

**LEGAL ANALYSIS OF COPYRIGHT INFRINGEMENT
IN COMMERCIAL USE OF SONGS AND/OR MUSIC
(CASE STUDY OF MIE GACOAN FRANCHISE ROYALTIES)**

Daniel Vinato, Ismail Koto

Email: danilvinato@gmail.com

Universitas Muhammadiyah Sumatera Utara

ABSTRACT

This study analyzes copyright infringement in the commercial use of songs and/or music and its legal liability implications, using a case study of royalties in the Mie Gacoan franchise. Playing songs in commercial business spaces constitutes a form of exploitation of the creator's economic rights, requiring a license and royalty payments. However, in practice, some businesses still use musical works without permission or without fulfilling their royalty payment obligations, resulting in legal issues and economic losses for the creator. Normatively, the obligation to pay royalties is regulated by Law Number 28 of 2014 concerning Copyright and Government Regulation Number 56 of 2021 concerning Management of Song and/or Music Royalties. These provisions emphasize that any use of songs and/or music for commercial purposes must go through a licensing mechanism and royalty payments to the creator or through a Collective Management Institution. Violations of these provisions have the potential to result in legal consequences, both in the civil and administrative realms. This study uses a normative juridical method with a statutory and conceptual approach. Primary, secondary, and tertiary legal materials were collected through literature studies and analyzed qualitatively to examine the forms of violations and legal accountability mechanisms that can be applied to business actors who do not fulfill royalty obligations. The results of the study indicate that the commercial use of songs without a license constitutes a violation of the creator's economic rights and fulfills the elements of an unlawful act as regulated in Article 1365 of the Civil Code. Legal protection for creators can be achieved through lawsuits for damages, termination of use of the work, and the obligation to pay royalties through a Collective Management Institution. This study confirms that compliance with royalty obligations is part of the legal responsibility of business actors in ensuring legal certainty and justice for creators in the copyright protection regime.

Keywords: Intellectual Property Rights, Copyright, Song Royalties, Unlawful Acts, Franchises.

A. Introduction

The development of the creative industry in Indonesia has driven the increasing use of songs and/or music as a means of supporting commercial business activities, including in the restaurant and franchise sectors. Music serves not only as entertainment but also as part of a business strategy to create an atmosphere and increase consumer appeal. However, the use of songs in the commercial business sector constitutes a form of exploitation of the creator's economic rights, which legally requires permission and royalty payments. These provisions are regulated in Law Number 28 of 2014 concerning Copyright, which affirms that creators have the exclusive right to publish and reproduce their works.

Intellectual Property serves to provide legal protection for the ownership of intellectual works, both collective and individual, which form the foundation for the development of the creative economy. Intellectual property protection is thus a crucial element for future national development and makes a significant contribution to economic progress, both nationally and globally. As a developing country, Indonesia must be able to take appropriate action to anticipate all changes, progress, and global trends to achieve national goals (Ismail Koto, 2023).

Sometimes, the right to express oneself seems to conflict with copyright, although some argue that the two can be compatible. This is because copyright protects the way someone conveys an idea, not the idea itself or the information. This means that others can convey similar ideas or use information from a specific work in their own work, as long as they convey it differently. For example, the phenomenon of cover songs, where different versions of a song are sung by other artists or individuals other than the original creator, falls within the realm of freedom of expression. However, if these cover versions are used for commercial purposes, this can create legal issues, as it can lead to copyright infringement disputes with the original copyright owner. (Juardi, et.al, 2023)

Based on Article 1 number (1) of Law No. 28 of 2014 concerning Copyright, it is stated that copyright is an exclusive right owned by the creator, which arises automatically without having to submit an application, after the creative work is made in a tangible form, as long as it does not conflict with the rules in applicable laws. Law No. 28 of 2014 concerning Copyright

stipulates that the commercial use of creative works is one of the criteria for determining whether the copyright applies. (Reylandho, 2023)

In the use of copyrighted works such as songs by other parties in commercial business activities, in accordance with Law No. 28 of 2014 concerning Copyright, the party must first obtain permission from the creator or copyright holder. This permission is in the form of a license, as stated in Article 1 number (20) of Law No. 28 of 2014 concerning Copyright, namely written permission given by the copyright holder or owner of related rights to another party, to exercise economic rights to his work or related rights products.

One recent case illustrating this issue occurred at the Mie Gacoan franchise in Bali, where it was discovered to have played copyrighted songs in its restaurant premises for commercial purposes without permission or royalty payments to the songwriters. This case came to public attention through media coverage and the attention of intellectual property rights activists, as it was perceived as reflecting a lack of compliance by businesses with copyright law.

On August 8, 2025, PT Mitra Bali Sukses, the owner of the Mie Gacoan chain, agreed to a settlement with SELMI in a music copyright infringement dispute. The mediation process was facilitated by the Ministry of Law and Human Rights of the Republic of Indonesia (Kemenkumham) Bali and witnessed directly by Supratman Andi Agtas. The result of the mediation: Mie Gacoan was fined and required to pay royalties of approximately IDR 2.2 billion to the National Collective Management Institute (LMKN) through SELMI as compensation for the playing of copyrighted songs in their 65 outlets throughout Indonesia from 2022 to 2025.

The urgency of this research is further strengthened by the case of the Mie Gacoan franchise in Bali, which played copyrighted songs without a license and without paying royalties. The dispute culminated in mediation facilitated by the Ministry of Law and Human Rights of the Republic of Indonesia and involving the National Collective Management Institute (LMKN) and SELMI as the relevant rights administrator. The settlement, through a royalty payment of approximately Rp2.2 billion, demonstrates that copyright infringement in the business sector is not merely an administrative issue but also has significant legal and economic implications.

This research is urgently needed considering the increasing practice of using songs and/or music in commercial business activities that are not fully accompanied by awareness

and legal compliance with copyright provisions. Although Law Number 28 of 2014 concerning Copyright has expressly stipulated that the use of the economic rights of creators, including the announcement and use of songs for commercial purposes, must obtain permission and be accompanied by royalty payments, in practice many business actors still ignore these obligations. This condition indicates a gap between legal norms and implementation in the field.

B. Research Methods

A study cannot be called research if it does not have a research method.¹ Research methods are one of the factors of a problem that will be discussed. The study was conducted using secondary data which was analyzed qualitatively using the Desk Research Method. The literature materials used in writing this research are several references originating from research results, studies, and reviews of several writings which are then summarized into a scientific paper.²

C. Discussion

1. Legal Provisions Regarding the Play of Songs and/or Music in Franchise Outlets

A song and/or music is a complete work, even if it consists of elements of a song or melody, lyrics, and arrangements, including notation. Meanwhile, what is meant by complete is that the song and/or music constitute a unified work of creation. In international legal literature, the term commonly used to refer to songs and/or music is musical work. The Berne Convention for the Protection of Literary and Artistic Works states that one of the protected musical works is a musical composition with or without words (with or without words). (Edward, 2020)

A song and/or music creation that is protected based on the basic concept of copyright protection is an idea that has a physical form and is original. As explained in the general UUHC explanation, copyright protection is not given to ideas or concepts because the work of creation must have a unique form, be personal, and show originality as a creation born based on ability, creativity, and expertise so that the creation can be seen, read, and heard.

¹ Hanifah, I., Hariyanto, H., Ginting, L., Koto, I., & Syafriana, R. (2026). Legal Protection of Indonesia's Fisheries from Foreign Investment: A Social-State Approach. *Jurnal IUS Kajian Hukum dan Keadilan*, 14(1).

² Simatupang, R. S. A., Hanifah, I., & Mansar, A. (2025). The Concept of Restitution as Legal Accountability in the Crime of Human Trafficking. *Pena Justisia: Media Komunikasi dan Kajian Hukum*, 24(1), 3554-3462.

The use of songs and music in restaurants and cafes, when viewed from a copyright law perspective, is considered commercial use of song creations. According to copyright law, creators have exclusive rights to their works, including songs. Those using them for commercial purposes must obtain permission from the creator or copyright holder, and this permission or license is generally accompanied by royalty payments. (Dharmawan, 2017).

Article 1 (1) of Law Number 28 of 2014 concerning Copyright explains that Copyright is the exclusive right of the creator which arises automatically based on the Declarative Principle after a creation is realized in a tangible form without reducing restrictions in accordance with the provisions of statutory regulations. In this explanation, what is meant by "exclusive rights" is that only the creator and copyright holder may freely use the copyright, while other people or parties are prohibited from using the copyright without permission from the copyright holder.

The legal provisions for playing songs and/or music according to Law Number 28 of 2014 concerning Copyright are part of Intellectual Property Rights which provide protection for creative works in the fields of science, art, and literature. Songs and/or music are one form of protected work. Law Number 28 of 2014 concerning Copyright strictly regulates the exclusive rights held by creators or copyright holders over their creations, including the right to grant permission or prohibit the use of their works by other parties as regulated in Government Regulation 56 of 2021 concerning Royalties.

Based on the Copyright Law, Article 9 paragraph (1) letters b and g, creators or copyright holders have the economic right to reproduce and announce their creations. Playing songs and/or music at franchise outlets is included in the category of announcing creations to the public. Therefore, every form of playing songs and/or music must obtain permission from the copyright holder or permission from the National Collective Management Institute (LMKN).

Public performance Article 87 paragraph 1 of the UUHC refers to commercial public services. However, the UUHC does not clearly define "commercial public services" or "public performance." This is likely because the UUHC's creators assumed that everyone already understood the meaning of "commercial public services" as defined in the UUHC and "Public Performance." (Marulam, 2022)

Through the Explanation of Article 80 paragraph (5) of Law No. 28 of 2014 concerning Copyright, it is emphasized that the calculation and imposition of the amount of royalties need

to pay attention to the elements that are the basis for calculating the amount of royalties, for example, the number of seats, the number of rooms, the area of the room, the number of copies copied in accordance with common customs/practices. Article 6 of the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia No. 29 of 2014 concerning Procedures for Application and Issuance of Operational Permits and Evaluation of Collective Management Institutions stipulates that one of the duties of the Collective Management Institution is to determine the system and procedures for calculating royalty payments by users to the Collective Management Institution. (Hulman, 2019)

Playing songs and/or music in business establishments, such as franchise outlets, constitutes a form of commercial use of a work, which legally falls within the scope of the creator's economic rights. Therefore, every business actor is required to comply with licensing and royalty payment provisions as stipulated in Law Number 28 of 2014 concerning Copyright, Government Regulation Number 56 of 2021, and other implementing regulations.

The existence of Collective Management Institutions and National Collective Management Institutions is a crucial instrument in ensuring the effective fulfillment of creators' economic rights. Therefore, compliance with licensing and royalty payment mechanisms not only provides legal certainty for businesses but also provides fair and proportional legal protection for songwriters regarding the use of their works in the public sphere.

2. Legal Protection for Songwriters against Copyright Infringement

According to Satjipto Rahardjo, legal protection is providing protection for human rights that have been harmed by others and this protection is given to the community so that they can enjoy all the rights granted by law (Rahardjo, 2000).

Law is an official and binding regulation, enacted by the authorities or government. Meanwhile, protection implies certainty regarding peace, security, and comfort. It can be concluded that legal protection is a protective measure implemented by the government through existing regulations. Legal protection is manifested in the form of laws and regulations.

Regulations regarding Copyright protection related to the use of songs for commercial purposes in Indonesia are regulated in Article 9 Paragraph (3) of the Republic of Indonesia Law Number 28 of 2014 concerning Copyright. The article states that: "Any person who, without permission from the Creator or Copyright Holder, is prohibited from duplicating and/or using the creation commercially." Commercial use is an activity that aims to obtain economic

benefits from various sources or is paid for the use of creations and/or related rights products. (Firmandanu, 2021)

The recognition of copyright as an intangible entity deserving of legal protection stems from the development of the copyright concept internationally. The emergence of doctrines, accompanied by international conventions, fostered an understanding of copyright as a legal entity. Two of these treaties are the WIPO Copyright Treaty and the WTO's TRIPS Agreement. Both require participating countries to provide the broadest possible access for the public to register their copyrights, thereby securing legal protection. Indonesia, as a member of these two treaties, implemented these principles by enacting the Copyright Law. (Abdullah et al., 2021)

Registration of rights is the basis of legal protection. To prove that a creator has rights to his work, Article 64 Paragraph (2) of the Copyright Law states that registering creations and related rights products is not a requirement for obtaining copyright and related rights. Based on the explanation of Article 64 Paragraph (2) of the Copyright Law, registering creations and related rights products is not an obligation for creators, copyright holders, or owners of related rights. Protection of a creation begins from the moment the creation exists or is realized, not because of registration. This means that a creation, whether registered or not, remains protected. (Kusno, 2016)

Civil legal protection for songwriters can be provided in the form of preventive and repressive protection. Preventive protection aims to prevent copyright infringement, while repressive protection is provided after a violation has occurred to restore the rights and interests of the injured creator.

In one case of unauthorized commercial use of a song by the Bali Mie Gacoan Franchise, the parties chose to resolve the dispute through mediation and reached an agreement to pay compensation of IDR 2.2 billion. This agreement demonstrates that the primary objective of repressive civil law protection, namely the restoration of the creator's economic rights, can be achieved without having to go through a lengthy court process. Therefore, a peaceful dispute resolution mechanism remains a legitimate part of civil law protection as long as it does not eliminate the creator's rights.

3. Civil Liability of Business Actors for the Use of Songs Without Permission in Franchise Business Activities

Franchisors, both franchisees and franchisors, can in principle be held civilly liable if they are found to be involved in the unauthorized use of music. Franchisees, as the parties directly operating the outlets and playing music at their premises, have the primary responsibility to ensure that the use of music is carried out legally. However, franchisors can also be held liable if the franchise agreement requires the use of certain systems, concepts, or standards that include the playback of music without clear copyright provisions.

From a civil law perspective, the basis for a franchisee's liability for unauthorized use of a song can be based on Article 1365 of the Civil Code, which states that any unlawful act that causes harm to another person requires the perpetrator to compensate for the loss. The elements of an unlawful act, namely the existence of an act, an error, a loss, and a causal relationship between the act and the loss, can be met in cases of unauthorized playing of songs.

The act of using a song without a legal basis, errors in the form of negligence or deliberate actions by the business actor, losses in the form of loss of potential royalties for the creator, and a causal relationship between the playing of the song and the creator's economic loss, indicate that these elements are fulfilled.

Songs and/or music are art. As an art, songs and/or music are legally protected as a creation or creative work. Legal protection for songs and/or music is defined as an effort to protect someone who, through their expertise, intellect, and dexterity, is able to produce and/or create a work, one of which is in the field of songs and/or music. In relation to legal protection for songs and/or music in Indonesia, the scope of protected creations has been emphasized in Law Number 28 of 2014 concerning Copyright. (Winda, 2024)

Music royalties are a form of compensation that must be paid to parties who hold copyright or related rights to a musical work, such as songwriters, composers, arrangers, or publishers, as compensation for the use of the work in public spaces. In the context of business operations, for example restaurants, cafes, hotels, shopping centers, or entertainment venues, playing music as background music falls into the category of "commercial use," thus giving rise to a legal obligation to pay royalties. (Affila, 2025)

This obligation essentially embodies the principle of protecting Intellectual Property Rights (IPR), particularly copyright. If an entity uses a musical work without permission or without paying royalties, legal liability arises, which can take the form of civil liability, such as the obligation to pay compensation to the rights owner, or administrative liability, which is carried out through the LMK authorized to collect and distribute royalties.

The legal consequences of publishing without the permission of the songwriter are the emergence of civil lawsuits that can be filed through commercial courts or criminal charges. A lawsuit for compensation for copyright infringement is one form of legal protection provided by the Copyright Law for creators and copyright holders. Copyright holders are allowed to request the commercial court to seize copyright-infringing goods to be used as evidence in legal proceedings, ask the commercial court to stop ongoing copyright infringement, for example, stop unauthorized use of the copyrighted work, and ask the court to order the withdrawal of products or materials that infringe copyright from circulation.

Creators have the right to file a civil lawsuit against the infringer. In this lawsuit, creators can seek compensation for losses resulting from the copyright infringement, such as financial losses resulting from unauthorized use or unpaid royalties. (Inge Kalista, 2023)

Article 1365 of the Civil Code states that any unlawful act that causes harm to another person requires the person whose fault caused the harm to compensate for the loss. In the context of unauthorized use of a song, the elements of an unlawful act are met: the act, the fault, and the loss.

The case of unauthorized use of songs and/or music by the Mie Gacoan Bali franchise demonstrates the practice of exploiting copyrighted works in commercial business activities without complying with legal obligations. In its store operations, Mie Gacoan was found to play copyrighted songs in the business premises as part of its service and to create an atmosphere for consumers, but without obtaining a license or making royalty payments to the creators or through the Collective Management Institution as required by law.

The legal liability of a business actor such as Mie Gacoan related to the use of musical works in its business premises for commercial purposes without permission and without payment of royalties falls under the category of unlawful acts (*onrechtmatige daad*). When music is played in public spaces, whether in restaurants, cafes, shopping centers, hotels, or other entertainment facilities, this action is classified as notification of creations to the public in accordance with Article 9 of Law No. 28 of 2014 concerning Copyright. Therefore, the playing of this kind of music must be preceded by obtaining permission from the copyright holder or through the National Collective Management Institute. (Windi, 2025)

As a form of civil liability for the unauthorized use of songs and/or music in business activities, the Mie Gacoan franchise business actor finally fulfilled its legal obligations by paying royalties of 2.2 billion to LMKN Selmi as regulated in Article 3 (1) of PP Number 56

of 2021 concerning Management of Copyright Royalties for Songs and/or Music. The payment of royalties is a form of restoration of the creator's economic rights which were previously neglected due to the commercial use of copyrighted works without a valid legal basis. From a civil law perspective, the fulfillment of this obligation reflects the application of the principle of *restitutio in integrum*, namely an effort to restore the situation to a balanced condition as before the violation occurred.

The legal construction of the obligation to pay music royalties in the commercial public space is based on a hierarchy of laws and regulations starting from the substantive provisions in Article 9 paragraph (2) and Article 87 of the Copyright Law, which are then operationalized through implementing regulations in the form of Government Regulation Number 56 of 2021 concerning the Management of Song and/or Music Copyright Royalties. This legal framework establishes a legal imperative that every entity that utilizes song or music copyright works in a commercial context has a legal obligation to provide royalty compensation to the creator or copyright holder through an institutional mechanism facilitated by LMKN.

Technical elaborations regarding recording procedures, management systems, and royalty utilization mechanisms are comprehensively regulated in Minister of Law and Human Rights Regulation Number 20 of 2021 concerning Implementing Regulations of Government Regulation Number 56 of 2021 concerning Management of Song and/or Music Copyright Royalties, which serves as operational guidelines in policy implementation. Although this legal construction provides legal certainty and predictability in enforcing intellectual property rights, its implementation raises substantive problems related to the principle of proportionality in the application of sanctions, transparency in the governance structure of LMKN, and the absence of affirmative action mechanisms or differential treatment for the MSME segment, which has fundamentally different economic characteristics and financial capacity.

The absence of a policy instrument in the form of a progressive tariff scheme or a special exemption mechanism for micro and small business entities has the potential to create a counterproductive law enforcement paradox, manifested in systemic resistance and non-compliance behavior that can reduce the legitimacy and effectiveness of enforcement of the entire music copyright regime in Indonesia. (Rianda, 2025)

The fulfillment of royalty payment obligations by Mie Gacoan is carried out through a mediation mechanism between business actors and the National Collective Management Institute representing the interests of creators facilitated by the Ministry of Law and mediated

directly by the Minister of Law, Mr. Supratman Andi Agtas at the Bali Regional Office of the Ministry of Law (Kemenhum).

Mediation as a means of resolving civil disputes reflects the application of principles in Indonesian civil law, particularly the principle of good faith. In civil law, the parties are given the freedom to determine the method of dispute resolution as long as it does not conflict with statutory regulations, so that resolution through mediation is a manifestation of the parties' freedom to reach an agreement independently. Furthermore, mediation is also based on the principle of consensualism, because the resulting agreement is born from mutual consent without coercion, and is legally binding as stipulated in Article 1338 of the Civil Code.

D. Conclusion

Playing songs and/or music in franchise outlets constitutes a form of commercial use of a work, which falls within the scope of the creator's economic rights as stipulated in Law Number 28 of 2014 concerning Copyright. Any use of a song in a public space of a commercial nature, such as a franchise restaurant or cafe, requires permission from the creator or copyright holder and royalty payments through established mechanisms, including through the National Collective Management Institute. This provision is clarified through Government Regulation Number 56 of 2021 concerning Management of Song and/or Music Copyright Royalties, which emphasizes the obligation to pay royalties as a form of protection for the creator's economic rights.

Legal protection for songwriters is divided into two forms: preventive and repressive. Preventive protection is realized through the granting of exclusive rights, a licensing system, mandatory royalty payments, and the establishment of collective institutions to guarantee royalty distribution. Meanwhile, repressive protection can be pursued through civil lawsuits in the Commercial Court under Article 99 of the Copyright Law or through unlawful acts as stipulated in Article 1365 of the Civil Code. This mechanism aims to recover economic losses arising from the unauthorized use of songs.

In the context of civil liability for franchisees, both franchisees and franchisors can be held liable if proven to have committed or participated in the unauthorized use of a song. The elements of an unlawful act are met if there is a violation, fault, loss, and a causal relationship between the act and the loss. Using a song without a valid license results in the loss of potential royalties for the creator, thus giving rise to an obligation to compensate.

The case of the unauthorized use of a song by Mie Gacoan in Bali demonstrates that dispute resolution can be achieved through mediation as part of repressive civil law protection. The Rp2.2 billion royalty payment to LMKN reflects the application of the principle of *restitutio in integrum*, which restores the creator's economic rights to their original state before the violation occurred. Settlement through mediation also aligns with the principles of freedom of contract and good faith in Indonesian civil law.

Thus, playing songs and/or music in franchise outlets is not merely about entertainment but also has clear legal consequences. Compliance with licensing requirements and royalty payments is a legal obligation that businesses must fulfill to ensure legal certainty, protect the economic rights of creators, and strike a balance between business interests and the protection of intellectual property rights in Indonesia.

Bibliography

- Abbas Abdullah, Kevin Aprio Putra Sugianta, Khaerul Anwar, (2021), "The Position of Copyright as a Property Right and the Execution of Fiduciary Guarantees for Copyright", *Journal of Legal, Social and Political Science Research*, Volume 1 number 13
- Affila, et.al, (2025), "Legal Responsibility for Royalty Payment Obligations in the Mie Gacoan Case in Bali", *Jurnal Deli*, Volume 1 number 1
- Edward James Sinaga, (2020), *Royalty Management for Announcements of Song and/or Musical Works*, *Scientific Journal of Public Policy*, Volume 14 number 3
- Firmandanu Triatmojo, Achmad Irwan Hamzani, and Kanti Rahayu (2021), *Copyright Protection of Commercial Songs*, Central Java: NEM
- Habi Kusno, (2016), "Legal Protection of Copyright for Creators of Songs Downloaded via the Internet", Volume 10 number 3, *Justisia Journal*
- Hanifah, I., Hariyanto, H., Ginting, L., Koto, I., & Syafriana, R. (2026). Legal Protection of Indonesia's Fisheries from Foreign Investment: A Social-State Approach. *Jurnal IUS Kajian Hukum dan Keadilan*, 14(1).
- Marulam Hutaaruk, (2022), *Licenses & Royalties for Songs/Music in Public Places*, Jakarta: Yayasan Pustaka Obor Indonesia
- NKS Dharmawan, (2017), *Copyright Provisions Relating to Royalty Payments for Commercial Use of Song Creations in Restaurants/Cafes in the Jimbaran Bali Tourism Area*, *Udayana Mengabdi Bulletin Journal*, Volume 16 number 1
- Panjaitan, Wetmen Sinaga, (2019), *Performing Rights Copyright for Musical Works and Songs and Their Aspects (Revised Edition)*, Jakarta: Uki Press
- Rianda Dirkareshza, et.al, (2025), "The Urgency of Reformulating the Music Royalty Collection Mechanism for Restaurant MSMEs as a Solution to the Paradox of Copyright Law Enforcement in Indonesia", *Batavia Journal*, Volume 2 number 3
- Satjipto Rahardjo, (2000), *Legal Studies*, Bandung: PT. Citra Aditya Bakti
- Simatupang, R. S. A., Hanifah, I., & Mansar, A. (2025). The Concept of Restitution as Legal Accountability in the Crime of Human Trafficking. *Pena Justisia: Media Komunikasi dan Kajian Hukum*, 24(1), 3554-3462.

- Syahrul Ramadhon, Tini Rusmini Gorda, (2020), Legal Protection for Women as Victims of Domestic Violence in a Preventive and Repressive Way, Journal of Legal Analysis, Volume 3 number 2
- Winda Pertiwi, Firdaus, Nurahim Rasudin, (2024), Responsibility for Royalty Payments to Song and/or Music Copyright Holders by Cafe Business Actors in Sail District, Pekanbaru City, Journal of Social Science Research, Volume 4 number 4.