

Synchronization In Enforcement Of The Transportation Of Online Motorcycle Taxi Passengers (Ojek Online)

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Abstract

Of the several regulatory products that have been enacted there are overlaps and even there are asynchronies between the regulations with one another. This can be seen from the enactment of the Minister of Transportation Regulation No. PM 18 in 2020 and Jakarta Governor Regulation No 33 in 2020. In the governor regulation, large-scale social limitation is regulated. According to the governor's regulation, one of the restricted sectors is the two-wheeled vehicle transportation sector where passenger transportation by motorcycle taxi is only applied to goods. On the contrary in the regulation, online motorbike transportation can be for passengers as long as they follow the health protocol. This has caused confusion in the community and also for law enforcement officials.

Keywords: *Synchronization, Disharmony, inconsistency, transportation*

Abstrak

Dari beberapa produk peraturan yang sudah diberlakukan saat bencana terdapat tumpang tindih bahkan terdapat ketidaksinkronan antara peraturan satu dengan yang lain. Hal ini dapat dilihat dari diberlakukannya Peraturan Menteri Perhubungan No. PM 18 tahun 2020 dan Peraturan Gubernur Jakarta No 33 tahun 2020. Menurut peraturan gubernur, salah satu sektor yang dibatasi saat Pembatasan Sosial Berskala Besar (PSBB) adalah sektor transportasi kendaraan roda dua dimana pengangkutan penumpang dengan motorcycle taxi hanya diberlakukan untuk barang saja. Sebaliknya dalam permenhub, angkutan ojek online boleh untuk penumpang asalkan mengikuti protokol kesehatan. Hal ini menimbulkan kebingungan di masyarakat dan juga bagi aparat penegak hukum.

Kata Kunci: *Sinkronisasi, Disharmonisasi, Inkonsistensi, Transportasi*

A. Introduction

Covid19 pandemic that hits almost all countries including Indonesia caused a lot of devastating impact and loss. The coronavirus outbreak led into major sectors such as social and economy. Due to the policies to do social and physical

distancing, it affects the interpersonal relationships between people and incapability of people to carry out daily activities as usual. As an example, people are not capable to perform worship activities in congregation such as Friday prayer, church service, etc. On the other hand, the coronavirus outbreak had affected the global economy sector. The coronavirus outbreak led the government of many countries to impose restrictions on nonessential travel to countries affected by COVID-19, indefinitely suspending tourism travel, work visas and immigrant visas. Some countries placed a complete travel ban on all forms of inward or outward travel, shutting down all airports in the country. Moreover, restaurant businesses have been affected during the pandemic mainly through the government-announced “stay at home” and social distancing movement restriction imposed by government in many countries.¹ In Indonesia, the coronavirus outbreak caused many people to lose their jobs and income.

One of the economic sectors that mostly affected by this pandemic is the transportation sector, which is the online motorcycle taxi (ojek online). Implementation of Large-Scale Social Limitation (PSBB) in Indonesia, especially in Jakarta, many drivers had suffered losses due to the prohibition to carry passengers. In 9 April 2020, the regional government of the Special Capital Region of Jakarta had issued Jakarta Governor Regulation No. 33 Year 2020 regarding Implementation of Large-scale Social Limitation in handling COVID-19 in the Special Capital Region of Jakarta. This regulation includes the scope of the regulation which was stated in article 4 such as: a. The implementation of Large-Scale Social Limitation, b. Rights, needs, and fulfillment of basic needs of the citizens during the large-scale social limitation, c. Resource management for COVID-19, d. Monitoring, evaluation and reporting; and e. Sanction.

Since the implementation of Large Scale Social Limitation, many drivers, especially online motorcycle taxi drives, had suffered terrible losses due to the prohibition to carry passengers and only allowed to deliver goods. This policy

¹ Ozili, Peterson, Arun, Thankom, “Spillover of COVID-19: impact on the Global Economy, SSRN Electronic Journal, November, 2020.

caused the decrease in their income. This condition becomes different when the Minister of Transportation issued the Minister of Transportation Regulation No. PM 18/2020 which allows online motorcycle taxi drivers to carry passengers. From the community's point of view, there is confusion when people want to use an online motorcycle taxi for daily activities such as going to the market, to the hospital, or other activities that involve personal and crucial interests. On the contrary, from the point of view of law enforcement officials, the enactment of the two regulations raises hesitation in enforcing the law. The hesitation in this law enforcement raises the inconsistency of law that can cause not only the community distrust but also ineffectiveness in law enforcement.

B. Discussion

1. Synchronization of Regulations in Implementing Large Scale Social Limitation

In general, legal synchronization is the alignment and harmonization of various laws and regulations that are related to existing and under-existing laws and regulations that regulate a particular field. The purpose of synchronization activities is so that the substance is regulated in legislation products do not overlap, complement each other, are interrelated, and the lower the type of regulation, the more detailed and operational load material. The purpose of synchronization activities is to realize the regulatory basis of a particular field that can provide adequate legal certainty for the operation of certain fields efficiently and effectively.²

The synchronization of laws and regulations can be done in two ways, which are:

a. Vertical synchronization

Vertical synchronization is synchronizing laws and regulations with other laws and regulations in different hierarchy.

² <https://kendari.bpk.go.id/wp-content/uploads/2018/04/Sinkronisasi-Harmonisasi.pdf>, accessed in May 21. 2020 4:25 PM

Synchronization is done by seeing whether a statutory regulations that apply in a particular field do not conflict with one another. The hierarchy of law is stated in article 7 of Law No.12/2011 concerning The Formation of Statutory Regulations, stipulates the types and hierarchy of laws and regulations which consist of:

- 1) Constitution of 1945;
- 2) Decree of People's consultative Assembly;
- 3) Government Act/Regulation in Lieu of Law
- 4) Government's Regulation
- 5) Presidential Regulation
- 6) Provincial Regulation
- 7) Regency/City Regional Regulation

Beside from paying attention to the hierarchy of laws and regulations, in vertical synchronization, the government have to take into account the chronological year and number of stipulation of regulation concerned. The aim of vertical synchronization is to see if the existing regulation or law not conflicting with one another if it is seen from vertical perspective or the hierarchy of law.

b. Horizontal Synchronization

Horizontal Synchronization is synchronization of laws and regulations with other laws and regulations in the same hierarchy. Horizontal synchronization is done by looking at various regulations the same law and regulate the same or related fields. Horizontal synchronization must also be done chronologically, i.e. in accordance with the time series of the laws and regulations concerned. Horizontal Synchronization aims to uncover the reality to the extent which certain laws are aligned horizontally, having the harmony between equal legislation regarding the same field.

Basically, the purpose of issuing of Jakarta Governor's regulation No.33/2020 regarding Implementation of Large-scale Social Limitation in

handling COVID-19 in the Special Capital Region of Jakarta is as a policy rules (*beleidsregel*) from the implementation of Government's Regulation and the Minister of Health Regulation. The authority of Jakarta's governor is a delegation of authority from government to regional government in a form of deconcentration. The basic of the authority of regional government to issue the regulation and police rule refers to Law No.23/2014 regarding the Regional Autonomy. In article 1 letter 9 of Law No. 23/2014, "*Deconcentration is the delegation of part of Government Affairs which is the authority of the Central Government to the governor as the representative of the Central Government, to vertical agencies in certain areas, and / or to the governor and regent / mayor as the person in charge of general government affairs.*".

In order to deconcentrate the government system, the Jakarta Government also implement the decentralization. Decentralization means that the authority to regulate and manage government affairs in the region both in territorial and functional units. That is, lower government units were handed over and allowed to regulate themselves as government affairs³

2. Legal Certainty in the application of Large Scale Social Limitation

In every legal norm formation, there is a mission or goal to be achieved through that norm. Talking about the purpose of the law, means, we are invited to discuss what the basic values of law are. In Roscoe Pound's perspective, law is used as a tool to renew the society (law as social engineering) aimed at protecting personal interests, public interests and social interests. In connection with the enactment of Jakarta Governor Regulation No.33 /2020, the author argue that the regulation was made with the intent to protect the personal interests of the citizens of Jakarta while protecting the public and social interests of COVID-19. Because, if no restrictions are made, especially in the transportation of application-based, two-wheeled vehicles, it is not impossible that the spread of coronavirus cannot be minimized. Because

³ Philipus Hadjon *et al.*, 2015, *Pengantar Hukum Administrasi Indonesia (Introduction to the Indonesian Administrative Law)*, Gadjah Mada University Press, Yogyakarta.

the spread of the virus not only through droplets, but also physical contact. The same objectives are also contained in the Ministry of Transportation, which also provides protection where in the Ministry of Transportation Regulation, requires that application-based, two-wheeled transportation (motorcycle taxi) can transport people on condition that it meets the health protocol. The form of state protection in this case the central government and regional governments is an embodiment of the existence of legal certainty.

Gustav Radburch stated that there are three objectives of the law that humans want to realize, specifically the legislators, namely justice, certainty, and expediency. Radburch's opinion is different from the opinion expressed by Franz Magnis-Suseno. According to Magnus Suseno, justice, certainty, and expediency are not legal objectives but are characteristics of the law. In connection with the issue of legal certainty, there are several opinions from legal experts regarding the definition and categories of legal certainty. According to Apeldoorn, legal certainty has two aspects or two aspects, the first is the problem of determining the law in concrete matters. That is, members of the community who seek justice can know what the law for specific matters is before he starts a case. Second, legal certainty is defined as legal security, namely protection for the parties from the arbitrariness of law enforcers⁴.

For the legal certainty of a rule or legal norm made by the authorities, in Hans Kelsen's perspective, a rule must be based on certain principles must be in accordance with the legal provisions therein above. Referring to Stufenbau theory, where the legal system is tiered, then the existing regulations below must not conflict with the existing regulations on it. This view was also approved by Hans Nawiasky. Thus, in order to provide legal certainty in the enforcement of large-scale social limitation, there should be no conflict between the Governor's Regulation and the Ministry of

⁴ Sidharta. 2006, *Moralitas Profesi Hukum (Suatu Tawaran Kerangka Berpikir)*, Refika Aditama, Jakarta. Page 82-83

Transportation Regulation. However, to say that the regulation is contrary to the Ministry of Transportation regulation must be examined from the issuance of the regulation whether it has been approved by the minister of health that the regulation is legal. Because in its formation refer to the Minister of Health Regulation.

In another view, legal certainty is realized in the form of legal products made by the authorities. According to John Austin, with his teachings which is the imperative school, said that the law is a product of the state authority which contains orders, sovereignty, obligations and sanctions. From what was conveyed by Austin, both ministerial and governor regulations, both of them were regulations made by state authorities aimed at ensuring legal certainty in handling COVID-19.

3. Implementation of General Principles of Good Governance in Forming Large Scale Social Limitation Regulations

In order to improve the quality of government administration, government bodies and / or officials in using authority must refer to the general principles of good governance and based on statutory provisions. To solve problems in the government administration, the regulations regarding the government administration are expected to be a solution in providing legal protection both for the citizens and government official. Therefore, it is important for the government to take a notice on making new regulations especially during this pandemic.

In article 5 of Law No. 30 / 2014 regarding Government Administration, it states:

“Government Administration is based on:

- a. The principle of legality;*
- b. the principle of protection of human rights; and*
- c. General Principles of Good Governance (AUPB).⁵”*

⁵ Undang-Undang Nomor 30 Tahun 2014 tentang Administrasi Pemerintahan (Lembaran Negara Tahun 2014 Nomor 292)

In making a regulation or decision, the government is required to conduct the law according to the principle of legality. The theory of Principle of Legality means that the law is clear, ascertainable and non-retrospective, but in practice this is not always possible⁶. It means that a regulation should be based on existing law while looking back on or dealing with past events or situations. Consequently, the government officials cannot do despotic actions by making an arbitrary decisions and the past events does not occurred. Moreover, a regulation must comply with the principle of protection of human rights. Which means that the applicable regulations do not violate the human rights of the people. Human rights is become part of people's life and part of the government's obligation to protect them. The government have to make sure that the human rights are taken into account during governmental processes such as policy-setting and decision-making.

Fundamentally, everyone has the right to get a decent job and has the freedom of employment. It is stipulated in article 23 of UDHR (Universal Declaration of Human Rights) which states:

- 1) *Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.*
- 2) *Everyone, without any discrimination, has the right to equal pay for equal work.*
- 3) *Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.*

⁶ <https://www.lawteacher.net/free-law-essays/administrative-law/the-government-and-the-principle-of-legality-administrative-law-essay.php> , accessed on May 17, 2020 10:40 PM

4) *Everyone has the right to form and to join trade unions for the protection of his interests.*⁷

The right to work is also contained in article 28 of 1945 Constitution which states that everyone has the right to work and get fair and appropriate treatment and reward in a work relationship.

The coronavirus outbreak caused people to lose their jobs and income due to the obligation to do large-scale social limitation. The aim of large-scale social limitation is to flatten the curve of the outbreak hence the transmission can be reduced and the number of patients does not increase. However, this large-scale social limitation gives a great impact to our lives, especially to those who are unable to do WFH (Work from Home). As an example, the online motorcycle taxi drivers are not capable to work normally due to the prohibition to carry passengers during the large-scale social limitation.

The enforcement of large-scale social limitation is contained in article 13 paragraph (1) of Minister of Health Regulation No. 9/2020 regarding Guidelines of Large Scale Social Limitation, which states:

“The implementation of large-scale social restrictions includes:

a. school and workplace entertainment;

b. restrictions on religious activities;

c. restrictions on activities in public places or facilities;

d. restrictions on social and cultural activities;

e. restrictions on modes of transportation; and

f. restrictions on other activities specifically related to

aspects

⁷ UN General Assembly. (1948). "Universal declaration of human rights" (217 [III] A). Paris. Retrieved from <http://www.un.org/en/universal-declaration-human-rights/>

defense and security.”⁸

One of the effort to implement the large-scale social limitation is by doing restrictions on modes of transportation. In 9 April 2020, the regional government of the Special Capital Region of Jakarta had issued Jakarta Governor Regulation No.33 /2020 regarding Implementation of Large-scale Social Limitation in handling COVID-19 in the Special Capital Region of Jakarta. The seventh section, article 18 contains the restrictions on the use of transportation modes for people and goods. All activities concerning the use of transportation modes, both people and goods, are stopped temporarily except for the fulfillment for basic needs and other activities that are allowed during the large-scale social limitation. In article 18 paragraph (6), it states “*Application-based, two-wheeled transportation is restricted to use only for the carriage of goods*”, which means that the online motorcycle taxi, or commonly known as *ojek online* is prohibited to carry out passengers during the large-scale social limitation. In order to support the existing policy, Grab and Gojek eliminated motorcycle taxi services in their application, for DKI Jakarta area. Nevertheless, for services other than two-wheeled transportation, such as Go Car and Grab Car is still available with health protocol requirements and keep implementing the physical and social distancing. Moreover, this policy is also contained in Minister of Health Regulation No. 9/2020 concerning Large-Scale Social Limitation (PSBB). In article 15, it is stated that freight forwarding services, including application-based, two-wheeled transportation facilities with restrictions only for transporting goods and not for passengers. The operational hour is also limited from 06.00 to 18.00. Although this regulation is enforced to reduce the transmission of coronavirus, in point of fact, this regulation had affected the

⁸ Peraturan Menteri Kesehatan No.9 Tahun 2020 tentang Pedoman Pembatasan Sosial Berskala Besar dalam Rangka Percepatan Penanganan Corona Virus Disease 2019 (COVID-19), retrieved from <https://peraturan.bpk.go.id/Home/Details/135220/permenkes-no-9-tahun-2020>

motorcycle taxi driver because it is considered to decrease their income, and even caused them to lose their job. However, the Minister of Transportation Regulation No. PM 18/2020 allows online motorcycle taxi drivers to carry passengers. In article 11 paragraph (1) letter (d), it states:

“In certain cases for the purpose of serving the interests of the community and for personal interests, motorbikes can transport passengers on the condition that they must meet the following health protocols:

- 1. Other activities that are permitted during Large-Scale Social Restrictions;*
- 2. Disinfecting vehicles and equipment before and after they are used;*
- 3. Using a mask and gloves; and*
- 4. Not driving if you are experiencing body temperature above normal or sick;”⁹*

The inconsistency between both regulations caused the implementation of Jakarta Governor Regulation No.33 /2020 regarding Implementation of Large-scale Social Limitation in handling COVID-19 in the Special Capital Region of Jakarta becomes obstructed considering the existence of health protocols is not enough to prevent the transmission of the coronavirus.

Referring to the case, Prof. Kuntjoro Purbopranoto in his book *“Beberapa Catatan Hukum Tata Pemerintahan dan Peradilan Administrasi Negara”*, classified the general principles of good governance, which presents 13 principles namely:

1. Principle of legal security (*asas kepastian hukum*)
2. Principle of proportionality

⁹ Peraturan Menteri Perhubungan No PM 18 Tahun 2020 tentang Pengendalian Transportasi dalam rangka Pencegahan Penyebaran Corona Virus Disease (COVID-19), retrieved from http://jdih.dephub.go.id/assets/uudocs/permen/2020/PM_18_TAHUN_2020.pdf

3. Principle of equality (*asas kesamaan*)
4. Principle of carefulness (*asas bertindak cermat*)
5. Principle of motivation
6. Principle of non-misuse of competence
7. Principle of fair play
8. Principle of reasonableness or prohibition of arbitrariness
9. Principle of meeting raised expectation
10. Principle of undoing the consequences of an annulled decision
11. Principle of protecting the personal way of life
12. Principle of wisdom (*sapientia*)
13. Principle of public services¹⁰

In making and implementing a regulation, indeed it must be based on these 13 principles, especially the principle of equality, principle of legal certainty, and principle of trust which become the material principle of good governance. These principles determine the contents from the decision that will be taken. Hence both Jakarta Governor Regulation No.33 /2020 and Minister of Transportation regulation No PM 18/2020 must be in accordance with the principles of good governance, especially the principle of equality, principle of legal certainty, and principle of trust. However, both regulations does not indicate the principle of legality since both regulations are conflict with each other. Therefore, the synchronization and harmonization of the regulations as explained in section 1 of the discussion are needed so that the principle of legality can be achieved.

4. Juridical Impact of Legislation that does not meet with The Principle of Good Governance

¹⁰ Purbopranoto, Kuntjoro, 1953, *Beberapa Catatan Hukum Tata Pemerintahan dan peradilan Administrasi Negara*, PT Soeroengan, Jakarta. Chapter 1 Paragraph (f) “Dasar-dasar/Asas-asas umum pemerintahan yang baik”

The inconsistency between Jakarta Governor Regulation No.33/2020 and Minister of Transportation Regulation No. PM 18/2020 resulting a disharmony in its implementation. This causes the apparatus to confuse the law enforcement. The disharmony in these regulations can lead to different interpretations in their implementation, the legal uncertainty, and legal dysfunction which can cause the law to not function properly due to its incapability to provide guidelines for the community, social control, dispute resolution, and as a means of social change. Moreover, the disharmony can cause the regulations not implemented effectively and efficiently.

To overcome the disharmony of laws and regulations, the following methods can be carried out by:

- a. Amending / revoking certain articles which is inconsistent or all articles of the relevant laws and regulations by the authorized institution.
- b. Submitting application for judicial review to the judiciary to Constitutional Court or Supreme Court (depending on the type of regulation). Judicial review of constitution or certain law is done by constitutional court, while the testing of statutory provisions under the law is done by the supreme court.
- c. Applying the principle of law/ legal doctrine as follows:

- 1) Lex superior derogat legem inferiori.

Higher-level statutory regulations rule out lower-level statutory regulations, except if the substance of higher-level legislation regulates matters which by law are determined to be the authority of lower-level statutory regulations.

- 2) Lex Specialis Derogat Legi Generalis

This principle implies that a specific regulation rule out the general regulation. There are several principles that

must be considered in the principle of Lex specialis derogat legi generalis:

(a) Provisions found in the rules of general law still apply, except those specifically regulated in these specific rules of law.

(b) The provisions of the lex specialis must be equal to the provisions of the lex generalis (statute with law).

(c) The provisions of the lex specialis must be in the same legal (regime) environment as the lex generalis. The Commercial Law Law and the Civil Law Law are both included in the civil legal environment.

3) Lex Posteriori Derogat Legi Priori

New regulation rules out the old regulation. The principle of the lex posteriori derogat legi priori requires the use of a new law.¹¹

The disharmony between Jakarta Governor Regulation No.33/2020 and Minister of Transportation Regulation No. PM 18/2020 can be solved by amending and revoking the regulation or certain articles. For the governor regulation, the Governor must report to the Minister of the Home Affairs (*Kementrian Dalam Negeri*) through the Secretary General of the Head of the Ministry of Home Affairs Legal Bureau regarding regional regulations, regional head regulations and provincial head's decrees which hinder bureaucracy and investment licensing by including Title, Chapter, Section, Paragraph, Article and Paragraph to be canceled. However, Ministerial Regulation as a delegated legislation regulation of a law in principle further regulates the material regulated in the law that delegates it. If the law has been revoked or replaced with a new law, it is very likely that the

¹¹ <http://ditjenpp.kemenkumham.go.id/htn-dan-puu/421-harmonisasi-peraturan-perundang-undangan.html> accessed in May 23, 2020 10:58 PM

substance of the Ministerial Regulation will become irrelevant or may even conflict with the new law. Moreover, This Ministerial Regulation may also be revoked by other Ministerial Regulations or higher statutory regulations (such as Government Regulations or Presidential Regulations) which are approved to revoke Ministerial Regulations from old laws. If there is a new ministerial regulation whose substance is the same as the old ministerial regulation, the old ministerial regulation does not apply based on the principle of *lex posteriori derogate legi generali*.

Besides the revocation and amendment of the regulation, the disharmony can be solved by examining the regulation with submission of material test towards the existing regulation. Article 24 A paragraph (1) of the 1945 Constitution states:

"The Supreme Court has the authority to adjudicate at the cassation level, examine the statutory regulations under the law against the law, and have other powers granted by law."

The procedure of material test towards the Regulation is written in article 31 A Law No. 3/2009 concerning Second Amendment to Law Number 14 of 1985 concerning the Supreme Court.

1. *Application for judicial review under the law against the law is submitted directly by the applicant or his attorney to the Supreme Court and made in writing in the Indonesian language*
2. *This application can only be made by parties who consider that their rights have been impaired by the enactment of laws and regulations under the law, namely:*
 - a. *individual Indonesian citizens;*
 - b. *customary law community unit as long as it is still alive and in accordance with community development and the*

principles of the Unitary State of the Republic of Indonesia as stipulated in the law; or

c. public legal entity or private legal entity.

3. *The application must contain at least:*

a. applicant's name and address;

b. a description of the subject that forms the basis of the application and clearly states that:

1) the material contained in paragraphs, articles, and / or parts of the laws and regulations under the law is considered contrary to the higher laws and regulations; and / or

2) the formation of laws and regulations does not meet the applicable provisions; and

c. the things requested to be disconnected¹²

In revoking and amending the regulation, it should be in accordance with the principle of law. The relevant regulation must be tested whether it is against the Pancasila, the 1945 Constitution, or the principles of the laws and regulations. Moreover, the existing regulation should not violate the principle of legality, principle of human rights and principle of good governance. Therefore, the material test plays an important role in evaluating and examining the regulation.

C. Conclusion

The synchronization of regulation is very necessary so that the one regulation does not conflict with the other regulation. The synchronization can be done vertically, which is done by synchronizing laws and regulations with other laws and regulations in different hierarchy and horizontally, by synchronizing the regulations in the same hierarchy. The absence of

¹² [Undang-Undang No. 3 Tahun 2009 tentang Perubahan Kedua Atas Undang-Undang Nomor 14 Tahun 1985 tentang Mahkamah Agung](https://www.hukumonline.com/pusatdata/detail/28864/nprt/1060/uu-no-3-tahun-2009-perubahan-kedua-atas-undang-undang-nomor-14-tahun-1985-tentang-mahkamah-agung) , retrieved from <https://www.hukumonline.com/pusatdata/detail/28864/nprt/1060/uu-no-3-tahun-2009-perubahan-kedua-atas-undang-undang-nomor-14-tahun-1985-tentang-mahkamah-agung>

synchronization between Jakarta Governor Regulation No.33/2020 and Minister of Transportation Regulation No. PM 18/2020 caused the disharmony in both regulations. This disharmony can be done by amending, revoking or submitting the material test by the authorized institution (Supreme Court and Constitutional Court). In order to improve the quality of government administration, government bodies and / or officials in using authority must refer to principle of legality, principle of human rights, and principle of good governance. Moreover, the regulation should not violate Pancasila, the 1945 Constitution, or the principles of the laws and regulations.

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<http://ditjenpp.kemenkumham.go.id/htn-dan-puu/421-harmonisasi-peraturan-perundang-undangan.html> accessed in May 23, 2020 10:58 PM

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