Vietnam's Internet Governance Policies: Opportunities for Developing a Competitive Digital Economy

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Acronyms

ASEAN	Association of Southeast Asian Nations
CAT	Communications Authority of Thailand
COD	Cash On Delivery
DNS	Domain Name System
EIU	Economist Intelligence Unit
FDI	Foreign Direct Investment
IAP	Internet Access Provider
ICT	Information Communications Technology
IDI	ICT Development Index
ISP	Internet Service Provider
MDA	Media Development Authority
MIC	Ministry of Information and Communications
MPS	Ministry of Public Security
MNC	Multinational Company
MSC	Multi-media Super Corridor
ONI	OpenNet Initiative
PAE	Policy Analysis Exercise
PM	Prime Minister
NSCICT	National Steering Committee on ICT
RTP	Royal Thai Police
SME	Small and Medium Enterprise
SOE	State-owned Enterprise
UGC	User-Generated Content
USD	U.S. Dollars
VCP	Vietnam Communist Party
VIA	Vietnam Internet Association
VTC	Vietnam Television Corporation

Executive Summary

This report identifies aspects of Vietnam's Internet regulatory framework that hinder or support the innovative capacity of Vietnamese ICT startups. Through surveys of domestic ICT startups, small and medium technology enterprises (SMEs), and large corporations, this report provides a holistic understanding of Vietnam's current Internet ecosystem, focusing on the main regulatory challenges that hinder technology innovation for domestic ICT businesses. The report concludes that Vietnam should consider an Internet governance strategy that prioritizes transparent regulatory practices that enable growth in the area of user-generated content (UGC) platforms, rather than simply building up hard infrastructure. Such a shift in strategy is required for Vietnam to remain competitive with its regional neighbors.

Research findings from extensive interviews, and such secondary sources as industry-level data, national statistics reports, and national and international organizations case studies reveal key challenges facing the Vietnamese ICT sector, including:

- Primary barriers to Vietnamese ICT startup innovation includes financial constraints, particularly the difficulties in securing investment and the low usage of credit cards;
- Increased Internet content management may encourage more risk-averse behavior from startups who already use or are considering utilizing UGC platforms;
- Established ICT companies believe current Internet content management policies are one of the main barriers to greater incorporation of UGC into Vietnamese websites and limits opportunities for innovation, running counter to the development of digital industry in Vietnam;
- Surveyed domestic firms were not aware of any government-sponsored programs supporting Vietnamese early stage ICT businesses; and
- Language ambiguity in the Internet Management decree enables certain political actors to interpret Internet governance policies in a way that suits their political interests.

With the ICT sector rapidly developing in Vietnam, the government faces challenges in implementing policies that support a robust and growing ICT sector, while also ensuring domestic stability. The Ministry of Information and Communications (MIC) candidly admits the difficulty of keeping up with the evolving sector. However, a clear and cogent Internet governance framework that is conducive to the growth of the ICT sector is necessary for Vietnam to establish itself as an advanced, competitive ICT nation. The final section of this report provides recommendations targeting different stakeholders in Vietnam's Internet ecosystem, namely the startup community, the established ICT firms, and the government.

Recommendations for startups:

- *Engage in Internet policy discussion.* While startups do not currently see engagement with the government as relevant to their short-term business operations, startups must engage in these policy discussions to ensure that barriers—financial and governance—to their businesses are removed.

- *Establish formal trade association.* As startups engage with the government, these firms can increase their leverage through collectively channeling concerns. One such way to do this is to establish a formal trade association among the startups.

- *Collectively lobby for government-sponsored support of ICT entrepreneurs.* Once formed, the trade association can lobby the government to encourage state-owned banks to provide low-interest financial loans or the MIC to provide grants as an alternative source of finance to ICT startups. The group could also work with the government to educate existing finance institutions about the differential capital needs of technology startups versus more traditional businesses.

- *Collectively lobby for a more open Internet.* The startup community, through their trade association representative, should lobby for more open Internet governance policies to allow their financial resources to remain invested in content development, incorporation of UGC, and other revenue generating activities, rather than having to divert these resources towards building content monitoring capabilities.

Recommendations for established corporations:

- *Build strong network with startup firms.* The established firm and startup communities are codependent, and their relationship is needed for the prosperity of the ICT sector in Vietnam. Large corporations like Viettel and VinaPhone should look to support the startup community. This could be done through sponsoring conferences, providing cash grants, and organizing business case competition, among others.

- *Focus on nurturing UGC and innovation rather than on Internet infrastructure.* Increased hard infrastructure development does not necessarily mean that Vietnam will reap maximum benefits enabled by higher speed Internet access without a corresponding increase in bandwidth demand. Telecommunications companies should prioritize nurturing an Internet ecosystem that encourages more UGC, thus leading to increased demand for faster Internet.

Recommendations for the government:

- *Promote ecosystem mentality.* The government should encourage Internet policy dialogue with all stakeholders, especially the domestic ICT startup community. This dialogue should also highlight opportunities for engagement between the ICT startup community and government to advance the country's ICT development goals.

- *Launch programs to alleviate identified constraints.* Other governments in the region are already strengthening their policy efforts to target increased user application of new digital technologies through programs supporting entrepreneurism. The government should consider offering tax exemptions, equity financing schemes, cash grants, debt financing options, and business incubator resources for domestic startups.

- *Understand that investment in infrastructure is inextricably linked to Internet openness and a robust UGC industry.* To encourage firms to increase hard infrastructure investment, the government must relax its control on the Internet and nurture a robust UGC industry. When there is an increase in demand for faster Internet bandwidth, the private sector or the SOEs would naturally see market opportunities to invest in an expanding broadband network.

- *Articulate clear, cogent Internet governance policies.* It is essential that the government develops and implements cogent Internet governance policies, and defines what online content constitutes as "prohibited" material in the Internet Management decree.
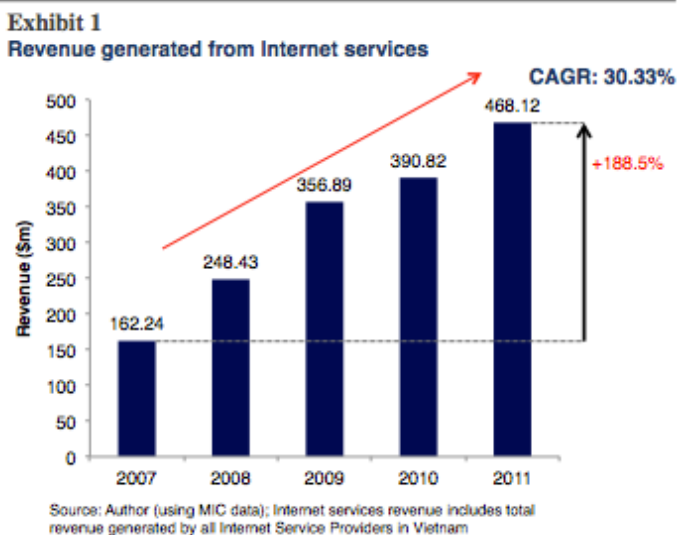
Background
Vietnam's developing ICT sector

Policymakers in Vietnam are currently grappling with their Internet governance policy changes, working to define an institutional landscape that also reflects the country's rapidly developing ICT sector. Since the Internet became accessible to the public in 1997 as part of the country's national ICT development strategy, Vietnam has seen the number of Internet users skyrocket.[1] In 2011, the country boasted more than 31 million domestic Internet users and a 31-percent Internet penetration rate, as shown in Exhibit 1 below.[2] Coupled with Vietnam's burgeoning economy, transportation, and communications sectors, it is no surprise that citizens are demanding high-speed Internet access as a crucial part of today's connected marketplace.

In response to this demand, the Vietnamese government has invested significantly in the country's broadband infrastructure, establishing the Ministry of Information and Communications in 2006 to spearhead development of this sector. The MIC is the main policymaking and regulatory body for all issues in Vietnam related to telecommunications, the Internet, information technology, and the management of related public services.[3] To support the MIC's mission going forward, Prime Minister Nguyen approved the government-wide Master Plan on Information and Technology in February 2011 with the goal of completing the following by 2020:

- Establishing broadband networks in all communes and wards nationwide;
- Ensuring wireless broadband coverage to 95 percent of the population; and
- Providing broadband access for 50 to 60 percent of households, of which 20 to 30 percent are to have access via fiber optic cable.[4]

To address the growing demand for digital technologies and applications, the government is modernizing the telecommunications infrastructure to meet international standards. According to the World Bank, the mobile phone penetration rate grew from 22.5 percent to 143.4 percent from 2006 to 2011, while the growth in Internet users as a percentage of population increased from 17.41 percent in 2006 to 35.45 percent in 2011. The ICT industry accordingly earned $13.7 billion in revenue by the end of 2011, more than double the 2010 figures.[5] Formally, the MIC lists nine state-owned Internet access providers (IAPs) and 15 licensed Internet service providers (ISPs).[6] In 2011, revenue generated by all the ISPs in Vietnam topped $468 million, an increase of over 180 percent since 2007.[7] Despite these successes, ICT infrastructure investment alone is not enough for Vietnam to optimize its ICT industry or to compete with its other ASEAN-6 neighbors in developing digital innovation. The ASEAN-6 consists of the six largest ASEAN economies, which includes Indonesia, Malaysia, the Philippines, Singapore, Thailand, and

Exhibit 1
Revenue generated from Internet services

CAGR: 30.33%

+188.5%

Source: Author (using MIC data); Internet services revenue includes total revenue generated by all Internet Service Providers in Vietnam

Vietnam. As the country emerges in the region with one of the highest Internet penetration rates, mobile penetration rates, and populations (third to Indonesia and the Philippines), policies aimed at encouraging more digital utilization should be encouraged to facilitate leadership in the digital space.

Accordingly, a 2012 report by Booz & Company on maximizing digitization found greater benefits associated with policy focusing on promoting usage of digital technologies and applications rather than simply focusing on the expansion of broadband access alone, as has been the case in the past. Specifically, the report found that countries at the most advanced stage of digitization derive 20 percent more in economic benefits than those at the initial stage.[8] This process of digitization, the mass adoption of connected ICT by consumers, businesses, and governments, necessarily depends on a more open Internet policy. Against Vietnam's backdrop of physical ICT development, the government has maintained a framework of stringent top-down state digital governance to alleviate concerns over information security, consequently resulting in the country being ranked as the lowest in the region in terms of Internet Freedom.

Exhibit 2
Despite a high mobile penetration rate, Vietnam ranks the lowest in the region (Singapore, Thailand, Indonesia, Malaysia, and the Philippines) for Internet freedom

Vietnam / Regional average

	Lowest	Highest
GDP (USD)	123.6 / 344.75	
GDP growth (%)	5.8 / 4	
GDP per capita (PPP, USD)	3,386 / 16,625	
Population (m)	89.5 / 88.1	
Internet penetration (%)	35 / 39.4	
Inflation rate (%)	18.6 / 4.2	
Mobile penetration rate (%)	144 / 116	
Freedom on the net rank (out of 100, with 100 denoting least free)	73 / 42.3	
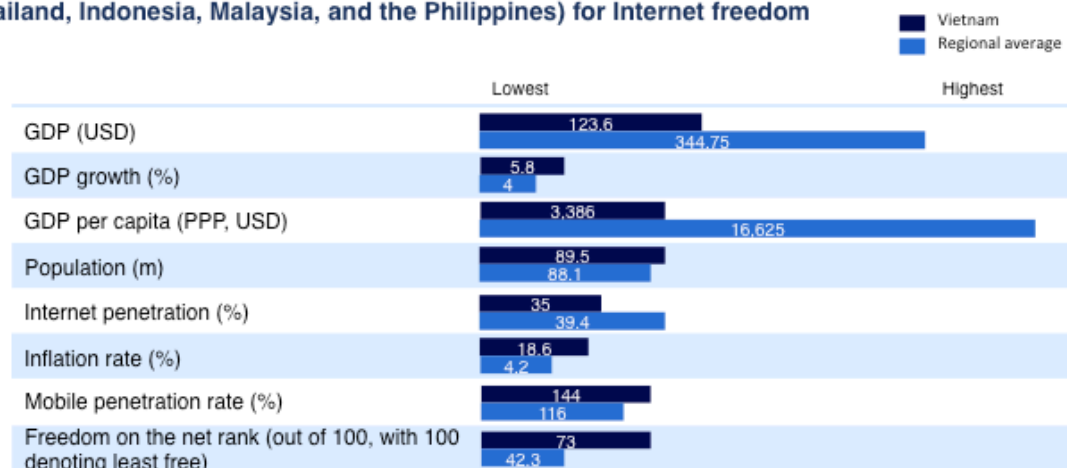
Source: Author (using World Bank and Economist Intelligence Unit data)

Internet content management and control

The government employs both legal and technological measures to manage the country's online content. The Vietnamese Communist Party (VCP) exercises this authority to control online content and access through editorial influence, filtering, censorship, and surveillance.[9] Political theory literature on Internet management suggests that the choices regimes make about how to treat the Internet are designed to "reinforce their broader strategies for retaining power," and that the VCP sets its ICT regulations with the motivations to serve its general political objectives.[10] These policies are reinforced in the government's ongoing policy changes embodied in the ICT Services and Internet Management decrees, which were still in the approval phase at the time of this report and will ultimately reinforce the government's information security framework. The Internet Management (or Management, Supply, and Use of Internet Services and Content Information Online) decree is an amendment to the preceding Decree 97 and will replace the older decree.

The Internet Management decree develops the regulatory framework for the management, provision, and use of all Internet services and electronic information on the Internet and, accordingly, applies to all organizations and individuals, foreign organizations, foreign individuals who are directly involved or related to the management, provision and use of Internet services and content online information in Vietnam. The policy changes highlighted in early drafts of the ICT Services and Internet Management decrees serve a number of purposes for the government. Namely, the ICT Services decree sets up the necessary physical infrastructure allowing the government to exert the desired amount of control over digital information, while the Internet Management decree provides the framework with which the government can enforce adherence to ICT policies. These decrees require online content to flow through various state actors under the Vietnamese Ministry of Public Security in the name of national security.[11] However, according to the versions of the decrees reviewed during this research, no clear guidelines are available for what content constitutes a threat to national interests. Ambiguity over permissible content thus raises significant concerns for those starting or growing their ICT business in the country. The OpenNet Initiative (ONI) reports pervasive filtering of political content; however, content related to social or conflict and security issues are filtered on a selective basis, and therefore permissibility is more difficult to assess.[12] Additionally, there are no channels for businesses or users to challenge content permissibility.

In addition to the increased capacity for digital control associated with these policy changes, these policies exert additional management over ICT companies within the country. An initial draft of Internet Management decree required all foreign multinational companies to maintain a physical presence in Vietnam and collect identifying information from users to submit to the MIC, if requested. This request from the earlier versions of the decree was met with concern by a number of multinational companies. Further, the decrees impose greater regulations on specific industries such as online gaming requiring online gaming companies to go through a more onerous permit process, which can considerably delay innovation in the online space.

Domestic Industry

Despite being a relative latecomer to the Internet space, Vietnamese local industry has quickly digitized traditional businesses and embraced innovation, experimentation, and imitation techniques.[13] However, several challenges remain in the digitizing process for domestic companies. E-commerce remains a stunted sector in the country due to factors including a weak banking system, low domestic credit card usage, online fraud concerns, and cultural distrust of online business-to-business and business-to-consumer sales. Although there are some popular local sites run by domestic companies, foreign websites like Facebook and Google rank high on Vietnam's most popularly visited pages.[14]

Though the intent of online content control is to manage domestic political discourse, the unintended consequence is inevitably the creation of a 'metaphorical tax' placed on business innovation, particularly domestic ICT startups. The challenge going forward for the Vietnamese government will be whether the country can successfully demonstrate the flexibility needed to amend its policy framework to embrace the Internet as a tool that helps spur economic activities and innovation.

Methodology
Identifying Development Barriers for Vietnamese ICT Startups

This research analyzes evaluations by Vietnamese ICT startup firms of the country's current Internet policies, including online content management and government support for startups, with analysis informed by primary and secondary data. For the purposes of this report, "ICT startup" is defined to include early stage firms that use the Internet as platform for providing a product or service.
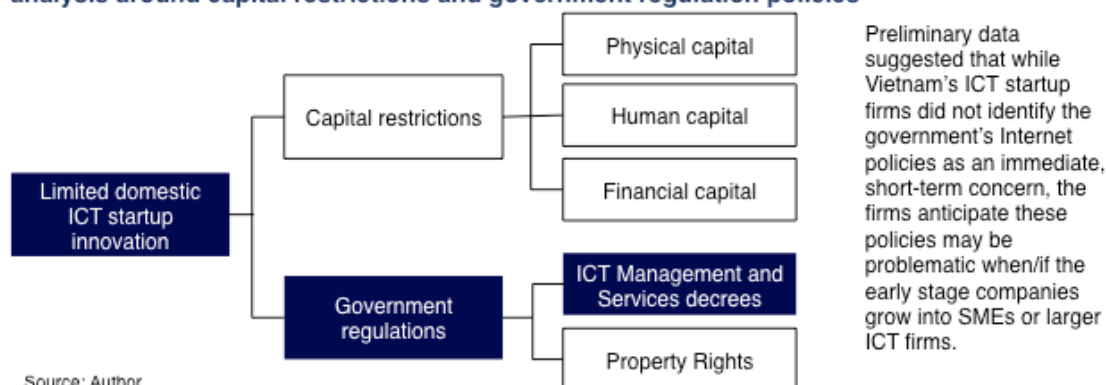
Exhibit 2 below outlines the analysis framework used to identify potential short- and long-term development barriers to digital innovation, such as UGC, for ICT startup firms. Based on a review of the Internet governance literature, potential innovative barriers included capital limitations as well as government Internet content management policies. We hypothesized that limited ICT startup innovation was directly correlated with Vietnam's Internet policies and that these policies focused on targeting Internet content over the development of the Vietnamese ICT startup community.

We met with 26 Vietnamese ICT business representatives from startup firms, SMEs, and large corporations in Vietnam during January 2013 (Appendix C). We also interviewed a number of other relevant stakeholders in Vietnam's Internet policy ecosystem including: U.S. ICT multinationals, representatives from the Vietnamese MIC, the U.S. State Department, and other relevant policy institutions. Additionally, we distributed an online survey to the startup community through channels such as Vietnamese startup Facebook and LinkedIn groups and individual entrepreneurs to which we were referred, receiving 59 total responses. In the survey, we asked Vietnamese startups to share their views on how current Internet policies impact the growth of entrepreneurship and business's digital innovative capacity (Appendix D). The anonymous survey provided a necessary complementary tool with which to solicit more candid feedback of the current Internet policy landscape from the ICT businesses.

Though the startups did not identify Internet policies as an immediate concern, and instead cited limited early stage capital as a primary innovative constraint, these firms did admit that Vietnam's Internet management policies presented a longer-term challenge. This notion was supported by responses from the larger tech-companies that believed domestic Internet policies placed them at a disadvantage relative to multinational firms. This report will draw lessons on how the country can build on its existing efforts.

Exhibit 3

To determine the primary constraints hindering domestic ICT startup innovation, we framed our analysis around capital restrictions and government regulation policies

Limited domestic ICT startup innovation

- Capital restrictions
  - Physical capital
  - Human capital
  - Financial capital
- Government regulations
  - ICT Management and Services decrees
  - Property Rights

Preliminary data suggested that while Vietnam's ICT startup firms did not identify the government's Internet policies as an immediate, short-term concern, the firms anticipate these policies may be problematic when/if the early stage companies grow into SMEs or larger ICT firms.

Source: Author

Regional Context
Supporting digital innovation as a strategy for competitiveness

In order to build on the country's existing strengths, Vietnamese policymakers should consider a more flexible approach to their ICT policy strategy, one that empowers domestic entrepreneurs and targets innovation and more sophisticated usage of digital technology over an exclusive focus on ICT infrastructure. To reach an optimal level of digital development, the Boston Consulting Group argues in its 2012 e-Intensity Report that governments must embrace an "adaptive style of development" that emphasizes adjustment and experimentation.[15] This section explores the development strategies of the country's remaining ASEAN-6 neighbors, namely Singapore, Thailand, Malaysia, Indonesia, and the Philippines, as a benchmark for Vietnam to build on its core competencies.
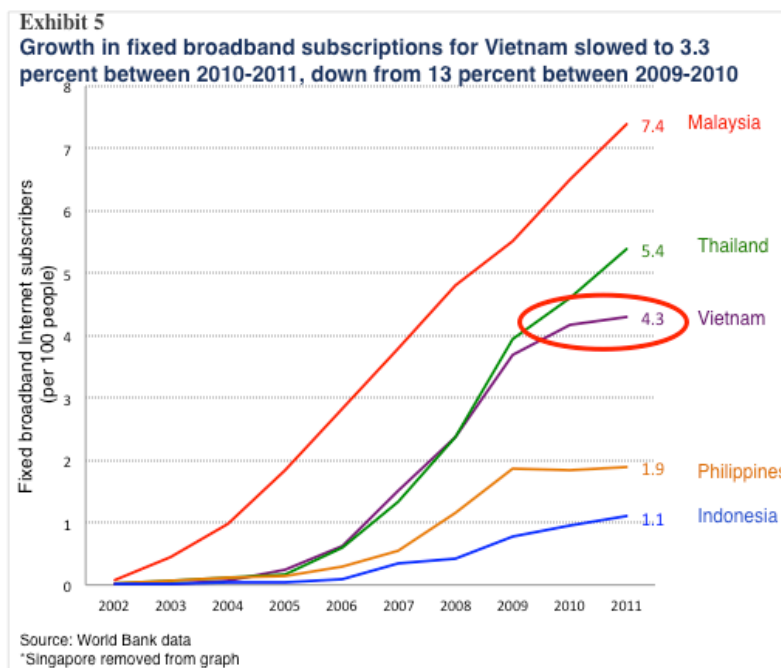
Although Internet management practices across these countries vary in both scale and range, Vietnam continues to maintain the most pervasive forms of Internet and communications filtering. According to the Freedom House's Freedom on the Net scoreboard, Vietnam ranks the lowest relative to its ASEAN-6 neighbors, with a score of 73 out of 100 (where 100 indicates the least free) that places the country in the "Not Free" category. While Thailand is also included in this "Not Free" category, with a score of 63, the country still ranks more favorably than Vietnam. Malaysia, Indonesia, and the Philippines subsequently follow with scores of 43, 42, and 23, respectively. Additionally, although Singapore did not receive a Freedom on the Net scored by Freedom House, based on the country's Partly Free categorization (Appendix B) and review of other Singapore governance reports such as from ONI, we conjecture that Singapore would still rank better than Vietnam for Internet freedom.[16]

As the region moves towards increased Internet connectivity that now leverages social media and other UGC platforms, Vietnam's neighbors have taken multifaceted approaches to enhancing their ICT competitiveness through reassessing their Internet governance policies. Indeed, Singapore recognized the correlational link between filtering of online content and levels of investment for innovation as early as 1997, and has subsequently reshaped its Internet content management policies to encourage homegrown innovation from early stage businesses while also attracting foreign investment.[17] Some programs offered by the Singaporean government to nurture the ICT sector include tax incentives, business incubator schemes, cash grants, and debt and equity financing options, and the country has been recognized as one of the "best new global cities for startups."[18] Singapore has complemented its efforts at developing a favorable environment for innovation with online content management policies that allow for utilization of UGC, namely ones that minimize Internet filtering. As the first of the ASEAN-6 to formally establish Internet connection in 1992, Singapore has supported greater clarity in the government's Internet content management policies, categorizing and specifying what it

Exhibit 4 | Southeast Asia Regional Map

Source: PwC

considers permissible content. ONI ranks the country as "high" for transparency and consistency of content management.[19]

Thailand, despite scoring quite low on the Freedom on the Net report, has been able to figure out a way to live with its *lèse majesté* law without stymying a vibrant domestic Internet ecosystem. The Thai government has accomplished this by only specifically blocking a content page deemed offensive to the monarchy, rather than the entire website. Thailand maintains a robust social media community, and Thais are among the most active Facebook users in the world with Thailand ranking the 13th highest in absolute number of monthly active Facebook users. Thailand also has the second highest Facebook penetration of online population in the region with a rate of 127 percent, second to Indonesia's 203 percent penetration rate.[20] Such a vibrant UGC community is complemented by a continued increase in access to broadband Internet. In fact, the number of fixed broadband subscriptions per 100 people in Thailand overtook that of Vietnam in 2008 (Exhibit 5). While Vietnam's rate slowed to 3.3 percent between 2010 and 2011, Thailand and Malaysia maintained rates of 16.7 percent and 14.5 percent, respectively.

Exhibit 5
Growth in fixed broadband subscriptions for Vietnam slowed to 3.3 percent between 2010-2011, down from 13 percent between 2009-2010

Source: World Bank data
*Singapore removed from graph

Despite backtracking in 2008 from its 1998 pledge to curb censorship activities, the government of Malaysia has been progressive on other fronts. For more than a decade, Malaysia has sustained Cyberjava, a town that aspires to develop as the country's Silicon Valley.[21] Currently, Cyberjava has more than 700 companies and 35 multinationals operating in the city. The government has drafted plans to build more housing units in addition to a new city center in efforts to attract more talent into the city.[22] Another constructive example of the Malaysian government's effort to spur its ICT sector includes the Malaysian Prime Minister's increasing usage of Web 2.0 to engage his electorate. In 2011, he invited the 'netizens' to provide suggestions on the proposed national budget via his blog, optimizing on UGC platforms to encourage domestic engagement in national policymaking and support internal stability. Thousands of Malaysian citizens provided their responses to the Prime Minister's request.[23]

Similar to Thailand, Indonesia maintains a vibrant social network scene. Accenture reports that daily social media usage among Indonesian Internet users grew from 14 percent of Internet users in 2010 to 65 percent in 2011.[24] The country's sheer population size of over 240 million and its relative stability as a democratic country has turned Indonesia into an attractive investment destination for foreign companies including those in the ICT sector. The country has come a long way from the authoritarian rule of President Suharto and is emerging as a free society. However, Indonesia suffers from low penetration of

high-speed Internet access, with only 1.13 fixed broadband Internet subscribers per 100 people.[25] This lack of fixed broadband infrastructure is partially being compensated by the growth in the use of wireless broadband. According to IDC, Indonesia "is witnessing all the makings of a society with a high propensity to adopt mobile broadband due to the demand in content, social media applications and connectivity."[26] However, the uploading and downloading of more sophisticated content such as YouTube videos still require a better penetration of high-speed fixed, wired broadband. The future of the ICT sector in Indonesia will rest on building adequate infrastructure to expand such access for its citizens.

The Philippines is similar to Indonesia in that Internet content management is not a barrier to the development of its ICT sector. However, the Philippines continues to be plagued by a lack of investment in adequate infrastructure to support the growth of sophisticated Internet usage, with merely 1.89 fixed broadband Internet subscribers per 100 people.[27] Despite a lack of adequate infrastructure for the country, major cities in the Philippines are becoming attractive destinations for foreign firms' outsourcing of call centers because Filipinos tend to have a good command of the English language. In fact, in 2013, Manila was ranked third, behind Bangalore and Mumbai, and Cebu City was ranked eighth in the top 100 ranking of global outsourcing destinations, a report released by Tholons, a US-based consulting firm for global outsourcing.[28]

While policymakers in these countries face similar challenges in balancing rapid development of the ICT sectors and ensuring national stability, these tensions have manifested themselves differently for each country. Some countries have been more successful in developing competitiveness strategies based on policies supporting Internet freedom and domestic ICT startup firms. The countries that appear to be doing well, namely Singapore and Thailand, are able to maintain political stability while allowing their ICT sectors, both in terms of hard infrastructure investment and content development, grow. It is important to note the phenomenon of greater UGC utilization in Vietnam's neighboring countries. According to the OECD, economic benefits linked to UGC platforms include the entry of new firms into the market and employment. Additionally, the OECD determined a correlational link between UGC platforms and an increased demand by users for the necessary infrastructure to support these platforms, including greater broadband access, higher speed Internet, and mobile broadband.[29] It is crucial that Vietnam recognizes this link. The VCP has focused heavily on investment in hard infrastructure. By 2020, it wants 60 percent of the Vietnamese to have access to high-speed broadband.[30] However, Vietnam's growth of fixed broadband subscribers has slowed down in recent years. This could be due to the fact that capacity for broadband has exceeded demand by the citizens. To ensure that Vietnam maintain a competitive ICT sector, it is more important for Vietnam to focus on digital content development, success of which rests upon relaxing Internet content control and nurturing a vibrant UGC community, rather than solely focusing on investment in hard infrastructure.

Findings

As Vietnam deliberates the future direction of its Internet policy, particularly those regarding ICT services and Internet content management, it is vital for the government to understand barriers to growth as identified by the stakeholders in the country's Internet ecosystem. Primary and secondary source analysis revealed the following key findings on factors inhibiting domestic ICT industry innovation in both the short- and long-term:

- Primary, initial barriers to Vietnamese ICT startup innovation stems from capital constraints;
- Startups anticipate Internet regulatory policy will have greater long-term impacts on business performance;
- Government financial support to ICT startups is nonexistent based on in-country interviews;
- The majority of surveyed participants—87 percent—are not aware of any government-sponsored programs to support Vietnamese ICT entrepreneurs;
- Increased Internet content management may encourage more risk-averse behavior in startups with, or, considering utilizing UGC and social network platforms according to survey results; and
- SMEs and large ICT companies believe current Internet regulatory policy is detrimental to the development of digital innovation capacity.

However, the final impact of the policy changes remains unclear as the decree was going through several rounds of revisions at the time of this report. These findings are detailed below.

Financial Constraints for Vietnamese Online Startups

According to this research, constraints related to finance are the most serious concern to Vietnamese Internet startup firms. Specifically, these businesses identified limited sources of startup funding along with low level of credit card and banking usage as the main factors hindering innovation among online startup businesses in the short-term. These companies reported that the Internet regulatory environment, including licensing, taxing, content control, and filtering did not play a significant role in their short-term daily business operations concerns. However, it is important to note that these startups anticipated that regulations would become a longer-term concern for their business functions as their companies begin generating profit.

Based on interviews with select Vietnamese startup firms, startups also identify a lack of finance, measured by ease of access to loans, as an important constraint. Sixty-seven percent of the surveyed firms received funding through venture capital firms and the rest, 33 percent, received either private bank loans or used their own personal savings. The main sources of funding considered by the businesses include: venture capital, private bank loans, personal saving and government bank loans, among others.[31] Importantly, even though Vietnam has 5 state-owned banks that do offer business loans, none of the startups in our survey secured funding through this channel. Moreover, the companies we surveyed unanimously agree that the government should provide loan opportunities for early stage ICT companies, either through state-owned banks, or government grants programs. However, they point to the important of evaluating the conditions that would be associated with government's funding.

Low level of credit card and banking system usage is another major financial constraint facing online startups. About 70 percent of the population lives outside the major cities, with only 8 percent of that non-

urban population using any sort of formal financial services. Only 1 percent of the population uses credit cards, and only 42 percent are aware of credit card services. Besides this, even among the consumers who are aware of credit card services, 18 percent find it inconvenient to use, while 36 percent do not see a need for such services and about 19 percent lack the knowledge about how such service work.[32] Therefore, the lack of a strong financial system, i.e. low use of financial products by consumers, is an important constraint for online startup companies, as they cannot easily tap into potential consumers' resources to generate revenue for their businesses. The startups we surveyed indicated that the limited options to generating revenue have negatively affected their innovation to capitalize on the growing online customer base, particularly in the e-commerce sector where sophisticated transaction platform is required. To circumvent this constraint, some startups have embraced a Cash On Delivery (COD) approach. Regardless, the COD approach has many limitations. For example, COD has higher transaction costs compared to an e-payment system particularly when goods are returned because firms would need to manually return the money back to those consumers. COD is also problematic when online services, or intangible Internet applications, instead of goods, are purchased. A COD model for online sale of non-good means that there has to be a major delay between the time of purchase and the time the time service is granted. This is in contrast to the Internet ecosystem where e-payment is commonplace, which enables services to be rendered immediately at the time of purchase. Thus, a COD transaction for services adds unnecessary complexity to the transaction that should in theory be easy and fast.

Internet Governance Policy as a Barrier to Online Business Innovation

At the time of writing, the draft version of the Internet Management decree required ICT firms with online content to maintain full Internet content monitoring services (Article 5, 4c). This stipulation, if finally adopted, would amplify concerns over potential policy change with existing financial constraints. Consequently, this would increase financial burdens on ICT firms, and would be especially exhaustive for early stage companies. The financial resources diverted to self-monitoring of content could be detrimental to investment in innovation on newer digital platforms utilizing UGC and social networks. Some of the startup companies, which include or plan to include UGC platforms on their websites, expressed concern with the increased expenses associated with installing more robust self-monitoring technologies. These early-stage companies may not have the financial and technical resources available to keep up with increasing monitoring costs. Seventy-one percent of the surveyed firms noted their dissatisfaction (ranging from "Very Dissatisfied" to "Somewhat Dissatisfied") with the current government policies on Internet content management. Based on these initial assessments, this report expects that the policy change mandating firms to ramp up their content control capabilities will discourage startup firms from incorporating UGC in their products and services. This may have the effect of hampering the potential for homegrown innovation in the space of Vietnamese digital media.

Furthermore, of the firms surveyed, even those that did not claim the potential increased self-monitoring policy change would divert financial resources away from building UGC capability did express "concerns with government Internet content regulation" as a main barrier limiting greater incorporation of UGC into Vietnamese websites. In fact, 72 percent of the firms surveyed identified government Internet regulation as the main barrier for their decision to not adopt UGC capability in their platforms. In other words, while these firms were less concerned about having financial resources being diverted towards strengthening

their content control departments, they still viewed the potential policy changes as detrimental to the future of digital innovation towards UGC platforms in Vietnam. The interviewed domestic SMEs and larger corporations echoed this sentiment as well, citing that businesses in neighboring countries such as Thailand are able to utilize UGC platforms with much less interference from the government. One example of this can be seen with the Thai government approach of selective rather than pervasive filtering. Instead of blocking at the domain name system (DNS) level as done in Vietnam, the Thai government instead blocks specific content, such as select YouTube videos rather than the entire site itself.

This investment towards greater expansion of UGC platforms by domestic industry is likely to see benefits in other areas that contribute to positive development of Vietnam's Internet ecosystem. The OECD has reported that there is a correlational link between the growth in both domestic supply and demand of UGC components of the local online industry and the investment in Internet infrastructure. The OECD pointed out that in countries where users become more engaged in UGC platforms, there would be a greater demand by domestic users for faster-speed Internet infrastructure that supports more efficient usage of these platforms. This is an important driver for investment by the telecommunications industry and other infrastructure providers. According to the OECD study, "the impacts on network performance and investment in each market will depend on specific usage patterns, technical choices, and business decisions. The robustness of the Internet and associated digital networks will become an increasingly significant consideration as greater percentages of content and user activity flow over them."[33] Extrapolating this documented global trend to Vietnam, a robust UGC Internet community will likely generate more investment into new and advanced infrastructure. This is especially important in the case of Vietnam in light of the significant slowdown in the growth of fixed broadband access in the country since 2009 (Exhibit 5).[34]

The SMEs and large corporations interviewed for this project also identified additional concerns with the policy changes associated with the Internet Management decree version may have on their digital business development. Two key concerns that emerged out of the decree version reviewed include: 1) the ambiguity over definition of content that constitute threats to national security and subject to content control; and 2) the pervasiveness of the content control imposed by potential policy changes.

Earlier drafts of the decree included articles stating that individuals are subject to legal action if they are "abusing the provision and use of the Internet and information on the web to oppose the Socialist Republic of Vietnam," "undermining the grand unity of all people," or "undermining the fine customs and traditions of the nation."[35] More problematically, these ambiguous phrases are highly subjective, with no elaboration on what type of content is permissible under these guidelines appearing anywhere in the document. The policy changes also included a requirement for companies to filter any online content regarded by the government as "prohibited acts." Not only are users themselves held accountable to make sure that any circulated information does not contain prohibited content, but Internet companies are also required to self-monitor and remove content deemed inappropriate by the authorities. This prevalent theme of increased government management of online content and the lack of definitive information on determining the prohibitive status of online content not only generates uncertainty among online businesses, but also among Vietnamese end users.

Despite efforts by the Vietnamese government to control for stability within the country, the vague nature of current Internet governance policies creates a negative externality on domestic ICT business innovation. The vagueness is interpreted as an intended mechanism by, the state to interpret the clauses of the decree in the way that suits its political interest. As a result, firms in the digital domains must be particularly careful with how they operate their businesses. Even though some businesses might have the resources to install more robust content control capabilities, as firms become more risk-averse with the subjective and sometimes seemingly arbitrary content control measures, introduction of new UGC components is expected to be limited. This in turn might hamper innovation within the industry, as the public becomes only a recipient of the Internet content rather than both a recipient and contributor.

Furthermore, the pervasive and stringent nature of these policy changes as interpreted by businesses has led even foreign Internet companies to question the sincerity of the Vietnamese government in nurturing the online business industry. An early draft of the Internet Management decree required all foreign multinational companies operating in Vietnam to collaborate with the authorities in filtering and eliminating any prohibited information. The same version stipulated that multinationals might potentially be required to house their servers within the country and require Internet users to register using their real names online. Such policy positions from the government prove particularly concerning to foreign firms because they override the notion of Internet freedom. Increased Internet freedoms and online governance transparency not only embody these firms' core operating values, but also are directly linked to business profitability and innovation within the industry.

These foreign multinational companies are crucial to the growth of the Internet industry in Vietnam. They bring in new technologies and enable local players to build off existing platforms. Unlike China, whose market power and size has allowed the country to subject foreign companies to the Chinese government's Internet governance rules, the Vietnamese government might have less to gain in its attempts to control the Internet space. It is likely that these foreign multinationals would continue to advocate for Internet freedom as part of their operating models. The Vietnamese government's actions contradicting these efforts could lead to foreign firms pulling of the country, which would be detrimental to the viability of local Internet industry and consequently close doors to viable partnerships that can align with Vietnam's strategic development goals.

Final Impacts of Potential Policy Changes Remain Unclear

We evaluated these policy changes based on the version of the draft Internet Management decree provided at the time of the research. Although these particular stipulations may be removed in the final approved version of the decree, there is an equal possibility that more stringent stipulations may be inserted into the decree. The eventual impacts of the Internet Management decree remain unclear at the time of this writing. As of March 20, 2013, the Internet management decree was still in phase 4 of the approval process as can be seen below in Exhibit 9.

MIC drafted the initial decree, Version 1.0, and opened the document for a 60-day public commentary period. During this time, any citizen or entity, whether Vietnamese or foreign, could review the decree and provide comments and suggestions on the regulatory document to the MIC. During our research in

Vietnam, the MIC representatives we spoke with candidly admitted the initial backlash towards certain sections of the documents. Once this public commentary closed, the MIC revised the decree once again and published the version 2.0. This version of the decree was then sent to other ministries and entities, during which further comments were collected. The version 3.0 was then published after this re-revision. Following this phase, the decree was then submitted to the Office of the Government. Version 4.0 was then published, after which it was sent to the Minister for final sign off. The final version that the Minister approves will be the decree version 5.0.

Exhibit 9
Internet Management Decree development and current status

Phase	Description
Version 1.0	Decree Version 1.0 drafted by MIC. Version 1.0 open for public comment from stakeholders such as the U.S. Embassy and American Chamber of Commerce (60 days)
Version 2.0	Decree Version 2.0 sent out to other relevant ministries and entities as well as foreign and local business associations
Version 3.0	Decree Version 3.0 submitted to office of the government for post-review process
Version 4.0	Internet Management decree in phase 4 of ratification process at time of this report. Phase 4 is a review, rather than drafting, phase. Therefore, the decree at this phase is closed to further content additions ← As of 3/2013
Version 5.0	During phase 5, the decree will be ready to submit to the government for voting. Decree 97 will be ratified if a 50 percent majority vote is achieved

At the time of writing this report, the Internet Management decree was in Phase 4 of the approval process.

Source: Author (using MIC information)

Recommendations

Based on the our review of how Vietnam's neighbors approach the issue of Internet governance and findings through interviews and surveys with Vietnamese ICT entrepreneurs, it is clear that Vietnam should reevaluate the country's status quo scenario for the Internet industry in order for the country to remain digitally competitive. Included below are recommendations that specifically target key players, including online startup firms, SMEs and large corporations (established corporations), and the Vietnamese government, in Vietnam's Internet space.

Startup Firms

- *Engage in Internet policy discussion.* Although the startup firms interviewed indicated financial constraints as the most immediate concern for their operations, these business representatives also claimed that the Vietnamese government's content control policies have slowed the incorporation of UGC components into their business models. In order to ensure that the government's policies are conducive to the growth of their businesses, both in terms of alleviating financial constraints and promoting the use of UGC, it is imperative that startups see value in engaging in policy dialogues with the government, especially the MIC.

- *Establish formal trade association.* As they engage with the government, startup firms can increase their leverage through collectively channeling their concerns. One such way to do this is to establish a formal trade association among the startups. Although networks of startup firms exist, these are not formalized and rarely engage with policymakers. For example, a Facebook group linking the startup community in Vietnam has over 6,500 individual members, and a LinkedIn group of similar purpose has more than 750 members. Another more formal networking group, The START Network, focuses on channeling best practices and helping startups secure funding. This organization does not engage in policy discussions with the government. However, these social network groups and existing networking platforms should serve as a starting point for early stage firms to build formal alliances that can increase their bargaining power with the government. Such a formal network would have delegated representatives that engage the government on the members' behalf, thereby protecting individual companies from facing potential ramifications by the government. Ultimately, the trade association would serve to lobby the government to change and implement policies that are conducive to the growth of Internet business.

- *Collectively lobby for government-sponsored support for ICT entrepreneurs.* Once formed, the trade association can lobby the government to encourage state-owned banks to provide low-interest financial loans or the MIC to provide grants as an alternative source of finance to ICT startups. No survey respondents indicated that they have received funding from state-owned banks nor were any aware of government grant programs for startups. Other programs that the trade group could help lobby for include tax incentives, government-sponsored incubators, government-backed equity financing schemes, and debt financing schemes, among others. A collective bargaining power would increase the likelihood of successful requests, which could help address part of the financial constraints faced by startups.

- *Collectively lobby for a more open Internet.* Another potential constraint faced by startups is the concern over the costliness of building a robust content control capability as required by Vietnam's policy changes, instead of spending these resources to grow their businesses. To overcome this, the startup community, through their trade association representative, should lobby for more open Internet governance policies, thus limiting the diversion of financial resources away from innovation. A more open Internet would encourage increased active participation among the 'netizens', adoption of UGC, and greater investment in advanced infrastructure to support demands for usage and speed.

Established Corporations

- *Build strong network with startup firms.* The successes of both startup firms and more established firms are mutually reinforcing. Many startup firms' exit strategies include being bought out by established firms, rather than growing into independent larger firms. A robust ICT startup scene contributes to innovation and diversification of Internet usage, thus driving up Internet activity that translates into increased revenues for the entire ecosystem. On the other hand, SMEs' and large corporations' concern over the government's Internet policy and demand for more open Internet directly plays a role in startups' likelihood of incorporating UGC components into their business models. The lack of engagement between the two communities is evident by the fact that large corporations dominate the membership of the Vietnam Internet Association (VIA), a formal grouping representing the Internet industry. However, it is not certain that startups' interests are

represented by the VIA. Furthermore, conferences for startups have rarely received sponsorships from large corporations. For example, The START Network, which is geared towards sharing best practices and securing finance, has only received sponsorships from the World Bank and academic institutions. This presents larger firms with an opportunity to build a stronger network with startup firms based on mutually aligned interests.

- *Focus on nurturing UGC and innovation rather than on Internet infrastructure.* The government aims to expand broadband access to 70 percent of the nation by 2020.[36] Telecommunications companies—many of them state-owned enterprises (SOEs)—are poised to respond to this ambitious goal. However, more investment into hard infrastructure does not necessarily mean that Vietnam could reap maximum benefits enabled by higher speed Internet access without a corresponding increase in bandwidth demand. Telecommunication companies should focus on nurturing an Internet ecosystem that encourages more UGC, thus leading to more demand for faster Internet. For example, telecommunication companies in Thailand, such as AIS and DTAC, have sponsored business case competition programs for startups. Viettel and VinaPhone can offer similar programs that could help nurture innovation in the Internet industry. Ultimately, this would ensure that investment into expanding broadband access is capitalized on by increased users' demand for bandwidth, leading to sound economic returns for the companies making such investments. It is also important that these companies convey their concern over how pending policy changes could slow down the growth of UGC community and hamper innovation to the government. They must push for more pro-UGC policies in order to justify more investments in advanced infrastructure.

Government

- *Promote ecosystem mentality.* The government, spearheaded by the MIC, should encourage Internet policy dialogue with all stakeholders, especially with the domestic ICT startup community. This dialogue should also highlight opportunities for the ICT startup community to work together with the government in advancing the country's ICT development goals. As listed under the findings section, virtually all survey respondents expressed dissatisfaction with what they have identified as a lack of effort from the government to engage with the startup community. While Internet regulations are not the primary constraint for startup companies' business operations, it is essential that such firms engage in Internet policy dialogues with the government. This will carve a space for these firms as integral stakeholders in Vietnam's formulation of future Internet governance policies, particularly if these startups grow into SME or large corporations. Although opening the Internet Management decree for public commentary during Phase 1 of the decree's development is one such gesture, this effort falls short of the intended goal of gaining ecosystem-wide suggestions and support. Since the public cannot remain appraised of the development process, stakeholders are not provided with updates on which suggestions are incorporated or even discussed. Holding more frequent roundtables between MIC representatives and the public regarding the status of the pending decree is one such way to address this shortcoming.

- *Launch programs to alleviate identified constraints.* Other governments in the region are already strengthening their policy efforts to target increased user application of new digital technologies through programs supporting entrepreneurism. Singapore, for example, has a comprehensive approach to draw investment into its ICT sector and implement programs to ensure a vibrant IT startup scene. The Singaporean government provides tax exemptions, equity financing schemes,

cash grants, debt financing options, and business incubator resources for domestic startups. These resources are administered by multiple government agencies, allowing startups to select the resources that best suit for their business models. For example, an agency under Singapore's Ministry of Trade and Industry provides seed funding and co-invests in commercially viable startups, whereas its National Research Foundation runs a business incubator scheme that also offers up to 85-percent co-funding. Vietnam can draw lessons from the success of Singapore in growing small domestic startups.

- *Understand that investment in infrastructure is inextricably linked to Internet Openness and a robust UGC industry.* In order to encourage firms to invest more in hard infrastructure, the government must relax its control on the Internet and nurture a robust UGC industry. When there is an increase in demand for faster Internet bandwidth, the private sector or the SOEs would naturally see market opportunities to invest in an expanding broadband network. Simply pushing the telecommunications companies to expand broadband Internet access without a real increase in demand could be detrimental not only to the viability of these companies, but also to the overall economic prosperity of Vietnam. This characterizes a suboptimal capitalization of technology. Vietnam's experience with the collapse with Vinashin, a state-run shipbuilding company, should serve as an important legacy for the VCP. Vinashin was launched to mark Vietnam's foray into the heavy industry and failed partially because of a mismatch between capacity and demand.[37] This was due to the fact that the company was run as part of a state apparatus, guided by the impulse of the country's leadership rather than on sound business rationale. The ICT sector, particularly the state-owned telecommunications companies, in Vietnam could follow the same fate as Vinashin if the Vietnamese government continues to implement anti-internet freedom policies that limit UGC activities and hamper innovation, resulting in a mismatch between infrastructure capacity and Internet usage demand.

- *Articulate Clear, Consistent Internet Governance Policies.* Current Internet governance policies controlling for Internet content and surveillance are sending unclear messages to stakeholders in the domestic Internet ecosystem. For Vietnam to realize its vision to develop Vietnam's ICT space as charted by Prime Minister Nguyen in the country's Master Plan for IT, it is essential that the government develops and implements consistent ICT laws. Addressing the vague language, especially the language present in the current Internet Management decree will allow both the domestic industry as well as MNCs to understand the limitations of their product or service development. Singapore, for example, has been clear in its definition of what constitutes "prohibited acts." Thailand, on the other hand, has been more targeted in blocking a specific Internet content, rather than the whole website. For example, the Thai government has opted to block a specific YouTube video deemed offensive to its King, while users can still stream other YouTube videos online.

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FREEDOM ON THE NET 2012
A GLOBAL ASSESSMENT OF INTERNET AND DIGITAL MEDIA

FREE   PARTLY FREE   NOT FREE   NO DATA

APPENDIX B – Sample Interview Questions

######## seems to be the Linkedin of Vietnam and therefore has embraced a business plan based on social networking and UGC space.

- How did you obtain all the regulatory information regarding perhaps permit/licenses for the company initially? Is there is a centralized location or database that you use?

- Are you familiar with the Hoa Lac Hi Tech Park, the Vietnamese government's incubator in Hanoi? Do you think that having such science parks will help online start up company such as yours? What kind of efforts do you see from the government to support ICT startups?

- Do you make use of e-commerce at #######? If yes, could you please tell us the challenges for e-commerce development in Vietnam? (Also ask for trends in e-commerce)

- If there is one regulation that you would like to see change, what would that be? How could that help the social network or UGC content aspect of your business?

- What particular factors in the Vietnamese Internet ecosystem led you to create ##### when you did? What factors have helped support growth of the organization?

- Are there specific Internet policies you find most relevant to your online business startup?

- What are the scale-up prospects for your business model, and what factors do you foresee hindering the ability to further develop the social network and UGC component of your model?

- Two legal frameworks related to Internet that we have looked at include the 1) ICT Services decree and 2) the Internet Management decree which regulate online content. Has ##### been involved in policy discussion with the government of Vietnam or other members of the business community related to these decrees?

HARVARD
UNIVERSITY

English ▼

Thank you for your interest in our Harvard Vietnam Research project focused on **Digital Innovation in Vietnam's Information and Communications Technology (ICT) Industry.** We greatly value your background as a Vietnamese ICT entrepreneur and wanted to provide you with an opportunity to reflect on your Vietnamese startup experiences. This research explores business evaluations of Vietnam's current Internet policies including online content management and governmental support for startups. The research also examines barriers to increased innovation, such as a wider adoption of User-Generated Data applications, among Vietnamese online business startups.

We anticipate the below variables impact innovation levels among startups. To help us assess the *extent* to which these factors affect innovation potential, please feel free to include your thoughts in the comment box provided if necessary.

We would appreciate your feedback by **April 10, 2013**. Thank you for your thoughts!

Question 1: Do you have ICT startup experience in Vietnam?

○ Yes
○ No

Question 2: Are you aware of government-sponsored programs to support Vietnamese ICT entrepreneurs?

○ Yes
○ No

If you answered YES to question 2, please name some of the government-sponsored programs with which you are familiar:

[ ]

Question 3: If a government policy to provide grants and loans to early stage ICT companies was available, would you take advantage of these resources?

☐ Yes, I believe this is a good idea and the government should offer more similar opportunities
☐ No, I do not need these resources because I already have alternative resources available (i.e. finances)
☐ No, I do not believe these resources could be effectively implemented
☐ Other
[ ]

Question 4: On a scale from -3 to 3, how much has current government policy on Internet content control (e.g. content management, restriction, etc) impacted the development of your online business? Please rate based on your experience. (-3 indicates the most negative impact, 0 indicates no impact, and 3 indicaties the most positive impact.)

-3	-2	-1	0	1	2	3
○	○	○	○	○	○	○

20

Question 5: On a scale from 0 to 3, how engaged do you feel you are in Vietnam's Internet policy discussions? For instance, have you participated in any government-hosted dialogue on the country's Internet policy changes or do you follow relevant changes in the country's Internet policies? (0 indicates no engagement and 3 indicaties the most possible engagement.)

0	1	2	3
(No Engagement)	(Limited Engagement)	(Active Engagement)	(Very Active Engagement)
○	○	○	○

Question 6: If you indicated no or limited engagement (i.e. 0 or 1) in the previous question, which statements below most closely indicate your primary reasons for not engaging in the country's Internet policy discussions? Please check all that apply.

- ☐ My opinion will not influence government policy.
- ☐ No framework or opportunity exists for me to engage with the government in Internet policy dialogue.
- ☐ An official framework and opportunity for policy engagement exists, but there is no follow through from the government with existing programs.
- ☐ Engaging in policy discussions is not a cultural norm in Vietnam.
- ☐ I don't see the relevance in doing so. (It would not have any impact on my business anyway)
- ☐ Please specify other reasons:

Question 7: Based on your business experience, how satisfied do you feel with current government policy on *Internet content management?*

- ○ Very Dissatisfied
- ○ Dissatisfied
- ○ Somewhat Dissatisfied
- ○ Neutral (No opinion)
- ○ Somewhat Satisfied
- ○ Satisfied
- ○ Very Satisfied

Question 8: Based on your business experience, how satisfied do you feel with current government policy on *supporting online startup businesses?*

- ○ Very Dissatisfied
- ○ Dissatisfied
- ○ Somewhat Dissatisfed
- ○ Neutral (no opinion)
- ○ Somewhat Satisfied
- ○ Satisfied
- ○ Very Satisfied

Question 9: Is there a user-generated content (UGC) component of your business website? (UGC includes any platform where users can post content online such as youtube, twitter, facebook, zing, web boards, online dating websites, etc.)

- ☐ Yes
- ☐ No
- ☐ Comments

If you answered NO to question 8, are you considering including a UGC component in the future?

- ☐ Yes
- ☐ No
- ☐ Comments

[   ]

Question 10: In your opinion, what are the main barriers limiting greater incorporation of UGC into Vietnamese websites? Please check all that apply.
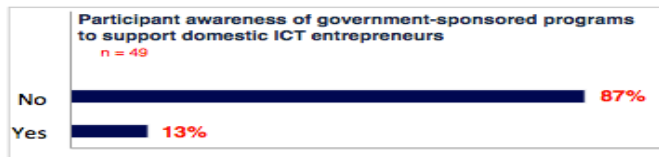
- ☐ There are NOT any barriers limiting incorporation of UGC into Vietnamese websites
- ☐ Concerns with government Internet content regulation
- ☐ Technical design complications and difficulties (supply side challenges)
- ☐ No demand for user-generated content platforms (where users can post content online)
- ☐ Too much competition from foreign companies operating in Vietnam
- ☐ Effort to not draw unnecessary attention to myself
- ☐ Please specify other reasons:

[   ]

Question 11: What are the top 5 UGC websites that you visit? Please indicate whether this is a Vietnamese or foreign website, e.g. Facebook (foreign), Zing (Vietnamese), etc.

- ☐ Website 1:
  [   ]
- ☐ Website 2:
  [   ]
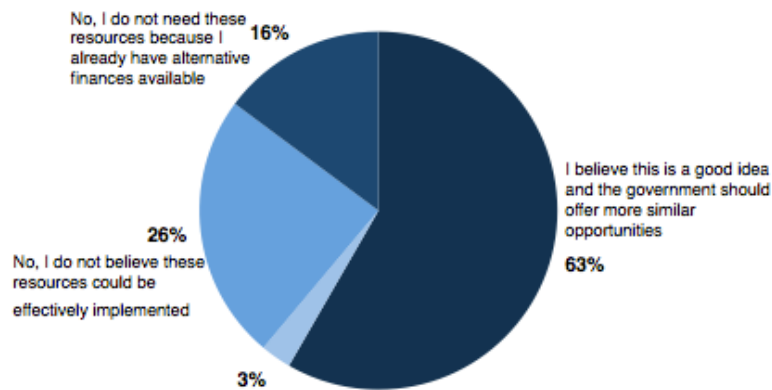- ☐ Website 3:
  [   ]
- ☐ Website 4:
  [   ]
- ☐ Website 5:
  [   ]

Question 12: Please use the space below for any additional comments you would like to share.

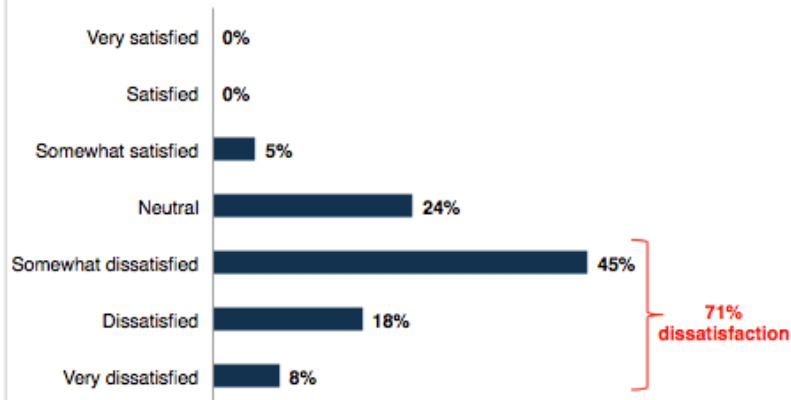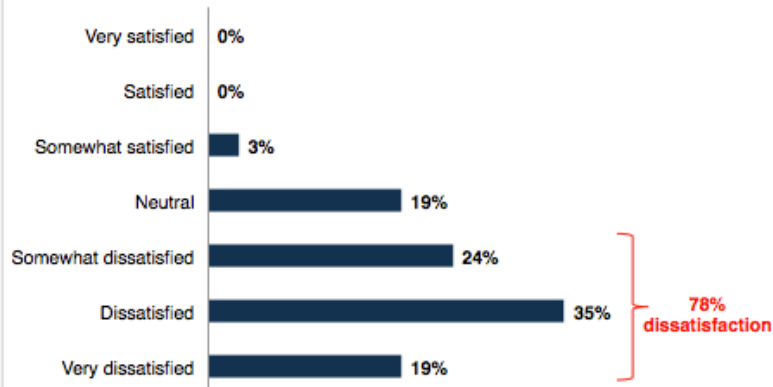[   ]

Participant awareness of government-sponsored programs to support domestic ICT entrepreneurs
n = 49

No	87%
Yes	13%

Domestic firm receptiveness to potential increased government startup financial support (e.g. loan or grant) options

No, I do not need these resources because I already have alternative finances available — **16%**

I believe this is a good idea and the government should offer more similar opportunities — **63%**

No, I do not believe these resources could be effectively implemented — **26%**

3%

Level of Vietnamese ICT firm satisfaction with current Internet content management regulations

Very satisfied	0%
Satisfied	0%
Somewhat satisfied	5%
Neutral	24%
Somewhat dissatisfied	45%
Dissatisfied	18%
Very dissatisfied	8%

71% dissatisfaction

Level of Vietnamese ICT firm satisfaction with current government policy to support ICT startups

Very satisfied	0%
Satisfied	0%
Somewhat satisfied	3%
Neutral	19%
Somewhat dissatisfied	24%
Dissatisfied	35%
Very dissatisfied	19%

78% dissatisfaction

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