

State Land, Private Homes: Legal Implications of Public Apartment Ownership in Bandung

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Abstract

The construction of apartment buildings (flats) is carried out to accommodate communities that do not have extensive land. The land that becomes the location for apartment construction currently holds ownership rights (Hak Milik), building use rights (Hak Guna Bangunan/HGB), and usage rights (Hak Pakai). Law Number 20 of 2011 (Law on Apartment Buildings/Rusun) regulates the construction of public apartments by utilizing state/regional government land, considering that land rights for building apartments are limited, particularly in facilitating low-income communities. However, the construction of apartments on government or regional land still faces many obstacles, thus hindering implementation. This research employs a descriptive-analytical methodology with a normative legal approach. Library research data is analyzed qualitatively and normatively. Based on the study's findings, the government has the duty to utilize state or

regional land in the form of land to build public apartments. There are various challenges in providing public apartments, both owned (Rusunami) and rented (Rusunawa). The government plans to issue a Building Ownership Certificate for Apartment Units (SKBG Sarusun) to overcome the obstacles in meeting the demand for public apartments. These apartments are built as a pilot project in the city of Bandung. Since the implementing regulations for SKBG Sarusun have only recently been issued, it is currently impossible to prove ownership of SKBG Sarusun for public apartments built on government or local government land. Therefore, implementing instructions must be issued immediately.

Keywords

Apartment Buildings; SKBG Sarusun; State/Regional Government Land (BMN/D)

A. Introduction

Every person has the right to a good and healthy living environment, a place to live, and the opportunity for physical and spiritual welfare, according to Article 28H paragraph (1) of the Fourth Amendment to the 1945 Constitution of the Republic of Indonesia. Housing is one form of a country's achievement in encouraging its people to be independent, productive, and actively involved in developing character and the nation's personality.¹ Housing development and settlements constitute a policy to meet basic human needs, especially for low-income communities in densely populated urban areas. The form and system of apartment buildings must be used as guidelines for housing and settlement development to improve land use efficiency and effectiveness, particularly in large cities and densely populated areas where land is already limited. Especially in urban areas, the existing land supply, which cannot be expanded, does not match the continuously growing population. Consequently, land prices increase.

¹ Undang-Undang Nomor 20 Tahun 2011 tentang Rumah Susun

Law No. 5 of 1960 concerning the Basic Regulations on Agrarian Principles (hereinafter referred to as UUPA) regulates land rights, including Ownership Rights (*Hak Milik*), HGB, and Usage Rights (*Hak Pakai*). According to the Apartment Building Law, the implementation of apartments aims to increase the efficiency and effectiveness of space utilization while ensuring the provision of decent and affordable apartments. The State's dedication to providing affordable apartments for Low-Income Communities (MBR - Masyarakat Berpenghasilan Rendah).

The Ownership Right over Apartment Units (SHM Sarusun - Sertifikat Hak Milik Satuan Rumah Susun) which binds apartment units with the land is the ownership structure that has been valid so far. Specifically, apartment buildings are located on land that holds Ownership Rights, HGB, and Usage Rights over state land, as well as Usage Rights over land that holds Management Rights (*Hak Pengelolaan*). The cost of apartments increases due to rising land prices, making them unaffordable for MBR.²

By utilizing state or regional assets in the form of land with a 60-year lease period and the Certificate of Ownership of Apartment Buildings (SKBG Sarusun) as proof of ownership, the Apartment Building Law encourages apartment construction. To fulfill this hope, the Apartment Building Law regarding the issuance of SKBG Sarusun must have its implementing regulations issued promptly. This is done as a response to changes occurring in the increasing population density in cities. Furthermore, due to the accumulation of land by some individuals, the supply of urban land becomes increasingly limited. Consequently, the community lacks sufficient land for housing and settlements, forcing the government to build apartments, stacked buildings, or vertical structures.³ Apartment construction is one of the ways to address the growing slums. This is because apartment development has proven to reduce land use, create more urban open

² Betty Rubiati,dkk.,”Kepastian Kepemilikan Rumah Susun Bagi Masyarakat Berpenghasilan Rendah”, *Jurnal Bina Hukum Lingkungan*, Voleme 1, Nomor 2, April 2017, hlm. 135

³ Supriadi, *Hukum Agraria*, Sinar Grafika, Jakarta , 2007, hlm. 242.

spaces, and revitalize slum areas.⁴ Apartment buildings have components, namely:

1. Apartment units used independently as residences and have access to public roads;
2. Common Areas, used jointly within a single functional unit, for example, floors, roofs, stairs, elevators, public spaces, etc.
3. Common Objects, which are not apartments but are owned jointly and inseparably for common use.
4. Common Land, specifically a plot of land whose boundaries are determined based on building permit requirements and utilized based on inseparable common rights, upon which the apartment building stands;

The legal definition of "Apartment" (Rusun) as used in this law applies to multi-story buildings that always have an individual ownership system and common rights. This building can be used for housing or non-housing purposes, either separately or jointly as a single development system.⁵

Apartment buildings are divided into four (4) groups based on Article 1 of the Strata Title Law, namely as follows:

1. Public Apartment (Rusun Umum) is an apartment arranged to accommodate the housing needs of low-income communities.
2. Special Apartment (Rusun Khusus) is an apartment arranged to meet specific requirements.
3. State Apartment (Rusun Negara) is a state-owned apartment that functions as housing, a place to raise a family, and a means to support the implementation of duties.
4. Commercial Apartment (Rumah Susun Komersial) is built for the purpose of generating money.

Based on Article 45 of the Apartment Building Law, public apartments can be controlled by way of ownership or rental. The official

⁴ Mimi Rosmidi Akis dan Imam Koeswahyono, *Konsepsi HAK milik Atas Satuan Rumah Susun Dalam Hukum Agraria*, Setara Press, Malang, 2010, hlm. 12

⁵ Ari S. Hutagalung, *Condominium dan Permasalahannya*, Badan Penerbit FH UI, Jakarta, 1998, hlm. 12

term for public apartments for low-income communities consists of 2 (two) types of apartments, namely:⁶

1. Simple Rental Apartment (Rusunawa)
2. Simple Ownership Apartment (Rusunami)

Apartments can be built on land according to Articles 17 and 18 of the Apartment Building Law:

1. Ownership Rights (Hak Milik);
2. HGB or Usage Rights over state land,
3. Usage Rights or Management Rights (Hak Pengelolaan);
4. State or regional government land (Tanah milik Negara atau daerah);
5. Wakaf land (Tanah Wakaf).

To build apartments on state/regional government land or waqf land, it can be done in the following ways:⁷

1. Lease or land utilization cooperation;
2. A written agreement has been made;
3. The land lease period is 60 years from the date of signing the written agreement;
4. The government determines the land lease rate to ensure affordable selling prices.

To be clearer, developers must separate apartment units, common spaces, common objects, and common land:

1. The boundaries of apartments that can be used independently by each owner;
2. The boundaries and description of common spaces and common objects
3. The boundaries and description of common land and its area

Related to one of the principles, namely the horizontal separation principle sourced from customary law, which states that land rights do not always mean ownership of buildings and plants on that land. Therefore, SKBG Sarusun is an example of the horizontal separation principle, which states that the central or regional

⁶ Adrian Sutedi, *Hukum Rumah Susun & Apartemen*, Sinar Grafika, Jakarta, 2012, hlm. 190

⁷ Undang-undang Rumah Susun

government does not have to relinquish its assets in the form of land when state or regional property is leased to build apartments.⁸

PP No. 28 of 2020 contains the definition of state and regional government assets based on Article 1 Numbers 1 and 2, located in the budget purchased or obtained. State property means purchased through the State Budget (APBN), while regional property is obtained through the Regional Budget (APBD) or from other legal acquisitions. Meanwhile, state/regional government property based on Article 49 of Law No. 1 of 2004 means the land is controlled by the central/regional government and must have a certificate.

The utilization of State/Regional Government Property (BMN/D) can also be carried out in the form of cooperation as referred to in paragraph (1). Because it will involve the management of state/regional property, building apartments on state/regional government land to meet housing needs for the community—especially low-income communities.

The research problem will be limited as follows according to the introduction above:

1. How is the utilization of state or regional government land for apartment construction?
2. How is the ownership of apartment construction on state or regional government land in Bandung?

This research is descriptive-analytical, meaning facts are recorded accurately, methodically, and factually. Furthermore, this research aims to present data on human phenomena and others as accurately as possible. The normative legal approach method, which involves tracking, evaluating, and analyzing secondary data related to the research material, is the methodology used in this research. The application of the legal approach while still considering that the issue being studied centers on the reciprocal relationship between various regulations. To obtain a complete picture of the issue being studied, all

⁸ Betty Rubiati, *Asas Hukum Agraria Nasional : Penerapan Asas Pemisahan Horozontal Dalam Kepemilikan Tanah Dan Bangunan*, Bandung : Logoz Publishing, 2016, hlm. 20

data—primary and secondary—will be examined using qualitative normative analysis, and the findings will be presented descriptively.⁹

B. Apartment Construction Through the Utilization of State/ Regional Government Land

The utilization of State/Regional Government Property (BMN/D) can be carried out through limited cooperation for infrastructure financing, leasing, lending, utilization cooperation, and build-transfer-operate/build-operate-transfer without changing the ownership status. The property manager can determine the utilization of BMN/D that is not used to carry out core functions and duties. Specifically, property managers can use Regional Government Assets (BMD) after obtaining permission from the BMD management authority holder (governor, mayor, or regent).

The government initiated a program in 2006 to build one million houses and one thousand apartment towers to meet housing needs, especially for MBR. However, the biggest challenge is finding land for building houses and apartments, as well as improving the quality of settlements, which is particularly a challenge for MBR living in urban areas. On the other hand, it is very ironic that most of the government's land assets—known as State Property—located in urban areas are mostly idle and underutilized. Therefore, the utilization of BMN/D land is one form of land provision arrangement for apartments in the Apartment Building Law. Because the utilization of BMN/D land impacts other sectoral regulations, particularly the State Treasury Law, the use of land for apartment construction must refer to the provisions of regulations governing BMN/D land.¹⁰ The government is trying to overcome the problem of housing and settlement development accumulation by utilizing BMN/D for apartment construction. In

⁹ Soerjono Soekanto, *Penelitian Hukum*, UI Press, Jakarta, 1990, hlm. 10.

¹⁰ Maharani, "Sertipikat Kepemilikan Bangunan Gedung (SKBG), Menyongsong Terbitnya Lembaga Hukum Baru Di Indonesia SKBG Tanpa Memiliki Hak Atas Tanah," 2013, (<http://www.ippatonline.com/artikel-1-sbkgb.html>),

2013, the accumulation of BMN/D ownership reached 15 million units and housing savings guarantees up to 7.3 million units.¹¹

By the end of 2022, the government remains responsible for providing safe, affordable, and decent housing for the community. This results in a backlog of up to 12.71 million households. The Ministry of Public Works, Directorate General of Cipta Karya, is responsible for providing Rusunawa, which includes providing decent housing in Bandung. During the period 2005 to 2012, eight (8) Twin Block (TB) rental apartments were built in the City of Bandung. These TBs are located in:

1. Cingised, Arcamanik District
2. Sadang Serang I, Coblong District
3. Rancacili I, Rancasari District.

The process must strictly follow the applicable provisions regarding the utilization and transfer of State/Regional Government Property (BMN/D) in the form of land and buildings, so the construction of Rusunawa in the City of Bandung takes a very long time. To avoid the possibility of an Audit Board of the State (BPK) audit. Thus, by the end of 2013, only two apartments had been occupied. In addition, the housing problem for Rusunawa in the City of Bandung is that there is no agreement regarding the lease period and no rental rates from the local government that must be stipulated in the Bandung City Mayor's Regulation.

Considering the description above, the problem that becomes the responsibility of the local government is that it cannot immediately utilize some of the assets because the Rusunawa assets have not been donated, so in Permendagri No. 17 of 2007 concerning Technical Guidelines for the Management of Regional Government Property, it is stated that the Local Government cannot immediately utilize the assets because they are still State Property (BMN) status. However, the

¹¹ Iskandar Saleh, disampaikan pada Focus Group Discussion “Masukan Terhadap Peraturan Pemerintah Amanat UU No. 20 Tahun 2011 tentang Rumah Susun”, diselenggarakan oleh Kemenpera RI, Jakarta, 22 Oktober 2013.

provision must follow the steps already stipulated in Permen Keuangan No. 96 of 2007, PP Number 6 of 2006, and Law No. 1 of 2004.¹²

With the issuance of the implementing provisions for apartments, particularly PP No. 13 of 2021 concerning the Implementation of Apartment Buildings, the new problems can be resolved. With the issuance of Perwal No. 1058 of 2013 concerning the Procedure for Implementation of Occupancy and Utilization, especially in the City of Bandung. Meanwhile, developers must also play a role because Rusunawa indeed has a large market, so the Ministry of Public Housing will continue to encourage developers to continue the Rusunami program. Therefore, the Apartment Building Law passed by the DPR is expected to encourage the construction of 1,000 apartment units throughout Indonesia.¹³

According to Bernaldy, Assistant Deputy for Formal Housing Valuation at the Deputy for Formal Housing of the Ministry of Public Housing, the construction of apartments is one way to meet the community's housing needs. Moreover, land prices in the area continue to rise every year. Presidential Regulation Number 6 of 2006, which is still under revision, is the main obstacle to utilizing BMN land for building Rusunami.¹⁴

Law No. 1 of 2004 in the Presidential Regulation regulates the management of BMN/D. Although there is only one article that needs to be changed, it will impact BMN land because its status changes from HPL to HGB, making it possible for banks to use it as collateral. Since most of the BMN land in DKI Jakarta is located in strategic locations, BMN must release its land based on the applicable Tax Object Sale Value (NJOP) if it follows the provisions. As long as these rules are still in effect, BMN will not be able to release Rusunami at that price because building it requires land worth Rp1 million per square meter with a price below Rp144 million.

¹² TH.Respati & Chris Robert Marbun, "Rusunawa Mangkrak, Salah Siapa?", Buletin Cipta Karya, Edisi 05/Tahun XI/ Mei 2013.

¹³ Sudirman Wamad, "Antrean Dan Terbatasnya Unit Di Rusunawa Bandung", 2023, (https://www.detik.com/jabar/berita/d_6513848/antrean-dan-terbatasnya-unit-di-rusunawa-bandung), diakses 12 April 2025

¹⁴ Achmad Adhito Hatanto, "Pemerintah Bangun 1000 tower Rusunami Via UU", Jaringnews, htm, diakses pada 12 April 2025

In line with that, the government is more focused on Rusunami on land developed by the private sector because it is not difficult to secure bank credit for ownership (for Rusunami buyers) or construction loans. There is hope that the government and the community can build Rusunami thanks to the release following the issuance of Permen No. 17 of 2021 concerning the Form and Procedure for Issuing SKBG Rusun and PP Number 13 of 2021 concerning the Implementation of Apartment Buildings. To clarify everything about SKBG, the Ministry of Public Works and Public Housing (PUPR) has held several technical guidance forums and socializations since all the regulations were issued.

C. Ownership of Apartment Buildings Built on State or Regional Government Land in Bandung

Every person has the right to a good and healthy living environment, decent housing, and physical and spiritual welfare, according to Article 28H paragraph (1) of the 1945 Constitution of the Republic of Indonesia. Housing plays an important role in forming the character and personality of the nation and in realizing complete Indonesian people who are independent, competitive, and productive. Consequently, it becomes the State's obligation to guarantee the fulfillment of the right to decent and reasonably priced housing.

The Apartment Building Law facilitates the construction of apartments by utilizing state or regional government land in the form of land with a 60-year lease period and the Certificate of Ownership of Apartment Buildings (SKBG Sarusun) as proof of ownership. SKBG is issued in accordance with the provisions of the Apartment Building Law, PP Number 13 of 2021, which is a regulation recently issued. Article 49 of the Apartment Building Law states that additional provisions regarding SKBG for apartment units and the procedure for its issuance are regulated by PP. SKBG is issued following various applicable provisions.

SKBG Apartment Buildings will also make MBR more affordable to own apartments. Because of their proximity to their place of residence, MBR occupy apartment buildings. Because the land price is not calculated in determining the object of sale, SKBG apartments are cheaper than SHMSRS apartments. Low-Income Communities (MBR)

can not only rent Rusunawa but also own Rusunami. Until now, MBR have only rented apartments built on state or regional government land.¹⁵

Rusunami was built in Bandung as an effort to implement the mandate of the Apartment Building Law by using state or regional government land. As a metropolitan city, the annual population growth of Bandung has a significant influence on housing needs. However, in reality, a backlog occurs due to limited access to housing financing. The Head of the DPKP3 Division of the City of Bandung reported that although the city's backlog has grown to 10,000 units, only 10% of the target has been achieved.

According to the analysis results of the Metropolitan Development Management Board of West Java Province (WJPMMDM), the City of Bandung had 145,592 backlog units in 2010. In 2025, this number will increase to 636,929 units. There are several reasons for the high backlog in the City of Bandung. Bandung, the capital of West Java Province, is rapidly becoming more urban. However, the availability of affordable housing for MBR is limited. Because developers are reluctant to build cheap houses, the supply of houses available for MBR is usually limited. The high cost of land is one of the reasons why developers are reluctant to build cheap houses. In addition, because Bandung is one of the largest cities in Indonesia, land prices there are usually higher than in surrounding areas. The Ministry of Public Works and Public Housing (PUPR) initiated providing public apartments in Cisaranten Bandung through a Government and Business Entity Cooperation Scheme (KPBUE) as one of the steps to meet the availability of apartments for MBR at a fair price. Based on the results of the Real Demand Survey (RDS) conducted, there is a need for self-owned apartments for MBR apartment units with the SKBG Sarusun scheme in this case.

¹⁵ Juneidi D. Kamil, "SKBG Sarusun Jawab Kebutuhan Hunian MBR di Perkotaan", 2021, (<https://realestat.id/berita-properti/skbg-sarusun-jawab-kebutuhan-hunian-mbr-di-perkotaan/>), diakses, Rabu, 18 Januari 2023, Pukul 10.30

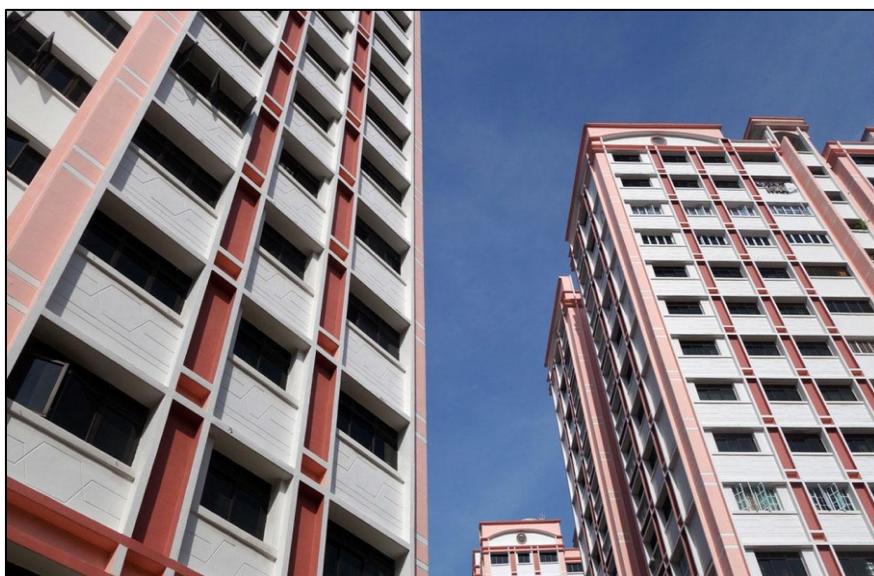


Figure 1. Cisaranten Apartment

The Cisaranten Project is located in Cisaranten Bina Harapan Village, Bandung City. Based on the need to maximize the utilization of BMN assets belonging to the Ministry of Public Works and Public Housing (PUPR), the KPBU Apartment Project Cisaranten Bina Harapan is currently being implemented in the City of Bandung. This project is expected to provide approximately 1,900 units of affordable housing, with prices starting from Rp 250 million to Rp 375 million, depending on the type. For those who meet the requirements, the government provides financing subsidies, and the installments are also light. These apartments are targeted at communities with an income between Rp 4 million and Rp 8 million.¹⁶

To ensure the Cisaranten Apartment location plan is free from problems in the future, this project in West Java will become a pilot project or example for other regions in Indonesia, focusing on good governance and environmental friendliness from regulation making to the implementation of these regulations in the field.

¹⁶ Humas Kota Bandung, "Pemkot dan PUPR siapkan 1.879 Unit Hunian Murah Bagi Warga Bandung_08 Juli 2023, <https://www.bandung.gi.id> , diakses 12 April 2025

D. Conclusion

The government has the duty to utilize State/Regional Government Property (BMN/D) in the form of land to build apartments in order to meet the housing needs of Low-Income Communities (MBR). Apartments can be purchased either as owned units (Rusunami) or rented (Rusunawa). There are various challenges in the field in providing Rusunawa and Rusunami. The long donation process from the Central Government to the Local Government is one of the challenges in building Rusunawa. Meanwhile, funding is a constraint in building Rusunami. When government assets are released, BMN/D land that has management rights cannot be pledged as bank loan collateral for the funds needed in apartment construction. Conversely, this process is very challenging if government assets are released. A 60-year lease using BMN/D land is the way apartment owners on that land obtain their ownership. If the government decides to sell flats with apartment ownership certificates (SKBG) as proof, the government does not need to release its land assets. Finding quick solutions to eliminate barriers in providing apartments and accelerating the Central Government's donation process is very important to meet the housing needs of Low-Income Communities (MBR).

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