

# Legal Certainty of Performers in Royalty Distribution Disputes Based on the Regulation of the Minister of Law Number 27 of 2025 Concerning Management Implementing Regulations

Inda Nurdahniar<sup>1</sup>, Wiwit Juliana Sari<sup>1</sup>

<sup>1</sup> Universitas Langlangbuana, Bandung, Indonesia

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## ABSTRACT

Laws and regulations in Indonesia not only provide legal protection for Creators, but also Related Rights, one of which is Performance Actors. But in practice, the Creator sues the performer for the distribution of royalties, while the event organizer often escapes responsibility. It looks problematic, on the one hand the Creator is given the exclusive right to prohibit or allow anyone to use his creation. Meanwhile, on the other hand, the performers contribute to the creations created by the Creator, so that they sell well in Indonesia. Meanwhile, if there is a problem, the Creator can prohibit the Performance Actor at any time from using his creation, even though this situation can hinder the Performance Actor from obtaining Economic Rights. The purpose of this research is to analyze legal certainty for Performers regarding the distribution of royalties in the era of the birth of Permenkum 27/2025. The research method in this article is normative juridical with a qualitative approach to laws and regulations and royalty-related problems that are rampant. The results of this study explain that based on Permenkum 27/2025, Performance Actors are not obliged to pay royalties, but this is charged to the event organizer. Where the royalty distribution mechanism is carried out through LMKN through a SILM system (distribution of royalties from LMK to Creators and Related Rights) and INSPIRATION (distribution of royalties from users to LMKN). With this legal certainty, the Plaintiff is no longer the party who is held responsible for the distribution of royalties. It is hoped that there will be no more creators who prohibit performers from performing their songs due to the uncertainty of royalty payments because it will disrupt the ecosystem of a work or even tarnish the reputation/good name of the performers.

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### Corresponding Author:

Inda Nurdahniar

Universitas Langlangbuana, Bandung, Indonesia; [indanurdahniar@gmail.com](mailto:indanurdahniar@gmail.com)

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## 1. INTRODUCTION

Copyright is an exclusive right in the form of Moral Rights and Economic Rights owned by the Creator and arises automatically based on the principle of declarative or without registration after the work is realized in real form. Thus, this right refers to the Creator, even though Law Number 28 of 2014 concerning Copyright (hereinafter abbreviated as Law 28/2014 concerning Copyright) regulates Related Rights including Performance Actors, Phonogram Producers, and Broadcasting Institutions, where Performance Actors get protection for Moral Rights and Economic Rights while Phonogram Producers and Broadcasting Institutions only get protection for Economic Rights.

The arrangement shows that both the Creator and the Performer get the same portion of protection, namely the protection of Moral Rights and Economic Rights. Basically, the law should be made equally for all parties and not for some groups or interests only. This is important so that there is synergy – collaboration between the Creator and the Performance Performer on a work produced.

In fact, several creators in Indonesia have filed lawsuits against performance actors related to the distribution of works without permission from the creator. Some of the cases that have emerged include: First, on January 30, 2025, the Central Jakarta Commercial Court ruled that Agnez Monica was found guilty of violating Copyright by performing the song "Bilang Saja" at three commercial concerts in Surabaya, Jakarta and Bandung in 2023. Therefore, Agnez Monica also had to pay compensation of 1.5 billion. However, at the Cassation level on August 11, 2025, this case was won by Agnez Monica, so the previous decision was canceled (Citrawinda, et., all, 2026). Second, the case of Alm. Vidi Aldiano was sued by Keenan Nasution for 24.5 billion for allegedly violating Copyright by performing the song "Nuasa Bening" in 31 Performances. However, the court stated that it accepted the exception from Alm. Vidi Aldiano, because Keenan Nasution's lawsuit is considered a formal defect where the lawsuit does not include a digital platform as a co-defendant. Therefore, the lawsuit is not admissible or *Niet Ontvankelijke Verklaad* or *NO* (Putra, et. All., 2026). Third, in the case of Once Mekel, Ahmad Dhani prohibited the person concerned from singing his song because Once Mekel had left the Dewa 19 Band Group, so Once Mekel had to ask for permission and pay royalties to Ahmad Dhani, but on Once's side stated that it was a matter for the Collective Management Institution (LMK) (Sigar, et., all., 2026). Fourth, in 2025 Lesti Kejora is reported by Yoni Dores (Dedy Dores' Younger Brother Alm) the creator of the song "Badai Ranting Kering" which was re-sung (*cover*) by Lesti Kejora and uploaded on Youtube without official permission from the Owner. At the time of the Right to Examine Law 28/2014 on Copyright at the Constitutional Court, Lesti Kejora as a witness was also present and gave her statement that "she felt that she was criminalized by the unclarity of legal norms". In early 2026, the Lesti Kejora case was declared closed because no criminal elements were found (Faizin, et., all., 2026).

From these cases, researchers see that on the one hand the Creator is given the exclusive right to prohibit or allow anyone to use his creation. Meanwhile, on the other hand, the performer contributes to the creation created by the Creator because of the color of the sound, the artist's expertise in performing the song in question so that it sells well in the Indonesian music industry. Meanwhile, if there are problems such as unclear royalty payments, the Creator can prohibit the Performance Performer at any time from performing the song, this actually hinders the Performance Performer from getting Economic Rights. Hopefully the Performance Performer is always made as the party who must be responsible, this seems to damage the good name and/or integrity of the Performance Performer. Therefore, the purpose of this research is to analyze the legal certainty of *performers* in Royalty Distribution Disputes Based on the Regulation of the Minister of Law Number 27 of 2025 concerning the Implementation Regulation of Government Regulation Number 56 of 2021 concerning the Management of Song and/or Music Copyright Royalties (hereinafter abbreviated as Permenkum 27/2025).

## Literature Review and Problem Formulation

This idea of legal certainty was first introduced by Gustav Radbruch in his book *entitled "Einführung in die Rechtswissenschaften"* (Marbun, 2021). Legal certainty is interpreted as clarity of norms so that it can be used as a guideline for the people who are subject to this regulation. The meaning of this certainty can be interpreted as that there is clarity and firmness towards the enactment of the law in the community. This is so as not to cause a lot of misinterpretations. According to Van Apeldoorn, "legal certainty can also mean what can be determined by law in concrete matters" (Prayogo, 2016). The Indonesian Legal System places legal certainty in Article 28D paragraph (1) of the 1945 Constitution (hereinafter abbreviated as the 1945 Constitution) which states; "That everyone has the right to fair legal recognition, guarantee, protection and certainty and equal treatment before the law (Wibowo, 2020). Thus, regulations under the 1945 Constitution must be in harmony with this provision and ensure that every enacted regulation provides legal certainty to every level of society (not just for interested parties).

Regulations on the protection of Intellectual Property Rights, especially Copyright, have been regulated in Law 28/2014 on Copyright. This rule regulates Creator Rights and Related Rights (one of which is Performance Performers). Both the Creator and the Actor of the Arrangement have moral rights and economic rights. In other words, this rule provides an equal space for both the Creator and the Actor. This is none other than to create a good ecosystem in the creative economy. However, Law 28/2014 does not explain in detail the mechanism of obtaining Economic Rights (or often called Royalty). This mechanism is actually regulated in Government Regulation Number 56 of 2021 concerning the Management of Song and/or Music Copyright Royalties (hereinafter abbreviated as PP 56/2021 concerning Royalty Management) and Regulation of the Minister of Law and Human Rights Number 9 of 2022 concerning Implementing Regulation of PP 56/2021 concerning Royalty Management. However, this rule still provides legal uncertainty, especially to the Performer, because the Performer is always the main party required to fulfill the payment of Royalties to the Creator. Some previous research focused on a case study of a verdict, while this study discussed the whole and paid more attention to the same case so that legal certainty was seen, especially for the performer.

This research is important to find legal certainty for *performers* after the presence of Ministerial Regulation 27/2025, especially if there is a dispute regarding the distribution of royalties, so that Performers get clarity on who should pay royalties and further Performers can maintain Economic Rights while maintaining their good name, image and integrity. Thus, the focus of this research is the Legal Certainty of *Performers* in Royalty Distribution Disputes and the Royalty Payment Mechanism Based on Permenkum 27/2025.

## 2. METHODS

The research method used is a normative juridical research method with a qualitative approach, namely analyzing various laws and regulations in the field of Copyright, especially regulating the distribution of royalties, namely Law 28/2014 on Copyright, PP 56/2021 on Royalty Management and Pemen 27/2025 which is then associated with royalty problems that are rampant including the case of Agnez Monica and Ari Bias, Alm. Vidi Aldiano and Keenan Nasution, Ahmad Dhani and Once Mekel and Lesti Kejora and Yoni Does. Law 28/2014 on Copyright describes the existence of balanced protection efforts for Creators and Performance Performers both related to Moral Rights and Economic Rights. Although there has been Government Regulation 56/2021 on Royalty Management, in fact the mechanism for the protection of Economic Rights still poses a prolematic until mid-2025, so it often causes conflicts for Creators and Actors. Often the performer is placed in a position where he cannot enjoy economic rights even though the person concerned also has a considerable contribution to a copyrighted work but must be constrained by the prohibition of using the work due to the unclear distribution of royalties. The presence of Permenkum 27/2025 concerning Royalty Management Implementing Regulations can provide room for legal certainty, especially for *performers*.

### 3. FINDINGS AND DISCUSSION

Talking about Intellectual Property Rights can be interpreted as ownership of works produced from human intellect, where the work is an intangible material both in science and technology. This intellectual property right can be classified into seven parts, one of which discusses copyright (Nurdahniar, 2016). Copyright is part of Intellectual Property Rights whose discussion covers art, literature and science. Based on Law 28/2014 on Copyright, "Copyright is the exclusive right of the creator that arises automatically based on the declarative principle (without registration) after a work is realized in tangible form without reducing restrictions in accordance with the provisions of laws and regulations." The purpose of copyright is to protect the rights of the creator in distributing, selling or making derivatives of the work made. There are two rights in copyright, namely Moral Rights and Economic Rights (Muthmainnah, et. all., 2022). Economic Rights are the right to benefit from their creations while Moral Rights are rights inherent in the Creator's person (Yaman, et. all., 2024).

In addition to Creators, Law 28/2014 on Copyright also provides protection to other parties or called Related Rights, one of which is Performance Actors. Based on Article 20 of Law 28/2014 concerning Copyright, Actors of Intent receive protection related to Moral Rights and Economic Rights. This shows that this protection is not only intended for the benefit of one party but also other parties who are interconnected with each other in order to create a synergy in the development of the creative economy. Moral Rights include the name listed unless otherwise agreed, not to distort, mutilate, or modify the work that may harm one's honor or reputation unless otherwise agreed. Meanwhile, Economic Rights include, the right to exercise oneself, grant permits or prohibit other parties:

- a. Broadcasting or Communication of the Performance Performers' performances; (unless the performer has been given permission or broadcast and communication again that has been given permission by the broadcasting institution that first got permission from the performer)
- b. The fixation of his unfixed performance;
- c. Duplication of the Fixation of his performance in any way or form;
- d. Distribution of Fixation of copies; (does not apply to performance works that have been fixed, sold or transferred)
- e. rental of the Fixation of the show or a copy thereof to the public;
- f. provision of a publicly accessible fixation of the show.

In addition, Based on Article 23 paragraph 5 of Law 28/2014 concerning Copyright states, "Everyone can make Commercial Use of Works in a performance without asking permission in advance from the Creator by paying a reward to the Creator through the Collective Management Institution (LMK)". This sometimes causes problems where the Creator does not receive a proper reward, while the Performer feels that he has paid, feels that the song is a hit by him, but suddenly the Performer is sued and prohibited from performing the creation by the Creator. Therefore, Economic Rights can be stopped. Thus both the Creator and the Performer are subjects who are protected by this rule. However, often the protection is only focused on the artwork created without paying attention to the fact that as a performer he is entitled to certain rights. So it is clear that the implementation of Law 28/2014 on Copyright has not achieved the protection that is the purpose of the law (Sukmaningsih, et. all., 2018).

In fact, in Indonesia, often the Creator and the Performer are involved in disputes, especially related to the distribution of royalties, for example who should pay the royalty considering that there are third parties such as *live streaming* who use the work, how the royalty payment mechanism is because often LMK does not fully give rights to the Creator or Performance Performer and so on. This happened in the case of Agnez Monica Vs Ari Bias, Alm. Vidi Aldiano Vs Keenan Nasution, Once Mekel Vs Ahmad Dhani, Lesti Kejora Vs Yoni Dores (Hereinafter referred to as First, Second, Third, Fourth Cases).

In the First Case, Agnez Monica was sued by Ari Bias for singing the song "Say Only", Ari Bias as the Creator felt that Agnez Monica did not pay royalties to her for several concerts that Agnez Monica had done. Agnez Monica is required to pay damages of 1.5 billion. In the South Jakarta Commercial Court Decision, Agnez Monica was found guilty and required to pay compensation. However, at the

cassation level, Agnez Monica won the case with the consideration that the one who had to pay the royalty was the organizer or in other words *the EO (Event Organizer)*. The Cassation Decision was issued on August 11, 2025, which is not the same or not regulated in GR 56/2021 concerning Royalty Management, because the rule does not regulate the provision that the organizer must pay royalties. In fact, the rule that the organizer is obliged to pay royalties is in the regulation of Permenkum 27/2025, to be precise promulgated on August 7, 2025. This illustrates the allegation that the judge applied new rules to this case because it was only 5 days after the issuance of the Agnez Monica vs Ari Bias Cassation Decision. Even though the new rules must not apply retroactively (Non-Retroactive Principle). Basically, the new regulation has provided legal certainty because based on Article 20 of Permenkum 27/2025 states that "the obligation to pay royalties for the use of songs and/or music in public services of a commercial nature is the responsibility of the event organizer" or it can be said *EO*. In other words, for this reason, royalty payments are not a burden on the *performers*. However, the Supreme Court should issue guidelines for the implementation of Law 28/2014 on Copyright and its derivatives, including Permenkum 27/2025 so that there is no disparity in decisions.

In the Second Case, Keenan Nasution sued Alm. Vidi Aldiono amounted to 24.5 billion for singing the song "Nuansa Bening" at several concerts over a long period of time. Keenan Nasution's lawsuit was declared *NO* or in other words, the judge accepted an exception from Alm. Vidi Aldiano because the judge considered Keenan Nasution's lawsuit to be formally flawed where the person concerned did not list Digital Platforms such as Spotify, YouTube Music, Apple Music as parties that should be included in the lawsuit (also defendant). However, if referring to Article 2 paragraph 4 of GR 56/2021 concerning Royalty Management, it does not explain in detail commercial public services in digital and analog forms, but instead it is regulated in Permenkum 27/2025, where one of these digital forms is *streaming* (in this case Spotify is included in that type). In other words, before the new rule, there was no regulation about it, so the parties to the dispute, especially Keenan Nasution as the Plaintiff, did not include it in the defendant, but with the presence of the new rule, the position of this *streaming* became clear (unbiased). In other words, this is a legal certainty, especially for performers. Where in the future, the Performance Performer or performers will no longer be sued by the Creator for their songs that are displayed or played on certain *streams*.

In the third case, Once Mekel Vs Ahmad Dhani is somewhat different from the previous two cases, where Once Mekel left Ahmad Dhani's band (Dewa 19), in his statement Ahmad Dhani forbade Once Mekel to perform his songs, in other words Once Mekel had to ask permission from Ahmad Dhani and pay royalties. Meanwhile, Once Mekel stated that it was the task of LMK. Even though the song created by Ahmad Dhani is very attached to the sound characteristics of Once Mekel, for example the song titled "Arjuna", "Half Breath" compared to the Dewi-Dewi version because it is more iconic. This situation makes Once Mekel as a Performance Actor who contributed to Ahmad Dhani's creation lose Economic Rights, even though based on Article 23 paragraph 1 of Law 28/2014 concerning Copyright, Performance Performers are entitled to Economic Rights. This is due to the unclear management of royalties.

In terms of collecting song and/or music royalties in Indonesia, there are institutions that have the authority to carry out the collection, distribution and management of these royalty rights. The institutions in question include LMK and LMKN as stated in the provisions of Law 28/2014 on Copyright which are then further regulated by technical rules, one of which is PP 56/2021 concerning Royalty Management. The purpose of the formation of this Government Regulation is as a form of optimizing the function of copyright royalty management, especially in the field of songs and/or music (Husnun U.A., et., all., 2021). However, based on Article 23 paragraph 5, Article 87 of Law 28/2014 concerning Copyright, the withdrawal of royalties is the authority of LMK, while based on Article 12 of PP 56/2021 concerning Royalty Management it is explained that the withdrawal of royalties is the authority of the National Collective Management Institution (LMKN). The existence of LMKN has an impact on social uncertainty for Creators and Copyright Owners. In practice, LMK has long functioned as a forum for Creators to manage their Economic Rights independently. While LMKN does not have

legitimacy in Law 28/2014 on Copyright, there is a dualism of authority that confuses the Creators. Uncertainty in the distribution of royalties due to the duality of LMK and LMKN makes it difficult for many creators to obtain economic rights due to late payments. So it can be concluded that these two rules overlap (*overlapping*) against the authority of LMK and LMKN.

The presence of Permenkum 27/2025 is a follow-up to PP 56/2021 concerning Royalty Management, this regulation also aims to improve the previous rules, which are still felt to have many shortcomings so that they cause various problems until mid-2025, especially who is responsible for paying royalties. The obligation of business actors to pay song royalties commercially in the public space does not originate from a single norm, but from a comprehensive normative construction that includes regulative, institutional, economic, technological, and social aspects. The concentration of royalty withdrawals through LMKN, strengthening the role of LMK, and the implementation of digital systems such as *the one gate policy*, SILM, and Inspiration System show efforts to improve royalty governance to be more transparent, accountable, and efficient, while overcoming the problem of double billing and weak royalty distribution (Permatasari, et.al., 2026). Thus, this rule provides legal certainty regarding the governance of royalty distribution.

Fourth, the case of Lesti Kejora and Yoni Dores, where Lesti Kejora covered the song of the late Dedi Dores then uploaded it on Youtube and was sued but in the end the case was closed because it did not meet the criminal elements. Lesti Kejora felt criminalized. Indeed, basically Law 28/2014 on Copyright and Government Regulation 56/2021 on Royalty Management have not expressly regulated third parties or users, in this case Youtube. However, based on Article 20 paragraph 4 of Permenkum 27/2025, it clearly states that those who are obliged to pay royalties for the use of songs and/or music in Commercial Public Services are the responsibility of event organizers or business place owners. Furthermore, Article 21 of Permenkum 27/2025 explains in detail Commercial Public Services in the form of Analog and Article 22 of Permenkum 27/2025 explains in detail Commercial Public Services in the Digital Realm, one of which is streaming (for example, Youtube, Spotify).

From the four cases above, it can be concluded that the most fundamental problem is the distribution of royalties (who is obliged to pay and what are the procedures or payment mechanisms). Before the enactment of Permenkum 27/2025, Performance Actors were made the most disadvantaged party, even though the person concerned collaborated on a work so that the work has more economic value and is not necessarily the same if performed by other Performance Performers. Performance performers such as Agnez Monica and Vidi Aldiano were suddenly required to pay tens of billions of royalties, while Once Mekel was actually prohibited from performing songs created by Ahmad Dhani, even though all of Once Mekel's hit songs were created by Ahmad Dhani and Lesti Kejora felt criminalized due to the uncertainty of the previous rules.

The basic certainty in a rule is important, as a guideline for the public to get clarity and not cause multiple interpretations, thus minimizing the occurrence of conflicts. In this case, it is probably unethical when the Creator and the Performer who used to have collaborated, are suddenly sued with a lawsuit value of billions of rupiah, even though the Performance Performer takes part in popularizing the song created by the Creator. This creates a gap, where the author sees the Creator as more *powerful* than the Performer, it is not uncommon for the Performer not to get the appropriate Royalty and indirectly harm the Performer, not only material but also immaterial (dignity and/or good name) reputation that is tarnished by disputes or legal cases. In other words, it has damaged the reputation of the Performers that have been built for a long time. Even though Law 28/2014 on Copyright puts the two in the same position. Unfortunately, PP 56/2021 on Royalty Management does not provide legal certainty, especially for Performers. However, the presence of Permenkum 27/2025 has provided clarity that the Event Organizer is obliged to pay Royalties (both analog and digital) through LMKN and will be distributed to LMK and then to the creators and performers of the show.

In short, this mechanism is that users or users of commercial services either in analog and/or digital form register and apply for a license directly through INSPIRATION LMKN, then the system will calculate the royalty rate automatically. After being verified by the system, the user will receive *invoices*

in the form of a payment code and after the payment is completed or confirmed, the system will automatically issue a Digital License Certificate that can be downloaded and printed as official proof that the person concerned has fulfilled the royalty payment obligation in accordance with laws and regulations. The amount of royalties that must be paid is regulated in the Decree of the Minister of Law and Human Rights Number HKI.2.OT.03.01-02 of 2016 concerning the Ratification of Royalty Rates for Users Who Make Commercial Use of Creations and/or Rights Products Related to Music and Songs (Ezra., et., all., 2024). In addition, the Creator and/or the related Rights Owner becomes a member of one of the LMKs in Indonesia, then the LMK's task is to enter the data of the relevant Creator and/or Right Owner into the PDLM or the Song and Music Data Center through the SILM system. SILM functions to record what songs are played by commercial users (in this case, analog and/or digital). This determines who is entitled to receive royalties. From there, the nominal amount that must be paid by commercial users to LMKN will appear, then LMKN will distribute the funds to each LMK after deducting the limited operational costs (Permenkum 27/2025 concerning Royalty Management Implementing Regulation limits only 8 (eight) percent of the total royalty income collected by LMKN). LMK will forward the distribution to the creator and/or related rights holders. This rule change is a good step towards governance or the royalty payment mechanism to be more transparent, efficient and accountable, but it is undeniable, this new rule needs a longer time adjustment to be implemented optimally. However, in essence, Permenkum 27/2025 has provided room for legal certainty for performers to avoid lawsuits by creators for the unexplained distribution of royalties (either parties or institutions that distribute them).

#### 4. CONCLUSION

Based on research that has been conducted by researchers, that the change in rules related to the distribution of royalties (who is obliged to pay and how the mechanism) from PP 56/2021 concerning Royalty Management to Permenkum 27/2025 is still new and may take a long time to be implemented optimally, but the presence of new rules has provided legal certainty, especially for performers. Because based on the new rules, the event organizer is the party who is obliged to pay royalties.

The royalty payment mechanism in Indonesia has indeed changed, especially after the arrival of the new regulation of Permenkum 27/2025 concerning Royalty Management Implementing Regulations and changing the *landscape* from the old rules, namely institutional restructuring, the existence of SILM integrated with PDLM, and the INSPIRATION system making the organizer the party who is obliged to pay royalties (not artists or singers). This new rule is expected to reduce disputes between Creators and Performers, especially in the distribution of Royalties.

The presence of Permenkum 27/2025 has provided room for legal certainty, especially for performers, but I think problems or disputes that occurred before the existence of this rule should not be applied to the new rule because it is worried that it will violate the non-retroactive principle. In addition, strict supervision from LMKN to LMK must be carried out properly (i.e. at least once every 1 year) so that the capabilities of these institutions can still be maintained in transparency.

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Peraturan Menteri Nomor 27 Tahun 2025 tentang Peraturan Pelaksanaan Peraturan Pemerintah Nomor 56 tahun 2021 tentang Pengelolaan Royalti Hak Cipta Lagu dan/ Musik  
Keputusan Menteri Hukum dan HAM Nomor HKI.2.OT.03.01-02 Tahun 2016 Tentang Pengesahan Tarif Royalti untuk Pengguna yang Melakukan Pemanfaatan Komersial Ciptaan dan/atau Produk Hak Terkait Musik dan Lagu