



# Three Faces of the State in Local Cyberspace Administrations: Development, Regulation, and Surveillance in China's Internet Governance

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## Abstract

How does the Chinese party-state address the diverse and often conflicting challenges of internet governance? This study examines this question by analyzing the institutional design of municipal cyberspace administrations (MCAs), a key yet understudied group of local state actors. It brings together three often siloed state frameworks—the developmental state, the regulatory state, and the surveillance state—to theorize the roles MCAs are tasked with performing. Based on content analysis of responsibility areas from 137 MCAs, the study finds that these institutions are designed to fulfill all three roles, which coexist but are hierarchically arranged, with surveillance as the dominant focus. These roles include censoring the internet to maintain social stability, regulating China's internet industry and infrastructure, and promoting the development of local digital economies. A case study of the Xianyang MCA further illustrates how these roles are reflected in organizational design and annual activities, with a notable emphasis on developmental tasks. The findings demonstrate the value of an integrated state framework for understanding the dynamic and multilayered nature of China's internet governance regime.

**Keywords** Cyberspace administration · Internet governance · Developmental state · Regulatory state · Surveillance state

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## Introduction

China is facing increasingly complex challenges in internet governance. As of 2024, the country has nearly 1.1 billion internet users, with an internet penetration rate of more than 78% [21]. This vast and highly active online population presents a significant governance challenge for the ruling party-state, whose primary objective is to maintain social stability [5, 44]. At the same time, the rapid growth of China's internet giants, such as Alibaba, Tencent, Didi, and TikTok, has created complex regulatory issues. Compounding these domestic challenges is the intensifying technological rivalry between China and the United States, which has placed information and internet technologies at the center of global competition [43]. The emergence of AI-driven innovations [39] has further underscored the urgency for China to develop core internet technologies and strengthen its digital infrastructure.

How does the Chinese party-state address these diverse and sometimes conflicting challenges? One way to approach this broader question is to examine how the party-state designs its governance institutions. This study examines part of this puzzle by focusing on China's municipal cyberspace administrations (MCAs). As municipal-level branches of the Cyberspace Administration of China (CAC)—widely recognized as the most important actor in China's internet governance [35, 53, 57, 58]—MCAs have been gradually established to reduce local fragmentation and manage core challenges arising from the internet. Specifically, this study asks: How are MCAs institutionally designed to fulfill the often divergent mandates of digital innovation, regulatory enforcement, and political control at the same time?

To answer this question, this study draws on three distinct frameworks: the developmental state, which emphasizes state-led economic modernization and industrial policy [7, 41]; the regulatory state, which highlights the expansion of rule-based governance mechanisms [47, 61]; and the security/surveillance state, which prioritizes political control and social stability [15, 64, 72, 75]. Using these three state frameworks as heuristic lenses to categorize the roles assigned to MCAs, this study argues that their coexistence and hierarchical arrangement are both expected and significant. Together, these frameworks help conceptualize the multiple and sometimes contradictory roles that MCAs are expected to perform within China's evolving internet governance system: a developmental role, a regulatory role, and a surveillance role.

By analyzing a unique dataset on areas of responsibility from 137 MCAs, this study finds that MCAs are designed to prioritize their surveillance role by censoring the internet and maintaining social stability. At the same time, they also play a regulatory role by promoting stronger regulation of the internet industry and stricter enforcement of cyberspace security standards. In addition, a considerable number of MCAs have been tasked with developing local internet and big data industries. In this regard, MCAs are often expected to be entrepreneurial in initiating and implementing digital economy policies, thereby playing a developmental role. A case study of the Xianyang MCA further shows how it has structured its internal organization and carried out annual activities to fulfill the three state roles, though with a strong focus on development. This indicates that the hierarchical order of the three state roles often varies and depends on local imperatives.

These findings make several contributions to the study of Chinese internet governance. Theoretically, although the three state frameworks are often discussed separately in the literature [15, 39, 47, 61, 72, 75], this study shows that all three are essential for understanding China's approach to internet governance. First, it demonstrates that an integrated framework—one that acknowledges both coexistence and hierarchy among the three state roles—provides a more comprehensive depiction of the internet governance landscape. Second, it shows that these logics are not merely abstract concepts but are embedded in the institutional design and organizational activities of MCAs.

Empirically, this study extends the focus beyond the well-studied central institutions, such as the CAC [10, 16, 17, 34, 35, 57, 58, 69], by highlighting the important role played by MCAs. These actors are critical for managing governance challenges in a fragmented political context marked by dual leadership [20] and ongoing tensions with other bureaucratic bodies [10, 16, 64]. In doing so, the study emphasizes the importance of examining local institutions to fully understand how internet governance operates on the ground in China.

Finally, the study illustrates how scholars can more effectively use documents produced under China's Open Government Information initiatives—such as budget reports—to gain new insights into otherwise opaque institutions, including cyberspace administrations at different levels [16, 55, 64]. This approach provides a promising strategy for advancing empirical research on critical but underexamined parts of the Chinese party-state.

In the following sections, this paper presents three established narratives of Chinese statehood that inform the three roles of the cyberspace administration: economic developer, internet regulator, and stability maintainer. It then explains how these three roles are operationalized using a dataset on MCAs and presents the findings. The next section provides a case study of the Xianyang MCA, illustrating how the three roles are reflected in other institutional aspects of MCAs. The final section concludes with the empirical findings and discusses their implications for internet governance.

### **Conceptualizing the Roles of State Institutions in China's Internet Governance: Developmental, Regulatory, and Surveillance**

Issues of statehood lie at the heart of most major debates about Chinese politics. In this section, an integrated conceptual framework is proposed, drawing on insights from three frameworks of the Chinese state found in the literature: the developmental state, the regulatory state, and the security or surveillance state.

#### **The Developmental State**

The concept of the developmental state was first introduced by Chalmers Johnson to explain Japan's and South Korea's industrialization [41], challenging the conventional wisdom of neo-utilitarian theories. A developmental state features four intrinsic characteristics: depoliticized elites who can autonomously construct and implement economic policy, investment in educational opportunities, policy approaches that respect the economy's price mechanism, and coordination of public-private partnerships by

state-led institutions. This concept has been further developed through similar efforts, such as Amsden's [2] approach to "getting prices wrong" and Evans' [25] analysis of "embedded autonomy," all of which highlight the beneficial role of the state in economic transition. As summarized by Leftwich [46], developmental states may be defined as states "whose politics have concentrated sufficient power, autonomy and capacity at the center to shape, pursue and encourage the achievement of explicit developmental objectives, whether by establishing and promoting the conditions and direction of economic growth, or by organizing it directly, or a varying combination of both."

It is not surprising that China's state-led approach to economic development and the transition from a planned to a market economy has reignited debate about the developmental state. China's economic "miracle" is underpinned by the rise of "entrepreneurial capitalism" in the 1980s, when a vibrant rural entrepreneurial class emerged, and by "state-led capitalism" in the 1990s, evidenced by massive investment in state-allied business [37]. This path of growth, supported by the state's intensive control of capital inflow, import substitution and export-promotion trade policies, and a bank- and credit-based financial sector, contributes to the narrative of a developmental state with Chinese characteristics [7, 31, 45]. Nevertheless, corruption has emerged as a significant challenge. In response, President Xi's leadership has opted for centralization of power to combat corruption and restore the balance between China's role as a party-state and its role as a developmental state [76].

## The Regulatory State

States invariably develop new capacities to assume new roles as they enter new spheres. In contrast to the developmental state, which emphasizes embedded, autonomous market–state relations, a meritocratic bureaucracy, and policy interventions guided by pilot organizations, a regulatory state governs the economy by establishing rules for proper market behavior and creating independent bureaucratic institutions to enforce those rules. In the post-Keynesian crisis period, when economic governance relied heavily on direct state intervention, Western European states deliberately privatized state-owned enterprises and decentralized decision-making, contributing to autonomous regulatory authorities, the hallmark of "regulatory capitalism" [47]. The core function of the regulatory state is therefore to enforce the rules of market behavior and promote market competition.

The global diffusion of the regulatory state reached China in the 1990s, when the country embraced the massive privatization of state-owned enterprises. Proponents of the Chinese managerial and regulatory state point to the rationalization of existing institutions and the creation of new ones to manage the unruliness of the market and govern emerging market competition [89]. China's emerging regulatory state is also evident in the centralization of authority within certain bureaucratic units and in efforts to remove the state and military from direct ownership and management of for-profit enterprises. This is further illustrated by the consolidation of the previously fragmented regulatory bureaucracy and new legislation addressing public concerns, such as coal mine safety [74]. Arguably, these practices of the regulatory state align with the Polanyian logic of a "protective response" [62] in the development of a modern market economy.

## The Security/Surveillance State

While the regulatory state thesis tends to portray a trajectory toward professional, rational, law-based regulatory institutions, the security/surveillance state thesis depicts the Chinese state along the path of authoritarian social control and stability maintenance. A substantial body of literature has emerged to explain the rise of the stability maintenance regime in China, addressing the origins, organizational structure, and consequences of the domestic security system [5, 26, 57, 62, 72, 84, 85]. The standard focus in this line of inquiry is the organizational expansion of the coercive sector, as well as the rapid growth of funding for domestic security. The Chinese party-state's preoccupation with coercive apparatuses in maintaining stability has been widely viewed as a bulwark of China's developmental authoritarianism [90].

Central to this mode of state action is the mobilization of the security and police sector, which can suppress opposition and deter future protests by raising the costs of coordinating collective action [24]. Another key feature of the security state is tight surveillance over society, particularly of public opinion and expression [64]. Furthermore, the ongoing techno-security rivalry between China and the United States [43, 48], coupled with China's aspiration for an "integrated national strategic system and strategic capabilities" [14], has further driven China's securitization practices and contributed to the formation of a "techno-security state" [13]. Indeed, although economic development remains vital to the Chinese Communist Party (CCP), the Chinese leadership under President Xi appears to have "embraced a new guiding principle that elevates security alongside development as a key policy focus" [72].

## Toward an Integrated State Framework in China's Internet Governance

The developmental, regulatory, and surveillance state frameworks have each offered valuable perspectives on China's evolving governance landscape. These frameworks emphasize distinct institutional logics—state–market embeddedness, rule-based oversight, and political control under the CCP, respectively—but have often been examined in isolation, with a few notable exceptions [57, 61]. In the domain of internet governance, recent studies on China's cyberspace administrations—key actors since President Xi came to power—have similarly tended to focus on a single role, most often portraying them as surveillance actors responsible for content control [1, 13, 14, 27, 47]. A smaller body of research has begun to explore their roles as regulators [34] or developmental actors [48, 57]. However, integrated analyses that address how these roles operate in tandem remain rare.

This study brings the three state frameworks into dialogue to better theorize China's multilevel internet governance, where challenges from political control, market regulation, and digital development are increasingly salient. Rather than functioning as separate regimes of action, developmental, regulatory, and surveillance frameworks manifest as state roles that frequently coexist within a single institution—not due to design incoherence, but because the party-state explicitly assigns multiple, analytically distinct roles to the same actor. Here,

coexistence is understood as the simultaneous institutional assignment of distinct roles to one entity, often reflected in its formal mandates or organizational design. Such coexistence is not merely empirical noise but is deeply rooted in China's adaptive governance, which seeks to maximize political flexibility [33]. Unique arrangements, such as the blurring of boundaries between party and state [36, 91], the tension between the rule of mandates and the rule of law [6], and the under-institutionalized and unclear division of labor [33], have all contributed to the creation of hybrid institutions. A prime example is the CAC, which operates simultaneously as a party organ and a state regulator [16, 34, 55, 64], and performs both developmental and regulatory roles [57]. Similarly, the concept of the "double-bind regulatory state" [55] in China's internet and social media industry highlights the tension between maintaining political control and ensuring a favorable business environment, suggesting that regulatory roles are always entangled with political control considerations. In addition, initiatives such as the New Infrastructure program illustrate how digital innovation agendas are mobilized simultaneously for economic modernization and for extending party oversight through AI and big data [32].

However, coexistence does not imply equality. A second key proposition of this integrated framework is that the three roles often operate within a hierarchical logic that is contingent and varies over time. In China's authoritarian context, surveillance and stability maintenance typically take precedence, especially under President Xi's leadership, which has emphasized "the party leads everything" and promoted a "party-centric governance model" for the internet [69]. Yet the dominance of political control is not absolute. At the local level, cyberspace administrations may treat supporting digital industry growth as equally important as enforcing censorship [36]. Historically, since the early 1990s, the party-state has oscillated between promoting the internet as a driver of economic growth and expanding surveillance capacity to maintain regime stability [6, 17, 32, 36, 91]. The dynamic adjustment of role prioritization is thus often necessary and reflects broader shifts in the party-state's strategic goals.

Ultimately, this integrated framework allows us to conceptualize MCAs not as fixed embodiments of a single state logic, but as institutional arenas where multiple state roles coexist and are hierarchically arranged according to the evolving priorities of the party-state. Since the CAC's establishment in 2014, local cyberspace administrations at the provincial, municipal, and county levels have been gradually created under the corresponding party committees, typically with overlapping leadership, including the propaganda departments [35]. Among these, information on MCAs is the most accessible and abundant, making them the empirical focus of this study. Importantly, MCAs operate under a dual-leadership structure, accountable to the municipal party leadership and subject to oversight by provincial cyberspace administrations [19]. This arrangement is likely to introduce substantial variability in how MCAs are structured and tasked, creating an important opportunity to examine how local cyberspace administrations navigate the often-divergent mandates of digital innovation, regulatory enforcement, and political control.

## The Empirical Context: Using the Areas of Responsibility to Assess the Assigned Roles of MCAs

### Data

To investigate the assigned roles of MCAs, this study relies on a unique source of information: the descriptions of their areas of responsibility (*bumen zhize*) included in annual budget reports (*yusuan baogao*). The Open Government Information Regulations, which took effect in May 2008 and were revised in May 2019, stipulate in Article 20 that financial budgets and final accounts must be proactively disclosed by administrative organs. In addition, the revised Budget Law of the People's Republic of China (2014) requires that budgets of governments and their departments at all levels be disclosed to the public within 20 days of approval.

Although there remains considerable variation in how local governments comply with these disclosure requirements [22, 68], more budget reports have become publicly available from a range of local public organs. MCAs, in principle, are also obliged to disclose their annual budget reports. In such reports, an MCA typically provides not only the total amount and other details of its annual budget but also a description of its areas of responsibility. These descriptions constitute a rare and valuable source for understanding the assigned roles of MCAs, given the lack of other publicly available information, such as official websites or consistent media coverage.

This study collects data from 419 municipal-level governments. To increase the sample size and ensure coverage of important regional governments, it also includes observations from sub-provincial cities such as Dalian, as well as the 86 districts and counties under the four special municipalities: Beijing, Shanghai, Tianjin, and Chongqing. In total, 271 budget reports from MCAs were identified. All reports were downloaded directly from each municipal government's official website, where annual budget reports of all public organs are typically disclosed under the heading "Budget Disclosure" (*yusuan gongkai*). Of these 271 reports, 58 treated areas of responsibility as confidential and did not disclose them. An additional 76 provided only very general descriptions of responsibilities that could not be meaningfully analyzed. For example, the budget report of the Ningbo MCA simply states that it is "in charge of cybersecurity and informatization" [60].

This study analyzes 137 budget reports from all MCAs. Although most of these reports are from 2022, the dataset also includes reports from earlier years because of inconsistent disclosure practices across municipalities. Specifically, it contains one report from 2017, two from 2018, 12 from 2019, nine from 2020, 17 from 2021, and 96 from 2022. This uneven temporal distribution reflects the irregularity of MCA budget disclosure. In some years, certain MCAs released no budget reports, while in others, their reports omitted key information, most notably their stated areas of responsibility. For instance, the sole 2017 report is from Yan'an, which fully disclosed its areas of responsibility only that year and provided only limited information in subsequent years. Similarly, the two 2018 reports from Rizhao and Tulufan contain detailed disclosures, but both cities classified such information as confidential starting in 2019.

Three important caveats must be noted. First, although the data spans multiple years, this is not a longitudinal study [52] and assumes that the areas of responsibility of the MCAs did not change significantly between 2017 and 2022. This assumption rests on two considerations. On the one hand, a six-year period is relatively short; on the other, the institutionalization of cyberspace administrations began in earnest with the establishment of the CAC in 2014, giving local MCAs sufficient time to develop and stabilize their areas of responsibility. Indeed, among MCAs that disclosed their responsibilities consistently over time—such as several in Hebei Province—only minor or no changes were observed (see, for example, Chengde [12]).

Second, the dataset does not provide a comprehensive picture of all MCAs in China. Some MCAs likely treat their areas of responsibility as confidential precisely because they are tasked with significant surveillance functions. If so, their absence may lead to an underestimation of how many MCAs are designed primarily around surveillance. Constructing a complete national dataset is beyond the scope of this study. Nonetheless, this exploratory analysis represents a first step toward more comprehensive future research.

Third, the study relies on the stated areas of responsibility in budget reports to infer the assigned roles of MCAs as developmental, regulatory, or surveillance actors. This method does not capture their actual behavior or policy implementation. Ideally, richer data—such as annual activity records, policy outputs, resource allocation, or policy outcomes—would provide a fuller picture, but such information is extremely difficult to obtain given the institutional opacity of MCAs [16, 57]. Still, despite this limitation, identifying formally assigned roles offers an important entry point for future research to examine how, and to what extent, these roles are enacted in practice.

## Operationalization of the Three State Frameworks

Based on the definitions of the developmental, regulatory, and surveillance state, and on a preliminary analysis of the areas of responsibility in the MCAs' budget reports, this study operationalizes the three state frameworks into the following roles:

- An MCA is assigned a developmental state role if its areas of responsibility include tasks related to economic or technological advancement, such as supporting the growth of local digital economies or fostering cybersecurity technologies and industries.
- An MCA is assigned a regulatory state role if its areas of responsibility involve market or social regulation, for instance, overseeing the cybersecurity or internet industries, or managing illegal online content such as pornography or trafficking.
- An MCA is assigned a surveillance state role if its areas of responsibility center on maintaining the CCP's political control, including censoring politically sensitive content, monitoring public opinion, or strengthening party organizations within the internet sector.

The task of an MCA to manage online content is often indicative of both a surveillance state and a regulatory state. This is because the task typically involves, on the one hand, addressing sensitive information deemed risky to the party-state, and on the other, regulating illegal information, such as pornography and violent content, considered harmful to society. For instance, in the *Provisions on Ecological Governance of Network Information Content* [18], the CAC issued detailed rules in Article 6 on prohibited online content. Some categories—such as subverting state power or disturbing social order—clearly serve the goal of maintaining political control. Others—such as disseminating obscenity, pornography, depictions of violence and brutality, or content related to terrorism or extremism—are more oriented toward protecting internet users. The difficulty is that in the areas of responsibility, MCAs often list only “manage online content” without specifying which types. This vagueness is likely a product of “authoritarian legality,” which deliberately relies on ambiguity to strengthen the party-state’s rule [28]. Accordingly, when an MCA’s budget report does not specify the types of online content it manages, this study codes the task as both a surveillance and a regulatory role (see Appendix 1 for further clarification on coding).

The coding was conducted in two stages (see Appendix 1 for an example). First, for each MCA’s description of areas of responsibility, and for each role (developmental state, regulatory state, and surveillance state), if the description mentioned any of the tasks associated with a given role, it was coded as 1; if not, it was coded as 0. For instance, an MCA with all three roles would be coded as 111, whereas one with only a surveillance role would be coded as 001.

In the second stage, this study categorized all tasks under each role into more specific types to clarify what an MCA is tasked with developing, regulating, or surveilling. These task types were identified and summarized based on observations from the first stage of coding. Specifically, when an MCA is assigned a developmental role, it typically focuses on three areas: informatization and cybersecurity technology, the information and internet industry, and financial information services. When an MCA is assigned a regulatory role, it typically oversees five areas: online content (in terms of illegal content), cybersecurity, internet investment and security review, self-regulation of the internet industry, and financial information services. Finally, when an MCA is assigned a surveillance role, it typically addresses four tasks: monitoring online content (in terms of sensitive information), tracking online public opinion, promoting online propaganda, and undertaking party-building within the internet industry.

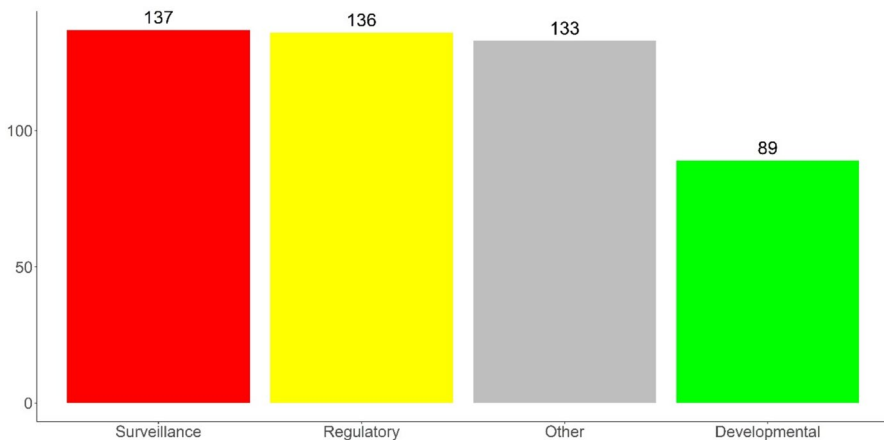
Based on these task types, for each MCA’s description of its areas of responsibility—and for each identified role—the second stage of coding recorded the specific types of tasks associated with that role. For instance, an MCA coded as 011 in the first stage, with no developmental but both regulatory and surveillance roles, might have its regulatory role further specified as focusing on cybersecurity and self-regulation of the internet industry (two of the five regulatory tasks), and its surveillance role as focusing on sensitive online content and online public opinion (two of the four surveillance tasks).

## The Multiple Roles of MCAs in China's Internet Governance

### MCAs as Strong Surveillance and Regulatory Actors

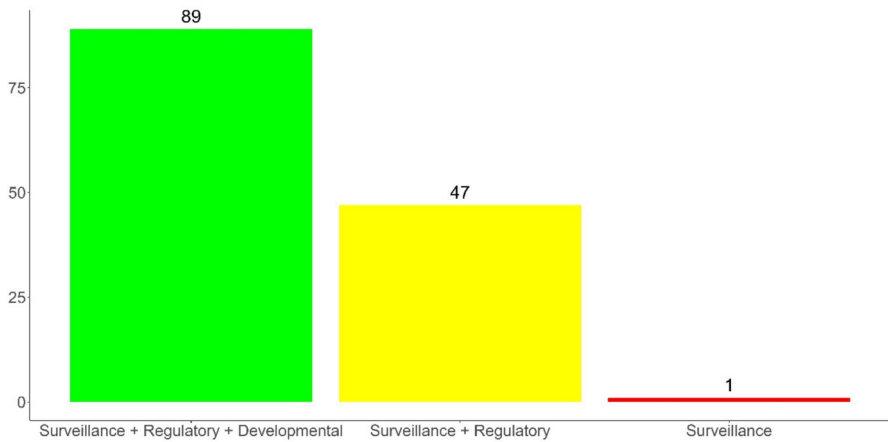
The first step of the analysis examines the overall distribution of the three assigned roles—surveillance, regulatory, and developmental—among the 137 MCAs in the dataset. As shown in Fig. 1, surveillance is the most universally assigned role, appearing in the responsibilities of all 137 MCAs. Regulatory roles follow closely, present in 136 of the 137 MCAs. In contrast, only 89 MCAs list developmental responsibilities. This distribution reflects the hierarchical ordering of state roles discussed earlier, in which surveillance and stability maintenance are prioritized within China's party-centric governance model [69]. The CAC, as the central organ of internet governance, is widely perceived as a strong surveillance actor [1, 13, 14, 47]; it is therefore unsurprising that its local subsidiaries—the MCAs—mirror this prioritization. While regulatory roles are nearly universal and often coexist with surveillance roles, developmental roles appear more selectively assigned and may be contingent on local political-economic contexts.

However, the presence of developmental roles in over 60% of MCAs (89 of 137) suggests that digital development remains a significant, if secondary, goal—even within a system dominated by surveillance imperatives. Rather than treating each role in isolation, Fig. 2 visualizes the combinations of assigned roles across the MCAs, further clarifying this point. Strikingly, only one MCA (Zhengzhou City, Henan Province) is solely tasked with surveillance, while a majority (89 MCAs) are formally assigned all three roles. This finding reinforces the earlier proposition that, although surveillance typically dominates, it does not preclude the inclusion of regulatory and developmental roles. Instead, MCAs are designed as institutional spaces where multiple state roles coexist within an uneven but dynamic hierarchy, reflecting



**Fig. 1** Number of MCAs Assigned Surveillance, Regulatory, or Developmental Roles.

Source: Data compiled by the authors from 137 online MCA budget reports. “Other” denotes tasks beyond the three state roles, typically of a purely administrative nature, such as managing the daily operations of the MCAs or developing their internal organizational capacity



**Fig. 2** Number of MCAs for Different Combinations of the Three Assigned Roles.

Source: Data compiled by the authors from 137 online MCA budget reports

the evolving strategic imperatives of the party-state. This dynamic hierarchical order of the three state roles is further illustrated in the case study of Xianyang presented in a later section.

### The Surveillance Face of MCAs

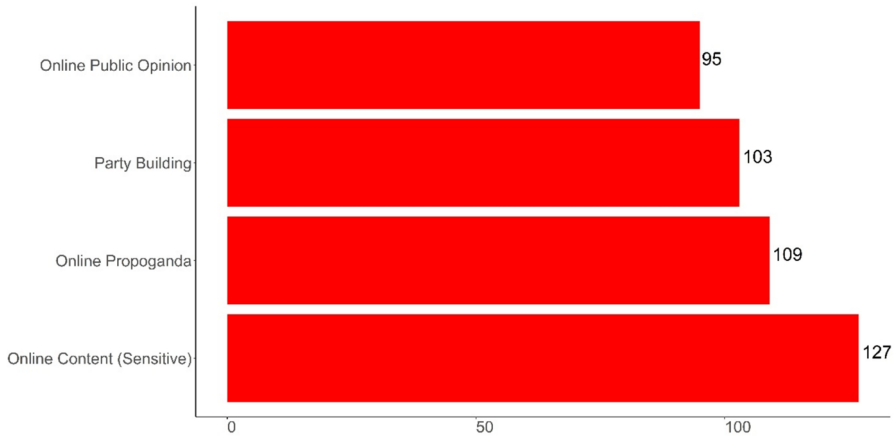
While Figs. 1 and 2 support the common perception among scholars and media that China's cyberspace administrations are strong surveillance actors, they do not provide details on what exactly is being surveilled. Therefore, the second step of the analysis investigates the key focuses of MCAs when assigned a surveillance role.

As Fig. 3 shows, the top priority is online content containing sensitive information, which nearly all MCAs in the dataset (127 of 137) specify in their areas of responsibility. This is unsurprising, as prior research has shown that sensitive information on the internet has long been a focus of China's censorship regime due to its high potential to trigger collective action [44].

Interestingly, if censoring sensitive online content is regarded as a reactive approach to maintaining social stability, then online propaganda can be considered a proactive approach. In the dataset, 109 MCAs identify this task as another priority. This emphasis reflects a natural continuation of the CCP's propaganda efforts, given the close link between cyberspace administrations and the propaganda system [14, 55]. In fact, many MCA employees have prior experience in the propaganda department [1].

Thirdly, building and maintaining strong party organizations within the internet industry is also a key component of the surveillance role, with 103 MCAs listing this as a task. This responsibility appears especially important given President Xi's longstanding focus on strengthening CCP leadership across all sectors in China [9, 23, 86, 87].

Finally, monitoring online public opinion is considered an important surveillance task by a majority of MCAs (95 of 137). Although this task overlaps with censoring sensitive information, it likely requires more advanced techniques and greater capac-

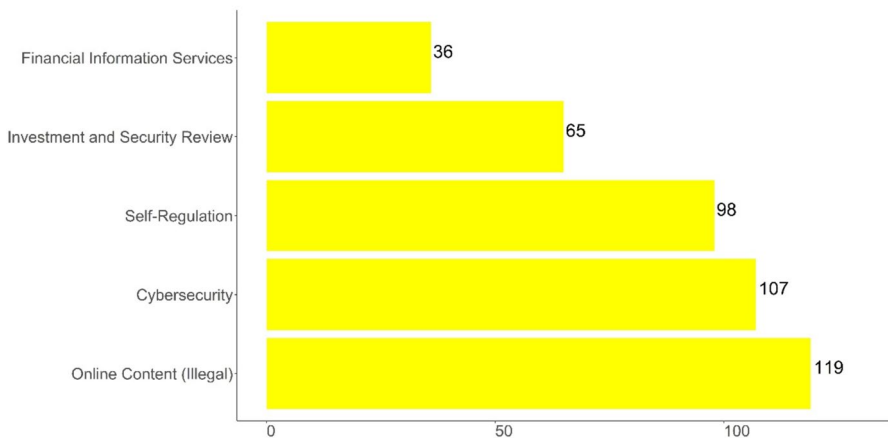


**Fig. 3** Number of MCAs Assigned a Surveillance Role by Focus Area.  
Source: Data compiled by the authors from 137 online MCA budget reports

ity to collect and analyze large volumes of online content. This may explain why not all MCAs are assigned this demanding responsibility.

### The Regulatory Face of MCAs

In general, the regulatory focuses of MCAs show more variations than their surveillance tasks. As Fig. 4 illustrates, the majority of MCAs focus on regulating online illegal content (119 of 136), cybersecurity (107 of 136), and promoting self-regulation within the internet industry (98 of 136). In comparison, fewer than half of the MCAs (65 of 136) have a regulatory focus on internet investment and security review, and even fewer (36 of 136) focus on regulating financial information services.



**Fig. 4** Number of MCAs Assigned a Regulatory Role by Focus Area.  
Source: Data compiled by the authors from 137 online MCA budget reports

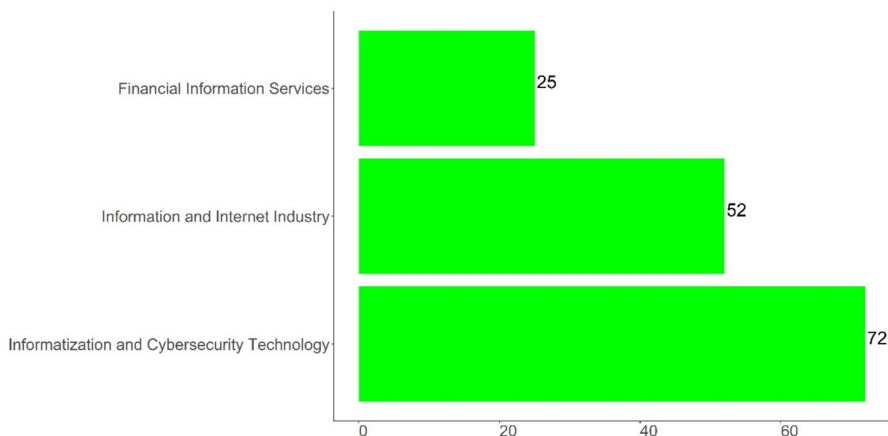
This pattern is understandable, as both internet investment review and the regulation of financial information services presuppose the existence of these industries, which may not be significant in all municipalities. In contrast, the first three regulatory tasks are less dependent on the local level of internet industry development and are therefore more likely to be explicitly specified by the MCAs.

### The Developmental Face of MCAs

The final step of the analysis examines the focus areas of MCAs when assigned a developmental role. Seventy-two of 137 MCAs have duties to coordinate the development of informatization and cybersecurity technologies across sectors and to promote research into advanced technologies and equipment, including measures to facilitate the integration of military and civilian resources.

The information and internet industry is also a priority for many MCAs (52 of 137). Local governments clearly aim to host not only major internet companies such as Alibaba, Tencent, and Didi but also other digital creative industries as key drivers of economic growth [54].

Finally, 25 of 137 MCAs focus on planning and guiding the development of local financial information services. On the one hand, it is notable that a substantial number of MCAs have a strong emphasis on developing local digital economies, demonstrating that economic growth remains a key element of the CCP's performance legitimacy [96]. On the other hand, this focus is somewhat unusual, as responsibility for local digital economic development typically resides with the Industry and Information Department. It will therefore be important to examine how these two departments coordinate in practice to promote local digital economies (Fig. 5).



**Fig. 5** Number of MCAs Assigned a Developmental Role by Focus Area.

Source: Data compiled by the authors from 137 online MCA budget reports

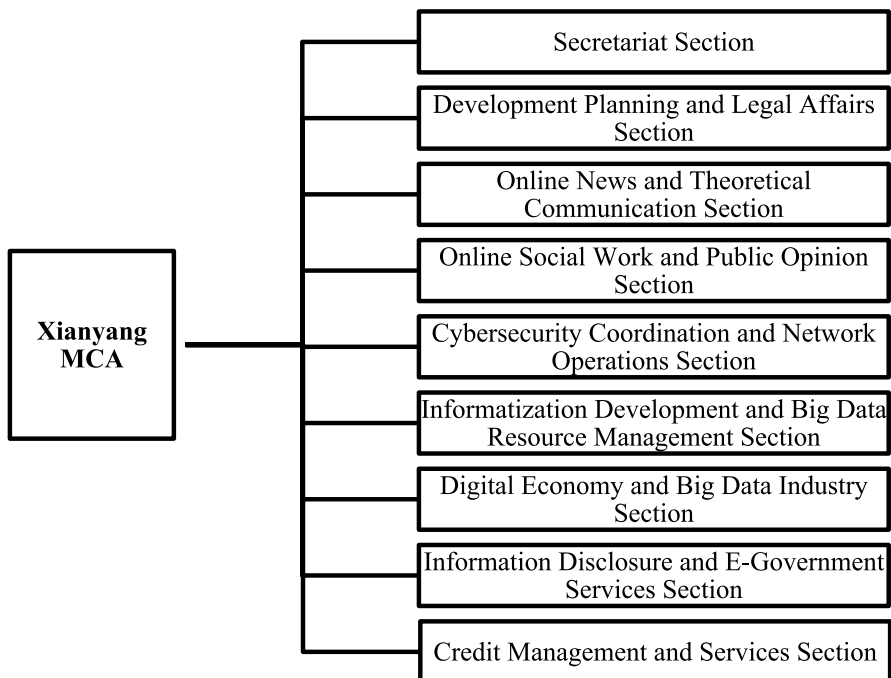
## Applying the Three Roles to Other Institutional Aspects of MCAs

This section extends the application of the three state frameworks—the developmental state, the regulatory state, and the surveillance state—to examine the organizational structure and annual projects of the Xianyang MCA. While earlier sections show how MCAs' roles coexist and are hierarchically arranged at an aggregated level in China's internet governance, this case study provides a concrete example of how these roles are distributed and structured in a local political context.

The Xianyang MCA was selected because it provides unusually detailed disclosures on both organizational structure and annual activities, which are extremely rare among MCAs. Most MCAs either classify such information as confidential or provide only general descriptions. In fact, the Xianyang MCA is the only one in the current dataset to disclose detailed information on its organizational structure.

The internal structure of the Xianyang MCA, as disclosed in its 2020 budget report [81], illustrates how different sections are designed to align with the three state roles. Figure 6 presents the organizational structure, highlighting the allocation of responsibilities across these sections:

- Surveillance role: The Online News and Theoretical Communication Section focuses on online content and propaganda, while the Online Social Work and Public Opinion Section prioritizes party-building and public opinion monitoring.



**Fig. 6** The Organizational Structure of the Xianyang MCA.

Source: Data compiled by the authors from the 2020 budget report of the Xianyang MCA

Both sections are primarily concerned with maintaining social stability, thus embodying the surveillance role.

- **Regulatory role:** The Cybersecurity Coordination and Network Operations Section oversees cybersecurity and network management, functioning as a regulatory entity. The Information Disclosure and E-Government Services Section enforces compliance with digital governance regulations, ensuring governmental transparency requirements are met. Additionally, the Credit and Services Section implements the social credit system, regulating citizens' behavior through monitoring and incentive structures.
- **Developmental role:** Two sections are dedicated to developmental roles: the Informatization Development and Big Data Resource Management Section focuses on advancing informatization within the public sector, while the Digital Economy and Big Data Industry Section targets private-sector growth through digital economy initiatives.

The presence of two developmental sections in Xianyang MCA's structure is particularly noteworthy when compared with other MCAs within Shaanxi Province. The following analyses are based solely on the section titles disclosed by other MCAs, as no further details are available, so this comparison remains preliminary. The Yan'an MCA has a structure similar to Xianyang's [88], suggesting a comparable emphasis on the developmental role, while the Tongchuan MCA also features two developmental sections but lacks a section dedicated to the regulatory role [70], which distinguishes it from Xianyang. In contrast, the Xi'an MCA does not have a section dedicated to digital economies but includes an additional section focused exclusively on monitoring public opinion [80], indicating a greater emphasis on maintaining social stability in larger cities. The Weinan MCA has only three sections—the Secretariat, Online Propaganda, and Cybersecurity and Informatization—indicating the absence of a clear developmental role [78]. Similarly, the Yulin MCA does not appear to include any developmental role in its organizational setup [92]. The Ankang MCA has a relatively streamlined structure with only four sections but manages to cover all three roles: developmental, regulatory, and surveillance [3]. Finally, the Shangluo MCA [67], Hanzhong MCA [30], and Baoji MCA [4] do not disclose any information regarding their internal structure, making comparisons impossible. These comparisons highlight significant regional variation in how MCAs are designed to prioritize developmental, regulatory, and surveillance roles, even within the same province.

The Xianyang MCA's 2021 final account report provides detailed information on its annual projects [82], further demonstrating the coexistence of the three state roles. Unlike previous analyses, these projects show how an MCA actually carries out its roles, with most aligning with the developmental, regulatory, and surveillance roles.

- **Developmental role:** Six projects focused on advancing digitalization, such as building digital platforms for private enterprises and public services. These initiatives reflect a strong developmental focus, potentially driven by the COVID-19 pandemic, which highlighted the importance of digital solutions for economic development and public health management.

- **Regulatory role:** A significant portion of the budget—over 35 million RMB—was allocated to replacing outdated IT infrastructure with systems based on domestic technologies, enhancing cybersecurity. Other regulatory projects included improving digital governance platforms to comply with transparency and accountability requirements.
- **Surveillance role:** Two projects focused on online propaganda, promoting “positive energy” and fostering social stability. The COVID-related digital platform played a dual role: It regulated public behavior during the pandemic and facilitated monitoring to maintain order.

In conclusion, the case of the Xianyang MCA illustrates the coexistence and dynamic hierarchy of developmental, regulatory, and surveillance roles in both institutional design and day-to-day practices. Its internal organizational structure clearly assigns different roles to distinct sections, while its 2021 annual activities demonstrate how these roles are enacted in practice. This reinforces the central claim of this study: Understanding China’s internet governance requires integrating all three state frameworks, rather than examining them in isolation. Notably, the Xianyang MCA appears to invert the commonly assumed hierarchy, as its surveillance role was relatively limited compared to its regulatory and especially developmental roles. This suggests that even within a party-centric model that generally prioritizes political control, surveillance does not always dominate. Instead, the hierarchy of state roles is flexible and context-dependent, shaped by local institutional arrangements and policy priorities.

Nevertheless, the Xianyang MCA should not be seen as representative of all MCAs. Preliminary comparisons with other MCAs in Shaanxi Province reveal significant variation in organizational structures. This underscores the importance of local political dynamics in shaping how MCAs are designed to govern the internet. Future research should therefore expand the empirical scope to determine whether the pattern observed in Xianyang is an outlier or part of a broader trend of differentiated role prioritization across regions (Table 1).

## Discussion and conclusions

Internet governance presents unprecedented challenges for the Chinese party-state, prompting the creation of new institutions to manage this complex domain. Drawing on three well-established frameworks of the state, this study proposes that the Chinese party-state can assign three coexisting and hierarchically arranged roles in internet governance: a developmental role, a regulatory role, and a surveillance/security role. The study then examines MCAs, a key component of China’s internet governance institutions, to understand how they are assigned these roles. Specifically, using descriptions of areas of responsibility from 137 MCAs, the study explores how they define themselves as surveillance actors, regulatory actors, and developmental actors. In addition, a case study of the Xianyang MCA illustrates how the integrated framework can be meaningfully applied to other institutional aspects.

**Table 1** Projects of the Xianyang MCA in 2021

Number	Role	Project Title	Project Focus	Spending (1,000 RMB)
1	Developmental	2021 Digital Economy Expo Participation and Exhibition	Support key enterprises in local digital economies	597.9
2	Developmental	New Smart City Operations and Maintenance Service Project	Infrastructure for informatization and digital cities	6,440.1
3	Developmental	Private Economy Big Data Service Platform Project	Digital platforms for private economies	221.4
4	Developmental	Medical Informatization and Health Card Application Project	Digital platforms for healthcare	5,000.0
5	Developmental	Special Funds of the MCA	Informatization and digital “Xianyang”	3,203.9
6	Developmental	Xixian Transportation Card Operations and Maintenance Service	Digitalization of the transportation card	495.0
7	Regulatory and Surveillance	Digital Pandemic Management and Pandemic SMS Project	Digital platforms for COVID governance	4,413.6
8	Regulatory	Internet-based Government Services Platform Project	Digital government service	2,418.3
9	Regulatory	Xianyang Municipal Government Website Integration Platform (Phase I)	Digital government service	765.0
10	Regulatory	“Satisfaction and Dissatisfaction” Review Project	Digital government service	552.0
11	Regulatory	Xianyang Municipal Party and Government Agencies’ Electronic Document Application System	Using domestic systems and equipment to ensure cybersecurity of the government	35,315.0
12	Regulatory	“12,345” Hotline Upgrade and Renovation Project	Digital government service	1,076.0
13	Surveillance	2021 Online Propaganda Activities	Promote red history of Xianyang	1,744.1
14	Surveillance	Xianyang Party History Learning and Education Quiz Mini-Program	Online propaganda	290.0
15	Other	Utilities, Temporary Staff Wages, and Other Operations	Operational issues of the MCA	4,188.0
16	Other	Big Data Operations Funds	Capacity building of the MCA	398.8

Source: Authors’ compilation based on the final account of the Xianyang MCA (2021)

The findings show that the three state roles coexist, with surveillance generally dominant. Specifically, the MCAs’ primary assigned role remains surveillance, encompassing the censoring of sensitive online content, promotion of party ideology, and monitoring of public opinion. Nevertheless, many MCAs are also designed to emphasize regulation as a critical aspect of their work, alongside development. Among those with developmental responsibilities, the primary focus is on industries related to cybersecurity, informatization, and financial information services. On

the regulatory front, MCAs prioritize addressing illegal online content and ensuring cybersecurity. The case study of the Xianyang MCA provides an important counterpoint, showing that MCAs can vary significantly in role prioritization. In Xianyang, the developmental role is notably more prominent than surveillance, challenging assumptions about the universal dominance of political control. This variation highlights the need to understand internet governance not as a monolithic regime, but as a layered, context-dependent configuration shaped by both central mandates and local imperatives.

Arguably, designing China's party-state apparatuses to assume multiple roles may provide them with considerable flexibility to address the diverse challenges of internet governance. However, this flexibility may come at the cost of accountability. One potential risk is that MCAs could come into conflict with other departments, such as the Industry and Information Bureau or the Finance Bureau, while pursuing various developmental objectives. Consequently, the presence of multiple roles and unclear divisions of labor could make it difficult to determine who is working, shirking, or sabotaging [8], a question that even professional lawyers and prosecutors in China find challenging to answer [71]. Moreover, MCAs may struggle to balance conflicting roles simultaneously. As Huang and Wu [36] demonstrate, local cyberspace administrations often find it difficult to maintain a contingent symbiotic relationship with news start-ups, attempting to support development while retaining control. Similarly, MCAs may encounter comparable dilemmas when tasked with multiple roles that conflict with one another.

In addition, this study underscores the importance of investigating China's local internet governance (see, for example, [36, 40, 49, 50, 83, 94]). In particular, it shows how examining MCAs can provide a more comprehensive understanding of the party-state, moving beyond the common perception of the CAC as solely a surveillance actor. At the same time, it is important to note that the areas of responsibility listed by MCAs may not necessarily reflect their routine activities, given the discretion granted to street-level bureaucrats [56]. Consequently, further micro-level research [65] is needed to explore the attitudes and behaviors of officials within the state apparatus and their impact on those subject to their authority. A recent study of a county-level cyberspace administration illustrates a pronounced focus on online censorship in everyday practices [93]. Such micro-level analysis is crucial for understanding how local cyberspace administrations prioritize and navigate the hierarchical order of competing roles. Equally important are studies examining citizen responses to recent developments in China's internet governance (see, for example, [11, 73, 77, 79, 97]). Taken together, a configurational approach that links macro governance strategies with meso-level institutional designs and logics, as well as micro-level behaviors, has the potential to reveal how these factors interact and shape each other, offering a more systematic and dynamic account of internet governance in China.

What are the implications of China's approach to local internet governance for other countries, particularly in the Global South? While China is often portrayed as a rising techno-authoritarian power with ambitions to extend its model of internet governance [42, 63, 66], a closer analysis shows that its designs and practices are deeply embedded in the unique institutional logic of the party-state. MCAs are simultaneously mandated to censor the internet to maintain social stability, regu-

late China's internet industry and infrastructure, and foster the development of local digital economies, a configuration that derives from China's distinctive institutional arrangements characterized by strong central authority alongside space for local experimentation and competition. Consequently, the observed pattern of coexistence and hierarchically arranged roles in MCAs reflects a form of "Chinese exceptionalism" that cannot be easily replicated outside this specific political context. While certain aspects of China's internet governance may appear attractive to regimes seeking both control over online spaces and growth of digital economies, it is premature—and potentially misleading—to speak of a global normative diffusion of the "China model." Nonetheless, the integrated framework of developmental, regulatory, and surveillance roles can serve as a heuristic for analyzing and understanding internet governance arrangements in other contexts.

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**Data availability** The data that support the findings of this study are available from Yi Ma upon reasonable request.

## Declarations

**Conflict of interest** We have no conflict of interest to declare.

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