

Research Article

Evaluation of the Trans Halim City Transportation Business Activity Policy, Puskopau Unit, Halim Perdana Kusuma Jakarta, in the Perspective of Public Policy and Law Number 5 of 1999

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Abstract. This study aims to evaluate the public policy of Trans Halim city transportation business activities managed by the Air Force Cooperative Center (PUSKOPAU) at Halim Perdana Kusuma Airport, Jakarta, in the perspective of public policy theory and Law Number 5 of 1999 on the Prohibition of Monopolistic Practices and Unfair Business Competition. Using empirical juridical research with a socio-legal approach combined with policy evaluation frameworks including the Dunn model and CIPP evaluation approach, this study examines the alignment between PUSKOPAU's territorial-based business operations and the regulatory mandates of Indonesian competition law. Field observations and interviews conducted with drivers, management, and transportation organization representatives confirm that PUSKOPAU operates as a sole provider on specific routes within and around the Halim Perdana Kusuma military complex, constituting indicators of natural monopoly behavior. The study applies rule of reason analysis and public interest theory to assess whether such monopolistic conditions are justified by cooperative law exemptions under Article 50(i) of Law No. 5/1999. Findings reveal that while PUSKOPAU's operations serve member welfare objectives consistent with cooperative law, the extension of services to the general public creates a legal grey area, particularly given the absence of KPPU regulatory guidelines for cooperative exemptions. This legal gap produces significant policy uncertainty and hampers effective enforcement. The article recommends that KPPU promptly formulate specific guidelines for cooperative monopoly exemptions and that formal KPPU investigation procedures be initiated to determine the legality of PUSKOPAU's market dominance.

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1. Introduction

Transportation policy constitutes a foundational pillar of urban governance, economic circulation, and national integration. In the context of public policy theory, transportation provision is both a public good and a regulatory domain where state actors, private operators, and cooperative enterprises compete for legitimacy and market share (Dye, 2013; Easton, 1965). Jakarta's urban transportation landscape has undergone substantial transformation with the emergence of integrated systems such as Jak-Lingko, yet micro-scale operators such as Trans Halim Unit PUSKOPAU remain understudied despite their enduring socioeconomic role (Nugroho, 2020).

Trans Halim is a city angkot (minibus) operated by the Air Force Cooperative Center (PUSKOPAU Halim Perdana Kusuma). Established in 1975, it serves routes connecting the Halim Perdana Kusuma Air Force Base with surrounding civilian areas, particularly along the Cililitan Besar corridor toward UKI intersection. As the sole operator on these routes, PUSKOPAU's operations raise significant questions under Indonesia's antimonopoly framework, particularly Law Number 5 of 1999 on the Prohibition of Monopolistic Practices and Unfair Business Competition (Hermansyah, 2009).

From a public policy evaluation perspective, this case presents an instructive nexus between regulatory intent, cooperative law, military enterprise reform, and market access. The framework of Law No. 5/1999, modeled on principles of effective competition (rule of reason) and consumer protection, establishes Article 17 prohibitions on market dominance while simultaneously carving out exemptions for cooperatives under Article 50(i) (Suhastri & Makara, 2010). The tension between these provisions, compounded by the absence of KPPU (Business Competition Supervisory Commission) guidelines for cooperative monopoly cases, creates a legal vacuum with concrete policy implications.

Numerous scholars have analyzed monopolistic practices in Indonesian transportation, particularly in airport taxi services (Arba, 2015; Darmawanto, 2017), but the specific dynamics of military cooperative transport operations remain relatively unexplored in the academic literature. This article seeks to fill that gap by applying a systematic policy evaluation framework—drawing on Dunn's (2014) stages model, the CIPP (Context, Input, Process, Product) evaluation approach (Stufflebeam, 2000), and Anderson's (2014) public policy process theory—to assess the design, implementation, and outcomes of PUSKOPAU's transportation policy within the Indonesian competition law framework.

The research questions guiding this study are: (1) How does PUSKOPAU's territorial business model align with the objectives and provisions of Law No. 5/1999? (2) To what extent do cooperative law exemptions justify observed market dominance? (3) What policy recommendations are appropriate given the identified regulatory gaps?

2. Literature Review

Public Policy Theory and Evaluation Frameworks

Public policy is broadly understood as a course of action or inaction chosen by public authorities to address a problem or an interrelated set of problems (Anderson, 2014). Dye (2013) defines it as whatever governments choose to do or not to do, emphasizing both action and deliberate inaction as policy positions. In the Indonesian context, Nugroho (2020) situates transportation policy within the broader paradigm of developmental public administration, where state institutions retain significant control over market access.

Policy evaluation constitutes the systematic assessment of the design, implementation, and outcomes of public programs (Dunn, 2014). The CIPP model developed by Stufflebeam (2000) provides a comprehensive framework encompassing context evaluation (need identification), input evaluation (resource adequacy), process evaluation (implementation fidelity), and product evaluation (outcome achievement). Applied to transportation policy, this model enables a structured analysis of whether PUSKOPAU's cooperative transport

program meets the needs of its intended beneficiaries while remaining consistent with regulatory requirements (Vedung, 1997).

Additionally, Weimer and Vining (2017) emphasize policy analysis as a client-oriented advisory process aimed at producing recommendations for policy improvements, a normative dimension that informs the prescriptive section of this article. Howlett and Ramesh (2003) further note that policy instrument selection—whether regulatory, market-based, or cooperative—determines both the effectiveness and legitimacy of policy outcomes.

Competition Law and Monopoly Theory

Law Number 5 of 1999 constitutes Indonesia's primary antimonopoly statute, prohibiting conduct that leads to monopolistic practices and unfair business competition. Article 17(1) prohibits business actors from dominating production or marketing of goods and services that may result in monopolistic practices or unfair competition. Article 17(2) establishes presumptive indicators of monopoly, including the absence of substitutes and control of more than 50 percent of relevant market share (Fahmi et al., 2017).

The scholarly literature distinguishes between natural monopoly—arising organically from geographic, technical, or scale conditions—and manufactured monopoly, which results from anticompetitive conduct (Posner, 2001). In natural monopoly settings, Viscusi, Harrington and Vernon (2005) argue that regulatory intervention should focus on consumer protection and access rather than structural remediation. This distinction is particularly relevant to PUSKOPAU, whose territorial dominance appears to emerge from historical, geographic, and institutional factors rather than deliberate exclusionary strategy.

The rule of reason approach, endorsed by the U.S. Supreme Court and adapted in Indonesian competition law, allows courts and regulators to consider whether a business restriction actually harms competition, weighing its pro-competitive and anticompetitive effects (Gellhorn, Kovacic & Calkins, 2004). Menurut Suhasril dan Makarao (2010), this approach provides the analytical flexibility needed for nuanced assessments of cooperative enterprises operating in geographically constrained markets.

Cooperative exemptions from competition law reflect a global policy judgment that cooperative enterprises, oriented toward member welfare rather than profit maximization, may appropriately restrict competition in limited circumstances (Chloupkova, Svendsen & Svendsen, 2003). European competition law, for instance, recognizes functional cooperatives as distinct from commercial undertakings when their activities remain genuinely ancillary to member interests (Odudu, 2006). Indonesia's Article 50(i) embodies a similar principle, though its precise scope remains undefined by regulatory guidance.

Military Enterprise and Cooperative Law in Indonesia

The historical entanglement of Indonesian military institutions with commercial enterprises is well-documented (Djuyandi, 2016; Nurhasim, 2008). Law Number 34 of 2004 on the National Armed Forces explicitly prohibits active military personnel from engaging in business activities under Article 39, while Article 76 mandates government takeover of existing military businesses within five years of enactment. However, the law applies specifically to individual service members, leaving institutional cooperatives in a legal grey zone (Djuyandi, 2016).

Cooperative law under Law Number 25 of 1992 on Cooperatives directs cooperative enterprises primarily toward member welfare and directly related economic activities (Article 43). The intersection of cooperative law, military enterprise reform, and competition regulation creates the complex regulatory environment in which PUSKOPAU operates. Wahyudi (2010) observes that Indonesian military cooperatives have historically exploited jurisdictional ambiguities to maintain commercial operations nominally serving member welfare while effectively functioning as public-facing enterprises.

3. Method

This study employs an empirical juridical research design, combining doctrinal legal analysis with socio-legal field inquiry (Marzuki, 2010). The empirical dimension encompasses primary data collected through semi-structured interviews with key informants including: (1) Mayor (Ret.) Sasar Maidar, former manager of Trans Halim Unit PUSKOPAU; (2) three active Trans Halim drivers (Subur, Mad Sanen, and Agus); and (3) a representative of the Land Transportation Organization (ORGANDA) DKI Jakarta Province. Field observations were conducted along Trans Halim routes in Cililitan and within the Halim Perdana Kusuma complex.

Secondary data sources include official documents such as Jakarta provincial bus registration data (2019), statutory instruments encompassing Laws No. 5/1999, No. 25/1992, No. 34/2004, No. 22/2009, Government Regulation No. 74/2014, and Ministry of Transportation Regulation No. 15/2019, as well as academic literature and KPPU regulatory guidelines.

The policy evaluation framework integrates Dunn's (2014) multi-criteria evaluation approach assessing effectiveness, efficiency, adequacy, equity, responsiveness, and appropriateness of the policy. The analysis also draws on the CIPP evaluation model (Stufflebeam, 2000) and Bardach's (2012) practical policy analysis framework. Legal analysis proceeds through the rule of reason methodology endorsed by KPPU Regulation No. 11 of 2011 on the Guidelines for Article 17 (Monopolistic Practices).

4. Results and Discussion

Institutional Profile and Operational Context of PUSKOPAU

PUSKOPAU Halim Perdana Kusuma was established on July 3, 1970 under Legal Entity No. 885/BH/1/70 as a unit within the Air Force Cooperative system (INKOPAU). It operates under the hierarchical cooperative structure of the Indonesian Air Force, with the parent organization INKOPAU established on August 15, 1959. The cooperative's primary mandate is member welfare, particularly for retired Air Force personnel residing in and around the Halim Perdana Kusuma complex.

Trans Halim Unit PUSKOPAU operates a fleet of 96 registered microlet vehicles (DKI Jakarta Bus Data 2019) serving four primary routes: (1) Lubang Buaya–UKI (Jak-Lingko route JAK-20); (2) Cililitan–Dwikora Complex (JAK-21); (3) Kampung Pulo–UKI (JAK-75); and (4) Trikora–Dwikora (JAK-22). These routes collectively connect the interior of the Halim Perdana Kusuma military complex with key civilian transport nodes. Since 2018, four routes have been integrated into the PT. TransJakarta Jak-Lingko program as feeder microtransit services.

From a context evaluation perspective (Stufflebeam, 2000), PUSKOPAU's transportation service addresses a genuine and persistent community need: the geographic isolation of residents within a large military complex with limited access to external public transportation. The cooperative structure enables retired military personnel to participate as vehicle owners and shareholders, consistent with the welfare orientation mandated by Law No. 25/1992. However, the extension of services to the general public—including civilian residents, students, and workers commuting through the Cililitan corridor—significantly expands the operational scope beyond strict member-welfare boundaries.

Market Structure Analysis: Natural Monopoly Indicators

Application of Article 17(2) criteria to PUSKOPAU's operations reveals significant monopoly indicators. First, no alternative city transportation operators serve routes within the Halim Perdana Kusuma complex, confirming the absence of direct substitutes for intra-complex transportation. Second, PUSKOPAU controls effectively 100 percent of the relevant market—city angkot services on routes from Cililitan Besar to the interior of the Halim complex—satisfying the 50 percent market share threshold of Article 17(2)(c). Third, interviews with route drivers confirm that no other transportation cooperatives or companies operate competing services on these specific routes.

These findings align with natural monopoly theory as articulated by Viscusi et al. (2005), wherein single-firm provision emerges as economically rational when service territory characteristics—particularly the restricted-access military zone—preclude effective multi-operator competition. The territorial approach (*pola kewilayahan*) acknowledged by PUSKOPAU management represents an institutionalization of this natural constraint into an explicit operational strategy that creates entry barriers for potential competitors.

Following the rule of reason framework endorsed by KPPU Regulation No. 11/2011, the evaluation proceeds through four analytical stages: (1) relevant market definition; (2) proof of monopoly position; (3) identification of monopolistic practices and their competitive effects; and (4) assessment of exploitation impacts on transaction partners. At stages one and two, PUSKOPAU clearly demonstrates monopoly position. At stages three and four, the evidence is more nuanced: consumer interviews suggest satisfaction with service quality and pricing, and no evidence of predatory pricing or explicit exclusionary conduct was identified. This suggests a natural rather than manufactured monopoly, with welfare implications falling short of the consumer harm criterion central to antitrust enforcement (Gellhorn et al., 2004).

Cooperative Exemption Under Article 50(i): Legal Tensions

Article 50(i) of Law No. 5/1999 exempts cooperative activities specifically aimed at serving their members from antimonopoly provisions. The legislative history indicates this exemption was designed to promote the people's economic system (*ekonomi kerakyatan*) integral to Indonesia's economic constitution (Yuhassarie et al., 2005). However, the exemption's scope is strictly bounded by the phrase 'specifically aimed at serving members' (*secara khusus bertujuan untuk melayani anggotanya*).

Interview evidence reveals that PUSKOPAU's transportation services are explicitly open to the general public, including non-member civilians, students, and workers along the

Cililitan Besar corridor. Mayor (Ret.) Sasar Maidar confirmed that the cooperative 'engages with the surrounding community to provide services reaching into the Halim complex.' Vehicle drivers further noted that no distinctions are made between member and non-member passengers. This constitutes a *prima facie* departure from the strict member-only orientation required by the Article 50(i) exemption, as confirmed by the legislative explanation requiring services to be limited to 'members and not to the general public.'

This legal tension reflects a broader pattern identified by Wahyudi (2010) in Indonesian cooperative governance: the instrumentalization of cooperative legal form to achieve operational objectives—including revenue generation from public markets—that exceed the cooperative's constitutionally intended scope. From a public interest theory perspective (Stigler, 1971), this pattern may also reflect regulatory capture dynamics wherein the military-affiliated cooperative benefits from institutional protection not available to commercial operators.

Regulatory Gap: Absence of KPPU Guidelines for Article 50(i)

A critical finding of this study is the absence of KPPU regulatory guidelines for Article 50(i)—the cooperative exemption provision. KPPU has issued guidelines for several Article 50 exceptions including intellectual property rights agreements (KPPU Regulation No. 2/2009), franchise agreements (KPPU Regulation No. 6/2009), small business exemptions (KPPU Regulation No. 9/2009), and general exemptions under Article 50(a) (KPPU Regulation No. 5/2009) and Article 50(d) (KPPU Regulation No. 7/2010). However, no guideline exists specifying which types of cooperatives qualify for monopoly exemption under Article 50(i) or what conditions must be satisfied for the exemption to apply.

This regulatory gap produces three distinct policy pathologies identified in Dunn's (2014) evaluation framework. First, an effectiveness deficit: without clear criteria, enforcement authorities cannot systematically identify whether cooperative enterprises have exceeded the exemption's boundaries. Second, an equity problem: commercial transportation operators competing with PUSKOPAU operate under full antimonopoly scrutiny while the cooperative may invoke unvalidated exemption claims. Third, a responsiveness failure: the absence of guidelines leaves affected parties—including competing operators, consumers, and the cooperative itself—without reliable guidance on permissible conduct.

The legal uncertainty thus generated is antithetical to the rule of law principle in Hans Kelsen's normative theory, which requires that legal rules be clear, stable, and consistently applicable (Marzuki, 2008). As Howlett and Ramesh (2003) observe, regulatory instrument design that fails to specify operational boundaries produces compliance unpredictability and enforcement arbitrariness, ultimately undermining the policy objectives the regulation was designed to achieve.

Policy Evaluation: CIPP Assessment

Applying the CIPP evaluation model (Stufflebeam, 2000) to PUSKOPAU's transportation policy yields the following assessment. At the context level, the policy appropriately targets a genuine transportation need in an underserved geographic area with limited alternative access. The cooperative delivery mechanism aligns with Indonesian

economic ideology and serves legitimate member welfare objectives. However, contextual justification weakens as services expand beyond the military complex into general public markets.

At the input level, resource mobilization is efficient: vehicle capital is contributed by retired military personnel as member-investors, and Jak-Lingko integration provides government subsidy for fuel and driver compensation. Driver interviews confirmed daily fuel allocations of IDR 160,000, monthly wages of IDR 2,800,000 (paid bimonthly), and daily meal allowances of IDR 50,000 under the Jak-Lingko program. These inputs suggest a well-resourced and institutionally supported operation.

Process evaluation reveals adequate operational discipline: GPS monitoring, mandatory stop compliance, five-minute departure schedules regardless of passenger load, and CCTV-enforced conduct standards distinguish Trans Halim from less regulated operators. Fleet renewal requirements every five years (with Jak-Lingko mandating vehicles under three years old) maintain service quality standards.

At the product level, consumer satisfaction appears generally high, with reported adequate service frequency, comfortable vehicles, and competitive pricing (IDR 5,000 full fare, IDR 3,500 Jak-Lingko rate). However, measured against the competition policy objectives of Law No. 5/1999—promoting fair market competition, protecting consumer choice, and preventing market concentration—the product evaluation is less favorable. The absence of competing operators, while not demonstrably harmful to current consumers, structurally limits future consumer options and deters market entry by potentially more efficient operators.

5. Conclusion

This study has demonstrated that PUSKOPAU Halim Perdana Kusuma's city transportation operations exhibit natural monopoly characteristics within the meaning of Article 17(2) of Law No. 5/1999, meeting both the market dominance threshold and the absence-of-substitutes criterion. The cooperative's territorial business model creates effective entry barriers for competing operators, constituting indicators of natural monopoly by design and geography.

The cooperative exemption under Article 50(i) provides a potential legal defense, but its applicability is undermined by PUSKOPAU's acknowledged service to the general public rather than exclusively to members. The current regulatory framework, characterized by the absence of KPPU guidelines for Article 50(i), produces significant legal uncertainty that benefits neither the cooperative, its competitors, nor regulatory authorities.

From a public policy evaluation standpoint using CIPP and Dunn's frameworks, PUSKOPAU's transportation program achieves satisfactory context, input, and process evaluation scores, but falls short of competition policy objectives at the product evaluation stage. The Jak-Lingko integration partially addresses access equity concerns but does not resolve the underlying market dominance question.

This study recommends: (1) KPPU should urgently issue specific regulatory guidelines for Article 50(i), delineating the types of cooperatives and conditions qualifying for monopoly exemptions, to fulfill the legal certainty mandate of Kelsen's normative theory; (2) KPPU should initiate formal investigation proceedings under Article 36 of Law No.

5/1999 to determine whether PUSKOPAU's operations constitute permissible natural monopoly or actionable monopolistic practice; (3) PUSKOPAU should institutionally clarify the member-public service boundary to preserve its cooperative exemption claim; and (4) local transportation authorities should develop a competitive route licensing framework for the Halim corridor that accommodates cooperative services while permitting regulated entry by other operators.

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References

- Anderson, J. E. (2014). *Public Policymaking: An Introduction* (8th ed.). Cengage Learning.
- Arba, R. (2015). *Praktek Monopoli Taksi Puskopau Di Wilayah Bandara SSK II Pekanbaru Ditinjau Dari Undang-undang Nomor 5 Tahun 1999 Tentang Praktek Anti Monopoli Dan Persaingan Usaha Tidak Sehat*. Skripsi, Universitas Islam Negeri Sultan Syarif Kasim.
- Bardach, E. (2012). *A Practical Guide for Policy Analysis: The Eightfold Path to More Effective Problem Solving* (4th ed.). CQ Press.
- Chloupkova, J., Svendsen, G. L. H., & Svendsen, G. T. (2003). Building and destroying social capital: The case of cooperative movements in Denmark and Poland. *Agriculture and Human Values*, 20(3), 241–252. <https://doi.org/10.1023/A:1026141807305>
- Darmawanto, S. (2017). Implementasi Persaingan Usaha Tidak Sehat Jasa Transportasi di Bandara Sultan Syarif Kasim II Pekanbaru. *Jurnal JOM Fakultas Hukum*, IV(1), 1–15.
- Djuyandi, Y. (2016). Pengawasan DPR-RI Dalam Bisnis Militer Sebagai Bagian Dari Reformasi Tentara Nasional Indonesia (TNI). *Jurnal Wacana Politik*, 1(1), 79–92. <https://doi.org/10.24198/jwp.v1i1.11052>
- Dunn, W. N. (2014). *Public Policy Analysis: An Integrated Approach* (5th ed.). Routledge.
- Dye, T. R. (2013). *Understanding Public Policy* (14th ed.). Pearson Education.
- Easton, D. (1965). *A Framework for Political Analysis*. Prentice-Hall.
- Fahmi, A., Adnan, H., Kamal, H., Toha, S., & Maulana, A. (2017). *Hukum Persaingan Usaha*. Komisi Pengawas Persaingan Usaha.
- Gellhorn, E., Kovacic, W. E., & Calkins, S. (2004). *Antitrust Law and Economics in a Nutshell* (5th ed.). West Academic Publishing.
- Hermansyah. (2009). *Pokok-Pokok Hukum Persaingan Usaha di Indonesia* (2nd ed.). Kencana.
- Howlett, M., & Ramesh, M. (2003). *Studying Public Policy: Policy Cycles and Policy Subsystems* (2nd ed.). Oxford University Press.
- Marzuki, P. M. (2008). *Pengantar Ilmu Hukum*. Kencana.
- Marzuki, P. M. (2010). *Penelitian Hukum* (4th ed.). Kencana.
- Nugroho, R. (2020). *Kebijakan Publik Indonesia: Proses, Analisis dan Partisipasi*. Pustaka Pelajar.
- Nurhasim, M. (2008). Dilema Menata Bisnis TNI. *Jurnal Lembaga Ilmu Pengetahuan Indonesia*, 18 May 2008.
- Odudu, O. (2006). The Boundaries of EC Competition Law: The Scope of Article 81. Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780199287185.001.0001>
- Posner, R. A. (2001). *Antitrust Law* (2nd ed.). University of Chicago Press.
- Stigler, G. J. (1971). The theory of economic regulation. *Bell Journal of Economics and Management Science*, 2(1), 3–21. <https://doi.org/10.2307/3003160>

- Stufflebeam, D. L. (2000). The CIPP Model for Evaluation. In D. L. Stufflebeam, G. F. Madaus & T. Kellaghan (Eds.), *Evaluation Models: Viewpoints on Educational and Human Services Evaluation* (2nd ed., pp. 279–317). Kluwer Academic Publishers. https://doi.org/10.1007/0-306-47559-6_16
- Suhasril & Makarao, M. T. (2010). *Hukum Larangan Praktik Monopoli dan Persaingan Usaha Tidak Sehat di Indonesia*. Ghalia Indonesia.
- Vedung, E. (1997). *Public Policy and Program Evaluation*. Transaction Publishers.
- Viscusi, W. K., Harrington, J. E., & Vernon, J. M. (2005). *Economics of Regulation and Antitrust* (4th ed.). MIT Press.
- Wahyudi, T. (2010). Military Business in Post-New Order Indonesia: Theoretical and Empirical Perspectives. *Journal of Southeast Asian Studies*, 41(2), 315–340.
- Weimer, D. L., & Vining, A. R. (2017). *Policy Analysis: Concepts and Practice* (6th ed.). Routledge.
- Yuhassarie, E., Harnowo, & et al. (2005). *Rangkaian Loka Karya Terbatas Masalah-Masalah Kepailitan Dan Wawasan Hukum Bisnis Lainnya*. Pusat Pengkajian Hukum.