

Framing the Regulatory State: Media Contestation Between Legitimacy and Resistance in Indonesian Children's Social Media Governance

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ABSTRACT

This study examines how three leading Indonesian online news outlets Kompas.com, Detik.com, and Tempo.co frame Government Regulation No. 17/2025 (PP TUNAS), Indonesias most comprehensive legislative instrument affecting approximately 70 million users under 16 years of age. the study identifies three distinct framing configurations. Kompas.com employs a normative-cognitive legitimacy frame, constructing PP TUNAS as empirically justified and morally appropriate. Detik.com applies a pragmatic-informative legitimacy frame, normalizing the regulation through procedural coverage without explicit resistance narratives. Tempo.co develops a critical-investigative resistance frame during the policy formation phase, shifting toward a balanced critical-constructive frame during implementation a pattern theorized as legitimacy migration from value-level to performance-level contestation. Framing divergence is shaped by ownership structures, editorial traditions, and political-economic positioning, extending framing theory and critical media studies in the Global South context.

INTRODUCTION

The internet has reached Indonesian children on a scale that experts call a digital emergency. Data from Statistics Indonesia (BPS, 2024) shows that 28.65% of Indonesia's population are children (± 79.8 million individuals), while the Association of Indonesian Internet Service Providers (APJII, 2024) notes that 48% of active internet users are under 18 years old. Furthermore, 23.19% of children under 13 are already active internet users, with an average daily usage duration reaching eight hours far exceeding the global average of five hours (Komdigi, 2025). These figures urge Indonesia to strengthen its digital child protection policies.

Digital exposure on this scale poses tangible risks to children. The Indonesian Child Protection Commission (KPAI, 2025) recorded a rise in cyberbullying cases from 2,000 cases (2019) to over 4,000 cases (2023), while cases of online child sexual exploitation increased by 66% in the same period. The National Center for Missing & Exploited Children (NCMEC, 2024) ranked Indonesia fourth globally and second in ASEAN in digital child pornography cases. A total of 110 children were recorded as being ensnared by terrorism networks through social media and online games in 2025 (KPAI, 2025), while approximately 5 million children accessed adult content and online gambling in 2026 (KPAI, May 4, 2026). These figures fortify the empirical foundation for state regulation.

President Prabowo Subianto signed Government Regulation Number 17 of 2025 concerning the Governance of Electronic System Organization in Child Protection (PP TUNAS) on March 28, 2025. Effective starting March 28, 2026, PP TUNAS mandates eight high-risk platforms TikTok, YouTube, Facebook, Instagram, Threads, X, Bigo Live, and Roblox to conduct age verification and restrict access for approximately 70 million users under 16 years of age. Indonesia joins a global wave of regulation: Australia (Online Safety Amendment Act 2024) bans children under 16 from accessing certain platforms, the UK (Online Safety Act 2023) imposes protection duties on platforms, and the European Union (Digital Services Act 2022) implements mandatory risk assessments for platforms serving young users (Flew, 2021; Gorwa, 2019).

PP TUNAS emerged amidst contestation. Digital civil society particularly the Southeast Asia Freedom of Expression Network (SAFEnet) documented three structural risks: the absence of data protection standards, inadequately regulated parental consent mechanisms, and the potential for invasive surveillance infrastructure (SAFEnet, 2025). Academics from the Center for Digital Society at Universitas Gadjah Mada (CfDS UGM) questioned the effectiveness of age verification without sufficient digital literacy, while the Indonesian Pediatric Society (IDAI) asserted that PP TUNAS is a preliminary step, not a silver bullet. It is within this tension that the mass media assumes a central role in shaping the public's understanding of the regulation.

News media construct the meaning of policies rather than merely reflecting them (Entman, 1993; Tuchman, 1978). Referring to Bourdieu's (1991) symbolic power, the media constructs reality through the selection of frames influenced by political-economic interests, editorial traditions, and ownership

structures. In Indonesias oligarchically concentrated media landscape where 13 conglomerates control almost all national media (Lim, 2012; Tapsell, 2017) framing divergence across outlets cannot be understood merely as editorial differences. Instead, it must be read as a product of each media outlets structural position in relation to the state and capital.

This study responds to four analytical gaps in the literature. First, there has been no systematic comparative framing study of PP TUNAS as a specific research object. Second, existing framing literature in Indonesia tends to stop at the descriptive level of media A supports, media B criticizes without integrating political-economic determinants as explanatory variables (Adiprasetyo & Larasati, 2021). Third, scholarship on the Indonesian media oligarchy (Lim, 2012; Tapsell, 2017) has not been systematically integrated with framing methodologies. Fourth, framing theory needs to be expanded with a temporal dimension to capture the dynamics of frame shifts across a policy's life cycle.

The formulated research questions are: (1) How do Kompas.com, Detik.com, and Tempo.co apply Entman's four framing elements in their coverage of PP TUNAS? (2) How can the framing divergence be explained through the political-economic position of each media outlet? (3) How do media frames reproduce or contest the legitimacy of state regulation, and what mechanisms drive frame shifts across policy phases?

THEORETICAL REVIEW

Framing Theory: Robert M. Entman's Model

Framing theory rests on the constructivist premise that the reality presented by the media is the result of discursive construction through processes of selection, emphasis, and presentation (Berger & Luckmann, 1966; Goffman, 1974). Entman (1993, p. 52) defines framing as the process of selecting some aspects of a perceived reality and making them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation. Framing, therefore, is a political-discursive activity operating through selection and saliency.

This study applies Entman's four-element model as an operational framework. First, define problems: how the media frames an issue as a problem requiring public attention, and what values are used as benchmarks. Second, diagnose causes: who or what is attributed as the cause of the problem, which determines where responsibility is directed. Third, make moral judgement: the normative evaluation of the actors and actions involved in the issue. Fourth, treatment recommendation: what solutions are proposed or justified to solve the problem.

Scheufele (1999) identifies framing as a dependent variable (factors shaping the frame, including structural determinants) and an independent variable (the effect of the frame on audience cognition), a dichotomy that directs this study to focus on the former dimension. De Vreese (2005) distinguishes generic frames (conflict, human interest, economic consequences, morality, responsibility) that cross-cut issues from issue-specific frames emerging from the

semantic field of a particular controversy. Van Gorp (2007) shows that journalistic frames are not created from scratch but activate and reproduce cultural packages available in the social context an insight relevant to understanding why the child protection frame activates strong cultural resonance in Indonesia.

Media Political Economy and the Indonesian Media Oligarchy

Murdock and Golding (2005) demonstrate that ownership and market conditions mediate media content production. Framing, from this perspective, is shaped by ownership relations, market structures, advertiser interests, and the medias relationship with the state. Ownership concentration directs the frames produced and disseminated.

In the Indonesian context, Lim (2012) documented that 13 conglomerates control almost all major national media, the majority with active political affiliations. Tapsell (2017) shows that post-Suharto liberalization did not result in genuine media pluralism but rather oligarchic consolidation where media owners systematically align editorial content with their political-economic interests. The three media analyzed in this study exist within this structural context: Kompas.com under the Kompas Gramedia Group (relatively independent with a tradition of quality journalism); Detik.com under Chairul Tanjung CT Corp (a conglomerate with extensive business interests including the digital ecosystem); and Tempo.co under PT Tempo Inti Media (with a documented tradition of investigative and editorial independence).

Steele (2011) shows that editorial culture and institutional history substantively shape journalistic practices mechanisms that work alongside ownership determinants in directing frame selection. Grafström and Windell (2012) demonstrate that institutional isomorphism can drive frame convergence despite platform diversity, a dynamic that must be accounted for in comparative analysis.

Public Policy Legitimacy Theory

Suchman (1995) defines legitimacy as a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions. Suchman identifies three types of legitimacy: pragmatic (based on the self-interested calculations of the most immediate audiences), moral (based on normative evaluations of the activity), and cognitive (based on comprehensibility and the taken-for-grantedness of an entity).

Media framing shapes public perceptions of a policy's legitimacy; actors seeking to maintain or challenge that legitimacy, in turn, attempt to articulate specific frames through the media. Vaara, Tienari, and Laurila (2006) identify five discursive legitimation strategies used by the media: authorization, rationalization, moral evaluation, normalization, and narrativization each corresponding to Entmans framing mechanisms.

The concept of legitimacy migration formulated in this study describes the shift of dominant frames from value-level contestation (is the policy principally valid?) to performance-level contestation (is the policy working effectively?) as

implementation evidence accumulates. This concept extends Suchmans typology through a temporal dimension based on the policy cycle.

Habermass Public Sphere Theory and Castellss Power Networks

Habermas (1989) conceptualized the public sphere as an arena where citizens engage in rational discourse on public issues, free from the domination of the state and capital. In the context of digital media, the public sphere shifts to what Habermas calls technologically mediated deliberative democracy where the quality of deliberation depends on access structure, source pluralism, and the degree of media independence from political-economic power.

Castells (2009) in *Communication Power* demonstrates that power in the network era operates through the ability to construct and program communication networks. Mass media functions as critical nodes within the communicative power network, entities that control which frames circulate in the public sphere. In the context of PP TUNAS, media framing is an act of power construction that determines what meanings are available to the public.

Digital Governance and Child Protection in the Digital Space

Digital governance refers to a set of institutional, regulatory, and practical mechanisms governing the operation of digital spaces (Flew, 2021; Gorwa, 2019). Digital governance oscillates between two paradigms: platform self-regulation, which dominated until the early 2020s, and state regulatory capitalism, which has strengthened since 2023 (Flew, 2021). PP TUNAS marks Indonesias acceleration into the second paradigm.

In the dimension of child protection, Livingstone and Third (2017) identify a fundamental tension between the protection paradigm and the participation paradigm in childrens digital policy a dichotomy they term digital paternalism. Mendez et al. (2024), in a study in *Frontiers in Developmental Psychology*, documented that screen media use raises serious concerns as children risk exposure to inappropriate content, cyberbullying, and interactions with strangers. Santos et al. (2023), through a systematic review of 50 articles, found a correlation between screen time and declining mental well-being in adolescents. This evidence reinforces the empirical basis for regulatory intervention while also serving as material that is framed differently by each media outlet.

ECPAT, INTERPOL, and UNICEF (2022), in a special report on Indonesia, classified Online Child Sexual Exploitation and Abuse (OCSEA) as a transnational crime relying on digital technology and recommended strengthening national child protection systems. Syavica, Sahlepi, and Rahmayanti (2026) analyzed that Indonesias legal framework (Law No. 17/2016 and Law No. 12/2022) provides a foundation for perpetrator accountability, but its implementation requires effective detection mechanisms in the digital space.

METHODOLOGY

Paradigm and Approach

This study employs a critical-interpretative paradigm rooted in social constructivism (Berger & Luckmann, 1966; Lincoln & Guba, 1985). The critical

paradigm allows the researcher not only to describe framing but also to identify the power relations and interests driving the dominance of specific frames (Murdock & Golding, 2005). The approach utilized is qualitative framing analysis based on Entmans (1993) model a method epistemologically consistent with the assumption that media texts are socially constructed artifacts containing layered meanings that can be systematically analyzed.

Research Corpus and Sampling Technique

The research corpus consists of 37 news articles from three online media outlets Kompas.com (12 articles), Detik.com (13 articles), and Tempo.co (12 articles) selected through purposive sampling (Patton, 2002). This technique ensures the representation of relevant content rather than the statistical representation of a population. The search strategy utilized a combination of keywords: PP TUNAS, PP 17/2025, childrens social media restriction, digital child protection, and digital platform governance (in Indonesian).

Article inclusion criteria: (a) primary or significant focus on PP TUNAS and its implementation; (b) published between March 2025 – March 2026; (c) a minimum of 400 words (substantive journalistic content); (d) categorized as news, investigative reports, or fact-based opinion pieces. Exclusion criteria: unedited press releases, duplicate coverage with identical content, and opinion pieces lacking a data or argument base suitable for analysis.

The selection of these three media outlets was based on three considerations: (1) audience relevance Kompas.com, Detik.com, and Tempo.co consistently rank among the top five online media by traffic in Indonesia (SimilarWeb, 2025); (2) ownership differentiation they represent distinct ownership positions within the map of Indonesias media oligarchy; and (3) editorial differentiation they are known to possess distinct editorial characters, enabling meaningful comparative analysis.

Analytical Procedure

The analysis proceeded in four stages corresponding to four longitudinal policy phases. Phase 1 Enactment (March 2025): framing analysis of the signing and announcement coverage of PP TUNAS. Phase 2 Socialization and Critical Contestation (April–November 2025): coverage of stakeholder responses, public debate, and socialization processes. Phase 3 Pre- and Day of Implementation (December 2025–March 2026): reporting on platform preparation and the regulations effective date. Phase 4 Enforcement and Initial Evaluation (March–March 2026): coverage of actual implementation, platform compliance, and initial public responses.

The analytical procedure followed four steps: first, data reduction through open coding of each article to identify meaning units relevant to Entmans four framing elements; second, frame categorization through axial coding to group meaning units into more abstract framing patterns; third, discourse interpretation connecting framing patterns with the context of ownership, editorial history, and the medias political-economic position; fourth, cross-media comparison to identify framing divergences and convergences alongside their explanations.

Validity and Reliability

The study's credibility was reinforced through three mechanisms. First, source triangulation: the framing analysis was verified with empirical data from primary sources (PP TUNAS, Minister of Communication and Digital Regulation No. 9/2026, KPAI reports, BPS, and APJII data). Second, negative case analysis: the researcher actively sought articles that did not fit the identified framing patterns to test the robustness of the categorization. Third, researcher reflexivity: the researcher's position as a civil servant at DP3AK East Java Province is explicitly acknowledged, with a conscious effort to separate academic analysis from institutional perspectives.

RESULTS

Empirical Context: Implementation of PP TUNAS

Before analyzing the framing, it is necessary to establish the empirical facts serving as a common reference for all three media outlets. PP TUNAS became effective on March 28, 2026, mandating eight high-risk platforms TikTok, YouTube, Facebook, Instagram, Threads, X, Bigo Live, and Roblox to conduct age verification and restrict access for users under 16 (see Table 2). By April 10, 2026, TikTok had deactivated 780,000 children's accounts, increasing to 1.7 million by April 29, 2026. Meta (Facebook, Instagram, Threads) achieved full compliance. Google (YouTube) received a written reprimand from the Ministry of Communication and Digital (Komdigi) for ongoing non-compliance.

Table 2. Social Media Access Classification Based on Age PP No. 17/2025 (PP TUNAS)

No.	Age Group	Platform Category	Access Requirements	Legal Basis
1	≤13 years	Low risk	Accessible with parent/guardian consent	PP No. 17/2025 Article 13(1)
2	13–15 years	Low risk	Access still requires parent/guardian permission	PP No. 17/2025 Article 13(2)
3	16–18 years	High risk	Access with parental consent; account creation requires permission	PP No. 17/2025; Permenkomdigi No. 9/2026
4	≥18 years	All categories	Full access without age restriction	PP No. 17/2025 Article 13(4)

These empirical facts became the identical material for the three media outlets, yet they were constructed differently through the framing process. That identical empirical material is constructed differently by the three media affirms the position of Entman (1993) and Van Gorp (2007): framing is the production of reality, not its reflection.

Kompas.com: Normative-Cognitive Legitimacy Frame

Across the 12 analyzed articles, Kompas.com consistently applied a normative-cognitive legitimacy frame constructing PP TUNAS as an instrument

that morally ought to exist (cognitive dimension: taken-for-granted) and aligns with universally applicable values of child protection (normative dimension).

On the problem definition element, Kompas.com relied on two critical data points: the NCMEC (2024) report ranking Indonesia fourth globally in digital child pornography cases, and KPAI data indicating Indonesia had the highest child suicide rate in ASEAN from 2023–2025. These two data points were placed in news leads and headlines, not concluding paragraphs an editorial decision that framed the child safety emergency as an uncontested problem definition. When the problem is defined as a child safety emergency, state regulation becomes a logically irrefutable solution.

On the causal attribution element, Kompas.coms dominant sources were the tri-sector consensus: Komdigi (state perspective), IDAI/Indonesian Pediatric Society (medical perspective), and Kemendukbangga (social perspective). This authoritative source triangulation constructed PP TUNAS as a consensus-based policy supported by the three most relevant pillars of authority. SAFEnet the most vocal critical actor was included in only one article as a technical note positioned after officials quotes, an effective gate-keeping technique that minimized the impact of counter-narrative voices.

The Minister of Communication and Digital, Meutya Hafid, was quoted on two key propositions: Indonesia is a pioneer among non-Western countries in digital child protection and There is no compromise regarding compliance. This framing positioned PP TUNAS within a narrative of internationalization and digital nationalism Indonesia as a nation daring to lead among other Global South countries. The deactivation of 1.7 million TikTok accounts was constructed as a milestone of success, confirming the frames initial expectation that the regulation would be effective.

Detik.com: Pragmatic-Informative Legitimacy Frame

The theoretically most surprising finding was the correction of the initial assumption that Detik.com as a high-traffic media outlet owned by CT Corp would display populist amplification of the PP TUNAS controversy to boost reader engagement. Instead, the analysis of 13 articles showed a consistent and uniform pattern: a pragmatic-informative legitimacy frame that systematically positioned PP TUNAS as a valid, enforceable policy whose mechanisms needed to be understood without a single explicit narrative of resistance.

The problem definition in Detik.coms coverage was procedural-administrative: PP TUNAS was presented as a regulatory fact that must be understood, not as a policy to be critically evaluated. Typical headlines List of Social Media Restricted by Komdigi, In 2 Days, 70 Million Indonesian Users Will Face Social Media Restrictions, Starting Tomorrow! Komdigi Restricts Childrens Social Media Access functioned as utilitarian information for readers who needed to grasp the changes affecting their digital lives. This frame positioned readers as subjects of policy who needed to adapt, rather than as citizens who could evaluate or contest the policy.

The total absence of quotes from SAFEnet or critical academics across all 13 articles is the most significant indication of structural gate-keeping. In Detik.coms framing, there are no two sides to the PP TUNAS debate there is only

one side: the implementation side. Moral evaluation was conducted implicitly through internationalization: Indonesia was termed the first non-Western country to implement age-based restrictions a claim functioning as global validation for a national policy. In Articles 12–13, the framing shifted to a consequence narrative: sanctions on Google served as a stern warning, while appreciation for Meta served as an example of compliance a reward-punishment frame reinforcing the pragmatic legitimacy of PP TUNAS.

CT Corps ownership, with significant business diversification in the digital ecosystem (Trans Media, Trans TV, CT Corp Finance), created structural incentives to avoid frames that could stimulate public controversy over digital regulation, which could potentially induce business uncertainty. Detik.coms high-traffic business model (targeting a broad mass audience, not a niche-critical readership) logically produced an editorial preference for informative and easily digestible content, rather than investigative content requiring context and nuance (Murdock & Golding, 2005; Tapsell, 2017).

Tempo.co: Critical-Investigative Resistance → Balanced Critical-Constructive

Tempo.co exhibited the most dynamic framing pattern: a shift from critical-investigative resistance (Phases 1–2) to a balanced critical-constructive frame (Phases 3–4). This shift was a methodological response to the accumulation of implementation evidence, not an ideological change this is the pattern this study theorizes as legitimacy migration.

In Phases 1–2 (March–November 2025), Tempo.co performed a counterpublic function (Fraser, 1990) by providing an alternative deliberation space regarding PP TUNAS. The investigation Irregularities in Childrens Internet Restriction within PP TUNAS uncovered a formation process lasting only two months (January–March 2025), a lack of meaningful public consultation, and the adoption of Australian regulations without comparative studies of differences in legal context, culture, and technical capacity. SAFEnet documented three structural risks: the absence of data protection standards, inadequately operationalized parental consent mechanisms, and the potential for invasive surveillance infrastructure. The framing in this phase located the problem at the level of democratic process: it was not a question of whether protecting children was right (which was not debated), but rather whether the policy-making process was democratic and accountable.

A crucial shift occurred in Phases 3–4 (December 2025–March 2026): Tempo.co began shifting focus from process contestation to performance verification. The Minister of Primary and Secondary Education, Muti, was quoted expressing concern that children potentially fake their age an officials acknowledgment of the regulations technical limitations constructed as evidence for necessary improvements, not a total failure. KPAI proposed five platform compliance conditions as verified benchmarks. IDAI asserted that PP TUNAS is a preliminary step, not a single solution a framing acknowledging the regulations value while maintaining a critical function. The report How Strict Are the Social Media Access Restrictions for Children on the first day of implementation served

as empirical verification, positioning Tempo.co as the judge of regulatory performance, rather than merely an anti-regulation advocate.

This legitimacy migration pattern can be read as a shrewd journalistic strategy: Tempo.co maintained its critical credibility by moving the battleground from is this regulation principally valid to is this regulation empirically working a shift much harder for the government to refute, as regulatory performance can be independently verified.

Table 3. Cross-Media Entman Framing Comparison Matrix (n=37, March 2025 – March 2026)

Framing Element	Kompas.com	Detik.com	Tempo.co
Define Problems	Child safety crisis; Indonesias digital emergency NCMEC 2024 data (child porn) + KPAI (highest child suicide rate in ASEAN 2023–2025). Institutional response as a moral imperative.	Procedural/administrative problem; PP TUNAS as a regulatory fact whose mechanisms must be understood. Framing: List of Social Media Restricted and 70 Million Users to be Restricted.	Democratic accountability deficit in regulatory formation: minimal public consultation, two-month process, and adoption of Australian rules without Indonesian context study. Shifts to technical efficacy in Phases 3–4.
Diagnose Causes	Platform failure to regulate harmful content + absence of state protection. Dominant sources: Komdigi, IDAI, Kemendukbangga tri-sector consensus. SAFEnet merely as a technical note.	Komdigi + DPR (Parliament) as authoritative regulatory actors. No sources from critical civil society (SAFEnet, academics) in 13 articles structural gate-keeping.	The state as a rushed regulation producer; platforms as unprepared regulatory subjects. SAFEnet, CfDS UGM, KPAI, IDAI critical actors positioned as balanced sources.
Make Moral Judgement	PP TUNAS = the states moral duty; child welfare supersedes digital interests.	Procedural normalization through internationalization: Indonesia the first non-Western country; Meta	Childrens digital rights + democratic accountability + child

Framing Element	Kompas.com	Detik.com	Tempo.co
	Indonesia as a non-Western pioneer in digital child protection (Meutya Hafid quoted positively).	praised (fully compliant); Google reprimanded (non-compliant). Implicit moral evaluation via compliance-sanctions.	autonomy as a counterweight. Critique of state digital paternalism. Officials as subjects of empirical verification, not authoritative sources.
Treatment Recommendation	Full and uncompromising enforcement; appreciation for 1.7 million TikTok account deactivations as a success milestone. State-platform-family synergy.	Platform compliance as the solution; administrative sanctions as the mechanism. Tutorial framing: compliance guides for users and platforms.	Digital literacy + parental education + evidence-based regulatory reform as structural solutions. Non-invasive age verification mechanisms that do not create surveillance infrastructure.
Frame Type	Normative-Cognitive Legitimacy	Pragmatic-Informative Legitimacy	Critical-Investigative Resistance → Balanced Critical-Constructive (legitimacy migration)
Legitimacy Function	Moral + cognitive legitimacy (Suchman, 1995)	Pragmatic legitimacy through proceduralization	Process delegitimation → migration to performance contestation

Political-Economic Determinants of Framing Divergence

Four mechanisms explain how ownership structures and political-economic positions mediate framing divergence. First, the sourcing mechanism: the selection of news sources is the editorial decision that most directly reflects

framing positioning. Kompas.com: dominance of the government-medical-social tri-sector consensus with SAFEnet as a footnote. Detik.com: zero critical sources across 13 articles. Tempo.co: source pluralism, positioning SAFEnet, CfDS UGM, and critical academics equally with officials. This source differentiation is an editorial strategy reflecting the institutional identity of each media outlet.

Second, the headline and first definition mechanism. Kompas.com used headlines asserting empirical urgency (Indonesia Ranks 4th Globally in Child Pornography). Detik.com used utilitarian-informative headlines (List of 8 Restricted Platforms). Tempo.co used investigative, questioning headlines (Irregularities in Childrens Internet Restriction). This pattern reflects differing business models: Kompas targets educated upper-middle-class readers, Detik pursues mass-market high traffic, and Tempo serves readers willing to pay for investigative journalism.

Third, the temporal framing mechanism: only Tempo.co exhibited a structured frame shift across phases a capacity requiring journalistic resource investment (specialized reporters, investigative teams, longitudinal databases) that can only be sustained by media with business models not solely reliant on advertising traffic. Fourth, the positioning mechanism vis-à-vis the state: Kompas.com, as a media outlet historically maintaining good relations with the government, tends to validate policy through consensus-reinforcing frames. Detik.com, as a commercial outlet whose ownership has business interests in digital regulatory stability, avoids narratives that could stimulate uncertainty. Tempo.co, possessing a tradition of resisting power since the Suharto era, maintains a watchdog function using strategies that evolve over time.

DISCUSSION

PP TUNAS: Child Protection or Digital Control?

The fundamental question transcending the framing analysis is: does PP TUNAS align more closely substantively with a child protection regime or a digital control regime? The answer depends on the analytical framework applied and the regulatory elements examined.

From a child protection perspective, PP TUNASs empirical foundation is solid. Data from KPAI, NCMEC, and ECPAT-UNICEF consistently demonstrate that Indonesian children face genuine risks in the digital space: sexual exploitation, grooming, cyberbullying, exposure to harmful content, and mental health disorders. Age-based regulation is an internationally recognized preliminary response Australia, the UK, and the EU have implemented similar mechanisms. Mendez et al. (2024) and Santos et al. (2023) provide robust empirical support that interventions regarding childrens social media access have valid mental health justifications.

However, from a critical perspective referring to surveillance society theory (Lyon, 2001), any mandatory age verification system inherently creates a digital identification infrastructure that exceeds its regulatory purpose. This infrastructure can be repurposed for broader surveillance goals a relevant risk for developing democracies with immature oversight capacities (Castells, 2009; Flew, 2021). SAFEnet (2025) identified that PP TUNAS does not establish explicit data minimization standards, does not regulate post-verification data deletion

mechanisms, and lacks accountability rules for third parties conducting age verification.

From the childrens digital rights perspective developed by Livingstone and Third (2017), the tension between protection from harm and participation rights remains unresolved. The UN Convention on the Rights of the Child (1989) recognizes childrens rights to expression, information, and participation rights that can be impacted by overly broad digital access restrictions. PP TUNAS does not provide mechanisms for 16-17-year-olds to access positive content that gets blocked alongside harmful content.

Production of State Legitimacy through Media

This comparative framing analysis reveals how two of the three media actively produced state legitimacy for PP TUNAS, albeit through different mechanisms. Kompas.com produced moral and cognitive legitimacy through a frame that constructed PP TUNAS as a consensus of experts, minimized counter-narrative voices, and relegated resistance to an afterthought incomparable to the urgency of the child safety emergency. Detik.com produced pragmatic legitimacy through procedural normalization making compliance a taken-for-granted norm and non-compliance an anomaly needing correction.

Both legitimacy production mechanisms operate through what Habermas (1989) termed the colonization of the public sphere by the system: media that should serve as arenas for critical deliberation instead function as transmitters of state policy. Bourdieu (1991) would interpret this as an expression of symbolic power: the states ability (via aligned media) to establish a problem definition that makes a particular response appear as the only rational one.

This legitimacy production is not merely propaganda it is a complex process where state interests, media business interests, and genuine child protection interests interweave so tightly that separating authentic motivation from institutional interest becomes difficult (Murdock & Golding, 2005). Kompas.com may genuinely believe that PP TUNAS is the right policy and its empirical basis cannot be deemed weak. Yet, this belief systematically corresponds with the institutional and ownership position of a media outlet lacking incentives to investigate the regulations flaws.

Construction of Public Resistance and the Counterpublic Function

Tempo.co performed a function that, in Frasers (1990) theory of deliberative democracy, is called a counterpublic: an arena where members of subordinate groups invent and circulate counter-discourses to formulate oppositional interpretations of their identities, interests, and needs. By providing a platform for SAFEnet, CfDS UGM, and voices questioning the formation process of PP TUNAS, Tempo.co allowed public resistance to gain coherent and verifiable articulation not merely emotional rejection.

However, this studys findings indicate that this counterpublic function has temporal limits and dynamics. Tempo.cos shift from critical resistance to balanced critical-constructive in Phases 3–4 shows that the accumulation of positive implementation evidence (1.7 million account deactivations, Metas

compliance) modified the resistance strategy from principled rejection to performance oversight. This form of resistance is harder for the state to counter because its evaluation criterion empirical efficacy is universally recognized.

In an emerging democracy with a powerful media oligarchy, effective counterpublics do not always manifest as total rejection. Repositioning from a battleground of values to a battleground of performance is a strategy that maintains critical function while adapting to accumulating facts.

CONCLUSIONS AND RECOMMENDATIONS

Based on a comparative analysis of 37 articles, this study concludes that Indonesian online media (Kompas.com, Detik.com, Tempo.co) constitute a contested discursive arena in framing Government Regulation No. 17/2025 (PP TUNAS), where the selection of these frames is systematically dictated by ownership structures and business models. Kompas.com reinforces state consensus through normative-cognitive legitimacy, and Detik.com normalizes the policy procedurally for the sake of its commercial stability, while Tempo.co exercises a *counterpublic* function with a resistance frame that later migrates into a critical-constructive evaluation. These findings prove that media framing not only serves as a tool for reproducing the states discursive power, but legitimacy migration also opens a space for empirical evidence-based performance oversight amidst the oligarchical media landscape of the Global South.

To bridge the tension between the protection and participation paradigms of childrens digital rights, the government, through the Ministry of Communication and Digital, is recommended to draft derivative regulations that establish strict data minimization and anti-surveillance standards. This is extremely crucial to ensure that age verification mechanisms by platforms do not transform into an invasive surveillance infrastructure regarding childrens privacy. Furthermore, the government needs to facilitate the establishment of an independent performance audit mechanism involving civil society and academics to monitor the regulations effectiveness objectively, so that the public does not rely solely on unilateral compliance claims from platform companies.

On the other hand, the mass media industry is encouraged to transcend procedural journalism practices by fully adopting a childrens digital rights perspective and opening deliberative spaces for non-governmental voices. Simultaneously, restrictive regulations such as PP TUNAS should not be positioned as a single solution (*silver bullet*) in resolving the digital emergency. Educational institutions and families must continue to be encouraged to strengthen digital literacy as a structural intervention, making childrens cognitive aptitude a fundamental bastion of protection that cannot be replaced by any technological restrictions.

FURTHER STUDY

The limitations in the scope of this study open strategic opportunities for further research agendas in three main directions. First, a study based on audience reception analysis whether through experimental surveys or Focus Group Discussions is needed to empirically measure how children and parents actually interpret and respond to the frames presented by the media. Second,

discourse mapping needs to expand its media ecology reach by involving regional news portals, platform journalism (podcasts, newsletters), and content creators on social media, who often possess a more intimate discursive proximity to the child and adolescent demographic compared to mainstream media. Third, considering that this research focuses only on the initial phase of the regulation, a longitudinal evaluation study spanning the next two to three years is highly crucial to track the maturity of this governance while simultaneously testing whether the phenomenon of legitimacy migration can continue to persist amidst the emergence of new technological evasion tactics, such as identity spoofing or the rampant use of VPNs by children.

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