin 2005.

¹³ Gumbert 2010, Preface.

by the vague and inaccurate definitions proposed for most of these terms.¹⁴

¹⁴ The point on this topic, with a detailed discussion of the single terms, is made by Andrist, Canart and Maniaci 2013; see also Andrist, Canart, and Maniaci 2010 (where the Medieval codex is compared to a LEGO game, each brick representing a stage of its construction or further transformation) and Gumbert 2004 (with a temptative English terminology for the 'stratigraphy' of the codex).

¹⁵ http://vocabulaire.irht.cnrs.fr/., now integrated into the application 'Codicologia', http://codicologia.irht.cnrs.it.

¹⁶ Maniaci 2008, 197–205.

of reflection on the conceptual and practical limitations of the vocabulary in use. This is also proved by the failure of a proposal made a few years ago at a London conference to address the creation of a basic English terminology in a pragmatic form using invented terms to fill the most glaring gaps.¹⁷

2. How to proceed?

Once the objectives and beneficiaries of the terminologist's activities have been defined, he or she still has to make some delicate choices such as the delimitation of the field of interest, the methods of survey and selection from the existing lexicon, the possible creation of new terms, the criteria for sorting entries, and the wording of definitions. Because most of these subjects have already been treated by all the authors of codicological terminologies, including myself, I will merely summarize the main issues, with some additional considerations:

Defining the field

Although many, if not most, collections of technical terms are inspired by the immediate needs of personal research, every systematization of technical terminology should be based on a census of the vocabulary in use. This is achieved by analysis of existing publications; in some sectors nowadays it can be done with special software. In any case, the field to be covered must first be defined. I have recently shown that the attempt to identify objective criteria for a codicological lexicon must inevitably admit the existence of a 'zone of discretion', the size of which will depend on the topics.¹⁸ Even though an excess of enthusiasm led me about 15 years ago to comprise in my vocabulary a number of marginally relevant terms - which attracted some criticism - I remain convinced that a reasonably inclusive attitude is preferable to a rigidly restrictive one. The decision to include the names of the most common pests affecting wood and paper, which are distantly related to the book, in a chapter on preservation and restoration seems to me less sinful than excluding, under some criterion of relevance, the rich vocabulary of the machinery and tools used in paper manufacturing, as if it were irrelevant to the codicological description of the paper itself.

Collecting and selecting terms

The selection of terms also involves a bit of healthy pragmatism. Only in artificial languages does each term correspond to a single abstract definition within a fixed hierarchy. In the case of manuscript terminology, examination of the sources produces a hybrid mix of technical and non-technical terms that are lexically and conceptually inconsistent even when they are not drawn from other languages: this occurs as a result of eclectic use of foreign words - notably terms imported into Italian from French such as lisière, mise en page or calque (favoured by historians of book decoration), and literal translations of terms from other languages.¹⁹ To address this varied lexical ensemble, terminological theory offers a choice of opposites: a descriptive or a normative approach. The descriptive approach considers technical terminology as a systematization that derives spontaneously from actual use of a special vocabulary in a given context - a view that promotes respect for the inconsistencies of a language by registering synonyms, homonyms and obsolete terms with a view to reflecting the natural tendency of the lexicon to variation and renewal. The normative approach, on the other hand, seeks to unify the established terminology artificially, a task proposed and supported in some sectors by national and international agencies and associations. In the case of book terminology, which has remained on the margins of the debate that has developed around other scientific languages,²⁰ it seems to me that such rigid contradistinction should be mitigated by adopting a more flexible attitude than the strictly descriptive stance of the Vocabulaire and its Italian and Spanish homologues. In fact the artificial regularization of a living lexicon consisting of contributions from various origins does not suit a small specialist community such as codicologists, who work in various local scientific traditions and are not particularly open to experimentation, and who are inclined to employ a variety of expressive usages. Yet it seems to me that the current context, which is characterized by rapid globalization and dominated by new and increasingly urgent requirements for information retrieval, justifies a more proactive attitude, at least in relation to the basic terminology normally used in cataloguing descriptions.²¹ The aim of describing what is observed as objectively and uniformly as possible is to facilitate the retrieval of information in a given category and to aid comparisons, respect for tradition

¹⁷ An English Codicological Vocabulary (an English Language Version of the Vocabulaire codicologique), London, 8–10 July, 2004 (the programme may still be consulted at http://ies.sas.ac.uk/cmps/events/ conferences/2003-2004/Vocab/index.htm).

¹⁸ Without necessarily sharing the extreme position of Biel 2008, VIII: 'the main principle of selection operating here was my own interests and knowledge'.

¹⁹ For the 'physiognomy' of Italian terminology (with observations which can be extended to other languages) see Maniaci 2008, 5–7. Interesting remarks on the criteria underlying the construction of the German vocabulary of book decoration have been formulated by Jakobi-Mirwald 2011, an unpublished speech delivered at the conference cited above, fn. 1.

²⁰ I refrain from giving an – even partial – account of the bibliography concerning non-codicological terminology, which is too rich and diverse, as well as very far from my specific skills.

²¹ My opinion differs under this respect from that expressed by Jakobi-Mirwald 2011.

and defence of linguistic diversity but often has the single effect of generating ambiguity and confusion instead. Consider, for instance, the Italian use of synonyms for 'leaf' such as *foglio* or *carta*, both of which are lexically ambiguous, or the logical sequence *binione* – *ternione* – *quaternione* – *quinterno* – *quaternione* – *quinterno* – *quaternione* – *quiterno* – *quaterno* – *quinterno*. In these and other cases it seems to me that the achievement of lexical uniformity is worth attempting, though in some fields – the best example is decoration – the task may at first seem impossible. I remain convinced that no revision or rationalization of the lexicon can be successful unless it is associated with an equally determined effort to harmonize cataloguing protocols, abandoning the unconditional defence of their exceptional variety, in the name of the uniqueness of the manuscript book.²²

Linguistic invention

The idea that the current codicological lexicon can be modified implies correcting inconsistencies and filling gaps, both of which are delicate and risky tasks that entail different levels of intervention. The first and more conservative operation involves adapting or 'creatively' manipulating existing terms, as cautiously admitted by Muzerelle and more recently Gumbert,²³ with a view to constructing complete and logically consistent terminological sets: in the French sequence bifeuillet extérieur - bifeuillet médian or centrale, for example, the expression bifeuillet intermédiaire can logically be inserted, though it is not documented in any sources.²⁴ But genuine linguistic invention is a different and more daring matter in that it is intended to fill particular gaps or - more ambitiously - to enrich and organize existing conceptual and terminological sequences by introducing new concepts and proposing new terms to define them. I recently tried to apply this conceptual rather than terminological approach to the description of the quire: in doing so I highlighted the incompleteness and inconsistency of the available family of Italian terms, but the situation is the same in other languages. The example of vocabulary concerning the structure of the quire is particularly telling because almost all the terms needed to describe the relative position of each leaf and page in the bifolium and the quire are lacking. To compensate, I had to invent forms of expression such as: i) bifoglio naturale

('natural bifolium') and bifoglio artificiale ('artificial bifo*lium*') to designate a *bifolium* obtained by folding a single surface and one obtained by joining two separate surfaces; ii) fogli solidali ('joint leaves' of natural bifolia) and fogli coniugati ('conjoined leaves' of artificial bifolia); iii) pagine solidali ('joint pages') and pagine coniugate ('conjoined pages') belonging to the same face of a natural or artificial bifolium; iv) foglio anteriore ('front sheet') and foglio posteriore ('back sheet') for the first and second of the opposing surfaces of a *bifolium* in the direction of reading; and v) *fogli* ante-cucitura ('pre-seam leaves') and fogli post-cucitura ('post-seam leaves') to designate leaves belonging to the first or second half of a quire.²⁵ Systematic dismantling of the concepts associated with the term 'quire' rapidly produces a hypothetical sequence of terms and definitions that is significantly richer than those in the glossaries published to date.²⁶ In this case the terminology is clearly not meant to impose premature use of an artificial lexicon: it is intended to stimulate enrichment through logical organization. The risk of error must not be underrated. In 1996, influenced by research I was conducting with Frank Bischoff, I coined and included in my glossary the expression in quarto longitudinale ('as a longitudinal quarto') referring to a hypothetical mode of subdividing parchment sheets, but (after more than 15 years) its application has not yet been validated by archaeological evidence.27

Organization of terms

Specialist terminologies, which are logically structured collections of concepts, tend to be presented in thematic order rather than the strictly alphabetical order typical of general vocabularies. As we know, the glossaries inspired by Muzerelle's *Vocabulaire* all faithfully follow the structure of their prototype with a view to harmonizing different linguistic and conceptual systems. But this approach, which I have long supported, involves the risk of forcing research into a system that is too rigid and inevitably outdated. The emergence of alternative systems such as that proposed by Peter Gumbert therefore appears to be justified, though the prospect of alignment between different languages may be further complicated in the future.

Definitions

The problems of constructing definitions, which I tried to summarise earlier, are as numerous and delicate as those of

²² Another source of recurring ambiguity is the confusion between an instance of alignment and rationalization of the terminology used in different languages and the need for its strict lexical normalization, which is essential to allow automatic searches in catalogues and collections of images: in this second perspective, the choice between semantically equivalent alternatives such as, in Italian, *'specchio di scrittura'* and *'specchio scrittorio'* becomes unavoidable.

²³ Muzerelle 1985, 12; Gumbert 2010, Preface.

²⁴ Muzerelle 1985, 96 (313.16, 313.17, 313.18).

²⁵ The definitions are given in Maniaci 2008, 199–200.

²⁶ Other examples of this same approach have already been given: for mediaeval paper, see Ornato, Munafò, and Storace 1995, 4–12 (and also Ornato 1995, 1–3); for the layout of texts accompanied by commentaries see Sautel 1999, 17–31.

²⁷ Bischoff, and Maniaci 1996, 305 ff.; Maniaci 2008, 127.

selecting and organizing terms.²⁸ Again, I will draw attention to two points.²⁹ The first concerns the choice between a purely terminological perspective, which limits the wording to elements that are strictly essential to the definition of the item, with reference where necessary to terms defined elsewhere, and an encyclopaedic approach, which tends to incorporate inessential information in order to clarify the properties or usage of a given term or to outline the essential knowledge concerning it. An example is the (perfectible) terminological definition of *bifolium* in the *Vocabulaire codicologique*:

Bifeuillet (bf.) Bifolio (-lium) Diplôme *Feuillet double *Double feuille Pièce rectangulaire de parchemin, papier..., pliée en son milieu pour former deux feuillets.³⁰

This is to be compared with the encyclopaedic definition more recently proposed by Gumbert:

bifolium

a sheet ((b) or (c)), folded in the middle so as to form two leaves.

The two leaves are conjoint or conjugate leaves (each being the conjoint or conjugate leaf of the other); they are respectively the anterior and the posterior leaf. A convenient way of mentioning e.g. 'ff. 26 and 29, that are

conjoint' is to print 'ff. 26^29'.³¹

Apart from the fact that both definitions ignore the existence of artificial bifolia as defined above, they seem to me equally eligible provided they are clearly distinguished and systematically applied.

The second point concerns the difficulty of conceiving perfectly accurate definitions, even – or perhaps especially – for apparently simple notions such as 'book', which has been the subject of several more or less convincing attempts. Compare, for example, the version offered by Muzerelle's *Vocabulaire*:

Livre

Assemblage portatif d'éléments présentant une surface plane, sur lesquels un texte peut être écrit de façon durable.³²

³¹ Gumbert 2010.

32 Muzerelle 1985, 57 taken exactly in the Italian and Castilian versions.

and a more recent proposal by myself and two colleagues, arrived at after several tentative versions:

Livre

Objet transportable destiné à accueillir, partager et transmettre des contenus immédiatement lisibles de façon ordonnée et durable.³³

The apparently minor innovations of the second definition consist of: i) explicit mention of the fundamental aim of the book – to host, share and transmit content – which does not necessarily imply a text; ii) the requirement that the content be ordered, which makes the definition inapplicable to loose leaves and drafts in which the sequence of leaves can be freely altered after writing; and iii) replacement of the adjective 'portable' with 'transportable' in order to include the possibility of moving very large and heavy books that were meant to be read or consulted *in situ*.

3. Towards a plurilingual lexicon

At this point the notion of a multilingual terminology, suggested long ago by the Comité de paléographie but soon dismissed as premature, deserves separate discussion. Christine Jakobi has recently dealt with this issue³⁴ and in general I share her observations, particularly the assumption that the translation of a whole terminology – or its harmonization with that of another language – is for various reasons of language and content an impossible and ultimately unnecessary task. I think, however, that it is feasible and desirable to build a glossary of key terms, with parallels in several languages, even if Jakobi's courageous but problematic attempt on the vocabulary of book decoration convinces me that it would be best to postpone the enterprise pending fuller reflection on each individual language.

4. A possible new horizon?

Is it better to circumscribe rigidly the boundaries of a technical language, or to trespass into more or less closely related sectors? Is it better to reflect the variety of the existing lexicon, or to run the risk of normalizing it? Is it preferable simply to record gaps and inconsistencies, or to use some creativity to correct and supplement terminology established over time? Is it preferable to limit definitions to essentials, or to enrich them with detail? Is it better to preserve the specificity of individual languages, or to force them into a common system, reducing variety in order to promote common usage? These questions highlight the limitations of the traditional

²⁸ See Maniaci 2007, 1–15.

²⁹ Other paradigmatic examples have been proposed by Jakobi-Mirwald 2011.

³⁰ Muzerelle 1985, 91 (311.03): the Italian definition (Maniaci, 1996, 1982, 125) opens with the specification 'unità costitutiva del fascicolo', which now appears to me inappropriate.

³³ Andrist, Canart, and Maniaci 2013.

³⁴ Jakobi-Mirwald 2009, 1-8.

form of the printed glossary. As I have argued elsewhere in detail, a solution to this impasse might emerge from the construction of a new digital resource that combines different perspectives, needs and uses.

I am not referring to the straightforward transposition of paper dictionaries into electronic format, following the *Vocabulaire* online, but to the construction of a knowledge management system designed to overcome the rigid conception of book terminology based on abstract and binding criteria of uniqueness, consistency and stability.

The switch from a terminological approach to an integrated knowledge database would make it possible to combine different levels of content:

- terminology, returned to its specific function of producing concise and accurate definitions purged of extraneous or redundant content;
- an encyclopaedic dictionary intended to extend, contextualize and update the basic information provided by the definitions; this aspect is crucial to encourage the development of terms not currently available in one or more languages;
- historical lexicography aiming to collect and organize ancient, medieval and recent terminology that has been superseded by modern research;
- a reference bibliography, enabling the researcher to refer to sources attesting the use of each term, which may include quotations to give the context in which it appears and references to external sources such as the digital libraries that are more and more widely available online;
- iconographic documentation, intended to integrate verbal definitions rather than replace them; and
- new research, which would lead to the creation of new and innovative terminological proposals.

The 'encyclopaedic dictionary of manuscript terminologies' I have in mind would be fully multilingual, with each language – and not only Western languages – treated as an autonomous system and connected to the other languages through the use of symbols graduated according to the nature and limits of the suggested parallels.

The advantages of this approach may be summarized by the word 'flexibility':

 Flexibility means conceiving terminological activity as a work in progress with a view to revising, correcting and updating the available vocabulary. The changes could be documented in notes to clarify the way they reflect the evolution of knowledge or the ongoing debate among scholars.

- Flexibility implies the possibility of accessing information by various means without being bound by a single system. The database allows for the coexistence of a logical classification appropriate site maps would have to be constructed with an alphabetical classification that would make it possible, among other things, to extract and display thematic glossaries with equivalents in different languages, and with a multidirectional and hypertextual classification that enables navigation through terminological entries containing hyperlinks, images and quotations.
- Flexibility implies the rejection of a rigid approach to the selection of terms and to the wording of definitions. Several different definitions may be included for concepts whose interpretation is still controversial or not yet fully elucidated.
- Flexibility entails a certain freedom in the demarcation of disciplines and the possibility of incorporating terms from related disciplines and of linkages to external resources.
- Lastly, flexibility means that new graphic, iconographic and textual materials can be integrated as they become available on the internet.

In concluding this paper I cannot conceal a vague sense of unease. Having attempted - with the recklessness of youth to produce codicological terminology, I have also helped to increase the speculation that has hampered the long-standing project of a multilingual lexicon. As happens in other fields³⁵, there is a risk that theorizing works as an alibi to obscure tardiness in achieving results. Although I am convinced that international scientific cooperation is the only way to ensure the survival of manuscript research, enterprises such as the Catalogues des Manuscrits Datés clearly illustrate the difficulties of multinational institutional cooperation in the absence of a supranational documentation and research entity that has the authority to impose common standards and operational criteria and support them with financial and logistical inputs. For the same reasons, the electronic manuscript terminology may be in danger of being no more than a pleasant utopian dream.

³⁵ I refer for instance, as regards Italy, to the field of manuscript cataloguing, where – with rare but worthy exceptions – the theoretical debate developed in recent years has been more intense and lively than the projects sponsored by universities and other public institutions (see for instance Palma 2003, 333–351).

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