

# Criminal Liability For Dolus and Negligence of Fiber Optic Cable Operators That Result in Accidents

Deden Ridwan<sup>1\*</sup>, Moh. Lubsu Tuqo Ramadhan<sup>2</sup>

<sup>1,2</sup> Muhammadiyah Cyber University, Indonesia

\*Corresponding Author:

Email: [deden20220600043@sibermu.ac.id](mailto:deden20220600043@sibermu.ac.id)

---

## Abstract.

*This study examines the criminal liability of fiber optic operators for intentional and negligent acts that harm the public. The main focus is on how positive law and the harmonization of the criminal justice system regulate this responsibility. This research uses a legislative, case, and comparative approach within the framework of normative legal methods. All legal materials (primary, secondary, and tertiary) are analyzed qualitatively to answer the legal issues raised. In addition to providing compensation. The research findings reinforce the existence of negligence by the fiber optic network operator as a corporate entity, whether committed intentionally (dolus) or due to structural negligence (culpa), resulting in legal liability for damage to public facilities in the form of dysfunction of public infrastructure. Business actors sometimes benefit from the crimes they commit, so it is considered unfair to impose criminal sanctions on operators. As the regulator of regional development, local governments also bear responsibility for every policy issued. On the other hand, the restorative justice approach through criminal mediation remains relevant to be integrated into various models of law enforcement. This requires comprehensive harmonization in the criminal justice system—substantively, structurally, and culturally—to be in line with the values of justice in positive law.*

**Keywords:** *Fiber optic; criminal liability and criminal justice system.*

---

## I. INTRODUCTION

The rapid development of telecommunications technology in this modern era is driven by the high intensity of the public's need for access to information, thus encouraging communication technology industry players to improve services both in terms of signal coverage quality services and data security in accordance with the sense of fulfilling customer satisfaction. The urgency of telecommunications infrastructure security demands optimal fiber optic network management from the central or regional government, while companies are required to prioritize aspects of comfort, safety, and aesthetics to prevent the recurrence of incidents that harm the public. Accidents caused by dangling fiber optic cables still occur frequently and often result in loss of life, one of which has attracted attention is that of Sultan Rifat Alfatih. The consequences of this incident have made us aware of the vital role of fiber optics in the Industry 5.0 era, which requires safe and aesthetic infrastructure design, as well as strict enforcement of criminal liability for operators to prevent further loss of life. Various judges' decisions in fiber optic cases have been mapped across the legal landscape. For example, Decision Number 2/Pid.Sus/2020/PN.Tbk, the Tanjung Balai Karimun District Court ruled that Djunaidi Tan was proven to have committed a telecommunications crime, in the form of physical and electromagnetic interference to the telecommunications system on an underwater network. Therefore, the defendant was found to have violated Article 55 in conjunction with Article 38 of Law No. 36 of 1999 for actions that harmed the telecommunications infrastructure.

For the crime that caused telecommunications dysfunction, the perpetrator was sentenced to three months' imprisonment and an administrative fine of Rp. 500 million. Budi Arie Setiadi observed the fiber optic problem by asking the regional government to be able to regulate and manage field conditions where the fiber optic network harms victims, because of regulations and city planning, which are regulated by the regional government. Trubus Rahardiansyah emphasized the opinion that victims of optical cables deserve to demand recovery costs from the corporation that owns the infrastructure. The operator's efforts to tidy up the cables do not necessarily eliminate the obligation to compensate the victim or the potential for criminal sanctions for the error that has occurred. Research on accidents related to fiber optics has previously been

conducted by Utari Dewi with the journal title, "Civil Liability in the Installation of Fiber Optic Cable Networks in Salatiga City" with a focus on civil liability, with a focus on civil liability. Meanwhile, for this journal, the author examines criminal liability for the intentional or negligent actions of fiber optic operators, which are often the cause of accidents.

## II. METHODS

This research is based on normative juridical research, emphasizing statutory, case, and comparative approaches. The statutory approach focuses on relevant legislation, including laws and regional regulations. The case approach analyzes court decisions, and the comparative approach compares policies in Indonesia. This study examines the criminal liability of fiber optic network operators and the synchronization of the criminal justice system qualitatively, by utilizing various legal materials within the framework of positive legal theory.

## III. RESULT AND DISCUSSION

### Review of Criminal Liability for Negligence of Fiber Optic Cable Operators in Positive Law

In accordance with the concept of the theory of criminal responsibility from Peter Mahmud Marzuki. In the operational realm of fiber optics, this responsibility is guided by Law No. 36 of 1999 concerning Telecommunications. Referring to Article 47 and Article 59, providers are required to comply with the provisions of Article 20 concerning the priority of distribution and delivery of important information. Violations of these provisions, as well as other technical articles (such as Articles 16 to 34), can trigger criminal sanctions as stipulated in Article 49, with a maximum prison sentence of two years or a fine of up to IDR 200,000,000. In addition to criminal sanctions, Articles 45 and 46 also stipulate administrative sanctions, the culmination of which can be the revocation of business permits after going through the written warning stage. Referring to Law Number 38 of 2004 as stated in Article 1 Number 4, it states that roads include all land transportation infrastructure and its supporting buildings. In principle, the fundamentals of road management such as security and accountability are regulated in Article 2, with the aim of road management to ensure a positive impact. Parties who intentionally disrupt the function of the road are threatened based on Article 63 paragraph (1) with a maximum imprisonment of 18 months and a fine of IDR 1.5 billion. Meanwhile, Article 64 paragraph (1) and Article 65 paragraphs (1) and (2) regulate disruption of road operations with a maximum criminal threat of 3 months or a fine of IDR 300 million.

The community has a strategic function from the administrative side starting from the regulatory stage to road supervision regulated in Article 119 paragraph (1 and 2) of Government Regulation Number 34 of 2006. Then the regulation provides space for community participation to provide input (Article 118 paragraph 3) and report violations of road spatial planning (Article 120 paragraph 1). This synergy also demands full responsibility from the Governor and road stakeholders as government implementers in the field of road infrastructure, in accordance with the mandate of Article 1 paragraph (2) and (5). Safety standards and administrative sanctions related to the use of road space are stipulated in Article 23 paragraph (5) and Article 44 of PU Regulation No. 20/2010. Theoretically, these administrative sanctions are related to the concept of criminal responsibility which, according to Sudarto, is based on the existence of an unlawful act, error (*dolus* or *culpa*), and the perpetrator's capacity to bear legal responsibility without any excusing factors. A person can be held legally responsible if proven guilty (*schuld*), which includes intent (*dolus*) and negligence (*culpa*). Intention is defined as the condition where the perpetrator "wants and knows" (*willens en wietens*), so this intention is known that the perpetrator is aware of the impact of his actions. Apart from the existence of 'will theory' and 'knowledge theory', "According to Moeljatno, in his legal view, 'knowledge theory' is more important than 'will theory', because awareness of an act already exists before the intention to carry it out is formed.", then the fundamental difference in the aspect of knowledge when someone acts without being based on a strong desire.

On the other hand, negligence (*culpa*) is generally viewed as a form of error, which in the narrow sense manifests as carelessness. Negligence is classified as a fault factor if the act threatens life or property, or causes fatal or permanent harm. Fiber optic network providers are subject to various corporate criminal

liability schemes. The first model places all criminal liability on the management, assuming that corporations, as legal entities, cannot be prosecuted. The second model views the corporation as the creator or manager, but criminal liability remains with the company's management, regardless of whether the management knew about the act. However, Roeslan Saleh argues that this second model is more appropriate for administrative violations than criminal offenses. The third model stipulates that criminal responsibility does not stop only with the management, but the corporation itself can also be held accountable for its business development activities. When imposing sanctions, including in fiber optic criminal cases, judges must separate the element of guilt from the objectives of sentencing, as outlined in Articles 51-53 of Law No. 1 of 2023. Sentencing is now more than just punishment, but is oriented toward crime prevention, perpetrator rehabilitation, and restoring social balance without degrading human dignity. These guidelines require judges to prioritize justice over legal certainty when the two principles conflict. The purpose of law does not only stop at protecting and welfare the public, but also at maintaining human dignity by avoiding dehumanizing practices in the criminal process, it is very important to be the focus of attention.

According to Jeremy Bentham, the happiness of the majority is the parameter for legal products, not the law's purpose. He argued that utility is the touchstone for calculating happiness or otherwise. Gustav Radbruch taught the importance of law by emphasizing the priority principles of justice, utility, and certainty. The fatal negligence of fiber optic operators demands regulations that balance justice, benefit, and legal certainty in order to accommodate the interests of the public and business actors. The issue of legal liability becomes crucial when violations related to fiber optics are committed by operators, either in a corporate or individual capacity. The incident involving Sultan Rif'at Alfatih on Jalan Antasari, South Jakarta (January 5, 2023), is strongly suspected to have stemmed from the negligence of the fiber optic operator, which resulted in the victim's throat being broken. Legal liability in this case is directed at PT Bali Towerindo Tbk. Maqdir, as the company's attorney, stated that based on an internal investigation, the incident was purely an accident without any element of negligence. In contrast, the victim, through his attorney, Tegar, has officially filed a report with the Jakarta Metropolitan Police alleging negligence resulting in serious injuries, registered under Number LP/B/4666/VIII/2023/SPKT. The litigation route was pursued after a series of mediation attempts failed to reach an agreement. Unlicensed fiber optic installation is a criminal offense regulated in Yogyakarta City Regional Regulation Number 9 of 2021, which carries a fine of five million rupiah or one month's imprisonment. Given the importance of order in public spaces, organizers are required to ensure the legality and security of the installation site to avoid harming the public interest or facing legal consequences such as fines and court costs.

### **Criminal Law Synchronization as a Solution to Overcoming Fiber Optic Operator Errors**

The effectiveness of monitoring dangerous cables depends on legal understanding and the performance of officers, including the role of the Public Order Agency (Satpol PP) in enforcing regional regulations for public safety. According to Black's Law Dictionary, there are three main pillars of the criminal justice system: judges, prosecutors, and defense attorneys; correctional institutions (prison officers and parole officers); and law enforcement officials (police, sheriffs, and marshals). In practice, these three pillars synergistically form a comprehensive chain of law enforcement, from the investigation stage to the execution of the verdict. Advocates are legally recognized by Law No. 18 of 2003 as an integral part of the criminal justice subsystem, despite their independence, distinct from other government agencies. Mardjono Reksodipoetro, referring to Alan Coffey's views The criminal justice system must operate holistically and avoid partiality. Each segment of the system interrelates through the principle of legal causality (cause and effect). In the context of fiber optic operator negligence, the relevance of CG Howard and RS Mummers' theory regarding legal boundaries is crucial in addressing both material and immaterial losses. In line with this, Achmad Ali emphasized that compliance with the law is greatly influenced by the quality of regulations, the accuracy and proportionality of sanctions, and the professionalism of law enforcement.

The effectiveness of this law depends on the entire process, from socialization to legal discovery through legal reasoning, interpretation, and legal construction. Ultimately, as per Beccaria's principle, the purpose of punishment is deterrence, preventing perpetrators from repeating their actions and ensuring the protection of society. Handling of losses due to negligence of fiber optic cable managers is carried out based

on legal principles in the Indonesian criminal justice system based on the main legal instruments, such as the principles of legality, proportionality, priority, equality before the law, and benefit. Therefore, harmonization of the criminal justice system, as proposed by Muladi, is needed to optimize law enforcement. This harmonization encompasses three dimensions: structural synchronization, which emphasizes the alignment of judicial administration between law enforcement agencies; substantial mechanisms, which demand harmony in legal norms; and cultural synchronization, which strives for uniformity in perceptions, values, and outlooks as the philosophical foundation of the justice system. The judge's ruling on the criminal liability of fiber optic operators plays a crucial role in preventing the dominance of authority and underscores the urgency of synchronizing the substance, structure, and culture across all levels of the judiciary. Despite their specific duties, each subsystem must work together to build an integrated control mechanism to achieve balanced law enforcement.

This is supported by optimizing functional relationships and fostering internal oversight institutions in each agency in accordance with applicable regulations. Consistent application of criminal law principles is necessary to build trust that state protection is needed for the chaotic installation of fiber optic cables. Substantial Synchronization in the operational context of fiber optic cables, substantial mechanisms include legal harmony placing the principle of legality as the main foundation. This regulatory basis refers to the integration of the rules in Law No. 36 of 1999 concerning Telecommunications, Law No. 38 of 2004 concerning Roads, and their implementing regulations, such as Government Regulation No. 34 of 2006 and Regulation No. 20 of 2010 concerning the utilization of road space, down to regulations at the regional level, which form the legal basis for the management of telecommunications and road facilities. In terms of criminal liability, the element of negligence (*culpa*) that causes harm to another party has been regulated in Article 205 of the Criminal Code (old) and Article 343 of Law No. 1 of 2023 (National Criminal Code). Meanwhile, from a civil law perspective, Article 1365 of the Civil Code emphasizes the obligation to provide compensation for any unlawful act that causes harm. Several Regional Regulations (Perda) have been enacted to regulate fiber optic cables, including Yogyakarta City Regulation Number 7 of 2017. Fiber optic operators who ignore licensing procedures can be subject to criminal sanctions of up to three months in prison or a fine of IDR 50 million.

Enforcement of this regulation is in line with Regional Regulation Number 9 of 2021, which strengthens licensing requirements to ensure orderly telecommunications infrastructure development in the region. Second, DKI Jakarta Regional Regulation Number 8 of 1999 stipulates imprisonment or fines for those who fail to relocate cables to the SJUT, while Gubernatorial Regulation Number 106 of 2019 regulates administrative actions ranging from warnings to infrastructure demolition. Third, Bandung Regent Regulation Number 76 of 2017 in conjunction with Number 46 of 2018 mandates the Public Works and Housing Agency (PUTR) to oversee telecommunications infrastructure, while requiring all fiber optic cables—whether overhead, on sidewalks, or in ditches—to be buried 150 cm deep or moved to a shared network within two years. The effectiveness of fiber optic installation depends on expedited administrative procedures, easy access to rights-of-way, and integrated urban infrastructure. Defining jurisdictional scopes and establishing integrated information centers, standardizing and implementing SOPs for rights-of-way permits, and establishing appropriate fee regulations are essential. The state must improve fiber optic governance through regulatory reforms related to permits, rights of way, and fair financing schemes. Implementing these measures requires legal certainty, data integration, and inter-agency collaboration in civil infrastructure development. A comprehensive approach that integrates security, economics, and legal certainty is crucial to ensure public safety in accordance with global practices.

Structural synchronization is the harmony of judicial administration between, firstly, the entire Criminal Procedure Code and the Telecommunications Law provide a basis for Civil Servants (PPNS) to cooperate with the Indonesian National Police (Polri) in conducting special investigations into crimes in the telecommunications sector. The Criminal Procedure Code grants special authority to Polri and PPNS officials in the telecommunications sector to conduct comprehensive investigations, from verifying reports to terminating investigations related to crimes in that sector. Secondly, structural synchronization between Polri and PPNS aims to detect fiber optic violations, where both parties have investigative authority. The synergy

between the Civil Servant Officers (PPNS) and the National Police (Polri) and the Public Works and Housing Agency (PUPR) is crucial in addressing fiber optic operator negligence to ensure prompt resolution. Dwi Utari's research identified several crucial issues in fiber optic installations in road utility spaces, including licensing deficiencies, technical procedural errors, lack of coordination between parties, and damage to public facilities. Sudaryatmo from YLKI (Indonesian Consumers Foundation) that the victim is entitled to recovery costs, while the negligence of the cable owner can be proven through inspection records and monitored by the government with the threat of sanctions in the form of permit revocation.

Structural synchronization requires collaboration between institutions, from the Civil Servant Officers (PPNS), the National Police (Polri), regional governments, to relevant technical agencies. Collaboration between institutions such as the Ministry of Communication and Information Technology (Kominfo), the Ombudsman, and community participation is essential to achieving shared prosperity and comfort. The criminal justice system requires cultural synchronization to holistically align perceptions of life and philosophy. According to Soedarto, culture is an integral and inseparable part of criminal law policy. Quoted by Barda Nawawi Arief<sup>1</sup> Legal policy functions as an instrument of authority to form regulations that reflect the aspirations of the community, including in enforcing the responsibility of fiber optic operators for errors (schuld) whether intentional (dolus) or negligence (culpa). Mardjono Reksodiputro, the Criminal Procedure Code (KUHP) is considered to be a "procedural design" within the criminal justice system, encompassing the pre-trial or pre-trial phase, the court implementation or adjudication phase, and the trial completion phase. Criminal Procedure Law requires that every adjudication decision be based on facts and trial evidence to ensure the prosecution's commitment and provide protection. The adjudication phase places the defendant on an equal footing with the public prosecutor, fulfilling citizens' rights in the trial. The diversity of internal tasks does not prevent criminal justice subsystems from working together to achieve their goals.

This occurs when adequate legislation ensures that all subsystems function synergistically and in an integrated manner. Harmonizing perceptions between authorities and residents is very important in overcoming legal violations by fiber optic operators. The diversity of models within the criminal justice system—ranging from approaches to efficient crime control, procedural rights protection (due process), humanist approaches (family model), to legal-formal aspects and the social function of law—demonstrates the complexity of law enforcement. Therefore, as referenced in the thinking of Edi Setiadi and Kristian, Solid integration of roles is required between all law enforcement agencies, from the police to advocates. This synergy is essential for maintaining security and order in society, and the criminal justice system must be implemented effectively. The presence of a neutral third party facilitates the perpetrator and victim's understanding of each other's feelings and acceptance of their respective responsibilities. Referring to Martin Wright's view, as cited by Lilik Mulyadi, the criminal justice system embodies the implementation of restorative justice through (penal) mediation as a means of resolving cases. This approach is relevant for resolving legal cases, including disputes involving fiber optic operators. Fiber optic operators must be fully responsible for any legal violations they commit, whether intentionally or through negligence. For the sake of justice, sanctions must target corporations as the primary beneficiaries of criminal activity, not just their management.

#### **Addressing Negligence of Fiber Optic Operators for Criminal Purposes**

Violations of the law by fiber optic operators must be addressed through criminal prosecution. Sentencing guidelines serve as a reference for law enforcement in achieving justice, not just legal certainty. Judges are expected to not only sentence but also consider therapeutic aspects in accordance with the sentencing guidelines stipulated in Article 54 of the Criminal Code Reform. These guidelines serve as a basis and control for judges in sentencing, where positive law is embodied in the values of Pancasila and the 1945 Constitution. The purpose of sentencing is to protect society and prevent criminal acts. The legal process can impact the rights of perpetrators and create social stigma, so criminal law should be a last resort in law enforcement. Criminal liability depends on the subjective circumstances of the perpetrator and the existence

of exculpatory reasons, such as emergency circumstances or self-defense. For the sake of complete justice, careful legal coordination must be implemented to protect citizens' rights from the risks associated with fiber optic cable management.

#### IV. CONCLUSION

Enforcing criminal liability against fiber optic operators for errors, whether intentional or negligent, must be comprehensively enforced to protect the public interest. Legal sanctions should not be imposed solely on administrators; they must also encompass corporations as the beneficiaries and involve the responsibility of local governments as urban planning regulators. Penal mediation and the combination of sanctions are crucial solutions to achieving justice under positive law. Handling the criminal liability of fiber optic operators requires a comprehensive synchronization of the justice system—covering substantive, structural, and cultural aspects—to ensure justice for the community. Legal reforms need to immediately accommodate Deferred Prosecution Agreements (DPAs) as an effective solution for cases with measurable economic losses. Future research needs to deepen the study of the correlation between corporate law and economics so that the implementation of the DPA can achieve just resolution of cases. A thorough analysis of the synchronization of the criminal justice system is urgent to ensure optimal and integrated law enforcement.

#### REFERENCES

- [1] Ali, Achmad. *Uncovering Legal Theory and Jurisprudence*. Jakarta: Kencana Prenada Media Group, 2009.
- [2] Amrani, Hanafi, and Mahrus Ali. *The Development and Implementation of the Criminal Responsibility System*. Jakarta: Rajawali Press, 2015.
- [3] Amrani, Hanafi. *Criminal Responsibility System: Development and Implementation*. Jakarta: Rajawali Pers, 2015.
- [4] Beccaria, Marquis. *An Essay on Crime and Punishment*,. Translated. Yogyakarta: Genta Publishing, 2011.
- [5] Bryan, A. Garner. *Black's Law Dictionary*. United States of America: West Group St. Paul, 2009.
- [6] Gaib, Reindra. "Elements of Criminal Acts and the Capacity for Criminal Responsibility According to the Criminal Code." *Lex Crimen* 7, no. 5 (July 2018).
- [7] Hujbers, Theo. *Philosophy of Law in the Course of History*. Yogyakarta: Kanisius, 2007.
- [8] Lilik Mulyadi, *Penal Mediation in the Criminal Justice System: Study of Principles, Norms, and Practices*, Seminar Paper on research results on Penal Mediation in the Criminal Justice System in Indonesia, organized by the Center for Research and Development of Law and Justice, Research and Development Agency for Legal and Judicial Training of the Supreme Court of the Republic of Indonesia, Jakarta, 26 October 2011
- [9] Marzuki, Peter Mahmud. *Legal Research Methods*. Jakarta: Kencana Prenada Group, 2017.
- [10] Moeljatno. "Criminal Acts and Responsibility in Criminal Law, Speech Delivered at the Ceremony to Commemorate the 6th Anniversary of Gadjah Mada University." Yogyakarta, 1955
- [11] Muhammad, Rusli. *Criminal Justice System*. Yogyakarta: UII Press, 2011.
- [12] Muladi, and Dwidja Priyatno. *Corporate Criminal Liability*. Jakarta: Kencana Prenada Media Group, 2010.
- [13] Muladi. *Selected Chapters on the Criminal Justice System*. Semarang: Diponegoro University, 1995.
- [14] Muslehuddin, Muhammad. *Philosophy of Islamic Law and the Orientalists*. Delhi: Markaz Maktabah Islamiyah, 1985.
- [15] Reksodipoetro, Mardjono. *The Criminal Justice System*. Jakarta: UI Legal Documentation Center, 1983.
- [16] Setiadi, Edi, and Kristian. *Integrated Criminal Justice System and Law Enforcement System in Indonesia*. Jakarta: Prenadamedia Group, 2017.
- [17] Ahmad Muharor, Bambang Panji Asmara and Zainudin Bonok, "Analysis of Overhead Fiber Optic Transmission at 1310 Nm Wavelength from Optical Distribution Point (ODP) – Optical Network Termination (ONT)", *Jambura Journal*, Vol. 1, No. 2, 2019. DOI :<https://doi.org/10.35586/jjur.v7i1.1867>.
- [18] Hariyadi. "Fiber Optic Communication System and Its Utilization at PT. Semen Padang." *Rang Teknik Journal* 1, no. 1 (2018): 43–51. DOI :<https://doi.org/10.31869/rtj.v1i1.614>.
- [19] Indonesia, BBC. "Sultan Rifat Alfatih: Students Entangled in Fiber Optic Cables 'Demand Justice' - Who Should Be Responsible for the Chaotic Utility Network? - BBC News Indonesia." BBC Indonesia, 2023.

- [20] Iqbal, Ahmad. "Implementation of Deferred Prosecution Agreements in Indonesia as an Alternative to Settling Economic Crimes Committed by Corporations." *Jurnal Juridis* 7, no. 1 (June 2020). DOI: <https://doi.org/10.35586/jjur.v7i1.1867>.
- [21] Irmawanti, Noveria Devy, and Barda Nawawi Arief. "The Urgency of the Goals and Guidelines for Sentencing in the Context of Reforming the Criminal Law Sentencing System." *Journal of Indonesian Legal Development* 3, no. 2 (May 28, 2021): 217–27. DOI: <https://doi.org/10.14710/jphi.v3i2.217-227>.
- [22] Mohidin, Ismail KH, and Fajar Hermawanto. "Supervision of Fiber Optic Network Development at the Communication, Informatics, and Statistics Office of Gorontalo Province." *Gorontalo Community Service Journal (JAG)* 5, no. 1 (June 10, 2022): 32–38. DOI: <https://doi.org/10.30869/jag.v5i1.916>.
- [23] Muchlas Rastra Samara Muksin, The Purpose of Criminalization in the Reform of Indonesian Criminal Law, *Jurnal Sapientia et virtus*, Vol. 8, No. 1, 2023. DOI : <https://doi.org/10.15575/adliya.v16i1.22726>.
- [24] OECD. "Public Rights of Way for Fiber Deployment to the Home." OECD Digital Economy Papers 143 (2018). DOI : <https://doi.org/10.1787/230502835656>
- [25] Paidun, Hendri. "A Review of Criminal Acts of Negligence Causing Death by Motor Vehicle Drivers." *Lex Crimen* 2, no. 7 (November 2013).
- [26] Pos, Jawa. "PT Bali Towerindo Refuses to Apologize for Fiber Optic Cable That Strangled Sultan Rif'at, Making Him Unable to Speak - Jawa Pos," nd
- [27] Pratiwi, Endang, Theo Negoro, and Hassanain Haykal. "Jeremy Bentham's Utilitarian Theory: The Purpose of Law or a Method of Testing Legal Products?" *Constitutional Journal* 19, no. 2 (June 2, 2022): 268–93. DOI : <https://doi.org/10.31078/jk1922>.
- [28] Sugiswati, Besse. "Criminal Law Aspects of Telematics in Relation to Technological Progress in the Information Age." *Perspectives* 16, no. 1 (2011): 59–72.
- [29] Utari, Dewi. "Civil Liability in the Installation of Fiber Optic Cable Networks in Salatiga City." Master of Law, UKSW Postgraduate Program, 2017. DOI : <https://doi.org/10.46839/ljih.v0i0.298>.
- [30] Utoyo, Marsudi, and Kinaria Afriani. "Intentional and Unintentional in Indonesian Criminal Law." *Lex Librum: Journal of Legal Studies* 7, no. 1 (November 2020). DOI : <https://doi.org/10.46839/ljih.v0i0.298>.