A SYSTEMATIC REVIEW OF SCHOLARLY LITERATURE ON MEDIA GOVERNANCE AND DIGITAL PLATFORM REGULATION

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Abstract

ISSN: 1985-5826

This study employs a systematic literature review (SLR) to critically examine governance frameworks for Videoon-Demand (VoD) platforms against the evolving digital platform regulation across regional and global contexts. The study aims to synthesize extant scholarship to elucidate prevailing trends within the digital and regulatory landscape and to identify critical gaps, thereby generating evidence-based recommendations to guide future research and policy development. Through a systematic analysis of 49 studies, the research identifies two overarching themes of media governance: as a regulatory framework and as a social process. The former encompasses legal and institutional modalities for content regulation, audience protection, platform competition, and content discoverability, discussing how nation-states strategically adapt legacy media laws to transnational VOD platforms. The latter foregrounds the participatory dynamics among content producers, consumers, and regulatory bodies in shaping digital content curation, self-regulatory practices, and misinformation management. Moreover, some studies reveal inherent tensions between domestic cultural policies and the hegemony of global platforms such as Netflix, highlighting the challenges faced by nation-states in regulating content in a globalized media ecosystem. The findings suggest several important directions for future research, including understanding the rationales behind different media governance strategies, exploring how the media industry and its regulation are perceived by various stakeholders and conducting more comparative studies, especially in the Asia region, with a focus on integrating sustainable development principles into media governance frameworks.

Keywords. digital media regulatory frameworks, platform disruption, systematic literature review (SLR), Video-on-Demand (VoD).

Abstrak

Kajian ini menggunakan tinjauan pustaka sistematis (SLR) untuk mengkaji tata kelola media, dengan fokus kepada pelantar Video-on-Demand (VoD) dalam konteks regulasi pelantar digital. Kajian ini bertujuan untuk mensintesis kajian sedia ada bagi menghuraikan tren semasa dalam landskap digital dan peraturan serta mengenal pasti jurang kritikal, seterusnya menghasilkan penilaian berasaskan bukti untuk membimbing penyelidikan dan pembangunan dasar pada masa hadapan. Dengan menganalisis 49 artikel, kajian ini mengenal pasti dua tema utama mengenai tata kelola media: sebagai kerangka regulasi dan sebagai proses sosial. Tema kerangka regulasi meneroka mekanisme perundangan dan institusi untuk regulasi kandungan, perlindungan audiens, persaingan pelantar, dan penemuan kandungan, serta menekankan cara kerajaan mengadaptasi regulasi media tradisional untuk pelantar global. Tema proses sosial pula menonjolkan dinamik penyertaan antara pengeluar kandungan, pengguna dan badan pengawalselia dalam membentuk kurasi kandungan digital, amalan pengawalseliaan kendiri dan pengurusan maklumat palsu. Kajian ini juga mendedahkan ketegangan antara dasar budaya tempatan dan dominasi pelantar global seperti Netflix, yang menggambarkan cabaran yang dihadapi oleh negara-bangsa dalam mengatur kandungan dalam ekosistem media global. Penemuan ini mencadangkan beberapa arah penting untuk penyelidikan masa depan, termasuk memahami rasional di sebalik pelbagai strategi tata kelola media, meneroka cara industri media dan regulasinya diwacanakan oleh pemegang taruh utama dan menjalankan lebih banyak kajian perbandingan, khususnya di rantau Asia, dengan memberi tumpuan kepada pengintegrasian prinsip-prinsip pembangunan mampan ke dalam kerangka tata kelola media.

Kata kunci: disrupsi pelantar, kerangka regulasi media digital, tata kelola media, tinjauan pustaka sistematis (SLR), Video-on-Demand (VoD).

1.0 INTRODUCTION

ISSN: 1985-5826

Technological development frequently intersects with social, ethical, and political issues, as noted in historical studies (Mitcham, 2022; Suksawaeng, 2024). These studies highlight the recurring tension between optimistic views of promoting technological advancements and the need to address their societal impacts. Promotional and regulatory efforts often operate separately, which impedes the integration of social considerations into technological research and development (Ozcan & Hannah, 2020; Quach et al., 2022). In order to effectively capitalize on opportunities and surmount obstacles, it is crucial to understand the dynamics and trends in digital communication (Andzani & Irwansyah, 2023). Grasping these trends helps identify potential challenges and capitalize on opportunities within the digital landscape, including advancements in audio-visual media technology like Video-on-Demand (VoD).

The evolution of audio-visual media through the VoD platform represents a convergence of television, film, and the Internet (Jensen, 2022). The advent of VoD has significantly transformed audience viewing habits. This platform allows users to access audio-visual content anytime and anywhere, breaking the previous constraints of adhering to television schedules or movie theater showtimes. The number of households that subscribed to a VoD service rose almost 350% between 2014 and 2020. In 2021, over 75% of UK households say they have used at least one subscription VoD service (Department for Digital, Culture, Media & Sport, 2022).

As VoD expands internationally, it becomes subject to national laws and regulations (Scarlata & Lobato, 2023). Several types of rules are implemented and obeyed by a group of countries. VoD censorship, content classification, operational permits, taxation, local content quotas, production obligations, and contributions to national production budgets have

recently been imposed by governments of various political stripes (Budzinski & Stöhr, 2019; García Leiva & Albornoz, 2021). Each country has its own set of rules, especially when it comes to content regulations. Because content structuring is dominated by local values and traditions, this becomes a domain of national policy. This is motivated by a variety of priorities, including cultural diversity and anti-hegemony, censorship of 'Western' services for cultural and religious reasons, and local protectionism.

In the European Union, the revised Audiovisual Media Services Directive exemplifies how legislative frameworks can harmonize content regulation, aiming to protect viewers and preserve cultural integrity. This revision mandates a 30% European content quota for VoD services and allows member states to impose additional investment obligations and promotional requirements (García Leiva & Albornoz, 2021). Other regions have different focuses: Brazil emphasizes national production duties, while countries like Indonesia, Turkey, China, India, and Russia prioritize content censorship (Bizberge, Mastrini & Gómez, 2023; Scarlata & Lobato, 2023). Additionally, recent trends in Thailand, Pakistan, Burma, and Vietnam indicate increased censorship or monitoring of anti-government, racist, or extremist content (Buehler et al., 2021; George & Venkiteswaran, 2019). These varying approaches reflect differences in values and societal progress.

A critical discourse emerges around the efficacy and ethical implications of stricter regulatory control by local authorities versus fostering a culture of self-regulation among users. There are demands for a more sophisticated regulatory discourse that goes beyond individual responsibility to consider the structural inequalities and power imbalances inherent in the digital ecosystem. The media governance term was then born and represents a progressive framework for understanding and managing the media sector,

integrating rules and regulations through diverse theoretical lenses (Ansell & Torfing, 2022). At its core, media governance embodies shared responsibility among various stakeholders, acknowledging the impact of globalization and technological advancements on media regulation. This approach challenges traditional state-centric models of media oversight by emphasizing the interplay between multiple actors and institutions.

ISSN: 1985-5826

Central to media governance is its adaptability and capacity to connect with new sociological constitutionalism, which offers insights into the evolving nature of media regulation in contemporary societies (Chapdelaine & McLeod Rogers, 2021). This framework moves beyond traditional classifications of media systems by incorporating various dimensions, by doing so, it provides a more comprehensive understanding of media's role in society and its implications for democracy (Ala-Fossi et al., 2022; Danescu, 2021). The concept of media governance becomes particularly relevant when examining postregime-change media systems. Governance, like regulation theory, is not an invention of communication science. The origins of governance can be traced to different disciplines. Media governance theory is an interdisciplinary topic that studies the connections between media, governance and society (Humphreys & Simpson, 2018). Media governance involves several facets, such as the functions of government, media, and civil society in influencing media policies and practices. Media governance has become a catch-all word in the communication literature to describe new politics, politics, and policies in the media sector (Puppis & Van den Bulck, 2024). Some scholars have explored governance in depth as a concept of social control, offering a valuable theoretical framework for mapping communication systems (Puppis & Van den Bulck, 2024).

Thus, this paper aims to conduct a systematic literature review (SLR), investigating how the current

literature has shaped two fundamental questions in developing research ideas regarding the topic of media governance practices as an alternative method of describing and analyzing communication and media systems. By conducting an SLR, this paper can provide insights into different governments' strategies, and the challenges they faced when turning strategies into action. This is vital for advancing and refining theories related to media regulation, governance, and policy.

The following questions are defined to achieve certain analytical results through the SLR procedure.

- (i). What is currently being investigated in the field of media governance for VoD platforms?
- (ii). What are the recommendations that can be raised in future studies of media governance?

2.0 MATERIALS AND METHODS

A systematic literature review (SLR) study was selected as the primary method in this paper to further investigate and delve into the concept of media governance. A systematic literature review is a structured and methodical method of evaluating and integrating the most recent research on a specific topic. This approach is frequently implemented to investigate or establish connections with previous research. The objective of an SLR is to provide a comprehensive and unbiased assessment of the current body of knowledge, pinpoint any deficiencies, and suggest potential areas for future research (Oliver et al., 2018).

The systematic literature review (SLR) technique enables us to engage in a thorough analysis, comprehension, and assessment of the current body of literature. This process helps us to identify areas of uncertainty and identify gaps that require further investigation in future research. Therefore, in this research, we followed the guidelines which consist of three stages (Petticrew & Roberts, 2008):

(1) Planning the review – determining the objective of the review and formulating a review protocol (i.e., research questions).

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- (2) Conducting the review establishing search strategies (keywords, search terms, search string, inclusion criteria) and conducting the data extraction process and research synthesis with an interpretive approach and thematic analysis. The review process is illustrated using the PRISMA flow diagram, Figure 1. The PRISMA Flow Diagram initially lists the number of articles found and then explains the selection process by detailing decisions taken at various stages of the systematic review. It shows records identified, included, and excluded, along with their rationales. The inclusion and exclusion criteria
- were determined by factors like publication date, research design, population, and relevance (Azarian et al., 2023; Mohamed Shaffril, Samsuddin & Abu Samah, 2021; Pati & Lorusso, 2018).
- when performing a systematic literature review (SLR), researchers utilize an analytical framework to determine what aspects to examine, how to observe them, and how to interpret the data to answer the research questions (Krippendorff, 2018). The analysis of the selected papers was conducted using an analytical framework that was built upon previous systematic literature review (SLR) studies (lacuzzi, 2021; Yarnold et al., 2023).

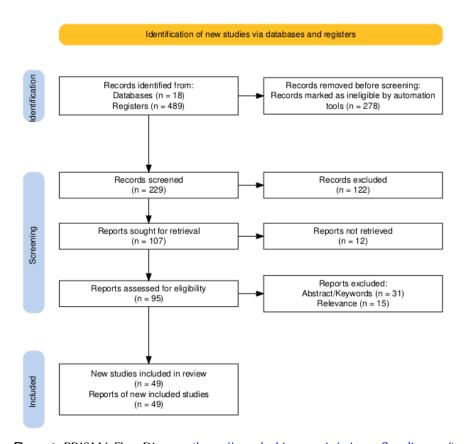


Figure 1: PRISMA Flow Diagram (https://estech.shinyapps.io/prisma_flowdiagram/)

3.0 RESULTS AND DISCUSSION

Table 1: Number and distribution of publications on media governance and VoD platforms by year and publication type

Received: 13 June 2025, Accepted: 30 June 2025, Published: 15 December 2025

https://doi.org/10.17576/ajtlhe.1701.2025.10

Overview	Source	Quantity
Year	2024	3
	2023	<i>15</i>
	2022	8
	2021	16
	2020	7
Publication	Journal	29
	Book Chapter	9
	Report	4
	Thesis	3
	Proceeding	1
	Book	3

ISSN: 1985-5826

As clearly demonstrated in Table 1, the volume of research rose sharply in 2021 (16 articles; Cole, 2021; Farchy, Bideau & Tallec, 2021) and 2023 (15 articles; Vlassis, 2023). Publications appear predominantly in peer-reviewed journals (n = 29), followed by book chapters (n = 9), reports (n = 4), books (n = 3), PhD theses (n = 3), and conference proceedings (n = 1).

The Current Findings on Media Governance for VoD **Platforms**

Research context and jurisdiction levels (i).

In response to the first request concerning the present situation of media governance for VoD platforms, a thematic analysis was carried out with the assistance of a VOSviewer. VOSviewer is a data visualization software that has been specifically designed for the analysis of links and clusters in scientific publications. VOSviewer enables researchers to visualize and analyze the relationships between authors, topics, or keywords in their scientific publication datasets. One of the primary capabilities of the VOSviewer is its capacity to generate network diagrams that illustrate the connections between entities in the dataset, including keywords or topics. This enables researchers to effortlessly recognize patterns, trends. concentrations that are present in the scientific literature regarding a specific subject.

The entire data set comprises 448 links and 106 clusters. The relationship between the linkages and the clusters is visually represented in this graphic, Figure 2.

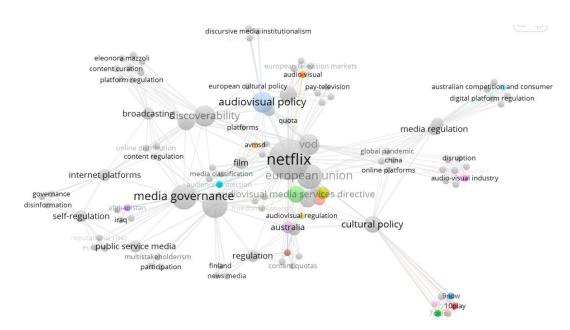


Figure 2: Thematic Analysis and Conceptual Linkage

When the clusters and connections are developed to provide answers to the research questions, more information is gathered in tabular form to facilitate the process of grouping, Table 2.

Table 2: Research settings of the reviewed literature,

Received: 13 June 2025, Accepted: 30 June 2025, Published: 15 December 2025 https://doi.org/10.17576/ajtlhe.1701.2025.10

detailing the countries studied

ISSN: 1985-5826

Research Setting		
Country	EU, French, Italy, Spain, Netherlands, Hungary, Poland, Sweden, Germany, UK, Korea, Vietnam, Singapore, India, China, Nigeria, Australia, Canada, Mexico, US	
Platform	Netflix, GloboPlay (Brasil), US-Based SVoD Platforms (Amazon Prime Video, HBO Max, Hulu, Disney Plus, and Apple TV Plus), AVoD, TVoD, Regional VoD Platforms (Salto (launched by French broadcasters) and BritBox (UK-based)), Chinese VoD Platforms (iQIYI, Youku, and Tencent Video), Ad-Supported VoD Platforms (Youtube), public service media (PSM)	
Focus	media governance, media policy, audiovisual regulation, audiovisual policy, content quotas, self-regulation, multistakeholderism, participation, discursive media institutionalism, audience protection, freedom of speech	

Most articles, approximately 49%, concentrated on the examination of media governance in Europe (24 articles). This is a result of the widespread reference to the Audiovisual Media Services Directive (AVMSD) and the European Media Freedom Act (EMFA) regulations by other countries worldwide. Numerous studies from diverse nations analyze and contrast major American platforms (e.g. Bouquillion, Ithurbide & Tristan, 2024; Fernandes & Albornoz, 2023) with local platforms or material (Haenig & Ji, 2024; Mazzoli, 2021), or evaluate regulatory studies pertinent to the European Union region (García Leiva, 2020; Vlassis, 2021b). Data reveals the presence of countries outside Europe and America, including Australia (8 articles), Canada (7 articles), Mexico (6 articles), China (4 articles), South Africa (4 articles), India (2 articles), South Korea (2 articles), Indo-Pacific (1 article), Nigeria (1 article), as well as Vietnam and Singapore (1 article).

The majority of these articles (55%) emphasized platforms and industries, their relationship to finance, tax regulation (Buriak & Weber, 2023; Kostovska, Raats & Donders, 2020), and governance from a business and economic perspective (Vlassis, 2022a). More studies (47%) presented and discussed audiovisual regulation followed by discursive media institutionalism (Fernandes, 2022). The topic of regulatory institutions is frequently addressed in the context of governance, particularly when analyzing cross-country comparative studies. 20 investigated the relationship between jurisdictions and countries, while seven papers addressed the local VoD context. Another aspect that is also prevalent in the discourse on regulation is the relationship between governance and a variety of actors and stakeholders (10 articles) (Cole & Etteldorf, 2023; Fernandes & Albornoz, 2023), which includes discussions on selfregulation and co-regulation (Mutu, 2024). Multi stakeholder practices in media policy making are considered important in many sources. This indicates an interesting direction: how various forms of media governance result in varying levels of efficacy, including the roles of government, media, and civil society in shaping media policies and practices.

(ii). Research methodology, techniques, and theoretical frameworks

The existing literature is composed of a variety of theories, such as governance theory (16 articles), media economics theory (13 articles), media pluralism theory (9 articles), freedom of speech theory (4 articles), and public engagement theory (9 articles). Additionally, there are numerous frameworks and concepts, including regulatory systems (12 articles), legal and policy frameworks (8 articles), constructivism (1 article), multistakeholderism (2 articles), and cultural policy (8 articles). These theories establish a framework for comprehending the intricacy of media regulation and its

influence on social dynamics and freedom of information in the new digital era, Table 3.

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Table 3: Framework and Methodology

Theoretical	governance theory, media
Framework	economics theory, media
	pluralism theory, freedom of
	speech theory, and public
	engagement theory, regulatory
	systems, legal and policy
	frameworks, constructivism,
	multistakeholderism, and cultural
	policy.
Methodology	Case study, interview, document/
	literature analysis, comparative,
	policy analysis, impact
	assessment, market research and
	audience analysis, qualitative,
	quantitative

The methodological approaches of the articles were categorized according to the way the authors presented their discussion and analysis, despite the fact that some articles did not explicitly state their methodological perspectives. The methodology of the majority of the studies (65%) was qualitative (Csordás & Gálik, 2024; Parthasarathi, 2023). Quantitative methods. including audience analysis, impact assessments, and public value surveys, were employed in only 14% (7 articles) (Kumar & Kamau, 2023).

Every item in this review was categorized as an empirical study, highlighting a deficiency in the conceptual framework of the existing knowledge on this subject. It is possible that researchers require a more comprehensive comprehension of the swiftly changing situation because the norms of media regulation and governance have indeed continued to shift and change in the years following COVID-19. It is imperative to investigate alternative research methodologies to conduct a more comprehensive examination of the phenomenon, as documentary content analysis and literature reviews are employed in the majority of studies on media governance and regulation on VoD platforms (51%).

(iii). Research contributions and implications

Two aspects of the contribution and implications of media governance studies were emphasized, as shown in Table 4.

Table 4: Literature Implications

Contribution/Implication		
Practical	Enhanced regulatory mechanisms, stakeholder engagement, encouragement of best practices, insights into audience measurement	
Academic	Framework development, mapping accountability networks, highlighting the role of technology, future research directions	

In practice, media governance studies have facilitated the enhancement of regulatory mechanisms, stakeholder engagement (Flew et al., 2021), audience measurement insights, and the promotion of best practices (Farchy, Bideau & Tallec, 2021). The countries in this literature review have implemented each of these contributions in a variety of methods. Academically, the data discovered indicates that governance studies have facilitated the development of frameworks, the mapping of accountability networks, the identification of the role of technology, and the direction of future research. Likewise, this article will present the conceptual framework that has been developed from the literature review, as well as the research directions for future research and in the discussion section.

3.2 Discussion

(i). Media governance as a regulatory system

In the context of media governance, a regulatory system is a set of structures and mechanisms that are intended to supervise and regulate media operations. The word

media governance is frequently employed in many manners within media literature: typically, as synonymous with media policy and/or regulation (Ashwini, 2021) and occasionally as a general alternative for media control systems (Freedman, 2008; Tambini, 2021). Media governance has emerged as a comprehensive term in communication literature to denote the evolving politics and policies within the media sector. Some scholars have explored governance in depth as a concept of social control, a useful theoretical path for mapping communication systems (Puppis & Van den Bulck, 2024). In other publications in the field of communication, the term is associated with discussions of media and globalization or the relationship between media and markets (Jansson & Belle, 2024; Moore & Tambini, 2022), media and society (Ala-Fossi et al., 2022; Salih, 2021), and media and pluralism (Fu, 2024; Humphreys & Simpson, 2018).

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Through an analysis of academic literature on media governance development, a comprehensive conceptual framework has been developed, forming the foundational basis for this project. The framework provides a systematic and thorough examination of the critical components central to the study, mapping out their interconnections and exploring the dynamic interplay among them. It aims to articulate a governance model that balances safeguarding the public interest and protecting individual liberties, fostering a media environment characterized by responsibility, and accountability. This framework is grounded in a meticulous review of existing scholarly works, enabling researchers to contextualize their findings within the broader field of knowledge. Drawing upon Kivunja's (2018) insights into conceptual framework construction, the development process integrates identified study components into a unified regulatory system framework, Table 5. This iterative process not only synthesizes the research findings but also incorporates theoretical insights and empirical evidence, offering a structured yet adaptable tool for evaluating and shaping media governance systems.

Table 5: Component of Media Governance as Regulatory System Framework

No	Component	Breakdown
1.	1. Modes	Self-Regulation
		Co-Regulation
		State Regulation
2	2. Institutions	Formal Institutions
2.		Informal Institutions
3. Leve		National
	Levels	Supranational
		Global
4. 5	Stakeholders	Government Regulators
		Citizen Groups
		Industry Bodies
5.	Mechanisms	Policies and Regulations
		Algorithms
		Participative Frameworks
6.	Products	Media Content
		Public Trust
		Regulatory Compliance

The framework, outlined in Table incorporates six core components and exceeds conventional media system classifications by integrating a variety of dimensions, including modes (Mazzoli, 2021; Wayne & Castro, 2020), institutions (Csordás & Gálik, 2024; Danescu, 2021), levels (Saurwein & Spencer-Smith, 2020), stakeholders (Flew et al., 2021; Vlassis, 2022), mechanisms (Buriak & Weber, 2023) and products (Labafi, Darvishi & Moghadamzadeh, 2022). Each component is further broken down into specific subcategories to capture the multifaceted nature of media governance. The integration of scholarly insights and practical components positions this framework as a valuable tool for both academic inquiry and policy development, ensuring that media governance continues to evolve in response to societal

needs and its implications for democracy.

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(ii). Media governance as a social process

Media governance as a social process is deeply intertwined with the complexities of decision-making among multiple actors, each of whom brings distinct values, knowledge, and perspectives to the table. Unlike studies that focus directly on specific problem areas, media governance research emphasizes navigating these decisions within a multi-actor landscape, where competing interests and values must be reconciled. The attitudes of various actors toward a decision often stem from differing value systems, knowledge bases, and contextual references, ultimately influencing the outcomes of governance processes (Rodríguez-Castro & Campos-Freire, 2023). Media governance, therefore, is not just about setting policies but about effectively steering these decisions in ways that reflect the values of the actors involved and ensuring that the enforcement of these values is sustained through actual activities and outcomes. Crucially, the capacity for media governance is determined by two main factors: (i) the values that guide the decision process, and (ii) the capacity to apply these values both in the process itself and in its outcomes (Peters, 2019). Every governance decision is inherently value-laden, and whether an actor approves or rejects a decision is directly tied to the perceived desirability of the results it will produce. This highlights the fundamental role of values and ethics in shaping media governance decisions, particularly regarding the quality of social life and the social order that emerges from these decisions.

Furthermore, media governance extends beyond regulatory frameworks to encompass the broader social implications of technological choices, especially in relation to cultural policy and nation-building (Buriak & Weber, 2023; Jo & Jin, 2022). In this way, it aligns with the idea that governance involves more than mere policy enforcement. In fact, it also

includes managing the decision process so that the outcomes align with the ethical and social values of the actors involved. This process of managing decision-making within governance frameworks is critical to improving the quality of social life, fostering social change, and reinforcing democratic decision-making processes. This also means that media governance deals with action, social interaction, social values, and social change.

From an institutional perspective, media governance is ostensibly about the structures, rules, and stakeholders that shape public policies and media regulations. However, this seemingly neutral framing masks the critical issue of media ownership and its profound influence on governance dynamics. While it is often suggested that state, public, and private actors function as equal partners in balancing regulatory power, the reality is far more skewed. The disproportionate influence of private ownership, particularly in the context of conglomerates and monopolistic practices, raises significant concerns about the democratic legitimacy and equity of media governance frameworks.

Effective media governance, in theory, necessitates robust interaction among the three modes of regulation: self-regulation, co-regulation, and state regulation. Yet, this balance is often undermined by the vested interests of powerful media owners who dominate policy making spaces, marginalize public interest groups, and dilute the accountability of state regulators. Media ownership structures are not merely economic arrangements but also political mechanisms that shape the allocation of resources, the framing of public discourse, and ultimately, the boundaries of what is regulated and how.

Media governance, as a social process, requires more than an understanding of formal regulations; it demands a critical examination of the underlying power

imbalance and the socio-economic dynamics that influence decision-making and implementation. Without addressing the issue of private ownership, discussions of media governance risk perpetuating a façade of inclusivity and balance while ignoring the structural inequalities that define the media landscape. Thus, the challenge lies not only in achieving formal regulatory outcomes but also in creating governance systems that actively dismantle these inequities to enable more democratic and transparent decision-making processes.

3.3 Directions for Future Research

ISSN: 1985-5826

The media and telecommunications sector has experienced a paradigmatic statehood transformation in recent decades. This transformation can be observed in trends such as the transition from protectionism to competition promotion, delegating political and operational functions to cross-sectoral (horizontal) frameworks, scaling regulation form the national to the supra- and international levels, and transitioning from state-centric to hybrid self- and co-regulatory models. However, these normative shifts rest on untested assumptions and conceal deep tensions that warrant critical scholarly interrogation.

As the literature reveals, several areas require further exploration. Current policy discourse valorizes competition and regulatory independence as panaceas for market failures, yet these reforms often outpace empirical validation. Future studies must unpack the political-economic logics that underpin divergent governance strategies by interrogating, for example, why some jurisdictions "privatize" oversight through co-regulation while others double down on statutory authority. Such research should critically assess how financial, structural, and consumer-related risks are framed and managed by regulators in contexts of rapid technological change. Empirical investigation is needed into whether hybrid regimes genuinely mitigate

uncertainty or merely diffuse accountability across stakeholders.

Secondly, although multi-stakeholder approach is heralded as a democratic corrective to state overreach, there is scant empirical work on how media actors, public officials, and citizens perceive and navigate these governance architectures. Future inquiries should adopt mixed method approaches to reveal how power imbalances, rooted in ownership concentration and political influence, shape stakeholder engagement. Critical discourse analysis can expose whether self-regulatory forums reproduce existing hierarchies under the guise of public participation, and ethnographic studies can trace how marginalized groups are included or excluded from policy deliberations.

Third, the existing literature remains heavily skewed toward Western contexts, leaving Asia understudied despite its market dynamism and diverse regulatory experiments. Comparative particularly focused on Indonesia and its ASEAN peers, should examine how sustainable development goals intersect with media governance. Case studies might explore, for instance, whether content-quota regimes bolster cultural diversity without yielding protectionist backsliding, or how supranational instruments (e.g., APT-FTAs) recalibrate domestic regulatory autonomy. Embedding sustainability metrics into governance assessments will illuminate pathways toward equitable, socially inclusive digital media ecosystems.

By interrogating the ideological premises of competition, scrutinizing the lived realities of stakeholder participation, and broadening the geographic and normative scope of inquiry, future research can move beyond techno-legal prescriptions and foster governance models that are both accountable and adaptive to the complexities of VoD platforms in a globalized media order.

4.0 CONCLUSION

ISSN: 1985-5826

Rooted in a systematic review of contemporary scholarship, this article advances a conceptual framework that captures the dual dimensions of media governance as both a regulatory system and a social process within VoD ecosystem. Far from a mere descriptive tool, this framework serves as a critical lens through which to interrogate the political-economic rationales that underpin hybrid governance regimes (state, co-, and self-regulation) and their attendant risk-mitigation logics in the face of rapid technological change.

Crucially, the framework foregrounds the need to unpack how power asymmetries shape stakeholder perceptions and participatory dynamics. By highlighting the gap between formal multistakeholder architectures and the lived experiences of industry actors, regulators, and audiences, it calls for mixed-method inquiries that combining critical discourse analysis and ethnography to reveal how governance forums may reproduce entrenched hierarchies under the guise of inclusion.

Finally, this study exposes a marked scarcity of comparative research in Asian contexts where jurisdictional experiments intersect with sustainable development imperatives. It thus urges scholars to conduct cross-national and longitudinal analyses that embed sustainability metrics into governance assessments by examining, for example, how contentquota regimes or supra-regional trade agreements recalibrate domestic regulatory autonomy. By weaving together these critical strands of deconstructing governance rationales, scrutinizing participatory power, and broadening the geographic and normative scope, this approach not only charts a path for rigorous future research but also provides ASEAN policymakers and global industry stakeholders with an adaptive, evidencebased blueprint for cooperative governance frameworks

that cultivate a more accountable, inclusive, and resilient media ecosystem.

5.0 ACKNOWLEDGEMENTS

We are grateful to the School of Communication at Universiti Sains Malaysia for providing academic support for our research, as well as to the Indonesia Endowment Fund for Education for providing financial support for the project.

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