Alter Ego of Payments Royalties for Songs and Music on Radio Stations

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***Abstract*— The requirement for radio companies to pay royalties as per government rule concerning song and or music copyright payments. According to Copyrights Act, musicians and songwriters are entitled to royalties Act. Radio companies should ask the copyright holder for permission before playing music on their station. The term "commercial" refers to radio's primary obligation to pay royalties for songs and music played on its stations. Unlike streaming music platforms, whose primary objective is to generate revenue from songs and music that are set at a specific fee (premium), radio's profit from song and music broadcasting is a matter of concern. A legal question emerges in this context: does radio, by playing songs and music, qualify as a commercial entity and, thus, be subject to royalty obligations. This article examines legal theory in relation to songwriters' rights from a theoretical standpoint. From the perspective of interpretation theory, a study will be carried out to see the limits of the sources that should provide royalties to song and music creators. Talking about the definition and categories of copyright in music, the legal structure and architecture of song and music copyright as well as a comparative analysis of US legal regulations pertaining to radio stations' duties to pay royalties for songs and music played on their air. Subject and object factors impact the network of legal binding that surrounds copyright. Although music is protected by copyright under US federal law, using music on radio does not necessitate paying royalties.**

Keywords—Copyrights; Radio; Royalty

I. INTRODUCTION

Since the Indonesia's Reformation Era in 1998, when the media industry was prodded toward capitalism through policies of commercialization, deregulation, and globalization, the country's media sector has grown at a rapid pace.

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This creates operational conflicts for the media sector. Ishadi lists the following contradictions: (1) the media's position as a tool of hegemony versus capitalist institutions; (2) the government's fair and impartial actions in support of media expansion; (3) the conflict between the need for economic liberalization principles and the desire to protect domestic (local) segments of the market; (4) The idealism of media journalists becomes a way to carry out resistance; the necessity of strong media control; and (5) the tension between the assessment of information as a corporate commodity and a media commodity.[1] In the face of rapid progress in communication and information technology, radio stands resilient as a surviving medium for communication and information dissemination.. It is required of. private radio to prioritize profits over other societal responsibilities[2]. According to the Indonesia Broadcasting Law, advertising is one of the ways that commercial radio stations make money. It is easy to assume that in order to engage listeners and increase advertising, a radio broadcasting program needs to be excellent (entertaining, educational, enlightening, etc.). Economic escalation variables that affect free trade also affect the level of standardization, including professional administration of institutions, and the fierce rivalry in the broadcasting sector. Station authorities, driven by economic considerations, cater to three primary markets: the political market, with an interest in news, current affairs, and factual programming; the popular market, looking for interesting programming; and the business market, looking for the most recent financial and investment updates[3].

The main obstacle facing broadcast radio is producing high-caliber shows that align with the target audience's demographic segmentation. There is no longer an audience or audience loyalty with the advent of the digital age. The media available to us in modern life is vast. Because of this, private radio stations need to be innovative in order to provide high-caliber content that appeals to a wide audience. Broadcasting regulator M. Syaifurrohman said that advertisers were in fact affected by changes in media consumption patterns brought about by technological advancements[4].

The radio industry is acutely aware of this, as obtaining advertising is becoming more and more challenging. In order to compete with television, print, outdoor, and online media, radio must be present. The growing rivalry among broadcast media organizations has made commercial strategies necessary for survival. Information technology is used by almost all broadcast media in their daily operations. But their audience is made up of people from diverse social and cultural backgrounds, all of whom have distinct tastes. This is an opportunity that requires further consideration. Currently, one of the most important factors in achieving the company's objectives is the design of the information system strategy, as it needs to align with the established business strategy.

Despite the advancements in information and communication technology, radio continues to be a viable option for anyone seeking pleasure and information when it comes to mass communication. It can be said that radio development has advanced quickly in tandem with the advancement of the age. Government and private radio have expanded to numerous distant parts of Indonesia under the management of Komisi Penyiaran Indonesia, also known as the Indonesian Broadcasting Commission, data from the organisation shows that there was a significant increase in the overall number of radios in 2017, with a total of 4,050. This number included 489 community radio stations, 244 public radio stations, and 3,317 private radio stations. Across Indonesia, cities typically host ten radio stations each, encompassing private, public, and community categories.

Given that the radio functions as a fundamental mass electronic communication medium, its importance is underscored. Many people can listen to radio concurrently, which allows many people to receive the information being transmitted. This privilege is demonstrated by the clear and understandable presentation of environmental issues, conservation, and global warming. Rural communities require information on a wide range of agricultural topics, such as plantations, animal rearing, and fisheries. In addition, they require amusement in the form of radio plays, songs, and other forms of music. Similarly, individuals in urban areas use radio to find the information they require. In an attempt to anticipate or avoid traffic, people who are stuck in it search for information on a congested route. In an effort to escape the boredom of sitting in traffic, they look for enjoyment by listening to music.

Radio provided a range of programming to keep its listeners entertained. As a result, radio was also selected as a medium for news, infotainment, and music programming. Based on the data pertaining to the number of radios indicated earlier, radio entertainment features a high level of intensity when songs are played virtually continuously. There is a growing need and importance for legal protection of radio song copyright owners. A songwriter's work protected by copyright law is what makes songs broadcast on the radio works that way. Songs that are played on the radio station help the radio corporation. Companies looking to run radio commercials will be drawn in by an increasing number of listeners to radio broadcasts. In the meantime, the radio play of the music should also bring in compensation for the songwriters.

In accordance with Copyrights Act, songwriters possess the right and authorization to transfer or grant permission to third parties for the reproduction of their songs or music, which includes broadcasting. Usually, a formal contract known as a licencing contract is used to formalise this authorization. In this case, the intellectual property right that the licensor possesses can be obtained and subsequently granted to the licensee via the licencing procedure. The licensed intellectual property rights could then be used by the licensee to carry out a business activity, such as producing, selling, or engaging in other specific service activities, employing innovation or expertise[5].

Government Rule Number 56 of 2021, which regulates the administration of royalties related to songs and/or music copyright, radio stations are among the entities mandated to pay royalties for original works protected by

copyright law. Copyright law bestows specific exclusive rights upon the creators of literary and artistic works, and music is a distinct category falling under its jurisdiction. Within music, "musical works" and "sound recordings" represent two separate and independent classifications that enjoy copyright protection under federal law. A sound recording is a precise rendition of a song or musical performance by a performer that has been stored on a recording media, such as an MP3 file, cassette tape, vinyl album, compact disc, or digital music platform. On the other hand, a musical work encompasses the musical composition and the accompanying lyrics created by a songwriter.

The broadcast radio business argues that music acts as free advertisement and promotion through radio broadcasts, which justifies its current statutory exemption from compensating sound recording copyright holders. According to this perspective, musicians and sound recording producers receive compensation through revenue streams such as merchandise sales, concert tickets, and sales of compact discs or MP3 music downloads. Radio broadcasters argue that the exemption reflects a robust and mutually beneficial economic relationship among the sound recording, music, and broadcasting industries. Remarkably, this relationship has remained unchanged for over 80 years, as Congress has consistently resisted altering the current performance royalty structure despite repeated requests from the recording industry.

The legal assessment conducted in this manner is expected to identify radio as the entity responsible for paying song and music royalties. Does radio, by playing songs and music, qualify as a commercial entity and, thus, be subject to royalty obligations? Based on these problems, this study needs to be carried out to determine the exact limits for the parties who should be obligated to pay royalties. For this reason, research was carried out using interpretation theory to ensure the meaning of the obligation to pay royalties for song and music copyrights by radio companies. According to the theory of interpretation put forward by F. Vaughan Hawkins, legal documents have diction that builds sentence structures in promulgated regulations. The general meaning of the chosen diction can influence the interpretation process of the meaning of the rule. In this case, the study was then developed to look at the mandate of the Copyright Act in ensuring that parties should pay royalties.

II. LITERATURE REVIEW

A sentence formed to communicate will convey the message the writer wants. Legal documents created by the government also own this component. However, the law allows the government to regulate people's behavior. In order to achieve this goal, the government must be able to formulate legal rules appropriately so that the public can comply with the applicable provisions. In order to make it easier for the public to understand things that are required or must be avoided, the government needs to create clear boundaries to create legal certainty.

The formulation of a regulation then faces a significant challenge regarding language use. If we refer to the dictionary, which is used as a reference to see the meaning of words in a language, we will find a variety of meanings for diction. Accuracy in interpreting these words can significantly impact the meaning of a sentence in a legal document. For this reason, F Vaughan Hawkins later became one of the philosophers who developed ideas about interpreting legal documents.

Through the Theory of Legal Interpretation, Hawkins guides in choosing the appropriate meaning when analyzing legal documents. The first step that must be taken in interpreting diction is to establish neutrality. This effort can be started by providing an interpretation in the most general form of a diction or sentence. This condition is an essential prerequisite so that legal documents can be adequately understood without giving too in-depth consideration to the background of the policy formulator.

Hawkins also emphasized the importance of boundaries in understanding the intention to formulate legal documents. Although it cannot be denied that intention is the basis for the formation of a regulation, this intention should have been stated clearly and firmly in the framework of the text that has been promulgated. The process of promulgating a legal document is a way to express the legislator's intentions formally. In this way, interpreting regulations must consider the chosen diction and the applicable context in interpreting the constructed series of words.

III. METHOD

This research uses normative legal research methods to analyzing all statutory regulations related to royalties and copyright. Interpretation theory is a fundamental concept in understanding the parties who should be obligated to pay royalties for copyrights for music and songs. The results of the analysis are presented in descriptive form.

IV. DISCUSSIONS AND RESULTS

The term "Hak Cipta," which is formally translated as "copyright," in Indonesian law refers to the authorship rights that the creator has developed. This word, which translates to "auteur recht" (Dutch), "droit d'auteur" (French), or "author's right," is not synonymous with copyright as it is understood in the United Kingdom[6]. On the other hand, the right to copy can be viewed as a type of copyright. However, "copyrights" are specifically defined as the

exclusive right automatically granted to the creator of a work by declaratory principle after the physical creation of the work. This definition, as outlined in Article 1 of Law Number 28 of 2014 on Copyrights, emphasizes that this exclusive right is inherent and cannot be transferred without the creator's consent, irrespective of any regulatory limitations.

Epistemologically, art, science, and literature are part of copyright. Dutch law still significantly influences the development of civil and private law in Indonesia. Personal law is part of civil law because it regulates legal relationships between legal subjects. For this reason, copyright as part of intellectual property rights can become part of this law. Apart from that, civil law in Indonesia also covers family law (familierecht), property law (vermogenrecht), and inheritance law (erfrecht).

Within the Indonesian legal system, property law is divided into two primary divisions. First, there is the law of things, often known as "zakenrecht," which governs a person's legal relationship with their property. This connection manifests as property rights. Secondly, individual rights among legal subjects are governed by the law of duties, often referred to as "verbintenissenrecht."[7] Property rights, governed by the law of things, are inherently absolute. This implies that these rights adhere to items or goods as the objects of rights, regardless of their location. In this context, properties can be differentiated based on their tangible or intangible nature, or by their mobility, distinguishing between movable and immovable property. The rights associated with movable items, such as cars, can also move with the object itself due to their attachment to it.

On the other hand, legal rights arising from creative works of art, science, industry, or literature are known as intellectual property rights, or IPRs. These rights only cover non-Manifest objects, not tangible ones where creation is possible.

Individual rights are relative, meaning that they develop as a result of social and legal relationships. For instance, in a transactional or agreement-based legal relationship involving the sale of goods, the parties involved are the buyer and the seller. Only two of these can resolve all that transpired between them. In legal theory, this private relationship is known as the contract's privacy[8].

Property rights are applicable to works that are under the copyright protection category, including novels, science fiction, music, and artistic creations. The exclusive use and control of the creative works is covered by these property rights. On the other hand, individual rights deal with the transfer of these property rights to another person via a variety of channels, such as contracts, copyright transfers, or just giving someone authorization to use the copyrighted work for performance or reproduction. This aspect of individual rights involves the legal mechanisms through which creators can manage and authorize the use of their intellectual property by others.

As to the Indonesian Law Number 28 of 2014 concerning copyrights, once the work is fixed in tangible form, the creator's exclusive rights automatically arise based on the declarative principle; no statutory regulations lessen these restrictions (see Art. 1 Section 1). The fundamental component of copyright is the author's exclusive rights, which are their exclusive authority that they alone own and that no one else may use without their permission. Remarkably, the copyright holder only retains a portion of these exclusive rights more precisely, the economic rights and they are not always the original authors (explanation of Article 4 of Copyrights Act).

Exclusive rights are defined by Carl-Bernd Kachlig and G.J. Churchill as the author's unique or distinguishing privileges, preventing third parties from using the work without permission[9]. This idea suggests a similarity to a monopoly by drawing a comparison between the holder of an exclusive right and a lone vendor in the economy. The owner of such rights holds a position akin to a monopoly because they must provide authorization before others can engage in any use of the work. In the words of British philosopher Bertrand Russell, copyright is regarded as a legal monopoly[6].

The two primary types of exclusive rights are moral rights and economic rights. Economic rights refer to the exclusive right of the author or copyright holder to be paid for their work, as stated on Copyrights Act. The copyright owner, or author, possesses various rights, including[10]:

a. Reproduction right: This entails the author's freedom to use their creation in any format and quantity.
b. Publishing rights: This involves the author's capability to make the work public by means of announcements, broadcasts, readings, and exhibitions.
c. Mechanical right: This encompasses the author's ability to use technology, specifically electricity, to duplicate or reproduce the work.

Economic rights give writers and copyright holders fantastic chances to become wealthy or gain financially. The economic rights that the author may exercise are governed by Copyrights Act, Article 9:

a. The release of a piece of work.
b. Copying a piece of work in any format.
c. Work translation;
d. Work adaptation, arrangement, or transformation;
e. Work distribution or copy;
f. Work performance;
g. Work announcement;
h. Work communication; and

i. Work rental.

It's noteworthy that even when copyright or related rights are transferred, writers and performers have inalienable moral rights that cannot be taken away or erased for any reason. Moral rights are meant to ensure that everyone acknowledges and values the author's work. There are various rights included in moral rights, including[11]:

a. Paternity right: The author's right to have their name associated with the work.
b. Integrity right: The creator's ability to preserve the honor and integrity of their work to protect their reputation.
c. Right of disclosure: The creator's choice regarding whether or not to make their work public.
d. Right to withdraw: The ethical prerogative of the author to take their work out of publication.

It's important to note that, as per the same law, moral rights cannot be transferred while the author is still alive. However, these rights can be exercised after the author's death, subject to the requirements of the legislation and any provisions in a will or other relevant documents.

The transmission and defense of an author's rights are affected by distinctions between moral and economic rights. Authors have the option to sell their economic rights if they so want, but moral rights are immutable and unaffected by time due to the paternal right.

According to Copyrights Act, an individual who meets the conditions outlined in Article 1 Sections 1, 2, and 3 is eligible to become a songwriter. The copyright holder, typically the author of music or songs, establishes a legal connection with a sound recording corporation through a formal agreement known as a license agreement. This agreement enables others to enjoy the songs created by the copyright holder.

The foundation for copyright protection laws, requiring a license or authorization, is rooted in the principles set forth in Law No. 28/2014, particularly in Article 9 Sections 2 and 3. These parts make it clear that permission from the author or copyright holder is required in order to exercise economic rights. As a result, it is against the law for anyone who isn't granted permission by the author or copyright holder to duplicate and/or utilise a work for profit. Article 81 is linked to Article 80 Section 1, which restates the copyright holder's authority.

Law Number 28 of 2014 on Copyrights, on the other hand, defines a licence as a written permission given to another party by the owner of a copyright or related rights, permitting the implementation of economic rights for their creation or product subject to specific limitations (see Art. 1 Section 20 of Law Number 28 of 2014 on Copyrights). According to Art. 1 Section 4 of Law Number 28 of 2014 on Copyrights, the parties holding copyrights in this context are the author as the legitimate owner, those who lawfully acquired the right from the author, and any other parties that acquired additional rights from the original owner.

Sound record labels are considered copyright holders under Copyrights Act, have the legal authority to exercise the economic rights of songwriters. This includes actions such as recording, duplicating, distributing, and marketing the songs created by the songwriters (refer to Section 1 on Copyrights, Article 9 of Copyrights Act). In this relationship, the record label also assumes the role of a producer, covering all expenses associated with the production process and making payments to the songwriter for the utilization of economic rights.

The collaboration between sound record corporations and songwriters is primarily driven by business and economic considerations. To gain financial benefits, songwriters or copyright holders transfer their economic rights to the record label. In turn, Record companies use music for commercial purposes in order to make money from a variety of sources or payments (see Art. 1 Section 24 of Copyrights Act).

Therefore, if music is utilised commercially, the user must not only seek permission but also pay royalties to the artist or copyright holder for the use of the work's economic rights. When it comes to licencing laws, the record label is considered the licensee and the creator, according to their legal standing, is the licensor[12]. The content of the license is determined through an agreement between the parties, specifying the duration of the license and the royalty amount, among other details, provided that it complies with applicable laws and fairness standards (see Art. 80 Sections 3, 4, and 5 of Copyrights Act).

As producers, sound record labels should truly be expected to invest in the overall sales of songs or recorded music. It seems sense that the record business selects and determines which songs to record in a professional manner. What is meant by benchmarks or criteria is whether or not the songs are marketable an economic phrase for being able to be sold.

Music recording producers meticulously plan every aspect of the process, covering everything from initial planning to the actual recording of songs, their subsequent release, and the promotion or selling of music recordings. As producers of songs, sound recording companies move beyond the stage of songwriting and actively release the recorded songs to the public via a variety of media, such as broadcast radio and television as well as live performances. Within this framework, the record label forges a connection with a radio station, facilitating the dissemination of recorded songs to a wider audience through radio broadcasts. This collaboration helps in promoting and popularizing the music produced by the sound recording company[13].

When new music hits the scene, radio stations strive to keep their playlists updated with current music to keep listeners interested. Radio play of new songs is considered a form of promotion or advertisement, based on the interests of the sound recording firm. Under these circumstances, it is reasonable to assume that mutual reliance is necessary for the sound record firm and radio corporation to continue operating together. Even nevertheless, the

audio record company's actions demonstrated that they gave the radio station the new songs and music to play, regardless of whether this was lawful[14].

A provision in the recording company's and songwriter's license agreement needs to be examined in this regard. A record business may be granted nine different types of economic rights by the creator under Article 9 Paragraph 1 of the Copyright Law.

Government Rule Number 56 of 2021, which oversees the administration of song and/or music copyright royalties, stipulates that in the context of a license agreement, the songwriter retains the flexibility to specify the content of sections related to reproductive rights or exclusively reproductive rights. Consequently, sound record labels do not have the authority to grant radio stations permission to play the author's song for profit unless the agreement explicitly includes a provision directing the promotion and distribution of the songwriter's songs. In such cases, the record label is empowered to permit the radio station to utilize the songs for profit, aligning with the terms outlined in the agreement.

According to the director of (Kidung Indah Selaras Suara (Kiss FM) radio station, Songwriters who are legally associated with radio firms typically do so because they have granted the record company permission to copy or replicate their work. In the meantime, the songwriter will handle distribution and sales on his own. Simultaneously, the public can now purchase recording equipment due to the development and innovation of sound recording technology at reasonable costs. It inspires musicians and composers to record their songs and offer them straight to their fan base[14].

Federal law in the United States acknowledges that music is protected by copyright, but it does not demand royalties when using music on radio. In August of 2010, the Government Accountability Office (GAO) issued a special report that looked at the advantages that the radio and music industries now have.

According to the GAO, the broadcast radio sector is benefiting from its partnership with the recording industry. Specifically, these benefits include the use of sound recordings to draw listeners, which will boost commercial radio stations' revenue from advertising. Commercial radio stations mostly rely on advertising for funding, and their $225,000 average yearly revenue is more than that of radio stations.

The proposed performance rights act will result in additional costs for broadcast radio stations and additional revenue for record companies, musicians, and performers (U.S. Government Accountability Office, GAO-10-862, Telecommunications (2010)

Democratic Party Fraction: Ted Kennedy, John Conyers Jr., and Jerrold Nadler the "Fair Play, Fair Pay Act of 2015," which was introduced by Republican Rep. Marsha Blackburn and Democratic Leader Ted Deutch, would require terrestrial radio stations to pay Copyright holders for their radio broadcasts, much like internet and satellite radio do. This further calls for royalties for music recorded prior to 1972 must be paid by all radio formats.

The Fair Play Act (HR 1733) would do away with the distinctions that currently exist between certain AM/FM, cable, and satellite radio services and their license requirements. need to provide copyright holders with royalties. The legislation would create a more robust and widely accessible sound recording performance for all parties involved in music transmission, irrespective of whether the song is delivered digitally, analog, or other formats. Additionally, HR 1733 would change the Copyright Act's section 144 to permit radio stations to license the broadcast of music (National Association of Broadcasters).

The regulation allows $500 annually to be paid by small commercial providers, who are satellite radio personalities with yearly revenues under $1 million. Public broadcasters are required to pay $100 in royalties each year. There is no requirement to pay royalties for the transmission of services in houses of worship or religious gatherings. There are no royalties associated with the usage of incidental sound recordings.

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V. CONCLUSION

The protection of music copyrights on the radio is contingent upon acquiring permission or a licence through a written agreement, as per Copyrights Act and Government Rule which managing song and/or music copyright revenues. If there is no documented contract or author consent, a copyright infringement claim may be supported. The legal framework for song copyright protection is organised on interactions between legal subjects in line with Copyrights Act. A minimum of three relevant legal subjects are at play: the Music Licence Agreement, the Legal Arrangement between the Sound Recording Company and the Radio Corporation, and the Legal Arrangement between the Songwriter and the Radio Company. The protection of music copyrights on the radio is based on these legal connections, highlighting the importance of written agreements and licences to prevent copyright infringement.

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