

# Cyber Sovereignty: How China is Changing the Rules of Internet Freedom

Rachel A. Hulvey

## Abstract

China is definitively not a status quo power in cyberspace. Less understood is how China is attempting to create change in the international order and which countries are responding to China's appeals for reform. Drawing from studies of social movements, I develop an original theory explaining a rising power's ability to attract support in the face of competition from the dominant power through framing the need for change. China's strategy frames changes in Internet governance as improving a widely cherished value: the right to sovereignty. I conduct two tests of the efficacy of China's cyber sovereignty frames in competition with liberal frames deployed by the U.S. In the first test, a regression analysis of votes for changes in the International Telecommunication Union (ITU) reveals that China's frames mobilized statist countries and the G77. In the second test, I break down the vote for the renegotiated treaty and votes from specific debates to find that sovereignty frames attract greater support than an emphasis on liberalism—especially from “independent” countries that provide China with the winning coalition. I use original data from the archives of the ITU to demonstrate how the mechanism of framing operates by focusing attention on sovereignty and government rights. Content analysis reveals that China's position was ultimately taken up and championed by the African Group. The results hold implications for understanding the attractive force of sovereignty to mobilize coalitions to re-write the rules of the game from within.

**Keywords:** Internet, self-governance, cyberborders, state sovereignty, digital age

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## Introduction

As China rises, China is determined to become a cyber superpower. Scholars have long debated whether China has status quo intentions<sup>1</sup>, but in cyberspace it is widely recognized that China desires to challenge and shift the existing liberal information order.<sup>2</sup> Like any other rising power determined to gain international prestige, China seeks to influence the international order and the way that countries collaborate.<sup>3</sup> Within Internet governance, China desires to shift a decentralized and highly commercialized status quo towards a highly centralized system of governance privileging the role of governments.

China increasingly uses social strategies to attract support for new rules of the game emphasizing the primacy of governments. These strategies involve a more subtle component of hegemonic power operating at the level of substantive beliefs rather than material payoffs alone to encourage governments to adopt an alternative system of governance focused on the power and authority of governments.<sup>4</sup> Understanding which states respond to China's attempts to socialize governments to new modes of collaboration, however, is complicated as the United States fiercely resists any changes in the status quo and challenges China's narrative through framing strategies of its own, focusing attention on the need to preserve an open and liberal Internet for commerce to thrive. Strategies of hegemonic socialization have yet to account for competitive social environments where the norms of the hegemon and rising power clash. When a rising power's proposals for changes in the status quo compete with existing ideas, which side attracts greater support?

Most scholarly research on China's rise has focused on China's motivations<sup>5</sup> with respect to the existing liberal international order and China's desire to change or to accept the status quo—as such, it has ignored or obscured which countries would support, or have supported, China's vision of international order. Some consider the possibilities for China to shift the foundations of the liberal order by analyzing global support for liberalism.<sup>6</sup> Most, however, have yet to take China's ideology as a starting point and map its attraction *relative to liberalism*. I build on studies mapping China's followers in the areas of trade and finance to focus on the attractiveness of

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1 Johnston (2003); Mearsheimer (2001); Nathan (2015).

2 Weiss and Wallace (2021); Segal (2017); Johnston (2019a).

3 Gilpin (1981).

4 Ikenberry and Kupchan (1990).

5 Kastner et al. (2016); Johnston (2003); Johnston (2019a); Weiss and Wallace (2021).

6 Allan et al. (2018)

China's vision of order as an alternative to liberalism.<sup>7</sup> As China seeks to establish new rules of the game emphasizing the primacy of states, would some countries join the Beijing-led vision of international order over the status quo liberal order and, if so, which?

Drawing from theories of social movements and framing, I argue that China's efforts to frame the need for change explain how officials mobilize in response to China's proposals. China's attempts to attract support for a fundamental reorganization of governance through the strategy of framing have been widely considered across political campaigns, elections, and social movements, but yet to be examined as a tactic of the powerful. Through investments in "discourse power" (*huayu quan*), the CCP directly acknowledges that the competition to set the rules in cyberspace is a competition of ideas. China's framing focuses the debates in Internet governance on a largely uncontested value: the sovereignty of nation states. China's framing focuses the debates in Internet governance on a largely uncontested value: the sovereignty of nation states. Frames focusing on the need for change to strengthen state sovereignty connects with earlier concepts that enjoy wider support within international organizations than liberalism,<sup>8</sup> providing China with a more attractive position than the U.S. in the competition to mobilize votes.

To test whether the theoretical expectations about the attractive force of sovereignty frames, I specifically analyze how the clash between China and the U.S. frames impacts which states mobilize within international organizations on important votes for shifting the status quo. I analyze the social competition between the United States and China during a renegotiation intended to modernize a technical instrument, the International Telecommunications Regulations (ITRs). During the World Conference on International Telecommunications in 2012 (WCIT-12), China encouraged governments to support a greater role for the ITU, whereas the United States strictly opposed any intergovernmental organization gaining a role in Internet governance. Through a logistic regression of voting for shifts in the status quo, I assess which governments support China's calls to shift Internet governance away from multistakeholder organizations. The results demonstrate that after China and the U.S. both interpreted the vote for a technical treaty through an ideological lens, mobilizing in support of the renegotiated ITRs became wrapped up in views about the appropriate role of the state, with those holding strong preferences for government direction mobilizing in support of changes. I also demonstrate that sovereignty frames are highly compelling to coalitions of developing countries, particularly the G77, or Group of 77.

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7 Liao and McDowell (2016); Broz et al. (2020).

8 Simmons and Goemans (2021).

In the second test of my theory of framing, I analyze the attractive force of China's sovereignty frames relative to the U.S. liberal frames. I analyze two instances of competitive frames through the debate on the treaty preamble and a debate on the role of the ITU in Internet governance relative to multistakeholder institutions. Using original documents from the archives of the ITU, I trace how governments respond to China's emphasis framing on government rights and the need to strengthen sovereignty. By appealing to governments through the lens of preserving and protecting sovereignty, China's frames compelled greater support than liberal frames focused on human rights, the benefits of free markets, and individual freedoms online. By breaking down the vote into smaller coalitions, I demonstrate that China ultimately attracted greater support than the U.S. because China's sovereignty frames appealed to states in the middle of the ideological spectrum, in addition to statist countries, whereas the U.S. only attracted a smaller coalition of liberal countries. "Independent states" provided China with the winning coalition as more countries mobilized in support of China's proposals than the U.S. The results suggest that China's message crosses the ideological divide to more widely mobilize countries in support of change.

The findings of China's efforts to change the status quo provide one of the first tests of competition between ideologies and how framing impacts mobilization for changes in support of an alternative ideology. Liberalism receives the lion's share of attention across international relations research, with scholars frequently examining the vitality of liberal principles without yet dedicating similar analytical attention to competing ideologies. With China's rise comes the advancement of a statist ideology on the world stage. I contribute understanding of the attractive force of statist ideology relative to liberalism through an analysis of framing the need for change around a major global ideology. The results speak to the attractive force of China's sovereignty frames relative to those developed from liberalism that challenge an interdisciplinary literature expecting a status quo bias<sup>9</sup> favoring the United States, the literature on soft power that expects China to be challenged when competing against the broadcultural appeal of liberalism,<sup>10</sup> scholars that expect China's ideas to be too particularistic to diffuse<sup>11</sup>, and work that argues for the vitality and strength of liberal ideas globally.<sup>12</sup> My analysis demonstrates the surprising influence of China's sovereignty

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9 Eidelman and Crandall (2012); Kahneman et al. (1991).

10 Nye (2000); Nye (2011).

11 Greitens (2020).

12 Allan et al. (2018).

# 1. China's Motivations and Means for Ideological Change

During power transitions, rising powers are expected to contest aspects of international order beyond mere shifts in the distribution of power. Laying down universal norms, institutions, and mechanisms for operating across national boundaries helps a rising power align international standards with domestic preferences.<sup>13</sup> Gilpin argues that it is natural to anticipate ideological change during power shifts. For instance, “Rome and Britain each created a world order, but the oppressive rule of the Pax Romana was in most respects very different from the generally liberal rule of Pax Britannica.”<sup>14</sup> I consider China's motivations and means to shape the ideology of the international information order.

## Motivations for Ideological Change

The international information order operates as a decentralized and highly commercialized order.<sup>15</sup> The United States was instrumental in shaping institutions<sup>16</sup> to operate as private or multi-stakeholder institutions heavily involving civil society alongside governments.<sup>17</sup> Multistakeholder institutions in Internet governance sometimes privilege the voices of private actors and civil society over governments, given technical expertise.

The United States intentionally elevated the role of civil society in Internet governance to extend the reach of liberalism online. By establishing the Internet Corporation for Assigned Names and Numbers (ICANN)—the organization that distributes domain names for websites—to operate as a private organization the United States rejected the involvement of intergovernmental organizations.<sup>18</sup> For many years, ICANN operated through a contract with the U.S. Department of Commerce until the Obama administration privatized the organization. Although states have found methods for censorship to occur within national boundaries, the United States argued private control over domain name allocation and the root file of websites prevents governments from circumventing global Internet access since non-state actors have an economic interest in preserving connectivity. The anxiety over the involvement of governments in

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13 Cox (1987), 172.

14 Gilpin (1981), 37.

15 Simmons (2011).

16 Drezner (2004).

17 Farrell and Newman ; Raymond and DeNardis (2015), 573.

18 Drezner (2004), 495.

international decision-making about the Internet is reflected in the institutional design of ICANN, as states are relegated to a Governmental Advisory Committee that makes recommendations to the ICANN board. United States' decisions to place power in the hands of private and multistakeholder organizations underscores the important role of non-state actors in the liberal vision of preserving open access to the Internet.<sup>19</sup>

At times the United States' vision led to an extreme form of decentralization where private actors largely shape global governance without much state involvement. American internet giants control global social media platforms where the world's communication is increasingly concentrated. Sometimes referred to as the "new governors," American technology firms uniquely regulate and govern the types of permissible behavior on social media.<sup>20</sup> Decisions about how to evolve core Internet Protocols are made by epistemic communities such as the Internet Engineering Task Force (IETF), World Wide Web Consortium (W3C), and Institute of Electrical and Electronics Engineers (IEEE), that operate through highly informal procedures outside of the halls of traditional intergovernmental organizations where states and voting have no authority. For instance, a network of engineers known as the IETF makes decisions by "rough consensus and running code."<sup>21</sup> As the Internet is harnessed for a variety of purposes—ranging from trade to terrorism—non-state actors increasingly determine which behavior is appropriate, thus establishing the global standards for how the world interacts online.

The Chinese Communist Party (CCP) is determined to reshape the liberal international information order to support an alternative statist ideology elevating the role of the government to manage domestic stability in the face of uncertainties and threats associated with the Internet.<sup>22</sup> Statism "emphasizes self-determination as ethically good, reserves a prominent role for the state in domestic political economy, favors redistributing resources away from the West, and advocates for the restoration of non-interference in the domestic affairs of states."<sup>23</sup> Statism is motivated by a set of collective ideas undergirded by the principles of sovereignty and non-interference.<sup>24</sup> Since a statist ideology privileges principles of sovereignty and noninterference, many existing liberal institutions sit uncomfortably with these values. China perceives institutions like the International Criminal Court and Responsibility to Protect (R2P) as antithetical to national sovereignty given the way these institutions encroach on

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19 Raustiala (2016); Galloway and Baogang (2014).

20 Klonick (2017).

21 Nye (2011), 5.

22 Johnston (2019b).

23 Voeten (2021), 24.

24 Ibid.

internal affairs. The values of R2P are non-aligned with a statist philosophy permitting intervention.<sup>25</sup> President Xi Jinping summarized China’s vision of reforming institutions to operate according to a statist vision means the “sovereignty and territorial integrity of all countries are inviolable and their internal affairs are not subjected to interference.” The statist approach to internet governance grants the state outsized—i.e. not complete—decision-making power over Internet policies.

The CCP advances shifts in the liberal status quo of the information order towards a statist ideology to better protect domestic security from the threats associated with large civil society involvement in international governance. The CCP contests the highly commercialized nature of the existing order, given the nationality of dominant technology firms and civil society organizations. The CCP argues against the widespread inclusion of civil society in international affairs as China has long viewed transnational non-governmental organizations (NGOs) and activists with suspicion, fearing that they might challenge the CCP’s domestic rule.<sup>26</sup> The use of Twitter and Facebook to organize revolutions during the Arab Spring heightened the perception that Western firms and non-state actors are associated with efforts to overthrow authoritarian regimes and pose untenable risks to domestic stability. United States’ efforts to fund Virtual Private Networks for protesters to evade censorship heightens the CCP’s suspicion that Western civil society does little to assist with regime stability and may even be working to oppose the longevity of any non-democratic regime through digital mediums.<sup>27</sup> The heavy involvement of engineers, American technology firms, and NGOs is seen as working against the national interests of governments not aligned with the United States. As such, the CCP opposes the widespread inclusion of civil society in Internet governance and instead argues for cooperation exclusively within intergovernmental forums that are the domain of governments.

The CCP argues for shifts from the liberal decentralized and private institutions to defend against the asymmetric influence the United States gains over networks from the private design of institutions.<sup>28</sup> Reform of the liberal order brings security benefits, as the CCP often repeats the mantra that “without cyber-security there is no national security.”<sup>29</sup> The CCP has long perceived ICANN as an extension of the U.S. government.<sup>30</sup> China argues security threats are bound to continue as the

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25 Voeten (2021); Fung (2020).

26 Weiss and Wallace (2021).

27 Cuihong (2018), 658.

28 Farrell and Newman (2019).

29 Xi Jinping’s April 20 Speech at the National Cybersecurity and Informatization Work Conference, April 2018, see here.

30 Creemers (2020).



United States has outsized influence over core enterprises that operate the Internet and provide global connectivity.<sup>31</sup> Even after privatizing ICANN, many countries still fear institutions answer to the U.S. and could be weaponized by Washington to gain intelligence or limit connectivity. To mitigate this potential, China calls for a shift of Internet governance to the United Nations to gain greater multilateral control over the operation of the Internet and limit the asymmetric influence of the U.S.

Shaping order also impacts prosperity and prestige. As with any rising power bent on obtaining international prestige, the CCP pushes for reform that moves Chinese wisdom and ideas “towards the world’s center stage.”<sup>32</sup> China’s role as a great power is fulfilled by “China not simply adapting to, but instead more actively shaping, the world in which it is rising.”<sup>33</sup> The scope of the CCP’s vision under President Xi Jinping is broad. By promoting the centrality of China, scholars argue Xi seeks to pursue a “radically transformed international order” that grants China an international voice and influence proportionate to a vision of China as a central global power.<sup>34</sup> At the 27th study session of the Politburo, Xi directed officials towards “laying down rules for the international order” and using Chinese wisdom to decide “in which direction the world will head.”<sup>35</sup> The CCP sees cyberspace as central to the vision of achieving prestige through admonitions for China to become a cyber superpower. Codifying rules and principles allow a rising power to achieve “institutional binding”<sup>36</sup> where codifying preferences has the potential to lock in standards that are difficult to retract. Since cyberspace largely operates through a highly decentralized order, the CCP sees the opportunity to cement an alternative ideology so institutions governing the Internet support a different set of ideas and principles guided by Chinese wisdom.

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31 Segal (2017), 3; Galloway (2015); Lu (2016)

32 Doshi (2021).

33 Goldstein (2020), 178.

34 Economy (2022).

35 Boon (2018), 135.

36 Ikenberry (2011), 40-44.

## The Means of Ideological Change

As China is determined to re-write the rules of the game in cyberspace towards a statist ideology, Beijing seeks to shape international order by transforming institutions from within. Although many anticipate the possibility of dangerous clashes between the hegemon and rising power,<sup>37</sup> Goddard argues that in many instances rising powers seek to reform rather than overturn existing institutions.<sup>38</sup> A rising power, or any other actor bent on change, does not need to challenge the institution of multilateralism or create competitive institutions, but can use more insidious strategies to contest specific institutional forms of multilateralism. Multilateralism, by nature, is an exercise to organize global behavior around common principles of appropriate conduct.<sup>39</sup> The ideas that underpin multilateralism are not neutral. Ideologies offer prescriptions for whose ideas and interests should be supported within institutions.<sup>40</sup> Pathways for a rising power to rewrite the rules within existing institutions involve reshaping the rules and procedures to answer to an alternative ideology.<sup>41</sup> Multilateralism remains, but the ideas and institutions that support collaboration are fundamentally altered.

One approach to altering the ideology of existing institutions to support an alternative vision occurs through regime shifting. As a result of the influence of a rising power, new proposals within institutions put in place policies and practices that shift the status quo.<sup>42</sup> Under China's statist vision, China directs regime shifting in cyberspace from multistakeholder to multilateral institutions to incorporate a greater focus on governments relative to civil society and attenuate the influence of the United States in Internet governance. China argues for governments to shift from reliance on informal private institutions, such as ICANN, to centralize governance within the United Nations and International Telecommunications Union. Within the 2010 Internet White Paper, Beijing asserted that “the United Nations should be given full scope in international Internet administration” and at the United Nations Open-ended Working Group negotiations China welcomed, “establishing a permanent and sustainable international process within the framework of the UN to deal with the issue of cybersecurity.”<sup>43</sup>

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37 Gilpin (1981).

38 Goddard (2018).

39 Ruggie (1992).

40 Voeten (2021).

41 Morse and Keohane (2014).

42 Morse and Keohane (2014), 385.

43 China's Written Submission, United Nations OEWG, see here.

A statist ideology in cyberspace means that rather than allowing cybersecurity to operate at the margins of world affairs in decentralized modes of collaboration that allow non-state actors widespread latitude to shape technologies, governments should permanently centralize decision-making power with officials representing countries at the United Nations.

China also advances regime shifting by creating or revising treaties to privilege state interests and rights over individuals. China argues for the development of new treaties and rules for the Internet rather than continuing to rely on the application of existing rules and institutions. In addition, rather than exclusively emphasizing individual protections within international conventions, China argues the treaties crafted for the Internet should codify the right to sovereignty that elaborates and codifies the norm within new treaties for the Internet. Sovereignty includes elaborating several related rights for member states, such as the right to independence, or the right of nations to “independently choose network development paths, governance models, and public policies”;<sup>44</sup> the right to equality that “sovereign states have the right to participate equally in international governance in cyberspace and jointly formulate international rules”; and the right to jurisdiction that governments “possess legislative power to formulate laws governing people, facilities, and data and administrative power to control network facilities, information, and data located within territory.” Taken in sum, the elaboration of the right to sovereignty within rules and treaties shifts the relative focus of the United Nations and other international organizations towards prioritizing the rights of governments.

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44 Cyber Sovereignty Theory and Practice 2.0 网络主权：理论与实践 2.0 版 [ 2.0, see here].

## 2. The Competition to Socialize in Cyberspace

Changing the fabric of international organizations through regime shifting requires a rising power to build a coalition to support proposals for changes in the status quo. Many theories expect great powers have a role to play in the legitimacy of new methods of collaboration.<sup>45</sup> As Morse and Keohane mention, change requires a rising power to “mobilize support and attendant resources, and to gain legitimacy for their contestation of established multilateral policy.”<sup>46</sup> The growing material might of a rising power does not simply translate into commensurate authority over institutions as efforts to advance proposals are complicated by the need to maintain legitimacy in multilateralism itself. Stone underscores the need for great powers to maintain legitimacy when securing their interests. Since institutions rely on voluntary participation, great powers must carefully balance national priorities against the need to maintain support from other nations.<sup>47</sup> Ikenberry and Lim refer to a rising power's need to engage in institutional statecraft to attract support for change.

Under a social approach that attracts legitimacy for changes, a rising power is expected to gain support for alternative forms of collaboration through three distinct pathways. The first pathway, social influence, operates due to the fear of societal backlash for nonconformity.<sup>48</sup> Social capital and brokerage within the system provide the rising power with the authority to set the agenda and attract support for alternative rules of the game. Once a rising power accumulates such social authority, it can withhold status such as membership or recognition to shape behavior to align with the rising power's vision.<sup>49</sup> International organizations contain social environments that pressure newcomers to conform to dominant norms.<sup>50</sup> Some efforts may involve directly naming and shaming those that violate established cyber norms.<sup>51</sup> Although social pressure once influenced China<sup>52</sup>, deploying this type of influence within international organizations is complicated by the competing vision offered by the United States which limits the ability of international organizations to operate as fertile grounds for social pressure.

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45 Cox (1987); Ikenberry and Kupchan (1990); Schweller and Pu (2011); Finnemore (2009).

46 Morse and Keohane (2014), 388.

47 Stone (2011).

48 Finnemore and Sikkink (1998); Johnston (2014); Finnemore and Hollis (2016).

49 Hafner-Burton and Montgomery (2006).

50 Johnston (2001).

51 Finnemore and Hollis (2019).

52 Johnston (2014).

Mimicry is the second pathway to attract support for change.<sup>53</sup> In the context of great powers, the mechanism operates through emulation where leading countries serve as exemplars. The policies of advanced and powerful countries are often copied in a “follow the leader” approach since leaders may provide well-tested models and examples.<sup>54</sup> Some consider soft coercive pathways of hegemonic diffusion where a great power chooses a path that alters the status quo for others. Gruber defines go-it-alone power as the ability to unilaterally influence a government’s policy choice.<sup>55</sup> The European Union, for instance, offers the gold standard for digital privacy laws that firms implement across markets—a phenomenon Bradford coins the “Brussels Effect.”<sup>56</sup> Some consider the possibilities for a “Beijing Effect” where China draws others to copy its policies through the power of its example.<sup>57</sup>

These theories, however, have a common focus on hegemonic diffusion through one major superpower. In an era where the United States and Chinese policies clash, which model are countries more likely to emulate? There are reasons to doubt that the Chinese example could be readily copied. China is unique as a digital first mover with an early strategy to contain the dangerous impact of the Internet by establishing the Great Firewall and taking steps to fortify China’s cyber borders. The monumental undertaking required China to construct national Internet architecture around state control and build up a market of largely domestic Internet service providers. One of the reasons that China’s ability to propagate its vision of cyber governance might falter is because few countries took early steps to structure their national Internet connections in the same manner. In a global survey of domestic digital markets, Pan argues the path-dependent approach to allowing private organizations control over the Internet might make it more difficult to implement a statist approach to internet governance.<sup>58</sup>

The third pathway to alignment is persuasion.<sup>59</sup> Since the struggle to advance an agenda is contingent on support from other delegations, the logic of interactions within international organizations is built on the foundation of persuasion.<sup>60</sup> These social strategies attract support by convincing others, especially elites, that change is

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53 Johnston (2014).

54 Dobbin et al. (2007); Garrett and Weingast (1993).

55 Gruber (2000).

56 Bradford (2020).

57 Erie and Streinz (2021).

58 Pan (2017).

59 Keck and Sikkink (1998); McEntire et al. (2015); Johnston (2014); Finnemore and Hollis (2016).

60 Goodman and Jinks (2013), 22.

appropriate and necessary.<sup>61</sup> Persuasion is an inherently social process that encourages officials to change their minds by convincing them that alternative approaches are more appropriate. It involves argumentation, exchange, and deliberation to reach a consensus where one side accepts the legitimacy of a new practice or idea. As a result of successful persuasion, the gap between opposing viewpoints narrows.<sup>62</sup> Although persuasion is generally considered a tool of NGOs, scholars have shown that the way rising powers legitimate their rise matters to the types of coalitions it attracts, in a strategy where “right makes might.”<sup>63</sup>

In a social environment where both the rising power and dominant hegemon attempt to persuade a coalition, however, existing theories have yet to explain which ideas are most attractive at shaping opinions and mobilizing support. Although a variety of pathways promote diffusion, we have limited understanding of persuasion under hegemonic competition. Does the reigning hegemon pull more countries due to its dominant position in the system and the longer time horizon to socialize governments to accept and support its principles? There is little reason to think that material resources are a net benefit in a social environment. A hegemon, acting against the rules it established, can diminish legitimacy by imposing a system of double standards.<sup>64</sup> The rising power, however, does not simply gain from the hegemon’s missteps. Although China has shifted its stance from a “norm taker” to a “norm maker,” some argue that China’s particularistic ideas will attract more limited support and possess fewer pathways for diffusion.<sup>65</sup> Nye also views the options for China to attract others as limited, since those most likely to project soft power in an information age are those promoting ideas closer to attractive liberal culture.<sup>66</sup>

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61 Ikenberry and Kupchan (1990).

62 Johnston (2001); Johnston (2014), 155.

63 Goddard (2009).

64 Finnemore (2009).

65 Greitens (2020).

66 Nye (2000).

### 3. A Theory of Competitive Frames

To understand how China attracts support within international organizations, I draw from theories of social movements that explain which ideas dominate when messages compete.<sup>67</sup> Social movements are designed with an explicit purpose: to challenge existing ideas and methods of organization. As Carroll and Master note, “clearly, part of the task of social movements of whatever sort is to disorganize consent and organize dissent.”<sup>68</sup> Framing involves competition between groups to elevate one set of ideas to a dominant narrative,<sup>69</sup> which mirrors the goals of a rising power to de-legitimize the status quo and attract greater support for new methods of organization.<sup>70</sup>

#### Attracting a Coalition

China explicitly acknowledges the presence of competition in cyberspace. Since the competition to establish the global rules of the game in cyberspace is wrapped up in a battle to attract support within institutions, President Xi Jinping argued the “cybersecurity game of major countries is not only a technical game, but also a game of ideas and a game of discourse power.”<sup>71</sup> China implements a strategy to achieve “discourse power” or “the right to speak” within international organizations (*huayu quan*) aimed at creating a compelling narrative and offering ideas that “tell China’s story well” to the international community.<sup>72</sup> During a speech at the National Propaganda and Ideology Work Conference, President Xi Jinping directed officials to “strengthen our discourse power internationally” and spread China’s vision of governance.<sup>73</sup>

China’s efforts to mobilize support in cyberspace draw from strategies of framing familiar to social movements and political campaigns. Frames are “schemata of interpretation” constructing how an issue should be weighed<sup>74</sup> by placing emphasis on one set of considerations over others within communications. A framing effect occurs when “in the course of describing an issue or event, a speaker’s emphasis on a subset of potentially relevant considerations causes individuals to focus on these

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67 Carroll and Ratner (1996); Benford and Snow (2000); Zald (1996).

68 Carroll and Ratner (1996), 602; see also Schweller and Pu (2011).

69 Mooney and Hunt (1996); Bonilla and Mo (2019); Bonilla and Tillery (2020).

70 Schweller and Pu (2011)

71 Cyberspace Administration of China (2018).

72 Friedman (2022).

73 Xi (2013).

74 Goffman (1974), 21.

considerations when constructing their opinions.”<sup>75</sup> Choices about how to convey information are instrumental in producing differences in how opinions develop or reorient.<sup>76</sup> The way information is presented is also vital to mobilization. By identifying victims and developing frames about injustice, activists organizing social movements encourage greater participation and community support.<sup>77</sup> Subtle shifts in the presentation of information affect support for policies. Scholars have found that presenting the same outcome in positive or negative lights (e.g., 5 percent unemployment versus 95 percent employment) shifts the level of support for public policies.<sup>78</sup>

Framing operates by elevating a set of considerations within decision-making. Selecting appropriate frames narrows the values that individuals draw from when deciding whether to support policies. By placing emphasis on a certain set of issues, framing causes an individual to alter the foundations on which his or her decisions are based to consider the concepts extended by the frame.<sup>79</sup> Elevating one issue within a consideration set is especially helpful in issues characterized by complexity and high degrees of uncertainty to focus decision-making around one central consideration. One of the most dramatic instances of emphasis framing attracting a coalition to rally around a relatively obscure issue includes the Republican Party’s efforts to appeal to Evangelical Christian and Catholic voters by framing the issue of abortion around the rights of the unborn child. Emphasis framing is often strategic by tailoring frames to attract specific coalitions. When attempting to attract support for rallies, if a leader understands a group of individuals deeply treasures First Amendment liberties, a strategic frame will emphasize supporting the rally as a means of strengthening free expression. Politicians along the campaign trail draw from the strategies of social movements to strategically elevate preferred platforms by bringing certain issues to the foreground to sway voter’s consideration sets towards those where they possess a competitive advantage.<sup>80</sup> For instance, some of Truman’s success on the campaign trail resulted in reframing his campaign to focus on socioeconomic issues rather than international affairs.<sup>81</sup>

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75 Druckman and Nelson (2003), 730.

76 Chong and Druckman (2007).

77 Benford and Snow (2000).

78 Tversky and Kahneman (1985); Druckman (2001a).

79 Scheufele (1999).

80 Druckman (2001b), 230.

81 Busby et al. (2018).



Emphasis framing is especially relevant in cyberspace where states grapple with the complexities associated with the technology.<sup>82</sup> Rather than focusing on the technical challenges associated with cyberspace, framing shifts attention towards more commonly understood political values. When attempting to mobilize support in cyberspace, China uses framing to interpret the complexities of technology through the lens of sovereignty. China's frames confidently assert the power of governments to direct policies online. Against the liberal narrative of a borderless sphere, China's highly territorial and sovereign vision realigns the focus of international policy on governments as the key decision-makers. For instance, in a statement prepared with other members of the Shanghai Cooperation Organization (SCO), China submitted the "International Code of Conduct for Information Security" to the United Nations Secretary-General, calling for governments to "reaffirm that the policy authority for Internet-related public issues is the sovereign right of States, which have rights and responsibilities for international Internet-related public policy issues."<sup>83</sup> Sovereignty frames refocus attention away from uncertainty and technical details towards the widely understood and accepted concept of state sovereignty.

By highlighting sovereignty, China's framing directs attention on a statist ideology that privileges the primary of states. Emphasizing a statist ideology is likely to first attract governments that have strong preferences for elevating the role of governments over civil society and firms. Scholars have shown how existing ideological preferences impacts how governments sort into institutions, especially when guided by frames that direct a focus on who will benefit and how issues should be resolved. Evidence that statist governments will support China's proposals to augment sovereignty in cyberspace is strengthened by mobilization in other issue areas. When promoting China's RMB as an international reserve currency, China underscored the concept of sovereign independence by framing the adoption of the RMB as a currency "disconnected from individual nations" offering officials greater freedom of movement than relying on U.S. dollars. Countries sharing similar preferences for a statist rather than liberal ideology were the ones most likely to diversify their reserve currencies and adopt China's RMB currency as first movers.<sup>84</sup> Likewise, scholars have found that statist countries are also more likely to join China's alternative to the World Bank, the AIIB, for ideological rather than economic motivations, given the way the AIIB is framed as protecting the rights of non-interference by limiting the conditions imposed for loans.<sup>85</sup>

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82 Krasner (1991).

83 A/66/359 "Letter dated 12 September 2011 from the Permanent Representatives of China, the Russian Federation, Tajikistan and Uzbekistan to the United Nations addressed to the Secretary-General."

84 Liao and McDowell (2016).

85 Rodrigues Vieira (2018).

Cyber sovereignty frames should especially appeal to statist governments in cyberspace. Statist countries are largely dissatisfied with the focus on civil society and individuals within the free and open liberal vision of the Internet. Scholars have shown that these governments mobilize for sovereignty and support initiatives that codify government rights and protections.<sup>86</sup> Many statist countries see the diffusion of the Internet as a force that weakens sovereign control by providing greater opportunities for dissent and mobilization against the regime.<sup>87</sup> The anxiety of statist countries is heightened in the wake of the Arab Spring where activists took to social media to organize regime overthrow. These countries also see the heavy involvement of civil society—especially American technology firms—as limiting state power and control over basic internal necessities such as controlling public order and prosecuting criminal violations online given the widespread private control. Since many statist countries are motivated to protect domestic stability and national sovereignty in the face of dangerous information flows, China’s frames of sovereignty should attract and mobilize widespread support.<sup>88</sup>

**Hypothesis 1:** *China’s cyber sovereignty frames are most likely to attract states valuing a strong role of the government in world affairs.*

### The Resonance of Competitive Frames

It is not enough to simply attract existing ideological coalitions within international organizations. Shifts in the status quo often require a sufficiently sized coalition to pass proposals to codify new rules. Changing international organizations from within, at minimum, requires a majority and, at maximum, requires consensus, setting in motion a competition to attract votes from member states.

Resonance influences whether the frames of the rising power or dominant hegemon gain wider attractive force. Benford and Snow define “the concept of resonance” as “the effectiveness or mobilizing potency of proffered framing.”<sup>89</sup> Attempts to shift the status quo gain legitimacy by linking with existing ideas that ground deliberations and provide a respected compass to direct activity. Some speak of “grafting,” and “nesting” ideas into widely held or influential narratives, so new concepts are more likely to resonate with audiences and gain legitimacy.<sup>90</sup> Proposed changes that possess a higher degree of consistency with existing concepts can be associated with a higher likelihood of attracting support. For instance, in the global campaign to prohibit landmines, activists

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86 Ginsburg (2020).

87 Milner (2006).

88 Ginsburg (2020).

89 Benford and Snow (2000), 619.

90 Cortell and Davis (1996); Sikkink (1991).

raised greater support for banning usage when linking land mines with existing weapons taboos.<sup>91</sup> Resonance is especially relevant during the advent of new technologies when leaders link emerging issues with existing campaigns and platforms.<sup>92</sup>

As China attempts to attract support for change, promoting sovereignty is strategic as, “older norms are more likely to resonate with key audiences than novel, less-recognizable formulations.”<sup>93</sup> By framing changes in the international order as protecting sovereignty, China links with more widely accepted principles from an earlier Sovereign Territorial Order that the principal units of the international system are sovereign nation-states and no foreign entity is permitted to interfere in internal affair.<sup>94</sup> Although liberalism shares a common respect for the self-determination of states, it adds a respect for human rights and a commitment to universality that run contrary to the values of the sovereignty at the heart of the Sovereign Territorial Order, and enjoy less widespread support.<sup>95</sup> Evidence from other issue areas suggests the success of frames grounded in sovereignty and security relative to liberalism within the United Nations. More governments were persuaded about the need to collaborate on human trafficking when the problem was framed as an issue of organized crime rather than through a human rights lens focused on the rights of victims.<sup>96</sup>

China’s frames are likely to be widely appealing in the issue area of cyberspace by refocusing attention on government control in a medium that has been characterized as beyond sovereignty within a liberal narrative focused on the role of markets and the need to preserve a borderless sphere of communication. Governments struggle to contain dangerous digital threats silently seeping across borders that include misinformation, hacking, and computer viruses. China connects with existing widely respected values that resonate with officials struggling to defend their cyber borders. Sovereignty is in the DNA of states and the primacy of states is an attractive value to promote in a technical issue area where governments long took a back seat to guidance by engineers, technical experts, and civil society. On the other hand, the values of liberalism have, in some respects, become associated with the dangers of the Internet. The free flow of information — once exclusively hailed as the harbinger of process and human development — now also brings the threat of misinformation that states find especially threatening to regime stability and preserving trust in the sanctity of

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91 Cortell and Davis (1996); Sikkink (1991).

92 Snow et al. (1986).

93 Paris (2020), 463.

94 Paris (2020).

95 Lake et al. (2021); Simmons and Goemans (2021).

96 Charnysh et al. (2015).

elections.<sup>97</sup> Framing policies as emphasizing sovereignty should be especially attractive in cyberspace relative to those that promote Internet freedom and the free flow of information.

Framing issues as supporting sovereignty is likely to widely resonate beyond authoritarian states by linking with the campaigns of many swing states dissatisfied with the status quo. Framing is attractive to many non-aligned countries that prioritize the principle of sovereign equality in the face of colonial histories. Many coalitions, such as the Group of 77 (G77) and the Non-Aligned Movement (NAM), have agitated for change and greater fairness in the liberal international system. Many governments in these coalitions find common ground in sovereignty by contesting interference in domestic affairs.<sup>98</sup> NAM and the G77 have long espoused a need to shift towards a more equitable economic system. through a series of clashes and debates with wealthier countries on the proper institutional design for global governance.<sup>99</sup> Within a series of essays titled *Dialogue for a New Order*, prominent leaders of the bloc argue that the present world order is built on a structure of inequality. Framing focused on sovereignty and government rights is likely to pull a greater number of countries already dissatisfied with the liberal status quo towards change than arguments that build from the values of the status quo that non-aligned members have long sought to revise.

**Hypothesis 2:** *Cyber sovereignty frames mobilize greater support for collaboration than liberal frames.*

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97 Farrell and Newman (2021).

98 Rajagopal (2013).

99 Doyle (1982); Kim and Russett (1996).

## 4. Test One: Which Governments Mobilize

In test one of my theory, I consider how governments developed preferences for a technical organization—the International Telecommunications Union—after exposure to China’s sovereignty frames. A fundamental renegotiation of the treaty establishing the International Telecommunications Union, the International Telecommunications Regulations, occurred at the World Conference on International Telecommunications (WCIT-12). The conference was intended to modernize a telecommunications regulation last negotiated in 1988. At the onset, delegates expected discussions on roaming rates in mobile communications and other technical deliberations. The vote for the revised International Telecommunications Regulations (ITRs) is used to understand which governments mobilized once the vote for the revised ITRs was framed as supporting government interests in sovereignty, whereas the status quo of rejecting a treaty revision was framed as supporting liberalism. I find that ideological emphasis framing orients government preferences for a technical treaty toward decision-making grounded in existing ideological preferences. After exposure to competing frames from China and the U.S., the vote became wrapped up in thinking about the appropriate role of the state in Internet governance, with statist governments most likely to mobilize for change.

### Framing a Technical Organization

China has long framed the need for movement to the ITU as supporting government rights to sovereignty. At several of the Internet governance forums, such as the World Summit on Information Society (WSIS) and the Internet Governance Forum (IGF), China framed the need for restructuring multistakeholder institutions in favor of states.<sup>100</sup> At the WSIS China assertively argued that the Internet should be governed by states rather than civil society. To elevate governments, intergovernmental organizations must take control for cooperation to achieve a “multilateral, transparent and democratic” system of international governance.<sup>101</sup> China strongly advocates for regime shifting to intergovernmental organizations where Internet resources will “be jointly managed by all governments ... each state should have one vote. Private sector and the civil society and other stakeholders could widely participate in the discussion and express their advisory role. However ... they should have no decision-making power and right to vote on public policy issues.”<sup>102</sup>

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100 Galloway (2015); Negro (2020).

101 Hu (2005).

102 Galloway and Baogang (2014), 84.

China continued to build on these ideas at the renegotiation of the ITRs. At the WCIT-12 conference, a block of authoritarian countries comprised of Russia, China, Saudi Arabia, Algeria, Sudan, Egypt, and the United Arab Emirates promoted the role of the state in Internet governance through frames underscoring the role of governments. China argued for including a new article that member states “have the responsibility and right to protect the network security of the information and communication infrastructure within their state,” adding that member states should play a larger role to “supervise the enterprises operating ICTs in their territory to ensure the effective functioning of ICTs in secure and trustworthy conditions.” Other statist frames focused the states role in mitigating network threats. China and the Arab bloc focused attention on unsolicited content, or spam. Both groups emphasized state sovereignty in the face of dangerous information flows by arguing, “Member States should endeavor to take necessary measures to prevent the propagation of unsolicited bulk electronic communications and minimize its impact on international telecommunication services.”<sup>114</sup> The policy was framed as necessary to protect government security and enable governments to play a role in combating rising digital security threats.

The United States loudly contested ITU control over the Internet by framing the status quo through the benefits associated with free markets. Within submissions to the work of the conference, Washington argued the Internet should remain under the jurisdiction of multi-stakeholder organizations such as the Internet Society, the Internet Engineering Task Force (IETF), the World Wide Web Consortium (W3C), the Regional Internet Registries (RIRs), and the Internet Corporation for Assigned Names and Numbers (ICANN).<sup>103</sup> Multi-stakeholder organizations should continue to be relied upon due to their nimble ability to “address issues with the speed and flexibility required in this rapidly changing Internet environment.” The U.S. cited the growth of firms like Google and Cisco as a key demonstration of what progress an open Internet can generate and the possibilities of GDP growth from a liberal approach to the Internet.<sup>104</sup>

The U.S. also framed ITU control over the Internet as impacting human rights, especially the right to free expression. As U.S. Representative Doris Matsui explained, given the leadership of China to encourage the shifts, “any international authority over the Internet is troublesome, particularly if those efforts are being led by countries where censorship is the norm.”<sup>105</sup> Intergovernmental organizations could be co-opted and “recruited in aid of censorship and repression.” U.S. representatives argued multi-

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103 United States, Document 9-E, <https://www.itu.int/md/S12-WCIT12-C-0009/en>.

104 Ibid.

105 Matsui (2012).

stakeholder governance must be preserved due to the inclusive, transparent, and open decision-making process involving civil society that supports a market-oriented approach to Internet governance.<sup>106</sup>

The United States deployed the might of civil society to frame the need to preserve the status quo. U.S. technology giant Google argued the global community would be embarking down a dangerous path that would limit the freedom, openness, and prosperity of the status quo if international organizations gain a greater role within Internet governance. Google actively lobbied against the role of the ITU and attempted to prevent the ITU from gaining authority over the Internet. Outlining the rationale behind the U.S. position, Google argued that the Internet prospered because governments allowed the Internet to grow organically with civil society, academia, private sector, and voluntary standards bodies “collaborating on development, operation and governance.” The ITU, on the other hand, “creates barriers to civil society participation” and would hinder progress and development by providing firms with more limited roles.<sup>107</sup> The decision taken during the WCIT-12 therefore have the “potential to put government handcuffs on the Net” through “a fundamental shift in how the Internet is governed.”<sup>108</sup>

### Independent Variable: Ideological Preferences

China’s attempts to shift the ITRs to a statist vision should be most compelling to those with preferences for a strong role of the state. I measure ideological orientations by first considering a government’s existing preferences for the role of governments versus markets and individuals. To measure ideological orientations, I first consider a government’s existing preferences for the role of governments versus markets and individuals in world affairs. One way to measure ideological affinity include using voting patterns at the United Nations.<sup>109</sup> To consider ideological preferences, I use the IdealPoint developed by Bailey, Strezhnev, and Voeten that measures a latent preference for international ideologies.<sup>110</sup> Those with a close distance to the United States represent those that tend to vote along with the United States in support of individual rights and the role of markets, whereas those with a greater distance reject liberalism more frequently and instead prefer statist ideology.

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106 Verveer (2012).

107 Cerf (2012).

108 Ibid.

109 This follows steps used within studies of the United States Congress to move beyond a dichotomous measurement of Republican or Democrat to capture ideological preferences along a continuum.

110 Bailey et al. (2017).

Other ways to measure preferences for the role of the government include focusing on domestic institutions. To measure coalitions that should be attracted to China's frames on the merits of the ideas and the attractive force of China's sovereignty frames I deploy the V-DEM liberal democracy index, which measures the quality of democracy by the domestic limits placed on government, including protection civil liberties and checks and balances. The liberal model takes a "negative" view of political power through the limits placed on government. Countries where fewer limits exist are more statist countries that allow government officials wide latitude in decision-making at home.

I also examine support from independent governments operating outside of typical ideological coalitions through two measurements.<sup>111</sup> There is no agreed-on approach of identifying such governments, but scholars typically start by excluding ideological coalitions such as liberal democracies that align closely with the United States, including the European Union. To analyze governments in the middle, I divide the IdealPointDistance measurement of ideology into thirds to analyze patterns in voting from liberal, independent, and statist governments. Other ways of capturing governments with less established ideological preferences are governments from decidedly non-aligned coalitions that are founded on a basis of rejecting joining alliances with major superpowers. I create indicator variables for the Group of 77 (G77) using records provided by the United Nations Cybersecurity Focal Point at the Office for Disarmament Affairs.

## Controls

In the realm of power politics and institutions, many anticipate coercion, or the threat of coercion determines movement toward a hegemon or rising power's preferences. In studies of nuclear non-proliferation treaties, scholars examine whether susceptibility to sanctions drives states to adopt U.S. preferences for non-proliferation given strong trade ties with the U.S. creates channels for the U.S. to credibly threaten to impose costs.<sup>112</sup> As China emerges as a major power, studies consider whether the expectations of coercion are borne out in the relationship between China and trading partners. Scholars have examined a similar question involving the impact of African trade ties with China on voting in the United Nations in the face of greater susceptibility of these countries to coercive influence from Beijing.<sup>113</sup> To measure the possibility for China to hold up trade for votes, I use COMTRADE data of a country's export dependency on China measured through Chinese exports out of total GDP to create a TRADE DEPENDENCE (CHN) score. In other words, if China's ideas are compelling

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111 Maurer and Morgus (2014).

112 Miller (2014).

113 Carmody et al. (2020).



then we should see governments mobilizing based on values and political orientations. If China's coercion and material impact is more compelling, voting for the revised ITRs should be more likely from governments with greater connections and ties China could threaten to hold up and revoke.

Others expect that the rising power "pulls" governments to support initiatives through the attractive force of material benefits.<sup>114</sup> Hegemonic stability theory argues support for institutions arises due to the provision of public goods from a hegemon. To consider the potential for public goods provision to pull governments towards China, I follow other studies that measure the influence of "pull factors" through China's Belt and Road Initiative.<sup>115</sup> The Belt and Road provides infrastructure and development assistance to countries along a land and sea corridor. Using the records of the Australian Strategic Policy Institute, I create a dataset focused on China's Digital Silk Road investments in Telecommunications, Training, Public Security Projects, Smart Cities, Security Inspection Equipment, Telecommunications Cables, and 5G relationships. These relationships capture the benefits a country receives from technical collaboration with China through a count variable of the number of technical projects (DIGITAL SILK ROAD).

Finally, some theories anticipate that the hegemonic influence of the United States should dominate. To measure the potential of coercion from the United States, I specifically focus on a state's ability to gain intelligence from Washington's control over the decentralized system. I deploy a logged measure of United States defense cooperation agreements (DCA) with countries that Washington can threaten to revoke, DCA.<sup>116</sup> Many U.S. agreements have provisions for intelligence sharing that provide benefits from the U.S. control over data. I also develop an original variable measuring a government's reliance on American technology firms for intelligence. I download transparency report data from Google, an American firm with widespread global market share, and create the measure INTEL (GOOGLE) that captures the number of times a government contacts Google to receive social media evidence for law enforcement, terrorism, and security investigations. For instance, governments could desire to use Google Maps to track a criminal's activity and locations. The measure more broadly indicates a government's reliance on American multinational technology corporations for digital intelligence and approximates a government's position within the U.S. system of intelligence sharing and information.

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114 Broz et al. (2020).

115 Broz et al. (2020).

116 Kinne (2018); Kinne (2020).

Other expectations focus on a government's demand-side calculations that shifts the analytical focus away from great power politics towards the material benefits that the ITRs offer governments and the reasons why cooperating in the ITU might be more beneficial to developing governments or those lacking capacity. Governments with limited capacity could be more likely to desire cooperation through intergovernmental organizations, such as the ITU, that provide capacity building assistance. I first measure a government's domestic digital capacity through VDEM's Digital Society project that develops rankings of each country by surveying national experts. REGULATORY CAPACITY measures whether "the government have sufficient staff and resources to regulate internet content in accordance with existing law?" to serve as a proxy for legal capacity in the area of digital affairs. Governments also mention a "digital divide" and call on capacity building efforts to foster the ability of governments to participate in internet governance and express preferences for institutions. I use the Digital Society Project's TECHNICAL CAPACITY which measures whether "the government have sufficiently technologically skilled staff and resources to mitigate harm from cyber-security threats?"

Other measures of capacity arise through development status and expertise. Some governments could desire to collaborate within international organizations due to the capacity building programs such as the ITU's digital skills assessment and digital transformation centers. Following Voeten, I use include gross national product (GNP) per capita as a proxy for economic development.<sup>117</sup> I also follow Bader, by measuring development capacity in the realm of telecommunications and Internet governance by using Internet penetration rates to capture the "digital divide" between those with Internet access and those without.<sup>118</sup> Some governments may even lack digital diplomatic expertise with the norms and issues of cyber governance. Since 2004, the United Nations meetings to develop rules for the Internet were held in a small forum, the Group of Governmental Experts (GGE) typically only comprised of experts from 15–25 countries out of the 192 member states. At the United Nations Open-ended Working Group discussions on cybersecurity, experts briefed officials on the history so that each delegation is privy to the same degree of knowledge about United Nations cybersecurity negotiations. These briefings implicitly acknowledge a disparity in knowledge and experience among government officials that did not participate in the GGE meetings. Using records of GGE attendance, I create a variable measuring how many times a government attended the GGE discussions to form the variable DIPLOMATIC CAPACITY.

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117 Voeten (2000), 206.

118 Bader (2019).

Grievances are another area that can “push” governments to demand change.<sup>119</sup> Discomfort may arise from the openness of the order. Although the liberal international order brings economic benefits and rapid growth from openness, it also brings allows threats since there is nothing to stop malicious code or misinformation from seeping across borders. I measure grievances with the openness of the LIIO through the amount of misinformation a government experiences domestically.<sup>120</sup> The Digital Society Project measures the level of foreign misinformation a government experiences by surveying experts with the question, “how routinely do foreign governments and their agents use social media to disseminate misleading viewpoints or false information to influence domestic politics in this country?”

### Assessing Mobilization

My analysis of the vote for the revised ITRs finds governments mobilized on the basis of ideological preferences, providing support for the expectations of Framing Hypothesis 1 that framing focuses attention on the ideological aspects of the vote to attract support from coalitions with similar preferences (Table 1). In model 1, statist governments supported delegating greater authority to an institution within the United Nations rather than continuing to operate within a decentralized and commercialized multi-stakeholder governance model. The positive, statistically significant coefficient on the ideology indicator means that statist governments with preferences father from the U.S. are more likely to mobilize with China to vote in favor of the ITRs.

Predicted probabilities from the model provide further support for the attractive power of sovereignty among governments with more statist preferences. While holding all other controls at their means from Model 1, I find that statist countries like Azerbaijan, that have a score of 3.10 out of 4.62 have a 0.99 (i.e., 99 percent) predicted probability of voting in favor of change towards greater centralization, with a 95 percent confidence interval (0.84, 1.00). Liberal democracies like Denmark, that have an ideological ideal point distance of 1.5 have only a 0.5 (i.e., five percent) predicted probability, with a 95 percent confidence interval (0.00, 0.63) of voting in favor of the ITRs. The analysis from Figure 1 reflects an ideological divide between statist and liberal countries when votes for a technical treaty are framed through an ideological lens.

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119 Broz et al. (2020).

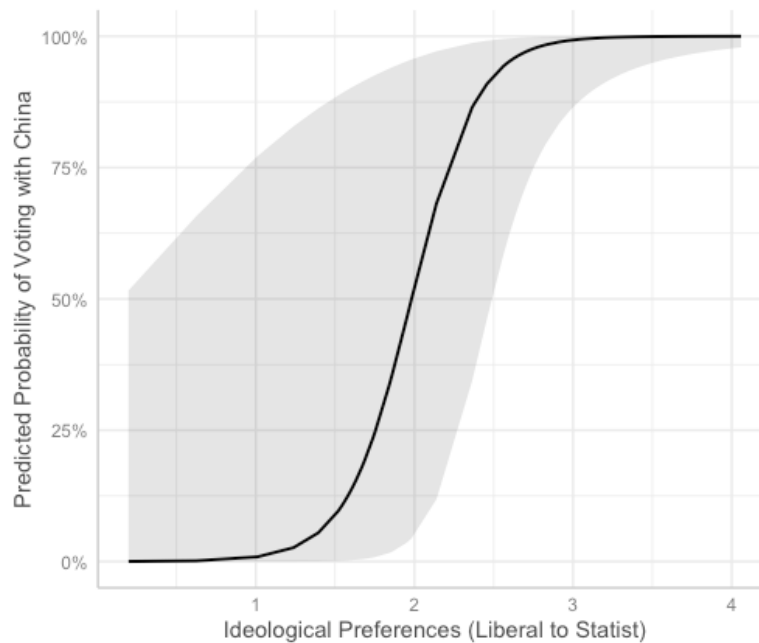
120 Farrell and Newman (2020).

Table 1: WCIT-12 Treaty Renegotiation Votes

	<i>Dependent variable:</i>
	Voting for the ITRs = 1
Ideology	4.847** (1.861)
Regime Type	-2.850 (2.706)
G77	3.180* (1.548)
Internet Penetration	-16.295 (8.344)
Digital Silk Road	2.111* (0.897)
Trade Dependence (CHN)	6.637 (21.677)
DCA (US)	1.213 (0.692)
Intel (Google)	-0.393 (0.295)
Diplomatic Capacity (GGE)	1.053 (0.909)
GDP per Capita	3.476* (1.612)
Technical Capacity	0.069 (0.903)
Regulatory Capacity	-0.928 (0.689)
Misinformation	1.018 (0.684)
Constant	-36.110** (13.503)
Observations	112
Log Likelihood	-18.331
Akaike Inf. Crit.	64.661
<i>Note:</i>	*p<0.05; **p<0.01; ***p<0.001

The positive coefficient for the G77 suggests that China’s sovereignty frames also mobilized developing countries. While holding all other variables at their means, membership in the G77 has a 0.97 predicted of voting for the ITRs. The G77 was founded on the basis of presenting a united front of developing countries within the United Nations. The findings of the G77 mobilizing with China and supporting the initiatives of Beijing parallel mobilization in other issue areas. Even as China rises and gains economic might that shifts China’s economic status away from many members in the G77, it continues to attract support,<sup>121</sup> because of the resonance of China’s sovereignty frames. As Fung notes, part of China’s appeal derives from frames, as “the cornerstone of China’s relationship with the Global South is an emphasis on the respect for sovereignty.”<sup>122</sup> Through repeatedly framing the need for international collaboration to respect sovereignty and the rights of governments, China pulls and attracts developing countries to support Beijing within international organizations. Other variables, such as the negative coefficient on Internet penetration rates suggests that cyber sovereignty may be attractive to governments with a lower digital development status.

**Figure 1.** Ideology and Votes for the ITRs



121 Dittmer and George (2010).

122 Fung (2016), 35.

The results support the expectations that China's ideas shape how governments mobilize in support of the updated ITRs over the power of material factors. I find little evidence to suggest that as China gains greater ability to hold up exports to China's market that countries move in sync with China at the ITU. Likewise, from the U.S. side, I find limited support for higher numbers of Defense Cooperation agreements with the United States driving countries towards voting against the ITRs. Many countries such as Saudi Arabia mobilized for the ITRs despite relying heavily on the United States for military assistance and digital intelligence. In addition, governments that are highly dependent on Google for data from social media channels to investigate crimes and security threats are no more likely to vote against the ITRs. The results strongly counteract the claims that a competition between China and the United States will mainly rely on coercive might and the potential for superpowers to push coalitions towards preferred institutional preferences on the basis of dependencies that powerful governments can threaten to revoke. However, there is some evidence for the attractive force of China's Digital Silk Road, as governments collaborating with China on digital infrastructure projects are more likely to vote with China.

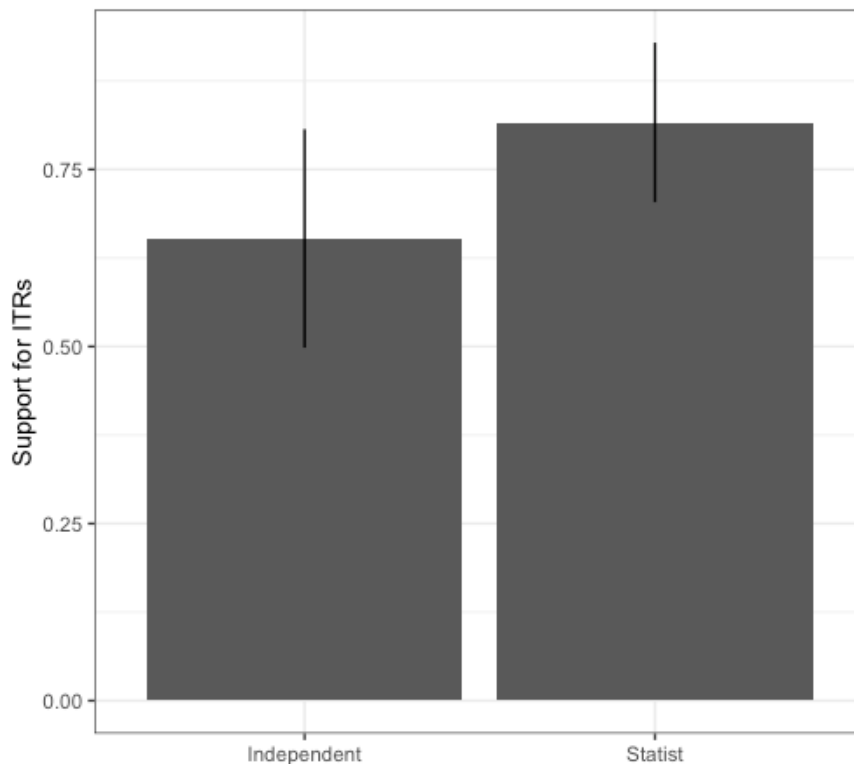
I find more limited support for demand side explanations driving support for the ITRs. Governments experiencing a higher level of misinformation at home were no more likely to support international solutions contained in the ITRs to address the rising security threats associated with the Internet. I also find limited support for some types of capacity driving votes, including the insignificant results for technical and regulatory capacity. Surprisingly, governments with a higher GDP per capita are more likely to mobilize for the revised ITRs, challenging expectations that a desire to strengthen capacity from engaging with ITU programming drives support of the treaty revisions. The potential for a knowledge gap, as measured through a country's attendance during the GGE discussions of rules and norms, did not lead to any significant impact on the ability of governments to participate in the updated ITRs.

## **Test Two: Mobilizing for Sovereignty**

Overall, China mobilized greater support than the United States as 89 countries voted for the revised ITRs and 55 opposed, supporting the expectations of Hypothesis 2. I conduct two types of analysis to further explain which countries mobilized for the sovereignty in the face of competitive frames from the U.S. First, I break down the vote for the ITRs to examine which countries provided China with a winning coalition. Next, I isolate the ideological competition between the United States and China by conducting content analysis on the debates from the treaty negotiations where both great powers attempted to mobilize a coalition on the basis of ideological frames using original materials for the archives of the International Telecommunications Union.

I assess the attraction of China’s cyber sovereignty frames by considering support received from each coalition. In an additional analysis using an ordinal measurement of ideology, I find further support for the expectation that China attracts independent governments. I analyze an ordinal variable of ideology with the factors measuring liberal, statist and independent governments. The baseline probability of voting with China for the ITRs for statist countries is roughly 14 percent for liberal countries but 80 percent among independent countries and 90 percent among statist countries. In other words, statist countries are 81 points more likely to vote for the ITRs than liberal governments and independent governments are roughly 65 points more likely than liberals. Even governments without strong preferences for the role of the state in world politics were attracted to sovereignty frames advocating for centralizing governance of the internet within the jurisdiction of the ITU (Figure 2).

**Figure 2.** Support for the ITRs



Despite an ideological division between statist and liberal governments, sovereignty frames ultimately attracted greater support because they mobilize non-aligned governments and independent states. I consider “independent states” as those in between liberal and statist countries. These countries include governments such as Rwanda, Mozambique, and Ethiopia. These independent states largely supported the

updated ITRs with 35 countries voting in favor and only 9 countries voting against. The results strongly suggest that although the United Nations has long been seen as a clash between ideological coalitions in the East and West, the countries in the middle of the divide matter. Independent countries provided China with a majority in the vote for the ITRs, as more countries mobilized on behalf of China's position to support state sovereignty by centralizing governance of the Internet at the ITU.

Statist governments include governments such as Iran, Cuba, Zimbabwe, Vietnam, and the United Arab Emirates. In the statist coalition, 47 countries supported the ITRs by voting yes and only two governments voted against, offering strong support for the expectation that China's cyber sovereignty frames widely pull governments that value a strong role for the state. Out of the governments in the liberal coalition that includes countries such as Denmark and Switzerland, only seven countries voted for the ITRs and 42 voted against, reflecting an ideological divide as the U.S. attempted to persuade a coalition against support. One element that is notable is sovereignty frames attracted some liberal states to vote with China. The liberal states that voted for the ITRs include South Korea, Turkey, Ukraine, South Sudan, Panama, Papua New Guinea, and Russia (in 2012). Notably, South Korea stands out as a strong alliance partner of the United States.

Despite voting on a technical treaty, liberal states expressed concern that the vote shifts from the liberal status quo. Many liberal governments noted that any shifts in the role of the ITU is seen as shifts away from liberalism. The Canadian delegation argued it would no longer be able to sign the ITRs because the proposals inserted into the treaty represented unacceptable shifts in the status quo. Using liberal frames, Ottawa rejected the modified treaty and argued it must "reaffirm its commitment to an open private sector-led Internet, one in which people are free to participate, communicate, organize and inform information." Israel noted that, "the ITU is not asked to occupy any specific or unique role in the establishment of cybersecurity standards, a role already carried out by other multi-stakeholder bodies such as the IETF, W3C, and others." The European Parliament adopted a resolution in advance of the WCIT-12 negotiations that all 27 member states that are signatories to the ITRs refuse to support delegation to the ITU. The European Union (EU) advanced a vision of the "internet as a truly public place, where human rights and fundamental freedoms, particularly freedom of expression and assembly are respected." As such, the EU argued that the "ITU, or any other single centralized institution" is not the "appropriate body to assert regulatory authority over internet governance."



## Tracing the Mechanism

I conduct a case study on one specific area of the debate to trace how sovereignty framing shapes responses from governments when in competition with liberal frames. I focus on debates over the Treaty Preamble, that sets out the purpose of the text as follows: “promoting the development of telecommunication services and their most efficient operation while harmonizing the development of facilities for world-wide telecommunications.” Content analysis from the debates reveals that framing the need changing the preamble through the lens of sovereignty and the rights of governments mobilized greater support by shifting the focus of the debate on governments. As China focused attention on the rights governments should enjoy, other governments took up the call and began to advocate for changes to the preamble, including the African Group. Ultimately, China’s frames attracted greater support than liberal frames, allowing the treaty to be updated with language supporting China’s position over the U.S.

## A Clash of Frames

The United States used emphasis framing to focus on a liberal ideology. Washington proposed a modification to the preamble of the ITRs to better align the text of a technical treaty with existing international human rights law. The U.S. delegate proposed inserting language into the ITRs that “Member States must affirm their intention to implement these Regulations in a manner that respects their human rights obligations, which are not altered in any way.” The U.S. advanced the need to protect individuals within the issue area of telecommunications to suggest that obligations are not open to debate or subject to change within Internet governance or any other issue areas. Washington’s preamble proposals shifted the technical nature of the ITRs towards a liberal emphasis on individual rights.<sup>123</sup> Many liberal countries argued in support: Sweden argued “technical treaties can have human rights implications”<sup>124</sup> and Switzerland emphasized the necessity as, “human rights are indispensable.”<sup>125</sup>

Rather than only focusing on traditional human rights obligations grounded in individual freedoms, China focused the debate on the rights and benefits that belong to governments under international law. According to China, human rights, as traditionally defined, are too narrow. Rights within the Treaty Preamble of the ITRs should also include government rights to “sovereignty, the security of the state, the right of subsistence, the right of development, and the right of achieving the

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123 United States statement, 12 December 2012, WCIT-12 Plenary 8.

124 Sweden, 12 December 2012, WCIT-12 Plenary 8.

125 Switzerland, 12 December 2012, WCIT-12 Plenary 8.

Millennium Development Goal and the rights of bridging the digital divide.” The Chinese delegation argued that rather than exclusively focusing on traditional human rights, which are secondary concerns to the basic needs of many Member States, the negotiation should privilege the interests of governments. China’s frames shift considerations of human rights away from the traditional focus on individuals to center evaluations on the rights of nation-states and the needs of countries to provide for populations. China argued without emphasizing the rights of nation states in the preamble, the treaty would not be equitable or balanced:<sup>126</sup>

So the text in the square bracket or the text proposed by the U.S. delegates, neither of them are in line with our basic principle, because it only emphasizes the obligations of the Member States. It doesn’t touch upon the responsibilities of the Member States. Member States have the right to subsistence, and they have the right to development and they also have the right to access. So, neither of the two texts are balanced texts.

China’s frames link with previous debates about the right to development to widely resonate with governments previously mobilizing in support of new human rights. China’s proposal for inserting the right to Internet access into the treaty draws from earlier ideas advanced during the formation of the Right to Development (RTD) in 1986. After the scourge of colonization, the realization of the RTD within the United Nations Declaration on the Right to Development (UNDRTD) was seen as a major breakthrough for developing countries.<sup>127</sup> The RTD evolved the classical paradigm of human rights focused on individual freedoms to secure a collective right that “every human person and all peoples are entitled to participate in, contribute to, and enjoy economic, social, cultural and political development.”<sup>128</sup> The Chinese delegate underscored that the conception of human rights in the ITRs should link with RTD ideas of “human rights for individuals as well as Member States which includes the rights of surviving, the rights of development.” The right to development and internet access both emphasize the role of the nation-state in leading the process of securing economic and social well-being for citizens.<sup>129</sup> The RTD shifts traditional human rights focused exclusively on protecting individuals to protect collective interests and state rights and responsibilities. In Article 3, the UNDRTD emphasizes, “States have the primary responsibility for the creation of national and international conditions favorable to the realization of the right to development.” By fulfilling their duties, states will promote a “new international economic order”

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126 China, 12 December 2012, Plenary 8.

127 Arts and Tamo (2016).

128 Declaration on the Right to Development, General Assembly resolution 41/128, December 1986, Article 1.1.

129 Rajagopal (2013).

based on “equality, mutual interest and co-operation among all States.”<sup>130</sup> Language focused on governments underscores the interests of states and advances an understanding that governments must meet certain development standards prior to ensuring other rights for individuals. The Right to Internet Access has a high degree of alignment with the Right to Development that should widely resonate with developing and non-aligned countries.

### Mobilizing for Government Rights Online

Many governments mobilized positively in response to China’s emphasis on government rights and state sovereignty. Once China put government rights on the table, codifying new human rights within the ITRs appeared necessary to many officials. As expected, many statist governments responded favorably to China’s treaty language emphasizing the primacy of states. Some governments even echoed China’s arguments. Iran reiterated China’s language that if governments have human rights obligations, they must also enjoy protections as, “in order to be balanced, Member States should have access to the International service.”<sup>131</sup> Cuba emphasized the need to protect member state rights is a higher-order concern than protecting human rights, since member states are comprised of individuals. Some countries argued the conception of human rights presented by China fits with national conceptions of rights focused on governments. Bahrain argued sovereignty frames focused on government rights to the Internet should be accepted without question as the Human Rights Council recognizes the right to Internet access as a human right.<sup>132</sup>

Some countries specifically weighed the United States’ proposal for human rights relative to China’s proposal to support government rights and protect the right to Internet access. Togo strongly supported government rights, “if the ITRs do not recognize the rights of States, what purpose do the ITRs serve?”<sup>133</sup> Many officials appeared baffled that incorporating government interests is not automatically accepted. Burundi argued that “Fair access to international telecommunication service should not divide us. These are Human Rights.” Burundi went on to elaborate support for a statist position through the logic that, “even if we’re talking about Member States. Member States are made up of people; of individuals.”<sup>134</sup> Botswana recapped that the deliberations over the Preamble of the ITRs involved a choice between the “Rights of the Member States” over “human rights.” In the debate, Botswana’s

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130 Declaration on the Right to Development, General Assembly resolution 41/128, December 1986, Article 3.3.

131 Iran, 13 December 2012, Plenary 14.

132 Bahrain, 13 December 2012, Plenary 14.

133 Togo, 13 December 2012, Plenary 14.

134 Burundi, 13 December 2012, Plenary 14.

representative emphasized why the right of the Member States' access to international telecommunication services has great national importance and resonance:<sup>135</sup>

If, for instance, we are to provide as a state services to our citizens, we must first of all as a state or as a Member State have access to those services in order for our citizens to claim them from the state. And when you talk about eEducation, eCommerce, eHealth, all of those are content that is transmitted through the International telecommunication infrastructure, and the state has to have a right of access.

Many liberal governments openly rejected China's proposals and raised alarm about shifting from a traditional human rights focus on individuals towards collective rights. The United States led the coalition to argue that adding access of member states to telecommunications is not acceptable as "human rights obligations go to the individual."<sup>136</sup> Liberal governments rejected the reinterpretation of rights away from individuals towards member states. Sweden expressed alarm at the interpretation of human rights since "human rights are for individuals, not for States."<sup>137</sup> Other governments like the United Kingdom balked at language emphasizing the rights of states, arguing "The text respecting the rights of access of all Member States to telecommunication services appears to create new human rights language." Denmark reiterated an understanding based on individuals rather than states that "human rights is a question about citizens rights and it should remain like that." Switzerland strongly denounced trying to create a new human right and argued since individual rights are human rights, putting them on an equal footing with Member States does not seem appropriate.<sup>138</sup> However, importantly, some liberal countries that originally supported the United States' human rights proposal also expressed support for the proposal granting governments rights. While arguing for a defense of "a free and open Internet," Costa Rica expressed some degree of openness to a right of Internet access.<sup>139</sup>

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135 Togo, 13 December 2012, Plenary 14.

136 United States, 13 December 2012, Plenary 14.

137 Sweden, 13 December 2012, Plenary 14.

138 Switzerland, 13 December 2012, Plenary 14.

139 Costa Rica, 13 December 2012, Plenary 14.

## Mobilizing the Winning Coalition

Since each government did not receive equal time on the floor, I use votes to supplement an understanding of statements and consider the degree of mobilization each frame generated. As Algeria mentioned without analyzing the vote, one would “overlook the Member States who haven’t taken the floor, the silent Member States. Prior to a vote we’re unable to really know what everybody thinks.”<sup>140</sup> The focus on government rights was advanced by many countries following China. The African Group, for instance, proposed a modification of China’s proposal as a last-minute compromise. During the Fourteenth Plenary session, the African Group argued the preamble of the ITRs should be revised to “recognize the right of access of all Member States to international telecommunication networks and services.” Near the end of the conference during the Fourteenth Plenary, the Chair formulated suggestions into one statement to put to a vote. The vote for resolution DT/55 read, “These Regulations recognize the right of access of Member States to international telecommunication services.” The vote for the proposal to adopt the resolution on government rights within the updated ITRs reflects the pull of statist treaty language. The archives of the ITU voting records reveal that 77 countries supported the proposal for inserting language protecting government’s rights, 33 countries voted against, and eight abstained. China’s sovereignty frames focused on government rights proved effective at institutional coalition building as 56 countries were needed to have the resolution pass with a majority, ensuring that the text was inserted into the ITRs, as Beijing originally argued was necessary. The vote provides evidence suggesting Member States are more likely to mobilize when issues are proposed as supporting government rather than individual interests, suggesting the power of frames to shape how countries mobilize in support of shifts in the status quo.

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<sup>140</sup> Algeria, 13 December 2012, Plenary 12.

## 5. Conclusion

My research demonstrates the surprising power of frames to attract and mobilize a coalition within the United Nations family of institutions to support “revolutionary change” in the operation of the international information order. Using frames focused on sovereignty and government rights, China attracted greater support for initiatives than policies the United States proposed to support liberalism. After tracing the votes for the ITRs, I isolate the impact of frames by using the vote for the preamble where the United States proposed inserting stringent human rights protections, whereas China proposed strengthening the rights of governments to Internet access. My study of voting patterns and statements related to ITU authority reveals frames focused on government rights generated widespread support and mobilization for reform and regime shifting within Internet governance.

China’s ability to attract a large coalition within the ITU is surprising. It might seem reasonable to expect that international law proposed by an authoritarian country will stay contained to authoritarian organizations based on recent discoveries about the sorting of authoritarian states into international organizations. Autocracies use regional organizations to structure mutually beneficial relations<sup>141</sup> by cooperating through the Commonwealth of Independent States, the Shanghai Cooperation Organization, the Bolivarian Alliance for the Peoples of Our America, and the Gulf Cooperation Council to promote domestic regime stability. Authoritarian states reap benefits from the provision of resources to support weaker authoritarian states and military interventions to suppress revolutions.<sup>142</sup> These organizations are tools for “authoritarian learning” by distributing resources for dictators to hold power and perpetuate their rule by drawing from proven models used by other autocrats.<sup>143</sup>

Through the power of sovereignty frames, my research demonstrates that authoritarian international law is on the move. Framing focused on sovereignty is not only attractive to regional coalitions of authoritarian states. Some doubt that authoritarian countries could have a large impact beyond regional organizations. Emmons argues that influencing international organizations towards autocratic preferences is challenged by the stickiness of institutions. The super-majorities needed for institutional reform challenge autocrats’ ability to implement illiberal reforms in organizations with deeply embedded liberal values.<sup>144</sup> Given the obstacles and the costs associated with codifying treaties and developing formal rules, most expect

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141 Cottiero and Haggard (2021).

142 Libman and Obydenkova (2013); Libman and Obydenkova (2018); Debre (2021b); Cottiero and Haggard (2021).

143 Debre (2021a).

144 Emmons (2020).

authoritarian interests to remain contained within only a club or regional exercise supported by small groups of authoritarian states. However, I demonstrate that frames containing the rights of sovereignty and security are highly attractive over liberalism and provide a powerful winning coalition for China to mobilize support for reform within multilateral organizations—including the International Telecommunications Union as the United Nations technical body.

My findings from regime shifting to the International Telecommunications Union suggest that China's socialization and the power of ideas matter in ways that scholars traditionally focused on material resources have yet to fully consider. A more detailed understanding of China's approach underscores the importance of expanding the scope of the "soft power" literature to include a focus on strategies of socialization that include framing the need for change.<sup>145</sup> Power has many different faces, including economic, military, and power over opinion.<sup>146</sup> Yet, while economic and military sources of power are well-understood, we have not fully mapped how a rising power *attracts* greater influence. By demonstrating how China uses the power of framing to shape preferences, I echo claims that power can be "multifaceted" and "exerted more subtly and gradually."<sup>147</sup> China uses widely popular sovereignty frames to organize and mobilize coalitions in support for reform.

The findings also build an understanding of the social strategies deployed by rising powers. China's focus on socialization is surprising as most studies examine the impact of socialization on China.<sup>148</sup> My research flips the analytical lens to demonstrate how China uses the same strategies of socialization to shape the preferences of other governments as a rising power motivated to establish a new vision of international order.<sup>149</sup> My work contributes to the burgeoning focus on China's rhetoric<sup>150</sup> and power of persuasion to show how China attempts to attract governments towards an alternative ideology. Revisionism in the twenty-first century looks differently from the historical ledger of change. China is not overturning or destroying institutions the United States built. Instead, China uses socialization to compel and induce change in institutions towards an alternative ideology.

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145 Druckman and Bolsen (2011).

146 Carr (1939); Baldwin (2016).

147 Kelley and Simmons (2019), 504.

148 Johnston (2014).

149 Chin (2012); Galloway and Baogang (2014); Schweller and Pu (2011), see footnote 58 where the authors argue work on China's efforts to socialize is "undertheorized."

150 Yang (2021); Fung (2020).

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