Optimizing the Role of LMKN in Managing Royalties for Songs and/or Music: A Comparative Study Between Indonesia and the United Kingdom

Setyo Nugraha[1] , Ridha Wahyuni[2]
Universitas Pembangunan Nasional 'Veteran' Jakarta, Indonesia
Email: 2210611448@mahasiswa.upnvj.ac.id* , wahyuniridha@upnvj.ac.id

ABSTRACT

The centralization of one-stop royalty management through the Lembaga Manajemen Kolektif Nasional (LMKN) in Indonesia has triggered structural polemics, ranging from bureaucratic ineffectiveness to a crisis of trust among songwriters. Although the government has issued Regulation of the Minister of Law Number 27 of 2025 to strengthen supervision, the institutional framework that positions the state as an active operator still fails to address the root problems. This study analyzes the optimization of LMKN's role in the national music royalty ecosystem through a comparative examination of the institutional model in the United Kingdom. The research employs a normative-juridical method with statutory and comparative legal approaches, examining Law Number 28 of 2014 concerning Copyright and Government Regulation Number 56 of 2021, juxtaposed with the Copyright, Designs and Patents Act 1988 (CDPA 1988) of the United Kingdom. The results reveal that Indonesia's state-centered model imposes a dual burden on LMKN as both regulator and operator. In contrast, the United Kingdom's market-based model proves more effective by delegating operational functions to private institutions and adjudication to the Copyright Tribunal. This study recommends transforming LMKN into an independent, quasi-judicial supervisory body akin to the Copyright Tribunal, focusing on tariff dispute resolution and transparency audits, while returning royalty collection to a regulated market mechanism.

KEYWORDS	*LMKN, Music Royalty, Copyright Tribunal, Legal Comparison, Copyright.*
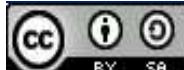
INTRODUCTION

The copyright royalty governance ecosystem in Indonesia is currently experiencing a malfunction due to the complexity of multidimensional structural challenges. The government's efforts to respond to the dynamics of the music industry through legislative reform—namely, through the promulgation of Law Number 28 of 2014 concerning Copyright (UUHC) and its derivative regulations, Government Regulation (PP) Number 56 of 2021—paradoxically accelerate the emergence of fundamental problems related to institutional design (institutional design contradiction). The core of the problem stems from the philosophical inconsistency in the UUHC; Article 87 introduces the concept of Collective Management Institutions (LMK), which is assumed to grow organically (bottom-up) from the initiative of rights holders, while Article 89 paragraph (1) contradictorily mandates the establishment of LMKN, which is centralistic and formed top-down by the state (Dirkareshza, 2025). The implementation of this ambiguous regulatory framework not only creates legal uncertainty and bureaucratic ineffectiveness but also triggers a substantial crisis of trust from songwriters in the managing authority (Rabbani, 2023).

This crisis of trust has manifested itself in various open disputes between creators and management institutions. The phenomenon of banning the use of copyrighted works, as occurred in the dispute between Ahmad Dhani and Once Mekel, represents the resistance of creators to the blanket license mechanism managed by LMKN, which is considered unable to accommodate the economic interests of creators in a fair manner (CNN Indonesia, 2023; Detik.com, 2025). Substantial criticism was also conveyed by music industry practitioners, such as Piyu Padi, who highlighted the urgency of institutional evaluation of LMKN due to low transparency and public accountability (CNN Indonesia, 2025).

In addition to the legal polemics, public distrust is exacerbated by technical inefficiencies in the mechanism for withdrawing and distributing royalties. The calculation method applied is often not based on actual usage data (logsheet) but depends on estimation parameters such as commercial area. This approach drew criticism from various musicians, including Anji Manji (Sembiring, 2025) and Tompi, who questioned the validity and proportionality of the distribution of royalties received (CNN Indonesia, 2025). The absence of precise data has the potential to significantly reduce the economic rights of creators, especially for works that are factually used but not detected by the applied sampling system.

This legal uncertainty has also become a legislative concern. The Chairman of Commission X of the House of Representatives of the Republic of Indonesia, Syaiful Huda, stated that the centralization of LMKN creates overlapping authority with the existing LMK, which has an impact on bureaucratic complexity for art workers (Liputan6.com, 2021). The government, through the Ministry of Law and Human Rights (Kemenkumham), has acknowledged the weaknesses in governance supervision and is committed to making comprehensive improvements, including delaying the adjustment of royalty rates before transparency is achieved (Ministry of Law and Human Rights of the Republic of Indonesia, 2025). In order to formulate a constructive solution, this study conducted a comparative study of the royalty management system in the UK, which has been established through the PRS for Music and PPL entities. Both institutions operate specifically under the legal umbrella of the Copyright, Designs and Patents Act 1988, offering greater legal certainty (PRS for Music, n.d.; Situmorang, 2025). Therefore, this study aims to analyze the optimization of the role of LMKN by using the effectiveness of the system in the UK as a comparative benchmark.

The problem is not only experienced by creators but also by Commercial Users (Users). Business actors such as hotels and restaurants face legal uncertainty due to billing dualism and concerns over overlapping claims if they make direct license payments to creators while LMKN continues to charge based on collective rates.

In response to the complexity of these structural and operational challenges—particularly the crisis of trust and ineffectiveness of royalty distribution—this study argues that a critical evaluation of the regulatory and institutional framework of LMKN is urgent. Therefore, this study aims to analyze in depth the role of LMKN in the management of song and/or music royalties in Indonesia based on Law No. 28 of 2014 in conjunction with Government Regulation No. 56 of 2021, as well as to formulate recommendations for optimizing this role through a comparative study with the collective royalty management system in the United Kingdom.

Optimizing the Role of LMKN in Managing Royalties for Songs and/or Music: A Comparative Study Between Indonesia and the United Kingdom

58

RESEARCH METHOD

This research is normative legal research with a descriptive-analytical nature. The focus of the study is the analysis of norms in Law No. 28/2014, Government Regulation No. 56/2021, and CDPA 1988 (UK). The approaches used include the statute approach, the comparative approach, and the conceptual approach (Fajar & Achmad, 2010). Data collection was carried out through a literature study of primary and secondary legal materials, which were then analyzed qualitatively to draw deductive conclusions (Masidin, 2023).

This study employs a comparative legal methodology to analyze the institutional frameworks governing music royalty management in Indonesia and the United Kingdom. The comparative legal technique applied in this research is functional comparison, which focuses on comparing how different legal systems solve similar problems—in this case, the governance of music copyright royalties. The units of analysis being compared include: (1) institutional functions and structure, specifically the roles of LMKN in Indonesia versus the Copyright Tribunal and private Collective Management Organizations (CMOs) in the UK; (2) royalty collection mechanisms, examining centralized state-operated models versus market-based private entity operations; (3) dispute resolution mechanisms, comparing mediation-based approaches with quasi-judicial adjudication systems; and (4) transparency and accountability frameworks, including data management systems and supervisory mechanisms.

The United Kingdom was selected as the object of comparison for several strategic reasons. First, the UK has a well-established and mature copyright royalty management system under the Copyright, Designs and Patents Act 1988 (CDPA 1988), which has been tested and refined over more than three decades. Second, the UK model represents a successful market-based approach where private CMOs such as PRS for Music and PPL operate efficiently under state supervision, offering an alternative paradigm to Indonesia's state-centered model. Third, the existence of the Copyright Tribunal as an independent quasi-judicial body provides a compelling model for dispute resolution and tariff regulation that could be adapted to the Indonesian context. Fourth, both Indonesia and the UK share common membership in international copyright conventions (Berne Convention and TRIPS Agreement), making the legal comparison more relevant and applicable. Finally, the UK's experience in adapting its royalty management system to the digital age offers valuable lessons for Indonesia as it seeks to optimize LMKN's role in an increasingly digital music ecosystem.

As a primary comparison, this study examines the Copyright, Designs and Patents Act 1988 (CDPA 1988) from the United Kingdom. Data analysis was carried out qualitatively by comparing the institutional design, royalty collection authority, and tariff dispute resolution mechanism between the two jurisdictions to formulate recommendations for the ideal institutional model for Indonesia.

RESULT AND DISCUSSION

Juridically, the role of the National Collective Management Institution (LMKN) is positioned as the central instrument of the state that aims to provide legal protection and certainty for the economic rights of song and/or music creators (Mbaling & Silalahi, 2025). The establishment of LMKN is an explicit mandate of copyright regulation in Indonesia (Handradjasa et al., 2023). The institutional status of LMKN is uniquely defined as a "non-

state budget government assistance institution" (Maharani & Tarina, 2024). This institution was formed directly by the Minister (Novianti, 2025).

Institutionally, LMKN is divided into two different entities, namely LMKN Creator and LMKN Owner of Related Rights (Faisal, 2023). The main function mandated to LMKN is the management of the economic rights of creators (Mbaling & Silalahi, 2025). This fundamental function is manifested in three core tasks: attracting, collecting, and distributing royalties (Handradjasa et al., 2023). The mechanism functions as a one-gate system for royalty management in Indonesia (Mbaling & Silalahi, 2025). This institutional design confirms that Indonesia adheres to a collective license system or indirect license (indirect license) (Fattah & Wahyuni, 2025).

The authority of LMKN covers all forms of commercial use of musical works in the spectrum of public services (Maharani & Tarina, 2024). Service This public area covers a very large area, including seminars, restaurants, cafes, pubs, bars, bistros, nightclubs, discos, and music concerts (Faisal, 2023). This withdrawal mandate is formulated comprehensively by the implementing regulations (Novianti, 2025). LMKN is not only authorized to collect royalties for creators who have become members of the Collective Management Institution (LMK) (Novianti, 2025). The implementing regulation also gives the authority to LMKN to make expanded royalty withdrawals on behalf of creators who are not yet members of any LMK (Fattah & Wahyuni, 2025).

After the collection process, LMKN has an obligation to distribute the royalties to the creator or related rights owner (Handradjasa et al., 2023). The distribution mechanism is carried out through the LMK where the creators are patronized (Faisal, 2023). Especially for royalties withdrawn from non-members, LMKN is obliged to keep them as a "reserve fund" and announce them for a duration of two years (Handradjasa et al., 2023). In order to support transparency and accountability of distribution, LMKN is mandated to manage an integrated data center, known as the Song and/or Music Information System (SILM) (Siregar, 2023).

In addition to the collective function, LMKN also carries substantial administrative and quasi-regulatory authority (Faisal, 2023). This function includes the task of compiling a code of ethics for LMK, conducting supervision, and providing licensing recommendations to the Minister (Faisal, 2023). LMKN is also tasked with establishing the system and procedures for calculating royalties, as well as acting as a mediator in dispute resolution (Faisal, 2023). Despite having a strong normative foundation, the effectiveness of LMKN in carrying out its role in the digital era is considered to have not shown optimal effectiveness (Mbaling & Silalahi, 2025). Implementation in the field faces various structural and operational obstacles (Mbaling & Silalahi, 2025). These problems include the limitations of technical regulations and digital systems that have not operated optimally (Mbaling & Silalahi, 2025).

The most significant problem that arises is the crisis of trust from stakeholders, especially songwriters (Novianti, 2025). This crisis is triggered by a lack of transparency in the royalty collection and distribution system (Mbaling & Silalahi, 2025). This crisis of public trust was widely confirmed when there was an incident of administrative error in the transfer of royalties experienced by musician Ari Lasso (Novianti, 2025). The incident even prompted the Minister of Law and Human Rights to publicly confirm the existence of deficiencies in the monitoring mechanism for LMKN governance (Novianti, 2025).

Optimizing the Role of LMKN in Managing Royalties for Songs and/or Music: A Comparative Study Between Indonesia and the United Kingdom

60

Responding to the public's insistence on transparency, the Government issued Regulation of the Minister of Law Number 27 of 2025. This regulation seeks to improve governance through the establishment of a "Supervisory Team" that has the authority to evaluate the performance of LMKN and LMK periodically, as well as recommend sanctions for revocation of operational permits for entities that violate the rules (Permenkum No. 27 of 2025, Articles 51-53). Although the presence of the Supervisory Team is a progressive step, this regulation is still considered administrative and has not touched the root of the problem, namely the dual role of LMKN as a regulator as well as an operator. Without a clear separation of functions, the effectiveness of this internal oversight is still questionable when compared to the external adjudication model applied in developed countries.

Institutionally, the top-down structure of LMKN is alleged to have created dualism and overlapping jurisdictions with pre-existing private LMKs (Mbaling & Silalahi, 2025). This situation has the potential to create legal uncertainty for commercial users (Fattah & Wahyuni, 2025). In addition, the risk of overlapping claims is also a concern (Fattah & Wahyuni, 2025).

This juridical discourse is reflected in the dispute between Ahmad Dhani and Once Mekel (Maharani & Tarina, 2024). The case raises "questions about the responsibility and authority of LMKN" in protecting the economic rights of creators (Maharani & Tarina, 2024). This has sparked a debate about the validity of direct licenses supported by some musicians (Fattah & Wahyuni, 2025). These musicians see a conflict of authority between LMK and LMKN (Fattah & Wahyuni, 2025). The current system is considered too centralised, rigid, and considered a "system failure" (Fattah & Wahyuni, 2025).

These various governance and regulatory problems are exacerbated by the insufficiency of integrated data infrastructure (Mbaling & Silalahi, 2025). The regulatory mandate that requires the distribution of royalties based on accurate data from SILM is reported to be not functionally operational (Handradjasa et al., 2023). A case study in Cirebon found a discrepancy in the field, where "no data collection" was carried out through SILM when withdrawing royalties from restaurants (Siregar, 2023). In practice, LMKN was found to still rely on "sampling techniques through global song usage data" to determine distribution (Siregar, 2023).

The problem of this data collection system is crucial, especially in the digital streaming sector (Handradjasa et al., 2023). A juridical review concluded that LMKN is "not yet effective" in managing royalties derived from platforms such as Spotify (Handradjasa et al., 2023). The main cause is the absence of a definitive tariff formulation or "ratification of royalty rates" specific to streaming services in existing regulations (Handradjasa et al., 2023). As a result, it was found that the royalty payment mechanism of Spotify operates outside of the collective mechanism of LMKN (Handradjasa et al., 2023). The payment flows from the streaming platform to the Distributor Label, then to the Digital Publisher, before finally being accepted by the creator (Handradjasa et al., 2023). In response to these various polemics, LMKN finally took reactive action by launching a lmknlisensi.id web portal (Maharani & Tarina, 2024). The launch of this site aims to "make it easier for users" to take care of licensing royalty payments, especially for commercial use such as concerts and bazaars (Maharani & Tarina, 2024).

Responding to the public's insistence on transparency, the Government issued Regulation of the Minister of Law Number 27 of 2025. This regulation tries to improve governance

through the establishment of a "Supervisory Team" which has the authority to evaluate the performance of LMKN and LMK on a regular basis, as well as recommending sanctions for the revocation of operational permits for entities that violate the rules (Permenkum No. 27 of 2025, Articles 51-53). Although the presence of the Supervisory Team is a progressive step, this regulation is still administrative and has not touched the root of the problem, namely the dual role of LMKN as a regulator as well as an operator. Without a clear separation of functions, the effectiveness of this internal oversight is still questionable when compared to the external adjudication model applied in developed countries.

One of the root problems of inefficiency in the governance of music royalties in Indonesia lies in the construction of funding for the National Collective Management Institute (LMKN). Juridically, Article 91 paragraph (1) of Law Number 28 of 2014 concerning Copyright provides a limit on the use of operational funds for LMK at a maximum of 20% (twenty percent), while Article 29 paragraph (1) of the Regulation of the Minister of Law Number 27 of 2025 provides additional authority for LMKN to take a portion of operational funds of 8% (eight percent) of the total royalties collected (Law Number 28 of 2014; Regulation of the Minister of Law Number 27 of 2025). This provision is a logical consequence of the status of LMKN which is defined as a "non-state budget government assistance institution" (Regulation of the Minister of Law Number 27 of 2025, Article 1 number 8).

However, from the perspective of business and economics law, this institutional design creates a serious conflict of interest. Because the commissioner's operations and salaries depend on royalty deductions, LMKN has an economic incentive to act aggressively as a "money-gathering operator" (royalty puller) rather than exercising its ideal function as an objective regulator or supervisor (Towse, 2014). This traps LMKN in a dual role as a regulator as well as a business operator, which distorts the market mechanism that should run on a business-to-business basis between private LMKs and users.

Furthermore, this self-financing scheme charges double transaction costs to copyright holders. When LMKN as an "aggregator" at the national level cuts operational funds by 8% before the funds are distributed to LMK, which is also entitled to cut operational costs by up to 20%, then the economic value received by creators and owners is eroded very significantly (Hviid et al., 2016). Instead of providing welfare, this fat bureaucratic structure disproportionately reduces the economic rights of creators. Therefore, the reorientation of funding sources is an inevitable urgency. Given that LMKN was formed by the Minister to carry out public functions – namely ensuring legal certainty and national royalty governance – the operational burden of this institution should be the responsibility of the state through the State Revenue and Expenditure Budget (APBN), not charged to artists' royalties. This model is in line with practice in the UK, where the role of the state through the Intellectual Property Office (IPO) and the Copyright Tribunal is present as a state-funded facilitator and adjudicator, rather than as an entity that cuts off industry revenues to finance itself (Copyright, Designs and Patents Act 1988; Intellectual Property Office, 2015).

LMKN's operational expenses incurred from royalty deductions not only create conflicts of interest, but also potentially conflict with the principle of efficiency in international law. Article 41 paragraph (2) of the TRIPS Agreement expressly mandates that the procedure for enforcing intellectual property rights must not be "unnecessarily complicated or costly". The current LMKN funding structure creates high transaction costs which actually reduce the

Optimizing the Role of LMKN in Managing Royalties for Songs and/or Music: A Comparative Study Between Indonesia and the United Kingdom

economic benefits that creators should receive according to the mandate of Article 11bis Berne Convention on equitable remuneration.

The effectiveness of copyright management in the UK is inseparable from the history of its industrial structure that has grown organically and market-based. In contrast to Indonesia, which tends to be centralised, the dynamics of the music industry in the UK, especially after the acid house explosion in the late 1980s, are marked by the massive decentralization of cultural production. Hesmondhalgh (1998) notes that the period gave rise to thousands of micro-scale independent record labels (micro-companies) that were able to operate efficiently thanks to the democratization of digital recording technology. This phenomenon creates a highly competitive ecosystem in which independent labels and large corporations (majors) interact with each other in complex but autonomous distribution and licensing networks (Hesmondhalgh, 1998). This historical condition confirms that royalty governance in the UK was formed from the need for industry players to regulate healthy market competition on a bottom-up basis, not due to operational intervention from the state. This is the basis for why the role of the state through the Copyright Tribunal in the UK is more focused on the function of adjudicating tariff disputes, rather than being the sole operator of royalty collectors like LMKN in Indonesia

Unlike Indonesia, the system in the UK does not have a central state institution that oversees collecting royalties operationally. Under the regime of the Copyright, Designs and Patents Act 1988 (CDPA 1988), the state presence is represented by the Copyright Tribunal. The jurisdiction of this Tribunal is not to collect royalties, but to hear and decide disputes related to licensing schemes.

In the event of a tariff dispute between a user and a collective management institution (such as PRS for Music or PPL), the 1988 CDPA empowers the Tribunal to confirm or vary the licensing scheme to be "reasonable in the circumstances"). This model creates a healthy competitive climate where CMOs work professionally to attract royalties, while the state is present to guarantee the absence of abuse of dominant positions through specialized judicial mechanisms.

The fundamental difference between Indonesia and the UK lies in the depth of state intervention. In Indonesia, Government Regulation No. 56 of 2021 places the state (through LMKN) as a "super operator" that attracts one-stop royalties. In contrast, in the UK, the role of the state through the Intellectual Property Office (IPO) is very limited to regulatory and supervisory functions, not levy operations (IPO, 2015).

The study of Hviid, Schroff, and Street confirms that in the digital age, the assumption that royalty management is a "natural monopoly" that entities must master singular is no longer relevant (Hviid et al., 2016). Technology allows for more efficient competition between LMKs (Collective Management Organizations). Therefore, the direct "intervention" of the state in the withdrawal of royalties in Indonesia has the potential to hinder market efficiency and licensing innovation that should grow organically from the industry (Towse, 2014).

If Indonesia wants to adopt the efficiency of the British system, the position of the LMKN needs to be reformed. Currently, LMKN holds the dual burden as a regulator (setting tariffs) as well as an operator (collecting royalties). This creates a conflict of interest and is less effective in running the bureaucracy.

Learning from the UK, the functions of dispute resolution and fair pricing are handled by an independent body called the Copyright Tribunal. This agency does not take care of the withdrawal of money, but focuses on adjudicating tariff disputes between LMK and consumers (Bently & Sherman, 2018).

The future of LMKN should ideally be directed to become a body like an Independent Supervisory and Dispute Resolution Body. LMKN no longer needs to "get your hands dirty" in dealing with daily royalty withdrawals, but instead focus on:

1. Transparency Audit: Ensure each LMK adheres to strict transparency standards such as the Annual Transparency Report required in the UK (IPO, 2015).
2. Tariff Adjudication: Mediating tariff disputes between users and rights holders, ensuring reasonable tariffs without having to intervene directly in the market.

Osborne highlights that in the UK, despite the free running of markets, the state remains present through legislation to protect the weak, for example through the discourse of Equitable Remuneration (ER) rights to streaming (Osborne, 2025). This is the right form of "presence" of the state: not taking over business, but making the rules of the game fair.

In Indonesia, the state should step back from its operational role and let private LMKs (representing certain genres or rights) work to compete to provide the best service for their members. The role of the state (via the new LMKN) is to ensure that the competition is healthy and that no LMK withholds the rights of its members or conducts night-infiltration (Street et al., 2018).

One of the reasons for centralization in Indonesia is the problem of data. However, the UK's solution shows that what is needed is data centralization, not the centralization of money flow. In the UK, initiatives such as the Global Repertoire Database (GRD) are encouraged to clean up the data, while money continues to flow directly from LMK to creators (Hviid et al., 2016).

In the future, LMKN should be focused on building and supervising the national license data infrastructure (SILM) as a single reference, but allowing financial transactions to be carried out business-to-business between LMK and users. This will cut the bureaucracy and double administrative cuts that musicians have been complaining about.

Comparing the two systems, the ineffectiveness in the Indonesian model is seen. LMKN is currently burdened with operational tasks that should be able to be carried out by competing private LMKs. Based on Permenkum 27/2025, the role of supervision has begun to be strengthened, but true optimization will achieve if the LMKN transforms its function to resemble the Copyright Tribunal in the UK.

Table 1. Transformation of LMKN's Role in Royalty Management

Aspects	Model Indonesia (UUHC 2014 & Permenkum 27/2025)	The British Model (CDPA 1988)	LMKN Transformation Recommendations
The Role of the State	Active Operator: Manage the withdrawal and distribution of royalties via LMKN (Article 89 UUHC).	Passive Regulator: Creates rules of the game, standards and oversees compliance	Supervisors & Regulators: LMKN focuses on auditing and validation of usage data song (SILM).

Optimizing the Role of LMKN in Managing Royalties for Songs and/or Music: A Comparative Study Between Indonesia and the United Kingdom

64

Dispute Resolution	Mediation: Conducted by LMKN or DJKI (Article 16 GR 56/2021), but lacks executory power.	Adjudication: *The Copyright Tribunal* has jurisdiction to decide tariff and licensing disputes (Section 149 CDPA).	Quasi-Judicial: LMKN is empowered to decide tariff disputes such as the Tribunal, not just mediation.
Control Mechanism	Administrative: Annual evaluation by the Supervisory Team (Article 51 of Permenkum 27/2025)	Judicial: Control through a binding Tribunal decision on a licensing scheme (Section 123 of the CDPA).	Compliance Enforcement: Using the results of the Supervisory Team's audit as the basis for strict sanctions, not administrative only.

This transformation requires LMKN to give up the function of "cashier" (royalty collector) and focus on becoming an administrative "auditor" and "judge". Thus, the transparency of song data (SILM) mandated by Article 47 of Permenkum 27/2025 is the main instrument of LMKN in supervising the fairness of distribution carried out by private LMKs

CONCLUSION

This study concludes that Indonesia's National Collective Management Institution (LMKN), as defined in Law Number 28 of 2014 and its derivatives, suffers from structural ineffectiveness due to its conflicting dual role as regulator and royalty operator, with palliative measures like the Regulation of the Minister of Law Number 27 of 2025 failing to address the root issue of excessive state dominance over market functions. Drawing from a comparative analysis with the UK's effective system, it recommends a paradigm shift to a regulated market-based model, transforming LMKN from a "national cashier" into an independent supervisory and quasi-judicial body akin to the Copyright Tribunal—handling disputes under the CDPA 1988 and auditing LMK transparency via the Song and/or Music Information System (SILM)—while delegating royalty collection to competitive private LMKs to restore trust, reduce bureaucracy, enhance creator remuneration, and align with Berne Convention and TRIPS obligations. For future research, empirical studies could quantitatively assess the economic impact of this proposed model through simulations of royalty distribution efficiency and stakeholder surveys post-reform implementation.

REFERENCES

Bently, L., & Sherman, B. (2018). Intellectual property law (5th ed.). Oxford University Press.

CNN Indonesia. (2023, April 1). Kronologi perseteruan Ahmad Dhani larang Once bawa lagu Dewa 19. https://www.cnnindonesia.com/hiburan/20230401070011-227-932161/kronologi-perseteruan-ahmad-dhani-larang-once-bawa-lagu-dewa-19

CNN Indonesia. (2025, Juni 25). Piyu geram lihat kerja LMKN di tengah kisruh royalti: Bubarkan saja. https://www.cnnindonesia.com/hiburan/20250625165103-227-1243794/piyu-geram-lihat-kerja-lmkn-di-tengah-kisruh-royalti-bubarkan-saja

CNN Indonesia. (2025, Agustus 25). Tompi kritik sistem penarikan royalti LMK: Enggak jelas. https://www.cnnindonesia.com/hiburan/20250825193825-227-1266290/tompi-kritik-sistem-penarikan-royalti-lmk-enggak-jelas

Dirkareshza, R. (2025, Maret 5). Menguak tantangan penegakan hak cipta di industri musik tanah air. Hukumonline. https://www.hukumonline.com/berita/a/menguak- tantangan-penegakan-hak-cipta-di-industri-musik-tanah-air-lt67c7fc9ce207a/

Dirkareshza, R. (2025, Mei 8). Dinamika masalah direct licensing musik di Indonesia. Hukumonline. https://www.hukumonline.com/berita/a/dinamika-masalah-direct-licensing-musik-di-indonesia-lt681b96bd8bc15/

Faisal, M. (2023). Tugas dan wewenang Lembaga Manajemen Kolektif Nasional berdasarkan Undang-Undang Hak Cipta. "Dharmasisya" Jurnal Program Magister Hukum FHUI, 2(3), 1357–1372.

Fattah, A. S., & Wahyuni, R. (2025). Implementation of "Direct VS Indirect License": A comparative study of music licensing systems between Indonesia and the United States of America. Law Development Journal, 7(2), 284–301. http://dx.doi.org/10.30659/ldj.7.2.284-301

Handradjasa, J. L., Ismail, & Iryani, D. (2023). Tinjauan yuridis terhadap peran Lembaga Manajemen Kolektif Nasional (LMKN) dalam pendistribusian royalti untuk pencipta pada pemutaran lagu pada aplikasi musik berbasis streaming Spotify.

Hviid, M., Schroff, S., & Street, J. (2016). Regulating Collective Management Organisations by Competition: An Incomplete Answer to the Licensing Problem?. Journal of Intellectual Property, Information Technology and E-Commerce Law (JIPITEC), 7, 256.

Ibrahim. (2025). Legal study on the payment mechanism of copyright royalties and its implications in the Indonesian creative industry. Jurnal Greenation Sosial dan Politik, 3(2). https://doi.org/10.38035/jgsp.v3i2

Intellectual Property Office (IPO). (2015). Collective rights management in the Digital Single Market: Government response. UK Intellectual Property Office.

Karim, A. (2021). Kepastian hukum LMKN sebagai lembaga terpadu satu pintu penghimpun dan pendistribusi royalti hak cipta dan hak terkait bidang musik dan lagu. Legalitas: Jurnal Hukum, 13(1), 64–79. http://dx.doi.org/10.33087/legalitas.v13i1.232

Maharani, V. N., & Tarina, D. D. Y. (2024). Wewenang dan tanggung jawab Lembaga Manajemen Kolektif Nasional (LMKN) dalam perlindungan hak ekonomi musisi Indonesia. Jurnal Interpretasi Hukum, 5(1), 881–888. https://doi.org/10.55637/juinhum.5.1.8545.881-888

Masidin, S. H. (2023). Penelitian hukum normatif: Analisis putusan hakim. Prenada Media.

Mbaling, C. M. V., & Silalahi, W. (2025). Efektivitas Lembaga Manajemen Kolektif Nasional dalam perlindungan hak ekonomi pencipta lagu di era digital di Indonesia. Jurnal Kertha Semaya, 13(9), 2145–2154. https://doi.org/10.24843/KS.2025.v13.109.p19

Novianti. (2025, September). Peran LMKN dalam pengelolaan royalti. Isu Sepekan, Badan Keahlian DPR RI.

Osborne, R. (2025). The Law of Averages: The Use and Abuse of Statistics in UK Music Streaming Debates. Popular Music and Society, 48(4), 482–499.

PRS for Music. (n.d.). What we do. Diakses pada 9 Oktober 2025, dari https://www.prsformusic.com/what-we-do

Rabbani, L. (2023). Peran Lembaga Manajemen Kolektif Nasional sebagai pengelola royalti hak cipta lagu dan musik. Lex Lata: Jurnal Ilmiah Ilmu Hukum, 5(2), 206–217. https://doi.org/10.28946/lexl.v5i2.2044

Optimizing the Role of LMKN in Managing Royalties for Songs and/or Music: A Comparative Study Between Indonesia and the United Kingdom

66

Siregar, H. R. I. (2023). Peran Lembaga Manajemen Kolektif Nasional dalam perlindungan royalti hak cipta lagu dan/atau musik perspektif Undang-Undang Nomor 28 Tahun 2014 jo. Peraturan Pemerintah Nomor 56 Tahun 2021 dan maqashid syariah pada restoran di Kota Cirebon [Skripsi, IAIN Syekh Nurjati Cirebon].

Situmorang, S. (2025). Reformasi pengelolaan royalti musik: Menuju sistem satu pintu oleh LMKN. Jurnal Jummy Ibrahimy. https://doi.org/10.35316/jummy.v3i1.7235

Street, J., Laing, D., & Schroff, S. (2018). Regulating for Creativity and Cultural Diversity: the Case of Collective Management Organisations and the Music Industry. International Journal of Cultural Policy, 24(3).