



Unlawful Acts as a Result of Payment of Compensation Through Royalty Rights Perspective of Law Number 28 Year 2014 Copyright

Solehah Dhara Ad'ha Br Sianipar^{1*}, Muhammad Yadi Harahap²

State Islamic University of North Sumatra, Medan, Indonesia

Email: Dharasnpr22@gmail.com¹, Mhdyadiharahap@uinsu.ac.id²

Abstract - Human intellectual property in copyrighted or artistic works. Musicians' copyright rights include payments and dispute settlement for unlicensed use of musical works. This study examines music work copyright royalties in light of Law No. 28 of 2014. musical works under Copyright Law No. 28 of 2014. This study seeks to understand how the law governs the payment of royalties to music producers and protects and compensates them. This study also examines Decision No. 122/PK/Pdt.Sus-HKI/2015/PN.Niaga.Jkt. Pst, a Royalty Payment Dispute. In the case of Dispute over Royalty Payments on the Copyright License of Inul Vizta Karaoke VS Yayasan Karya Cipta Indonesia (YKCI), PT. Vizta Pratama Inul Vizta Karaoke Manado was ordered to pay Rp15,840,000.00 to YKCI. The juridical research method normative research method is used to examine the interpretation and execution of the law in the context of royalty payments for copyrighted musical compositions. The outcome This study should help parties understand their rights and responsibilities in musical copyright and suggest ways to strengthen copyright protection. And also expected to increase knowledge for readers and provide awareness for the Indonesian people to better appreciate song or music creators by paying royalties or music copyright. song or music by paying royalties or no longer pirating, mimicking, fabricating, or recognising others' copyrights as his own. Copyright or license holder of creation.

Keywords: Compensation, Royalty, Copyright, Musical Works, Law No. 8 Year 2014.

I. INTRODUCTION

Every person with the power of thinking and intelligence to create works of art, science, and technology should be honoured for a copyrighted work. Today's fast technological growth has influenced intellectual property rights. IP is a thing that has no form resulting from human intellectual effort manifested in copyrighted works or discovered works. According to Law Number 28 of 2014, copyright holders, notably music artists, face new challenges. Protected songs and music provide copyright owners the economic right to do as stated in HC Act Article 9 paragraph (1). Hotels, discotheques, restaurants, radio and television, karaoke, and other commercial users of songs must pay royalties to the copyright holder. Royalties may be used to compensate for a creation, including rights to music. Copyright royalties are paid to songwriters and copyright holders to recognise and compensate them for the usage of their songs (Santy dkk., 2021). Authors or copyright holders are entitled to royalties (Talahatu dkk., 2023). Public and commercial music users are included. However, many copyright users do not pay royalties (Zuhdi, 2023). Therefore, legal protection is needed to identify and resolve conflicts over the use of musical works without payment. Law No. 28 of 2014 protects copyright. The declarative principle instantly grants the author copyright when a work is

realised in a concrete form without decreasing limitations according to laws and regulations, including songs and music (Tirtakoesoemah & Arafat, 2020). This law protects music copyright and royalty payments.

Beautiful music is expensive to make. The writer needs a lot of time, effort, and thought, and the producer has to build a good recording studio. Before heading to the studio, the crew must unleash their creative abilities. This highlights how difficult and strenuous the task is for all parties involved in the creation of copyrighted content (Kurniawan dkk., 2024). Creators and copyright holders need legal protection. For economic rights lost, artists, copyright holders, and Related Rights holders or their successors are entitled to compensation (Situmeang & Kusmayanti, 2020). Royalties show respect for the efforts and abilities of authors and copyright holders and motivate them to create new works or projects (Talahatu dkk., 2023). Government Regulation No. 56 of 2021 on Royalty Management of Copyrighted Songs and/or Music mandates royalties (Santy dkk., 2021). President Joko Widodo signed it March 30, 2021. Artists and rights holders are undervalued without payment. Creative output will cease (Tirtakoesoemah & Arafat, 2020).

According to Government Regulation No. 56 of 2021, "Everyone can make commercial use of songs and/or music in the form of commercial public services by paying royalties to creators, copyright holders, and/or related rights owners through LMKN (National Collective Management Institution)" (Kurniawan dkk., 2024). In a broader context, the government is also trying to deal with illegal downloads which are violations of copyrighted musical works and songs through the internet media (Situmeang & Kusmayanti, 2020). In this context, royalty payments are important as a form of compensation or compensation to copyright owners whose works are used by others (Nugroho & NP, 2020).

Research (Kurniawan dkk., 2024) studied musician legal protection. The study addressed royalty payments and how to handle complaints about music usage without royalties. His investigation showed that exclusive rights are still misused. The government protects against copyrighted music with user-agreed royalty rates via LMKN. You may resolve disputes via litigation or non-litigation.

Indonesia has a high piracy rate, so copyright protection, especially for music, is very important (Ernatudera dkk., 2023). Copyright infringement is embedded in Indonesian culture (Nugroho & NP, 2019). Decision 122 PK/Pdt.Sus-HKI/2015 concerns music royalties for unauthorised use (Al Ghani, 2022). On October 19, 2016, Yayasan Karya Cipta Indonesia (KCI) and PT Vizta Pratama Inul Vizta Karaoke Manado, which no longer has a karaoke business licence but is still operating and without paying royalties, got (Rahmad & Hadi, 2023). KCI and PT Vizta Pratama Inul Vizta Karaoke Manado sued each other for intellectual property rights at the Central Jakarta District Court's Commercial Court. Commercial Court of Central Jakarta District Court handled bankruptcy, PKPU, and IP issues. The Central Jakarta District Court Commercial Court decided these business cases in 2016–2021:

Table 1 Commercial Cases in 2016-2021

Case type	Log-in	Decided	Average Settlement (%)
Principality	422	304	83,65 %
PKPU	1920	1401	83,54 %
HAKI	514	323	67,55 %

Source: <https://putusan3.mahkamahagung.go.id/>

Of the types of cases resolved by the Central Jakarta District Court, PKPU cases were the most common with a total of 1920 (Rotinsulu, 2020). The IPR case came second with a total of 514. For more details, the author will detail the IPR cases resolved through the commercial court. Commercial Court of Central Jakarta District Court decided the following intellectual property rights issues in 2020–2023:

Table 2 Intellectual Property Rights Cases in 2020-2023

Year	Login	Dropout	Remaining	Average Settlement (%)
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2020	72	61	11	84,72 %
2021	86	81	5	94,18 %
2022	122	122	-	100 %
2023	123	110	13	89,43 %

Source: <https://putusan3.mahkamahagung.go.id/>

Copyright Law: Examines the provisions of Law No. 28/2014 on remuneration and royalties for musical works (Namira, 2023). Explains copyright, exclusive rights, and royalty payments. Copyright in the Music Industry: Examines copyright's function in preserving copyright holders' economic rights, royalties' influence on artists' income, and royalty payments as music appreciation. Indemnification in the Copyright Context: Explains the concept of damages in copyright law, both in the form of material and immaterial losses. Discusses how damages can be awarded as compensation for copyright infringement, including in the context of royalty payments on musical works.

(Namira, 2023) researched musician legal protection. The study examined the implementation of Copyright Law Number 28 of 2014 and legal remedies for composers who do not get economic rights. His research found that Law Number 28 of 2014 on Copyright is still poorly implemented because many songwriters do not receive royalties from their songs, so many take legal action to get them. Socialisation of composers and entertainment venue owners is needed to make this Regulation simpler to execute and ensure justice for songwriters. Royalty Payment System: Analyzes the royalty payment system in the music industry, including the roles and functions of copyright management collectives, license agreements, and royalty management. Covers the role of the Copyright Management Agency (CMA) and other collective management organizations (Rachmat, 2023).

The research (Syahputra dkk., 2022) research are comparable and different. Normative legal research will be utilised to examine copyright royalty payments under Law Number 28 of 2014. This study discusses legal protection for musicians in the context of copyright royalties under Law Number 28 of 2014 concerning Copyright and dispute resolution against the use of song works without royalties, while the author's research focusses on copyright royalties and disputes over copyright emergence. According to research from (Zuhdi, 2023) This normative juridical study addresses economic rights under the Copyright Law and Government Regulation No. 56 of 2021 on Management of Copyright Royalties on Songs and Musical Music from a Maqashid Syariah perspective. We study PP Number 56 of 2021 on Copyright Management of Songs and Music, while the author studies Law Number 28 of 2014 on Copyright (Al Ghani, 2022) found similarities and differences between this research and the author's research. Both mention copyright royalties on musical compositions, while the author's study focuses on lawsuits over unauthorized music playback. Based on the above background and existing research, the Commercial Court at the Central Jakarta District Court decides Intellectual Property Rights (IPR) cases every year and continues to experience changes and increases. Every year, intellectual property rights lawsuits increase

II. METHOD

A normative juridical approach is applied in this research process. According to (Rais, 2023) normative juridical is a legal research approach that compares laws and regulations with the legal issues under study. Legal researchers use literature reviews to evaluate and assess laws such as Copyright Law No. 28 of 2014. This research method collects data from laws, regulations, government regulations, court decisions, and research results, as well as journals containing the writings and opinions of scholars and experts, to analyze how the law applies to the payment of copyright royalties on musical works. In addition, this research may also involve case study analysis to understand how the law is applied in practice and how redress can be provided through royalty payments. Descriptive analytical research is the one to be applied here. Descriptive analytical involves characterising the relevant laws and rules connected with legal theories and the application of positive law on the issue. Principal legal material is Law Number 28 of 2014 concerning Copyright, the General Book of Civil Law and

Government Regulation of the Republic of Indonesia Number 56 of 2021 concerning Management of Royalties for Copyright of Songs and / or Music and secondary legal materials, namely consisting of textbooks containing writings and opinions of scholars / experts, research results, seminar results, journals related to the problems studied. Using qualitative analytical approaches and non-statistical, non-mathematical data analysis that relates to the legal standards specified in Law No. 28 of 2014, data analysis techniques are used.

III. RESULT AND DISCUSSION

1. Arrangement of compensation through the payment of royalties for copyright on musical works in Law No. 28 Year 2014 on Copyright

Article 1 number 1 of the Copyright Law defines copyright as the creator's exclusive right that emerges naturally based on the declarative principle once a work is realised in a physical form without decreasing or restricting it. Music managers and copyright holders get royalties for enabling users to cover their tracks (Handiwiyanto & Dewanto, 2020). A contract entitles the creator to royalties when their work is used. A license is needed to receive royalties from others' usage of the creator's work (Kilanta, 2017). A license is granted to someone who wants to make commercial use of a work. Copyright is economically intangible. The intangible wealth of a copyright holder is its economic value (Saputra dkk., 2022). Copyright allows content producers to recreate their music and songs.

Article 1365 of the Indonesian Civil Code defines illegal activities. Such a criminal must pay damages. The copyright law offers damages for infringement. Indonesian Copyright Law 28 of 2014 (Aeni, 2024), provides compensation to artists and copyright holders for copyright infringement. Articles 113-115 of the Copyright Act provide for damages for copyright infringement. Key legal remedy points: (1) Section 113 allows creators or copyright holders to claim infringement damages. (2). Section 114 states that a copyright holder can suffer direct and indirect losses. (3). Article 115: The court must consider the market value of the product or service made from the copyrighted work and the copyright holder's losses when calculating damages.

Thus, the Copyright Act protects creators by allowing them to seek compensation for copyright infringement. This compensation depends on the loss and value of the copyrighted work (Syahputra dkk., 2022). Article 1 paragraph 21 of Law Number 28 of 2014 on Copyright provides that royalties compensate the author or owner of economic rights to a work or connected product. Royalties provide creators and associated rights holders economic rights. Royalties honour artists and rights holders and encourage new work. Creators and copyright holders are undervalued without payment. Creators who feel undervalued cease producing. Song and music producers have economic rights to their creations, thus commercial use requires authorisation. For commercial usage, the user must pay royalties to the creator and copyright holder.

According to (Esti & Kusumarani, 2023) copyright infringement includes (1) Unauthorized Use: Using copyrighted material without permission. (2) Plagiarism: Copying someone else's work without giving credit. (3). Forgery: Taking someone else's work without permission. (4) Unauthorized Modification: Changing a work without permission. (5). Piracy: Copying, distributing, or selling a work without permission. (6) Unauthorized Broadcasting: Broadcasting copyrighted material without permission. Unauthorized Commercial Use: Using a work commercially without permission or license. (8) Counterfeiting: Taking the work of another person. (9). violation of license terms: Violating the terms of the copyright owner's license (Assyifa dkk., 2021).

Indonesian Copyright Law No. 8 of 2014 protects human intellectual works like songs and music (Adela & Chairunisa, 2022). Copyright offenders face jail time and fines. Because song and music producers have economic rights to their work, they must ask permission before using it commercially. For commercial usage, the user must pay royalties to the inventor. Indonesian music workers are paid by Government Regulation (PP) Number 56 of 2021 on the Management of Copyright Royalties on Songs and/or Music (Chosyali, 2019). Copyright holders must be paid by commercial and public music users under this law. Second,

copyright law informs artists about royalty payments and music infringement disputes. Thirdly, the withdrawal of royalties, where this rule defines the obligation to remove payments. If any party uses a musical composition without paying royalties, then compensation can be enforced.

2. Judges' consideration in determining compensation for payment of royalty rights

One of the karaokes in Indonesia, Inul Vista Karaoke, in Manado, infringed copyright and paid royalties. The family-run Inul Vista Karaoke is owned by The Vizta Pratama Company. Indonesian Cipta Works Foundation sued The Vizta Pratama Company Inul Vista Karaoke in Manado for copyright infringement in 2013 for not paying fees. Another difficulty is that PT Vizta Pratama's license has expired, yet Inul Vista Karaoke in Manado continues to operate. These tactics violate the economic rights of authors, according to the Indonesian Copyright Works Foundation. In Makassar District Court, Indonesian Cipta Works Foundation sued The Vizta Pratama Company Manado. One of the main rulings of the Panel of Judges on March 28, 2013 was that the Defendant had committed copyright infringement of songs/music by performing without the Plaintiff's permission, which constituted an unlawful act (PMH) and ordered it to pay Rp 15,480,000. The Vizta Pratama Company Inul filed an appeal against the verdict on March 31, 2013, and the Supreme Court granted it because Indonesian Cipta Works Foundation, a forum for "songwriters and musicians" to collect royalties for "performance" activities as referred to in Article 1 paragraph (5) of Law No. 19 of 2002 on Copyright, did not exist. Because the collection of royalties is unlawful, the KCI Foundation cannot sue. The Supreme Court annulled the decision of the Makassar Commercial Court dated March 28, 2013 No. 01/HKI/2012/PN Niaga Mks.

The Vizta Pratama Company Inul Vista Karaoke Manado was sued by Indonesian Cipta Works Foundation on September 4, 2015. The Supreme Court granted the petition because the *Judex Juris* held that the Petitioner as a legal entity that conducts business activities collectively is a profit-seeking institution, thus violating Article 1 of Law Number 28 of 2004 concerning Foundations. When the collection of royalties provides benefits to the Creator/Creator, then no profit is sought. After the Supreme Court granted the application, Indonesian Cipta Works Foundation sued The Vizta Pratama Company Inul Vista Karaoke Manado through a Judicial Review (PK) on September 4, 2015. The Supreme Court granted the application because the *Judex Juris* stated that the Applicant as a collective management legal entity is a profit-seeking institution in violation of Article 1 of Law Number 28 of 2004 concerning Foundations. Since the Music Creator/Creators benefit from royalties and the Petitioner is a collective management institution, the Supreme Court granted the petition for review of Indonesian Cipta Works Foundation and annulled the Supreme Court Decision No. 392 K/Pdt.Sus-HKI/2013 dated March 31, 2015.

IV. CONCLUSION

A creator or rights holder earns royalties for economic or related product rights. Royalties support artists' economic rights. Royalties honour Creators and Related Rights Holders and encourage them to develop new works. Without remuneration, artists and copyright holders are underpaid. Unappreciated creators will quit creating. Artists' copyright rights are protected by Law No. 28 of 2014. Copyright holders must be paid by anybody who utilises songs or music commercially or in public services under Government Regulation (PP) No. 56 of 2021. This study should assist Indonesian's respect song and music producers by paying royalties and not pirating, copying, misrepresenting, or recognising others' copyrighted works or licensees' works. The 2014 Copyright Law No. 28 protects the creator's rights. Use copyrighted works with the creator's name to respect their capital rights. Authors' moral rights must be respected when students quote or paraphrase copyrighted work. To protect artists' moral rights, Law No. 28 of 2014 violators should be prosecuted for damages. Artistic moral rights abuses demand stricter national and regional legislation.

Although in 2021 there is PP No. 56 of 2021 but it is not yet effective, researchers found that artists who own copyrighted musical compositions have not been completely

protected by laws including economic rights and moral rights even. Those without copyright understanding do not search further, for instance if they want to cover songs on the YouTube site; so, the artists suffer ultimately. The relevant government has to have a genuine responsibility for being more engaged in overseeing and providing actual protection. In the framework of songs performed without permission, dispute resolution for rights infringement may be pursued in two ways: either out-of-court or in-court settlement. Arbitration, mediation, negotiation, conciliation are part of out-of-court conflict resolution. Although business court may help to resolve conflicts in court. Article 1365 of the Civil Code shows how copyright law is enforced: any illegal activity that causes damage to others results in obligation for the guilty party. helps the individual who causes the loss by means of his error to offset it.

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