

Digital Policy Hub – Working Paper

Digital Regulatory Networks and Evolving Internet Governance Spaces

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About the Hub

The Digital Policy Hub at CIGI is a collaborative space for emerging scholars and innovative thinkers from the social, natural and applied sciences. It provides opportunities for undergraduate and graduate students and post-doctoral and visiting fellows to share and develop research on the rapid evolution and governance of transformative technologies. The Hub is founded on transdisciplinary approaches that seek to increase understanding of the socio-economic and technological impacts of digitalization and improve the quality and relevance of related research. Core research areas include data, economy and society; artificial intelligence; outer space; digitalization, security and democracy; and the environment and natural resources.

The Digital Policy Hub working papers are the product of research related to the Hub's identified themes prepared by participants during their fellowship.

Partners

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Key Points

- Australia, Canada, Ireland, the Netherlands and the United Kingdom have all devised digital regulators forums. These forums increase regulators' capacity for evolving digital regulations by bringing competition, privacy and communications regulators together to share insights, data and policy approaches toward the regulation of online platforms.
- In Canada, emerging digital policies – namely, Bill C-63, the Online Harms Act – will require the proposed Digital Safety Commission to develop a digital regulatory collaboration with the Canadian Radio-television and Telecommunications Commission (CRTC).
- The CRTC has experience with such collaborations, making this its second digital regulators forum, with its first being the Canadian Digital Regulators Forum it shares with the Competition Bureau, the Office of the Privacy Commissioner and the Copyright Board.
- In addition to domestic regulatory forums, internationally there are regulatory collaborations in both online harms-type digital policy as well as broadband development.
- The emergence of digital regulators forums can allow for comprehensive digital policy; however, with these forums in early stages, there are questions as to how they will achieve this comprehension.

Introduction

Internationally, there are regulations being developed for services on the internet. As Terry Flew (2021) notes, countries are drafting domestic policies and working together to coordinate global internet governance strategies. Domestic digital policy encompasses areas such as concentration of personal data, online harms, online news remuneration and other similar policies aimed to increase competition within the digital sector. The digital sector can be defined as products and services that are sold in an online marketplace, either through financial payment or through the collection of personal data for later sale to advertisers. Concurrently, there are also areas of global internet coordination that are of interest to countries. This includes work at the Internet Corporation for Assigned Names and Numbers (ICANN), which develops policies and frameworks for the coordination of certain internet resources such as domain names. As the internet has become more pervasive in everyday life (DeNardis 2020), economic concentration of online spaces that users visit on the internet has erupted, resulting in only a handful of companies controlling key components of the internet experience, such as in search, social networking and information storage (Plantin et al. 2018; Curtin 2020). Countries have predominantly focused on their unease regarding this concentration of control, with domestic competition policy as key to their digital policy agendas and political rhetoric, leaving the work of internet coordination to multi-stakeholder internet governance venues such as the Internet Governance Forum (IGF) hosted by the United Nations, ICANN

meetings and areas of internet standardization led by the private sector through the Internet Engineering Task Force for constant internet evolution (ten Oever 2021).

As countries grapple with regulating the internet to increase competition in the face of centralized power by a few internet companies — namely, Alphabet/Google, Meta, Amazon, Apple and Microsoft — they are faced with a plethora of challenges. Included among these challenges is ensuring their regulations do not interfere with how the internet operates globally. An example of this is digital regulations in one jurisdiction resulting in corporations changing their business models globally in order to comply. The European General Data Protection Regulation (GDPR) is known for its “Brussels Effect,” which has resulted in European privacy frameworks shifting corporate privacy policies for users around the world in order to benefit from the GDPR (Bradford 2012). In countries’ struggles to develop domestic digital policies, they are responsible for following internationally agreed-upon policies set out within multilateral governance forums (for example, at the World Trade Organization). Additionally, governments must assess their operational capacity for regulating new spaces and the learning challenges that these new regulatory environments encompass, such as learning how online intermediaries’ business models work, which may require knowledge of computer science, advertising and global financial markets for shifting transcontinental companies’ corporate structures. One tool that governments are utilizing is creating digital regulators forums to assist with this learning.

Digital regulators forums or networks have the capacity to allow regulators increased communications and data sharing regarding the digital sphere both domestically and internationally. It is important to regulate this digital sphere to ensure the effective steering of this sector of the economy for the public interest. Steering is the governance process by which governments or directors of organizations will use various policies or frameworks to guide actors into certain desired pathways (Mayntz 2016). In the political sense, steering is a governance tool to shape economies and sectors in specified ways, with many arguing for the importance of steering in the public interest (Blomqvist 2016; Hantke-Domas 2003).

This paper works to analyze digital regulators forums in both the domestic and international context to identify how these spaces have the capacity to change internet governance processes and spaces through the introduction of these forums as a policy innovation.

The Interplay of Domestic Digital Policy and Global Internet Governance

Internet governance is a broad space. It can include areas of internet coordination, telecommunications policy, online content regulations, cybersecurity and data privacy, to list a few examples (van Eeten and Mueller 2012; DeNardis 2013). Digital policy is also found in this vast space of internet governance. Bhaso Ndzendze (2022) identifies digital policy as a source of complexity in public policy where new digital spaces have emerged and analogue systems have been digitized. This results in digital technologies becoming the foundation of broader spaces and infrastructures, resulting in new policy lenses needed for a digitized world.

Analyzing domestic digital policy provides us with a lens to see how global internet governance might shift in the future. For example, a country's domestic approach to personal data protections might signal their intention to governing more areas of the digital sector. Kieron O'Hara and Wendy Hall (2021) describe how the internet is experienced differently around the world depending on the user's geographic location and the policy approaches their occupied space entails. As a result, one country's domestic digital policies make for an entirely different internet experience than in other countries (contrast, for instance, China's closed-off internet versus the United States' open and corporatized internet) (Bradford 2023). Countries and regional blocks such as the European Union push for certain internet governance provisions on a global level — such as in personal data protection — based on their ethos on human rights protections, which are contained in their domestic digital policies. This then has the capacity to shape the internet globally, or at least across similar digital markets in transnational business processes as with the GDPR (Bradford 2012). While each country or regional block has its own digital rights — the legal and imagined human rights that exist online (Karppinen and Puukko 2020) — an overarching blueprint for human rights online represents an important cornerstone. The most prominent among these digital human rights is the right to connectivity: globally, efforts continue to ensure full connectivity for individuals around the world regardless of their physical location and its geographic terrain (such as rural and remote settings, mountainous areas or those surrounded by water, all of which might make access difficult) (Parks 2015). Universal access to the internet is therefore a key digital policy goal and is prominent during IGF discussions.

Achieving this goal will mean access for those with disabilities and a base-level digital literacy capacity, in addition to reliable broadband access. Domestic digital policies must work to enable universal access and develop digital literacy. And part of this goal will also entail the ability to access various websites without being blocked from certain online services (Nuechterlein and Weiser 2013), as well as having a sense of safety and inclusivity online. For example, if young women are met with misogynistic speech and high levels of surveillance, this would likely deter them from accessing the internet, thereby creating a gender gap between individuals who are comfortable online and those who are not. Therefore, digital policy must ensure both a base level of internet access and online equity, which will enable a greater population demographic to feel secure online and utilize the internet for personal and professional growth and innovation.

Policy Learning for Governance Success

Learning is a key component of developing regulations and policy frameworks (Heikkila and Gerlak 2016). As Nanette S. Levinson (2020) notes, there are five types of learning that occur within internet governance spaces: governance learning, network learning, policy learning, interorganizational learning and organizational learning. Each of these forms has different parameters. For example, governance learning centres itself around how new ideas and forms of knowledge are utilized in a governance space by different actors. Interorganizational learning focuses on both formal and informal groups of organizations utilizing new information and processes for their networked activities. Digital regulators forums fall within both of these governance and interorganizational learning processes, whereby networks of regulatory actors share information to push the fulfillment of digital policies. In doing so, these networks become routinized to the new information they share with one another, utilizing a broader systems approach to learning and capacity development, thereby thinking in the broad contexts of digital spaces as opposed to the narrowed views of their respective business models (for example, a communications regulator focused on online news remuneration is introduced to the broader data collection frameworks that allow online platforms to operate).

Policy learning for digital regulators forums can be thought of as working similarly to the necessary information analysis and teamwork that underpin collaborative governance theories. In collaborative governance, complex policy spaces are approached by multiple actors working together to solve problems faced by varied groups of stakeholders (Ansell and Gash 2008). Multiple actors work to scope problems that no one actor could conceivably solve on their own (Gash 2016). To do this, actors must learn from one another to find solutions that allow for the consensus of all stakeholders and the problems to be fully rectified. In the digital regulators forums, multiple government actors come together to collaborate and learn from one another in order to take a comprehensive policy approach to regulating the digital sector. Through this collaboration, the forums share information that can help their affiliated government departments and agencies coordinate digital policies.

To share information, these digital regulators forum participants would need to sign memorandum of understanding (MoU) agreements at both the national and international levels, if their membership exists across multiple countries. The purpose of MoU agreements is to specify areas where government agencies have a common interest and share information and resources to extend their own capacities without increasing costs incurred by a single agency (such as in higher labour costs for increased personnel) (Suhardin and Flora 2021).

Analysis of Domestic and International Digital Regulators Forums

Digital regulators forums have emerged as a new policy tool to help regulators shape coordinated policy approaches to the digital sphere. As noted in the creation of the United Kingdom’s Digital Regulation Cooperative Forum, digital platforms, such as Google, Twitter/X and Netflix, are not part of one area of the broader economy and therefore one regulator. Instead, these platforms operate along multiple regulatory spaces, thereby creating a policy opportunity for regulators to identify policy positions in the collective public interest rather than their narrowed regulatory purviews.¹ Developing digital regulators forums, however, can be difficult. In Canada, for example, the Canadian Digital Regulators Forum (CDRF) emerged from an existing MoU signed in 2013 between the Competition Bureau, the Canadian Radio-television and Telecommunications Commission (CRTC; Canada’s communications regulator) and the Office of the Privacy Commissioner. These three agencies were the founding members of the CDRF. This MoU was created to address the Canada Anti-Spam Legislation:² it allows for the Competition Bureau, CRTC and Office of the Privacy Commissioner to share enforcement information in the CDRF, but among their three respective agencies. While this MoU allowed for the creation of the CDRF with these initial three existing Canadian regulators, it excludes other existing and emerging federal regulators and agencies from this forum to share regulation and enforcement information, thereby limiting the holistic governance capacity the CDRF could demonstrate. For example, Bill C-63, the Online Harms Act, requires a newly proposed Digital Safety Commission to consult with the CRTC to the extent of carrying out each regulator’s respective mandates.³ In the context of online harms, it would likely be beneficial for the future Digital Safety Commission to be part of the CDRF for the purposes of data sharing with the CRTC and the Office of the Privacy Commissioner, as well as learning more about the business models of regulated online platforms to which the Competition Bureau would have access. Therefore, formulating digital regulators forums is best done from the ground up, with the capacity to be transparent and open to the inclusion of other stakeholders in the future.

There are five prominent digital regulators forums internationally in Australia, Canada, Ireland, the Netherlands and the United Kingdom. Table 1 identifies these forums, their affiliated departments, and whether the digital regulators forum for each respective country has public reporting or notices for audit.

1 See www.drcf.org.uk/about-us.

2 See <https://competition-bureau.canada.ca/how-we-foster-competition/collaboration-and-partnerships/canadian-digital-regulators-forum-terms-reference>.

3 Bill C-63, *An Act to enact the Online Harms Act, to amend the Criminal Code, the Canadian Human Rights Act and An Act respecting the mandatory reporting of Internet child pornography by persons who provide an Internet service and to make consequential and related amendments to other Acts*, 1st Sess, 44th Parl, 2024 (first reading 26 February 2024), online: <www.parl.ca/DocumentViewer/en/44-1/bill/C-63/first-reading>.

Table 1: Countries with Domestic Digital Regulators Forums

Country	Regulators Forum Name	Year	Affiliated Departments	Public Reporting?
Australia	Digital Platform Regulators Forum	2022	Australian Competition and Consumer Commission Australian Communications and Media Authority eSafety Commissioner Office of the Australian Information Commissioner	Yes — full website with publications, news releases and contact information for the group.
Canada	CDRF	2023	Competition Bureau CRTC Office of the Privacy Commissioner	Yes/no — notice of first year’s work on studying artificial intelligence; however, this is hosted on various hyperlinked Government of Canada webpages as opposed to a dedicated website.
Ireland	Digital Regulators Group	2022	Data Protection Commission Broadcasting Authority of Ireland Commission for Communications Regulation Competition and Consumer Protection Commission	No — no website.
Netherlands	SDT	2021	Netherlands Authority for Consumers and Markets Dutch Authority for the Financial Markets Dutch Data Protection Authority Dutch Media Authority	Yes/no — some content is available hyperlinked across various Government of the Netherlands webpages; however, there is no central website for the SDT.
United Kingdom	DRCF	2020	Competition and Markets Authority Information Commissioner’s Office Office of Communications (Ofcom) Financial Conduct Authority*	Yes — breadth of work, including terms of reference, policy papers, research analyses and transparent data.

Source: Author.

Note: * Joined the DRCF in April 2021. DRCF = Digital Regulation Cooperation Forum; SDT = Digital Regulation Cooperation.

As Table 1 demonstrates, there are varying degrees of openness and transparency across the digital regulators forums. Some groups have websites with clearly identified administrative contacts, while others do not. Canada and the Netherlands offer limited transparent information, unlike their peers in the United Kingdom and Australia. Ireland's Digital Regulators Group has the lowest level of transparency by not hosting a website with clear information about the forum. The Netherlands' Digital Regulation Cooperation Platform has published more documents than the CDRF; however, these documents are disbursed and linked across different Government of the Netherlands webpages, making transparency an errand to chase instead of a standard practice. The CDRF does not have its own dedicated website: all of its published documentation is available through public webpages, predominantly hosted by the Competition Bureau.⁴

Hosting documents through hyperlinking webpages is a common practice across digital regulators forums. International digital regulators forums, as opposed to the domestic networks analyzed in Table 1, also have documents and news releases hosted on one forum's website, as identified in Table 2. This indicates a level of experimentation by these respective governments in developing collaboratives and attempting to have increased transparency; however, they are lacking either the technical acumen for full transparency or the resources for hosting websites that meet government standards (for instance, by being accessible and multilingual). With transparency and accountability acting as pillars to ensure that governance processes and frameworks are legitimate in the citizens' views, the digital regulators forums have created a legitimacy issue by reducing this required transparency (Considine and Afzal 2011).

Table 2 demonstrates that digital regulators forums are emerging both in specific topic groups (such as online safety) and in the coordination of domestic digital regulators forums. With this emphasis on international collaboration among digital regulators forums, it can be argued that international affairs teams within their respective forums have an enhanced role in ensuring the success of these spaces for policy exploration and development.

As Tables 1 and 2 show, digital regulators forums, which have been an emerging trend since 2020, are now gaining momentum and going global, representing a shift in both domestic digital policy and international internet governance.

⁴ See <https://competition-bureau.canada.ca/how-we-foster-competition/collaboration-and-partnerships/canadian-digital-regulators-forum>.

Table 2: Sample International Digital Regulators Associations/Forums

Initiative	Led by	Countries	Public Reporting?
Global Online Safety Regulators Network (Ofcom 2024)	United Kingdom	<p>Members:</p> <ul style="list-style-type: none"> Australia (eSafety Commissioner) Fiji (Online Safety Commission) France (Arom) Ireland (Coimisún na Meán) Republic of Korea/South Korea (Korea Communications Standards Commission) Slovakia (Council for Media Services) South Africa (Film and Publications Board) Netherlands (Autoriteit Terroristische Content en Kinderpornografisch Materiaal) United Kingdom (Ofcom) <p>Observer Status: (5Rights, Family Online Safety Institute, INHOPE, WeProtect Global Alliance)</p> <ul style="list-style-type: none"> Canada (Canadian Centre for Child Protection, Department of Canadian Heritage) European Union (Intergroup on Children’s Rights) Germany (Freiwillige Selbstkontrolle Multimedia-Diensteanbieter e.V.) New Zealand (Netsafe, Te Mana Whakaatu) 	Yes/no — Handful of public-facing documents that are hosted on a specific member country’s website as hyperlinks. There is no specific website for the network.
INDRC	UK DRCF	<ul style="list-style-type: none"> Australia (Digital Platform Regulators Forum) Ireland (Irish Digital Regulators Group) Netherlands (Digital Regulation Cooperation Platform) Canada (CDRF)* United Kingdom (DRCF) 	Yes/no — content is currently hyperlinked on the DRCF’s website; however, there are no specific publications or documents published by the INDRC at the time of writing.

Source: Author.

Note: * Canada joined in January 2024. Other members created the group in June 2023 (DRCF 2024). INDRC = International Network for Digital Regulation Cooperation.

Conclusion

Digital regulators forums can be thought of as new spaces for digital policy and internet governance. They are the emerging policy spaces that allow for open data sharing across government agencies, thereby increasing capacity without incurring significant costs. As this working paper has shown, these collaborations are quite new, leading to spaces of experimentation within these groups and across different ones. Digital regulators forums have areas for growth, specifically for transparency, as a key mechanism for legitimizing them through accountability measures to such open operational information, as well as building forums from the ground up to allow greater control over participating regulators. Overall, digital regulators forums are an opportunity in the global shift to regulate services on the internet. They will be important in identifying pathways forward for complex policy approaches in the digital sector.

Recommendations

- **Recommendation 1:** Digital regulators forums ought to increase transparency in their work. They would do well to publish analyses they conduct as demonstrable outputs to their respective publics. For a start, digital regulators forums should have their own dedicated websites for easy review as a central hub for their public-facing communications and work.
- **Recommendation 2:** Expanding international affairs offices, bureaus, departments and/or teams will allow the internationalization of digital regulators forums. International affairs teams likely have experience in drafting MoU agreements between international counterparts for regulators. These teams would benefit from being expanded to allow for the constant international environmental scanning for digital regulators forums and to seek opportunities to join international regulators forums such as the Global Online Safety Regulators Forum.
- **Recommendation 3:** Purposefully hire to increase expertise (i.e., meaningfully recruit). Digital regulators forums are a product of the staff who formulate these groups and share information with one another across agencies and departments. If actors within a digital regulators forum do not have strong data analysis skills, this could result in poorly analyzed data across multiple departments, leading to problems. Therefore, regulators ought to focus on meaningfully recruiting and strategically hiring for expertise, specifically in the area of digital policy, and ensure that top performers have a seat at the table for these digital regulators forums.
- **Recommendation 4:** Increasing partnerships with researchers at public universities will allow gained expertise from non-regulated experts within countries. Experts are also found within the private sector and non-profit sector; however, this could have a perceived or actual conflict of interest for regulators. Academic researchers, specifically those at publicly funded post-secondary institutions, do not pose such conflicts and would be strong stakeholders to include as either “observers” or “non-status members” of digital regulators forums convened on certain topics of interest. This observer status is akin to the Global Online Safety Regulators Network but is instead used with domestic digital regulators forums.

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