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From Quiet to Noisy Politics: Varieties of European Reactions to 5G and Huawei

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**Abstract** 

5G networks are at the center of geopolitical competition. The U.S. has denounced market leader Huawei's ability to break into allies' sensitive networks and it has tried to convince Europeans to ban the Chinese group from their 5G markets. How are European governments and industries reacting to

5G politicization?

This article argues that government-industry interactions in the handling of politically salient issues are mediated by the country's political system. In executive-dominated countries, the government would centralize policymaking. In parliament-dominated countries, the government would delegate politically salient issues to the industry to bypass diffuse power-sharing and fragmented coalition-building. The article adds that political economy acts as an intervening variable. In public governance ecosystems, governments and industries interact through informal coordination; in private governance ecosystems, the two actors rely on formal contracting. The empirical analysis focuses on British, Dutch, French and Italian reactions to 5G politicization, yielding favorable results to the hypotheses.

Introduction

5G networks - which allow unprecedented high-speed and high-density connections - could represent the most significant innovation in telecommunications since the advent of the mobile phone. The current 5G market leader is the Chinese firm Huawei, which started investing early in this technology and now outperforms its competitors for number of patents and ability to approach foreign markets. For the first time since WWII, the leading player in disruptive technology is not a Western company or U.S. ally: the Americans Cisco, Intel and Qualcomm are far from catching up with Huawei in 5G, while the two most competitive players are Ericsson (Sweden) and Nokia (Finland). Huawei's competitive advantage has also become a battleground in geopolitical competition, as Washington has denounced Huawei's ability to break into allies' sensitive networks and it has tried to convince European allies to ban the group from their 5G markets. The 5G dossier has then reached an

unprecedented level of public and media attention in Europe and it has constrained policymakers to take public action to address it (Radu & Amon 2021). How are European governments and industries reacting to 5G politicization, Huawei's market penetration, and U.S. political pressure?

This research question has broad implications to gauge how governments and industries interact in the policymaking process and govern politically sensitive industries. Telecommunications are part of so-called network industries, along with transportation (railways, air space), energy supply (electricity, gas) and postal services, complex technical areas characterized by high entry market barriers and concentration around few industrial players (Wassum & De Francesco, 2020). The literature on geoeconomics has recently highlighted that these strategic sectors are now at the center of international competition, generating diplomatic and political repercussions and strong pressures for policymakers to protect sensitive industries. This politicization of strategic sectors would lead towards executive-driven and centralized policymaking (Csurgai 2018, p. 43; Roberts, Choer Moraes & Ferguson, 2019, pp. 21-22; Gertz & Evers, 2020, pp. 129-131). Scholarly works on political salience are also helpful to understand how governments and industries manage politically salient issues. In a seminal work on corporate governance, Culpepper (2011) argued that when politics in technical issue-areas of low public interest depart from its default quiet setting and become "noisy", industry interests lose their grip on the policy agenda. Other studies have highlighted, for instance, how "quiet" financial regulation (usually led by business interests) became politically salient after the 2008 financial crisis, gradually leading to more executive-driven policymaking (Bell & Hindmoore, 2017). These two research strands converge on the assumption that politically salient issues lead towards executive-driven and centralized policymaking.

With the objective to nuance this prevailing assumption, the article posits that government-industry interactions in moments of "noisy politics", are decisively mediated by the country's political system. Specifically, the article distinguishes between executive-dominated and parliament-dominated countries. In the former – characterized by power centralization and rapid coalition building – I expect the government to wield more influence over policymaking. In the latter, I hypothesize the government to delegate politically salient issues to the industry to bypass diffuse power-sharing and a more fragmented government's coalition-building. Politically salient issues in strategic sectors require a rapid and politically cohesive response that is difficult to achieve in parliament-dominated countries.

If the macro-distinction between different political systems allows identifying who exerts more influence in moments of "noisy politics", the article argues that the country's predominant model of political economy acts as an intervening variable, significantly impacting on government and corporate strategies in governing politically sensitive industries. Drawing on the analytical distinction between public and private governance developed by Calcara and Marchetti (2021), I expect strategic and informal coordination between governments and industries in countries with predominantly public governance of strategic sectors. In private governance ecosystems, I expect more reliance on formal contracts.

To test these research hypotheses, I focus on two executive-dominated (France and the U.K.) and two parliament-dominated countries (Italy and the Netherlands). Case selection allows also to investigate two predominantly public (Italy and France) and two private governance ecosystems (the Netherlands and the U.K.). The empirical analysis on European reactions to 5G politicization yields favorable results to the research hypotheses.

The article provides three main scholarly contributions. First, it advances the theoretical reflection on how governments and industries respond to politically salient issues and on the connections between political systems, political economies, and variations in policymaking processes. Specifically, the article cautions against a homogeneous formulation of the nexus between executive power, high politics, and policymaking. To a large extent, politically salient decisions are shaped by different political systems and political economies and, in turn, characterized by significant cross-national variations. Second, the proposed theoretical framework can be arguably extended to understand how Western democracies govern policy-areas that need close government-industry coordination (Guidi, Guardiancich, & Levi-Faur, 2020; Weiss, 2020). This reflection is particularly timely as an increasing number of sectors are now deemed as "strategic" to minimize vulnerabilities in the international economy (Farrell & Newman, 2019). The 5G dossier seems an extreme case of politicization as it is simultaneously impacting all European countries, but, arguably, it it will not be the last one, as shown by Chinese firms penetrating the robotics market in Germany (Stanzel, 2017) or the semiconductor industry in the U.K. (Payne, 2021). Third, a detailed analysis of Europeans' reactions to Huawei's penetration sheds light on the complex interaction between market and security considerations vis-àvis U.S. and China and, ultimately, it contributes to the debate on European strategic and technological sovereignty.

The article is organized as follows: the next two sections present the theoretical framework, research design and methodology. The third zooms in on how France, U.K., Italy, and the Netherlands react to the politicization of the 5G sector. The fourth section discusses the research findings. Conclusions follow.

## 1. Conceptualizing Government-Industry Interactions in Noisy Politics

Given its technical nature and the presence of information asymmetries between few industrial players and the state, the day-to-day governance of telecommunications is usually off the political radar and managed by a small circle of industry experts and technicians (Thatcher, 2007, p. 149). Yet, this sector has recently been at the center of the political debate, both because of ongoing digital innovations and for its importance for technological, intelligence and cybersecurity competition (Weiss & Jankauskas, 2019). In this regard, the scholarly literature on geoeconomics suggests that politicization of high-technology sectors is leading towards more executive-driven and centralized policymaking (Csurgai, 2018, p. 43; Roberts, Choer Moraes & Ferguson, 2019, pp. 21-22; Gertz & Evers, 2020, pp. 129-131). The political salience research strand converges on this point, as politically salient issues lead the government to directly intervene in a policy area and progressively marginalize the industry's role. As effectively summarized by Culpepper (2011, p. 7), business power goes down as political salience goes up.

With the objective to nuance this prevailing argument, I posit that a country's political system exerts a profound influence on government-industry interactions when it comes to politically salient issues, i.e., when issues move from being technical and obscure to the public into the center of political debate, constraining political actors to take public actions to address them. Specifically, I distinguish between executive-dominated and parliament-dominated countries to identify which actor (the government or the industry) wields greater influence over policymaking. The conceptual distinction draws on Lijphart's work on executive-parliament relations (2012, pp. 105-129) and their impact on agenda-setting and policymaking (see Tsebelis, 2002, pp. 161-168). This article focuses on two macro-dimensions of executive and parliament-dominated countries: power-sharing and coalition building. In parliament-dominated countries, multiple parties tend to share office, often moving frequently in and out of governing coalitions (Ganderson, 2020, p. 206). Moreover, coalition building is often slow and fragmented because it is necessary to accommodate different ideological backgrounds and potentially contradictory political incentives to cooperate with their coalition

partners. In contrast, in executive-dominated countries, power-sharing tends to be more concentrated and coalition-building - which usually takes place within the ruling party itself - tends to be relatively faster compared to parliament-dominated countries (see table 1).

Table 1: Parliament vs Executive-Dominated Countries

	Parliament-Dominated	<b>Executive-Dominated</b>
Power-Sharing	Diffused	Concentrated
Coalition-Building	Slow/Fragmented	Rapid

This analytical distinction leads to two conjectures. First, in executive-dominated countries, I expect the government to centralize the policymaking process when an issue moves up in the political agenda. In accordance with the argument that links political salience with executive-driven centralization, business interests would lose their grip on the policy agenda, and the government would centralizepolicymaking. On the contrary, in parliament-dominated countries - characterized by diffuse power-sharing and fragmented coalition-building - I expect that politically salient issues will be delegated to the industry. This is for two interrelated reasons: first, for coalition governments in parliament-dominated countries, delegation to the industry is a way to depoliticize and bypass different political preferences, allowing coalition partners to prevent a political crisis and stay in power. Second, strategic decisions require a rapid and politically cohesive response that is difficult to reach when coalition-building is slower and fragmented (Ganderson, 2020, pp. 206-207).

If the political system configuration helps to identify which actor exerts more influence on policymaking, political economy acts as a key intervening variable that enables or constrains a country's set of policy options. In this article, I borrow a typology recently elaborated by Calcara and Marchetti (2021) that distinguishes between public and private governance ecosystems. This distinction combines the Varieties of Capitalism literature, and its focus on formal institutions and firm-to-firm interactions (Hall & Soskice, 2001), with research on state-to-firms interactions and informal patterns of coordination between public and private actors (Clift & Woll, 2012; Weiss, 2020). Public governance ecosystems are characterized by strategic coordination between governments and corporate actors and firms depend more heavily on informal relationships to coordinate their endeavors with other actors. The gradual transformation of state-owned network industries into private companies has not prevented the preservation of informal pathways of interaction between government and corporate actors, often oiled by educational and professional homogeneity (Calcara & Marchetti, 2021, pp. 4-5; Clift & MacDaniels 2021). Private governance

ecosystems are instead characterized by standard market relationships and enforceable formal contracts (see table 2). In these contexts, the state sets detailed legal frameworks, leaving businesses to operate within them (Hall & Soskice 2001, p. 18). I expect, then, that governments and industries in public governance ecosystems will decide to coordinate their activities through informal networks, while private governance ecosystems - in the absence of informal tools of coordination - will rely on formal contracts (Weiss, 2020).

Table 2: Public vs Private Governance Ecosystems

	<b>Public Governance Ecosystems</b>	S Private Governance Ecosystems	
Ownership of supplier	Predominantly Public	Private	
Rules governing	Monopoly for supply to final	Rules designed to ensure	
suppliers	users	competition	
Allocation of regulatory	Formally or informally with state	Regulatory agencies and	
powers	officials	governments	
Relations between	Strong informal networks Distant - little government role		
governments and	between government and	internal working of suppliers	
suppliers	suppliers		

The article argues that political system configurations and political economies impact on policymaking processes. The goal is not to predict policy outcomes. Yet, investigating policymaking processes is important to gauge how political and economic systems influence the governance of high technology infrastructures and strategic sectors.

For the scope of the article, I derive four specific research hypotheses:

- 1) In executive-dominated countries characterized by a public governance ecosystem, I expect the government to centralize the policymaking process. I also expect informal coordination between governments and industries.
- 2) In executive-dominated countries characterized by a private governance ecosystem, I expect the government to centralize the policymaking process. I also expect that the government will set detailed and formal legal frameworks, leaving businesses to operate within them.
- 3) In parliament-dominated countries characterized by public governance ecosystem, I expect that highly political decisions will be mainly delegated to the industry itself. Moreover, I also expect informal coordination between governments and industries

4) In parliament-dominated countries characterized by private governance ecosystems, I expect that highly political decisions will be mainly delegated to the industry itself. Yet, I also expect the lack of informal coordination between governments and industries and reliance on formal contracting.

## 2. Research Design and Operationalization

The analysis focuses on two executive-dominated (France / U.K.) and two parliament-dominated (Italy / Netherlands) countries (Tsebelis, 2002, pp. 161-168; Lijphart, 2012, pp. 120-121). To be sure, different constitutional configurations and historical practices lead to different degrees of executive dominance. The British prime minister, as the expression of a single-party majority, has nonetheless to come to political compromises with various branches of the ruling party, usually represented by the backbenchers in the Parliament. The French president is instead elected with a different electoral formula (in the context of a semi-presidential system) and has historically enjoyed more autonomy vis-à-vis the prime minister or the parliament (Lijphart, 2012, pp. 114-116). Similarly, Italy and the Netherlands, despite being both associated with parliament-dominated countries, have different interest intermediation systems (more corporatized in the Netherlands than in Italy) and different degrees of coalition stability (more unstable in Italy than in the Netherlands). These considerations nuance the rigid distinction between executive-dominated and parliament-dominated countries by adding additional country-level specifications to be used in the research design's operationalization.

This case selection also allows examining two public (France / Italy) and two private governance ecosystems (U.K. / Netherlands). To make this distinction, I rely on the varieties of capitalism and state-business scholarship, which highlights the proximity between French and Italian state-led models sustained by close and informal state-industry relations (Schmidt, 2009; Clift & MacDaniels 2021). The U.K. is classified as a liberal market economy with more arm's length state-industry relations, while the Dutch political economy has moved since the 80s from coordinated towards a more liberal market economy (Touwen, 2014). It is therefore possible to account for all possible combinations of the two variables (see table 3).

Table 3: Case-Selection

	<b>Executive-Dominated</b>	Parliament-Dominated
<b>Public Governance</b>	France	Italy

Private Governance	U.K.	Netherlands

The empirical analysis will be structured around qualitative case-studies to test if and how the research hypotheses plausibly functioned as theorized in cases with different conceptual properties (see table 3). To enhance the external validity of the proposed typology, I test my research hypotheses along with the alternative explanation that points to executive-driven centralization in moments of noisy politics.

The empirical analysis investigates the policymaking process in France, Italy, the Netherlands, and the U.K. as regards Huawei's access to 5G networks. Because of the U.S. pressure to ban Huawei, potential Beijing's retaliation in other economic sectors and unprecedented level of public attention—this case can be well defined as a politically salient issue. Moreover, the technical 5G dossier has been politically framed in simple terms as a clear-cut choice between U.S. and China competing alliances. This has spurred domestic debates and resulting pressures for policymakers to take public actions to address the issue (Radu & Amon 2021).

The 5G dossier also allows controlling three important variables to strategically selects cases for analysis that exhibit contrasting outcomes despite their many otherwise similar characteristics. First, even though the EU has published a toolbox (NIS Cooperation Group, 2020), the possibility for Huawei to penetrate European 5G markets essentially remains a national decision that requires complex arrangements between governments and industries. Second, the telecom industry is an ideal testing ground for our comparative effort, as it has been subject to similar European pressures towards liberalization (Thatcher, 2007), and it is structured around few actors that often include a former state-owned company among them (France and Orange; UK and BT; Italy and Telecom Italia; the Netherlands and KPN). Third, the available technology is relatively homogenous across countries (differently, for instance, from the energy industry) and the four countries have arguably similar degrees of vulnerability towards Huawei's leadership in 5G. This also imply that the four countries under observation cannot rely on domestic suppliers as an alternative.

To connect theoretical and empirical analysis, the article disentangles three stages of the policymaking process: quiet politics (2010-2016), politicization (2017-2018) and noisy politics (2019-2021). In the French case, I expect a simultaneous presence of executive centralization and informal interactions between the executive and its domestic industry. In the British case, I

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<sup>&</sup>lt;sup>1</sup> On the impact of the qualitative framing of political salience on its effects on policymaking see Massoc, 2019.

hypothesize a prominence of political actors at the expense of industrial ones (but a greater role of the Parliament compared to France) and formal contracting between government and industries. In both cases, if I will observe that the executive will delegate strategic decisions to the industry or it will follow the industry's lead, the hypotheses will be rejected. For Italy, I expect the government to delegate to the industry with informal interactions. In the Dutch case, I expect delegation to the industry through formal contracting between government and industries. In both cases, I will reject the hypothesis if the executive centralizes the policymaking process (see table 4).

Table 4: Operationalization of the Research Hypotheses

	France	U.K.	Italy	Netherlands
Noisy	Executive	Executive	Delegation to	Delegation to
Politics	Dominance +	Dominance (but with	Industry + Informal	Industry +
	Informal	a greater role of the	executive-industry	Formal
	executive-	Parliament) + Formal	coordination	contracting
	industry	contracting between		between
	coordination	government and		government and
		industries		industries

### 3. Varieties of European Reactions to the Politicization of the 5G dossier

## 3.1. France

In the French case – classified as executive-dominated country and public governance ecosystem - I expect a simultaneous presence of executive centralization and informal interactions between the executive and its domestic industry.

The French telecoms market has been gradually liberalized during the 90s, due to a combination of domestic and European pressures towards competitiveness. The former state-owned France Télècom (now Orange) has been partially privatized (but the state retains a 23% stake), and the other three main companies (Bouygues, Ilhad-Free and SFR) maintain close informal ties with public authorities (Thatcher, 2007, pp. 176-184). The French market has also opened to foreign investments, and the four main companies had all forged partnerships with Huawei to develop 5G networks. Huawei's investments were encouraged by the French government (often by directly benefiting from tax credits on research and innovation).

In 2017-2018, the U.S. began lobbying its European allies to exclude Huawei from 5G. This process of politicization prompted a twofold reaction: first, the management of the 5G dossier became part of President Macron's political battle on European strategic autonomy as a viable alternative to the U.S.-China technological competition. Second, French policymakers aimed for a pragmatic response to avoid a "trade war" with Beijing, underlining that 30% of the entire European telecoms sector was made up of Chinese investments (Procaccia, 2019).

The government initially aimed to delegate to telecoms groups the decision to restrict Huawei's involvement in 5G, also trying to capitalize its leverage and informal ties with the four French service operators. In December 2018, Orange declared the end of its collaboration with Huawei in 5G. Orange's decision was clearly (geo)politically motivated, as admitted by the CEO Stephane Richard's declaration: "I absolutely understand that all our countries, and the French authorities, are preoccupied. We are too" (quoted in Busvine & Barzic, 2018). Yet, Orange was continuing its partnership with Huawei in 5G network outside the French territory. The Chinese company also maintained its collaboration with Bouygues, Ilhad-Free and SFR. French companies' ties with Huawei and the company's leadership in the transition to 5G made decoupling particularly complex, barring economic and competitive losses.<sup>2</sup>

In early 2019, it is possible to observe a clear shift in the handling of the 5G dossier. The government's inability to convince its industry to disengage from Huawei has led to very centralized management of the dossier in the hands of the President with the support of the ANSSI.<sup>3</sup> In February 2019, the government included an amendment in the *Loi Pacte* on foreign investment screening to restrict Huawei's access to the 5G market. However, the Senate rejected it, declaring that the 5G dossier deserved a more in-depth debate. Similarly, telecoms groups lamented the lack of consultation on this strategic market decision (Bergé, 2019). The government then led the process that established the law on 5G equipment security, approved by the French National Assembly and the Senate in summer 2019 and dubbed in public debate as the *Loi Anti-Huawei*. The law states that the Prime Minister, upon the advice of ANSSI, may refuse to grant 5G authorizations if "considers that there is a serious risk of harming national security interests" (French National Assembly, 2019). The law does not mention explicit criteria to accept or refuse 5G authorizations, but it is in any case phasing Huawei

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<sup>&</sup>lt;sup>2</sup> Interview with a French industry executive, 10/05/2021

<sup>&</sup>lt;sup>3</sup> Agence Nationale de la Securite des Systems d'Information

out of the French market with a time horizon of 2028, as it discourages French operators from partnering with Huawei.

The path to approve the law on 5G equipment security has been contested by both the parliament and the industry. Back in February 2019, MPs rejected a first draft of the law because they had not been consulted and explicitly lamented the government's centralization of the 5G dossier. The Senate criticized the executive for transforming a rejected amendment into law without making a bill proposal first, and thus impeding the Parliament to request an impact study or a State Council's opinion (Radu & Amon, 2021, p. 11). Telecoms groups also complained about the lack of a concerted approach on 5G. As Olivier Riffard, director of public affairs of the French telecommunications federation, clearly puts it: "on the 5G, we can regret the somewhat precipitous conditions in which the network security law was introduced in the summer of 2019 with, in our opinion, a lack of anticipation and consultation with the telecom players" (quoted in French National Assembly, 2020). The restrictive nature of the 5G law implies a significant financial cost for companies with preexisting strong ties to Huawei such as Bouygues and SFR, which demanded to be compensated. Even the partially state-owned Orange questioned the government's excessive discretion over 5G authorizations. Orange CEO Stephane Richard, who just a few years earlier aligned with the government's concerns over Huawei, lamented the lack of clarity in the government's handling of the 5G dossier (Bechade, 2019).

The French case largely but not entirely confirms the research hypotheses (see table 5). Paris initially tried to delegate the decision to restrict Huawei's involvement in 5G to the industry, also hoping to take advantage of its close relations with telecoms groups. Yet, the difficult industry's decoupling from Huawei has led the government to take a more centralized approach, prompting protests from parliamentarians and telecoms groups for the lack of consultation.

Table 5: France's reaction to the politicization of the 5G dossier

Quiet Politics (2010-2016)	Close state-industry relations. Huawei's ties
	with the four main companies
Politicization (2017-2018)	U.S. pressure / pragmatic response to avoid a
	trade war
Noisy Politics (2019-2021)	Executive dominance and direct intervention in
	the market

#### 3.2. The U.K.

In the British case, I expect executive dominance (but also a greater role for the Parliament compared to France) and formal government intervention to set detailed legal frameworks.

The U.K. telecoms market has been the forerunner of the process of privatization and liberalization that has affected this sector since the 80s (Thatcher, 2007, pp. 159-173). The UK market has also been one of the most attractive for investment by Huawei, which has built strong business agreements with BT, Vodafone, Three and O2. The Chinese company had also established in 2010 the Huawei Cyber Security Evaluation Centre, as a confidence-building measure to work with British intelligence and to ensure high-security standards.

The 5G dossier was highly politicized in the U.K. between 2018 and 2019. In July 2018, the intelligence chiefs of the U.S., Canada, the U.K., Australia, and New Zealand (the so-called Five Eyes Alliance) reportedly met to make plans to exclude Huawei equipment to operate in their countries. One month later, the U.S. Congress passed a law prohibiting U.S. government agencies from purchasing telecoms and surveillance products from Chinese companies ZTE and Huawei. In the following months, Australia and New Zealand followed this decision. During a visit to London, the US Secretary of State declared that the Conservative Party would be "betraying the legacy of Margaret Thatcher if they opened the door to the Chinese manufacturer" (quoted in Craig 2020).

The U.K. initially adopted a cautious approach, trying to balance intelligence integration within the Five Eyes Alliance with the so-called "golden era" of U.K.-China trade relations. In this context, Ciarian Martin, head of the cyber center of the Government Communications Headquarters (GCHQ), played down any threat of a rift within the Five Eyes alliance and declared that "any decision on Huawei had to take into account Britain's international trading posture" (quoted in Holden & Stubbs, 2019). This position was also shared by the industry: in an interview with CNN Business, a top BT executive said the company has seen no evidence that Huawei poses a security risk (Riley & Burke, 2019).

The Huawei affair took on more dramatic twists and turns within the government led by Theresa May. In April 2019, confidential information was leaked by the press, reporting on the May government's decision to allow Huawei access to non-core parts of the 5G network. The British defense minister, Gavin Williamson, allegedly in favor of a fully-fledged Huawei ban and accused to be responsible

for the leak, was fired shortly afterwards. In July 2019, the House of Commons Science and Technology Committee concluded that "there are no technical grounds for excluding Huawei entirely from the U.K.'s 5G" (Lamb, 2019). Yet, the 2019 "Review of the Telecoms Supply Chain", which was supposed to formalize the distinction between 5G core and non-core systems, did not mention Huawei. The May government's idea was to strategically wait until the elections to leave the buck to the next government.

The new conservative government led by Boris Johnson decided to keep a soft approach towards Huawei. In January 2020, the NCSC announced that "high risk vendors" should restricted up to a 35% market share (NCSC, 2020). The plan was to preserve a market-oriented approach ensuring supply diversification between Huawei, Nokia, and Ericsson. Yet, the government's decision provoked negative reactions from the Parliament. In March 2020, a large group within the Conservative Party began lobbying the government to fully ban Huawei. In June 2020, the "rebellious" Conservative MPs even managed to win a vote in the House of Lords on an amendment seeking to "to prevent companies from using U.K. telecommunications infrastructure to facilitate human rights abuse". In summer 2020, the U.K. government finally decided to ban Huawei from all 5G networks as of 2027. In November 2020, the government decided to fully ban Huawei from September 2021, thus anticipating the timing of the company's exclusion from 5G.

In a few months, parliamentary pressures led to a decisive shift in the British approach towards Huawei. The U.S. and the rebellious fringes of the Conservative Party welcomed the government's decision, while industry was constantly sidelined from the policymaking process (Cerulus & Casalicchio, 2020). Banning Huawei, as admitted by the Secretary of State for Digital, Culture, Media and Sport Oliver Dowden, would have granted the government "unprecedented national security powers" to impose strict terms and conditions on telecoms groups. In front of the House of Commons, Dowden briefly said that the government would "embark on a short technical consultation" with industry leaders, probably suggesting that there had been no deep consultation with operators in the run-up to the decision (Kelion, 2020). U.K. telecoms group strongly lobbied to not fully ban Huawei, not least because of Chinese groups' competitiveness and to being able to diversify suppliers. In January 2020, Hamish McLeod, Director at Mobile U.K., declared that "the mobile industry continues to believe that is in the interest of customers and the U.K.'s desire to be a global leader in 5G that it must have access to a diverse supply chain that is open to the latest and most innovative technologies"

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<sup>&</sup>lt;sup>4</sup> The amendment on the Telecommunications Infrastructure Bill is available here: <a href="https://publications.parliament.U.K./pa/bills/lbill/58-01/107/5801107-R-I.pdf">https://publications.parliament.U.K./pa/bills/lbill/58-01/107/5801107-R-I.pdf</a>

(quoted in House of Commons, 2020, pp. 12-13). Both Vodafone and BT, in written notes sent to the government, complained about the financial cost of switching provider and the risk of increasingly depending on a reduced number of vendors (BT, 2020; Vodafone, 2020).

The British case confirms the hypotheses (see table 6). Political actors centralized the policymaking process, formally intervening on the 5G market at the expense of the industry's requests. Unlike the French case, the British government was strongly influenced by the parliament and by divisions within the Conservative party.

Table 6: U.K.'s reaction to the politicization of the 5G dossier

Quiet Politics (2010-2016)	Liberalized market. Huawei as a privileged
	investor
Politicization (2017-2018)	U.S. and 5 Eyes Alliance strong pressure
Noisy Politics (2019-2021)	Government constrained by intra-party
	fractures and formal market intervention

## **3.3.** Italy

In the Italian case – classified as parliament-dominated country and public governance ecosystem - I expect delegation to industries through strategic and informal channels of interaction.

The telecoms market in Italy was liberalized in the 90s through the concentration of many state-owned corporations into one single company (Telecom Italia) and then its following privatization. Yet, the Italian state has maintained strong relations with the new private owners, and it has included a "golden power" provision to dictate specific conditions and eventually to veto the acquisition of equity investments or takeovers resolutions (Bulfone, 2019, pp. 759-762). Like the French and British cases, Huawei has been the main investor in the Italian telecoms market, creating important ties with Telecom, Vodafone Italia, Fastweb, and Wind.

Huawei's possible involvement in 5G created political divisions within the government coalition. Between 2017 and 2018 the Italian government was indeed paving the way for a major diplomatic agreement with Beijing. On 23 March 2019, Italy and China signed a Memorandum of Understanding, which turned Italy as the first G-7 country to formally join the Belt and Road infrastructural initiative. The Italian government, therefore, was visibly embarrassed when the U.S.

Secretary of State warned Rome to carefully monitor the concessions of 5G networks to Huawei "because every single information that crosses their networks is at risk given that it is a network controlled by the Chinese Communist Party" (quoted in Molinari, 2019).

The two political coalitions that governed Italy from 2018 to early 2021 - the first composed by the Five Star Movement and the League, the second by the Five Star Movement and the Democratic Party - were unable to find common ground on Huawei and 5G. The Ministry of Economic Development (from the Five Star Movement) clarified that the government did not intend to meet U.S. requests because banning Huawei would leave Italy lagging in setting up 5G (Ministero dello Sviluppo Economico, 2019). The Minister of Economic Development pointed out that "Huawei offers the best solutions at the best prices" and "one cannot fly the flag of the market with one hand and that of protectionism with the other" (quoted in Reuters, 2019a). On the other hand, other political parties maintained a pro-Atlanticism stance. The Copasir<sup>5</sup> conducted a long series of hearings with experts and telecoms groups (Telecom, Wind, Vodafone Italia, and Fastweb) to understand their preferences regarding 5G regulation. In the final report of its investigation, the Copasir suggested banning Chinese companies from the "installation, configuration, and maintenance of 5G" because of national security concerns (Copasir, 2019).

In response to 5G concerns, the Italian government has moved in two directions: first, it delegated this strategic decision to the industry. The Italian Prime Minister released in September 2019 the so-called "National Cyber Security Perimeter", which aimed to expand the list of public and private entities considered as critical for state's cybersecurity (Camera, 2019b). The decree has been elaborated through a very close relationship between the Security and Intelligence Department (DIS) and the industry.<sup>6</sup> The Decree, though, made no explicit reference to Huawei's ban from the 5G network and it substantially delegated the political decision on whether to ban Huawei from 5G to telecoms groups. Delegation to industry was also probably driven by the fact that the state still carries a certain degree of influence over large telecoms groups, especially on Telecom. It does not seem a coincidence then that Telecom announced in 2019 the appointment of Alessandro Pansa, former head of the DIS, as president of the subsidiary TI Sparkle, and as Telecom's advisor for 5G (Telecom, 2019). Formally delegating this strategic decision to telecoms group was an elegant solution to not

<sup>&</sup>lt;sup>5</sup> The *Comitato parlamentare per la sicurezza della Repubblica* (COPASIR) is the parliamentary institution which exercises political control on the intelligence.

<sup>&</sup>lt;sup>6</sup> Enrico Savio, former DIS vice-director and now at Leonardo, has emphasized the existence of "osmosis" between the DIS and the industry. See <a href="http://documenti.camera.it/leg18/resoconti/commissioni/stenografici/pdf/09/indag/c09\_telecomunicazioni/2019/06/12/leg.18.stencomm.data20190612.U1.com09.indag.c09\_telecomunicazioni.0014.pdf">http://documenti.camera.it/leg18/resoconti/commissioni/stenografici/pdf/09/indag/c09\_telecomunicazioni/2019/06/12/leg.18.stencomm.data20190612.U1.com09.indag.c09\_telecomunicazioni.0014.pdf</a>, p.18

compromise relations with China but it was considered solid due to the proximity of Italian telecoms groups to the government (Ghiretti, 2020, p. 4). Telecom has declared that it is not working with Huawei in the core aspects of 5G, but it does not exclude the possibility to collaborate with Chinese companies in the future or in other areas. The Italian decision to not formally exclude the Chinese company was welcomed by Huawei's management, which highlighted that Italy, unlike France and the U.K., is "dealing with cybersecurity in a professional manner" (quoted in Mackenzie & Pollina, 2020).

Second, the government extended the golden power provision to 5G technology. This allows the executive to intervene on a case-by-case basis. At the time of writing (October 2021), the Italian government is repeatedly blocking possible agreements between Fastweb and Huawei in 5G technology (Bechis & Lanzavecchia, 2021). The Italian government's most decisive intervention in 5G also temporally coincided with a significant shift in the Italian political system. The coalition government led by Giuseppe Conte was replaced in February 2021 by a technocratic government supported by a large political majority and led by Mario Draghi.

The case of Italy confirms the research hypotheses (see table 7). Rome preferred to delegate the political decision on whether to ban Huawei to telecoms groups themselves. Consensual delegation to the industry has been strategically used to bypass different political preferences. The close and informal relations between the state and the industries give also the former certain leverage over industry decisions. However, the analysis shows a greater use of golden power on 5G with the advent of the Draghi government.

Table 7: Italy's reaction to the politicization of the 5G dossier

Quiet Politics (2010-2016)	Close state-industry relations. Huawei's ties
	with telecoms groups
Politicization (2017-2018)	US pressure. Political rift in the government
	coalition
Noisy Politics (2019-2021)	Delegation to industry through informal
	interaction
	Golden Power

### 3.4. The Netherlands

In the Dutch case - parliament-dominated country and private governance ecosystem - I expect delegation to industry and formal contracting between the government and the industry.

Scholarly studies have shown that even though the Dutch economy has been characterized by a complex compromise between market liberalization and non-market coordination, the telecoms market has been among the most liberalized (Touwen, 2014, p. 280). The Telecommunications Facilities Bill -introduced by the government in 1987 - corporatized the state-owned PTT (Post Telephone and Telegraph) into a holding company, KPN (Koninklijke PTT Nederland NV), which was then fully privatized in the mid-90s.

The 5G dossier became a politically salient issue between 2017 and 2019. In November 2018, a group of Dutch MPs brought up that the police, emergency services and fireworks should not use any equipment from Huawei and the Dutch government would have to renegotiate the contract signed in 2015 with the Chinese company for telecommunication and surveillance equipment (NL Times, 2018). A year earlier, the AVID (General Intelligence and Security Service) reported about Chinese interference in critical national infrastructures. Yet, security concerns over Chinese suppliers did not stop Huawei's penetration in the Dutch market. In 2018 the Prime Minister Mark Rutte awarded Huawei for the company's contribution to Sino-Dutch cooperation and for being one of the biggest Chinese investors in the Netherlands. The Chinese giant built two important R&D and logistics centers in Eindhoven and Amsterdam and collaborated with KPN on important projects such as industrial 5G applications in the port of Rotterdam.

In April 2019, the AVID warned that the country must not become dependent on equipment from countries that have an "offensive cyber-strategy" and identified China as the largest threat for espionage. As clearly emphasized by AVID general director Dick Schoof, "when it comes to our vital infrastructure or 5G, you do not want to buy hardware and software from countries that conduct an offensive cyber program aimed at Dutch national security" (quoted in Silva, 2019). A few months later, former U.S. Secretary of State Mike Pompeo, after a meeting with Dutch Foreign Minister in The Hague, declared that "our ask is that our allies and our partners and our friends don't do anything that would endanger our shared security interests or restrict our ability to share sensitive information" (quoted in Brunnstrom & Meijer, 2019). Similarly, U.S. Ambassador Pete Hoekstra said the Dutch government should ban Huawei outright from supplying 5G equipment if it wants to prevent Chinese espionage (Deutsch, 2019).

The Dutch reaction to the politicization of the 5G dossier was very cautious. In early 2019, Rutte declared that his government was still exploring options for 5G and had not yet formed an opinion on the possible role of Chinese companies (Reuters, 2019b). The government was also split on the matter, as the Minister of Justice sought a tougher decision against Huawei, while the Minister for Economic Affairs aimed for a softer approach that considered the broader country's trade posture visà-vis the Chinese market (Dutch News, 2019). Given these internal divisions, the government announced the establishment of a task force to weigh potential security risks on 5G networks. The task force was composed by an inter-departmental group, led by the National Coordinator for Counterterrorism and Security. The task force also involved the three largest country's telecoms groups, KPN, T-Mobile and Vodafone Ziggo. In summer 2019, the Minister of Justice Ferd Grapperhaus declared that, according to the task force, there was a "sufficient answer to the threat" of state-backed espionage in 5G networks (Reuters, 2019b). The Minister of Justice added that the Dutch government would take a "country-neutral" approach on 5G and that the negative opinion received from Dutch intelligence services AIVD was only one component of the broader taskforce's risk analysis. The task force basically left the decisions on whether to ban Huawei to telecoms groups (Reuters, 2019c).

A few months earlier, KPN had already decided to exclude Huawei from the core of its 5G networks but to include the Chinese company for the supply of antennas. KPN's choice was based, according to the company's management, on purely commercial reasons. As stated by KPN's spokesman Stijun Wesselink "Huawei, in our opinion, is world-leading on radio antenna technology". Mr Wesselink declared that they were aware of the possible cybersecurity problems, but that Huawei's choice was based on a "lengthy, careful process" (quoted in Nakashima, 2019). The Dutch State Secretary for Economic Affairs and Climate, Mona Keijzer, assured that KPN's choice to modernize its mobile network using some Huawei equipment was in line with the latest government security recommendations. In July 2020, KPN's CEO Joost Farwerck confirmed the day-to-day interaction with the government on the 5G dossier and that they "do not expect the Dutch government to ban the use of Huawei equipment" (quoted in Telecompaper, 2020).

The government's decision to delegate the decision to industry provoked some parliamentary protests. In October 2019, opposition groups supported a motion that would have banned Huawei from 5G, but the governing coalition voted that down, finding it unwise to single out one company or one

country (Reuters, 2019c). In February 2020, Dutch MPs called for more government's transparency on 5G regulation, and the role Huawei will play in it. The government replied that there were no criticalities in its recommendations.

The Dutch case partially confirms the hypothesis (see table 8). On the one hand, as expected, the coalition government decided to establish a technical task force to bypass political divisions and essentially delegated the 5G dossier to the industry. Yet, and contrary to the research hypothesis, there was also a strategic interaction between the government and KPN.

Table 8: Dutch reaction to the politicization of the 5G dossier

Quiet Politics (2010-2016)	Liberalized market. Huawei's investments in
	the market
Politicization (2017-2018)	US and Dutch intelligence pressure
Noisy Politics (2019-2021)	Delegation to industry through creation of a
	technical task force and interaction between the
	government and KPN

# 4. Discussion of the Research Findings

The study's findings yield overall favorable answers to the research hypotheses. The proposed theoretical framework that emphasizes varieties of political systems and political economies works better than the prevailing argument that links political salience to executive-driven and centralized policymaking.

The distinction between executive-dominated and parliament-dominated countries helps to understand cross-national policymaking variation. In France and in the U.K., the government has indeed led policymaking and the telecoms groups have lost grip on policymaking. Yet, as specified in the case selection, the analysis has also shown a clear variation in executive dominance between the French semi-presidential system and the British parliamentary system. In the former, I have observed a relatively higher degree of executive dominance; in the latter, the government's action has been constrained by parliamentary pressure and intra-party fractures. In Italy and in the Netherlands, the governments have delegated the key decision on 5G to the industry. Diffuse power-sharing, fragmented coalition-building and different political preferences within coalition governments led industrial groups to wield more influence on policymaking. In the Italian case, however, I have

observed greater executive intervention after the appointment of a technocratic government with broad political support. This could further strengthen the hypothesis that the political system exerts a fundamental influence to explain policymaking variations.

The empirical analysis partially confirmed the hypothesis that a country's political economy acts an intervening variable, substantially shaping the set of government and corporate choices to deal with strategic decisions. In France, the government initially rely on informal cooperation with its industries but then centralized policymaking and directly intervened to regulate the 5G market. The Italian coalition government has delegated to industry trying to capitalize its leverage and the presence of informal interactions with former state-owned groups as Telecom. However, especially after the advent of Draghi's government, Italy has made extensive use of the golden power, which allows the government's direct intervention in strategic market areas. In the U.K., confirming my hypothesis, the government directly intervened through formal legal tools. The Dutch case challenges my hypotheses, as delegation to industry has been channeled through strategic relations between the government and telecoms groups. Contrary to what initially assumed, the Dutch case seems to be closer to the public rather than to the private governance spectrum.

The empirical analysis highlights the lack of a homogenous nexus between political salience and executive-driven centralization. The analysis also shows that market size was arguably not a decisive variable to explain policymaking variation, as the four countries (whether large like France and the UK or relatively smaller like Italy and the Netherlands) were vulnerable to Huawei's leadership in 5G and constrained to strike complex balances between market and security-driven competing priorities. In addition, the analysis shows that political ideologies hardly play a role in explaining the varieties of policymaking processes across Europe, since governments with different political colors were similarly struggling to square the circle between the above-mentioned competitive priorities.

#### **Conclusions**

The distinction between executive-dominated and parliament-dominated countries helps to understand which actor (the government or the industry) wields greater influence on policymaking in moments of "noisy politics". Moreover, political economy helps to identify the set of policy choices available to governments and industry to deal with strategic decisions. The empirical evidence yields generally favorable results to the research hypotheses. Yet, it also prompts a reflection on possible ways to refine the proposed theoretical framework. Two points are worthy to be mentioned.

First, future research needs to reflect on the clear overlap between political systems configurations and variation in political economies. The article does not explore within-case variation (for instance when public governance ecosystems transition towards private governance ecosystem and vice versa), or mutual influence between the two (see Morgan & Ibsen, 2021). We would probably need longitudinal case studies that to go beyond the specific case of Huawei and 5G. It is indeed conceivable that decisions taken in moments of noisy politics - mediated by the country's political system - could decisively influence government-industry interactions and political economies in the medium-long term. British government formal intervention could progressively lead towards future greater political interference in the telecoms market. Similarly, the restrictive legislative initiatives carried out in France could curb informal interactions between state and firms in the telecoms sector and impact on the broader political economy of sensitive industries. Future studies could also investigate how different firms partnered with Huawei and other Chinese firms (through joint ventures, strategic agreements, mergers). This factor, although arguably not decisive to gauge varieties of European responses towards 5G, could help explain specific industries' reactions to government initiatives.

Second, this article has left out international factors. To be sure, varieties of political systems and political economies cannot account for every instance of government and industry behavior in complex strategic decisions. In the case of Huawei's penetration on Europe's 5G networks, it is necessary to consider both U.S. political pressure and EU-China relationships. Specifically, the four countries under investigation are tightly integrated with the U.S. intelligence and security system. Yet, they recognize Huawei as the most competitive supplier in 5G and they worry about possible retaliation by Beijing in other economic sectors. In this regard, the article shows that policymaking processes have a fundamental influence on policy outcomes. In cases where the coalition governments have delegated strategic decisions to the industry (in the Netherlands and until 2021 in Italy), market considerations have generally prevailed over security ones. In executive-dominated countries there was instead a more rapid (France) or more conflictual (U.K.) transition towards a preponderance of security considerations vis à vis market ones. Linking domestic government-industry interactions with foreign policy postures and international alliances is a key endeavor to grasp the complex mix of economic, technological and security considerations that characterizes today's international politics.

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