

## Consultation, Participation, and the Institutionalization of Governance Reform in China

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### ABSTRACT

Although the Chinese government has implemented governance reforms that increase transparency and public involvement in the policymaking process, it is uncertain the extent to which these reforms have institutionalized. This article examines the institutionalization—persistence, substantive development, and standardization of best procedures—of online consultation, a prominent instrument of governance reform in which government officials provide interested parties with opportunities to comment on draft laws and regulations over the Internet. The article specifically entails the coding and analysis of hundreds of policy proposals and

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<sup>1</sup> This working paper reflects the views of the author, and does not represent an official position of the GW Regulatory Studies Center or the George Washington University. The Center's policy on research integrity is available at <http://regulatorystudies.columbian.gwu.edu/policy-research-integrity>.

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thousands of public comments in the context of the Ministry of Commerce and Guangzhou Municipal Government, two organizations at the forefront of the implementation of online consultation. The analysis demonstrates that the consultation practices of the Ministry of Commerce and Guangzhou Municipal Government have institutionalized to a greater degree than the citizen feedback that occurs in response to draft laws and regulations. These results point to the conclusion that online consultation is a governance reform that has advanced transparency and (to a lesser degree) public participation, but has not eroded the Chinese Communist Party's dominance over policymaking.

## Consultation, Participation, and the Institutionalization of Governance Reform in China

Authoritarian regimes throughout the world have implemented governance reforms that increase transparency and public involvement in the policymaking process (Huntington 1991, Levitsky and Way 2002, Magaloni 2006). The Chinese Communist Party (CCP), for example, has experimented with participatory budgeting (Fishkin, et al. 2000) and mandated the periodic contesting of village elections (O'Brien and Han 2009). Such reforms intendedly serve purposes such as enriching the information environment of government decision makers, bolstering social stability, and enhancing the legitimacy of the regime's procedures and policies (Kornreich, Vertinsky, and Potter 2012; Manion 2014; Meng, Pan, and Yang 2014).

Although explicitly not oriented toward facilitating Western-style democracy (Xinhua 2014a), governance reforms have the potential to fundamentally reconstitute the consultative and participatory environment of the Chinese political system (He and Thogersen 2010, Truex 2017). One prerequisite for the realization of such developments is the institutionalization of governance reforms (Berman 2001). To institutionalize, governance reforms must persist beyond their initial applications. Novel experiments with alternative approaches to governance, regardless of their transformational possibilities, do not necessarily become ongoing means of making public decisions (Fewsmith 2013).

Institutionalized governance reforms are characterized not only by persistence, but also by procedural and substantive development. The standardization of best procedures, for example, is a hallmark of institutionalization (He 2014). In addition, the substantive character (e.g., breadth and depth) of government and public behavior affects the degree and nature of the institutionalization of governance reforms (Ergenc 2014, Tan 2010).

Research is mixed regarding the extent to which governance reforms in China have institutionalized. Some research highlights improvements in transparency and public participation (He 2014, Lu 2012), while other research points out limitations in persistence, substantive development, and standardization of best procedures (Fewsmith 2013; Li, Liu, and O'Brien 2012).

Together such results suggest that institutionalization varies across instruments of governance reform, as well as across the organizational contexts within which reforms are implemented.

Given the need for context-specific analysis, this article examines the institutionalization of online consultation, a prominent instrument of governance reform (Horsley 2009). Under online consultation, government officials provide interested parties with opportunities to comment on proposed public policies over the Internet. The Chinese government has stated that it will “make use of the Internet as a standard method of inviting public opinion on draft laws and regulations” (Xinhua 2008a).

Despite this aspiration, it remains uncertain the extent to which online consultation has in fact institutionalized. Research demonstrates that the legal environment within which online consultation operates has become increasingly permissive (Horsley 2018, Kui 2018), thereby opening the possibility of persistence, substantive development, and standardization of best procedures. The achievement of these possibilities in practice, however, has not yet been adequately established. Researchers have examined a number of particularly noteworthy instances of government consultation and public participation (Balla 2012, 2014; Balla and Liao 2013; Ford 2012). Case studies of high-profile policymaking processes, however, are of limited utility in evaluating the institutionalization of online consultation as a governance reform.

To address these uncertainties, the article investigates the practices of two Chinese government organizations—the Ministry of Commerce and Guangzhou Municipal Government—that have been in the vanguard of the implementation of online consultation and, therefore, present plausible contexts for institutionalization. The investigation specifically entails the coding and analysis of hundreds of consultations conducted by these organizations, as well as thousands of public comments submitted during these consultations. The article utilizes this extensive collection of information as a means of assessing the institutionalization—defined and measured as persistence, substantive development, and standardization of best procedures—of both government and public behavior in online consultation.

Through this analysis, the article makes a number of contributions to knowledge regarding consultation, participation, and the institutionalization of governance reform in China. The Ministry of Commerce and (in particular) Guangzhou Municipal Government have utilized online consultation frequently over the years and across policy areas. These organizations disseminate detailed policy information and provide ample opportunities for public feedback. Despite such information and opportunities, the volume and professional expertise of public participation in online consultation is typically rather modest. Participants, however, do not hesitate to express political viewpoints, including opposition (sometimes strident) to draft laws and regulations. Collectively, these findings suggest that online consultation is an institutionalized governance reform that has incrementally advanced transparency and (to a lesser extent) public involvement, but has not eroded the CCP’s underlying control over policymaking.

## The Institutionalization of Governance Reform

Although fundamentally motivated by the preservation of authoritarian power (Dickson 2016), the implementation of governance reform is not necessarily problematic from the perspective of the public (Lorentzen, Landry, and Yasuda 2014). The extent to which transparency and public involvement are ultimately advanced is dependent in no small part on the institutionalization of governance reform. In this regard, extant research has examined governance reform in a number of specific instrumental and organizational contexts.

### Village Elections

One of the most publicized governance reforms has been the contesting of village elections (Nathan 1986, O'Brien and Li 2000). Across a variety of dimensions, village elections have institutionalized over the past several decades. Village elections have persisted since their first occurrence early in the post-Mao period (O'Brien and Li 2000). Elections have spread geographically and are now mandated to occur periodically in hundreds of thousands of villages across the country (O'Brien and Han 2009). Through the passage and implementation of the Organic Law of Village Committees, the procedural conduct of elections has been standardized and improved in a number of, though certainly not all, respects (Lu 2012, O'Brien and Li 2000, O'Brien and Han 2012). Some, but not all, research suggests that citizen participants in elections are high in external efficacy and democratic orientation (Chen and Zhong 2002, Shi 1999, Zhong and Chen 2002), substantive characteristics historically associated with institutionalized elections throughout the world (Dalton 1988; Verba, Nie, and Kim 1978). In sum, elections have promoted change in village governance and citizen attitudes and behavior (Kennedy 2009; Manion 2006, 2009; O'Brien and Han 2009). Such changes, however, have occurred within the overarching context of continued CCP dominance over public input in village decision making (Alpermann 2009, Tan 2010).

### Deliberative Polling

Other prominent governance reforms have institutionalized to a more limited extent than village elections. Over the past decade, deliberative polling has been applied to public decision making in Wenling, a coastal city in Zhejiang Province (Fishkin, et al. 2010; He 2014; Leib and He 2010). In deliberative polling, probability sampling is used to construct bodies of citizens who participate in moderated discussions of particular issues in public affairs (Fishkin, et al. 2010).

By a number of measures, deliberative polling has become an institutionalized mode of decision making. Not only has deliberative polling persisted since its initial application, it has also experienced procedural development. With each subsequent deliberative poll, the selection of participants and interaction between government officials and the public has improved significantly (He and Thogersen 2010). Deliberative polling was originally utilized to prioritize government spending on infrastructure projects such as roads, bridges, schools, and parks (Fishkin,

et al. 2010). Over time, deliberative polling has expanded to encompass discussions of the city's budget in general (He and Warren 2011).

The limitations of the institutionalization of deliberative polling have been manifested in the substantive behavior of both citizens and government officials. It is not uncommon for participants in deliberative decision making to express concerns about stating opinions hostile to established courses of action (He 1997). Government officials have prohibited the application of deliberative polling to politically sensitive issues that potentially threaten the legitimacy of the CCP (He and Thogersen 2010). Most fundamentally, deliberative polling has not become a common feature of budgetary policymaking across the country (Fewsmith 2013).

## The Internet and Governance Reform

Government websites are platforms through which transparency and public involvement reforms are potentially implemented (Schlaeger and Jiang 2014). The efficacy of the Internet as an instrument of governance reform, however, has not yet been established. Government websites have historically been oriented toward conveying information, rather than providing the public with opportunities to express political sentiments (Guo 2006, Jiang and Xu 2009). Furthermore, citizens are for the most part uninformed about the prospects of e-government (Guo 2006).

Research on the content and participatory environment of government websites has primarily focused on the operation of specific types of portals at particular moments in time (Balla 2017; Jiang and Xu 2009; Zhou, Chan, and Peng 2008). As a result, not much is known about the persistence and procedural and substantive development of the Internet as an instrument of governance reform (Schlaeger and Stepan 2017). By analyzing the institutionalization of online consultation, the article generates context-specific information regarding the possibilities of the Internet in enhancing transparency and public involvement during the making of policy decisions.

## Online Consultation

Online consultation is a relatively recent manifestation of the use of government websites as instruments of governance reform. The underlying notion of the solicitation of public feedback on draft laws and regulations, however, dates back to the early years of the People's Republic of China (Horsley 2009). By the 1990s, organizations from across the Chinese government had experimented with providing the public with opportunities to comment on prospective courses of action (Horsley 2009).

In the 21st century, government notification and public feedback no longer occur primarily through traditional modes of communication, but rather over the Internet. Early applications of online consultation addressed such issues as marriage, property, and labor contract law (Horsley 2009).

Dozens of governments at the central, provincial, and local levels have experimented with online consultation (Balla 2017, Horsley 2009).

Due in part to the opacity of the Chinese policymaking process, little is known about the operational details of online consultation. Some extant research consists of case studies of particularly salient applications, such as health care reform and criminal procedure law (Balla 2012, 2014; Balla and Liao 2013; Ford 2012; Xinhua 2008b). Other research examines the utilization and character of online consultation across government organizations and policy areas (Balla 2017, Horsley 2009). Existing research, however, does not address the extent to which online consultation has persisted and developed procedurally and substantively in particular organizational and policymaking contexts.

The article draws on previous research (Balla 2017, Horsley 2009) to identify government organizations that have been in the vanguard in implementing online consultation. Two fundamental attributes differentiate government organizations from one another in the operation of online consultation. The first attribute is whether the full texts of draft laws and regulations are circulated during online consultations. Although many government organizations disclose the texts of policy proposals, some ministries and governments provide summaries instead (Balla 2017). The second attribute is whether feedback submitted by participants is made publicly available on online consultation websites. Few government organizations post the texts of public comments (Balla 2017).<sup>5</sup>

From the set of organizations that both disseminate the full texts of policy proposals and post public feedback to the Internet, the Ministry of Commerce and Guangzhou Municipal Government have been chosen as the focal points of the analysis.<sup>6</sup> The Ministry of Commerce is a cabinet-level department with jurisdiction over foreign trade and other economic concerns. The Guangzhou Municipal Government, by contrast, is a local authority with responsibility for making policy across a wide range of issue areas. Although distinct hierarchically and substantively, these organizations have both been in the forefront in the implementation of online consultation (Balla 2017, Horsley 2009). The article therefore searches—in a manner consistent with previous research on governance reform (Fewsmith 2013; Florini, Lai, and Tan 2012)—for evidence of institutionalization in the context of leading organizations.<sup>7</sup>

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<sup>5</sup> Given the dictates of censorship (MacKinnon 2012), it is not necessarily the case that such organizations post all comments submitted during all online consultations.

<sup>6</sup> These organizations have been chosen over other possibilities for a variety of reasons. For example, the Ningxia Provincial Government makes feedback publicly available, but public participation has been rather limited. The online consultation practices of the National Administration of Surveying, Mapping and Geoinformation (NASMG) are state of the art in a number of respects. The overall scale of the NASMG's operation, however, is rather small.

<sup>7</sup> In other words, if institutionalization has not occurred at the Ministry of Commerce and Guangzhou Municipal Government, it is unlikely to have taken place in other organizational contexts.

## Evidence of Institutionalization

The article’s approach of collecting and analyzing information about policy proposals and public comments builds upon existing knowledge of online consultation (Horsley 2018, Kui 2018). Over the past two decades, the legal framework within which online consultation operates has advanced significantly. In 2000, the Legislation Law established the broad principle that citizens have the right to participate in the policymaking process (Horsley 2018). Subsequent procedures and their amendments—such as a general expectation of 30-day comment periods on draft laws and regulations (Horsley 2018)—have specified the manner in which this principle is to be operationalized. Although such procedures are prerequisites of institutionalization, the permissibility of the legal environment itself does not constitute sufficient demonstration. As a next step toward making this determination, the article assesses the institutionalization of online consultation across three dimensions—persistence, substantive development, and standardization of best procedures. As Table 1 illustrates, these dimensions are evaluated in the context of both government consultation and public participation as they have occurred at the Ministry of Commerce and Guangzhou Municipal Government.<sup>8</sup>

Table 1: Indicators of Institutionalization

	Persistence	Substantive Development	Standardization of Best Procedures
<i>Government Consultation</i>	<ul style="list-style-type: none"> <li>• frequency of online consultation</li> <li>• diffusion of online consultation across offices and policy areas</li> </ul>	<ul style="list-style-type: none"> <li>• level of detail of policy proposals</li> </ul>	<ul style="list-style-type: none"> <li>• duration of comment periods</li> </ul>
<i>Public Participation</i>	<ul style="list-style-type: none"> <li>• volume of comments</li> </ul>	<ul style="list-style-type: none"> <li>• level of detail of comments</li> <li>• expertise of comments</li> <li>• sentiment of comments</li> </ul>	

*Note:* The standardization of best procedures is not examined in the context of public feedback, as procedures falls outside of the domain of participants in online consultation (i.e., procedures are designed by officials in the Ministry of Commerce and Guangzhou Municipal Government).

<sup>8</sup> One element not explored concerns the responsiveness of government officials to public comments. Due to the opacity of the Chinese policymaking process (e.g., government organizations by and large do not publicly respond to comments [Balla 2017]), it is not possible to systematically document outside influences on decision making (Kui 2018), particularly in the context of hundreds of consultations and thousands of comments. The possibilities of online consultation as an institutionalized forum for government responsiveness therefore remain uncertain.

## Assessing Government Consultation

The persistence of government consultation is assessed through a pair of indicators: (1) the frequency of online consultation, and (2) the diffusion of online consultation across offices and policy areas. In the analysis that follows, the institutionalization of online consultation is indicated by frequent utilization and diffusion across offices and policy areas under the jurisdiction of the Ministry of Commerce and Guangzhou Municipal Government.

The substantive development of government consultation (i.e., breadth and depth of content) is evaluated through the level of detail of policy proposals. The institutionalization of online consultation is indicated by the thoroughness of the information communicated in proposals circulated by the Ministry of Commerce and Guangzhou Municipal Government.<sup>9</sup>

The analysis gauges the standardization of best consultation procedures according to the duration of comment periods. The institutionalization of online consultation is demonstrated through the provision of feedback periods of ample duration (as specified in government recommendations) by the Ministry of Commerce and Guangzhou Municipal Government.

## Assessing Public Participation

The persistence of public participation is operationalized as the volume of comments. The institutionalization of online consultation is denoted by the submission of robust numbers of comments to the Ministry of Commerce and Guangzhou Municipal Government.

The substantive development of public participation is measured according to three elements: (1) the level of detail of comments, (2) the expertise of comments, and (3) the sentiment of comments. The institutionalization of online consultation is indicated by the submission of detailed comments, comments that draw upon the professional expertise of participants, and comments that express a variety of substantive viewpoints, including opinions critical of Ministry of Commerce and Guangzhou Municipal Government draft laws and regulations.

## Data Collection and Coding

Information about consultations conducted by the Ministry of Commerce and Guangzhou Municipal Government, as well as feedback submitted in response to policy proposals, was collected from the Internet. Both organizations, as is not uncommon for Chinese ministries and governments, have consultation and feedback sections on their websites (Balla 2017).<sup>10</sup> From these

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<sup>9</sup> The operationalization of indicators of institutionalization (e.g., thoroughness and other indicators discussed in subsequent paragraphs) is detailed in the following section.

<sup>10</sup> These sections are accessible at <http://www.mofcom.gov.cn/article/au/> (Ministry of Commerce) and <http://www.gzlo.gov.cn/gzsfzb/lfzqyj/lmtt.shtml> (Guangzhou Municipal Government).



websites, the full texts of consultations and public comments were assembled, from the time the organizations began utilizing online consultation through 2016.<sup>11</sup> Collectively, these documents constitute a historical record of consultations and comments posted by the Ministry of Commerce and Guangzhou Municipal Government.<sup>12</sup>

Altogether, information was extracted for 564 Ministry of Commerce consultations conducted between 2002 and 2016, as well as 2,820 public comments submitted in response to these consultations. The Guangzhou Municipal Government began utilizing online consultation in 2010, and by 2016 had posted 137 policy proposals and 9,098 comments.<sup>13</sup> These sets of consultations and comments form the basis of the article's analysis of the institutionalization of online consultation.

The consultations and public comments were evaluated according to a process of consensus coding. Two trained coders examined each document separately, coming up with preliminary assessments. These judgments were then compared and the coders came to agreement on final determinations. Any remaining uncertainties or discrepancies were resolved by coding supervisors.

The consultations and public comments were coded along a number of dimensions, as a means of assessing the institutionalization of online consultation. The persistence of online consultation is documented by tracking the frequency of consultations, diffusion of consultations across offices and policy areas, and volume of comments submitted in response to consultations. The substantive development of online consultation is evaluated through the level of detail of consultations (number of characters in draft laws and regulations), as well as the level of detail of comments (number of characters), expertise of comments (referencing of professional experience), and sentiment of comments (positive, neutral, or negative). The standardization of best procedures is operationalized as the duration of comments periods (number of days).

## Analysis of Consultation and Participation

The analysis of consultations and public comments proceeds in two stages. The consultation practices of the Ministry of Commerce and Guangzhou Municipal Government are first examined. The analysis then turns to an evaluation of the feedback generated by the draft laws and regulations

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<sup>11</sup> Information was extracted from the websites in the spring of 2016.

<sup>12</sup> Proposals and comments not posted by the organizations (e.g., censored public feedback) fall outside the scope of the analysis.

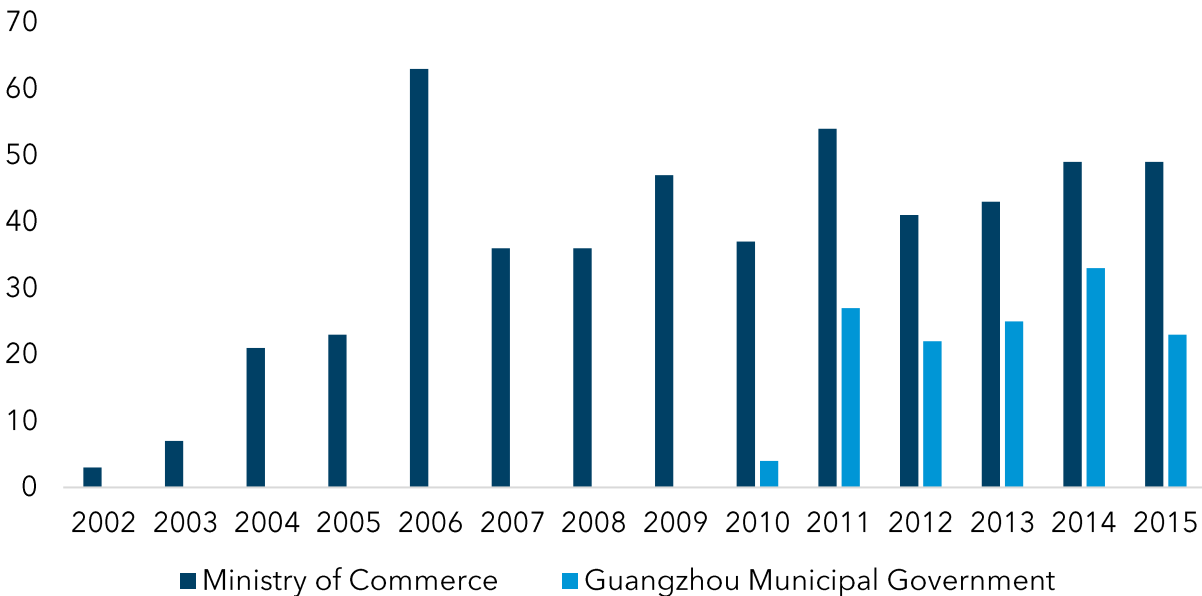
<sup>13</sup> Information about more than 11,000 comments was originally extracted from the website of the Guangzhou Municipal Government. Not all of these comments, however, contain substantive content (e.g., some comments consist completely of symbols such as “1” and “/”). Such meaningless comments were excluded from the analysis.

of both organizations. The institutionalization of government consultation and public participation is assessed through measures of persistence, substantive development, and standardization of best procedures.

### Government Consultation: Persistence

The fact that the Ministry of Commerce and Guangzhou Municipal Government have conducted hundreds of consultations serves, in and of itself, as an indicator of institutionalization. As Figure 1 illustrates, the utilization of online consultation rapidly increased in frequency after its initial application in both organizations. The Ministry of Commerce commenced with three consultations in 2002, expanded to a peak of 63 consultations in 2006, and maintained an annual level of roughly 40 consultations in subsequent years. The Guangzhou Municipal Government initiated its first four consultations in 2010, and conducted approximately 25 consultations per year during the 2011-2015 period. Overall, both organizations have employed online consultation on a regular, sustained basis.

Figure 1: Number of Consultations, By Year



*Note:* The y-axis represents the number of consultations conducted in a particular year. Since the Ministry of Commerce and Guangzhou Municipal Government websites were scraped in the spring of 2016, the consultation counts for this partial year were excluded from the figure. The information in this figure, and all figures presented in the article, was collected and coded by the authors.

The Guangzhou Municipal Government has jurisdiction over a broad array of policy areas, from commerce and transportation to health, safety, and the environment. The vast majority of the organization’s consultations address policies and services encountered by residents in their everyday lives. These issues include parks, road tolls, health insurance, and education programs.

Only a handful of consultations tackle concerns, such as religious activity and birth limitations, that might be considered politically sensitive by government officials and the public.

In 2010, the Guangzhou Municipal Government initially conducted consultations in three areas of jurisdiction—housing, the environment, and government operations.<sup>14</sup> In 2011, consultations occurred for the first time in an additional seven areas, including infrastructure, science and technology, and the arts, culture, and education. By 2014, the Guangzhou Municipal Government had requested public feedback on draft laws and regulations in 13 distinct areas of policy. In most of these areas, online consultation has occurred on a regular basis, thereby demonstrating the persistence of this governance reform across jurisdictions of the Guangzhou Municipal Government.

At first glance, similar jurisdictional development has occurred at the Ministry of Commerce, with 22 separate departments having conducted consultations during the period under analysis. The vast majority of these consultations, however, were initiated by four departments—European Affairs, Treaty and Law, Asian Affairs, and American and Oceanian Affairs. Most of the remaining departments have utilized online consultation on no more than a handful of occasions.

Furthermore, only 189 of the Ministry of Commerce’s 564 consultations consisted of the solicitation of comments on policy proposals. The majority of consultations were announcements of intergovernmental meetings related to trade or intellectual property. On June 13, 2013, for example, the Department of European Affairs announced that the 27<sup>th</sup> China-European Union Economic and Trade Joint Committee was to be held in Beijing. The announcement solicited comments from departments, local governments, and enterprises regarding issues they encounter and suggestions for enhancing economic and trade relations between China and the European Union. Although such meetings entail interaction with interested parties from outside of the Ministry of Commerce, the announcements do not consist of online consultation as considered in this article—draft laws and regulations that government officials solicit feedback on prior to finalization. This limitation, together with the fact that most departments do not conduct such consultations on a regular basis, tempers the conclusion that online consultation has become a common instrument of policymaking across organizational units of the Ministry of Commerce.

## Government Consultation: Substantive Development

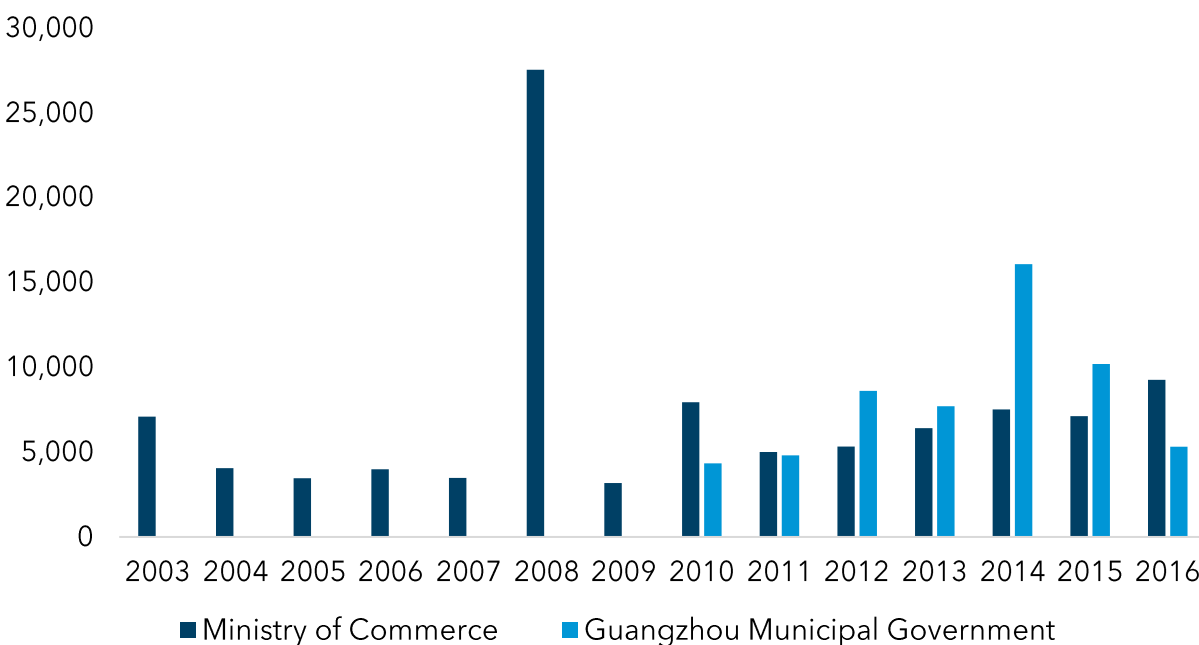
The level of detail of Ministry of Commerce and Guangzhou Municipal Government policy proposals points to rapid substantive development that has been sustained over the years. Among the Ministry of Commerce consultations that solicited comments on draft laws and regulations, the

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<sup>14</sup> Government operations consists of contract management and other issues regarding organizational structures and processes.

average number of characters in proposals is 7,581, with a median of 3,753 characters.<sup>15</sup> For Guangzhou Municipal Government consultations, the average number of characters is 9,771, with a median of 7,099 characters.<sup>16</sup> As Figure 2 illustrates, the draft laws and regulations of both organizations have been relatively lengthy throughout the period under analysis, never dropping below an average of 3,000 characters on an annual basis. Such patterns are indicative of the institutionalization of detailed policy proposals at the Ministry of Commerce and Guangzhou Municipal Government.

Figure 2: Number of Characters in Policy Proposals, By Year



*Note:* The y-axis represents the average number of characters in policy proposals in a particular year. 2002 is not included in the figure because no Ministry of Commerce consultations soliciting comments on draft laws and regulations occurred in that year. 2008 is an outlier for the Ministry of Commerce because of an unusually lengthy proposal (nearly ten times the number of characters of the second-longest proposal) that was circulated that year.

## Government Consultation: Standardization of Best Procedures

A core procedural element of online consultation is the duration of comment periods. Among Ministry of Commerce consultations that solicited comments on draft laws and regulations, the

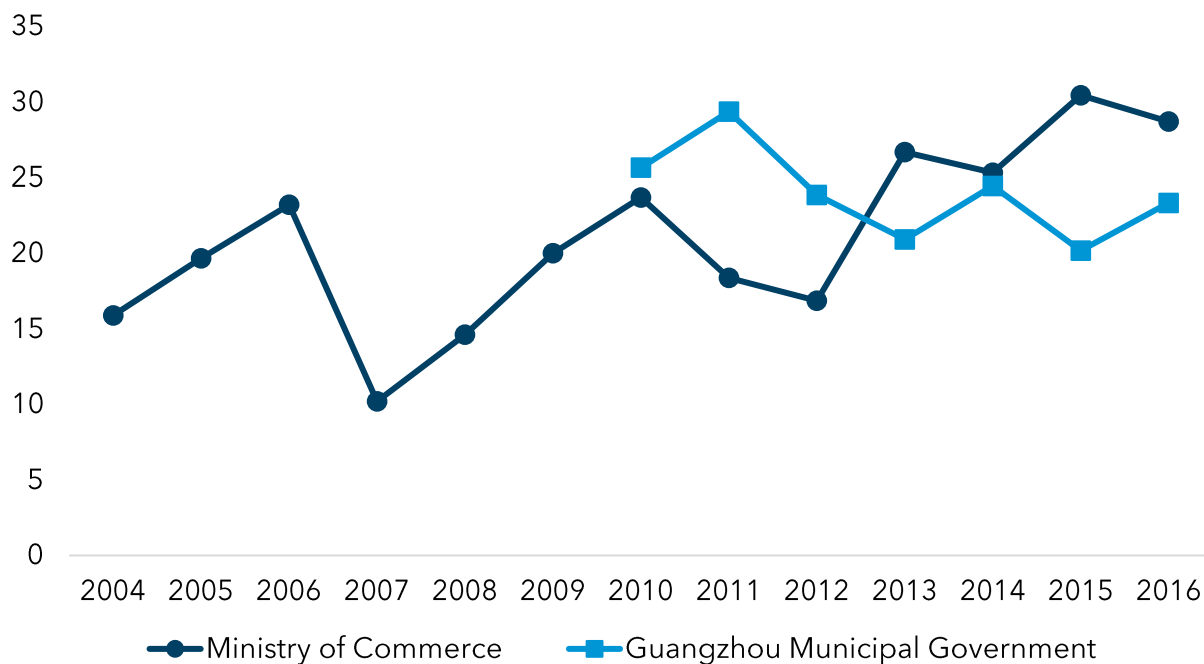
<sup>15</sup> Assuming a ratio of 1,000 Chinese characters to 650 English words ([http://www.tianhengtranslations.com/word\\_count.htm](http://www.tianhengtranslations.com/word_count.htm)), the estimated average English word count is 4,928, with a median of 2,439 words.

<sup>16</sup> Lengthy proposals have been standard occurrences across all 13 policy areas in which the Guangzhou Municipal Government has conducted consultations.

mean duration is 22 days with a median of 20 days. As Figure 3 illustrates, the duration of comment periods has gradually increased through the period during which the Ministry of Commerce has utilized online consultation. Since 2013, the average duration has approached 30 days, the amount of time for public feedback recommended in Chinese government procedures (Horsley 2018).<sup>17</sup> The Ministry of Commerce’s setting of the duration of comment periods has therefore institutionalized in a manner consistent with specified best procedures.

As Figure 3 illustrates, similar patterns hold for the years during which the Guangzhou Municipal Government has utilized online consultation. Across all draft laws and regulations, the most common duration for comment periods is 30 days, with nearly two-thirds of comment periods lasting for 25 days or longer. A small number of comment periods are exceptions, with durations of two weeks or shorter. The majority of these brief comment periods (which have the effect of reducing the annual averages reported in Figure 3) are associated with proposals concerning government operations. Apart from such exceptions, Guangzhou Municipal Government practices regarding the duration of comment periods have institutionalized in a manner consistent with Chinese government procedural recommendations (Horsley 2018).

Figure 3: Duration of Comment Periods, By Year



*Note:* The y-axis represents the average number of days of comment periods in a particular year. 2003 is not included in the figure because information about comment period duration is not available for that year.

<sup>17</sup> As a point of reference, the recommended duration for comment periods in the United States is 60 days for significant actions and 30 days for other proposals (Administrative Conference of the United States 2011).

## Public Participation: Persistence

Of the 189 Ministry of Commerce consultations that solicited public feedback on draft laws and regulations, comments were available for 135 policy proposals. A similar pattern holds for Guangzhou Municipal Government consultations, in that comments were extracted for 80 of 137 proposals. For the remaining consultations, there are two explanations—among which definitive adjudication is not readily apparent—for the absence of comments. Either the Ministry of Commerce and Guangzhou Municipal Government did not post feedback to their websites or no comments were submitted in response to these 54 and 57 proposals, respectively.

There are no substantive or procedural differences regarding the characteristics (e.g., level of detail of proposal, duration of comment period) of consultations for which comments were available and consultations for which no feedback was extracted. One exception concerns the time period during which the consultation occurred. For both the Ministry of Commerce and Guangzhou Municipal Government, comments were generally not visible for the first several years during which online consultation was utilized. In subsequent years, by contrast, comments were accessible for the majority of consultations. This pattern indicates that the submission and posting of comments has become an institutionalized, albeit not universal, feature of online consultation at the Ministry of Commerce and Guangzhou Municipal Government.

As Figure 4 illustrates, the number of public comments generated by Ministry of Commerce draft laws and regulations is typically rather modest. Of the 135 policy proposals with visible feedback, the average number of comments was 20, with a median of 7 comments.<sup>18</sup> Only five proposals received in excess of 100 comments. These proposals share no obvious characteristics in common, addressing such issues as direct marketing, food safety, and the scrapping of motor vehicles.

The volume of public comments submitted during Guangzhou Municipal Government consultations is for the most part consistent with these patterns. As Figure 4 illustrates, participation was limited to the submission of a small number of comments (i.e., 50 or fewer) in response to the vast majority of draft laws and regulations. Of the 80 policy proposals with available feedback, the average number of comments received by the Guangzhou Municipal Government was 114, substantially higher than the mean of 20 for Ministry of Commerce consultations. This relatively large average reflects the fact that two proposals generated volumes of comments that were orders of magnitude greater than the feedback induced by other consultations. The largest volume—4,807 comments—came in response to a proposal requiring elementary schools to provide after-school programs. Although parents strongly supported this

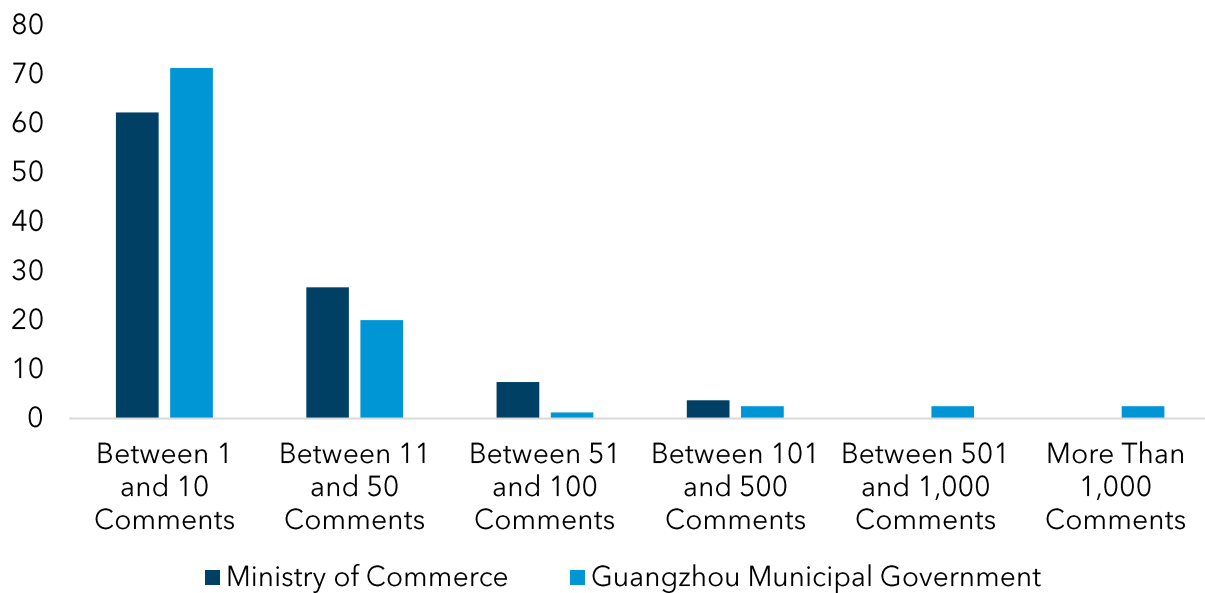
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<sup>18</sup> In 2008, by contrast, a health system reform policy proposal received nearly 30,000 comments (Balla 2012). In 2011, approximately 83,000 comments were submitted in response to a draft income tax law (Ford 2012). As these examples illustrate, online consultation is in particular contexts characterized by large volumes of public comments.

proposal, teachers (who were to staff the programs) expressed firm opposition. Public interest was also unusually high regarding the sale and use of motorcycles and other vehicles (e.g., electric bicycles), as evidenced by the fact that the Guangzhou Municipal Government received 1,782 comments during the feedback period for this consultation.

The volume of public feedback generated by Ministry of Commerce and Guangzhou Municipal Government policy proposals has not increased over the years. For example, Ministry of Commerce draft laws and regulations that were proposed in 2010 or earlier received a median of 7 comments per consultation, a slightly larger number than consultations occurring between 2011 and 2016 (for which the median was 6 comments). In both organizations, the median volume of comments has remained stably modest, generally not exceeding 10 comments per consultation on an annual basis. This consistent absence of large volumes of feedback (only occasionally disrupted by outlying occurrences) is indicative of a lack of institutionalization of persistent public participation in Ministry of Commerce and Guangzhou Municipal Government consultations.

Figure 4: Number of Comments on Policy Proposals



*Note:* The y-axis represents the percentage of policy proposals receiving a particular range of comments.

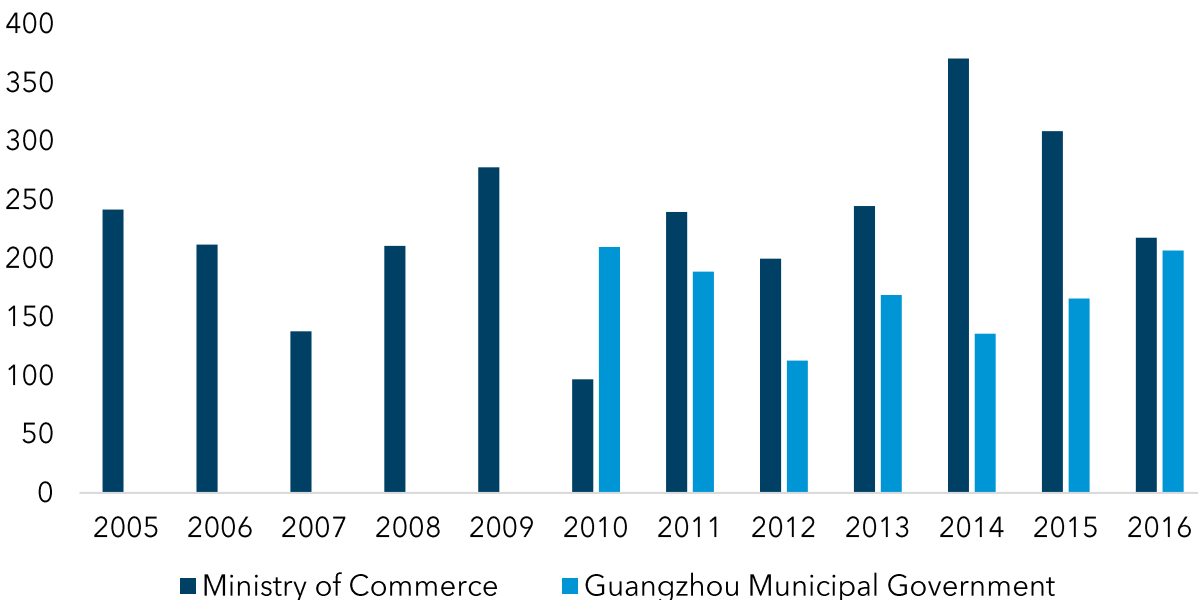
### Public Participation: Substantive Development

Public comments are typically relatively short in length and, therefore, do not provide detailed feedback on Ministry of Commerce and Guangzhou Municipal Government draft laws and

regulations.<sup>19</sup> For the Ministry of Commerce, the average comment consisted of 230 characters, with a median length of 129 characters. The corresponding measures were 135 and 110 characters, respectively, for comments submitted in response to policies proposed by the Guangzhou Municipal Government. As Figure 5 illustrates, neither organization has experienced a sustained increase in comment length over the years during which consultations have been conducted. This ongoing prevalence of comments not offering detailed feedback on draft laws and regulations is indicative of a lack of substantive development (i.e., breadth and depth) in public participation practices in online consultation at the Ministry of Commerce and Guangzhou Municipal Government.

Although the common practice of the submission of brief comments was established early on in the implementation of online consultation, the Ministry of Commerce and Guangzhou Municipal Government occasionally receive detailed feedback on draft laws and regulations. One comment submitted to the Guangzhou Municipal Government exceeded 1,000 characters in length. Such detailed feedback is a more regular occurrence at the Ministry of Commerce, which received 90 comments longer than 1,000 characters and two comments surpassing 2,000 characters. The two longest comments were submitted (in 2005 and 2006, respectively) by the Changan Ford Automobile Company (2,436 characters) and a Shanghai marketing consulting firm (2,003 characters).

Figure 5: Length of Public Comments, By Year



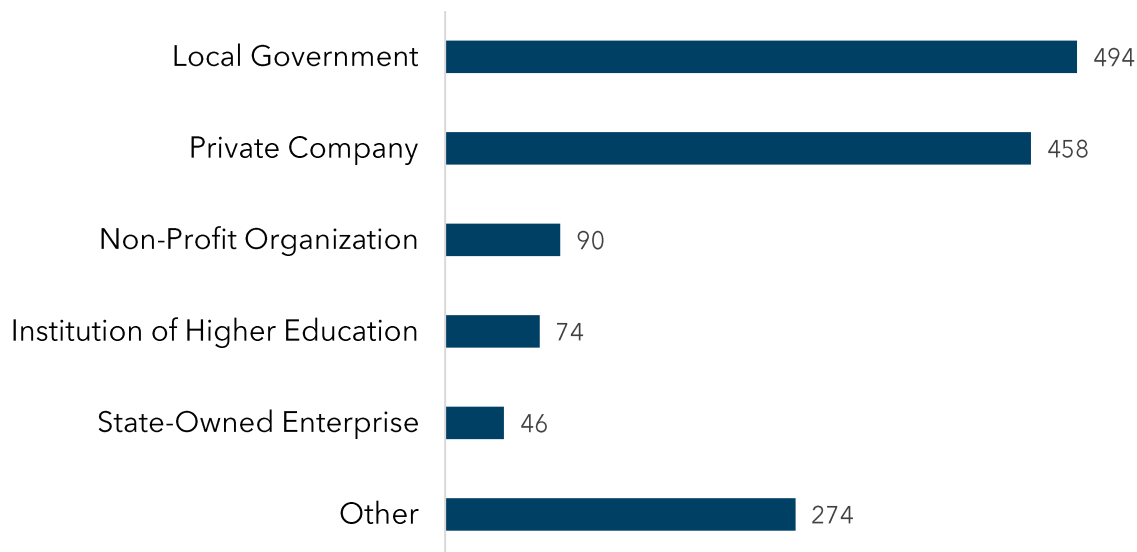
<sup>19</sup> The vast majority of Ministry of Commerce comments (2,656 of 2,820) were submitted in response to draft laws and regulations, as opposed to announcements of intergovernmental meetings and other types of actions. The analysis focuses on these policy proposal comments.



*Note:* The y-axis represents the average number of characters of public comments submitted in a particular year. 2005 is the first year for which the texts of comments on draft laws and regulations are available on the Ministry of Commerce’s website.

During the submission process, participants in Ministry of Commerce consultations are given the option of identifying the organization with which they are affiliated.<sup>20</sup> Approximately half of the commenters provided this information in the period under analysis. As Figure 6 illustrates, the Ministry of Commerce received feedback from a diverse array of work units—local governments, private companies, non-profit organizations, institutions of higher education, and state-owned enterprises. For example, the Bureau of Commerce of Guigang Municipality, a port city in Guangxi Province, submitted a comment in response to a proposed policy on the regulation of the warehouse storage industry.

Figure 6: Organizational Affiliation of Ministry of Commerce Participants



*Note:* The vast majority of comments in the “Other” category did not specify an organizational affiliation, but rather entered into this field “individual” or some other statement of self-identification.

Each Ministry of Commerce policy proposal comment was coded for the referencing of professional knowledge and information. The following excerpt provides an example of a comment that cites occupational expertise: “I am a lawyer from the Shanghai Huguang Law Firm. I am delighted that the Ministry of Commerce is soliciting feedback on the proposed and much-needed Foreign Investment Law. As a lawyer, I have some comments on the ‘national security

<sup>20</sup> The Guangzhou Municipal Government does not provide interested parties with such an opportunity.

screening system' that is mentioned in the draft law." This comment (submitted in 2015) addresses national security concerns regarding foreign investment in China, referencing the legal framework in the United States as a potentially useful guidepost for the Chinese government.

Despite the fact that participants reported a diverse array of organizational affiliations, only seven percent of public comments submitted to the Ministry of Commerce contained expressions drawn from occupational experiences. Private companies and local governments were the most common types of organizations to reference specialized expertise in their comments. Such comments were approximately twice as lengthy on average as submissions not incorporating professional information. The prevalence of comments informed by occupational expertise has not increased over the years, an indication of a lack of institutionalization in the transmission of substantive knowledge on the part of participants in Ministry of Commerce consultations.

The referencing of professional expertise was also uncommon in feedback received by the Guangzhou Municipal Government. Only six percent of public comments contained information derived from occupational experiences, a prevalence that has not increased through the years.<sup>21</sup> The following excerpt offers an example of the transmission of profession-specific knowledge to the Guangzhou Municipal Government: "As a newspaper courier, I do not support a prohibition on electric bicycles. This restriction would be devastating to our industry and others that rely heavily on electric bicycles. Electric bicycles reduce our delivery times in half and make our work less arduous. If this proposal is enacted, our efficiency will decrease and our workload will increase dramatically."

It is perhaps surprising that relatively lengthy comments conveying specialized professional information are not a more common occurrence at the Ministry of Commerce than the Guangzhou Municipal Government. National economic affairs—such as foreign trade—naturally draw the attention of industries and organizations affected by government policies. By contrast, public matters addressed at the level of local government are typically salient for citizens concerned about the quality of their everyday lives. The following excerpt illustrates such personal concerns: "I am an only child, and my husband had a brother who passed away when he was young. Under Shanghai regulations, my husband is considered an only child. The Guangdong Provincial Health and Family Planning Commission, however, says that my husband does not count as an only child. My husband's parents did not in fact raise two children. I suggest revising the provincial family planning policy to treat this circumstance as an only child for childbearing purposes."

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<sup>21</sup> The expression of professional expertise was not coded for all 9,098 comments extracted from the Guangzhou Municipal Government's website. Rather, the analysis is based on a stratified sample of 1,097 of these comments. At least 20 comments were randomly selected for each consultation. For consultations that generated fewer than 20 comments, all comments were coded.

As a means of assessing the sentiment of public comments toward Ministry of Commerce and Guangzhou Municipal Government draft laws and regulations, submissions were coded according to a five-point scale.<sup>22</sup> The categories of this scale are very positive, positive, neither positive nor negative (neutral), negative, and very negative. The scale summarizes the overall sentiment of comments toward the policy proposals in response to which they were submitted. If a comment does not render either a positive or negative judgment, then the submission is coded as neutral. A submission is also deemed neutral if the comment contains roughly equivalent expressions of both positive and negative sentiment. If the positive tone in the comment outweighs the negative sentiment, then the submission is coded as positive, and vice versa if negative tone is more pronounced than positive sentiment.

As Figure 7 illustrates, public comments submitted to both the Ministry of Commerce and Guangzhou Municipal Government articulate a broad array of substantive positions. Fifty-three percent of Ministry of Commerce comments and 38 percent of Guangzhou Municipal Government submissions did not express predominantly positive or negative sentiments regarding draft laws and regulations. The following excerpt, for example, communicates information about a proposed Ministry of Commerce liquor distribution management policy without directing praise or blame toward the draft itself: “It is difficult to enforce alcohol distribution rules at the county level when wholesalers do not obtain the necessary documents from local commerce officials.”

For the Ministry of Commerce, approximately one-third of public comments expressed negative sentiments, roughly double the percentage of submissions stating support for policy proposals. For the Guangzhou Municipal Government, nearly half of the comments articulated opposition toward proposals, while only 12 percent of submissions exhibited positive sentiments.<sup>23</sup> Some negative comments were rather strident in their opposition to draft laws and regulations, as illustrated by the following excerpt from a Guangzhou Municipal Government consultation on the classification of household waste: “I object! Rather than squander departmental resources classifying household waste, it would be better to promote even-odd driving restrictions. You government leaders should leave your offices, come outside, and take a look at the sky in Guangzhou. I hope that after you see how bad the air is, you can maintain those smiles on your faces.”

The relative prevalence of public comments expressing negative, as opposed to positive, sentiments has persisted throughout the respective periods during which the Ministry of Commerce and Guangzhou Municipal Government have utilized online consultation.<sup>24</sup> For example, positive

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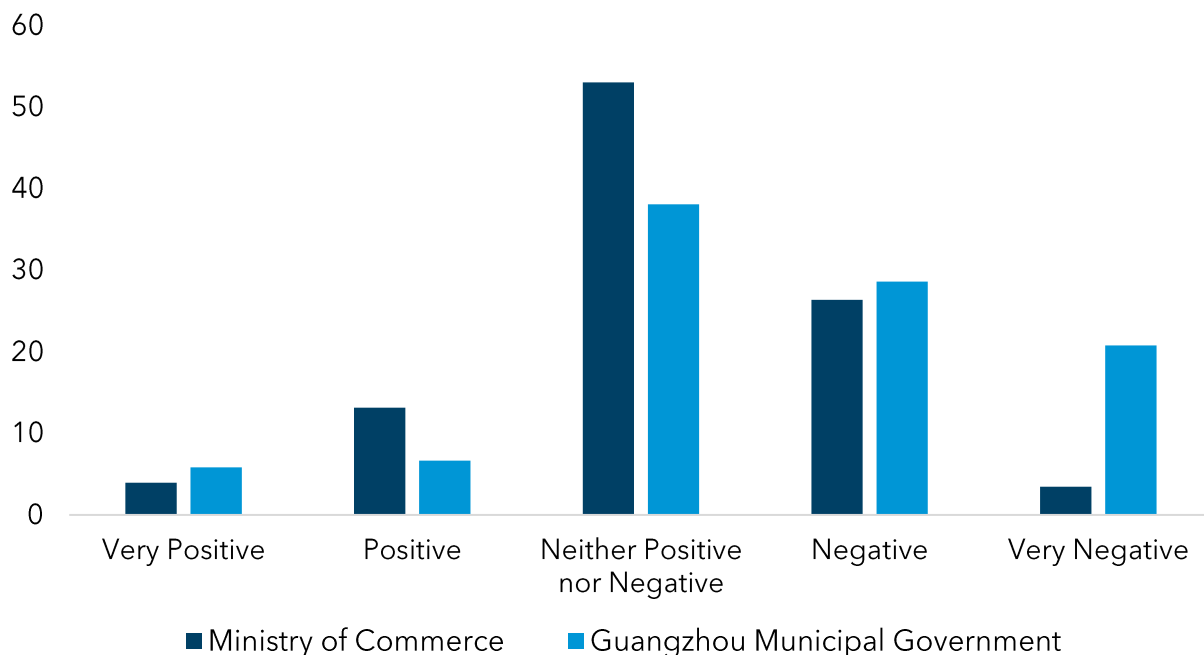
<sup>22</sup> All Ministry of Commerce policy proposal comments and the stratified random sample of Guangzhou Municipal Government comments described above were analyzed for sentiment.

<sup>23</sup> The relative prevalence of negative comments at the Guangzhou Municipal Government is primarily the result of objections expressed by large numbers of teachers toward the after-school proposal highlighted earlier. These objections constitute half of all negative comments submitted to the Guangzhou Municipal Government.

<sup>24</sup> This pattern in sentiment also holds across comments of varying length, professional expertise, and subject matter.

comments have never exceeded 28 percent of submissions on an annual basis at either organization. In contrast, negative comments have constituted a majority of submissions in particular years at both organizations. Such patterns demonstrate that feedback expressing a variety of substantive viewpoints, including opinions critical of proposed policies, is an institutionalized feature of public participation in online consultation at the Ministry of Commerce and Guangzhou Municipal Government.

Figure 7: Sentiment of Public Comments



*Note:* Each bar represents the percentage of public comments expressing a particular type of sentiment.

### Summary of Analysis

Taken together, the analysis of policy proposals and public comments points to the conclusion that the consultation practices of the Ministry of Commerce and Guangzhou Municipal Government have institutionalized (defined and measured as persistence, substantive development, and standardization of best procedures) to a greater extent than the citizen participation that occurs in response to draft laws and regulations. Online consultation has been utilized frequently over the years by both organizations. The Guangzhou Municipal Government has been particularly persistent in conducting consultations across policy areas. At both organizations, draft laws and regulations are typically substantive (composed of large numbers of characters) and procedures are routinely robust (the duration of comment periods is consistent with recommended government practices). Over time, both the Ministry of Commerce and Guangzhou Municipal Government have regularized the practice of making comments publicly available on their websites.

By contrast, the public participation generated by Ministry of Commerce and Guangzhou Municipal Government consultations is limited both in persistence and substantive development. The number of comments submitted in response to policy proposals is typically rather modest, particularly in the context of Ministry of Commerce consultations. Comments for the most part are relatively short in length (especially feedback received by the Guangzhou Municipal Government) and do not communicate professional knowledge and information. One dimension along which robust feedback practices have developed concerns the sentiment of comments. At both the Ministry of Commerce and Guangzhou Municipal Government, participants regularly offer feedback drawn from a range of perspectives, including opposition (sometimes strident) to draft laws and regulations.

## Transparency, Public Involvement, and Incremental Governance Reform

This article has analyzed the operation of online consultation, a prominent instrument of governance reform in contemporary China.<sup>25</sup> The analysis has specifically focused on institutionalization—the persistence, substantive development, and standardization of best procedures in online consultation. By coding and analyzing hundreds of policy proposals and thousands of public comments, the article has generated insight into the process and substance of online consultation at the Ministry of Commerce and Guangzhou Municipal Government, two organizations at the forefront of the implementation of this governance reform. As discussed below, the article’s findings regarding the institutionalization of government and citizen behavior carry implications for the extent to which online consultation bolsters transparency and public involvement in the policymaking process or, alternatively, serves merely to provide a veneer of popular legitimacy to authoritarian decisions (Dickson 2011; Ergenc 2014; Gallagher 2006; Tang 2014).

The regular, ongoing circulation of draft laws and regulations by the Ministry of Commerce and Guangzhou Municipal Government demonstrates the possibilities of online consultation as a persistent governance reform. Online consultation has routinized the dissemination of detailed information about policy proposals, thereby institutionalizing a form of transparency that has not historically characterized policymaking in China (Wang 2008). Although it is plausible that the

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<sup>25</sup> The salience of transparency and public involvement reforms was evident at the Fourth Plenary Session of the 18th Communist Party of China Central Committee (held in Beijing on October 20-23, 2014), which focused on strengthening the rule of law. A crucial component of the rule of law, as articulated at the Fourth Plenum, is transparency in government decision making (Xinhua News Agency 2014b). One month prior to the Fourth Plenum, President Xi Jinping, in an address honoring the 65th anniversary of the Chinese People’s Political Consultative Conference, praised consultative democracy, a process through which the Party draws upon the “wisdom and strength of the entire nation to pursue wide consensus” (Xinhua News Agency 2014a).

Ministry of Commerce and Guangzhou Municipal Government will continue to post proposals to their websites in the years ahead, it is not yet certain (and therefore a concern for future research) the extent to which online consultation enhances transparency more generally across organizations and levels of government.

The article offers a mixed assessment of public participation in online consultation, based on the experiences of the Ministry of Commerce and Guangzhou Municipal Government. Although interested parties are routinely given ample opportunities to comment on draft laws and regulations, the volume and professional expertise of feedback is for the most part rather modest. The transmission of legal, economic, scientific, and technical information regarding particular aspects of policy proposals—a core substantive element of institutionalized participation throughout the world (Yackee 2012)—is therefore not a common occurrence in online consultation at the Ministry of Commerce and Guangzhou Municipal Government. By contrast, another substantive attribute of institutionalized participation—the communication of political information (e.g., sentiment) (Yackee 2012)—is present to a significant extent in the feedback under analysis. Participants in Ministry of Commerce and Guangzhou Municipal Government consultations do not hesitate to express directional opinions, including viewpoints unfavorable toward draft laws and regulations. The relative prevalence of feedback articulating negative (as opposed to positive) sentiments—although perhaps unexpected in authoritarian policymaking (He 1997)—appears to be a widespread phenomenon in online consultation in China, as case studies conducted in a variety of policy areas have uncovered similar patterns (Balla and Liao 2013; Ford 2012).

Given the regular occurrence of negative feedback, online consultation has the possibility of operating as a “safety valve” in Chinese politics (Chen 2016). According to this notion, public participation in government decision making, particularly feedback that challenges the status quo and proposed courses of action, provides citizens with opportunities to “blow off steam” and therefore relieves bottom-up pressure on the Chinese government. The efficacy of such pressure relief, however, is in part contingent on the responsiveness of policymakers to citizen feedback, as unmet expectations run the risk of fostering deep discontent with government accountability and performance (Dickson 2011; Gallagher 2006). Although this article does not examine the responsiveness of the Ministry of Commerce and Guangzhou Municipal Government to public comments, case studies provide examples of consultations in which feedback is associated with changes in the content of draft laws and regulations (Ford 2012; Kornreich 2018). A concern for future research is assessing government responsiveness to public participation on a more general basis.

Although issues under the jurisdiction of the Ministry of Commerce and Guangzhou Municipal Government are at times contentious, neither organization primarily addresses policy concerns that immediately threaten the legitimacy of the CCP. In general, online consultation has been implemented—with a number of notable exceptions (Ford 2012; Wee, Martina, and Pomfret 2015)—by government organizations operating in areas characterized by an absence of

fundamental political sensitivities (Balla 2017). These parameters highlight a broad limitation of online consultation as a governance reform. Online consultation has operated as an incremental advance in transparency and (to a lesser extent) public involvement. Online consultation has not, in other words, transformed the policymaking process or compromised the CCP's dominance over the setting of the political agenda in China. In the end, the experiences of the Ministry of Commerce and Guangzhou Municipal Government showcase both the possibilities and overarching constraints of governance reform—including instruments that have in some respects institutionalized—in the contemporary Chinese political system.

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