



Research article

Media governance: managing online games seen from the perspective of the state in Vietnam

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ABSTRACT

This paper presents a thematic analysis pertaining to the Vietnamese government's role in regulating the country's online game industry. Interviews with administrators who worked for Vietnam's Ministry of Information and Communications were conducted, revealing the perspective and reluctance of the government towards this new socialist-oriented entertainment market in a communist society. The legal framework imposed on online games and its side effects are critically analysed.

Introduction

When one passes by Internet cafés in Hanoi or Ho Chi Minh City, where the lights are on from 8 am to 11 pm, the gatherings of online game players are an unmissable scene. A large number of Vietnamese young men are often seen to be absorbed in their game screens, with some even spending most of the day with their game station and forgoing their eating or sleeping. Viettrack's study (2010) on Vietnamese children's activities uncovered that playing online games was the primary source of amusement for most Vietnamese children. Indeed, the nation had an online population of 55.4 million; among them, 32.8 million are game players (Newzoo, 2017). According to a statistics result provided by Nvidia in 2018, there are 42,000 Internet cafés in Vietnam, granting the country the top 1 position in Southeast Asia in terms of the number of PC seats with around 1.5 million (GameK, 2018). The runner-up, Thailand, has only one-third of that number with 480,000 seats (GameK, 2018). As stated in the report of Newzoo (2019), Vietnam is listed in the top 50 markets by revenues gained from video games, holding the 27th position. This shows that the gaming industry in Vietnam is a promising field in terms of economic development despite its opposition from the press due to its demoralising impacts on young people. As early as 2005, more than 1,000 Vietnamese articles (Minh, 2010) accused online games of being an entertainment format that caused addiction and juvenile delinquencies. Nevertheless, Grubb (2014) anticipated that Vietnam would encounter the biggest surge in the number of gamers in Southeast Asia. Even when interventions from the state are involved, online games have always been popular among

Vietnamese young people. For example, in 2006, the Circular 60 (*Thông tư 60*) was released and limited an individual's playing time to a maximum of 5 h per day. In 2010, the Ban policy limited imported games. In 2013, Decree 72 (*Nghị định 72*) was released with more regulations for online activities. Most recently, in 2018, Decree 27 was promulgated to restrict online games further.

The global game industry has developed in relation to the needs of different local markets. Each market adapts to particular types and genres of games and/or gameplay that represent or reveal the characteristics of the locals and their techno-culture (Hjorth, 2011, p. 103). Collectivity and community play an essential role in shaping these techno-cultures as games are often played in multi-player realms with other online players, yet also have an offline communal dimension when players share the same physical space such as game cafes.

In the case of Vietnam, online gaming in cafes is a dominant practice largely because gaming devices (consoles) are not affordable to an average person (Nút, 2015). Another factor is that although the Vietnamese market has authorised resellers/retailers of branded companies to manufacture gaming console devices, their price tags tend to be at least 20% higher (Nút, 2015) than those bought through unofficial channels. Therefore players, even if they could afford it, may not want to acquire a device legally and instead obtain it through a marginal path. For example, they could make purchases from overseas sources or gaming shops which import devices unofficially. Then they have to pay an additional cost to cover hacking tricks that will help to activate the games to make it playable in a country where branded games try to break into the mass market. Such obstacles that prevent players from owning

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gaming consoles have shaped online games' growth in Vietnam. Online gaming in Vietnam has become a prevalent everyday life entertainment form that reflects globalisation, transnational cultural practices, as well as localisation and appropriation. Additionally, online games have brought transnationalized media experiences to Vietnam. Game players invest their cultural values into the gaming environment and perform trans-border communication. Distributors strive to localise foreign products, forming transnational enterprises with new models of business applied (such as free to play or pay to play). Meanwhile, the state seeks an effective method to keep such transnationalization processes under control. In light of the various stakeholders and processes that are taking place, the aim of this paper is to provide an answer to the research question: How do Vietnamese administrative bodies (as the regulator) participate in and react to this new entertainment format?

The objective of this research is to contribute to the literature of Game Studies, in which Southeast Asia has not been fully explored. In the context of technology in general and video games particularly, East Asian countries have been seen as the epicentre of the industry while other regions and countries (Southeast Asia, to be specific) are not paid adequate attention. This fact could be retrieved from the concept of techno-orientalism, a term coined by Morley and Robins (1995) that was derived from the concept of Orientalism of Edward Said (1978) to describe a system of stereotypes about Asia in terms of technology. In the past, the condescendence found in the core of Western orientalist's mindset made the East be grasped as an uncivilised world that consists of irrational, depraved (fallen), childlike, and different values (Said, 1978, p. 40). However, the modern technological environment has changed this concept to the extent that the new concept- techno-orientalism, must be understood in the other way around. It has become a term, then an excuse used by the West to preserve its identity in the rapidly evolving era of the information age, which combines the iconic imagery of the exotic East with futuristic, science-fictionesque imagery and narratives. This new version of orientalism recruited Japan as its centre since the rise of this nation from the 80s in terms of economic success has made Japan become a powerhouse. Thus, the West needs to act to prevent Japan from dominating the global economy, trying to preserve its identity by forging a concept that heavily focuses on one country. Nonetheless, the Asian rise in terms of technology is not a single-player game of Japan since the reality has revealed that China, South Korea, and Southeast Asian countries have also tried to catch the attention of the West through their endeavours and achievements in various technological fields. Farrelly (2018) noted that the understanding of Southeast Asia has been extended thanks to the increasing wealth, connectivity, and interaction within societies and across the region. The colonial stereotypes that Southeast Asia is weak and requires charity no longer match local realities or ambitions; thus, a shift of focus to conduct more research on Southeast Asian countries is reasonable. Indeed, it is already an academic trend since World War II (Farrelly, 2018). Therefore, this study expects to keep holding up this research tradition by touching upon the aspect of digital leisure, which is also an effort to help readers know more about the technological interface of Asia through a non-East Asian example.

Additionally, this research tries to tackle the current passivity of Southeast Asian Studies in general and Vietnamese Studies in particular. Farrelly (2018) commented that scholars whose interest is Southeast Asia are facing a criticism that they have not been intellectually reinvented or theoretically reinvested in the process of area studies knowledge production with the creative energies. The traditional, yet partially obsolete way of examining Southeast Asia is through excessively analysing the linguistic and cultural foundation in the pre-colonial and colonial periods of this region. The post-colonial period has been dissected through emphasizing several trending topics, including the economy and ASEAN, the action and inaction of governments, ethnic groups and their customs, and religions. Farrelly (2018) mentioned that artificial intelligence, automation, machine learning, and so much more, would shift the Southeast Asian landscape in unimaginable ways. Southeast Asian Studies scholars cannot let their hands tied by keep focusing on topics

that seem to be up to the level of saturation. Vietnamese Studies analysts cannot stop at their imagined red light and keep their vision not farther than the mainstream themes of the Vietnam War, the communist party, and the Vietnamese diaspora. Thus, through analysing online games, this study would serve to recognise and construct the political identity of Southeast Asia in general and Vietnam in particular with a more creative method.

The role of the state

The reason why the government should be taken into account when trying to capture the panorama of Vietnam's online gaming industry lies in the stakeholder conceptualisation that connects the state with the business-society interface, which is a theory that arose in the 80s. Dahan et al. (2015) stated that for the last four decades, research on the role of the government has granted this body two positions: the state is either typically seen as a non-stakeholder who pulls strings from the background, or merely a stakeholder among several other stakeholders who might be treated equally. The unique rank of the government, thus, has not been properly placed and the nexus between the business, the society and the legislators, has also been underexplored. According to Reich (2009), this view of governments must be challenged since the economic crisis in 2008 had brought up issues that needed the involvement of the state in coordinating the economy, not only at the national level but also on the global scale. Morrar et al. (2017) also stressed that recently trending topics named the fourth industrial revolution (the Revolution 4.0) with its embedded diffusion of the technology adoption and the advancement of innovations, including the expansion of network services and the exponential growth of artificial intelligence. In order to assure that this development is not a misconception or only a temporary leap, the governance of the state deserves our research attention.

Dahan et al. (2015) commented that the new position of the government in the current situation is a synthesis of four roles. As a non-stakeholder, the government is in charge of building and maintaining a stable framework, drawing a red line of legislation that other bodies cannot cross. The existence of a legal structure which can objectively navigate the economy is pivotal since other stakeholders may want to break the law when a benefit is great to the extent that their resistance against that charisma is futile. Indeed, that blindfolded pursuit of benefits needs to be alerted by a whistle-blower before any implausible decision-making could be made. By preserving a fair nature for the competition among business, guaranteeing the human rights, respecting and protecting the agreements made between stakeholders, the government ensures that the economy has its back watched by justice. As noted by Heath and Norman (2004), the totality of justice can only be upheld when the government stands outside the playground of stakeholders and does not have any conflicts of interests that may cloud the judgement. Simultaneously, the government also needs to play the role of the interfering force through the implementation of public policies. Buchholz and Rosenthal (2004) asserted that the government must play the role of a third-party referee who can figure out what the general interest of all other stakeholders is in order to eradicate the conflicts given birth by the social demands of these stakeholders. Sometimes, these interventions are not only limited within dispatching suitable policies, but fines and penalties are also required to keep the balance and save the economy from potential failure or damage created by the contradictions.

As a stakeholder, the government complies with the traditional model of the stakeholder theory coined by Freeman (1984) in which the business stands in the focal position while the government is one of the other stakeholders. The problem of this role depends on how the managers of the business treat the government since the idea of equal treatment is inefficacious. The satisfaction that a business can provide to all stakeholders can only make sense on the basis that these stakeholders' expectation is fully compatible with each other (Freeman, 1984). Nonetheless, the reality tends to show that incompatibility seems to be regular and thus, to which stakeholder the priority should be given is

always an equation that takes time to solve. The government can or cannot receive any privilege depending on the case that we look at. Assuming that the government plays the role of a client who acknowledges his full benefits, rights, and obligations, it is not a strange scenario if the state cannot avail of special treatment in the case that the business cannot adequately fulfil some requests such as pricing or supplying a specific product that the business does not want to stock in (Dahan et al., 2015). When it comes to the idea of a mutual benefit, the possibility for the business to compromise is not always an inherent option. This statement is more explicit if the role of the business even prevails the rank of the government in a locality where a corporation is a major force operating the community and offering most jobs to the local people. Dahan et al. (2015) also pointed out that for developing countries where the government urgently needs the flow of foreign currency to nurture the domestic economy, the manipulation comes from a major business is foreseeable, proving that the central position of the business in the traditional model of stakeholder theory is reasonable.

The fourth role that can be played by the government if it is considered a stakeholder is the role of an advocate for other involving parties (Friedman and Miles, 2002). This scenario captures a bigger picture by showing that when it comes to an economic issue at the regional level and above, there might be more than one public authority that participates in the operational process. As a matter of fact, different authorities would employ variegated approaches and support dissimilar ways of implementing the policies. In a specific situation where one government might play a grandiose role while no other involving authorities can voice out confidently, the invitation of another government to act as the advocate for other stakeholders is the most welcomed outcome. The new proposed model would sketch out that the ultimate government who plays the decision-maker role will seize the central position while the advocate government is the representative stakeholder who tries to influence the decision-making process of the supreme government. In reality, the advocate role could be played by an alliance of governments instead of a sole state (e.g. ASEAN when one of its member countries has to deal with China). Another variation is that the government plays the advocate role to protect a local company. When that company gets involved in a situation which may affect the stability of the national economy, or where the position of that specific company in the local market is too critical, or that company is a state-owned unit, the business is lawyered up with the government playing the barrister role.

The role of the government in the Vietnamese context is unique since this country employs the communist ideology and the concept of a socialist market economy, which resembles the model adopted by China. Although the open-minded economic model deployed in Vietnam after Đổi Mới in 1986 has shown more tolerance towards the participation of the private sector and the presence of foreign investors, the central role of the state represented by the power of state-owned corporations and its state-centred controlling scheme reflected through the policies that scrutinise the expansion of the domestic economy, are still prevalent. The intervention of the government to the online gaming industry in Vietnam, thus, is conspicuous, especially when the source of most online games is China who holds a dual role of a partner-nemesis of the country.

In this study, the role and the attitude showcased by the state are set within the context of media governance. Puppis (2010) indicated that when discussing the concept of regulatory reform, scholars usually distinguish between narrow and broad definitions of governance. From a narrow approach, governance refers to a sequence of changes, including the changed condition of polities, politics, and policies, thus signifying a new way by which the society is governed. In this narrow sense, governance is understood as forms of regulations; and the focus is set on public and private sectors that engage with the policy formulation, while the government as the statutory institution is not included in the scope of governance (Puppis, 2010). The broader sense, in contrast, provides a more holistic way of approach, in which governance is seen as a collective endeavour that requires the involvement of a wide variety of actors with different purposes and objectives, including political actors and

institutions, as well as non-state actors such as corporate interests, civil society, and transnational organizations. In this view, the state is seen as a built-in component, and the idea of governance is not realised beyond the state. Instead, as mentioned above, it should be seen as a corporative effort with the participation of various actors operating at different levels and modes (Puppis, 2010). This research complies with the broader sense of governance and recognises the importance of other non-state agencies. Nonetheless, within the scale of this study, the focus is put on the state. As Puppis (2010) noted, the state remains vital despite the emergence of non-statutory forms of regulation, and its role is not rendered obsolete.

Research method

The deployment of a qualitative approach is a crucial feature of this research's methodology since it could help extract the personal experiences about online gaming of the state's officers (how they regulated online games, emerging issues from the administrative perspective, etc.). The information gathered in this qualitative study incorporates both verbal expression and several non-verbal manifestations such as emotion, nuances of sentiment, gestures, vocal (tone, volume) and outward appearances, to name but a few (Lindlof and Taylor, 2011). Collected data including interview transcripts, observatory notes, a wide assortment of records and chronological reports and memoranda were dissected thoroughly.

Since this paper includes opinions and ideas about transnational experiences with online gaming seen through the lens of governmental bodies, a chain of elite interviews was employed. The procedure consists of highly specific data provided by highly ranked officers who hold authority and influence in institutions or enterprises (Boucher, 2017). The ultimate goals that researchers have when conducting elite interviews could be divided into three forms (Goldstein, 2002): retrieving information from a group of officials in order to understand their characteristics or decisions; discovering a particular piece of information that was not (supposed to be) revealed or getting hold of a particular document (especially when the document are not meant to be publicly accessed), and informing or guiding work that uses other sources of data. According to Tansey (2006, pp. 4–6), the rationale behind this selection could be categorised into four groups. Firstly, using elite interviews could help validate what has been built up from other existing sources. The objective of gathering such information is frequently to affirm data gathered from different sources since the voice of the elite is usually the official one. Secondly, it also assists in setting up an arrangement of individuals thinking and giving new data that will enhance the examination process. Thirdly, it helps make deductions from a bigger populace's attributes and choices. This type of interview can likewise be utilised not just to assemble new information about the mind-set or activities of particular people, but additionally with the end goal of making inductions about the convictions or activities of a more extensive gathering who are not themselves interviewed for the research. Fourthly, it is supposed to reproduce an occasion or set of events as well as to help understand the behind-the-scenes operational procedure since the elite usually plays the role of organisers or controllers.

Conducting an interview is a useful technique for gathering information from political and business elites since it takes into consideration rich and top to bottom discussions (Darbi and Hall, 2014). Within the context of this research where viewpoints of officials in governmental bodies play an important role in forming the governing manner towards online gaming in Vietnam, this level of detail is vital since it considers how administrative points of view have moulded the association. Still, this erudite type of conversation posed challenges such as boundaries to gain access, lopsided nature in the power connection between the specialist and the respondent, and the possibility of showing hesitance from the respondent to talk straightforwardly (Drew, 2014). Besides, getting elite people to come on board and agree to join a long-run interview was indeed a challenge. Kenneth Goldstein (2002) even stressed that a seem-to-be-ready and professional analyst who would be

capable of managing an open-ended interview that covers a wide range of topics, while establishing a strong connection with an elite interviewee would never get the opportunity to show his skills in navigating the conversation if the meeting could never be arranged.

After getting the approval from the Internal Review Board of the National University of Singapore (NUS-IRB), the author arranged a focus group of 4 participants who worked for the Ministry of Information and Communications (*Bộ Thông tin và Truyền thông*) and at agencies that directly managed online games. Their ages ranged from 25 to 46 with one female and three males. In order to keep their identity protected, they will be called and numbered based on their status: Admin 1, Admin 2, etc., to be specific. The reason why there were only four respondents is that after the 400-million-USD-valued online betting ring under the form of online card games with the involvement of many high-ranking officers of the Ministry, the Department of Police and several well-known entrepreneurs in Vietnam was busted out in 2018, officers of the Ministry have showcased an attitude of hesitation when online games are mentioned. Since this scandal is still under further investigation, this thought is understandable. However, simultaneously, it also helps uncover another facet of governance philosophy of the state that relates to online gambling, which is considered the dark side of online gaming.

All meetings were tape-recorded or noted (in the case that they did not want to be recorded) and lasted from 45 min to 2 h with several follow-up interviews of the same duration. The meetings were arranged informally, conducted in Vietnamese and were translated and transcribed into English simultaneously. Field notes and observations were also taken.

An approach that utilised open-ended inquiries was set to enable the respondents to participate in boundless talks. One of the principal goals was to get at the logical subtlety of reaction to make sense of the thinking and premises that underlay it. Therefore, a semi-structured interview was conducted in which the open-ended inquiries gave the respondents the scope to express their reactions completely. This required careful consideration from me since such a meeting would have a more conversational quality than that of a typical organised, closed-ended meeting in the setting of Vietnamese administrative bodies. Another advantage that an open-ended, casual-like approach had over a closed-ended inquiries style: the receptivity of respondents. [Aberbach and Rockman \(2002\)](#) suggested that elites and particularly other exceptionally intellectuals tend not to prefer close-ended inquiries since they want to voice out their perspectives, clarifying why they thought and decided that precise way.

The interview guide, except two warm-up questions to get demographic data, was divided into seven questions, each was also followed by 2–5 follow-up probes. Instead of using the qualitative data analysis software like NVivo or MaxQDA, the responses were manually coded, categorised and analysed since the number of respondents was a manageable size. Besides, some of the key points would benefit from being kept in Vietnamese rather than being translated into English, which might introduce unnecessary coding complications in analysis software.

Besides, in order to acquire an insight into the telecommunication policies released to manage online games in Vietnam that help display the political and legislative attitude of the state, an extensive documentary review using close reading and textual analysis of all decrees, circulars, and resolutions that are related to online gaming was also conducted. These documents could be retrieved from the National Library of Vietnam via open access since they were published in the official gazette of the government and also posted on the official website of the Ministry.

Results

Although the interviewees are under 45 years old and did not directly participate in the process of introducing the Internet or online games to

Vietnam, all four admins agreed that developing technology-related regulations by learning and exchanging experiences with foreign countries, and utilising innovations to help Vietnam catch up with other developed countries were policies that the Communist Party and the government focused on right after the start of the Reform (*Đổi Mới*) in 1986, despite challenges from the embargo set by the US until 1995. In this direction, Internet services were made accessible to the public in Vietnam 11 years after the Reform. It is noteworthy that the public access to the Internet was made available in other more developed countries in Asia such as Japan, China, Indonesia, Singapore, or Malaysia during 1991–1996 ([Chon, 2015](#)). This means that Vietnam - a country that recently exited the war, had the border conflict with China, and suffered from the embargo of the US altogether - was only one year later than those nations in adopting the Internet:

It was such a pity that we did not belong to the generation that made the Internet come true, but that was an incredibly great achievement that no one can deny. If there were no Internet, I cannot imagine what the current life would become. No Facebook, maybe (laugh). (Admin 3)

Overview of the industry

When asked to evaluate and comment on the current condition of the online game industry, Admin 2, who is a high-ranked officer of the Authority of Broadcasting and Electronic Information (*Cục Phát thanh, truyền hình và thông tin điện tử*) that issued the operating license to Vietnamese companies, asserted that the amusement industry in Vietnam was emerging and posed various promising opportunities to the Vietnam market. Still, from a management perspective, this digital entertainment format was also a challenge:

Things that are related to the media platforms and especially the Internet always bring issues to challenge the management capability of Vietnamese authorities. Online games are not an exception.

Admin 1, who is a younger specialist working in the Ministry for six years, brought in a more positive view on the expansion of online games in Vietnam. He stated that if the motion picture was considered the seventh art of humans, video games were number 8 that stood right behind, and he concurred with that idea, although it might be a controversial statement. In terms of business, he asserted that while tourism has been considered a “smokeless” industry for years that significantly contributed to the gross domestic product of the country, the service section could be expanded with the booming online game industry that not only generated money but also solved another critical issue: hiring and training a huge number of labours that possessed high skills in technology, and simultaneously provided jobs to low-skilled labours who worked for related fields such as opening and operating small Internet cafés or supplying foods and beverages to these Internet access spots, for example.

Admin 3, who is female, admitted that she was not really into games, and added that her comment was mostly based on her administrative perspective. She indicated that although online games only had a history of more than ten years in Vietnam and had to find its way in a situation where both companies and administrators were still learning how to deal with it properly, the rise of online games was natural as the policy of the state would welcome new businesses that could generate benefits for the country without violating the law. She declared that game companies in Vietnam had a good sense of customers' interests; as a result, they rapidly formed and maintained partnerships with foreign companies in China, Korea, or Taiwan to import trending games and distribute them in the local market. She noted that a huge population of nearly 100 million people with mostly young people should be considered the advantage of Vietnam since the country could provide a great source of customers. Nonetheless, she confirmed that issues risen from this industry were unavoidable:

Any industries have pros and cons. We have had to deal with opinions that support the development of this industry, but objections even outnumber the complimentary. [...] but the presence of addicted players who are capable of commit some misdemeanours or even crimes is true, and the authority has to make sure that everything must be within the manageable size.

The viewpoint of the authority on the necessity of a management framework

When these admins were probed about the attitude of the state towards online games, they all agreed that online games required close monitoring. Admin 4, who works for the Vietnam Recreational eSports Association (VIRESA), said that the reason why online games had to be placed within the radar of the authority was for the benefits of players themselves. As Vietnamese players were mostly young people, they possessed naïve and limited perceptions that might lure them to unforeseeable troubles, harming them physically and mentally.

They could be tricked by other players, or they get addicted to games. The rebellion of young age may cloud their vision to see which danger is out there.

Admin 2 showed a more pro-politics viewpoint by asserting that since online games provided a platform where information and content could be transferred and exchanged, close surveillance was needed to protect the national security by preventing the circulation of false information that might alter or intentionally abominate policies of the state. Besides, it also ensured safety by guaranteeing that players would not be exposed to unsuitable content like brutality or nudity. Another point by Admin 2 was that one of the functions of the state was to ensure a safe and fair environment for business to flourish, thus good management of online games aimed to demonstrate to game companies that their backs were closely watched, their rights were protected, and their requests were considered.

Admin 3 added that there was no doubt that the Vietnamese government has paid attention to the establishment and development of online games in Vietnam, which led to the creation of administrative bodies that were specifically in charge of managing this domain. Although she confidently confirmed that the authority always kept track of the expansion of the industry and promulgated adequate and effective policies, she also admitted some policies were no longer applicable to the Vietnamese market.

The shortcomings of the policies

Admin 1 shared the same sentiments with Admin 3 when stating the authority had acknowledged that some of the released policies had shown shortcomings. These shortcomings did not help the administrative body to govern effectively, and even slowed down the progress of companies. On the one hand, the rights and benefits of companies were directly affected; on the other hand, players, as customers, might have to face some unexpected difficulties in accessing the entertainment format that they did pay for their use. Nonetheless, he added that concomitant changes had been made towards new policies that filled the gap left by previous policies. The formation of these new policies took time in order to make sure that all concerns could be considered, and that is a good sign hinting at a democratic structure that allows other voices to be heard by the state:

We hosted many dialogues between enterprises and the authorities to make sure we could see what they want, what they need, how we can help, and how the assistance will be shaped. We are willing to hear alternative opinions if they could help improve the conditions. (Admin 1)

Admin 2 also agreed that a complete and more credible legal framework was not a problem that could be solved within one day or two. He said people from the outside might think that the authorities in Vietnam got confused or did not know how to compile a new workable

policy. Still, the truth from his viewpoint was that the legal framework to manage online games had been updated on the basis that a core policy was released first; and then several circulars would be released later, playing the role of guidance to guide officers of sub-units in applying the core regulation properly. The advantage of having follow-up circulars was that after a period that the core regulation was applied, issues found in the contents of the regulations, or some feedbacks received from companies would be available; thus, the circulars would help rectify any issues by adding appropriate amendments. However, when I posed follow-up questions on why the authority needed to wait for three years (in the case of Circular 60), seven years (in the case of Decree 72), or five years (in the case of Decree 27), and even banned games for three years for the reason that a new policy needed to be prepared; and whether the authority felt that three or seven years were too long compared to the development velocity of technologies, the interviewees said that the process of reforming administrative procedure still needed to be thoroughly carried out in upcoming years to solve these delays.

These admins also acknowledged that the connection between enterprises and the state had not been as close as expected. Admin 4 explained that this fact was understandable since the goal of companies was to increase profits, while the state needed to ensure the country's economic and political stability, and these two lines did not necessarily cross each other. Admin 2 admitted that in meetings or conferences, or even behind the back of the authority, companies stood up and complained that their business had been jammed, or even had to shut down because the state did not support them effectively, especially when the ban policy pushed them to the dead-end that they had to run games illegally. Although Admin 2 defended that they still issued special licences to games that were evaluated as gamers for educational purposes, the loopholes in the managing process had allowed the abusive expansion of illegal games. Admin 1 labelled that phenomenon as a “*distinctive issue of the Vietnamese market*” but did not offer suggestions on how to obliterate these games. Admin 3 also expressed that Vietnam has “*particular conditions*” that for “*some reasons*”, several medium and small-sized companies publicly operated without a license.

The presence of Chinese game companies who ran illegal servers was also mentioned by Admin 1. He stated that normally, the intervention of the state was manifested through the dispatch of policies; in tough cases, fines or revocation of licences were exemplary punishments. However, the revocation procedure had not been described in details; therefore, fines were mostly used to discourage the illegal operation of online games in cases that involved Chinese companies. The amount of these fines was generally small compared to the benefits they gained, and thus, this form of penalty did not deter them from keep violating the law in Vietnam:

10, 20 or even 50 million VND is not a big deal to them. They might hide in the shadow for a while, waiting for the atmosphere to cool down, then they operate another game. Producing games in China can be done in a quick manner since they got everything they need, so the resurrection of these companies is like mushrooms after the rain.

Online gambling

Admin 2 asserted that card games or board games that might involve the trading activities of tokens that represented equivalent values to real money was prohibited in Vietnam. Nonetheless, he had to admit that the expansion of this genre as online browser games and mobile games was easily observable. He declared that in terms of mobile games, Vietnamese authorities had worked very closely with Google and Apple in order to make sure that no gambling games could be provided to the Vietnamese market. Card games, board games or betting games that used play or fictive money that could not be exchanged for real money were granted permission, but games that “*convince players to top up with real money*”

were not supported and would be reported to the app stores to be removed since they violated the anti-gambling law of Vietnam.

Nonetheless, Admin 1 offered his opinion that card games or board games were trending products that small studios in Vietnam chose to produce since the producing cost was cheap, the interface did not require much dexterity, while the benefits received from these game could guarantee the continuance of the studio. Since 2013, the authority did not grant the license to games that simulated gambling activities; thus, big companies did not enter this section, leaving the market share to small studios. The tricky point was that small studios declared that the value of in-game token was not the same as the amount of money that players top-up, for example, players could pay 20,000 VND (1.2 SGD) to buy a stack of chips with the in-game value equal to 100,000 VND. Since illegal games had not been eradicated and the fines were not seriously perceived, the availability of these games had challenged the management process.

Admin 4 added that for some well-known sites that provided online gambling activities, the Vietnamese government blocked the payment via credit cards and top-up methods through online banking. However, Vietnamese players still found other ways to top-up their account by using agents or digital wallets:

They cannot use VISA or Mastercard, or any local bank accounts to top up. But it does not mean that they do not know another way around. They still can ask an agent who has a foreign bank account to top up for them or use digital wallet services like Entropay or Skrill to bypass.

It is intriguing to note that although the government did not allow the money to go through, the connection to these websites or software was not blocked, and no firewalls to prevent players from accessing these websites was formally set. Unlike another Southeast Asia country who had a strict protocol in dealing with gambling activities by blocking all connections (such as Singapore), Vietnam arguably still had a more tolerant system. Admin 2 commented it could be that the Department of Cybersecurity (*Cục An ninh mạng và phòng, chống tội phạm sử dụng công nghệ cao*) had not solved this issue completely, but it did not mean that intense interventions would not be provided in the future.

Admin 4, nonetheless, provided another perspective that since the authority had granted an operating license to poker clubs in Vietnam, entailing the rise of many clubs in big cities; and the National Assembly had also been discussing the possibility of releasing a new law that allowed and regulated the sport betting activities within a manageable scale, gambling games might be tolerated in the future:

The state can regulate how much per day that they can top up and play, and players also need to prove that they are eligible to play by assuring that their monthly average income can cover the amount used for gambling. This thing was discussed before. It takes time to draft this law, but I think it will be the likely scenario.

The support granted to the industry

The privilege that Vietnamese enterprises wanted to receive from the state was the tax incentives. Although leaders of companies did not reveal the tax rate applied to their company income tax since it was confidential information, I was able to access the estimated numbers through checking the tax law of Vietnam and annual financial reports of companies that were made public. According to these sources, the tax rate applied to Vietnamese companies was about 20%.

Admin 2 shared that the Vietnamese state promulgated several policies that alleviated the pressure put on the tax liability of Vietnamese companies specialising in technology and telecommunications. In the first five years after their establishment, the tax incentives would be applied on a case-by-case basis with the rate reduction from 20% to 15%, 10%, 5%; or the tax could even be waived for the first two years if the company could file the request and their potential in contributing to the

development of the domestic economy could be displayed in their application.

Admin 3 also noted that there was one pro-market policy that seemed to be ignored by companies. Arguably, it was not because the authority did not support them, but sometimes Vietnamese companies did not conduct thorough research on information about the benefits that they were entitled to:

There is a policy regulating that 10% of the company income could be untaxable if that portion could be reinvested to carry out Research and Development (R&D). Nonetheless, most companies seem to neglect this policy.

Tia Sáng (2012) pointed out that typical Vietnamese companies that operate in the field of information technology could use up to 80% of their revenues for R&D. That means if the companies can save an untaxable amount of 10% of their income, this would be a bonus point that should not be missed.

Nonetheless, Admin 1 stated that tax was only a part of the story. In order to smoothen the development trajectory of this industry, law incentives would be more critical and demanded by the companies:

In meetings that we had with companies, they mostly asked for changes in the legal structure that would allow them to import or export games more easily, to receive the license more quickly, while big companies asked for our help to get rid of illegal games that were seizing their market share, etc. We need more meetings to get a consensus between two sides, but I think that they are inclined towards a more lenient legal framework.

Discussions

Although informatics is considered one of the four pillars that helps recover and encourage the economic development of Vietnam, a *laissez-faire* approach is definitely not on the state's agenda. The supervision of the government over the telecommunications industry in Vietnam started with a monopoly model. However, it soon showed to be a failure since the bureaucracy only slowed down the progress of adopting new technologies. That situation was explained by Christine Ngoc Ngo (2017). She argued that with the advent of new technologies, the national security must be prioritised, which leads to a dogmatic dilemma: Should the country adopt this technology or not? Will there be more challenges with the ineffective management found in state-own corporations that can push back the industry? Her proposed solution was to apply the open market economy model with some core ideas that China already used when dealing with the industry. According to Yeo and Painter (2011), two main features could be found in the doctrine of management applied to the telecommunications industry in both Vietnam and China. First, the telecommunications regulators in both countries are under the influencing zone of the party-state. In that sense, they are parts of government ministries under the strong rein of the prime minister or other upper regulatory institutions. Second, although privatisation is not declared prohibited or limited, the governments try to tighten the control over the ownership by introducing a local version of privatisation under the form of corporatisation or equitisation in order to make sure that the state could own the greater share, cementing the idea that the state remains involved in this sensitive industry even when the legitimacy of foreign investors is confirmed. Yeo and Painter (2011) asserted that instead of activating the process of privatisation by assuring that all involving parties regardless of their status (private sector or foreign investor) can have the chance to buy the share, the idea of equitisation in Vietnam or China masks the real intention of the state: maintaining their leading role since the majority of share belongs to the state.

The administrative delay, the confusion that administrators have had, and the incompleteness found in the content of the dispatched policies are results of the aforementioned socialist-oriented economy model led by an authoritarian political regime which has been recorded by many

scholars (Yeo and Painter, 2011). The controversial model of a social market economy was a concept born out of the process of renovation since 1986, which was triggered by the failure of replicating the model of China and the Soviet Union. However, Vietnam did not merely copy models from those two alpha-communist countries; for example, the Vietnamese authorities did not fully adopt the Maoist model of collectivisation in light of its disastrous impacts in China. According to [Đặng \(2009\)](#), Vietnam seems to share more similarity with the reform trait of China since these two countries remained steadfast in conducting the renovation under the leadership of the communist party. In the Soviet Union, the role of the communist party in governing this process was weaker due to the political crisis in the 1980s that eventually led to the collapse of the Union. Vietnam recruited the Chinese model in diversifying economic sectors by adding the private sector, allowing and calling for foreign investments, and encouraging exports ([Đặng, 2009](#)). However, [Lê and Liu \(2002\)](#) stated that certain similarities could still be detected as the two countries needed the same remedy to cure a ruined Soviet Union-based structure.

The major difference was that Vietnam conducted the reform eight years later than China. During the gap time between two countries' renovation, it was a tense period that led to the China-Vietnam border war in 1979; thus, the idea of total replication could not have been possible. Besides, [Đặng \(2009\)](#) also asserted that the most striking feature was that China applied the "top-down" model in which the central state was the one that initialised the process, while in Vietnam the reform was firstly realised at "bottom-up level" in towns or provinces where people identified the problem of the old-fashioned collective economic model and were brave enough to break it. Therefore, although it has been called the Reform, the idea of making a correction seems to be more accurate as the fact reveals that the fluctuation and retarded status of the economy before 1986, which entailed the endemic inflation that initiated the monetary revaluation, could not be more tolerated.

In a recent review to analyse why North Korean leader Kim Jong-un wants to take the Vietnamese model as his muse for his vision of transforming North Korea's economy, Toru [Takahashi \(2018\)](#) stated that from a third-party viewpoint there are differences found in the way that China and Vietnam conducted the Reform. Although the common backbone idea was to achieve rapid economic growth through the introduction of foreign investment and promotion of exports while maintaining the communist party's grip on power in both countries, the case of Vietnam was not a replicate as seen in the case of the land reform that had brought a tragic scene in the 50s. By looking at the gross domestic product per capita of both countries, the index of China surely outpaces the number of Vietnam by at least four times ([Takahashi, 2018](#)); nonetheless, it would be naïve to state that the model of China is supreme. By contrast, China holds a more defensive position in terms of signing free trade agreements with other countries, especially those from the Western world. Although China had joined the World Trade Organization six years before Vietnam, the number of agreements that they have signed as of 2018 is only 17, as compared to 12 of Vietnam. This suggests that in terms of economic liberalisation, the Vietnamese government seems to be more open-minded in shaking hands with developed countries who could bring more benefits to the country.

The reason why the Chinese model cannot be cloned to the Vietnamese context could be attributed to China's idiosyncratic size and population: China has a total area of 9.5 million square kilometres that hosts a huge population of 1.3 billion people – undoubtedly the first position in the world census ranking. Vietnam only has a total area of more than 330 thousand square kilometres with 95 million people. The huge gap in terms of geographic features and demographics illustrates a reality that the ability to supply inexpensive labours, the size of the domestic consumption, and the volume of products that could be exported are not identical between these two. Thus, using the formulas that were customised for the Chinese context in Vietnam is not suitable. Besides, the focus that each government has on the planning policy is not the same. [Takahashi \(2018\)](#) pointed out that China seemed to

emphasize developing Shanghai, Shenzhen and other coastal cities with the aspiration of empowering the exportation advantage through the system of ports in these places. As a matter of fact, special economic zones have been set in these cities, while other regions in China have been underrated. Vietnam, by contrast, did not lean on the idea of coastal areas, although Vietnam owns a coastal line of 3,000 km in length. The concept of balance is a more favourable option, especially when the government needs to deal with the north-south divide left by the past of the Vietnam War, in which the economic status of the two north-south regions did not match each other. Thus, while Ho Chi Minh City is the vortex that pulls in foreign capital thanks to its more cosmopolitan infrastructure, the industrial centres have been more equally placed in the centre and the north of the country, which guarantees a more balanced posture for the domestic economy. Last but not least, the attitude of Vietnam towards the Western countries, even its former enemy like the US, is gentler than the protectionism concept employed by the Chinese government which inclines towards encouraging domestic products and blocking the influence of Western cultures. One notable example is the ban of Google and Facebook in China to promote local websites or apps like Baidu and QQ.

A softer model seen in the case of Vietnam is a bonus point to the introduction of online games as the Vietnamese government has not applied a strict protectionist approach to the country. Although [Geoffrey Cain \(2014\)](#) commented that the censorship that embraced the communication development in Vietnam was evident as the mass media experienced only limited freedom, followed by a rapid retrenchment created by the Communist Party, the ambition of catching up with the developing pace of other developed countries ([Ure, 2008](#)) had allowed the presence and emergence of online games and also saved them from being seen as a product that could downgrade the moral values of the youth, which was the scenario that had happened with wuxia novels in the past. Furthermore, the wave of neoliberalism also influences the new generation of leaders in Vietnam who now acknowledge the drawbacks of a strict communist scheme, and are ready to integrate through playing by the rules of the world economy, even if those are rules of capitalist countries ([Yeo and Painter, 2011](#)). The increasing number of free trade agreements and the efforts spent to encourage the implementation of the Trans-Pacific Partnership (TPP) which will facilitate the trading activities between Vietnam and other involving countries, are the most concrete evidence.

However, it does not mean the socialist market economy has not brought up issues. [Yao \(2002\)](#) noted that along with the idea of capitalist mechanism, the concept of *guanxi* (relationship or *quan hệ*), the rise of princelings in the ruling structure of the Communist Party, and the signs of crony capitalism- the blurred separation between the state and the business seen in the model is also a root of corruption. In the case of online games, in addition to the bureaucracy that occurred before the Reform, which was the consequence of a total state-centred controlling scheme, the conflict between the maintenance of the ideology and power of the Communist Party and the prosperity that could be brought by the open market with international standards of capitalism still puts the online gaming industry into a scenario of walking between two bullet lines. As a cultural product that could embody harmful contents to the stability of the ideology, along with several social issues that were depicted by the press including addiction and crimes, the Vietnamese government acknowledged that online games must be under control, even to the point where they should be banned for a period if no effective solutions were given. On the other hand, the visible benefits brought in by the industry are undeniable, and the risk of facing accusations from Western countries that the government does not tolerate the development of the entertainment industry is also foreseeable. That has encouraged the Vietnamese government to show an attitude of reluctance with one eye closed towards the expansion of online games in Vietnam. That could be seen through the issuance of special licenses to game titles even when the ban policy was still valid, or the loose control applied to illegal games.

According to the interviewees, this reluctance is a double-edged knife. The dark side of this dilemma is that the procrastination in processing license applications is unavoidable, and the policies to help manage the industry and the market always seem to be incomplete or outdated. Nonetheless, the bright side of it, which is a trickier point, is that companies can take advantage of the shortcomings of the policies to gain benefits by running illegal games without any concerns for a harsh penalty.

The administrative delay has been well-recorded. Although online games were introduced to Vietnam in 2003, a policy that directly deals with the management of this format needed to wait for three years before it could be released, which is the Circular 60 promulgated in 2006. This policy, although considered the first endeavour to seriously bring the problems of online games to the attention of the state, was sketchily compiled with only seven pages containing 16 articles. Most of these articles were soon outdated while the rest was only valid at the theoretical level. In this Circular, the state did not allow the release of games with violent contents, but the authority that composed this regulation did not provide an adequate description of how violence in video games should be defined. Lê (2009) noted that gamers who played shooting online games argued that what they were playing should be considered e-Sports, and the violence on the screen was the nature of the game. If violence is the reason to ban some games, then wuxia games must also be targeted since characters in these games use cold weapons; thus several killing actions including hacking, slashing, stabbing, chopping, etc. could be argued to provoke the players even more intensely than a quick death of mercy with bullets. Those who play wuxia games provided another perspective, indicating that most of the wuxia games used animated graphics, thus making the killing actions similar to comics or animations involving unreal humans. The violence, then, had to be traced back to shooting games since these games potentially created more pressure and depression in players. This ongoing debate, unfortunately, did not receive the attention of the authority while the Circular 60 was still valid. Additionally, the list of vague terms in this Circular is not exhaustive. Article number 4 regulating the production of online games states that companies in Vietnam are not allowed to produce games that go against the history and the traditional culture of the nation. The over-emphasis of the state on the national cultural identity in communist countries is a usually seen phenomenon, the presence of the phrase “*history and traditional culture*” is thus understandable. Nonetheless, since this term is always controversial, the lack of a clear definition only made this Circular less valid.

The second problem of this Circular is the limit set on the playing time, which only allows gamers to play five hours per day. After this 5-hour permitted slot, there will be no bonus points added to the account of players. Bá (2009) asserted that this challenging condition could be bypassed easily if the player had more than one account. Besides, if the players were above 18 years old and were fully responsible for the actions that they made, should this 5-hour limit be seen as a barrier to the freedom of citizens? This limit did not only affect players but also the companies because if the players could not receive any bonus after five hours, then they seemingly would not have any reasons to keep playing, which means no transactions would be made to buy in-game items. Last but not least, most of the companies only had 10–15 days to design a software that would manage this hour limit before a group of agents from the State Inspectorate came to check on them. The integration of this new function into the controlling system of each game was conducted in a rush, leading to the chaos in which some companies' system seriously malfunctioned. The maintenance time did cost these companies a tremendous amount of profit loss. Although the intention of having this article was goodwill to prevent gamers from addiction, the reality was not as the authority had predicted (Bá, 2009).

The third problem came from the business model applied to online games that were released in the beginning. Back to the 2000s, the pay-to-play model was the dominant monetisation method employed by Vietnamese companies. That was the reason why in the article 9 of the

Circular, the authority decided that in-game items could not be generated for commercial purposes, which means it could not be traded for real money. Nonetheless, the pay-to-play model soon failed after 2006 and was replaced by the free-to-play model, according to which selling in-game items is the main way to make profits for the publishers. That led to irony because after 2006 most of the Vietnamese game companies' revenues would have been and continue to be illegally generated if we consider the Circular 60 the main and only legal framework to manage the industry with which companies need to comply.

The fourth problem is regarding the gamer's profile registration. The chapter III of the Circular regulates that game companies in Vietnam are required to have a database to store personal profiles of gamers, which could be used to prevent young players from accessing games with violent or obscene contents. Nonetheless, in reality, the authority did not have an equivalent database to help companies verify the information provided by gamers. Most Internet café owners stated that although there was a policy in 2005 setting out the conditions that people who are under 14 years old need to have the permission from his/her guardian to use the Internet services in these places, these owners usually did not nail that regulation in mind as long as these young customers pay for the services. All of these problems prove that Circular 60 is no longer valid to manage the industry.

The issuance of the Decree 72 in 2013 was considered a remedy to cure and patch the management process, a duty that the Circular 60 failed to accomplish. But the release of this decree is still arguably a late intervention. After the Circular 60 became an impasse, along with the pressure of the press, the ban policy in 2010 was a temporary endeavour of the state to calm down a society that was recognising online games as a source of negative influences. This policy also helped the state to buy some time to prepare a complete decree which could cover most of the issues reflected by the press. This process took three years to complete - a long period that does not match the ever-changing speed of the industry. It should be noted, however, that the release of Decree 72 is to some extent an escape for game companies since most of the companies could not endure the restraint effect caused by the ban policy for any longer, especially when most of them needed to “go underground” by importing and running games illegally while keeping a lookout for potential fines no matter how small. Another reason is that they did not know whether or when their operating license could be revoked, thus the situation of having no management policy to facilitate the operation of the industry is their least desirable circumstance.

The change detected in this decree is that the subject of this regulation is no longer domestic companies solely, but also covers foreign game companies that operate in the Vietnamese market. The ban policy was revoked, but not all genres of games were subjected to be granted the license if the contents included horror, violence, obscenity, or sedition. The most striking feature is that shooting games were no longer acceptable to be imported, regardless of their origin (imported or self-produced by domestic companies), which means strategy games and role-playing games would be more likely to become the main focus of companies. The description of violence was composed more clearly, although the level of details was not as clear as the description of the ERSB ratings. Besides, Internet cafés were no longer not allowed to open from 10 pm to 8 am of the next day, possibly to prevent players from over-playing. The owners of these cafés are now encouraged to join training sessions hosted by the authority to help them understand the new policy and could comply accordingly.

The game classification in this decree could be considered an improvement since online games have been categorised in accordance with their methods of connection (G1 to G4) and the age of gamers (with which the suitable content was described to suit three age ranges: 00+, 12+, and 18+). The shortcomings in this type of classification are that the list of age ranges is not exhaustive and the description added to each age range is still vague. It is fascinating to note that the content-based ratings and classifications that have been applied worldwide were criticised by Jiow et al. (2017). The authors claimed that although

the universal audiences have long been familiar with the ESRB and The Pan European Game Information (PEGI) ratings, the experiments conducted in reality showed that Asian parents might have an alternative viewpoint since the way they defined violence was not necessarily the same as how the industry assessed violence. In most cases, the parents showed a more protective tendency; thus they thought that some of the games labelled with E (Everyone) would not be suitable for children under 13, while some games rated as T (suitable for Teenagers) should be labelled as M (Mature) instead. Therefore, a parent-centric approach for Asian societies to create game ratings and classifications has been suggested, an approach that the Vietnamese authority might want to take into account.

Although the new procedure to apply for the license described in this decree was compiled more articulately than the previous ones, the minus point of this decree is that the procedure is still complicated with many phases that generally take months to be completed, although the decree stated that everything could be processed within 15 working days. The reason behind that was, as explained by the interviewed administrators because the government considered online games a cultural product produced and distributed by the media industry. Duy (2017) cited a sentence of Colonel Nguyễn Ngọc Chắt of the Department of Cybersecurity in which this Colonel stated that online games, especially illegal games, could contain spyware, malware, or information that go against the ideology and policies of Vietnam, and can even be used to embed software that raises a cyberattack to other countries in the name of Vietnam, thereby disgracing the country's reputation. With these obvious risks, a strict and careful screening process is preferable. Nonetheless, the administrative delay as analysed above should also be counted in.

The wave of neoliberalism significantly influenced the perception of political leaders in Vietnam in the sense that they now have agreed to open more conferences and meetings to exchange opinions with industry leaders in order to seek a consensus. All four interviewed administrators agreed that not all meetings could bring positive results immediately; nonetheless, the cooperative attitude of the authority should be what the industry leaders expected to see since they needed their voice to be heard. Evidently, several changes were made after these meetings that deserved to be credited to the efforts of the state.

The most salient change is the release of the Decree 27 (*Nghị định 27*) in April 2018, which is a consolidated policy that combines Decree 72 and four other Circulars (23/2013, 09/2014, 24/2014, and 24/2015). This new decree is not merely a fusion of previous policies since it has adjusted and abolished five conditions for the licensing of the content of online video game scripts, and two notification procedures for the amendment, supplementation, deadline extension and re-granting of licences for G1 video game services. The decree also eliminated 11 types of documents required to register the provision of online video games (Xuân, 2018). Decree 27 added new regulations, such as the management of applications for the provision of integrated websites, social networking platforms, and online games in application stores. It also shortened the time required to grant licences for online games from 30 to 25 working days, and the time to re-grant licenses from 15 to 10 working days. The new decree also provided stipulations for the suspension and revocation of licences of online games if the game companies were found to violate the regulations two times (Article 32k), which means that companies could now face the possibility of losing their license if they do not comply with the law. This is strikingly different from the situation in the past in which the penalty was purely finance-related, and the companies only had to pay the fines in order to keep operating. This should be considered a serious and more severe solution that the state wants to employ in order to block the expansion of illegal games completely. We can see that in the past, a game operated without a license was subject to be fined, but now a company operates without a license could be targeted and handled in accordance with the criminal law. This is an escalation in terms of penalty since the possibility of being prosecuted is more explicit, even when the defendant is foreign companies who are not under Vietnam's jurisdiction.

Moreover, the decree also added that the hardware system providing the service of all online games must satisfy such conditions including an ability to store and update gamers' full personal information and management of gamers' playing time to ensure the total time of playing all G1 games owned by an enterprise would not be more than 180 min per day for each user whose age is under 18. Decree 27 also relaxed the conditions and procedures for registering the provision of G2, G3 and G4 games by removing the requirement of submitting the Confirmation of Copyright since this form has been difficult to acquire (Tuệ, 2018). The critical change seen in these amendments showed that the strict control of the state has been loosened in order to ensure the growth of the industry and to justify that the government does not follow a dogmatic path of management, although the state's over-scrutiny is still clearly present (Anh, 2018).

Although Decree 27 attempted to find the answers to the inquiries left by the previous policies, it is still not a complete legal structure since it still faces the issue of payment for in-game items. Most recently, this issue has been brought to light through one of the biggest scandals covered by the Vietnamese media in the first half of 2018. This scandal involved the organisation and operation of an online gambling chain with a cash flow of more than 400 million USD or the biggest betting ring that has ever been raided in the history of Vietnam. The most important feature of this criminal ring is the involvement of the former Head of Ministry of Public Security's cyber-crime division Nguyễn Thanh Hóa, the former CEO of VTC Online Phan Sào Nam, and the responsibility of Lieutenant General Phan Văn Vĩnh who was the former Chief of General Department of Police. These three people were arrested for colluding with other criminals in running this online gambling ring via the portal called *RikVip* (Do, 2018). Online gambling is easily the most sensitive case of online gaming, and the Vietnamese government always wants to assure that the Internet cannot be profited to be used as a platform for gambling. There were only two companies in the past that were licenced to operate online card games: VTC and Zing (a sub-unit of VNG). After the release of Decree 72 in 2013, the government did not grant any more licenses to this genre. Even with games that are currently operated by VTC and Zing, the authority regulates that in-game money cannot be exchanged to real money with the same value (Khôi, 2018). Other card games or betting games found in the Vietnamese market now are running illegally. This scandal is considered opprobrium to the reputation of the government and the stability of communism since there was the presence of high ranked police officers in the leading team of the betting ring. That led to two critical issues. First, the downfall of the officers (who were also high-tier members of the Communist Party) could trigger the loss of faith in the leadership of the Party, especially when this leadership has been challenged for years after many cases of corruption discovered in the last two decades. At the same time, the faith of people has fluctuated since the state has not had a more decisive attitude towards the dispute over sovereignty with China. Undeniably, any other issues that involve the moral degradation of a high ranked officer would intensify this tension. Second, it reveals that the government has not managed the online game industry efficiently, allowing a criminal ring to break the law for years without being discovered sooner.

In the preliminary investigation, it has been found that the primary way customers use to top up their account of this online gambling website is by using prepaid cards, which can also be used to top up mobile phone accounts (Hà, 2018). Using this type of card to top up accounts and use that amount of money to buy in-game items has been the main method to operate and realise the free-to-play model in all online games in Vietnam. The Vietnamese publishers create online payment portals that allow people to top up by card, and a part of the total revenue from this source will be left out as the commission fee to pay the mobile phone network operators (Viettel, Vinaphone, or Mobiphone - the three biggest mobile service providers in Vietnam). That functioning could have remained if this gambling ring had not uncovered. In April 2018, all three network providers announced that they no longer supported the act of using prepaid cards to top up online games' account

(Việt, 2018). Since this was the main method that game companies receive the money and make profits, blocking the money stream without providing any other solutions created a dilemma to all operating game companies. In the recently released Decree 27, this matter was not even mentioned, leaving behind the inquiries posed by Vietnamese companies on the existing conditions of the industry. Lê (2018) stated that after the announcement of those mobile network operators, the industry witnessed a loss of 80–90% of revenues in the next few days.

That being said, there is still one optimistic viewpoint. Since illegal online games only used prepaid cards as the main source of cash inflow while other legal companies still had their channels of top-up such as prepaid cards that they self-released, blocking the use of prepaid phone cards was the most effective way to remove them completely. Although Tich (2018) agreed that the difficulty other mainstream companies need to face was undeniable, the bright side of this policy could be seen from that perspective. Nonetheless, blocking does not seem to be the most optimal solution because if the government wants to solve the problem of illegal games thoroughly, the starting phase must be from the root by blocking the entrance of these games to Vietnam, which can be done technically. Although blocking this top-up channel could temporarily solve the issue, it does not stop companies that run illegal games from finding other ways to receive the money, especially when virtual cards, digital wallets, the blockchain technology, and the concept of cryptocurrency are no longer unfamiliar concepts in Vietnam. Thus, the prohibition of using prepaid cards to top up game accounts can only be seen as a reassurance which provisionally cools down the Vietnamese society which has recently been shaken by the discovery of that online betting ring. It is also worth mentioning that this \$400 million ring is only the tip of the iceberg. Since 2018, there are many more similar rings have been cracked down, and the value size of those rings also increase tremendously, from \$858 million (Pham Du, 2020a) up to \$2.77 billion (Pham Du, 2020b).

Tangentially, it is relevant to mention the mutual relationship between online gaming and online gambling in order to explain why the Vietnam government tends to place their concentration on the idea of applying stringent rules instead of focusing on compiling more comprehensive guidelines. Morris (2015) noted that online gaming in Vietnam refers to both games played over some form of computer network and online gambling, which means gambling activities facilitated by the Internet. Nonetheless, online gambling, from the perspective of Vietnamese lawmakers, is not a full-fledged, independent and separate branch of the gambling industry. Instead, it could be merged with major branches of gambling activities which consist of lottery, casino/prized electronic machines, horse and greyhound race and sports betting; thus, and specific operating conditions and restrictions must be obtained differently. Except for online lottery (which was established in 2013 (i.e., Vietlott) to offer online lottery lotto games, digits games and fast drawing games nationwide), other forms of gambling using the Internet as a platform have been so far strictly prohibited or at least not officially permitted (Morris, 2015). Therefore, online gambling masked as online gaming is seen as an activity that seriously violates the law and could open the path for other criminal activities which include but not limited to money laundry and corruption. In fact, there were some solutions recruited by the Vietnamese government, including blocking direct transactions to online gambling sites or offshore payment channels that have partnerships with online gambling sites.

It would be one-sided if we only see the dismantlement of online betting rings as a simple manifestation of moral degradation, or some one-time crimes that are taken for granted. Instead, it triggered a chain of strict regulations of which the ban of prepaid phone cards could only be seen as the igniting step. On 24 August 2018, the Authority of Broadcasting and Electronic Information (ABEI) promulgated the Dispatch 575 (Công văn 575) in order to strengthen and tighten the management framework of online games in Vietnam. This 2-page dispatch, once again, emphasized the point that gaming companies in Vietnam must abstain from releasing games without applying to an official license granted by

the authority in charge, and they must ensure that games released only contain contents screened and approved by the authority. The idea of skirting around the procedure of content approval and allowing virtual assets to be exchanged to real money is completely forbidden, while the concept of using prepaid cards as a payment method should deliberately be considered since official guidelines for this type of payment still need further elaboration. It is noticeable that although the promulgation of this dispatch is a critical monitoring and warning mechanism to ensure the accountability and responsibility of gaming companies in Vietnam, the confusion showcased by the authority is also noted at the same time since they have to admit the lack of a complete guideline that helps clarify the payment issue. The release of this dispatch should be seen as a situational solution since the ban on phone prepaid cards was lifted one week earlier. From the first half of 2018 onwards, Nesterenko (2019) saw that the revenues made by gaming companies in Vietnam never were the same compared to the previous period, which is proven by the global revenues ranking issued by Newzoo in which Vietnam fell from top 25 to top 30 after a few months. Besides, the local publishers could not pass the regulatory review resulting in the cancellation of many projects. The sharp decrease in revenues and the potential risk that many companies must declare bankruptcy forced the Ministry to agree to unchain the use of prepaid phone cards. While a radical change in managing payment is likely more theoretical than practical for the time being, the issuance of Dispatch 575 served as both an excuse to defend the decision of lifting the ban and a short reminder that the authority wants to deliver to the companies rather than a properly fitting remedy.

This extent of the governmental involvement, while it helps tackle both illegal games and online gambling activities, is detrimental to the online gaming industry in Vietnam in a long run since it might throw a spanner to investment plans of foreign companies to the gaming market of Vietnam. This is reflected more clearly in the case of mobile games.

Apple and Google made their stores available in Vietnam in July 2018, with loads of games from local publishers immediately conquering the market. Chau (2019) noted that Vietnamese authorities have been working with Apple, Google and Facebook to remove unauthorized online games providing cross-border services. Many were found contain elements of gambling, violence, profanity or distortion of Vietnamese history, while others were published without authorization. The information ministry has therefore been working with Google, Apple and Facebook to block, take down or stop ad monetization for these games. Although this raid received the applause from the press as the government does not hesitate to deal with illegal activities, these infringing local regulations have discouraged foreign investors to a certain degree. It is evident that global publishers are in a quandary: they either have to comply with the strict regulations or quit. Giving up, actually, is not absurd. In 2018, Tencent and NetEase tried to publish *PUBG* and *Rules of Survival* without the license from the local government, but the authorities had Google and Apple remove the titles from the stores. More recently, the Finnish giant Supercell had to exit the market in July 2019. Supercell's portfolio of titles includes *Hay Day*, *Clash of Clans*, *Boom Beach*, *Clash Royale*, to name but a few, none of which are now available in Vietnam. According to Chapple (2019), not just no longer to download, users will not be able to continue playing the games. The Finnish developer said that players who purchased items in its games are not eligible for refunds despite the move. Users can retain their game progress through the use of a Supercell ID account. There is no foreseen plan for if or when Supercell's titles will be available again in the country. Although the government emphasized that this move should not be seen as a tactical solution to promote protectionism and create hindrance to foreign games since games released by foreign companies are still welcomed as long as they comply with a set of rules, which is proposed in both Decree 72/2013 and Decree 27/2018. Chau (2019) quoted the statement of ABEI and pointed out that in order to have their games licensed, foreign companies must either collaborate with Vietnamese companies and have their Vietnamese partners carry out the procedures or establish a

branch and representative office in Vietnam in which the foreign company's capital contribution must not exceed 49 per cent. Vietnamese companies must not collaborate with foreign firms to act as a front and collect money from players to transfer to their foreign partners since several such companies have been busted and punished by the information ministry and the police. In order to avoid it, the ministry requires that Vietnamese companies collaborating with foreign game publishers must have a server to store players' data in Vietnam, and must be able to provide players' information when requested by the authorities. The games must also have their content and images altered to be in line with Vietnamese regulations, as had to be done with the Vietnamese version of the game *PlayerUnknown's Battlegrounds (PUBG)* which had the blood's colour changed to blue and the voice chat function disabled.

The ongoing constriction in 2020, surprisingly, is not delayed by the onslaught of the novel coronavirus COVID-19 outbreak. In February 2020, the government issues Decree 15/2020 (*Nghị định 15*) with nine chapters and 124 articles, providing for regulations on penalties for administrative offences in the sectors of post, telecommunication, radio-frequency, information technology, and electronic transactions. Online games are also subject to be regulated by this newly released document. Being in effect as of 15 April 2020, the composition of a penalty stated in this decree consists of specific ranges of fines, additional penalties, and remedies. In addition to the penalties under Decree 15, depending on the nature and the degree of the specific offence(s) pertinent to data protection, the offenders may also be subject to the sanctions under other legal documents or even prosecuted for criminal charges (Luong, 2020). While most of the articles that relate to online games aim to adjust the compliance of gaming companies and their agents, which could be considered a fix to fill the gap left by the Dispatch 575 two years ago, Article 106 regarding players is a striking feature that may alter the current status of online gaming in Vietnam. This article states that the act of trading accounts and virtual items in the game will be severely punished, up to 3 million VND. The prevailing theme of video games and the in-game economy motivate many players to engage in activities to earn virtual money as a part of the self-improvement process. However, not all players want to spend their time on these activities (Constantiou et al., 2012). Players can bypass this mechanism by purchasing the items they wish to acquire real money. This is known as real money trading (RMT), and such items could be obtained in various marketplaces. From the industry perspective, although operators try to limit the amount of RMT either through policy or through licence agreements that do not tolerate the activity since these activities directly affect the gameplay balance and the revenues of the company, their efforts have not been successful yet. It bears noting that there are still many people casually selling virtual game items and accounts online. Not only individuals, but some organizations also set up websites, trading forums, or Facebook groups-those that have existed for such a long time before the release of Decree 15, to commit this activity in large quantities. Although this is a new decree and it still needs time to verify its validity, the possibility that it cannot completely shut down RMT activities is not futile as the lesson retrieved from the case of Circular 60 in the past is still worth consulting.

Conclusion

The state plays a vital role here to help explain why online games should be chosen to represent the idea of transnationalization. In contrast to other cultural products, online games have received much negative feedback, and it even triggered some polemics in the press, mostly about game addiction and game-related juvenile delinquency. As a state that has just stepped out from the shadow of extreme bureaucracy, the Vietnamese government has shown a reluctant attitude towards online games since it brings a lot of financial benefits and troubles at the same time, which is the political interface given birth by the internal ambivalence of the socialist market economy that Vietnam has pursued since 1986. If dissecting other cultural products which are also the outcome of the

transnational process (TV programs, foreign magazines etc.) can only unveil about the way the state accepts something new, analysing online games helps us know more about the way the state faces something that is beyond their competency at the moment, and the method that they use to make it under control. A good example was about the year 2010 when a lot of new games from China were imported (*The Journey to the West, The Three Kingdoms, The Condor Hero* etc.), the press still confronted the government, and the illegal operation of some other games were occurring, the state released a ban policy which stated that no more online games would be imported. That decision stumbled on a lot of critiques and counter-opinions, mostly because people think that as the state is unable to control and manage, prohibition was selected just to ease the pain, although that policy was a provisional one.

When scholars have tried to dissect the situation of mass media in Vietnam and the intervention of the government to control the telecommunications industry in general and the online gaming industry particularly, they tend to put their emphasis on the concept of censorship, which seems to be the very first thought when they examine the constraint found in the media market of communist countries like China, North Korea, or Vietnam. That approach is not wrong since the reality does prove that the press in Vietnam and China cannot freely operate as an active social actor without the "guidance" of the Communist party. The missing of private newspapers or magazines in Vietnam is one of the reasons that brought Vietnam down to the rank of 175th out of 180 countries in the world in terms of the freedom of the press, which is only better than China (176th) and North Korea (180th) (Reporters without Borders, 2018). Nonetheless, in the wake of technology and the rise of other economic forces in the world, the concept of censorship in Vietnam is no longer worthy of being the only bull's-eye when analysing media-related problems. The expansion of the Internet and the network technology have caused the deep penetration of social networks like Facebook, Twitter, or Instagram to the everyday life of Vietnam. In order to take the ultimate control over these platforms, the government could not apply the traditional method that they have used to govern the press, television programmes or radio shows since we have a new concept called citizen journalism. Courtney Radsch (2013) defined this concept:

[...] as an alternative and activist form of news gathering and reporting that functions outside mainstream media institutions, often as a response to shortcomings in the professional journalistic field, that uses similar journalistic practices but is driven by different objectives and ideals and relies on alternative sources of legitimacy than traditional or mainstream journalism.

This neo-special form of journalism is a fusion between citizen media and content that could creatively and freely be created by users. By combining the term "citizen" with "journalism", this could be seen as a bridge that connects two shores with one is about the perception of the civil rights and the system of social responsibility; while the other refers to a domain specialising in reporting and spreading the information. Karlekar and Radsch (2012) noted that this term indicates the existence of online and digital journalism conducted by anyone who was not even trained to become reporters. By the fact that they are completely or partially amateurs, this concept embraces the connection between the practice of journalism and idea of the political and public sphere, with which the freedom of the press is widespread at the micro-level, infiltrating the mind of each person. With the support of new media technology, notably social networks and media-sharing websites like YouTube or Dailymotion, breaking news, comments, personal oppositions, rumours or even hoaxes can be diffused more quickly than other traditional media. Since smartphones and other electronic devices are no longer luxurious items that could not be possessed due to their high price as seen in the past, each human can be a reporter, a commentator, or a critic. The total control that the government wants to apply to these platforms require a considerable investment not only in terms of money but also an adequate technology that could be used to surveil all posts,

threads, comments, chats, to name but a few; and even a highly qualified human resource that can be in charge of the surveillance. That means the demand for having scrutiny in the new era of technology will be dependent on the capability of that nation in terms of economics and technology. If Vietnam cannot fulfil these hard conditions, then the idea of censorship would be disabled. It is not because the government does not want, but because they are not capable of carrying out. Besides, as aforementioned, high-ranking officers of the Department of Cybersecurity were kept in custody after that 400-million-USD online betting ring was busted out in 2018, which means the concept of censorship is a flaw from inside. In terms of censorship, it rings a bell that brings me back to a very classical quote: Who observes the observers. Along with the rise of channels like Facebook or YouTube that stimulate the concept of civil journalism as analysed, the total control of the state over the media in Vietnam has been weakened. Online gaming, in this case, might open a novel way to think about the state in Vietnam and its governance model. Instead of putting the focus on the censorship, which is already apparent, researchers might want to examine the state's attitude as well as the released policies (as a response) when dealing with a new media format.

This paper has argued that when dissecting the position of the government in coordinating the online gaming industry, there is more than one role that should be taken into consideration. The reincarnation of the political model entailing the transition from an extremely closed state-centred scheme to an open market economy has caused the governance over telecoms in Vietnam to significantly diverge from the standard practices seen in other neoliberal transformations. As Yeo and Painter (2011) commented, we have not observed a close relationship between the state, its ideology, the business, and the balance between these parties, which are the key features found in the model of telecoms management of China and Vietnam. Although Vietnam, as analysed, seems to replicate the model of China to some extent, the discourse of reform and control in this country was given a local interpretation with a softer and more flexible model. Thanks to this flexibility, technological innovations of the Western world have been welcomed and adopted, although the regulation of online games in Vietnam still focuses on enhancing the leadership and primary involvement of the state as a major stakeholder, and on empowering the ideology of the Communist party. Unlike China who has recruited a more protectionist approach, the aspiration to develop the domestic market of Vietnam has allowed its pro-international engagement, which also explains why the legal structure of Vietnam has provided companies with some leeway, with which they can move forward faster. Nonetheless, it would be essential to note that bureaucracy is still evident in the working manner of Vietnamese policymakers, along with an incompetent understanding of the industry. The consequence of this loophole is the expansion of illegal games, the presence of online betting rings, and the decrease of faith that Vietnamese companies have in the government. The bright side of this issue is that the authority with young leaders (all administrators that the author interviewed are under 45) also learned about the situation and have engaged with the industry more effectively, listening to their opinions and adjusting accordingly. As online gaming is still emerging in this S-shaped country and the governance of the Communist party-state is still valid, the development of the industry and the strength to compete at the regional and global level can only be affirmed by a government that agrees to change and integrate. This fast-growing industry also promises further studies that touch upon media governance in Vietnam in the future- those that not only examine the statutory regulation (the state) but also dissect the involvement of non-state actors.

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Author contribution statement

Q. A. Phan: Conceived and designed the experiments; Performed the experiments; Analyzed and interpreted the data; Contributed reagents, materials, analysis tools or data; Wrote the paper.

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The authors declare no conflict of interest.

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