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Transitioning from Traditional to Digital Land Administration in Ponorogo

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Abstract

The digital transformation of land administration, as outlined in Government Regulation No. 18 of 2021, marks a strategic step toward modernizing Indonesia's land registration system. This policy eliminates traditional land documents, such as Letter C, Girik, and Petok D, and replaces them with electronic certificates under the National Land System. This study aims to analyze the effectiveness of this transition in Ponorogo District, focusing on the legal, technical, and social barriers encountered during the document conversion process. Data were collected through in-depth interviews with BPN officials, village administrators, and Letter C users, employing a socio-legal approach and qualitative methods. Findings indicate that, despite a strong legal basis, implementation is hindered by inadequate socialization, unprepared digital infrastructure, and land disputes stemming from overlapping historical data. An integrated data strategy, village official training, and participatory approaches are essential for a fair and inclusive transition.

Keywords

Digitalization; Land Administration; Land Registration; Letter C; Legal Transformation.

A. Introduction

Indonesia is known as an agrarian country, where most people earn their living as farmers. In this context, there is a special relationship between humans and land, because land is valuable to humans. Land does not merely mean soil (in the physical sense), but it is also the foundation upon which social spaces, various relationships, connections, competition, and politics are built.¹ Land has a wide variety of functions, ranging from economic tasks that can be transferred, such as the sale and purchase of land or inheritance, to land as a factor of production. Land is irreplaceable, immovable, and non-reproducible. In some societies, land is considered highly valuable for self-esteem. Therefore, land is not only an economic resource but also a symbol of identity, honor, and the community's survival.²

The definition of land according to the Basic Agrarian Law (UUPA) Number 5 of 1960 states that land is part of the earth's surface that can be owned and controlled by individuals or legal entities, so that there are subjects of rights (people) and objects of rights (land) and a relationship of control and use that determines the legal certainty of ownership.³ Furthermore, the definition of land registration according to Boedi Harsono is a series of activities carried out by the government on an ongoing, continuous, and regular basis, which includes the collection, management, recording, and presentation of physical and legal data in the form of maps and lists, regarding land parcels and apartment units,

¹ Muhammad Arba, *Hukum Agraria Indonesia*, ed. Tarmizi (Jakarta: Sinar Grafika, 2019).

² Isnaini and Anggraeni A. Lubis, *Hukum Agraria Kajian Komprehensif (Buku Ajar)*, ed. Tim Pustaka Prima, *Pustaka Prima* (Medan, 2022).

³ *Undang-Undang Nomor 5 Tahun 1960 Tentang Pokok-Pokok Agraria.*, n.d.

including the issuance of land certificates as proof of rights for land parcels that already have rights and ownership rights over apartment units as well as certain rights that encumber them. The government has an obligation to provide legal certainty regarding the status of land ownership held by community and business entities within the territory of the Republic of Indonesia.⁴ In relation to control, use, and ownership, the registration of land rights is carried out to create legal certainty, as explained in Article 19 paragraph 1 of the Basic Agrarian Law: "*To guarantee legal certainty, the government shall carry out land registration throughout the territory of the Republic of Indonesia in accordance with the provisions stipulated by government regulations.*" Land registration includes:

1. Land measurement, mapping, and registration,
2. Registration of land rights and transfer of such rights,
3. Issuance of certificates of title, which serve as strong evidence of ownership.⁵

In the context of modernizing land administration and accelerating the agrarian reform agenda, the government then implemented Government Regulation No. 18 of 2021, an agricultural reform policy aimed at simplifying the land registration system by eliminating old land documents (such as Girik, Petok D, and Letter C) and replacing them with electronic certificates based on the National Land Administration System.⁶ One of the documents of concern is Letter C. This village administrative document records land ownership and use before the issuance of the land rights certificate by the National Land Agency (BPN). Article 97 of

⁴ Boedi Harsono, *Hukum Agraria Indonesia: Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi Dan Pelaksanaannya*, 11th ed. (Jakarta: Universitas Trisaksi, 2013).

⁵ Paryanto Paryanto, "Letter C Document as a Preliminary Evidence of Ownership of Land Rights (Study in Kebumen District, Indonesia)," *Journal of Law and Legal Reform* 2, no. 3 (2021): 329–52, <https://doi.org/10.15294/jllr.v2i2.46535>.

⁶ Meta Nadia Winata, "Analisis Terhadap Tanda Bukti Hak Lama Sebagai Petunjuk Kepemilikan Hak Atas Tanah Menurut Peraturan Pemerintah Nomor 18 Tahun 2021," *Indonesian Notary* 3, no. 3 (2021): 44.

Government Regulation No. 18 of 2021 stipulates: "*Land certificates, compensation certificates, village certificates, and other similar documents intended as evidence of land control and ownership issued by the village head/sub-district head can only be used as a reference for land registration.*"⁷

Thus, documents such as Letter C are no longer recognized as legally binding evidence of ownership, but rather mark the declining relevance of girik as evidence of land control. Letter C is only an administrative support in the conversion process to a certificate.

The land administration transformation process is also taking place in Ponorogo Regency. However, its implementation faces various obstacles, including social, administrative, and financial factors, which slow the conversion of traditional land documents to a digital land system. This study analyzes the effectiveness of Government Regulation No. 18 of 2021 in facilitating the transition of land documents at the Ponorogo Regency Land Office, focusing on the supporting and inhibiting factors in achieving the target of timely certificate conversion.

Research on the digitization of land administration has been conducted extensively. For example, research by Dian reveals that the main challenges of land administration transformation are ensuring legal certainty, technological readiness, and public acceptance of the digital system.⁸ Arifin et al. highlight the challenges of limited digital infrastructure, human resource readiness, and public resistance to electronic certificates.⁹ Yolanda et al. discuss the use of old land documents as a basis for registering rights. The challenges faced are the limited legal force of traditional

⁷ Pasal 97 Peraturan Pemerintah Nomor 18 Tahun 2021 Tentang Hak Pengelolaan, Hak Atas Tanah, Satuan Rumah Susun, Dan Pendaftaran Tanah, n.d.

⁸ Dian Aries Mujiburohman, "Transformasi Dari Kertas Ke Elektronik: Telaah Yuridis Dan Teknis Sertipikat Tanah Elektronik," *BHUMI: Jurnal Agraria Dan Pertanahan* 7, no. 1 (2021): 57–67.

⁹ Sy Arifin Habibi et al., "Transformasi Digital Administrasi Pertanahan: Implementasi Dan Tantangan Sertipikat Elektronik Di Indonesia," *RIO LAW JURNAL* 6, no. 1 (2025): 499–507, <https://doi.org/DOI:https://doi.org/10.36355/rlj.v6i1>.

papers and the need to convert them into official certificates.¹⁰ Romzul examines the position of old documents after the issuance of Government Regulation No. 18 of 2021. The challenges are legal certainty and agrarian justice, as older documents are no longer fully recognized.¹¹ However, most studies focus solely on normative legal aspects, without considering the community's social dynamics or implementation obstacles at the village level. Empirical research on the implementation of Government Regulation No. 18 of 2021 in Ponorogo Regency remains very limited, even though this area is one of the regions with a high level of Letter C usage.

The urgency of this research is even greater considering Article 96 of Government Regulation No. 18 of 2021, which stipulates that old land documents are only valid as basic guidelines for land registration within 5 years after the Government Regulation comes into effect, thereby setting a deadline for the conversion of Letter C documents to electronic certificates until February 2026. If the conversion process is not accelerated, the people of Ponorogo Regency could face the risk of losing their administrative basis for land rights, increased potential for disputes due to overlapping claims, legal uncertainty in land transactions, and unequal access to rights protection for low-income communities. Therefore, a scientific study is needed to identify the legal, technical, and social obstacles to policy implementation and to formulate fair and inclusive acceleration strategies to ensure the legal certainty of land ownership at the local level. It is hoped that this research will produce strategic recommendations to accelerate the transformation of land administration in a fair, inclusive, and sustainable manner in

¹⁰ Yolanda Sulele, Fonnyke Pongkorung, and Christine J.J.G. Goni, "TINJAUAN YURIDIS PENDAFTARAN HAK ATAS TANAH MELALUI BUKU LETTER C, PETOK D DAN GIRIK DALAM MENCEGAH SENGKETA TANAH BERDASARKAN PERATURAN PEMERINTAH NOMOR 18 TAHUN 2021," *Lex Crimen* 13, no. 5 (2025).

¹¹ Romzul Fayadh, "Kedudukan Girik, Letter C Dan Pethuk Dalam Pembuktian Hak Atas Tanah Pasca PP No. 18 Tahun 2021: Kajian Yuridis Terhadap Kepastian Dan Keadilan Hukum Agraria," June 4, 2025.

line with the national land system modernization agenda.

To understand the gap between normative provisions and the reality of policy implementation, this study uses a socio-legal approach and qualitative methods to capture the lived experience of law implementation from the perspectives of community and administrative actors. The research is located at the Ponorogo District Land Office, with informants selected using purposive sampling. Informants consisted of three main groups: (1) BPN officers who handle land registration and conversion; (2) village officials from three villages in the sub-district (Mlarak, Siman, and Pulung) where there are still land parcels using Letter C; and (3) landowners who have traditional documents.

Data was collected through interviews and document studies (including Government Regulation No. 18 of 2021, village archives, and BPN reports). Primary data were analyzed thematically using within-case and cross-case analysis, while secondary data were analyzed descriptively and comparatively. Data validity was ensured through source triangulation. This study covers the policy implementation period in 2025.

B. Legal Transformation and Land Administration Digitalization

The transformation of land administration through Government Regulation No. 18 of 2021 is an essential milestone in the agenda of agrarian reform and the renewal of the national land bureaucracy. This is confirmed in Article 96, which stipulates that Letter C and other proof of ownership must be registered as certificates within five years of the regulation coming into effect, i.e., by February 2026. Thus, the status of Letter C in land law is recognized by the Ministry of Agrarian Affairs and Spatial Planning as the basis for evidence or legal grounds for land registration, resulting in a land title certificate. This provision demonstrates the state's commitment to building a more efficient, transparent, and accountable land system by leveraging information

technology in the land registration process.¹² A critical aspect of this policy is the implementation of electronic certificates to replace Letter C, which has been used for decades as the basis for ownership administration at the village level. This change provides the basis for a comprehensive reorganization of the land system, including at the regional level, such as in Ponorogo Regency, which is the location of this study.

The conversion of Letter C documents into certificates in Ponorogo Regency has not yet reached its full potential. Based on data from the Ponorogo Regency Land Office, there are a total of 568,000 plots of land in Ponorogo. As of 2025, 476,000 plots of land have been certified, while 92,000 plots of land have not yet been licensed or registered with the land office.¹³

Table 1 Comparison of the Number of Land Parcels That Have Been and Are Currently in the Process of Being Certified

Category	Number of land parcels (2025)	Percentage of total
Certified	476,000 plots	83,8 %
Not yet registered	92,000 plots	16,2 %
Currently undergoing conversion	17,446 fields	3,07 %

Source: Primary Data 2026

The data shows that there is still a gap in certification achievement, which has led to various obstacles to

¹² Shintiya Puteri and Asmarani Ramli, "Kepastian Hukum Letter C Sebagai Bukti Kepemilikan Tanah Dalam Perspektif PP Nomor 18 Tahun 2021," *Jurnal Ilmu Hukum, Humaniora Dan Politik* 5, no. 5 SE -Articles (June 19, 2025): 3757–72, <https://doi.org/10.38035/jihhp.v5i5.4694>.

¹³ "Ikatan PPAT Rayakan Ultah Di Rumah Dinas Bupati Ponorogo, Ada 92.000 Bidang Tanah Belum Terpetakan – Pemerintah Kabupaten Ponorogo," *Pemerintah Kabupaten Ponorogo*, 2025, <https://ponorogo.go.id/2025/09/25/ikatan-ppat-rayakan-ultah-di-rumah-dinas-bupati-ponorogo-ada-92-000-bidang-tanah-belum-terpetakan/>.

implementation at the local level.

Table 2 Characteristics of Villages Discussed in the Study

Village	Population	Percentage of Letter C ownership	Access to Digital Technology	Characteristics of Factors Causing Lack of Certification
Kaponan	Approximately 2,842 people	Approximately 19%	Low	Perception that Letter C is sufficient as proof of ownership
Distance	Approximately 2,367 people	Approximately 29%	Very low	Economic limitations
Sidoharjo	Approximately 3,036 people	Approximately 14%	Low	Cultural norms of intergenerational gift-giving

Source: Data Primer 2026

The communities in the three research villages exhibit different patterns in the importance they place on land certification. In Kaponan Village, the community has a pragmatic view of the law, namely that the Letter C remains sufficient proof of ownership as long as the land is not sold or used as collateral. Certificates are considered a situational necessity rather than an urgent need, so the tendency to register land is relatively low. In Jarak Village, community characteristics are more influenced by economic conditions and cost perceptions. Independent land registration is seen as costly, especially when using a notary/PPAT. This perception shapes the community's tendency to delay certification and to prefer waiting for more affordable government programs.

Meanwhile, Sidoharjo Village exhibits strong socio-cultural characteristics. The practice of distributing or

granting land from parents to children has been passed down from generation to generation. However, there is a social norm that considers certifying gifted land while the parents are still alive to be impolite or hasty. This cultural value influences land administration decisions at the family level. This classification shows that each village has a different social character in responding to the land certification process, namely a pragmatic-perceptual character in Kaponan, an economic-perceptual character in Jarak, and a cultural-normative character in Sidoharjo.

Normatively, Government Regulation No. 18 of 2021 aligns with the primary objective of Article 19 of the Basic Agrarian Law (UUPA), which requires the government to organize land registration to ensure legal certainty. This Government Regulation expands on the previous provisions in Government Regulation No. 24 of 1997 by adding a clause on the implementation of land registration to provide legal certainty.¹⁴ Consequently, Letter C is no longer considered a valid proof of ownership. This provision is reinforced by Article 97 of PP No. 18 of 2021, which states that traditional land documents may be used only as references in the land registration process, not as legally binding proof of rights. This legal basis is then elaborated on in more technical terms in the Minister of Agrarian Affairs and Spatial Planning/National Land Agency Regulation No. 3 of 2023, which introduces electronic land certificates as valid proof of rights, thereby providing a comprehensive legal basis for the digitization of land administration.¹⁵

The legal status of Letter C is further reinforced by Supreme Court Decision No. 3252 K/Pdt/2018, which concerns a land dispute based on Letter C evidence, confirming that the records in the Letter C Book do not have full evidentiary value as *prima facie* evidence of land

¹⁴ *Peraturan Pemerintah (PP) Nomor 24 Tahun 1997 Tentang Pendaftaran Tanah*, n.d.

¹⁵ *Peraturan Menteri Agraria Dan Tata Ruang/ Kepala Badan Pertanahan Nasional Republik Indonesia Nomor 3 Tahun 2023 Tentang Penerbitan Dokumen Elektronik Dalam Kegiatan Pendaftaran Tanah*, n.d.

ownership, unless supported by other valid evidence.¹⁶ The Supreme Court decision reinforces the principle that a land title certificate is the most substantial evidence of ownership under the Basic Agrarian Law (UUPA). At the same time, Letter C serves only as a record of ownership history and village taxes. This means that legal certainty of ownership can only be proven through a land title certificate issued by the National Land Agency (BPN), in accordance with the provisions of Article 19 of the UUPA.¹⁷ The consequences of this paradigm shift are significant for the people of Ponorogo, who have relied on village documents as the basis for their ownership claims.

According to Hans Kelsen's theory of legal certainty, law is a hierarchical system of norms. The validity of each norm depends on higher standards, and ultimately on the basic norm (*grundnorm*).¹⁸ In the context of land, land title certificates issued by the National Land Agency (BPN) are at a higher level of norms because they are based on the Basic Agrarian Law (UUPA), which serves as the national legal basis, thereby constituting a formally valid proof of ownership. Conversely, a Letter C issued by the village government falls below the normative level and can therefore be treated only as an administrative indication, not legally binding proof of ownership. Thus, Kelsen's theory emphasizes that legal certainty of ownership can be achieved only through certificates issued by authorized institutions, not through Letter C.

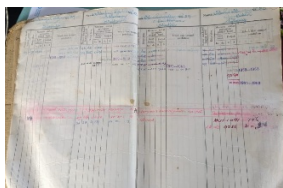
Philosophically, the elimination of traditional documents is driven by the need to overcome the weaknesses of the village land administration system, which is manual, unstandardized, and prone to interpretation differences. Letter C, for example, has significant historical value, but,

¹⁶ *Putusan Mahkamah Agung Nomor 3252 K/Pdt/2018*, n.d.

¹⁷ Nur Hidayani Alimuddin, "Implementasi Sertifikat Elektronik Sebagai Jaminan Kepastian Hukum Kepemilikan Hak Atas Tanah Di Indonesia," *SASI* 27, no. 3 (October 7, 2021): 335, <https://doi.org/10.47268/sasi.v27i3.509>.

¹⁸ Hans Kelsen, *Pure Theory of Law* (Berkeley & Los Angeles, California: University of California Press, 1960).

from a legal standpoint, it does not meet the formal requirements for evidence of ownership because measured field maps do not support it, do not follow standard accounting procedures, and are often not updated. This situation creates the potential for agrarian conflicts, such as overlapping data between villages and with field maps at the National Land Agency (BPN).¹⁹ Digitalization through electronic certificates is expected to address these issues by providing more accurate, integrated, and auditable records, thereby strengthening the legal certainty of land ownership.



*Figure 1: Letter C
book archive
(Source: Sidoharjo
Village Government)*



*Figure 2: Electronic
certificate
(Source: Ministry of
ATR/BPN)*



*Figure 3: Electronic
certificate
(Source: Ministry of
ATR/BPN)*

Figure 1 shows the fundamental difference between Letter C documents, which are still manually recorded at the village level, and electronic certificates, which have been integrated into the National Land Agency's digital system.

Although Government Regulation No. 18 of 2021 has provided apparent clarity on Letter C's status as merely a guideline in the land registration process, its implementation in Ponorogo Regency reveals a significant gap between legal norms and social reality. The results of an interview with the Secretary of Kaponan Village, Mlarak District, on December 12, 2025, Asnandar explained that most people still believe that Letter C is the most substantial proof of ownership,

¹⁹ Kharisma Setya Wardani and Septi Indrawati, "Implikasi Atas Kepemilikan Tanah Letter C Dalam Sengketa Agraria," *Eksaminasi: Jurnal Hukum* 4, no. 2 (2025): 93–106.

because the document has been passed down from generation to generation and has served as the basis for administration at the village level for decades. This general view indirectly weakens the legal force of Government Regulation No. 18 of 2021 in the eyes of the local community.

The prevailing view of Letter C's historical value as strong proof of ownership has led to a passive attitude among the people of Ponorogo, which has directly affected the slow conversion of documents. Kusdibyo, a member of the Sidoharjo village community, stated bluntly in an interview on January 9, 2026, that Letter C is sufficient due to traditional trust factors. As long as the land is not sold or used as collateral for a bank loan, he does not feel the urgency to switch to a certificate. This statement reflects a limited understanding of the difference between "physical control" and "legal ownership," which ultimately hinders the community from immediately seeking legal certainty through electronic certificates.

The transition from Letter C to electronic certificates has dual legal implications for owners of traditional documents. On the one hand, conversion provides an opportunity to obtain greater legal certainty and protection against potential disputes. However, people who do not immediately register risk losing the administrative basis on which they have relied, especially in cases of overlapping claims or boundary disputes. Because Letter C is only considered an initial indication, passive owners may be the most disadvantaged in the process of land administration modernization. This situation highlights the importance of a transition mechanism that is not only legal and formal but also considers the social and historical aspects of rural communities.

Overall, the legal analysis of PP No. 18 of 2021 shows that this regulation provides a strong legal basis for the digitization of land administration. However, field findings in Ponorogo Regency indicate that the success of policy implementation is strongly influenced by regional-level social, technical, and administrative readiness. Therefore, the effectiveness of this legal transformation is not only determined by the clarity of the norms, but also by the capacity of local governments, the National Land Agency

(BPN), and village governments to ensure that the transition process is inclusive, adaptive, and equitable.

Government Regulation No. 18 of 2021 is part of the central government's grand agenda of agrarian reform and modernization of the land administration bureaucracy. This policy aims to create a more efficient, transparent, and accountable system by integrating data into the electronic National Land System (SPN). The elimination of traditional documents such as Letter C is not merely an administrative simplification, but also an effort to strengthen legal certainty and reduce the potential for disputes.

However, from a legal perspective, the deletion of old documents must be accompanied by a mechanism that respects the community's historical rights. As emphasized by the Supreme Court in Decision No. 3252 K/Pdt/2018, Letter C only serves as an initial indication, not as valid proof of ownership. Thus, PP No. 18/2021 clarifies the status of these documents but, at the same time, places communities that depend on them in a vulnerable position, especially if they are not given adequate access to the conversion process.

C. Implementation Obstacles in Ponorogo Regency

George C. Edward III's Policy Implementation Theory explains that the success of policy implementation is determined by four main variables, namely: (1) policy communication; (2) implementing resources; (3) the disposition or attitude of implementers and the community; and (4) bureaucratic structure.²⁰ Through this approach, the effectiveness of land administration digitization is not only determined by the clarity of legal norms, but also by the extent to which the policy is socialized, the capacity of village officials and the National Land Agency (BPN) is prepared, community support and acceptance is formed, and administrative mechanisms and digital infrastructure enable the policy to be implemented optimally. In the context of land administration transformation, this theory is relevant for understanding why the legal transformation towards

²⁰ Tachjan, *Implementasi Kebijakan Publik*, ed. Dede Mariana and Caroline Paskarina (Bandung: AIPI, 2006).

electronic certificates faces various obstacles at the local level. The suboptimal conversion rate of Letter C to electronic certificates in Ponorogo Regency cannot be separated from the following obstacle.

Table 3 Implementation Barriers and Their Impact

Barriers	Main Impact	Data Sources
Lack of policy dissemination to the public	The public is unaware of the conversion deadline, so they still believe that Letter C is still legally valid.	Interviews with Endang Yuniarsih and Saifudin
Limited capacity of village officials	The data verification process is delayed, increasing the risk of data recording errors that could potentially lead to disputes over rights	Interview with Dah Ifrian Purwidya, Secretary of Jarak Village
Passive attitude of the community	Acceleration of Letter C conversion is hampered because it is considered socially safe but legally weak.	Interview with Kusdibyo
Data overlap	Overlapping land data undermines legal certainty and may lead to disputes and rights gaps.	Interview with Aris Mariono S.ST., M.H., Head of the Rights Management and Registration Section of the Ponorogo District Land Office

Costs and completion time	Widening access inequality, causing low-income groups to be delayed in obtaining certainty of rights.	Interview with Saifudin
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Source: Primary Data 2026

1. Lack of public awareness of land digitalization policies

According to Edward, the first variable that determines the success of policy implementation is policy communication. According to this theory, policies are ineffective if information about objectives, procedures, and regulatory obligations is not conveyed clearly, consistently, and comprehensibly to implementers and the public. The government has a responsibility to convey information about regulatory changes and land registration procedures to fulfill the principles of transparency and legal accessibility.²¹ However, on the ground in several villages, information regarding the abolition of the legal status of Letter C and the obligation to obtain electronic land certification has not been received equally by the village community. Endang Yuniarsih, a member of the Jarak village community, admitted in an interview on January 9, 2026, that she did not know that Letter C was no longer valid and was not aware of the electronic certificate program, only through informal news among residents, not from official explanations from the village government or the National Land Agency (BPN). This lack of socialization has led to low legal awareness among the community about the need to immediately convert their certificates, as they still believe that Letter C can serve as a valid proof of ownership.

From a legal perspective, the uneven dissemination of information has left the public without legal certainty regarding their rights, thereby indirectly contradicting the

²¹ Chazali H. Situmorang, *KEBIJAKAN PUBLIK (Teori Analisis, Implementasi Dan Evaluasi Kebijakan)*, ed. Wahyu Triono KS (Depok: SOCIAL SECURITY DEVELOPMENT INSTITUTE (SSDI), 2016).

objective of Government Regulation No. 18 of 2021, which seeks to strengthen legal certainty through the land tenure system. Meanwhile, from a social perspective, this obstacle causes anxiety and resistance, especially among the elderly and rural communities who are accustomed to relying on traditional village administrative records. Those most affected are landowners who still hold Letter C certificates. Thus, the uneven dissemination of information not only hinders achieving conversion targets but also creates a gap between national regulations and the reality of legal understanding at the community level.²²

2. Limitations in the capacity of village officials to carry out their roles in the field of land affairs

In terms of implementing resources, according to Edward's Policy Implementation Theory, they play an essential role in determining the effectiveness of policy implementation. These obstacles hinder the process of converting Letter C to electronic certificates in Ponorogo Regency. Village officials have a strategic role as providers of initial data, verifiers of historical ownership, and liaisons between the community and the National Land Agency (BPN) in the digitization of land administration. Many village officials do not yet understand the land registration digitization process, the data validation process, and how Letter C archives are converted to the electronic land system.²³ This condition was confirmed by Dah Ifrian Purwidya, Secretary of Jarak Village, in an interview on

²² Muhammad Juanda Hidayat, T Yasman Saputra, and Amzar Ardiyansyah, "Analisis Hukum Pelaksanaan Pendaftaran Tanah Sistematis Lengkap Di Kabupaten Pidie," *MEUSAPAT: Jurnal Ilmu Hukum* 4, no. 1 (2025): 172–96, <https://doi.org/https://doi.org/10.47647/meusapat.v4i1.3116>.

²³ Nihayati Tamimah et al., "Implementasi Program Pendaftaran Tanah Sistematis Lengkap (PTSL) Di Kelurahan Sumberadi," *Borobudur Law and Society Journal* 3, no. 4 (2024): 171–79, <https://doi.org/https://doi.org/10.31603/11827>.

December 19, 2025. He revealed that village officials have never received formal training on the technicalities of converting Letter C. As a result, village officials are learning on their own through direct service to the community. Coordination with the Land Office (BPN) is also reactive, with consultations held only when technical obstacles arise that cannot be resolved at the village level.

From an *administrative law-enforcement perspective*, the *limited capacity of village officials* has led to inadequate enforcement of regulations due to a lack of technical expertise among implementers. As a result, several administrative stages, such as checking land ownership history, tracing changes in ownership, and adjusting physical land boundaries, have been hampered. This not only slows down the conversion process but also increases the risk of data recording errors that could potentially lead to rights disputes. The parties most affected are landowners who need immediate conversion, BPN officials who repeatedly have to validate data, and village officials themselves, who experience an administrative burden without adequate training support.²⁴

3. The passive attitude of the community in the implementation of land conversion

The community's passive attitude is also a significant obstacle to the implementation of the conversion of Letter C to certificates in Ponorogo District. Based on field findings, some members of the community do not feel an urgent need to register their land because it is not being sold, is not being used as collateral for financial institutions, and is not being disputed. This situation is reinforced by the firm belief that

²⁴ Ahmad Hafidz and Ubaidillah Kamal, "Urgensi Sertifikasi Tanah Dalam Menjamin Kepastian Hukum Hak Atas Tanah Pasca Peniadaan Alat Bukti Tanah Tertulis Bekas Milik Adat Berdasarkan PP Nomor 18 Tahun 2021," *Bookchapter Hukum Dan Lingkungan* 1 (2025): 50–85.

Letter C is sufficient to secure land ownership, as this document has been accepted and recognized in village administrative practices for decades. This attitude leads the community to delay or even ignore the conversion process, even though, normatively, Letter C is no longer recognized as strong proof of ownership.²⁵

From the perspective of George C. Edward III's policy implementation theory, the community's passive attitude reflects the weakness of the disposition variable, or the attitude of policy recipients. Even with regulations established and conversion mechanisms in place, policies will not be effective if the community, the subject of the policy, is unwilling to participate actively. This passive attitude is not merely a form of rejection, but rather a perception that land registration does not yet provide direct benefits to the daily lives of rural communities. As a result, the target of accelerating the conversion of Letter C is difficult to achieve, especially in areas considered socially "safe," even though they lack legal certainty. This passive attitude also has the potential to create legal risks in the future. When there is a transfer of rights, a boundary dispute, or urgent administrative needs, the community recognizes the legal weakness of Letter C. At this point, the burden of proof becomes heavier, and the conversion process takes longer and costs more.

4. Overlapping data between historical Letter C Records

Discrepancies between subject data (owner) and object data (land area and boundaries) are often found during verification, especially when land ownership has changed through informal transfers, such as private sales or verbal inheritance. Based on an interview with Aris Mariono, Head of the Rights and Registration Section of the Ponorogo District Land Office, on January 8, 2026, data overlap between historical Letter C records and formal land data remains a common problem. One example is a plot of land that was

²⁵ Kholishotul Fu'adah, "PERLINDUNGAN HUKUM HAK MILIK ATAS TANAH LETTER C DALAM KASUS SENGKETA TANAH DI PERDESAAN" (Universitas Islam Sultan Agung Semarang, 2024).

actually certified decades ago, but was later sold in part, with only village officials' knowledge, without the certificate being split. During the development of the Systematic Land Registration Program, new buyers submitted land registration applications through village Letter C-based referral letters, either out of ignorance or for other reasons. However, because the land had already been registered and certified, the proper process was certificate division, not initial land registration. As a result, the application was rejected because a previous certificate was detected.

Problems such as this are often found in the implementation of the Complete Systematic Land Registration (PTSL) program. The inaccuracy of this data poses a legal risk in the form of potential ownership disputes if more than one party claims the same land. From a land law perspective, this situation hinders the fulfillment of the principle of legal certainty as mandated by the Basic Agrarian Law and Government Regulation No. 18 of 2021, as ownership status cannot be determined immediately until document clarification, tracing of ownership history, and re-measurement are carried out. Thus, overlapping data is not only an administrative problem but also has significant legal consequences, as it can create a *rechtsvacuum* (legal uncertainty) if the state fails to verify accurately and quickly.²⁶

5. The issue of cost and length of time required for Completion

Although normatively land digitization aims to simplify the land administration process, field findings show that the community faces a heavy financial burden, especially at the stage of re-measuring land parcels, which is a prerequisite for certificate issuance. For most rural communities, the costs of re-measurement and the subsequent administrative process are considered too high, thereby hindering their desire to immediately apply for conversion. This complaint was evident

²⁶ Shinta Dewi Artika and Ana Silviana, "Kepastian Hukum Atas Pemilik Tanah Yang Tumpang Tindih Akibat Penerbitan Sertifikat PTSL," *Noturius* 18, no. 1 (2025), <https://doi.org/https://doi.org/10.14710/nts.v18i1.57791>.

in an interview with Saifudin, a resident of Jarak village, on January 9, 2026, who was reluctant to apply for a certificate because the costs were considered too high and the process was very long, taking months or even years, because he had more than one uncertified plot of land and therefore preferred to wait for the PTSL program, which was much cheaper.

In addition to the issue of cost, the length of time required for the conversion process creates uncertainty, especially for landowners who need certificates for urgent purposes such as access to capital, proof of inheritance, or the settlement of civil disputes. From the perspective of agrarian justice, this obstacle shows that land digitization does not yet fully guarantee equal access to land rights protection. The upper-middle class has a greater opportunity to obtain electronic certificates quickly, while low-income groups are likely to experience delays and remain stuck using Letter C, which is no longer legally valid.²⁷

Table 4 Comparison of Conversion Costs Based on Program

Type of processing	Total Cost	Cost Components	Completion Time
Sporadic (Non-PTSL)	10,000,000-20,000,000	Measurement, taxes, administration	1–6 months (30–180 Working days)
Systematic (PTSL)	150,000-450,000	Government-funded (no measurement fees)	1–3 months (30–90 working days)

Source: Primary Data 2026

It is important to note that the high public perception of the high cost of land registration is not entirely due to BPN policies, but is influenced by a lack of understanding of the stages, cost components, and regulations governing

²⁷ Allan Setiawan Maniwu, Roy V. Karamoy, and Marthin Doodoh, "KEKUATAN PEMBUKTIAN SERTIFIKAT HAK ATAS TANAH BERDASARKAN PERATURAN PEMERINTAH NOMOR 18 TAHUN 2021," *LEX CRIMEN* 11, no. 6 (2021).

registration applications. Many citizens assume that obtaining a certificate is expensive because they are accustomed to using notaries/PPATs who charge professional fees outside state regulations, even though notary services are not mandatory for all types of land registration. This lack of knowledge often leads the public to associate all the costs they incur with BPN policies, when in fact most of the additional costs come from intermediary services, not from official government regulations.

Under Government Regulation No. 128 of 2015, land registration fees that constitute Non-Tax State Revenue (PNBP) cover only survey and mapping costs, land inspection costs, and registration fees, with rates officially set by the state.²⁸ Therefore, if the public handles registration applications independently and directly at the land office in accordance with the official mechanism, the costs incurred will be much more affordable and transparent. This is in line with the BPN's assertion that the involvement of a notary/PPAT is optional, not mandatory, except for certain types of legal actions that normatively require a PPAT deed, so that the use of notary services is not necessary for every land certificate application.

D. Conversion Mechanism and Protection of Historical Rights

To overcome various obstacles in converting traditional land documents into land title certificates, the Ponorogo District Land Office does not, in principle, establish any special mechanisms beyond the provisions of the applicable laws and regulations. Based on an interview with Aris Mariono, Head of the Rights and Registration Section of the Ponorogo District Land Office, on January 8, 2026, it was explained that the entire process of converting traditional land documents into land title certificates is basically regulated in Government Regulation No. 24 of 1997 concerning Land Registration and Regulation of the Minister

²⁸ *Peraturan Pemerintah (PP) Nomor 128 Tahun 2015 Tentang Jenis Dan Tarif Atas Jenis Penerimaan Negara Bukan Pajak Yang Berlaku Pada Kementerian Agraria Dan Tata Ruang/Badan Pertanahan Nasional*, n.d.

of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia No. 12 of 2021 concerning Technical Considerations for Land Affairs.

However, in practice, the Ponorogo District Land Office implements a planned and adaptive service strategy as a response to the social conditions of the village community. In this context, what is often understood as a gradual conversion scheme is in fact a pattern of implementation of existing regulations. This pattern serves as a legal transition mechanism that does not make Letter C a stand-alone proof of ownership, but rather a starting point for land registration applications that must be verified through additional requirements. This approach is carried out through careful service planning, effective time management, and employee synergy at the Ponorogo Regency Land Office, ensuring the land registration process remains transparent and in accordance with applicable legal provisions. This approach aims to balance the need for formal legal certainty with the protection of the historical rights of communities that have controlled the land for generations.

In this gradual conversion scheme, Letter C serves as an administrative basis, an entry point, and evidence of proof in the process of registering land for the first time. This position is in line with Article 97 of Government Regulation No. 18 of 2021, which states that old land documents may only be used as evidence for land registration purposes. Thus, the use of Letter C in the conversion scheme does not conflict with positive law, provided the document is equipped with a verification mechanism that ensures the accuracy of the land's physical and legal data.²⁹

The first requirement in the gradual conversion scheme is a statement of continuous land tenure for at least twenty years. This statement of continuous physical control serves to prove the existence of actual, continuous physical control exercised in good faith by the applicant. In the context of land

²⁹ Lintang Ratrisnanti, "Implikasi Yuridis Kepemilikan Letter C, Patuk D, Dan Landrente Pasca Berlakunya PP 18 2021," *Jaksa: Jurnal Kajian Ilmu Hukum Dan Politik* 3, no. 1 (2025): 19–30, <https://doi.org/10.51903/jaksa.v3i1.2329>.

law, physical possession plays a vital role as an indicator of the legal relationship between the subject and the land, especially when written evidence does not fully meet formal requirements. The requirement of continuous possession is also intended to prevent unilateral claims over potentially disputed land. From the perspective of protecting historical rights, the land possession statement letter provides space for village communities that have possessed land for generations but do not yet have land title certificates. The state does not simply negate these historical relationships but accommodates them through additional rational and proportional proof mechanisms. Thus, this requirement serves as both an instrument for protecting community rights and an administrative control tool.³⁰

The second requirement is the consent of the owners of land directly adjacent to the land proposed for conversion. This neighborly consent serves an essential function as social validation of the clarity of land boundaries. In village administration practice, land boundaries are often determined by verbal agreements and collective community knowledge rather than standardized survey maps. Legally, neighbor consent reflects the principle of prudence in land registration, particularly in ensuring the certainty of the object of rights. The involvement of parties directly adjacent to the land being applied for allows for preliminary verification of the applicant's claim of ownership.³¹ In the context of protecting historical land rights, this mechanism also reflects the community's recognition of social land ownership, which has essential evidentiary value when historical data in Letter C is incomplete or outdated.

The third requirement is that the National Land Agency

³⁰ Noor Atikah, "Kedudukan Surat Keterangan Tanah Sebagai Bukti Kepemilikan Hak Atas Tanah Dalam Sistem Hukum Pertanahan Indonesia," *Notary Law Journal* 1, no. 3 (2022): 263–89, <https://doi.org/https://doi.org/10.32801/nolaj.v1i3.29>.

³¹ Theresia Supriyanti, Ardhi Arnanto Ardhi, and Jamaluddin Mahasari, "Pengaturan Dan Penerapan Asas Contradictoire Delimitatie Di Kantor Pertanahan Kabupaten Kebumen," *Widya Bhumi* 3, no. 1 (2023): 46–61, <https://doi.org/https://doi.org/10.31292/wb.v3i1.39>.

officials do a re-measurement. Re-measurement is a crucial step in the conversion scheme because it ensures the area, location, and boundaries of the land are accurate based on field conditions. Through re-measurement, manual historical village data can be integrated into the national land system using field maps, thereby reducing the risk of data overlap and rights disputes. From a land law perspective, re-measurement is a key requirement for fulfilling the principle of legal certainty of rights objects. Without clarity about the object, the issuance of certificates may contain administrative flaws that can weaken their evidentiary strength. Therefore, although remeasurement is often perceived as a costly and time-consuming step, in regulatory terms, it cannot be ignored to guarantee long-term legal certainty and protection for rights holders.³²

Normatively, the gradual conversion scheme implemented in Ponorogo Regency is in line with the provisions of Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number

12 of 2021 concerning Technical Considerations on Land. Furthermore, conceptually, this mechanism is rooted in the provisions of Government Regulation No. 24 of 1997 on Land Registration, specifically Articles 13 and 24, which govern the initial registration of land. Article 13 of Government Regulation No. 24 of 1997 stipulates that initial land registration is carried out through the collection and processing of physical and legal data, while Article 24 allows for the use of unwritten evidence, such as unwritten evidence, including witness statements and actual physical control, as long as their authenticity can be verified. This provision shows that from the outset, the national land registration system has accommodated the conditions of communities that do not yet have formal proof of ownership. This

³² Sisca Anindya Rachmawati, "Revolusi Sistem Pencatatan Tanah Melalui Program Pendaftaran Tanah Sistematis Lengkap (PTSL)(Studi Lapangan Di Desa Bantul)," *Widya Pranata Hukum: Jurnal Kajian Dan Penelitian Hukum* 3, no. 1 (2021): 105–28, <https://doi.org/https://doi.org/10.37631/widyapranata.v3i1.273>.

regulation governs the initial registration of land through the stages of application, field review, data processing and analysis, discussion meetings, preparation of minutes and maps, and issuance of certificates. The requirements for a statement of control, neighbor approval, and re-measurement essentially operationalize these stages in the context of converting traditional land documents.³³

Table 5 Conversion Steps and Requirements

Conversion Stages	Mandatory Requirements	Estimated Time
Initial application	Letter of introduction from the village, original Letter C document	3-7 days
Verification of village data	Neighbor approval, statement of ownership letter	7-14 days
measurement by the BPN officer	Survey fees, latest field map	14-30 days
Certificate issuance and issuance	Data validation in the SPN system	30-60 days

Source: Ministry of Agrarian Affairs and Spatial Planning (ATR/BPN)

Within the framework of historical rights protection, the gradual conversion scheme can be considered a progressive step because it does not directly abolish Letter C, but rather integrates it into the formal land law system through a multi-layered verification process. This approach reflects the state's efforts to apply substantive justice, namely, providing fair legal protection for rural communities without neglecting the goal of modernizing land administration. However, the

³³ Lisnadia Nur Avivah, Sutaryono Sutaryono, and Dwi Wulan Titik Andari Andari, "Pentingnya Pendaftaran Tanah Untuk Pertama Kali Dalam Rangka Perlindungan Hukum Kepemilikan Sertifikat Tanah," *Tunas Agraria* 5, no. 3 (September 5, 2022): 197–210, <https://doi.org/10.31292/jta.v5i3.186>.

effectiveness of the gradual conversion scheme depends heavily on the support of local and village governments. Without such support, the mechanisms designed normatively may not run optimally at the implementation level. Therefore, a mass socialization program through local media and village meetings is needed to raise public awareness of the importance of land registration and the deadline for converting traditional documents.³⁴

In addition to socialization, technical training for village officials is also an urgent need. Village officials play a key role in land services at the local level, particularly in providing initial data and verifying land tenure history. Without adequate capacity, village officials will find it challenging to carry out this strategic role, which will ultimately slow down the conversion process. From the perspective of agrarian justice, the provision of grants or subsidies to finance re-measurement for low-income communities is an essential affirmative step because Article 9, paragraph 2 of the Basic Agrarian Law states that every Indonesian citizen, both male and female, has the same opportunity to obtain land rights and to reap the benefits and fruits thereof, both for themselves and their families. This policy aims to prevent inequality in access to land rights certificates, ensuring that all groups can complete the conversion process quickly. With financing support, the land digitization process is expected to be more inclusive.³⁵

The final recommendation is to develop an integrated digital platform that combines village land data and BPN data in real time. This data integration is essential to address overlapping historical data and improve the accuracy of land information. Through an integrated system, the verification

³⁴ Vidya Aurora Wibowo et al., "PENDAFTARAN TANAH SEBAGAI INSTRUMEN PREVENTIF DALAM PENYELESAIAN DAN PENCEGAHAN SENGKETA PERTANAHAN: KAJIAN HUKUM ATAS IMPLEMENTASI KEBIJAKAN PTSL," *Causa: Jurnal Hukum Dan Kewarganegaraan* 16, no. 1 (2025): 1611–20.

³⁵ I Gede Andre Sutarsana, "PELAKSANAAN PENDAFTARAN TANAH SISTEMATIS LENGKAP (PTSL) DI DESA KEDEWATAN KABUPATEN GIANYAR," *Kerta Dyatmika* 20, no. 2 (2023): 23–34, <https://doi.org/https://doi.org/10.46650/kd.v20i2.1420>.

and decision-making processes in land registration can be carried out more quickly, transparently, and accountably, thereby supporting the achievement of legal certainty and protection of land rights for the community.

E. Conclusion

Government Regulation No. 18 of 2021 is a strategic step and an essential milestone in the agenda of agrarian reform and modernization of the national agrarian law system. This policy aims to provide legal certainty by eliminating outdated documents such as Letter C, Girik, and Petok D, and replacing them with electronic certificates issued under the National Land System. However, its implementation in Ponorogo Regency through 2025 shows that the achievement has not been optimal, with around 92,000 land parcels still not certified. This ineffectiveness is due to social obstacles: the community still strongly trusts the historical value of Letter C. It tends to be passive because they feel there is no urgent need for conversion. In addition, there are administrative obstacles, including limited capacity among village officials who have not received formal training, as well as technical obstacles related to data overlap between village historical records and formal data at the National Land Agency (BPN). Without an inclusive approach, this transition risks triggering land dispossession and legal coverage for the community, especially ahead of the conversion deadline in February 2026.

As an improvement measure, a comprehensive strategy that leverages synergy among local governments, the National Land Agency (BPN), and village governments is needed to accelerate the transition process fairly and equitably. The main priorities include intensifying socialization to raise public awareness of the importance of electronic land registration. In addition, technical training for village officials is urgently needed to enable them to verify initial data and land ownership history accurately. To ensure inclusiveness, the government needs to provide support funds or subsidies to cover re-measurement costs for the community, preventing inequality in access to land rights

protection. The development of an integrated digital platform that incorporates real-time land data is also significant for overcoming historical data overlaps. Finally, more detailed technical guidelines are needed from the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN) on the mechanism for converting land documents that preserve communities' historical rights through a transparent and accountable verification process.

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