



Royalty Payment Mechanism for Songwriters in Indonesia

Henry Surya Wicaksono^{1*}, Krisnadi Nasution²

¹⁻² Universitas 17 Agustus 1945 Surabaya, Indonesia

*Correspondence author: henrysu415@gmail.com

Abstract. The weak mechanism for royalty payments to songwriters in Indonesia, despite Law No. 28 of 2014 on Copyright clearly regulating moral rights and economic rights. In practice, there are still various violations in the form of unauthorized use of songs, low compliance with royalty payments, and suboptimal performance of Collective Management Organizations (CMOs) and National Collective Management Organizations (NCMOs). This study aims to analyze the concept of songwriters' economic rights, the mechanism for managing royalties, and the effectiveness of legal protection in its implementation. The research method uses a normative juridical approach by examining laws and regulations as well as conceptual data related to copyright management. The results show that although regulations have provided a strong legal basis, the implementation of royalty payment mechanisms still faces structural and technical obstacles, including the transparency of CMOs, the legal awareness of users of works, and weak law enforcement against violations. This study emphasizes the importance of improving the mechanisms for collecting and distributing royalties so that the protection of the economic rights of creators can be carried out effectively and fairly.

Keywords: Copyright, Economic Rights, Royalties, LMK, Legal Protection.

1. BACKGROUND

Creative works in the field of music and songs are a manifestation of human thought that not only reflects artistic expression but also has strategic value in the context of national culture and economy (BAGUS LANDUNG EKA SAPUTRA, 2024a). In the dynamic development of the creative industry, particularly the music industry, song creations serve as intellectual assets that not only contribute to the cultural identity of the nation but also have the potential to become a significant source of economic income for their creators. Recognition of this has prompted the Indonesian government to regulate and protect copyright for songwriters as stipulated in Law Number 28 of 2014 concerning Copyright (hereinafter referred to as UUHC).

UUHC clearly mandates exclusive rights for creators, consisting of moral rights and economic rights, which are automatically attached once the creation is realized in tangible form. Moral rights are oriented towards recognition and respect for the personal relationship between the creator and their work, while economic rights give creators the authority to control the use of their work and obtain economic benefits from it, including royalties as a form of financial compensation. Enforcement of these economic rights is very important in maintaining the sustainability of the creative ecosystem, providing incentives for creators in the process of producing new works, as well as providing legal certainty for users of works cipta.

However, the reality on the ground reveals a significant gap between the established regulations and the actual implementation of royalty payment mechanisms in Indonesia. There are various obstacles, ranging from copyright infringement in the form of unauthorized use of works or non-payment of royalties, suboptimal mechanisms for collecting and distributing royalties, to weak supervision and law enforcement against such violations. The phenomenon of illegal use of copyrighted works occurs not only in the commercial sphere, but also in the non-commercial sphere, which has a direct impact on the loss of the creator's economic rights. This condition shows a lack of effectiveness in the implementation of legal protection that is in line with the needs of the increasingly developing and complex music industry.

The role of Collective Management Organizations (CMOs) and the National Collective Management Organization (LMKN) as collective mechanisms in royalty management is regulated to optimize the collection and distribution of royalties in a transparent, fair, and proportional manner (BAGUS LANDUNG EKA SAPUTRA, 2024a). However, in practice, the existence of these institutions has not yet provided an effective solution. There are still issues related to transparency in management, ineffective distribution of royalties to creators, and a lack of strict sanctions for royalty payment violations. The legal implications of this situation are significant losses for songwriters, which essentially constitute a violation of the economic rights of creators as stipulated in the UUHC.

Thus, the problems that arise are not only related to the technical aspects of the royalty management mechanism, but also touch on the effectiveness of legal protection and law enforcement as the main instruments in providing legal certainty for songwriters. There is an urgent need to conduct a systematic and comprehensive normative legal review to examine the provisions of laws and regulations related to the royalty payment mechanism in the Copyright Law, as well as to explore the extent to which substantive legal protection and sanction mechanisms can provide a deterrent effect against violations of the economic rights of creators. This research is important to examine, considering that effective copyright protection is one of the main prerequisites in promoting a healthy and sustainable music industry, thereby providing optimal economic benefits while preserving the nation's culture. Therefore, this study aims to critique and develop a legal understanding of royalty payment mechanisms and the protection of songwriters' economic rights, which in turn can be used as recommendations for more effective and responsive legal policies to the dynamics of the music industry in Indonesia.

2. THEORETICAL REVIEW

Intellectual Property Rights

Intellectual Property Rights (IPR) refers to rights derived from human intellectual creations. These rights are regulated under Law No. 7 of 1994 concerning the ratification of the Agreement Establishing the World Trade Organization (WTO). IPR governs ownership over creations that originate from human intellectual abilities and are closely connected to personal or human rights. According to the World Intellectual Property Organization (WIPO), IPR encompasses human-made creations, including inventions, literary and artistic works, symbols, names, images, and designs used in commercial activities (Jamba, 2015).

The core principle of IPR is that it protects works produced through thought and creativity, which require specialized skills, dedication, effort, and sacrifice. Ownership of intellectual creations, although initially abstract, is considered comparable to ownership of physical property, as both are absolute rights. Once an intangible idea is transformed into a scientific, literary, artistic work, or expressed opinion, it becomes a tangible object (lichamelijke zaak). Its use and reproduction (exploitation) may generate economic value, thus justifying its inclusion under property law.

Issues concerning Intellectual Property Rights continue to evolve alongside advancements in science and technology. The term IPR is the English equivalent of Hak Kekayaan Intelektual (HKI), as stated in Law No. 7 of 1994 regarding the ratification of the WTO agreement. IPR refers to legal regulations that protect creations resulting from human intellectual capability, which relate closely to an individual's personal and fundamental human rights (Handoko & Roisah, 2024).

Property rights here referred to the concept of "ownership" in relation to social and legal institutions, both of which are always associated with "owners" and "something owned." Broadly speaking, the concepts of "ownership" and "property" when linked to "rights" are, from a legal perspective, known as rights relating to ownership and rights relating to property. Basically, property rights also include ownership rights because ownership is always related to a particular object, whether material or immaterial. Thus, IPR are an understanding of the rights to wealth arising from intellectual abilities, which are related to a person's personal rights, namely human rights.

Intellectual property rights are rights that originate from the creative activities of human intellectual abilities, which are expressed to the general public in various forms, are beneficial and useful in supporting human life, and also have economic value. The tangible forms of intellectual work can be in the fields of technology, science, or art and literature. As a property

right arising from human work, ideas, and creations, it can also be referred to as the right to human intellectual wealth. In a civilized society, it is recognized that the creator of such creations has the right to control them for their own benefit. Creation as property is based on property rights in the broadest sense, which also includes intangible property. In every aspect of intellectual property rights, the most important thing is the existence of a specific creation. These creations exist in the fields of art, science, literature, industry, and can also be a combination of these fields, each of which has a specific term (Hikmah et al., 2023).

A further consequence of the limitation of intellectual property rights is the material results that take the form of tangible objects (material objects). For example, copyright in the field of science (intellectual property rights) and the material results that embody it are books, as are discoveries in the field of patents. Therefore, what is protected by law is the right, not the embodiment of that right, which is protected by property law in the category of material objects (tangible objects). The right to own intellectual property is Although more abstract than tangible property rights, intellectual property rights are still categorized as property rights and are considered absolute in nature. Within the Indonesian civil law system, intellectual property rights are included under property law, which is divided into two branches: contract law (Article 1233 of Indonesia Civil Code) and property law in the strict sense (Article 499 of Indonesia Civil Code).

From the provisions of Article 570 of Indonesia Civil Code, it can be concluded that every property right has the following elements:

- 1) The ability to enjoy the object or right that is the subject of the property right.
- 2) The ability to supervise or control the object of the property right, for example, to transfer the property right to another person.

The law imposes limitations on the owner's ability to enjoy or control the object or right that is their property. The regulation of intellectual property rights always includes limitations on such control or use, including:

- 1) Limitations imposed by legislation,
- 2) Limitations of public decency and order. This provision implies that intellectual property rights must not conflict with public decency and order, including the use of symbols that conflict with religion and morality.
- 3) Revocation of ownership rights for the benefit of the community, provided that the revocation of ownership rights is carried out based on the law and with the payment of appropriate compensation.

Copyright

Article 1 paragraph 1 UUHC defines copyright as the exclusive right granted to a creator, which arises automatically under the declarative principle once a work has been manifested in a tangible form, subject to limitations set by applicable laws and regulations. Copyright grants the creator the authority to publish and/or reproduce their creation, along with the economic rights to obtain financial benefits from its use. In principle, copyright protection applies only to ideas that have been expressed in a concrete and original form. Copyright arises automatically without requiring formal registration. A work does not need to be published in order to obtain legal protection. The copyright attached to a work constitutes a legal right that must be distinguished from the physical ownership or control of the material object in which the work is embodied. Furthermore, copyright is not an absolute right, as its exercise is subject to certain limitations and exceptions established by law (Jurnalica et al., 2025).

Basically, what is protected by law is the creator who, through inspiration, produces each work in a distinctive form and demonstrates its originality in the fields of science, art, and literature. The creator must have the expertise to produce a work that is protected by copyright. The work must have a distinctive form and demonstrate its originality as the creation of a person based on the creator's personal abilities and creativity. In other words, a creation must have elements that reflect the creator's personal identity (alter ego). Without a creator and their alter ego, a copyright-protected creation cannot be born.

The rights of the creator and/or copyright holder are divided into economic rights and moral rights. Economic rights are the rights of a creator to profit from their creation (Ibrahim & Fakrulloh, 2025). Economic rights include the following types of rights:

- 1) Reproduction right;
- 2) Adaptation right;
- 3) Distribution right;
- 4) Public performance right;
- 5) Broadcasting right;
- 6) Cablecasting right;
- 7) Resale right;
- 8) Public lending right
- 9) The last one is known as rental right, which is the right of the Creator or Copyright Holder of cinematographic works and computer programs as well as sound recording producers to prohibit other people or parties from renting their creations for commercial purposes without their consent.

3. RESEARCH METHOD

The method used in this study is a normative juridical approach, employing both a statutory (regulatory) approach and a conceptual approach (Marzuki, 2022).

4. RESULTS AND DISCUSSION

Concept of Copyright and the Economic Rights of Songwriters

Copyright is a form of intellectual property right that arises automatically after a creation is born in tangible form, without requiring any formal registration. In the Indonesian legal system, copyright is regulated by UUHC. This law stipulates that copyright is the exclusive right of the creator or rights holder to publish or reproduce their work, without prejudice to the restrictions applicable under the provisions of laws and regulations (BAGUS LANDUNG EKA SAPUTRA, 2024).

Conceptually, copyright contains two main dimensions, namely moral rights and economic rights. Moral rights are permanently attached to the creator, as they relate to the integrity and personal honor of the work created. In contrast, economic rights relate to the financial benefits that can be obtained from the use of the work by other parties (Iswaningsih et al., 2021). In the context of music or songs, economic rights give the creator the authority to receive compensation from for each use of their work, whether in the form of performances, announcements, reproduction, broadcasting, communication, or commercial distribution (Sutra Disemadi & Kang, 2021).

These two types of rights show that copyright not only serves as a form of recognition of a person's creativity, but also as a means of protecting the economic interests of the creator (Rato et al., 2023). Economic rights give creators the opportunity to control how their work is used and to receive a fair share of the economic value generated by that work. Therefore, any use of a song without the creator's permission or without the payment of royalties constitutes a violation of economic rights, which may result in legal liability for the perpetrator.

The protection of the economic rights of songwriters also reflects the principle of fairness in intellectual property law, namely that everyone who enjoys the benefits of a creation must provide a fair reward to the party who created it. This principle is in line with the "reward to the creator" principle, whereby the law provides protection as a form of appreciation for the creator's contribution to the development of culture and the creative industry. Without an adequate protection system, creators will lose the incentive to continue creating, which will ultimately weaken the music industry ecosystem as a whole (Ritonga et al., 2024).

Economic rights in the field of music have broad social and economic dimensions. Songs as creative works are not only a means of artistic expression, but also have significant commercial value in various sectors such as entertainment, tourism, and digital media. Therefore, protecting the economic rights of songwriters not only protects individual interests, but also maintains the sustainability of the national music industry(Nugroho, 2025).

Based on Article 8 of UUHC, economic rights constitute the exclusive rights granted to creators or copyright holders to obtain financial benefits from the exploitation of their works. These rights enable the creator or copyright owner to exercise control over the economic use of the creation. Accordingly, they have the authority to:

Publication of the work

The right of publication gives the creator the authority to determine whether their work will be published for the public or not. In the context of songs, this right includes the decision to introduce a song to the public for the first time, whether through recordings, digital uploads, or the publication of musical notation. Any party wishing to publish another person's song must obtain written permission from the creator or copyright holder. Without such permission, the act of publication may be classified as copyright infringement because it violates the creator's exclusive right to control the time, manner, and form in which the song is first introduced to the public.

Reproduction of a work in any form

The right of reproduction means that the creator has control over every form of reproduction of the work, whether physical or digital. In the context of music, reproduction includes the process of copying songs onto CDs, flash drives, hard drives, or digital platforms such as Spotify, YouTube, and iTunes. Unauthorized reproduction (such as copying song files and distributing them online) constitutes a violation of economic rights. This forms the basis for the collection of royalties from digital platforms that reproduce and distribute songs on a mass scale.

Translation of creations

Translation rights give creators the authority to allow or prohibit the translation of songs into other languages. In the international music world, translations are often done so that songs can be accepted in the global market. Legally, any party wishing to translate song lyrics for commercial purposes, such as an English version of an Indonesian song or vice versa, must obtain the creator's permission. If done without permission, the translation is considered a form of reproduction and modification of the work that violates exclusive rights.

Adaptation, arrangement, or transformation of a work

This right includes modifications to the original song, such as creating *remixes*, *covers*, or rearrangements with different instruments. In the music industry, violations often occur when someone creates a new version of a song without permission from the original creator. Even if the work has a new creative touch, it still depends on the original creation. Therefore, the original creator is still entitled to royalties from adaptations or arrangements that use elements of their work. Legally, adaptation rights are a direct derivative of economic rights, and infringement of these rights can result in a claim for damages.

Distribution of the work or its copies

Distribution rights give creators control over the process of circulating and disseminating their work to the public. For example, songs released through digital music platforms, sold in physical stores, or used by third parties for commercial purposes. Distribution of a work without permission, including uploading pirated songs to websites or social media, constitutes copyright infringement. This right also forms the legal basis for LMK and LMKN to collect royalties from users who reproduce or distribute songs to the public.

Performance of works

Performance rights give creators the authority to allow or prohibit public performances of their works, whether in concerts, television shows, radio, cafes, hotels, or other public places. In the context of royalty payments, this is the aspect that most often forms the basis of LMKN billing. Every time a song is played or sung in a public place for commercial purposes, the user is required to pay royalties to the creator through the authorized LMK. The legal principle is that the use of a work for the public must be balanced with compensation to the creator.

Publication of works

The right of communication is the right to play, broadcast, or display a work to the public in any form. In the music industry, this includes playing songs in the mass media, digital publications, and broadcast media. Normatively, any public communication without permission constitutes a violation of economic rights, even if it is not accompanied by reproduction. Therefore, radio stations, television stations, and *streaming* platforms are required to have a license to broadcast songs publicly.

Communication of the work

Communication rights relate to the delivery of creations to the public through digital communication means, such as the internet, mobile phones, streaming applications, or social media networks. In the digital age, communication rights play a major role because the majority of music consumption now takes place online. Every digital platform that plays songs publicly has an obligation to pay royalties to the creators. This right ensures that creators continue to receive economic benefits from every playback of a song in the digital realm, even without physical reproduction.

Rental rights

Rental rights give creators the authority to allow or prohibit the rental of their creations to other parties, especially if the rental is commercial in nature. In the context of music, this right arises, for example, in the rental of CDs, cassettes, or music files by certain service providers. Rental without permission means the use of a work for economic gain without compensation to the creator, which can be classified as an infringement of economic rights. Rental rights ensure that any form of repeated use of a work continues to provide economic benefits to its creator.

Royalty Payment Mechanism for Songwriters in Indonesia

Copyright registration is a form of preventive legal protection provided by the state to creators, including songwriters (Kurniasari, 2022). Based on Article 64 UUHC, creators, copyright holders, or related rights owners can register their creations with the Directorate General of Intellectual Property (DJKI) to obtain a record of the creation (Machfiroh et al., 2021). Although copyright arises automatically when a creation is realized in tangible form (declarative principle), copyright registration still has important legal significance because it serves as *prima facie evidence* of ownership in the event of a dispute (Ribka & Wangkar, 2023). Thus, copyright registration serves to strengthen the legal position of creators in claiming their economic rights, including the right to royalties. The stages of song copyright registration are as follows:

Steps for Registering Song Copyright

The copyright registration procedure is carried out electronically through the official DJKI website (<https://hakcipta.dgip.go.id>) with the following steps:

- 1) Create a user account and fill out the online application form
The creator or copyright holder submits an application by providing personal data, song title, year of creation, and type of creation (music, lyrics, or both). This is in accordance with the provisions of Article 67 paragraph (1) UUHC in

conjunction with Permenkumham No. 14 of 2021 concerning the Registration of Creations and Related Rights Products.

- 2) Attach supporting documents
- 3) A copy of the lyrics or sheet music.
- 4) Audio recording evidence (MP3/WAV format).
- 5) A statement of ownership of the work.
- 6) Identity documents (ID card/NIK) and Taxpayer Identification Number (NPWP) (if applicable).
- 7) Proof of payment of registration fees.
- 8) Administrative and substantive verification by DJKI.

DJKI will examine the completeness of the documents and ensure that the work does not conflict with the law, morality, or public order.

Issuance of Copyright Certificates

After verification is approved, DJKI issues a digital Copyright Registration Certificate, which serves as official proof of ownership. The certificate contains:

- 1) The name of the creator and copyright holder,
- 2) Type of work (song/music),
- 3) Date of registration, and
- 4) The application number.

After obtaining the copyright certificate, the songwriter can register their work with a Collective Management Organization (CMO) for royalty management purposes. The CMO requires formal proof of ownership of the work in order to include the song in the CMO/LMKN national database.

The next steps are as follows:

- 1) The creator submits a list of works that have been registered with the DJKI to the CMO.
The CMO then registers these songs as works eligible to receive royalties.
- 2) The CMO tracks the use of the songs by commercial users, such as radio, television, hotels, restaurants, or digital platforms.
- 3) The LMK collects and distributes royalties based on the frequency of playback and the category of use, in accordance with the provisions of Government Regulation Number 56 of 2021 concerning the Management of Royalties for Song and/or Music Copyright.

Thus, a copyright certificate not only serves as legal proof of ownership but also as an administrative basis for songwriters to officially receive royalties through the LMK. Without a copyright certificate or registration, the LMK cannot include the song in the national data system, and the creator risks losing their economic rights.

5. CONCLUSION AND RECOMMENDATIONS

Conclusion

Based on the results of this study, it can be concluded that the mechanism for protecting the economic rights of songwriters in Indonesia actually has a strong legal basis through Law Number 28 of 2014 concerning Copyright. This law automatically grants moral and economic rights to creators once their work is realized in tangible form. However, even though the normative regulations are quite comprehensive, the implementation of the royalty payment mechanism in the field still faces various obstacles. The management of royalties through LMK and LMKN has not been fully effective, especially in terms of recording song usage, transparency of distribution, and the accuracy of the amount of royalties received by creators. In addition, violations of the economic rights of creators, both in the form of unauthorized use of songs and non-compliance in royalty payments, still occur frequently due to low legal awareness among users and weak supervision and law enforcement. This situation shows that even though regulations are in place, the effectiveness of legal protection for the economic rights of songwriters is not optimal and needs to be improved in order to provide better legal certainty and protect the economic value of creative works fairly.

Recommendations

To realize a more effective and equitable royalty payment system, efforts to strengthen various aspects, both regulatory and institutional, are needed. The government needs to improve the transparency and accuracy of the royalty management system by encouraging data integration in LMK and LMKN through the use of information technology that allows creators to monitor the use of their works more clearly. The dissemination of information regarding the legal obligations of users of creative works also needs to be expanded, especially to businesses and event organizers that use songs for commercial purposes. In addition, law enforcement must be strengthened by applying strict and consistent sanctions for copyright violations in order to provide a deterrent effect and increase compliance. On the other hand, songwriters are also advised to be more proactive in registering their copyrights and works with the LMK, as this step is the administrative

basis for obtaining official protection and royalties. With comprehensive reforms, it is hoped that the copyright protection ecosystem in Indonesia can develop more healthily and provide proportional benefits for creators.

REFERENCE

- Bagus Landung Eka Saputra. (2024a). Penyelesaian pembagian royalti hak cipta lagu bersama antara pencipta dan penyanyi. *Universitas Pancasakti Tegal*, 1(1), 91–104.
- Handoko, W. F., & Roisah, K. (2024). Pengelolaan royalti hak cipta lagu dan musik: Studi kasus pada bisnis karaoke. *UNES Law Review*, 6(3), 9561–9571.
- Hikmah, F., Yanto, A., & Ariski, K. (2023). Perlindungan hak ekonomi bagi pemilik hak cipta dalam perspektif hukum kekayaan intelektual di Indonesia. *Jurnal Pendidikan dan Konseling*, 5(2), 2257.
- Ibrahim, & Fakrulloh, Z. A. (2025). Legal study on the payment mechanism of copyright royalties and its implications in the Indonesian creative industry. *Jurnal Greenation Sosial dan Politik*, 3(2), 273–283. <https://doi.org/10.38035/jgsp.v3i2.363>
- Iswaningsih, M. L., Budiarta, I. N. P., & Ujianti, N. M. P. (2021). Perlindungan hukum terhadap tenaga kerja lokal dalam Undang-Undang Nomor 11 Tahun 2020 tentang omnibus law cipta kerja. *Jurnal Preferensi Hukum*, 2(3), 478–484. <https://doi.org/10.22225/jph.2.3.3986.478-484>
- Jamba, P. (2015). Analisis penerapan delik aduan dalam UU hak cipta untuk menanggulangi tindak pidana hak cipta di Indonesia. *Jurnal Cahaya Keadilan*, 3(1), 1693–2339.
- Jurnalica, L., Dewi, R. U., & Triningsih, A. (2025). Klaim royalti lagu dan/atau musik pencipta dan hak terkait di platform YouTube sebagai bentuk pemenuhan hak keadilan. 22(1), 53.
- Kurniasari, T. W. (2022). Kepastian hukum terhadap perlindungan pekerja outsourcing pasca Undang-Undang Nomor 11 Tahun 2020 tentang cipta kerja. *Jurnal Geuthèë: Penelitian Multidisiplin*, 5(2), 123–136. <https://doi.org/10.52626/jg.v5i2.159>
- Machfiroh, I. A., Heriawanto, B. K., & Ayu, I. K. (2021). Perlindungan hukum tenaga kerja outsourcing menurut Undang-Undang Nomor 13 Tahun 2003 tentang ketenagakerjaan dan Undang-Undang Nomor 11 Tahun 2020 tentang cipta kerja. *Dinamika*, 27(17), 2447–2461. <https://doi.org/10.1038/s41467-020-15507-2>
- Marzuki, P. M. (2022). Penelitian hukum. Kencana Prenada Media Group.
- Nugroho, O. S. (2025). Juridical review of the right to royalty payments for songwriters based on Law Number 28 of 2014 concerning copyright (Case study of Ari Bias vs. Agnes Monica). *Jurnal Ilmu Hukum*, 15(2), 494–505. <https://doi.org/10.58471/justi.v15i02>

- Rato, D., Setyawan, F., Husniah, H. R., Agustina, V. L., & Sihite, W. F. H. (2023). Konstitusionalitas pasal-pasal dalam UU cipta kerja: Telaah terhadap perlindungan hak-hak konstitusional. *SEIKAT: Jurnal Ilmu Sosial, Politik dan Hukum*, 2(3), 305–317. <https://doi.org/10.55681/seikat.v2i3.572>
- Ribka, E., & Wangkar, T. (2023). Perlindungan hukum terhadap pemenuhan hak waris anak dalam perkawinan campuran ditinjau dari hukum perdata internasional. *Lex Privatum*, 12(2), 1–13.
- Ritonga, J. S., Tanjung, N., & Permatasari, P. D. (2024). Hak kekayaan intelektual dalam hukum bisnis: Perlindungan dan penegakan hukum atas merek dan paten di Indonesia. *Ekoman: Jurnal Ekonomi, Bisnis dan Manajemen*, 2(2), 141–174. <https://jurnal.sitasi.id/ekoman/article/view/102>
- Sutra Disemadi, H., & Kang, C. (2021). Tantangan penegakan hukum hak kekayaan intelektual dalam pengembangan ekonomi kreatif di era revolusi industri 4.0. *Jurnal Komunikasi Hukum (JKH)*, 7(1), 54. <https://doi.org/10.23887/jkh.v7i1.31457>