

Juridical Analysis of Copyright Protection of Cover Songs Uploaded on the Tiktok Application

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ABSTRACT

Copyright is a part of intellectual property which has a wide range of protected objects, because besides covering science it also includes art and literature, film, photography, dance, music etc. The problem to be examined is whether the cover of someone else's song uploaded on the Tiktok application is a copyright violation? and How is the legal protection for owners of covered songs uploaded to the Tiktok application? To find answers to the above problems, a normative research method was carried out, namely normative legal research, namely literature law research which refers to the legal norms contained in statutory regulations. The results showed that there are several things that are said to be a form of copyright infringement, if they are used for commercial personal interests and without the permission of the owner, they can be categorized as copyright infringement. Regarding copyright protection, the responsibility of Tiktok application users to copyright holders is responsibility in moral rights and responsibility in economic rights. As a content creator, actually has agreed to control Tiktok for the economic rights of our content, so that the song owner also gets legal certainty because Tiktok is an application that has the power of economic rights, and if the Tiktok video is circulating in electronic media, it actually has received permission from the content creator, this is in accordance with the terms of service on the Tiktok application.

Keywords: Copyright, Legal Protection, Cover Songs, Tiktok application

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INTRODUCTION

The development of the creative economy has encouraged someone who has productivity to produce a creative work that provides economic benefits for his creation. This productivity is supported by human creative power and existing technological developments. Regarding the results of these creations, civilized society recognizes that those who create may control for beneficial purposes (Roisah, 2015). The process of exploiting the creative economy for beneficial purposes must be protected by the government as the manifestation of the state to prevent violations of the use of this creative power. This protection is very necessary because the basis of the creative economy is based on the creative power itself, so it is very prone to violations.

Copyright protection in a legal perspective is not given to ideas or ideas because copyright works must have a distinctive form, be personal and show authenticity as a creation that was born based on ability, creativity or expertise so that the work can be seen, read, or heard (Sudjana, 2012). Copyright is one part of intellectual property rights (hereinafter referred to as IPR) which provides protection for works that are realized or produced in the form of works of art such as songs, films, photographs, paintings, dances, computer programs and so on. This copyright arises because the person who creates the work has the right to his creation, and to get certain legal protection can register it with the Directorate General of Intellectual Property, but even without being registered the copyright of the work remains attached to the person who created the work. According to Article 1 Number 1 of Law Number 28 Year 2014 concerning Copyright (hereinafter referred to as UUHC) which reads:

"Copyright is the exclusive right of a creator that arises automatically based on the declarative principle after a work is manifested in real form

without reducing restrictions in accordance with the provisions of the legislation regulations".

In copyright itself there are economic rights and moral rights, where these economic and moral rights remain as long as a creation is still protected by copyright. As for what is called an economic right is the right to benefit from IPR can be said to be an economic right because IPR is an object that can be valued in money (Supramono, 2010). Meanwhile, the problem of moral rights arises because basically everyone has an obligation to respect and respect the creations of others, other people cannot be at their will. Take or change someone's copyright into his name. The moral rights referred to are contained in Article 5 of the UUHC which reads: Keep or not include his name on the copy in connection with the use of his work for the public; Use his alias or pseudonym; Changing his creation according to the appropriateness of society; Change the title and sub-title of the Work, and; Defend their rights in the event of any distortion of the work, mutilation of the work, modification of the work, or anything that is detrimental to one's self or reputation.

Through Law no. 7 of 1994 concerning the Ratification of the WTO Agreement, Indonesia has become a member of the Agreement Establishing the World Trade Organization (WTO) which includes the Agreement on Trade Related Aspects of Intellectual Property Rights, hereinafter referred to as the TRIPs Agreement. The TRIPs Agreement is not a regulation regarding IPR protection specifically, but rather an agreement that is part of the WTO Agreement signed by its member countries. As a member, Indonesia must comply with the TRIPs Agreement including adjusting the international standard TRIPs Agreement into the Copyright Law in Indonesia (Dharmawan, 2017). After experiencing several changes to the old Copyright Law, a new provision was promulgated to replace the old one, namely Law No. 28 of 2018 concerning Copyright (hereinafter referred to as the

Juridical Analysis of Copyright Protection of Cover Songs Uploaded on the Tiktok Application

Copyright Law). In the copyright law, it is explained that what is meant by copyright is the executive right for the creator or the right recipient to announce, reproduce the copyright or grant permission for it without reducing the limitations of the applicable laws, one of the intellectual works that are subject to IPR, specifically a song or music. Along with the development of science and knowledge, products related to the creation of songs or music has contributed to the improvement of the community's economy. Music has become a very important part of life. Even the campus world is able to unite people in one music language. What if in this world without music, maybe how dry and crunchy a world without music (Nainggolan, 2011).

Particularly in the field of Moral Rights as contained in Article 5 UUHC letter e, where the copyright holder can defend the copyright of his work from distortion, mutilation and modification of creation according to the explanation of Article 5, what is meant by creation distortion is an act of reversing the fact or identity of the work. Creation mutilation is the process or act of removing part of the creation and modification of the creation is the alteration of a creation.

With the development of technology, many kinds of communication, social media and technology-based applications have been created. With the support of advances in technology and information at this time, many have created various entertainment applications, especially for smartphones, such as photo editor applications, videos, and online games. Famous at this time is the lip sync voice application (which is only doing lip movements according to the sound of the song) accompanied by using movements on the limbs, Tiktok is one of which is currently hits. Applications that are currently popular are applications that provide unique and interesting special effects that users can use easily so that they can make short videos with cool results and can be shown off to friends or other users. This short video social application has a lot of music support so that its users can perform their performance with dance, freestyle, and many more so as to encourage the creativity of its users to become a content creator. This Tiktok application takes songs that have been cut automatically, which are made attractively with a funny sound and style. Then the song can be used by other people with their own style through a video in less than 15 seconds, then the video results using a sound cut from songs from the application can be shared and disseminated on social media such as Instagram, Facebook, Twitter etc. other social media applications and can become viral or famous on social media.

But the use of the Tiktok application in practice also reaps pros and cons, because in this Tiktok application there is a song upload feature using songs from the application user itself, which sometimes users do not allow permission to the songs uploaded in the applications which are then cut off by the Tiktok application. Application users can change the tempo, add effects to the sound of the song which is then made into a short video which can then also be uploaded to the application which can be used by other users after the video is published.

The taking of the song without permission then changes in time duration and sound effects on the sound of the song in the Tiktok application, indicating that a work of the song has been changed from the original version which might cause an opinion or understanding that is

different from what is expected by the holder, copyright and other people who also listen to it.

In the Tiktok application itself, there is already a Term of Reference or terms of use related to the content uploaded to the application in the user generated content section. This explains that when a user sends content through the application, the user agrees and states that the user who owns the content, or the user has received permission, or is authorized by the owner of each piece of content to send it to the application service, but from the fact that the application user does not give prior permission to the copyright owner of the part of the content sent.

Currently there are so many people, one of them the Indonesian people, especially among the millennial, who are using social media applications, one of which is Tiktok. Through this media, they make various videos, one of which is a cover of a song that is currently being carried out by millennial. In the cover of the song, they re-sing the song in an original way like the original singer, some have arranged the music, and some are singing with their own color. In this article, we will discuss the cover version uploaded to the Tiktok account. Cover version is related to copyright because it is re-singing a work that is already in real form.

Based on the description above, the formulation of the problem in the study is as follows:

1. Is the cover of someone else's song uploaded on the Tiktok application a copyright infringement?
2. How is the legal protection for owners of songs uploaded to the Tiktok application?

RESEARCH METHODS

The method used in this research is the normative research method, namely the method of normative research, namely literature law research which refers to the legal norms contained in statutory regulations (Soekanto & Mamudji, 2006). This approach is carried out by examining all laws and regulations relating to the legal issue being handled (Marzuki, 2009). In legal research, there are several approaches, with the approach of obtaining information from various aspects of legal issues for which answers will be sought.

DISCUSSION

Forms of Copyright Infringement

Generally, copyright infringement is encouraged to seek immediate financial gain regardless of the interests of the creators and copyright holders. The actions of the perpetrators clearly violated the laws of law which stipulate that everyone can obey, respect, and respect the rights of others in civil relations, including new inventions as creations of others that are recognized as property rights by legal provisions. Legal protection for copyright works adopts an automatic protection system. This means that it is obtained by the creator automatically without going through the recording process first. The creator will automatically receive legal protection for his/her copyrighted work when the work has been translated into an expression work (Dewi, 2017).

According to Lubis (2014), the factors that influence society in violating IPR include:

1. IPR violations are committed to take shortcuts to get the maximum benefit from the violation.
2. Violators consider that the legal sanctions imposed by the courts so far have been too light and even

Juridical Analysis of Copyright Protection of Cover Songs Uploaded on the Tiktok Application

there have been no preventive or repressive actions taken by law enforcers.

3. There are some members of the community who are proud creators if their work is copied by others, but this has started to disappear thanks to the increased legal awareness of IPR.
4. By committing a violation, the tax on the product of the violation does not need to be paid to the government; and
5. The community does not pay attention to whether the goods purchased are genuine or fake (asphalt), the important thing is that they are cheap and affordable with economic capacity.

Forms of copyright infringement include taking, quoting, recording, questioning, and announcing part or all of another person's work in any way without the permission of the creator/copyright holder, contrary to law or violating an agreement. Prohibited by law means that the copyright law does not allow the act to be committed by an unauthorized person, for three reasons, but basically, if it is used for personal commercial interests and without the permission of the owner, it can be categorized as copyright infringement.

1. Harm the creator/copyright holder, for example photocopying part or all of the work of another person and then selling it to the wider community.
2. Damaging the interests of the State, for example announcing a work that is contrary to government policies in the defense and security sector or.
3. Contrary to public order and morality, for example reproducing and selling pornographic compact disc (VCD) videos.

Cover version or cover is an activity to bring/reproduce a song/music belonging to another person that has previously been recorded and performed by another singer or artist (Marzuki, 2009). Cover can also be interpreted as a performance by someone who is not the creator of the musical work the song. Including the name of the original singer in the cover version which is made for commercial purposes (bringing economic benefits) is not sufficient to avoid lawsuits from copyright holders. One must obtain permission/license from the creator/copyright holder. Based on the definition of the cover version above, it can be interpreted that the cover version is another version of a song/music work made by other people who are not the creators or singers of the song. To upload it to the Tiktok application media, one can record a cover version of the song in the form of a video without changing the original song. The legal relationship between the Tiktok application user who commits a copyright infringement and the creator whose rights are violated is an engagement that arises because of law (Siregar, 2018). As it is known that statutory regulations can be a source of engagement, as for the things that make a law the source of the engagement in question is when there is an engagement that was born from an act against the law or an act against the law. So that even though Tiktok application users who violate copyright and creators or copyright holders have never met to make an engagement and then an act against the law or illegal action occurs by the Tiktok application user, then the laws and regulations automatically become the source of the engagement of the two. In other words, the laws and regulations that give rise to the legal relationship between the two (Komardin, 2017). From

this legal relationship, the rights and obligations of both parties will arise, especially for Tiktok application users and copyright holders.

In this Tiktok application, when you are going to make a video on this application, you will first register in this application through one of the options including via Facebook, Google or Mobile Number. After finishing creating an account, you can immediately make a video through the application, at first, we are advised to select a song through the select a sound option, then the user will be directed to choose a song that has been provided by the application or a song that we can upload ourselves into the application. When finished, the user can record a video using a song that has been provided or use the song that he uploaded himself, after the video recording process is complete, the user can edit the results of the video before publishing it on the Tiktok application. The problem here is when a song that is uploaded by Tiktok application users themselves, where are the results of the song obtained whether it comes from a song issued by the copyright holder or the song comes from an unofficial site, because when anyone will use the song they must get permission from the copyright holder, then the uploaded song which was originally an original work then becomes truncated, which is done automatically from the Tiktok application. The songs used in the Tiktok application are only partially used or take only about 15 seconds of the entire song. In the Tiktok application itself, there is a choice of various kinds of songs that have been provided by the application, but not all songs are available or available on the application so that Tiktok users can enter songs of their own choice to upload to the application.

Regarding copyright infringement and copyright dispute resolution, it is regulated through Article 95 to Article 120 of Law no. 28 of 2014 concerning Copyright. Settlement of copyright disputes according to Law No. 28 of 2014 concerning Copyright can be done through arbitration (civil) or court (criminal) dispute resolution. Civil charges are submitted to the Commercial Court, meanwhile criminal charges fall under the authority of the District Court. Criminal acts based on the provisions of Article 120 of Law no. 28 of 2014 is a complaint offense (Margono, 2010).

The theory used as a tool of analysis in this research is John Locke's theory of natural law (*theory van het natuursrecht*) (Von Leyden, 1956). According to the theory of natural law, that the creator has moral rights and economic rights to enjoy the results of his work, including the profits generated from the work. The creator has the exclusive right to his work because the creator has entertained the community through his creation, the creator has the right to get an equivalent reward. This means maintaining the natural laws of the individual to supervise his works and to receive fair compensation for his contribution to society (Atmadja, 2004).

If the exclusive rights of the creator are not violated, it cannot be called a copyright infringement. Some of the exclusive rights of a copyright holder are the rights to make a copy or reproduction of the work and sell the copy, import and export the work, create derivative or derivative works of the work, display or display the work in public, sell or transfer the exclusive rights to people or other party. What is meant by "exclusive right" in this case is that only the copyright holder is free to exercise the copyright, while other people or parties are

prohibited from exercising the copyright without the consent of the copyright holder.

Music composition consists of music, including lyrics. The musical composition can be a copy of the notation or a phono record on a tape or CD. The composer is considered to be the creator of a musical composition. Meanwhile, sound recording is the result of a refinement of a series of sounds both from music, human voices and/or other sounds. Considered the creator of the sound recording is the actor/performer (in terms of performance) and/or record producer who has processed the sounds and perfected them into a final recording. So that copyright on a sound recording cannot be equated with or cannot replace copyright on the musical composition on which the sound recording is based. For cover songs which were created without rearrangement for commercial purposes, the inclusion of the original singer's name on the cover work is certainly not sufficient to avoid lawsuits from copyright holders. In order not to infringe on someone else's copyright, to reproduce, record, distribute and or publish a song belonging to someone else, especially for commercial purposes, a person needs to obtain a license. License in general can mean the granting of permission, this is included in an agreement. In music and song works, this license agreement is related to the economic rights owned by the owner or copyright holder (authorizing) of the song to obtain maximum economic benefits for their creation. The economic right itself consists of two rights, namely the right to announce songs (performing right), namely, among others, the right to play songs directly (live), play recorded songs, broadcast recorded songs (for commercial activities), and the right to duplicate songs (mechanical right) which can be the right to reproduce songs that are done mechanically and transferred to other forms, for example a cassette tape or compact disk (Marbun et al., 2013). Licenses from the creator/copyright holder include License to Mechanical Rights, and Publication Rights. WAMI (Wahana Musik Indonesia) and YKCI (Yayasan Karya Cipta Indonesia) are two of several LMK in Indonesia that are currently actively collecting and distributing royalties from the use of performing rights and to be forwarded to composers/songwriters and publishers, Article 9 paragraph (1) letter g UUHC. So, it can be emphasized that if the economic rights of a copyright are violated, such as using for commercial/business purposes of composing a song without obtaining permission from the Creator or Copyright Holder, it can be subject to sanctions in the form of imprisonment or fines according to the violation that has been committed (Gunawan & Priyanto, 2019). As for the Law No. 28 of 2014 concerning copyright article 49 paragraph (1) Temporary reproduction of a work is not considered a copyright infringement if the reproduction meets the following conditions:

1. When a digital transmission is carried out or a digital work is made in the storage media.
2. Performed by everyone with the author's permission to transmit the work; and
3. Using a tool equipped with an automatic copy deletion mechanism that does not allow the work to be reproduced

In paragraph (2) it is explained that each Broadcasting Institution can make temporary recordings without the permission of the Creator or Copyright Holder for the purpose of its activities with its own tools and facilities.

Furthermore, in paragraph (3) Broadcasting Institutions are required to destroy the temporary recording as referred to in paragraph (2) within 6 (six) months from the time of manufacture or within a longer period of time with the approval of the Author. Furthermore, in paragraph (4) it is explained that Broadcasting Institutions can make 1 (one) copy of temporary recordings which have certain characteristics for the purpose of official archives.

Legal Protection of Covered Song Owners Uploaded to the Tiktok Application

The responsibility of users of the Tiktok application to copyright holders is responsibility in moral rights and responsibility in economic rights. Moral problems arise because basically everyone respects and appreciates the work of others. Moral rights are like awards from society to creators or copyright holders because they can produce copyrighted works that will benefit society. This moral right cannot be valued in money, but it is the granting of full rights over the copyright work that is owned and no one or anyone may change the contents in full or in part of the copyrighted work (Rahma & Nurhayati, 2020). Quoting a statement from the journal Revian Tri Pamungkas & Djualeka (2019), entitled legal protection of copyright holders for songs uploaded to the Tiktok application, which was published at the Indonesian Law Symposium, published by the Faculty of Law, University of Trunojoyo Madura, related to the use of songs uploaded by application users For the Tiktok application, it can also be sued by the copyright holder or the creator, because the song uploaded by the Tiktok application user is in the full version then after being uploaded the song becomes cut and the tone of the song can also be changed. The cutting of the song that is carried out is commonly called the mutilation of the creation and changes in the tone and sound of the song or is commonly referred to as the modification of the creation which the copyright holder may not agree with the changes to the song and does not convey the meaning that should be contained in the song work.

Legal protection is all efforts to fulfill rights and provide assistance to provide a sense of security to witnesses and/or victims, legal protection of crime victims as part of community protection, can be realized in various forms, such as through the provision of restitution, compensation, medical services, and legal assistance (Soekanto, 1984).

According to Satjipto Raharjo (2000), defining legal protection is providing protection to human rights that have been harmed by others and this protection is given to the community so that they can enjoy all the rights provided by law. Philipus M. Hadjon (1987) argues that Legal Protection is the protection of dignity, as well as recognition of human rights possessed by legal subjects based on the provisions of the authority (Rahma & Nurhayati, 2020). Legal protection for copyright works adheres to an automatic protection system, which means that the author is obtained automatically, without going through the process of recording first, the author automatically has legal protection for his/her copyrighted work when the work has been translated into an expression work (Dharmawan et al, 2016). It is further explained that Law No. 28 of 2014 adopts the principle of first to use. However, the form of the work must be made in a real form (not just an idea) which is then published (Nurhayati et al., 2019).

Juridical Analysis of Copyright Protection of Cover Songs Uploaded on the Tiktok Application

Particularly regarding the protection of the rights of songwriters whose songs are covered and commercialized, there is a need for effective protection and law enforcement. In order to obtain a creation registration at the Ministry of Law and Human Rights of the Republic of Indonesia, the applicant can submit an application through three alternatives, namely:

1. Through the Directorate General of Intellectual Property Rights (Ditjen HKI).
2. Through the Regional Office of the Ministry of Law and Human Rights of the Republic of Indonesia.
3. Through a registered IP Consultant Legal Counsel

In the Tiktok application, economic responsibility when used commercially, this is done without permission so of course the copyright holder will feel disadvantaged if when the song enters the song application it will be spread on the Tiktok application, then like a song that is already famous then cut off by the Tiktok application That is, then the song is used as a promotion for the application which also benefits the Tiktok application besides that for Tiktok users who upload it to the Youtube application will be profitable.

Thus, if we refer to Article 113 of the UUHC, there are cuts and changes to the creation of songs from the Tiktok application that cause moral rights violations that are detrimental to the copyright holder of the song and it could also extend to the Economic Rights of the copyright holder. In principle, moral rights consist of rights inherent in the creator that cannot be removed (attribute right) and the right not to be changed (integrity right) and based on the explanation of the UUHC, mutilation of creation is a violation of moral rights. In the use of songs on the Tiktok application there is also a violation of Economic Rights, because the pieces of the uploaded songs or the songs used in the application can indirectly be commercialized by other users. An action can be said to be a copyright infringement if the action violates the exclusive rights of the creator or copyright holder. So that uploading and disseminating song pieces from the Tiktok application (Pamungkas & Djulaeka, 2019). The legal protection efforts carried out by the government are through:

a. Preventive Efforts

Is a preventive effort, namely, to reduce the occurrence of removing part of the song content and changing the work of uploading songs uploaded by Tiktok application users on the Tiktok application service. The purpose of this preventive effort is to prevent disputes that occur in court, there is legal protection that prevents the government from being driven to be careful in making decisions. Efforts to make preventive efforts are by registering a creation and understanding of the UUHC, while preventive efforts that can be made by the government are: increasing the power of understanding to the community through counseling and coaching actions to increase public awareness and educate law enforcers on the importance of copyright so you can find out about the sanctions that will be given if a violation occurs.

b. Repressive Efforts

Is an effort to overcome the occurrence of removing part of the song content and changing the work of uploading songs uploaded by Tiktok application users on the Tiktok application service? Repressive measures that can be made in overcoming

violations of Copyright through legal means, Repressive measures in legal protection aim to resolve disputes, handling legal protection by the General Courts in Indonesia is included in this category of legal protection. In addition, repressive measures are legal actions taken by creators and copyright holders because the work is used by other parties without the author's permission, and there are changes to the copyright work and the removal of part of the creation from the creator, so that the creator or copyright holder of the song is morals and economics. This repressive effort can be carried out in 2 (two) ways, namely civil and criminal measures. From the perspective of civil action, it can be seen through the application of article 1365 of the Civil Code which states that every act of violating the law which brings harm to others, obliges the person who due to his wrongdoing to issue the loss, to compensate the loss. In terms of criminal efforts in resolving cases of violations of music copyright violations, there are common laws (appeal and cassation) and extraordinary legal remedies (Reconsideration and Legal Interests) in terms of injustice in court decisions that are felt by one of the parties in the case (Anindya & Wiryawan, 2013). As a content creator has actually given a license to Tiktok for and authorizes Tiktok for the economic rights to our content, the terms of service have also been stated as such, in accordance with article 1 number 20 of the Copyright Law.

CONCLUSION

We must first understand the meaning of song arrangements and covers, both of them sing someone else's song, but this arrangement of someone else's song does not include copyright infringement, but the song cover is without arrangement and without the permission of the song owner and is uploaded to the Tiktok application and making a profit can be said to be an infringement of copyright, because it is for personal gain and profit. As for the legal protection given to song owners, the government has made several efforts, namely preventive and repressive measures so that content creators who use the Tiktok application have read and agreed to the terms of service and empowers Tiktok for economic rights to the content we upload.

REFERNCES

1. Anindya, F. T. M., & Wiryawan, I. W. (2013). Upaya hukum dalam penyelesaian pelanggaran dan sengketa hak karya cipta musik. *Kertha Semaya: Journal Ilmu Hukum*, 1(6), 1-4.
2. Atmadja, H. T. (2004). *Perlindungan hak cipta musik atau lagu*. Hatta Internasional.
3. Dewi, A. A. M. S. (2017). *Perlindungan Hukum Hak Cipta Terhadap Cover Version Lagu Di Youtube*. *Udayana Master Law Journal*, 6(4).
4. Dharmawan, N. K. S. (2017). Protecting Traditional Balinese Weaving Trough Copyright Law: Is It Appropriate? *Diponegoro Law Review*, 2(1), 57-84.
5. Dharmawan, N. K. S., SH, M., Wiryawan, I. W., Dunia, N. K., Darmadha, I. N., Mudana, I. N., ... & Atmadja, I. B. P. (2016). *Buku Ajar Hak Kekayaan Intelektual (HKI)*. Denpasar: Univeristas Udayana.
6. Gunawan, I., & Priyanto, I. (2019). *Perlindungan hukum karya lagu dan musik yang dibawakan oleh*

Juridical Analysis of Copyright Protection of Cover Songs Uploaded on the Tiktok Application

- wedding singer untuk kepentingan komersial. Kertha Semaya: Journal Ilmu Hukum, 6(3), 1-15.
7. Hadjon, P. M. (1987). Perlindungan hukum bagi rakyat di Indonesia: sebuah studi tentang prinsip-prinsipnya, penanganannya oleh pengadilan dalam lingkungan peradilan umum dan pembentukan peradilan administrasi negara. Bina Ilmu.
 8. Komardin, M. F. (2017). Tinjauan Yuridis terhadap tanggung jawab penyedia jasa layanan digital melalui internet yang bertindak sebagai internet intermediary di Indonesia. Thesis, Universitas Hasanuddin.
 9. Lubis, P. (2014). Perkembangan Hak Kekayaan Intelektual, Palu: Dirjen HKI dan Sentra HKI Universitas Tadulako.
 10. Marbun, T. H., Devi, T. K., & Windha, W. (2013). Perlindungan Hukum Hak Cipta Terhadap Karya Cipta Lagu dan Musik Dalam Bentuk Ringtone Pada Telepon Seluler. *Transparency Journal of Economic Law*, 1(1), 14693.
 11. Margono, S. (2010). Hukum hak cipta Indonesia: teori dan analisis harmonisasi ketentuan World Trade Organization/WTO-TRIPs Agreement. Jakarta: Ghalia Indonesia.
 12. Marzuki, P. M. (2009). Penelitian Hukum. Jakarta: Kencana.
 13. Nainggolan, B. (2011). Pemberdayaan Hukum Hak Cipta dan Lembaga Manajemen Kolektif. Alumni.
 14. Nurhayati, Y., Ifrani, I., Barkatullah, A. H., & Said, M. Y. (2019). The Issue of Copyright Infringement in 4.0 Industrial Revolution: Indonesian Case. *Media Hukum*, 26(2), 122-130.
 15. Pamungkas, R. T., & Djulaeka, D. (2019). Perlindungan Hukum Pemegang Hak Cipta Atas Lagu Yang Diunggah Pada Aplikasi Tiktok. *Simposium Hukum Indonesia*, 1(1), 394-413.
 16. Rahardjo, S. (2000). Ilmu Hukum, Bandung: Citra Aditya Bakti.
 17. Rahma, H., & Nurhayati, Y. (2020). Legalitas Cover Song Yang Diunggah Ke Akun Youtube. *Al-Adl: Jurnal Hukum*, 12(1), 77-88.
 18. Roisah, K. (2015). Konsep hukum hak kekayaan intelektual: sejarah, pengertian dan filosofi pengakuan HKI dari masa ke masa. Setara Press.
 19. Siregar, A. (2018). Tinjauan Yuridis Perlindungan Hak Cipta Atas Karya Video Bagi Pencipta Video yang Diunggah di Youtube yang di Tayangkan di Stasiun Televisi di Indonesia Berdasarkan Undang-Undang Nomor 28 Tahun 2014 Tentang Hak Cipta.
 20. Soekanto, S. (1984). Pengantar Penelitian Hukum. Jakarta: UI Press.
 21. Soekanto, S., & Mamudji, S. (2006). Penelitian Hukum Normatif: Suatu Tinjauan Singkat Jakarta: RajaGrafindo Persada.
 22. Sudjana, M. (2012). Hak Cipta sebagai Jaminan Kebendaan Bergerak Dikaitkan dengan Pengembangan Obyek Fidusia. *Mimbar Hukum-Fakultas Hukum Universitas Gadjah Mada*, 24(3), 405-417.
 23. Supramono, G. (2010). Hak Cipta dan Aspek-Aspek Hukumnya. Jakarta: Rineka Cipta.
 24. Von Leyden, W. (1956). John Locke and natural law. *Philosophy*, 31(116), 23-35.