



RESEARCH ARTICLE

The Liability Of User-Generated Content-Based Digital Service Platforms For Copyright Infringement Following Constitutional Court Decision No.84/PUU-XXI/2023

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Abstract

The rapid advancement of information and communication technology has been accompanied by the increasing use of digital service platforms by various segments of society, facilitating the display and dissemination of creative works. However, this development has also led to the unauthorized use of copyrighted works by third parties. This study aims to analyze the responsibility of user-generated content (UGC)-based digital service platforms concerning copyright infringement, particularly in light of Constitutional Court Decision No. 84/PUU-XXI/2023, which broadens the interpretation of Article 10 of the Copyright Law regarding UGC-based platforms. This research employs a normative juridical method, focusing on the analysis of legal norms and their application. The findings reveal that Constitutional Court Decision No. 84/PUU-XXI/2023 affirms the heightened responsibility of digital platforms to proactively prevent copyright violations. Digital platforms are expected to implement preventive measures, including content filtering mechanisms, to minimize the risk of copyright infringement before publication.

Keywords: Copyright Infringement, Digital Service Platforms, User-Generated Content

Introduction

Intellectual Property Rights (IPR) grant exclusive rights to creators over the use of their creations for a certain period. These exclusive rights serve as a legal protection mechanism that enables creators to maintain control and ownership over their works (Atmoko et al., 2023).

Copyright is one of the most comprehensive forms of intellectual property rights, as it protects various forms of creative works, including literary, artistic, musical, cinematographic works, software, and other creations produced through creative processes (Badru Jaman et al., 2021).

Copyright, as defined under Article 1 paragraph (1) of Law No. 28 of 2014 on Copyright, is "the exclusive right of the creator that arises automatically based on declarative principles, once a creation is realized in tangible form, without prejudice to limitations in accordance with statutory provisions." This declarative principle means that to prove ownership of copyright, registration is not mandatory because copyright arises automatically. Whether registered or not, copyright holders are entitled to legal protection (Nurusyifa, 2023).

The exclusive nature of copyright provides the creator or copyright holder with the sole right to determine the use of their work or idea (Munandar & Sitanggang, 2008). These exclusive rights consist of two essential components: moral rights and economic rights. Moral rights are inherent to the creator and cannot be separated from the creator during their lifetime. However, the exercise of these rights may be transferred through a will or other legal means as stipulated by law after the creator's death (Soelistyo, 2011). Moral rights grant the creator the authority to maintain the integrity of their work and to prevent any distortion or modification that could harm their honor or reputation (Ernatudera et al., 2023).

On the other hand, economic rights give creators the ability to gain financial benefits from their works. Economic rights

include the exclusive right to publish, reproduce, and grant licenses for the use of the work, and these rights can be transferred to other parties (Djumahana & Djubaedillah, 2003).

The rapid advancement of information and communication technology, coupled with the increasing use of digital service platforms by diverse segments of society, has significantly facilitated the creation, dissemination, and public display of creative works. However, these digital service platforms have also become a medium for widespread copyright infringements. Copyright infringement occurs when a protected work is used without permission from the creator or copyright holder, thereby violating their exclusive rights (Simangunsong et al., 2020). The ease provided by technology, especially through digital service platforms, has opened opportunities for the unauthorized and commercial use of copyrighted works, particularly songs, without the payment of royalties or obtaining prior consent from the creators. The high number of copyright infringement cases is driven by the economic value of copyright, as creative works with high originality hold significant potential for exploitation (Noviriska, 2022).

Although Law No. 28 of 2014 on Copyright was enacted to provide legal protection for copyright holders amidst technological advancements, it remains insufficient to address the growing problem of copyright infringement, particularly on user-generated content (UGC)-based digital service platforms. These platforms are designed to allow users to create, upload, display, and share content such as videos, images, and audio, often for monetization purposes (Gautama, 2022). However, such content often contains copyright infringements. Legal enforcement against digital service platform providers that continuously permit copyright violations remains challenging due to the absence of clear provisions regarding the liability of digital service platforms under the current Copyright Law.

The prevalence of copyright infringement on digital platforms has raised significant concerns among creators, including Melly Goeslaw, a renowned Indonesian songwriter whose works have been used without permission on a UGC-based platform, "Likee." In response, Melly Goeslaw, together with PT. Aquarius Pustaka Musik and PT. Aquarius Musikindo, filed a petition for judicial review of the Copyright Law with the Constitutional Court under Case No. 84/PUU-XXI/2023.

This petition questioned the constitutionality of Articles 10 and 114 of the Copyright Law, which only prohibit marketplace

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operators from allowing the circulation of infringing goods, yet do not clearly regulate the liability of digital service platforms. In fact, many digital platforms actively facilitate user-generated content that violates copyright, without providing appropriate economic compensation, such as royalties, to the creators.

The absence of explicit provisions regarding the liability of UGC-based platforms in the Copyright Law creates a legal vacuum, allowing digital platforms to escape responsibility for copyright infringement and the resulting economic losses suffered by copyright holders.

Based on this background, this research seeks to analyze the liability of user-generated content (UGC)-based digital service platforms for copyright infringement following Constitutional Court Decision No. 84/PUU-XXI/2023.

Method

This study employs a normative juridical research method, which focuses on analyzing legal principles and norms as stipulated in positive law (Ibrahim, 2006). The normative juridical approach is used because this research relies on the examination and analysis of secondary data and legal literature to address the issues under study (Soekanto & Mamudji, 2014).

Data collection in this research is conducted through a comprehensive literature review, involving a systematic analysis of written legal materials obtained from various credible sources (Muhaimin, 2020). The data utilized in this study are classified as secondary data, which include primary, secondary, and tertiary legal materials.

Primary legal materials consist of statutory regulations that are analyzed based on their hierarchical order, including laws and other binding legal instruments relevant to the subject matter (Marzuki, 2006). Secondary legal materials comprise scholarly works, such as textbooks authored by renowned legal experts, peer-reviewed legal journals, academic articles, legal commentaries, and case law analyses that provide interpretation and discussion of the primary materials (Ibrahim, 2006). Tertiary legal materials function as supplementary references that offer clarification or explanations of both primary and secondary materials, including sources such as newspapers, online articles, and other internet-based references.

The use of these layered sources aims to ensure a comprehensive understanding of the legal framework and scholarly discourse on the responsibility of user-generated content (UGC)-based digital service platforms in relation to copyright infringement, particularly in the context of Constitutional Court Decision No. 84/PUU-XXI/2023.

Results and Discussion

Liability of User-Generated Content-Based Digital Service Platforms as Electronic System Operators for Copyright Infringement under Indonesian Legislation

Technological developments, particularly digital service platforms based on user-generated content (UGC), have brought revolutionary impacts on the promotion of musical works. Platforms such as YouTube, TikTok, and Instagram allow songwriters to leverage user creativity to expand the reach of their works. In the digital era, user-generated content (UGC) has become a highly effective promotional tool. When individuals upload videos using a specific song as background music or create a cover version, this creates an organic marketing ecosystem. Songs featured in such content often go viral, thus helping songwriters gain significantly greater exposure compared to traditional promotion methods.

Although UGC-based digital service platforms bring many positive impacts, they also present various challenges, especially for copyright holders. Some of the most common negative impacts include:

1. Copyright Infringement

One of the main issues faced by copyright holders is the unauthorized use of their works. On platforms like YouTube and TikTok, users often use songs as background music without

regard to copyright regulations. Even though these platforms provide content management systems to take down copyright-infringing content, violations still frequently occur, particularly by users who re-upload copyrighted works illegally.

2. Difficulty in Monitoring and Enforcing Copyright

The vast volume of content uploaded daily to UGC platforms makes it difficult for copyright holders to monitor all uses of their works. Some infringements may go undetected or require a long time to address, potentially causing financial and reputational harm.

3. Uncontrolled Duplication and Dissemination

Digital content can be easily duplicated and widely disseminated without the copyright holder's permission. Songs intended to be exclusive may circulate freely across platforms, diminishing their commercial value. For instance, pirated recordings or unauthorized remixes are often uploaded without permission, harming the original creators.

Given the negative consequences of the rapid development of such digital service platforms, efforts to protect song copyrights face significant obstacles in law enforcement against platform operators that continuously allow copyright infringements due to a legal vacuum in Law Number 28 of 2014 on Copyright, which does not explicitly regulate the legal liability of digital service platforms.

Regarding the liability of digital service platforms, every digital platform as an Electronic System Operator (ESO) has a responsibility for content that violates laws and regulations on their platforms, as governed by the safe harbor policy concept. The "safe harbor" concept essentially provides protection to those who meet the prescribed requirements from liability for violations committed by third parties (Lilla & Tropova, 2018). Thus, safe harbor refers to a set of conditions that allow electronic system providers to be exempt from liability for potential copyright infringement, provided they take specific steps to cooperate with copyright holders in enforcing their rights (Sihombing et al., 2021).

Based on this safe harbor policy doctrine, digital platforms can be released from legal liability if they have adequate control systems, such as reporting mechanisms and procedures to remove content that infringes copyright, which enable copyright owners to file claims if their works are used without authorization. This aims to give copyright holders a way to protect their rights. The safe harbor policy doctrine encourages platforms to proactively monitor content and ensure that copyrights are respected and protected (Sihite et al., 2025).

In Indonesia, the Safe Harbor Doctrine is regulated under Minister of Communication and Information Technology Regulation No. 5 of 2020 on Private Scope Electronic System Operators (ESO). This regulation contains provisions on the safe harbor principle, which also applies to UGC-based Private Scope Electronic System Operators. According to Article 1 point 7 of this regulation, Private Scope ESO for UGC is defined as "Private Scope ESO whose provision, display, uploading, and/or exchange of Electronic Information and/or Electronic Documents are carried out by users of the Electronic System."

UGC-based Electronic System Operators are legal subjects whose governance and content provisions, including Electronic Information and/or Electronic Documents, are regulated. UGC-based Private Scope ESOs are obligated to ensure that: a. Their Electronic Systems do not contain prohibited Electronic Information and/or Electronic Documents; and b. Their Electronic Systems do not facilitate the dissemination of prohibited Electronic Information and/or Electronic Documents.

Prohibited Electronic Information and/or Electronic Documents are those that: Violate statutory provisions; Disturb public order and cause public unrest; and Provide methods or access to prohibited Electronic Information and/or Electronic Documents, as stipulated in Article 9 of Ministerial Regulation No. 5/2020.

Specifically, the safe harbor doctrine is regulated under Article 11 of Ministerial Regulation No. 5/2020, which states that Electronic System Operators will not be held legally liable if they have fulfilled their obligations to ensure their systems neither

contain nor facilitate the dissemination of prohibited content (Article 9(3)); have governance mechanisms regarding prohibited content, including public-accessible reporting mechanisms for complaints (Article 10); provide information to users uploading prohibited content to assist supervision and enforcement; and terminate access to prohibited Electronic Information and/or Electronic Documents (Ikesha Pieter et al., 2024).

Essentially, Article 11 mandates UGC-based digital platform operators to ensure that all content displayed does not violate laws and regulations. If content contains copyrighted works, such content must be authorized by the copyright holder. To ensure that their electronic systems do not host infringing content, operators are required to have proper governance mechanisms and reporting facilities and are obliged to follow up on complaints or reports regarding prohibited content. Upon receiving such reports, UGC-based ESOs are obliged to take down or delete the prohibited content.

Digital service platforms that fail to fulfill these obligations cannot be exempted from legal liability for copyright-infringing content hosted on their platforms. Therefore, even though infringing content may not be directly created by platform providers, these providers still bear responsibility for their role in disseminating such content. By monitoring and controlling uploaded content, platforms should be able to identify potential copyright-infringing content early. Hence, prompt removal of infringing content must be carried out without delay.

Thus, platform providers/operators cannot fully evade legal liability by claiming that they are not the direct creators of the infringing content on their platforms, as, at the very least, they participate in the dissemination of copyright-infringing content.

1.1 Petition for Judicial Review of Article 10 and Article 114 of the Copyright Law

The responsibility of digital platforms is not limited merely to the removal and blocking of content that infringes copyright; there must be strict sanctions imposed on platform operators who allow copyright infringements to occur. The Copyright Law itself has not yet regulated prohibitions and sanctions against digital platform operators that knowingly allow copyright violations. As a result, copyright holders who suffer losses find it difficult to pursue legal accountability from digital platform operators.

Due to the legal vacuum in the Copyright Law, PT. Aquarius Pustaka Musik, PT. Aquarius Musikindo, and singer Melly Goeslaw were prompted to file a petition for judicial review of the Copyright Law before the Constitutional Court, as decided in Constitutional Court Decision No. 84/PUU-XXI/2023. They contested Article 10 and Article 114 of the Copyright Law, arguing that these articles fail to provide legal certainty as they do not enable the imposition of liability on User-Generated Content (UGC) digital platform providers, given that digital platforms are not classified as marketplace operators under the law.

Article 10 and Article 114 of the Copyright Law are stipulated as follows:

Article 10: *"Operators of trading venues are prohibited from allowing the sale and/or reproduction of goods resulting from copyright and/or related rights infringements in the trading venues they manage."*

Article 114: *"Any person managing a trading venue in any form, who knowingly and intentionally allows the sale and/or reproduction of goods resulting from copyright and/or related rights infringements in the trading venue they manage as referred to in Article 10, shall be subject to a maximum fine of Rp100,000,000.00 (one hundred million rupiah)."*

The content of these two provisions under review does not provide adequate and fair legal protection. Currently, the application of the Copyright Law is limited to physical marketplaces, while the rapid development of digital service platforms based on user-generated content has not yet been accommodated. Social media and other digital service technologies hold enormous potential for copyright

infringement, but the legal vacuum means that digital platform operators, who are not part of a traditional marketplace ecosystem, are not subject to the prohibitions and criminal sanctions under Article 10 and Article 114 of the Copyright Law. Ideally, other digital platform operators should also be subject to these provisions. As a result, there is a tangible state of legal uncertainty, preventing aggrieved parties from obtaining fair legal protection.

Through the judicial review of the Copyright Law, the Constitutional Court, in Decision No. 84/PUU-XXI/2023, partially granted the petition and declared that Article 10 of Law No. 28 of 2014 on Copyright, which states: "Operators of trading venues are prohibited from allowing the sale and/or reproduction of goods resulting from copyright and/or related rights infringements in the trading venues they manage" is unconstitutional and has no binding legal force insofar as it is not interpreted as: "Operators of trading venues and/or Digital Service Platforms based on User Generated Content (UGC) are prohibited from allowing the sale, display, and/or reproduction of goods resulting from copyright and/or related rights infringements in the trading venues and/or digital services they manage."

This Constitutional Court decision provides legal protection to copyright holders whose works are available on digital service platforms. This aligns with Philipus M. Hadjon's theory of legal protection, which conceptualizes legal protection as a safeguard for human dignity and recognition of human rights possessed by legal subjects under the law to prevent arbitrariness (Hadjon, 2007).

In this context, the protected human right is the right of Indonesian citizens as copyright holders, where the element of legal protection emphasized by this ruling is the certainty that UGC-based digital platform operators are prohibited from allowing the display of content that infringes copyright. In other words, any content containing a copyrighted work must have prior permission from the creator or copyright holder/related rights holder, ensuring that copyright holders are respected (moral rights) and that their economic rights are preserved.

Although the Constitutional Court (MK), through its ruling, has expanded the interpretation of Article 10 of the Copyright Law—meaning that UGC-based digital platform operators are now legally accountable if copyright infringement occurs on their platforms—the provision of criminal sanctions as regulated under Article 114 remains unchanged. Thus, the formulation of Article 114 regarding criminal enforcement has not yet been harmonized with the expanded norm of Article 10, potentially leading to enforcement difficulties, particularly when seeking to hold UGC digital platform operators accountable for permitting copyright infringements.

From the perspective of legal certainty theory, this situation creates uncertainty in law enforcement, as there is inconsistency between the expanded norm of Article 10 of the Copyright Law and the unchanged provision of Article 114 on criminal sanctions. Without explicit clarification on criminal sanctions applicable to UGC-based digital service providers, legal enforcement may become ineffective and potentially unjust (Julyano & Sulistyawan, 2019).

Therefore, the government must revise the wording of Article 10 of the Copyright Law to reflect the Constitutional Court's ruling and expand the meaning of Article 114 of the Copyright Law to align with the revised norm in Article 10. This adjustment is crucial to ensure that law enforcement is not hindered by legal loopholes, particularly in protecting copyrighted works such as songs used on UGC-based digital platforms, and to serve as a preventive measure to control the use and dissemination of copyrighted works in society.

3.3. The Liability Of User-Generated Content-Based Digital Service Platforms for Copyright Infringement Following Constitutional Court Decision No. 84/PUU-XXI/2023

Following the Constitutional Court's decision, User-Generated Content (UGC)-based platform providers must reassess their current policies and content moderation mechanisms. The ruling emphasizes that digital platforms bear

greater responsibility to proactively prevent copyright infringements. In this regard, platforms are expected to adopt more advanced content detection and filtering systems to identify potential infringements before content is published. Additionally, platforms may need to accelerate their responses to takedown requests and strengthen cooperation with authorities and copyright holders. This decision has a significant impact on the operational practices of UGC platforms and highlights the importance of legal compliance and ongoing regulatory adherence in an evolving digital ecosystem (Gema et al., 2024).

Constitutional Court Decision No. 84/PUU-XXI/2023 implicitly requires digital service platforms based on UGC to review and revise their content moderation policies and systems. Content moderation itself is a process of screening and supervising user-uploaded content to ensure compliance with legal provisions, including copyright laws. Thus, preventive measures are crucial steps that UGC platforms must take to avoid copyright infringement before it arises.

Several preventive measures that can be implemented by UGC platforms include:

1. Early Detection of Copyright-Infringing Content

Digital platforms are obliged to actively identify potential copyright-infringing content by utilizing technology, including Artificial Intelligence (AI). This technology can scan various types of content such as images, videos, music, and text. As noted by Prof. Dr. Ahmad M. Ramli, Professor of Cyberlaw and Intellectual Property at Padjadjaran University, the use of AI and increasingly sophisticated algorithms enables platforms to detect problematic content from an early stage. This technology requires platforms to adopt a proactive rather than passive role, preventing copyright infringement without waiting for reports from rights holders. For instance, YouTube, as a UGC platform, has developed tools such as Copyright Match Tool (CMT) and Content ID, which effectively detect and manage copyright-infringing content. These innovations help protect the rights and interests of creators (Argawati, 2024).

2. Establishing Clear Copyright Policies

Platforms must establish clear, firm, and understandable guidelines regarding the prohibition of copyright infringement, and provide warnings or education to users on the importance of respecting copyright. These policies are usually stipulated in the Terms of Service, emphasizing that all uploaded content must either belong to the user or be used with proper authorization from the copyright owner. Consequently, any content published on the platform must obtain approval from the creator or copyright holder, ensuring the respect of creators' rights.

3. Cooperation through Licensing Agreements with Copyright Owners

Digital platforms may enter into licensing agreements with copyright owners to ensure that content containing copyrighted works can be legally used by platform users. A license is a written agreement that grants official permission for the use of a work under specific conditions, such as royalty payments and time limitations (Sellyta Hadianida et al., 2024).

This is in line with Article 80 paragraph (1) of the Copyright Law, which stipulates that a license must be in written form. Licensing agreements allow creators to control the use of their works and receive economic benefits in the form of royalties — compensation for the exercise of economic rights over a work, which will be received by the creator or copyright holder (Modami & Rahaditya, 2024). For stronger legal force, licensing agreements can be incorporated into notarial deeds, which serve as official and legally binding evidence.

One notable example of such licensing is the agreement between TikTok (a UGC platform) and Sony Music Entertainment, granting TikTok a license to Sony Music's entire song catalog. This enhances the music collection available on the platform (Sudradjat et al., 2023), allowing TikTok users to legally use these songs in their content. This agreement is mutually beneficial, both for TikTok as a digital platform and Sony Music Entertainment as the copyright owner.

Conclusions and Recommendations

Constitutional Court Decision No. 84/PUU-XXI/2023 appears to impose stricter legal responsibilities on UGC-based digital service platforms, particularly regarding content that infringes copyright. The decision expands the interpretation of Article 10 of the Copyright Law, establishing that UGC-based digital platform providers can be held legally accountable if infringing content is found on their platforms.

This ruling affirms that digital platforms bear a greater obligation to proactively prevent copyright infringements. In this context, platforms are expected to adopt more sophisticated content detection and filtering systems to identify potential infringements before content is published. Additionally, platforms are required to accelerate their responses to takedown requests and enhance collaboration with copyright holders. Thus, the Constitutional Court's decision emphasizes that UGC platforms should not merely serve as spaces for content sharing but must also assume responsibility for respecting and safeguarding intellectual property rights.

References

- Argawati, U. (2024). Ahli: "Platform Digital" Wajib Deteksi Konten Langgar Hak Cipta. In *Mahkamah Konstitusi Republik Indonesia*.
- Atmoko, D., Cendhayanie, R. A., Dirgantini, M. K., & Purbowati, L. (2023). *Hak Kekayaan Intelektual*. Literasi Nusantara Abadi.
- Badru Jaman, U., Ratna Putri, G., & Azzahra Anzani, T. (2021). Urgensi Perlindungan Hukum Terhadap Hak Cipta Karya Digital. *Jurnal Rechten: Riset Hukum Dan Hak Asasi Manusia*, 3, 9–7.
- Djumahana, M., & Djubaedillah, R. (2003). *Hak Milik Intelektual Sejarah, Teori, dan Prakteknya Di Indonesia*. Citra Aditya Bakti.
- Ernatudera, W., Alam, A. S., Wijaya, A. U., & Raya Benowo, J. (2023). Tinjauan Yuridis Perlindungan Hak Moral Pencipta Berdasarkan Undang-Undang No. 28 Tahun 2014. *Jurnal Ilmu Hukum Wijaya Putra*, 1, 189–202.
- Gautama, V. A. (2022). User Generated Content pada Tiktok dan Penggunaannya di Kalangan Muda. *Jurnal Ilmu Sosial Dan Pendidikan (JISIP)*, 6(4), 2394–2406.
- Hadjon, M. P. (2007). *Perlindungan Hukum Bagi Rakyat Indonesia*. Bina Ilmu.
- Ibrahim, J. (2006). *Teori dan Metodologi Penelitian Hukum Normatif*. Bayumedia Publishing.
- Ikesha Pieter, A., Safiranita, T., & Ratna Permata, R. (2024). Tanggung Jawab Platform TikTok sebagai Layanan Over The Top terhadap Konten Pelanggaran Hak Cipta berdasarkan Hukum Positif di Indonesia. *COMSERVA: Jurnal Penelitian Dan Pengabdian Masyarakat*, 3(12), 4878–4889. <https://doi.org/10.59141/comserva.v3i12.1274>
- Julyano, M., & Sulistyawan, A. Y. (2019). Pemahaman Terhadap Asas Kepastian Hukum Melalui Konstruksi Penalaran Positivisme Hukum. *Jurnal Crepido*, 07(01), 13–22. <https://ejournal2.undip.ac.id/index.php/crepido/>
- Lilla, M., & Tropova, M.-A. (2018). Safe harbours in deep waters: a new emerging liability regime for Internet intermediaries in the Digital Single Market. *International Journal of Law and Information Technology*, 26, 294–310. <https://ssrn.com/abstract=3221520>
- Marzuki, P. M. (2006). *Penelitian Hukum*. Kencana Prenada Media Group.
- Modami, B. J., & Rahaditya, R. (2024). Peran Sertifikat Hak Cipta dan Lisensi Dalam Menjamin Kepastian Hukum Pemegang Hak Cipta Atas Karyanya. *Jurnal Ilmu Hukum, Humaniora Dan Politik (JIHHP)*, 4(4), 1008–1013. <https://doi.org/10.38035/jihhp.v4i4>
- Muhaimin. (2020). *Metode Penelitian Hukum*. Mataram University Press.
- Munandar, H., & Sitanggang, S. (2008). *Mengenal HAKI Hak Kekayaan Intelektual*. Erlangga.
- Noviriska. (2022). Perlindungan Hak Kekayaan Intelektual Terhadap Pelaku Ekonomi Kreatif Berdasarkan Undang-

- Undang Hak Kekayaan Intelektual Nomor 28 Tahun 2014 Tentang Hak Cipta. *Jurnal Ilmiah Publika*, 2, 298–306.
- Nurusyifa, D. (2023). Prinsip Deklaratif Dalam Regulasi Hak Cipta Di Indonesia. *Unes Law Review*, 6(2), 6361–6367. <https://doi.org/10.31933/unesrev.v6i2>
- Sellyta Hadianida, N., Safiranita, T., & Permata, R. R. (2024). Media Hukum Indonesia (MHI) Perjanjian Lisensi dan Royalti Sebagai Wujud Pelindungan Hak Cipta Dalam Waralaba Film. *Media Hukum Indonesia*, 2(4), 60–67. <https://doi.org/10.5281/zenodo.13909486>
- Sihite, S., Aritonang, A. M., Susanti Pasaribu, E., Riosa Siburian, P., Fany Manurung, M., & Gabriel Siahaan, P. (2025). Perlindungan Hak Cipta Film Dalam Pengelolaan Platform Digital Berbasis Teknologi User Generated Content (UGC). *JALAKOTEK: Journal of Accounting Law Communication and Technology*, 2(1), 638–647.
- Sihombing, A. K., Permata, R. R., & Ramli, T. S. (2021). Comparison of Digital Copyright Protection on Over the Top (OTT) Streaming Content Media in Indonesia and the United States. *Padjadjaran Jurnal Ilmu Hukum*, 8(2), 183–212. <https://doi.org/10.22304/pjih.v8n2.a2>
- Simangunsong, H. L., Santoso, B., Doramia, A., Program, L., & Kenotariatan, S. M. (2020). PERLINDUNGAN HAK CIPTA TERHADAP PEMBAJAKAN KARYA SASTRA NOVEL VERSI E-BOOK DI TOKOPEDIA. *Notarius*, 13(1), 442–454.
- Soekanto, S., & Mamudji, S. (2014). *Penelitian Hukum Normatif*. Radja Grafindo Persada.
- Soelistyo, H. (2011). *Hak Cipta Tanpa Hak Moral*. Raja Grafindo Persada.